

Scott Douglas Patterson  
Claimant  
First Statement  
Exhibit SDP1  
21 May 2025

**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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**FIRST WITNESS STATEMENT OF  
SCOTT DOUGLAS PATTERSON**

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I, **Scott Douglas Patterson**, of Teledyne UK Limited, Airedale House, Acorn Park, Shipley, West Yorkshire BD17 7SW, will state as follows –

1. I am employed by the Claimant, Teledyne UK Limited (**‘Teledyne UK’**) as the Site Director of the Shipley Site (defined in these proceedings as Teledyne UK Limited, Airedale House, Acorn Park, Shipley, West Yorkshire BD17 7SW).
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 in this statement are within my own knowledge unless otherwise stated, and I believe them to be true. Where I refer to information supplied by others, the source of the information is identified; facts and matters derived from other sources are true to the best of my knowledge and belief. This witness statement has been made following conference and consultation with Teledyne UK’s legal advisers.
4. There is now produced and shown to me a paginated bundle of true copy documents marked **SDP1**. All references to that bundle are in the format **SDP1/page number**.

### **Scope of this statement**

5. In this statement, I shall address the following:
  - i. additional information on the Shipley Site;
  - ii. further details on incidents of protest at the Shipley Site;
  - iii. observations on the effectiveness of the injunction.
6. To assist the Named Defendants, specific evidence in relation to each can be found in the following paragraphs:
  - i. D1 Julian Allen Gao: paragraphs 25 to 34;
  - ii. D2 Ruby Hamill: paragraphs 25 to 34;
  - iii. D3 Daniel Jones: paragraphs 25 to 34;
  - iv. D4 Najam Shah: paragraphs 25 to 34;
  - v. D5 Ricky Southall: paragraphs 35 to 45;
  - vi. D6 Amareen Afzal: paragraphs 35 to 45;
  - vii. D7 Serena Fenton: paragraphs 35 to 45;
  - viii. D19 Mary Ensell: paragraphs 46 to 66;
  - ix. D20 Harry Wade: paragraphs 46 to 66.

### **ADDITIONAL INFORMATION ON THE SHIPLEY SITE**

7. I understand from Nicholas Wargent, a director of Teledyne UK, that he has already given evidence in relation to the location and boundaries of the Shipley Site. I shall here clarify two additional points of relevance.

### **Rear fencing and public footpath**

8. I exhibit at **SDP1/1 – 2** the Land Registry title plan for the Shipley Site (which is also exhibited to Mr Wargent's first witness statement). As can be seen from that plan, the red

line which marks the boundary to the freehold title at the rear of the site in fact runs through the middle of the River Aire. Accordingly, Teledyne UK holds the freehold title to all land up to the midpoint of the river.

9. As can be seen from the satellite views annexed to the injunction order (see **SDP1/3**), at the rear of the Shipley Site, there is a wooded area. That wooded area sits between the river bank and the rear of the operational area of the Shipley Site, and is within in the freehold title to the site. The fencing at the rear of the Shipley Site fences off the operational area of the Shipley Site, and sits just back from the wooded area. As such, the wooded area is accessible to the public, and is not fenced off.
10. The fencing at the rear of the Shipley Site which excludes the public from the operational area of the site is link fencing with barbed wire on top; there can be no confusion that the public are excluded from the operational area of the Shipley Site.
11. The location of the fencing, and the wooded area, can be seen on the satellite view map exhibited at **SDP1/4**. This is the map that Teledyne UK have produced to show where the injunction signs have been placed on the perimeter of the Shipley Site (marked by the yellow dots). To the rear of the Shipley Site, two red lines can be seen. The furthest line marks the freehold boundary to the site and runs through the River Aire. The line closest to the operational area of the Shipley Site shows the location of the fencing (to which injunction signs have been attached). The wooded area can also be seen (in which two injunction signs have also been erected).
12. Through the wooded area, there is a public right of way; this is why the wooded area is not fenced off in the same way that the operational area of the Shipley Site is. Referring again to the Land Registry title plan at **SDP1/1 – 2**, the footpath is marked by the dashed line that runs parallel with the River Aire. That footpath is outside of the operational area of the Shipley Site (it being in the wooded area), and is outside of the fenced area of the Shipley Site (ie. it is accessible by the public, as is required by law).
13. I exhibit at **SDP1/5 – 7** the plan of the adopted highways, produced by the City of Bradford Metropolitan District Council (the local highway authority). That plan shows public rights of way, marked in purple. The right of way that runs at the rear of the Shipley Site and

parallel to the River Aire can be seen. There is also a right of way that runs parallel to the western boundary of the Shipley Site, and perpendicular to the River Aire, providing access to the river path. That western path appears to sit just outside of the freehold title to the Shipley Site. On the ground, the western footpath runs alongside the fencing to the Shipley Site on the western boundary, and outside of the fenced site; anyone using that footpath is not within the operational area of the Shipley Site, from which they are excluded.

### **The front of the Shipley Site**

14. I have made an affidavit in a contempt application in relation to alleged breaches of the injunction by D19 Mary Ensell and D20 Harry Wade. In that affidavit, I explained in detail the location and positioning of the boundary to the Shipley Site at the front of the site. I shall explain the same here.
15. Referring again to the Land Registry title plan of the Shipley Site exhibited at **SDP1/1 – 2**, the vehicular access to the Shipley Site can be seen on the north-west elevation of the Site; the access is off Acorn Park, and is where there is a slight curvature to the red line. This is the only vehicular access to the Site. There is a pedestrian gate to the left of the vehicular gate (if you are facing the gates from Acorn Park). As can be seen, the red-line boundary of the freehold title excludes the pavements (denoted by the dashed lines) that are adjacent to Acorn Park, but includes the pavements that are on the short access road into the Shipley Site. The red-line boundary of the freehold title runs almost (but not quite) up to the bell-mouth of the short access road, and tracks the back edge of the pavement adjacent to Acorn Park.
16. The fencing at the front of the Shipley Site adjacent to Acorn Park, with the exception of the gate (as I shall explain below) and therefore also the fencing at the front of the Site perpendicular to Acorn Park and leading towards the gate, tracks the red-line boundary to the Site.
17. Referring again to the plan of the adopted highways around the Shipley Site, exhibited at **SDP1/7**, that plan shows the adopted highway in yellow, which includes Acorn Park. At the front of the Shipley Site, the extent of the highway appears to follow the same line as the boundary to the freehold title of the Shipley Site. Accordingly, none of the land within

the freehold title to the Shipley Site is adopted highway. I note also on this highway plan that there is a straight line that runs across the short access road into the Shipley Site; this line depicts the location of the vehicular gate.

18. Referring again to the satellite view exhibited at **SDP1/3**, the freehold title to the Site is again marked in red, and has been produced with special software that overlays the red-line from the filed plan at HM Land Registry onto the satellite view. The red line therefore accurately captures the boundary of the freehold title to the Shipley Site.

19. In this satellite view, the sun appears to be shining from the south-east, as the shadows from the cars and buildings are cast towards the north-west. At the access to the Shipley Site, the location of the vehicular gate can be seen (it too is casting a shadow to the north-west, and the top of the physical gate itself is the solid line). The gate is around half way down the short access road onto the Shipley Site from Acorn Park, and is located inside the boundary to the Site.

20. Accordingly, it follows that:

- i. there is an area in front of the vehicular gate to the Shipley Site that is within the freehold title to the Shipley Site; but
- ii. the area at the junction of Acorn Park and the access road to the Shipley Site sits outside of the freehold title to the Shipley Site, and is adopted highway.

21. I exhibit at **SDP1/8** a photograph that I took on 3 February 2025. This photo is taken from the carriageway at Acorn Park, directly facing the vehicular gates to the Shipley Site. The yellow retractable security bollards that protect the gate to the Shipley Site are in an upright position in this picture.

22. Lastly, I exhibit at **SDP1/9** a second photograph also taken by me on 3 February 2025. This image shows the area in front of the gate to the Shipley Site, and is taken from a position just to the right of the gate area (if looking at the gates from Acorn Park). The pedestrian gate is also visible in this picture. Having regard to the various plans and satellite views that I have exhibited, the yellow bollards to the Shipley Site, which can be seen in the

picture, appear to sit just within the freehold title to the Shipley Site (certainly those bollards furthest away from the camera do, as a result of the curvature of the freehold title to the Shipley Site across the access road); the boundary to the Site is just slightly further forward than the bollards.

23. The distance between the gate and the bollards is approximately 250cm.

### **PROTESTS AT THE SHIPLEY SITE**

24. I understand from Mr Wargent that he has already given evidence on protest incidents that occurred at the Shipley Site in 2024, as well as on two incidents that have occurred in 2025. I shall here give further details on each of those incidents.

### **2 April 2024: D1 Julian Allen Gao, D2 Ruby Hamill, D3 Daniel Jones and D4 Najam Shah**

25. On 2 April 2024, the first of two rooftop occupations by supporters of the group known as Palestine Action occurred. I understand that Mr Wargent has already outlined the incident, and given details on the damage caused by the protest and the cost incurred (including by way of repair and loss of production and revenue). I will not repeat that information, and instead supplement it.

26. The incident started at approximately 5.30am, when four protestors (who I now know to be the First to Fourth Defendants inclusive), attended the Shipley Site. The Defendants gained access to the Shipley Site by using an angle grinder to cut through the fence at the rear of the site. Accordingly, it is likely that they used the aforementioned footpath to the rear of the site (and possibly also that on the western boundary) to walk through the wooded area and then access the rear fence line.

27. Once the Defendants were detected on site, the security staff at the Shipley Site called the police. I understand from the security staff that one of the security staff located and disturbed the Defendants as they were climbing onto the roof of the building, and therefore the Defendants were not able to carry all of the kit that they had brought with them up on to roof of the building, and left some of it on the ground. I understand that items left on the ground included a fire extinguisher. Mr Wargent exhibited at NJW1/182 a photograph of

items that were recovered at the Shipley Site, which includes a fire extinguisher (and sledgehammer and bolt cutters).

28. Other Teledyne UK staff started arriving at the Shipley Site from around 6am, and I arrived at the site at approximately 7am (as I usually would), upon which I took over the co-ordination of Teledyne UK's response to the incident. By the time of my arrival, there was already a significant police presence at the Shipley Site.
29. Whilst the Defendants were on the roof of the building, I observed them using sledgehammers, crowbars and other similar tools to damage the roof of the building. One of the areas in the building below that was damaged by the falling roof debris was the 'Clean Room', which is a sensitive area of the site in which production occurs. I understand that Mr Wargent has already exhibited the photographs of the damage caused by the Defendants to his first witness statement, so I will not re-exhibit those here. I also observed the Defendants throwing roof tiles; this was especially concerning as they were throwing the tiles towards and on to high pressure gas cylinders. If damaged, those gas cylinders could be a major hazard and risk to safety (I note that a gas cylinder is visible in exhibit NJW1/187 to Mr Wargent's first statement, which is a still CCTV image from the Shipley Site).
30. The incident lasted for approximately 16 hours in total, and my observation was that the Defendants continued to damage the roof for several hours before downing tools and then just sitting on the roof.
31. I estimate that, at the height of the incident, there were approximately 40 police officers at the Shipley Site. It appeared to me that there were a wide range of specialist officers, including a working at heights team and drone operators, as well as officers who were generally securing and controlling the scene on the ground. I also recall there being four ambulances (one for each Defendant on the roof), as well as a fire engine in attendance (which had a platform lift on the appliance).
32. The police officers in attendance did not climb onto the roof to retrieve the Defendants. I understood from the officers in attendance that they considered the damage so extensive, that the roof was not safe. Eventually, after negotiation, the Defendants came down from



the roof voluntarily via the platform lift on the fire engine, and were arrested (which as I say, was around 16 hours after the event started). I remained at the Shipley Site until the arrests took place, and observed the arrests.

33. I refer to the photograph exhibited at NJW1/176, which I re-exhibit as **SDP1/10**. This photograph shows the Defendants on the roof of the building on the Shipley Site. From left to right in that photograph I can identify: **D4 Najam Shah, D2 Ruby Hamill, D1 Julian Allen Gao** and **D3 Daniel Jones**. I also refer to the photograph at NJW1/179, which I re-exhibit as **SDP1/11**. This photograph shows the Defendants on the roof of the building on the Shipley Site. From left to right in that photograph I can identify: **D2 Ruby Hamill, D4 Najam Shah, D1 Julian Allen Gao** and **D3 Daniel Jones**. I do not know who took either of the exhibited photographs.

34. I am familiar with the Defendants and able to identify them (albeit I sometimes need to refresh my memory as to which person is which Named Defendant) as, in September 2024, I attended the trial in the criminal proceedings relating to the incident on 2 April 2024, and gave evidence. At that trial, I was cross-examined by **D1 Julian Allen Gao** (who represented himself at trial). Further, I note that, following the trial, BBC News published an online article which carried pictures of the Defendants, along with their names (although D4 is referred to as Sayed Shah): <https://www.bbc.co.uk/news/articles/cx2e2qgx4w9o> (see **SDP1/12 - 13**). As that news article explains, the trial produced a hung jury, and a re-trial is scheduled for February 2026, at which I am also due to give evidence. At trial, none of the Defendants denied their alleged actions on 2 April 2024, but instead argued that they should escape liability as they were trying to prevent genocide.

#### **15 May 2024: D5 Ricky Southall, D6 Amareen Afzal and D7 Serena Fenton**

35. On 15 May 2024, the second of two rooftop occupations by supporters of the group known as Palestine Action occurred. I understand that Mr Wargent has already outlined the incident, and given details on the damage caused by the protest and the cost incurred (including by way of repair and loss of production and revenue). I will not repeat that information, and instead supplement it.

36. The incident started at approximately 4.30am, when four protestors attended the Shipley Site. I now know these persons to be the Fifth to Seventh Defendants (inclusive), plus one additional person who has not been named as a defendant in these proceedings. On this occasion, the Defendants gained access to the Shipley Site by climbing over the fence to the Shipley Site on the western boundary – where the aforementioned footpath is that runs down to and meets up with the river path. The Defendants used a ladder to scale the fence, and placed a thin mattress-type object over the barbed wire on top of the fence to allow them to climb over it.
37. Once on the Shipley Site, the Defendants ran across the car park, up a fire escape, and then used a short ladder to reach the roof a modular building on the site. Security staff at the Shipley Site detected the intrusion, and I understand that they saw the Defendants climb on to the roof, and called the police immediately.
38. As with the first incident, other Teledyne UK staff started to arrive at the Shipley Site from around 6am and I arrived at the site at approximately 7am (as I usually would), upon which I took over the co-ordination of Teledyne UK's response to the incident. By the time of my arrival, there was already a significant police presence at the Shipley Site.
39. When the Defendants were on the roof of the building, I observed them using hammers and similar tools to damage the roof, hanging flags and banners from the roof and also using spray paint to graffiti the building. I understand that Mr Wargent has already exhibited photographs of the damage caused by the Defendants to his first witness statement, so I will not re-exhibit those here.
40. I was also alarmed to observe the Defendants throwing fireworks from the roof; these were thrown at police officers on the ground, as well as into the modular building on which the Defendants were standing. This struck me as especially reckless and dangerous, and thankfully nobody was hurt, and no fire was caused.
41. I estimate that, at the height of the incident, there were again approximately 40 police officers at the Shipley Site. It appeared to me that there were a wide range of specialist officers, including a working at heights team and drone operators, as well as officers who were generally securing and controlling the scene on the ground. I also recall there being

four ambulances (one for each Defendant on the roof), as well as a fire engine in attendance (which had a platform lift on the appliance).

42. This incident was much shorter lived than the first rooftop occupation. On this occasion the police officers in attendance did climb onto the roof to retrieve the Defendants. Upon which the Defendants came down from the roof voluntarily via the platform lift on the fire engine, and were arrested.

43. I remained at the Shipley Site until the arrests took place, and observed the arrests. The incident lasted for around seven hours in total.

44. I refer to the photograph exhibited at NJW1/185, which I re-exhibit as **SDP1/14**. This is a photograph that shows the Defendants on the roof of the building on the Shipley Site. From left to right in that photograph I can identify: **D6 Amareen Afzal, D5 Ricky Southall and D7 Serena Fenton**. I do not know who took this photograph.

45. I am familiar with the Defendants and able to identify them (albeit I sometimes need to refresh my memory as to which person is which Named Defendant), as I have very recently attended the trial in the criminal proceedings relating to the incident on 15 May 2024, and gave evidence. The trial commenced on 12 May 2025, and I gave evidence on 13 May 2025. I understand that the trial is due to last for two weeks. Again, none of the Defendants deny their alleged actions on 15 May 2024, but instead argue that they should escape liability as they were trying to prevent genocide.

#### **28 January 2025: D19 Mary Ensell, D19 Harry Wade and Persons Unknown**

46. I understand from Teledyne UK's legal advisers that the fourth witness statement of Manan Singh has already introduced this incident to the court. I respectfully ask the court to consider that statement and its exhibits, alongside this supplementary material.

47. In the early hours of 28 January 2025, a breach of the interim injunction occurred, involving **D19 Mary Ensell, D20 Harry Wade and Persons Unknown**. I have made an affidavit in support of a contempt application.

48. In the interests of proportionality, I will not exhibit the CCTV video evidence (as I have in the contempt application), but will instead exhibit still images.
49. On 28 January 2025, shortly before 5am, a white Vauxhall Vivaro van (which is a Transit-style van) was deliberately driven at speed at the yellow retractable bollards that sit in front of the gate to the Shipley Site. At the time of the incident, the bollards were upright and protecting the gate. The impact of the van damaged two bollards, with one bollard partially collapsing and the van coming to rest on top of the bollard. The vehicular access to the site (and egress) was completely blocked by the van. Immediately after the van crashed, two people who had arrived in a support vehicle and who had been observing the van crash, and who I now know to be **D19 Mary Ensell** and **D20 Harry Wade**, proceeded to lock on to the van, where they remained until approximately 12.30pm. The driver of the van made off in the support vehicle and has never been identified.
50. I was not at the Shipley Site at the time the van crashed, or when the lock-on started. I arrived at the Shipley Site at around 7.25am, upon which I took over the co-ordination of Teledyne UK's response to the incident. There was already a significant police presence at the Shipley Site when I arrived, the security staff having called them immediately upon the van crashing. I have reviewed the CCTV and seen the van crash, and the events that occurred immediately after that (which videos are all exhibited to my affidavit in the contempt application).
51. My review of the CCTV footage, and the reports that I have received from the security staff and other colleagues at the Shipley Site who were present before 7.25am, can be summarised as follows.
52. The van and support vehicle arrived at the Shipley Site just before 5am. The support vehicle (a hatch-back style car) parked-up, and the Defendants exited the vehicle, whilst the van was manoeuvred into position so that it faced head-on the yellow bollards protecting the gate to the Shipley Site. The van was then driven at speed at the bollards as described above. After crashing the van, the driver of the van then exited the vehicle and, within a few minutes, the driver left the scene in the support vehicle. Ms Ensell and Mr Wade, having observed the van crash, then proceed to 'lock-on' to the van. The lock-on was pre-meditated, and must have required a lot of planning. The van had been reinforced with

concrete, just behind the seats of the van; some sort of wooden-framed box appears to have been constructed and a steel tube inserted through the box and van, with external holes in the van at each side. Concrete then seems to have been poured into that box to prevent access to the steel tube (effectively cementing the tube into the van). Ms Ensell and Mr Wade inserted their arms into the tube-like openings on the exterior of the van, and affixed themselves somehow (although it is not entirely clear to me how).

53. An unknown fluid was leaking from the van whilst it was wedged on top of the bollard. The assessment of the staff present at the Shipley Site at the time was that the fluid was likely to be from the engine of the van and not harmful. Some sand was placed on the ground to help contain the spill.

54. I then arrived at the Shipley Site 7.25am. I took several photographs of the incident throughout the day, which I exhibit below:

- i. **SDP1/15 – 16**, are two photographs which show where the van has come to rest, having crashed into the bollards;
- ii. **SDP1/17**, which is captured from underneath the van, and shows the partially collapsed bollard, on which the van has come to rest. As can be seen from the photograph, the van is effectively wedged on the bollard, and it would not be able to reverse back without damaging the underneath of the van further;
- iii. **SDP1/18**, which is taken from the driver's front door of the van, looking into the back of the van. This photograph shows the wooden-structure filled with concrete.
- iv. **SDP1/19** shows **Ms Ensell** sitting on the ground next to the rear driver's side wheel of the van. She is wearing a dark coat with the hood up, and a peaked cap. The lower half of Ms Ensell's body is covered by what appears to be a homemade protest poster. The poster includes a number of hand drawn swastika symbols. Her right arm is inserted into the tube-like opening in the van. In the bottom left corner of the photograph an orange bag is visible, as well as a white powder-like substance on the ground around the back of the van; this is the sand that was used to contain the fluid leakage that I have mentioned above;

- v. **SDP1/20** shows **Ms Ensell** in the same position as described above, but I have taken this photograph as a close-up shot of Ms Ensell (and slightly later in the morning, as is clear from the lighter sky). Ms Ensell's face is partially visible in this photograph, and she appears to have long blonde hair;
- vi. **SDP1/21** shows **Mr Wade** sitting on the ground next to the rear passenger side wheel of the van. Mr Wade is wearing dark clothing, but his face and head are uncovered and he is looking directly at the camera. He has short hair on one side of his head, and longer hair with blue/green tinting on the other side. Mr Wade's left arm is inserted into the tube-like opening in the van. Again, the white sand used to contain the fluid leakage from the van can be seen on the ground around the rear of the van.

55. I also exhibit two photographs that were taken later in the day, after Ms Ensell and Mr Wade had been released from the lock-on, which show in further detail the concrete reinforcement and lock-on device that I have described above. These photos were taken by a member of staff at the Shipley Site and were sent to me by email at 1:15pm.

- i. **SDP1/22** is taken from the rear of the van. The rear doors are open, and the concrete block can be seen. The concrete has been damaged by police officers, who had been working with heavy duty power tools to release Ms Ensell and Mr Wade (discarded concrete can be seen on the floor around the van); and
- ii. **SDP1/23** is taken from the side of the van and shows the black tube-like opening into which either Ms Ensell or Mr Wade inserted their arm. It is not obvious from which side of the van this photograph is taken but, when compared to the photograph of Mr Wade during the lock-on, it appears that this photograph is most likely the passenger side of the van. The police have needed to cause significant damage to the van when working to free Mr Wade or Ms Ensell (they have cut away some of the body work of the van).

56. A significant police response was required to resolve the incident with Ms Ensell and Mr Wade on 28 January 2025. That response included the deployment of several specialist

officers in protective clothing who used heavy duty power tools (such as disc cutters) to cut through the van and concrete reinforcement in an attempt to release Ms Ensell and Mr Wade; these officers were operating the cutting equipment for several hours.

57. However, since 28 January 2025, I have learned that it was not in fact the police who released Ms Ensell and Mr Wade. Rather, I was informed by my staff that Ms Ensell and Mr Wade self-released from the lock-on before the police were able to release them, and that Mr Wade in particular had become distressed by the incident by that time.

58. Even though Ms Ensell and Mr Wade were released from the lock-on at around 12:30pm, the police were not able to remove the van from its position in front of the gate until 1:50pm. Therefore, all vehicular access to the Shipley Site (and egress) was blocked for around 9 hours on 28 January 2025 as a result of this incident.

59. The police officers in attendance at the Shipley Site conducted a search of the van at the Site. I observed the items that the police recovered, which included a large tin that was branded as cooking oil, and some red paint in a smaller tin.

60. The last of the police officers in attendance and responding to the incident left the Shipley Site at approximately 3:30pm.

61. Finally, and for the purposes of full and frank disclosure, I understand from the on-call manager who was managing Teledyne UK's response prior to my arrival at the Shipley Site that, at around 6:40am, other protestors began to arrive at the site. No complaint is made in relation to how these protestors conducted themselves. At approximately 9am, that being after I had arrived at the Shipley Site, a further group of protestors who appeared to be associated with the group known as Bradford Friends of Palestine attended Acorn Park at

the junction with the A6038 Otley Road and conducted a protest. Again, no complaint is made in relation to how these protestors conducted themselves.

### ***Impact of the incident***

62. Two of the retractable bollards protecting the gate to the Shipley Site were damaged by the van. These needed to be replaced at a cost of £3,402.16 (excluding VAT). The bollards were replaced overnight on 28-29 January 2025.

63. As I have explained above, all vehicular movements into and out of the Shipley Site were blocked whilst Ms Ensell and Mr Wade were locked-on to the van, and whilst the van remained in situ after their release. As such, all vehicular movements into and out of the Shipley Site were blocked for around 9 hours on 28 January 2025, which covered the working day. The consequences of the obstructed access include:

- i. disruption to staff access at the Shipley Site. Approximately 100 staff work at the Shipley Site on a day-to-day basis, the majority of whom arrive by car. Staff were unable to access the site by vehicle throughout the course of the incident, and were forced to park away from the site and enter by foot. As Acorn Park was disrupted because of the incident and significant presence of the emergency services, some staff were forced to park around a 5 minute walk from the site. For most staff, this was an inconvenience. However, for one member of staff who has a disability, the inability to access the site by vehicle was especially problematic and distressing. They were forced to park away from the site and be assisted into work by colleagues. Ultimately, all staff were able to access the site on foot, and were on site by around 8:30am. Therefore, the start of the working day at the site was delayed and disrupted, but the day-to-day business of the site could be conducted; relatedly
- ii. the displacement of the parked Teledyne UK staff cars onto surrounding roads would likely have caused inconvenience to our neighbours and other road users;
- iii. delivery vehicles were unable to access the Shipley Site. However, as the delivery vehicles were able to park reasonably close by, staff from the Shipley Site were able



to assist with carrying goods from delivery vehicles into the site. Therefore, whilst the re-allocation of staff to this task caused further disruption to the working day at the Shipley Site, all scheduled deliveries to the site were made successfully.

64. At the height of the incident, I estimate that I observed there to be approximately 30 police officers present. This included specialist officers in protective clothing using heavy duty power tools, as well as what appeared to be evidence gathering officers with camera equipment. As mentioned above, the last police officer left the Shipley Site at around 3:30pm. Further, until approximately 2pm, there was a presence from the ambulance service at the Shipley Site.

65. The incident also caused disruption to the road network and other businesses on Acorn Park. I understand from those present at the Shipley Site at the start of the incident that the police initially established a cordon at around 5:15am. The cordon started about half way down Acorn Park from the junction with the A6038 Otley Road, which meant that four other business on Acorn Park could not be accessed. This cordon remained in place until around 8:30am, at which time the cordon was moved closer to the Shipley Site, so that the other businesses on Acorn Park could open for business. However, the printing business at the end of Acorn Park (beyond the Shipley Site) was unable to receive delivery vehicles until around 3pm. The police also maintained a manned cordon at the junction of Acorn Park and the A6038 Otley Road until approximately 3pm, so that they could monitor who was accessing the area. I assume, but I do not know for sure, that this would have reduced passing trade and footfall to our neighbours' businesses. Overall, there was significant disruption caused to our neighbours on Acorn Park as a result of the protest incident.

66. Lastly, many of the staff at the Shipley Site are concerned about being identified by members of the protest groups that attend the Shipley Site; specifically, many of the staff are concerned that, if their identities were known, they may be singled out for unpleasant abuse (both at, and perhaps also away from, the Shipley Site). I am informed by some of the staff who were forced to enter and/or exit the site on foot on 28 January 2025 that they were distressed at having to walk past not only Ms Ensell and Mr Wade, but also the other protestors that were (peacefully) assembling; they felt vulnerable and exposed, and they would not ordinarily feel that way when able to access the site from the relative safety of a

moving vehicle. In an effort not to be identified, some staff elected to cover their heads and faces when entering and exiting the site that day.

### **18 February 2025: Persons Unknown**

67. On 18 February 2025, shortly before 1.45am, three unidentified persons attended the Shipley Site, positioned a small ladder against the fence, and threw multiple glass bottles (or similar) over the fence and towards a building on the site. The bottles were full of red paint, and smashed on impact, causing the paint to splash on and around the building. I exhibit at **SDP1/24 – 25** two photographs that show the smashed bottles and red paint. These photographs were taken by Teledyne UK staff at the Shipley Site.

68. The incident occurred at the rear fence line to the Shipley Site. It appears that the unidentified persons used the aforementioned public footpath(s) to access the wooded area at the rear of the Shipley Site, before proceeding to the fence line and throwing the ‘paint bombs’. Fortunately, the damage caused by the paint bombs was minor; staff at the Shipley Site were able to clear the broken glass, and the paint will be washed away.

### **OBSERVATIONS ON THE EFFECTIVENESS OF THE INJUNCTION**

69. Since the grant of the first injunction in December 2024, there has been a noticeable improvement in the day-to-day situation at the Shipley Site. Prior to the injunctive relief, in the last quarter of 2024, it was becoming an increasingly frequent occurrence that protestors would obstruct access to the Shipley Site, sometimes for hours at a time. Whilst the police tried to manage the situation, they were not always successful in doing so, and it was often not possible to enter or exit the Shipley Site by vehicle during these protests, which disrupted business at the site.


70. Since the grant of injunctive relief, and leaving aside the exceptional incident on 28 January 2025, there have been no incidents in which access to the Shipley Site has been obstructed. Protestors still attend outside and proximate to the Shipley Site and conduct protests, as they are entitled to do, and they convey their message and make their views known. There

is however a much better co-existence between the protestors and Teledyne UK, and access to the site is not obstructed.

71. There have of course been two incidents since the grant of injunctive relief in December 2024. However, the incident on 18 February 2025 was, thankfully, very minor.

### 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.

Signed by:  
  
.....31711AE08EA84E4.....  
Scott Douglas Patterson  
Dated this 21 day of May 2025