

Nicholas James Wargent

Claimant

Fourth Statement

Exhibit NJW4

[23 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

**FOURTH WITNESS STATEMENT OF
NICHOLAS JAMES WARGENT**

I, **NICHOLAS JAMES WARGENT**, of 106 Waterhouse Lane, Chelmsford, Essex, CM1 2QU, will state as follows –

1. I am a director of the Claimant, Teledyne UK Limited (**‘Teledyne UK’**). Teledyne UK is a wholly owned subsidiary of Teledyne Technologies Incorporated, a New York Stock Exchange listed company (together the **‘Teledyne Technologies Group’**). The Teledyne Technologies Group’s operations are primarily located in the United States, the United Kingdom, Canada, and Western and Northern Europe.
2. I am also an in-house solicitor and General Counsel for the Europe, Middle East and Africa, and Asia-Pacific regions for the Teledyne Technologies Group, and I am duly authorised to make this witness statement on behalf of Teledyne UK.
3. 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.
4. 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 exchanges of emails with Teledyne UK's legal advisers.

5. There is now produced and shown to me a paginated bundle of true copy documents marked **NJW4**. All references to that bundle are in the format **NJW4/page number**.

Scope of this statement

6. This witness statement supplements the other witness statements that have been made in these proceedings. For the avoidance of doubt Teledyne UK continues to rely on those witness statements and the content therein, and in the interests of proportionality I will not repeat all the same information in this statement. To be clear, my earlier witness statements are:

- i. my first witness statement dated 13 December 2024 (my '**first witness statement**');
- ii. my second witness statement dated 19 December 2024 (my '**second witness statement**'); and
- iii. my third witness statement dated 15 January 2025 (my '**third witness statement**').

7. In this statement, I shall address the following:

- i. service of the Tipples J and Murray J Orders;
- ii. further incidents of protest since January 2024;
- iii. further evidence relating to the 2024 incidents at the Wirral Site;
- iv. apprehension of further acts of protest;
- v. additional information.

8. To assist the Named Defendants, specific evidence in relation to each can be found in the following paragraphs:
- i. D2 Ruby Hamill: 64(i);
 - ii. D5 Ricky Southall: 62, 64(ii), 82 and 83;
 - iii. D6 Amareen Afzal: 80 to 83;
 - iv. D7 Serena Fenton: 64(iii) and 82 to 83;
 - v. D14 Autumn Taylor-Ward: 46 to 53, and 62;
 - vi. D16 Lara Downes: 54 to 59;
 - vii. D17 Gabriella Middleton: 54 to 59;
 - viii. D19 Mary Ensell: 19 to 22; and
 - ix. D20 Harry Wade: 19 to 22.

SERVICE OF THE TIPPLES J AND MURRAY J ORDERS

9. The Order of Tipples J dated 24 January 2025 lists, and gives directions to, the final hearing of the Claim against the Named Defendants (save for D19 Mary Ensell and D20 Harry Wade) and the review of the Order against Persons Unknown. The Order of Murray J dated repeats those directions and listing for D19 Mary Ensell and D20 Harry Wade.
10. As such, those two Orders are, in effect, the notice of hearing, and I shall confirm service of those Orders below.
11. As to service of the Tipples J Order, I am informed by Teledyne UK's legal advisers (Keystone Law) that certificates of service have been filed with the court, and will be included in the trial hearing bundle. To prevent duplication, I will not exhibit those to this witness statement, but I confirm:
- i. On 27 January 2025, the Order of Tipples J was uploaded to the injunction website in accordance with paragraph 3(i) of the Order. I gave the instruction for the upload, and viewed the page once the Order had been uploaded. As I explained in my affidavit in support of the ongoing contempt application, the website went offline unexpectedly for a brief period between approximately 10pm on 27 January 2025 (after the Order had been uploaded) and 12.15pm on 28 January 2025, because of a

server configuration issue. The website remains online at the date of this witness statement and, to my knowledge, has done so ever since it was restored on 28 January;

- ii. Keystone Law inform me that on 27 January 2025, the Order of Tipples J was sent to the eleven email addresses in accordance with, and as set out in, paragraph 3(ii) of the Order;
- iii. Keystone Law inform me that on 27 January 2025, the Order of Tipples J was sent by first class post to the First to Seventh and Twelfth to Eighteenth Defendants, in accordance with paragraph 3(iii) of the Order.

12. I shall turn to explain the signs that are required in accordance with paragraph 3(iv) of the Tipples J and Murray J Orders shortly. Paragraphs 3(v) and 3(vi) were not engaged at the time of service of the Tipples J or Murray J Orders, and therefore did not fall to be complied with.

13. As to service of the Murray J Order, I am informed by Teledyne UK's legal advisers (Keystone Law) that certificates of service have been filed with the court, and will be included in the trial hearing bundle. To prevent duplication, I will not exhibit those to this witness statement, but I confirm:

- i. On 25 March 2025, the Order of Murray J was uploaded to the injunction website in accordance with paragraph 3(i) of the Order. I gave the instruction for the upload, and viewed the page once the Order had been uploaded;
- ii. Keystone Law inform me that on 24 March 2025, the Order of Murray J was sent to the eleven email addresses in accordance with, and as set out in, paragraph 3(ii) of the Order;
- iii. Keystone Law inform me that on 24 March 2025, the Order of Murray J was sent by first class post to the Nineteenth and Twentieth Defendants, in accordance with paragraph 3(iii) of the Order.

14. Both the Tipples J and the Murray J Orders require the placing of signs on the perimeters of the six Teledyne UK sites protected by the injunction (as indeed the Order of Bourne J did in December 2024). As to the placement of those signs:

- i. I explained at paragraph 35 of my third witness statement that the required signs were erected at the Wirral, Shipley, Lincoln and Presteigne Sites on 20 December 2024 to effect service of the Order of Bourne J dated 20 December 2024. Large signs were erected at the entrances to the Chelmsford Site on 20 December 2024, with further perimeter signage being added on 23 December 2024. The required signs were erected at the Newbury Site on 23 December 2024. I exhibited to my witness statement plans showing the locations of the signs at each site (exhibit NJW3/32-38), and certificates of service were included within the hearing bundle (and shall be included in the trial hearing bundle also). Those signs remain in situ, and therefore the requirement at paragraph 3(iv) of the Tipples J and Murray J Orders are met; and
- ii. further signs have also since been erected at the Chelmsford, Lincoln and Shipley Sites to ensure a better coverage of the perimeter of those sites. I exhibit at **NJW4/1-3** plans of the three sites that show the current location of the injunction signs. The plan of the Chelmsford Site is correct as of 31 January 2025. The plan of the Lincoln Site is correct as of 21 January 2025. The plan of the Shipley Site is correct as of 17 February 2025.

15. Accordingly, notice of the final hearing against the Named Defendants and the review of the Order against Persons Unknown has been served in accordance with the Tipples J and Murray J Orders.

FURTHER INCIDENTS OF PROTEST

16. Since my third witness statement, there have been several incidents of protest at and proximate to Teledyne UK's sites. All but two of these have been peaceful, and Teledyne UK makes no complaint about the peaceful and lawful protests. As I have emphasised before, Teledyne UK does not seek to stifle peaceful protest, and respects the right of citizens to engage in such protest; the same is an important right, which should be protected.

17. There have, however, been two further incidents of protest at the Shipley Site, of which Teledyne UK does complain, and upon which it relies when seeking final injunctive relief against **D19 Mary Ensell** and **D20 Harry Wade**, and also a continuation of the injunction against Persons Unknown. I shall out the details of these two incidents below.
18. As with my previous witness statements, I exhibit at **NJW4/4-8** a spreadsheet maintained by a colleague at Teledyne UK that records the incidents of protest at Teledyne UK's sites. That spreadsheet is updated to include further incidents to the date of this witness statement.

28 January 2025: Shipley Site, D19 Mary Ensell, D20 Harry Wade and Persons Unknown

19. Shortly before 5am on 28 January 2025, two vehicles attended the Shipley Site. One vehicle, a Vauxhall Vivaro van, was driven at speed into the bollards protecting the gate to the Shipley Site, where it was then abandoned (it becoming wedged on a bollard). The driver of the van remains unidentified; they left the scene in the second support vehicle.
20. **D19 Mary Ensell** and **D20 Harry Wade** arrived at the Shipley Site in the second support vehicle. After observing the van crash, they proceeded to lock onto the van, which had been reinforced with concrete to facilitate the lock-on. Specialist police officers used heavy duty tools to attempt to release Ms Ensell and Mr Wade from the lock-on, but they eventually released themselves at approximately 12:30pm.
21. Following this incident, Ms Ensell and Mr Wade were added as Named Defendants to these proceedings, and the injunction extended to cover them (see the Order of Murray J dated 21 March 2025). Contempt Applications have also been brought against both Defendants and, at the date of this witness statement, are still yet to be determined (but have now been listed for disposal on 28 and 29 July 2025). Ms Ensell and Mr Wade undertook this action under the banner of Palestine Action.
22. Scott Patterson, the Site Director of the Shipley Site, will give further details on this incident in his witness statement in support of the Claim.

18 February 2025: Shipley Site, Persons Unknown

23. Shortly before 1.45am on 18 February 2025, three unidentified persons attended the Shipley Site, positioned a small ladder against the fence, and threw multiple bottles (or similar) over the fence and towards a building on the Shipley Site. The bottles were full of paint, and smashed on impact, causing the paint to splash on and around the building.
24. Mr Patterson will give further details on this incident in his witness statement in support of the Claim.

10 March 2025: Keystone Law (Chancery Lane, London), Persons Unknown

25. I am informed by Teledyne UK's solicitors (Keystone Law) that, on the early morning of 10 March 2025, four unidentified protestors attended their London Offices (Chancery Lane), and smashed a window, and graffitied the building (including an inside reception area) and pavement with red paint, including the words 'DROP TELEDYNE'.
26. Whilst this was not an attack on Teledyne UK per se, it was clearly motivated by Keystone Law's association with Teledyne UK.
27. Manan Singh, Partner at Keystone Law, will give further details on this incident in a further witness statement in support of this Claim.

30 March 2025: Grenoble, Persons Unknown

28. Whilst not strictly relevant to the Claim, I should also draw the Court's attention to an incident that occurred at a site operated in Grenoble by another wholly-owned subsidiary of the Teledyne Technologies Group. This site is operated by Teledyne e2v Semiconductors SAS. The incident appears to have been carried out by supporters of a pro-Palestinian protest group, Europe Palestine Network, which is similar to Palestine Action, who have taken credit for the incident on social media.
29. In that incident, I am informed by my colleagues that approximately 30-50 protestors entered the site (although the relevant protest group claimed that about 100 protestors were

present), but not the building. I understand from colleagues that some windows were smashed, red paint and various graffiti was applied to fences and buildings on the site, and a handful of employees' cars were damaged.

30. I exhibit at **NJW4/9-10** two photographs of the damage to the Grenoble site, which have been passed to me by colleagues at the site.

10/11 May 2025: Black Sheep Coffee (Southampton Buildings, London), Persons Unknown

31. I am informed by Teledyne UK's solicitors (Keystone Law) that sometime over the weekend of 10/11 May 2025, posters were attached to a coffee shop near the firm's London offices. The poster named and carried a picture of Manan Singh, Partner at Keystone Law, who has conduct of this Claim, and stated that he was wanted for complicity in war crimes and genocide. The poster carried the Palestine Action logo.

32. Whilst this was not an attack on Teledyne UK per se, it was clearly motivated by Keystone Law's and Mr Singh's association with Teledyne UK.

33. Mr Singh will give further details on this incident in a further witness statement in support of this Claim.

15 May 2025: King's College London, Persons Unknown

34. I am also informed by Teledyne UK's solicitors (Keystone Law) that the same poster that appeared at Black Sheep Coffee over the weekend of 10/11 May was affixed to a library building at King's College London sometime around 15 May 2025.

35. Again, whilst this was not an attack on Teledyne UK per se, it was clearly motivated by Keystone Law's and Mr Singh's association with Teledyne UK. Mr Singh will give further details on this incident in a further witness statement in support of this Claim.

Summary

36. Incidents of protest do continue to occur at and proximate to Teledyne UK's sites. However, since the grant of the first without notice injunction in December 2024, there have only been two incidents of alleged unlawful protest at the Shipley Site, and no incidents of alleged unlawful protest at the five other sites protected by the injunctive relief. That shows a deceleration in the occurrence of alleged unlawful incidents, which had been accelerating in 2024, and especially in the last quarter of that year.
37. To that end, in my first witness statement I described specific incidents that Teledyne UK complained of and relied upon when seeking injunctive relief. One occurred in 2022, two occurred in 2023, and seven occurred in 2024 (or eight, after 19 December 2024 was included), five of which occurred from October 2024 onwards. The aforementioned spreadsheet also shows that incidents of protest at or proximate to Teledyne UK's sites have also been generally increasing, although Teledyne UK does not complain of many of those incidents, as they were lawful and peaceful protests.
38. Further, since the grant of injunctive relief, there have been no further instances of protestors standing in front of the gates to the Shipley Site and obstructing access, which was starting to become a feature of the protests at the Shipley Site, and which led to Teledyne UK seeking the additional protections in relation to that site. As the aforementioned spreadsheet shows, there have been several protests held outside and proximate to the Shipley Site, including by the Bradford Friends of Palestine group, whose supporters had taken to acts of obstruction prior to the grant of injunctive relief, but none of the recent protests have included any acts of obstruction in breach of the injunction.
39. Overall, my view is that the injunctive relief has been very effective, and has allowed the right balance to be struck, especially at the Shipley Site; protestors are still able to (and do) protest peacefully outside and proximate to the sites, but Teledyne UK's rights are also upheld and it is able to conduct its business without interference with access to or intrusion upon its sites. I attribute the improvement in the situation to the injunction; I note specifically that, in relation to the incident of 12 April 2025 outside the Shipley Site, the aforementioned spreadsheet records the observation that the organisers of the protest appeared to be referring to the injunction and warning those in attendance not to breach the

same (which appears to show that the alternative service orders made in these proceedings have been effective).

40. In the interests of full and frank disclosure, I should just note that two arrests were made by West Yorkshire Police in relation to the 12 April 2025 protest. These arrests were made because the individuals were capturing video or photographic content of the Shipley Site, which Teledyne UK considers is a 'prohibited place' under the National Security Act 2023, and such actions are prohibited. Further, as I also explained in my third witness statement, it is understood that supporters of Palestine Action have also in the past undertaken reconnaissance of the Shipley Site.

41. I do also note that the spreadsheet records that there is a police presence at the Shipley Site throughout even the peaceful protests. That is unsurprising given the FSC status of the Shipley Site and the defence products manufactured there. It is however clear, given the events prior to the grant of injunctive relief, that a police presence alone is insufficient to restrain acts of obstruction of access at the Shipley Site.

2024 INCIDENTS AT THE WIRRAL SITE

42. In this section of my witness statement, I shall provide some additional details in relation to incidents that have occurred at the Wirral Site. Again, and for the avoidance of doubt, Teledyne UK continues to rely on all previous witness statements in these proceedings, and the evidence set out therein at the final hearing of the Claim.

43. In my first witness statement, I described two incidents that occurred at the Wirral Site on 5 July 2024 and 2 October 2024. I explained that Merseyside Police attended the incidents and arrested the six protestors who were involved in each of those incidents, but that at the time of my witness statement I was unaware of the names of the arrestees.

44. In my third witness statement, I then explained that Merseyside Police had disclosed the names of the six arrested persons pursuant to the CPR 31.17 Orders made on 20 December 2024. These persons were then added as the Twelfth to Seventeenth Defendants to the proceedings.

45. I now understand from the further disclosure given by Merseyside Police that the Twelfth to Fourteenth Defendants were arrested at the Wirral Site on 5 July 2024, with the Fifteenth to Seventeenth Defendants being arrested at the Wirral Site on 2 October 2024.

5 July 2024: D14 Autumn Taylor-Ward

46. As I explained at paragraphs 97 to 101 of my first witness statement, at approximately 4.45am on 5 July 2024, three protestors used a van to ram the gates to Wirral Site. The protestors gained access to the site, but failed to gain access to the roof, despite attempting to do so. The protestors then proceeded to spray red paint on the site and the buildings.

47. Of the three protestors arrested at the Wirral Site on 5 July 2024, only **D14 Autumn Taylor-Ward** remains as a live defendant in the Claim.

48. As part of the CPR 31.17 disclosure, Merseyside Police provided Teledyne UK with the custody photo of Ms Taylor-Ward, which I exhibit at **NJW4/11**. Having considered that photo, it appears to me that Ms Taylor-Ward is shown in a social media post exhibited to my first witness statement at NJW1/196; she is captured in the picture in the top right of the X post, and appears to be in the back of a police vehicle.

49. As I explained in my first witness statement, all three protestors were arrested at the Wirral Site. I have reviewed the disclosure given by Merseyside Police, and specifically the MG11 witness statement of PC Beale (exhibited at **NJW4/12-13**), which records that Ms Taylor-Ward was arrested at 5.30am on 5 July 2024 (although the MG11 has a typographical error in relation to the date). Upon attendance at the Wirral Site by officers from Merseyside Police, Ms Taylor-Ward was located in the passenger seat of the van, and had locked herself in the vehicle. Police officers had to smash the passenger window of the van and open it from the inside to retrieve and detain Ms Taylor-Ward. PC Beale's MG11 witness statement notes that one of the other protestors was on top of the van, holding a red flare and shouting whilst recording the incident on their phone, and spraying red paint on the floor. The second accomplice was away from the van and on the premises holding a red flare and sledgehammer.

50. I also exhibit at **NJW4/14-16** the MG11 witness statement of PC Belfield, which gives further context to Ms Taylor-Ward's arrest, and in which PC Belfield records his observation of Ms Taylor-Ward passing a re-purposed fire extinguisher out of the van window to the protestor on top of the van, which they then used to spray paint around the surrounding area.
51. Finally, I also exhibit at **NJW4/17-19** the MG11 witness statement of PS Hicks, which again gives further context to Ms Taylor-Ward's arrest, and the incident as a whole. In that statement, PS Hicks records that the van was searched after Ms Taylor-Ward's arrest, and prior to the detention of the protestor on top of the van. Recovered in that search were a Dewalt angle grinder, crowbar, hammer and a further re-purposed fire extinguisher. I exhibit at **NJW4/20-24** exhibits DJH02-DJH06, which accompany PS Hicks' MG11 (exhibit DJH01 is body worn camera footage, which was not disclosed). Those photos show the van, the paint damage to the site and a Teledyne UK employee's car, as well as the items seized.
52. It appears to me from the Merseyside Police disclosure that Ms Taylor-Ward was arrested at the site on suspicion of criminal damage and aggravated trespass, and that pre-charge conditional bail was granted.
53. When preparing this updating witness statement, I requested an update from Merseyside Police on the progress of the criminal proceedings. On 16 May 2025, I was informed that the Crown Prosecution Service have authorised two charges against Ms Taylor-Ward: criminal damage over £5000 and conspiracy to cause a public nuisance. It is not clear to me what the timeline for the listing of any trial is, or what the bail status of Ms Taylor-Ward is at this time.

2 October 2024: D16 Lara Downes and D17 Gabrielle Middleton

54. As I explained at paragraphs 102 to 106 of my first witness statement, at approximately 5.55am on 2 October 2024, three protestors entered the Wirral Site and climbed onto the roof, where they proceeded to cause significant damage to the roof and to the production floor in the building underneath. I exhibited to my first witness statement photographs taken by Teledyne UK staff of the production floor, which had been damaged by the collapsing

roof and by items being thrown inside the building from the roof (including red paint), and also of the damaged roof and roof void.

55. Of the three protestors arrested at the Wirral Site on 2 October 2024, only **D16 Lara Downes** and **D17 Gabrielle Middleton** remain as live defendants in the Claim.

56. As part of the CPR 31.17 disclosure, Merseyside Police provided Teledyne UK with custody photos of these Defendants. To assist with the identification of the Defendants in subsequent exhibits, I exhibit the photos as follows:

- i. **NJW4/25** – D16 Lara Downes;
- ii. **NJW4/26** – Gabrielle Middleton.

57. As part of the CPR 31.17 disclosure, Merseyside Police also provided Teledyne UK with a series of still images captured by a drone that the police flew over the roof of the Wirral Site during the course of the incident. I exhibit a selection of those images at **NJW4/27-43**. The below image numbers are a reference to the annotated number in the top right corner of each image:

- i. Image 1 is a wide shot image of the roof of the building. One protestor can be seen in red overalls in the middle right of the roof, and two others in the middle/middle left. One protestor appears to be laying on their front, but it is hard to distinguish much else from this image;
- ii. Image 2 shows some damage to/a hole in the roof (middle right of the image). This damage was caused by the protestors. In the top left of the image, a protestor can be seen laying on their front looking into a hole in the roof, which the protestors have again made;
- iii. Image 3 shows Ms Downes and Ms Middleton on the roof. Ms Middleton is wearing a dark coloured coat over red overalls, and is crouching next to a large hole in the roof that has been made by the protestors, and is squirting a green substance (which I believe to be paint) through the hole. Ms Downes is also crouching/lying next to

the hole, and appears to be reaching in to it. Damaged and discarded roof remains can be seen around the hole;

- iv. Image 4 is a wider shot of the roof. Ms Middleton is standing on the roof, and Ms Downes is again lying next to and reaching into a large hole in the roof that has been made by the protestors. Towards the top right of the image, a second hole in the roof can be seen, with red paint splashed around the opening;
- v. Image 5 shows Ms Middleton on the roof, conferring with the third protestor. Three cans, which appear to be spray paint or similar, are on the roof next to them. The red overalls of the third protestor bear the words “Palestine Action”. A pickaxe rests between Ms Middleton and her accomplice, with damage to a nearby flue on the roof visible;
- vi. Image 6 is a close-up image of Ms Downes sitting on the roof, with her legs dangling through the hole that the protestors have made. Around her is broken and discarded roof, three jars (jam jars or similar) and an angle grinder in the foreground. Ms Downes appears to be lowering something through the hole and into the building by a blue rope. Subsequent images will show that it is likely to be a yellow-coloured angle grinder that is attached to the end of the rope;
- vii. Image 7 again shows Ms Downes reaching into the hole in the roof, with the blue rope, she is now lying on her front when doing so. Her red overalls bear the words “Palestine Action”. The third accomplice is in the foreground, using the pickaxe to damage the roof;
- viii. Image 8 is a close-up image of Ms Downes lying on her front reaching into the hole (whilst her face is not visible, she can be identified from her shoes). Next to Ms Downes, and attached to a blue rope, is a yellow-coloured angle grinder (which has some green markings on it – probably paint);
- ix. Image 9 is captured from directly overhead Ms Downes and Ms Middleton. Ms Middleton appears to have two crowbars with her. Ms Downes is reaching into the aforementioned hole (it appears with the angle grinder on the rope – which can be

seen in the image). There appears to be a green substance (which I believe is paint) splashed inside the hole;

- x. Image 10 is a close-up version of image 9, save that Ms Downes appears to be kneeling. The discarded green paint bottle can be seen in the top left of the image;
- xi. Image 11 shows a similar scene to images 9 and 10, but from a wider angle. The third protestor can be seen wielding a pickaxe to the right of the image;
- xii. Image 12 again shows a similar scene with Ms Middleton sitting next to the hole. In this image, it is clear that Ms Downes has the yellow-coloured angle grinder attached to the rope, and that she is dangling it into the building;
- xiii. Image 13 shows the three protestors on the roof together, next to the large hole that they have made and with their various paraphernalia scattered around. Ms Downes' face is clearly visible, allowing her to be identified. The third protestor is wielding a pickaxe and damaging a flue;
- xiv. Image 14 again shows the three protestors standing on the roof, the yellow angle grinder on the blue rope is visible;
- xv. Image 15 is a close up shot of Ms Middleton and Ms Downes standing on the roof, again allowing for their identification. Just behind Ms Middleton, a crowbar also appears to be attached to some blue rope;
- xvi. Image 16 is a close-up image of a smaller hole that has been made by the protestors in the roof. Ms Downes is inside the hole, looking upwards to Ms Middleton, who is crouching on the surface of the roof. Amongst the discarded roof remains, I note an item in the bottom left of the image which says "PALESTINE" on it. It appears to me that the item is a fire extinguisher, and I know that Palestine Action encourage the use of re-purposed fire extinguishers in their direction action (this is encouraged in the Underground Manual, for example); finally

xvii. Image 17 shows Ms Middleton standing on the roof, behind her, the re-purposed fire extinguisher is visible. The third protestor appears to be tugging at the edge of the hole in the roof, with the pickaxe lying beside her.

58. As I explained in my first witness statement, all three protestors were arrested at the Wirral Site. I have reviewed the disclosure given by Merseyside Police, and specifically the MG11 witness statements of PC Swanson and PC Thomson (exhibited at **NJW4/44-50**), which record that both Ms Middleton and Ms Downes were arrested at 10.15am on 2 October 2024 by police officers who has entered the building in protective public order kit. Police officers located Ms Middleton and Ms Downes in the roof space above ‘Clean Room 2’, where officers observed the protestors smashing through the roof and throwing items down into the building (knocking down air vents in the process). Once located, Ms Middleton and Ms Downes agreed to leave the roof space via a ladder, and were arrested. It appears to me from the Merseyside Police disclosure that Ms Middleton and Ms Downes were arrested at the site on suspicion of burglary, criminal damage and aggravated trespass, and that pre-charge conditional bail was granted.

59. When preparing this updating witness statement, I requested an update from Merseyside Police on the progress of the criminal proceedings. On 16 May 2025, I was informed that Ms Downes and Ms Middleton are still on pre-charge bail, and that Merseyside Police continue to build the case against them. That pre-charge bail is due to expire on 18 June 2025, by which time Merseyside Police hope to have a charging decision. The charges being considered are burglary with intent to cause damage, criminal damage and public nuisance.

APPREHENSION OF FURTHER ACTS OF PROTEST

Named Defendants

60. As I explained in my first and third witness statements, each of the Named Defendants have been arrested at a Teledyne UK site throughout 2024 in relation to alleged acts of unlawful direct-action protest (in the case of **D19 Mary Ensell** and **D20 Harry Wade**, the arrest occurred in January 2025).

61. The court will by now be aware that several Named Defendants elected to settle these proceedings by way of an undertaking. Save for the two persons that I shall mention below, no Named Defendant who remains live in these proceedings has elected to acknowledge service, defend or engage with the Claim in any way; although on 19 May 2025 I understand that a notice of acting was received from Robert Lizar Solicitors in relation to **D20 Harry Wade**, but that those solicitors have not yet confirmed whether they act in the injunction or contempt proceedings, or both, despite having been asked several times by Keystone Law.

62. Two Named Defendants are in a slightly unusual position in that they signed the relevant consent order, but neglected to sign the undertaking and, despite having since been chased by Teledyne UK's solicitors several times for the signed undertaking, have failed to return the same. Accordingly, in the absence of a signed undertaking, Teledyne UK continues to treat those two Named Defendants as live defendants to the proceedings. Those two persons are **D14 Autumn-Taylor Ward** and **D5 Ricky Southall**.

63. On the basis that the remaining Named Defendants have all committed acts of alleged unlawful direct-action protest at Teledyne UK sites, have not promised to the court that they will not commit further similar acts and, save for the two exceptions noted above, have not engaged at all with the Claim, Teledyne UK continues to apprehend that these Named Defendants will commit further acts of unlawful direct-action protest at Teledyne UK's sites.

Named Defendants: propensity to commit unlawful direct-action protest

64. In preparing this witness statement, I have also viewed material online that suggests that some of the remaining Named Defendants continue to actively engage in direct action-protest, motivated by a pro-Palestinian sentiment. In particular:

- i. **D2 Ruby Hamill** – the Edinburgh reporter published an article dated 6 March 2024, in which it named a Ms Ruby Hamill as one of three protestors who climbed the exterior of the UK Government Building in Edinburgh, Queen Elizabeth House, sprayed the building with red paint, and flew a Palestinian flag from the building. I exhibit a copy of the article at **NJW4/51-54**, which can also be viewed at:

<https://theedinburghreporter.co.uk/2024/03/protesters-climb-the-outside-of-queen-elizabeth-house/>;

- ii. **D5 Ricky Southall** – Sky News published an article dated 7 April 2025, which details an incident at the Trump Turnberry golf course in South Ayrshire, Scotland. The article explains that the clubhouse was defaced with red paint, and the greens also damaged, at around 4.40am on 8 March 2025. A Mr Ricky Southall is named as one of those arrested in relation to the incident. Given the stated location of Mr Southall’s arrest, and the known address of Mr Southall, I believe that this is likely to be D5 Mr Southall. I exhibit a copy of the article at **NJW4/55-58**, which can also be viewed here: <https://news.sky.com/story/man-and-woman-in-court-over-damage-to-trump-turnberry-golf-resort-in-scotland-13343856>. Notably, on 8 March 2025, Palestine Action also published a news article on its website, taking credit for the attack. I exhibit that article at **NJW4/59-60** (<https://palestineaction.org/trump-golf/>);
- iii. **D7 Serena Fenton** – BBC News published an article on 29 January 2025 in which it is said that a Ms Fenton (of an address that matches the address of D7 Ms Fenton) has been charged with racially intentional harassment and using threatening or insulting words to cause harassment, in relation to her alleged displaying of antisemitic posters. Whilst this is not direct-action of the kind complained of in this Claim, it does show a tendency for extreme actions. I exhibit a copy of the article at **NJW4/61** (<https://www.bbc.co.uk/news/articles/czx848ywr8ro>).

65. These Defendants have a clear propensity for direct-action protest, which heightens Teledyne UK’s apprehension of further direct-action protest being committed at its six sites by these persons.

Palestine Action

66. In my first witness statement, I explained that Palestine Action was one of two key groups with whom Teledyne UK were concerned (the other being Bradford Friends of Palestine, albeit their tactics appear to be less aggravated than those of Palestine Action). The group expressly encourage the targeting of Teledyne UK’s sites that are now protected by the

injunctive relief with direct-action protest, including through the content in the so-called ‘Underground Manual’ published by the group and exhibited to my witness statement. All methods of protest encouraged are unlawful, and include various suggestions of property damage and trespass.

67. I also explained in my first and third witness statements how Palestine Action host direct-action training days for its followers, and actively sought new recruits to its cause.

68. In preparing this witness statement, I have again reviewed the Palestine Action website. I can see that the website’s appearance has been updated; however, the content remains very much the same, including:

- i. at **NJW4/62** I exhibit a copy of the homepage, as it displays on 2 May 2025 (<https://palestineaction.org>). Midway down the page, there are links to pages titled ‘Direct Action Trainings’, ‘Online Crash Course’ and ‘Fund the Movement’. At the bottom of the page, there are six links to specific direct action training days that are taking place throughout the UK in the coming months;
- ii. at **NJW4/63** I exhibit a copy of the ‘Join the Resistance’ page, as it displays on 2 May 2025 (<https://palestineaction.org/join/>). That page provides various links to the various pages on direct action training days, online crash courses and workshops, with a ‘Join Palestine Action’ form appearing at the bottom of the page, in which it asks potential new joiners if they are interested in undertaking direct action;
- iii. at **NJW4/64** I exhibit a copy of the ‘Direct Action Training Days’ page, as it displays on 2 May 2025 (<https://palestineaction.org/trainingday/>). At the bottom of the page there are links to sign up to training days being hosted across the country throughout May and June 2025.

69. The so-called ‘Underground Manual’ also continues to appear on the Palestine Action website (some links on the website refer to the Manual as the ‘Underground Guide’, but it is the same PDF Manual exhibited to my first witness statement). When first I re-reviewed the Palestine Action website to prepare this updating witness statement, all links that I tried to access the Underground Manual were broken, and I could not access the Manual. The

Manual was however referred to many times across the website, and the links to the document remained in situ. As of 20 May 2025, I can confirm that some (but not all) links to the Underground Manual on the website are again working.

70. I also note that the ‘About Us’ page also now contains the following description of the group, under the heading ‘Our Target’:

Palestine Action’s main target is Elbit Systems, Israel’s biggest weapons producer. For different local contexts, Palestine Action also primarily target weapons companies such as Leonardo, Thales and Teledyne. In addition to shutting down weapons manufacturers, our campaign also targets companies and institutions linked to them.

I exhibit a copy of the webpage, as it appears on 2 May 2025, at **NJW4/65** (<https://palestineaction.org/about/>).

71. Palestine Action remain extremely active, and continue their programme of direct action. The ‘News’ page of the group’s website contains links to several articles in which it documents the direct action taken by its supporters. To give just a few recent examples:

- i. **NJW4/66-67** – is an article published on 14 May 2025, in which the group details that the offices of both Edwards Accountants in Birmingham and JP Morgan at Victoria Embankment in London were targeted in the early hours of that morning because of their association with Elbit Systems UK. The article described that both buildings were covered in red paint, and that the front glass doors of JP Morgan were shattered;
- ii. **NJW4/68-69** – is an article published on 18 April 2025, in which the group details how five branches of the insurer Allianz were targeted overnight because of its association with Elbit Systems UK. The article described that the premises had their windows smashed, and were coated in red paint and daubed with the message ‘Drop Elbit’;
- iii. **NJW4/70-71** – is an article published on 16 April 2025, in which the group details that two activists occupied the roof of ‘GRiD Defence Systems’, which is a supplier

to Elbit and manufacturer of components with military end uses. The article also reminds readers that the same site was targeted in June 2024;

- iv. **NJW4/72-73** – is an article published on 14 April 2025, in which the group details co-ordinated actions at an Elbit site in Leicester, and a branch of Allianz in Bristol (a lock-on and occupation respectively), and claims responsibility for an overnight action at an Aviva site, in which damage was caused;
- v. **NJW4/74-76** – is an article published on 7 April 2025, in which the group details action at five offices of Scottish Enterprise, because of its association with Leonardo UK and Thales UK;
- vi. **NJW4/77-78** – is an article published on 31 March 2025, in which the group details that activists were occupying the roof of the Dean Group facility in Manchester, having smashed windows and solar panels, and covered the building in red paint. The article reminds readers that the same site was targeted in July 2024;
- vii. **NJW4/79-80** – is an article published on 21 March 2025, in which the group details actions at Keysight Technologies and Allianz (Glasgow), which included what appears to be significant property damage. The article references action that had also been taken at a Leonardo site the previous day;
- viii. **NJW4/81-82** – is an article published on 15 March 2025, in which the group details how, that morning, supporters of the group attended Elbit System’s Bristol headquarters for the 17th time. The article describes that the protestors used a cherry picker vehicle, with one activist locked-on inside the vehicle, and others in the bucket lift damaging the roof of the premises (including by the use of paint, and swinging a sledgehammer on a rope to smash the windows of the premises).

72. There are several articles of a similar nature, all of which can be found on the ‘News’ webpage <https://palestineaction.org/news/>, and I have only exhibited a recent and representative sample. At the date of this statement, I count 24 articles detailing new actions in which property damage has been caused and/or occupation of sites has been undertaken since the return date in these proceedings on 24 January 2025. There are also several articles

updating readers on the progress of various criminal proceedings and the circumstances of protestors charged with protest-related offences (some of whom are on remand in custody), as well as re-publicising earlier acts of direct-action protest. I note that there are two articles on incidents of direct-action that are alleged to have been undertaken at Shannon Airport, in which the Irish arm of Palestine Action claim they entered the runway of the airport.

73. The above record of incidents of direct-action are supported and supplemented by the Instagram and X pages operated by Palestine Action, which social media pages I have discussed in previous witness statements. In the interest of proportionality, I will not replicate the content of each of those posts, but simply observe that the group remains active on those platforms. Often, several posts are made to the accounts per day, detailing matters such as recent and historic acts of direct-action (undertaken both nationally and internationally), updating on criminal proceedings involving the group's supporters and publicising various protest-related events.

74. Considering all of the above, it is clear that Palestine Action remains active, continues to encourage unlawful acts of protest, and continues to recruit and train new members. Teledyne UK therefore apprehends that, absent a continuation of the injunctive relief against Persons Unknown, it will suffer further acts of unlawful direct-action protest committed by those who are associated with or support Palestine Action and/or its cause, and whose identities are unknown.

Ceasefire

75. In advance of the return date hearing on 24 January 2025, Manan Singh of Keystone Law (Teledyne UK's legal advisers), made his third witness statement dated 23 January 2025. That witness statement updated the court on matters that had occurred between me signing my third witness statement, and the hearing date. In that statement, Mr Singh informed the court of the ceasefire that had been agreed in the Gaza conflict, but explained that this did not alleviate Teledyne UK's apprehension of future protests, especially in light of subsequent actions and statements put out by Palestine Action.

76. I am informed by Teledyne UK's legal representatives who attended the return date that, one of the reasons why Tipples J was concerned not to make the five-year order with annual

review at that hearing was because the Judge expressed the view that the effect of the ceasefire on protest activity was not yet fully known.

77. I understand from national and international news coverage that the ceasefire has now broken down (having done so in mid-late March 2025), and that the Gaza conflict is now active again. By way of example, I exhibit at **NJW4/83-85** an article published online by the BBC on 4 May 2025, which notes that breakdown of the ceasefire, and briefly discussed the renewed Israeli offensive in Gaza. Accordingly, given the ongoing conflict, Teledyne UK continues to apprehend further acts of unlawful direct-action protest at its sites by pro-Palestinian protestors.

78. In any event, having worked in my industry for some time, and prior to the current outbreak of active conflict in Gaza in October 2023, I can confirm that pro-Palestinian protests are not a product of the current conflict, and have been long-standing (albeit perhaps not as intense as they are now). The spreadsheet referred to above and exhibited **NJW4/4-8** is evidence of the same, as Teledyne UK felt the need to start keeping a record at of protest incidents from December 2022 (which was a protest event by Palestine Action). There are also other disputes and disputed territories in the region outside of the current iteration of the Gaza conflict, which have been long-standing. It is an unfortunate reality that, even if the ceasefire had held, there are still Israel-Palestine issues which are the cause of great unrest, and which motivate direct-action protest.

79. Accordingly, even had the ceasefire held, Teledyne UK would still have apprehended further acts of direct-action protest at its sites. Now that the ceasefire has broken down, Teledyne UK's apprehension of further protest is heightened further, and such acts are considered even more likely to occur.

ADDITIONAL INFORMATION

D6: Amareen Afzal

80. Finally, when looking at material online relating to the remaining Named Defendants, I have seen a crowd-funding campaign operated by **D6 Amareen Afzal**. I exhibit a copy of the webpage at **NJW4/86-87** (<https://www.gofundme.com/f/justice-for-gaza-legal-fund->

[for-action-against-war-machine](#)). The page was created on 9 July 2024, and Ms Afzal is crowd-funding to cover legal fees. In the statement on the page, Ms Afzal has admitted her part in the incident on 15 May 2024 at the Shipley Site, and has written:

My name is Amareen, I am an activist with Palestine Action, based in Leeds, and I'm raising funds to cover legal costs for taking direct action against Teledyne Defence and Space, a US-owned company manufacturing arms which have been deployed by Israel against Gaza.

On Nakba Day this year, myself and three other activists occupied the Teledyne factory, dismantled the roof, and shut down their operations to disrupt their role in the ongoing genocide in Gaza, and the continued ethnic cleansing of Palestine. As a result, we are now facing trial in September next year.

81. The crowd funding page also carries the same photograph that I exhibited to my first witness statement at NJW1/185.

Trial of D5 (Ricky Southall), D6 (Amareen Afzal) and D7 (Serena Fenton)

82. I understand from Teledyne UK's legal advisers that Mr Patterson has explained in his witness statement that he has recently attended and given evidence in the trial of the criminal proceedings against the Fifth to Seventh Defendants (inclusive) in relation to the incident that took place at the Shipley Site on 15 May 2024.

83. After Mr Patterson signed his witness statement, a verdict was given in those proceedings. On 22 May 2025, the Fifth to Seventh Defendants (inclusive) were all found guilty of criminal damage and carrying items to commit criminal damage. Further, D5 Ricky Southall was found guilty of burglary. I understand from West Yorkshire Police that sentencing is expected to take place in two weeks.

The fourth Shipley Site protestor on 15 May 2024

84. Finally, in the interests of full and frank disclosure, I should update the court on one matter. At paragraph 122 of my first witness statement, I explained that the fourth person arrested


at the Shipley Site on 15 May 2024 was not named as a defendant in the Claim because, at the time the Claim was issued, that person remained on remand in custody and therefore Teledyne UK did not apprehend that they would commit further imminent acts of unlawful direct-action protest at Teledyne UK's sites. That person was released from custody earlier this year, and was a defendant in the recent abovementioned trial at Bradford Crown Court (along with the Fifth to Seventh Defendants inclusive) in relation to the events on 15 May 2024 (and was also found guilty of criminal damage and carrying items to commit criminal damage). I understand from Teledyne UK's legal advisers that Mr Patterson will give further details on the trial in his witness statement, and I have updated the court on the outcome of the trial above. At this time, in all the circumstances of the case, Teledyne UK has elected not to add this fourth person as a Named Defendant to the proceedings; whilst they pleaded not-guilty to the alleged offences in relation to 15 May 2024, it is hoped that the period spent in custody will cause this person to change their behaviour, such that they should not need to be subject to the injunction as a Named Defendant.

CONCLUSION

85. Teledyne UK continues to apprehend imminent acts of unlawful direct-action protest at its six sites currently protected by the Orders of Tipples J dated 24 January 2025 and Murray J dated 21 March 2025.
86. As to Persons Unknown, it is clear that the primary group with which Teledyne UK is concerned, that being Palestine Action, continues to be active and engaged in such unlawful acts, whilst also continuing to train and recruit new members. As to the Named Defendants who remain live in these proceedings, they have elected not to settle the proceedings by way of undertaking and promise to the Court that they will not again engage in acts of unlawful direct-action at the six Teledyne UK sites.
87. In the circumstances, Teledyne UK respectfully asks that final injunctive relief is granted against the remaining Named Defendants, and a five-year order subject to annual review is made against Persons Unknown. The relief sought goes no further than is necessary to protect Teledyne UK's rights as landowner, whilst balancing the important rights of the Named Defendants and Persons Unknown to protest peacefully at and proximate to the six Teledyne UK 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.

DocuSigned by:

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Nicholas James Wargent

Dated this 23 day of May 2025