

**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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**HEARING BUNDLE INDEX FOR  
FINAL HEARING ON 25 JULY 2025  
(PROCEDURAL BUNDLE)**

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<b>Tab.</b>	<b>Document</b>	<b>Date</b>	<b>Page</b>
<b>A</b>	<b>Orders</b>	<b>Date</b>	<b>Pages</b>
1	Sealed Order of Tipples J	24 January 2025	5 - 23
2	Sealed Order of Murray J	21 March 2025	24 - 41
3	Sealed Order of Bourne J	20 December 2024	42 - 58
4	Sealed CPR 31.17 Disclosure Order (West Yorkshire Police)	20 December 2024	59 - 62
5	Sealed CPR 31.17 Disclosure Order (Merseyside Police)	20 December 2024	63 - 65

6	Sealed CPR 31.17 Disclosure Order (Merseyside Police)	20 December 2024	66 - 69
<b>B</b>	<b>Claim Forms</b>	<b>Date</b>	<b>Pages</b>
7	Sealed Re-Amended Claim Form (with Schedules and Annexe)	24 March 2025	70 - 81
8	Sealed Amended Claim Form (without Schedules and Annexe)	27 January 2025	82 - 84
9	Sealed Claim Form (without Schedules and Annexe)	13 December 2024	85 - 87
<b>C</b>	<b>Application Notices</b>	<b>Date</b>	<b>Pages</b>
10	Application Notice (add further Named Defendants)	13 February 2025	88 - 95
11	Application Notice (continuation of injunctive relief and to add further Named Defendants)	16 January 2025	96 - 103
12	Application Notice (injunctive relief and alternative service)	13 December 2024	104 - 110
<b>D</b>	<b>Certificates of Service</b>		
	<b>Erection of signs (including relevant plans)</b>	<b>Date</b>	<b>Pages</b>
13	Certificate of Service - Wirral, Shipley, Lincoln and Presteigne	13 January 2025	111 - 118
14	Certificate of Service - Chelmsford and Newbury	13 January 2025	119 - 123
15	Lincoln (21 January 2025 additional signs)	06 June 2025	124 - 128
16	Chelmsford (31 January 2025 additional signs)	06 June 2025	129 - 133
17	Shipley (17 February 2025 additional signs)	06 June 2025	134 - 138
	<b>Tipples J Order</b>	<b>Date</b>	<b>Pages</b>
18	Named Defendants D1 – D7 and D12 – D18	27 January 2025	139 - 142
19	Website	27 January 2025	143 - 145
20	Persons Unknown (email)	27 January 2025	146 - 149
	<b>Murray J Order</b>	<b>Date</b>	<b>Pages</b>
21	Named Defendants D19 and D20	24 March 2025	150 - 154

22	Persons Unknown (email)	24 March 2025	155 - 158
23	Website	26 March 2025	159 - 161
	<b>Claimant's Further Evidence</b>	<b>Date</b>	<b>Pages</b>
24	Named Defendants D1 – D7 and D14, D16 and D17	28 May 2025	162 - 165
25	Named Defendants D19 and D20	28 May 2025	166 - 169
26	Robert Lizar Solicitors re D19 and D20	28 May 2025	170 - 172
27	Persons Unknown (email)	28 May 2025	173 - 176
28	Website	28 May 2025	177 - 179

**PENAL NOTICE**

**IF YOU THE BELOW NAMED DEFENDANTS OR PERSONS UNKNOWN OR ANY OF YOU DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.**

**ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.**

**IN THE HIGH COURT OF JUSTICE**  
**KING'S BENCH DIVISION**

**Claim No. KB-2024-004175**

**Before the Honourable Mrs Justice Tipples DBE**  
**Friday 24 January 2025**

**B E T W E E N :**



**KB-2024-004175**

**TELEDYNE UK LIMITED**

**Claimant**

**-and-**

**(1) JULIAN ALLEN GAO**

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**(8) PERSONS UNKNOWN WHO ARE WITHOUT THE CONSENT OF THE CLAIMANT ENTERING OR REMAINING ON LAND AND IN OR ON BUILDINGS ON ANY OF THE SITES LISTED IN SCHEDULE 2 TO THE CLAIM FORM, THOSE BEING:**

**A. THE ‘SHIPLEY SITE’ (TELEDYNE UK LIMITED, AIREDALE HOUSE, ACORN PARK, SHIPLEY BD17 7SW);**

**B. THE ‘LINCOLN SITE’ (TELEDYNE UK LIMITED, 168 SADLER ROAD, LINCOLN LN6 3RS);**

**C. THE ‘WIRRAL SITE’ (TELEDYNE UK LIMITED, UNIT A, 6 TEBAY ROAD, BROMBOROUGH, BIRKENHEAD, WIRRAL CH62 3PA);**

**D. THE ‘CHELMSFORD SITE’ (TELEDYNE UK LIMITED, 106 WATERHOUSE LANE, CHELMSFORD CM1 2QU);**

**E. THE ‘PRESTEIGNE SITE’ (TELEDYNE UK LIMITED, BROADAXE BUSINESS PARK, PRESTEIGNE LD8 2UH); AND**

**F. THE ‘NEWBURY SITE’ (TELEDYNE UK LIMITED, REYNOLDS NAVIGATION HOUSE, CANAL VIEW ROAD, NEWBURY RG14 5UR).**

**(9) PERSONS UNKNOWN WHO FOR THE PURPOSE OF PROTESTING ARE OBSTRUCTING ANY VEHICLE ACCESSING THE ‘SHIPLEY SITE’ (TELEDYNE UK LIMITED, AIREDALE HOUSE, ACORN PARK, SHIPLEY BD17 7SW) FROM THE HIGHWAY**

**(10) PERSONS UNKNOWN WHO FOR THE PURPOSE OF PROTESTING ARE OBSTRUCTING ANY VEHICLE ACCESSING THE HIGHWAY FROM THE ‘SHIPLEY SITE’ (TELEDYNE UK LIMITED, AIREDALE HOUSE, ACORN PARK, SHIPLEY BD17 7SW)**

**(11) PERSONS UNKNOWN WHO FOR THE PURPOSE OF PROTESTING ARE CAUSING THE BLOCKING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT SCHEDULE 3 TO THE CLAIM FORM**

**(12) – (18) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THIS ORDER AND ALSO AT SCHEDULE 1 TO THE CLAIM FORM**

**Defendants**

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**INJUNCTION ORDER**

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**UPON** the Claimant’s claim brought by way of a Part 8 Claim Form dated 13 December 2024 (the ‘Claim’)

**AND UPON** the Claimant making an application for interim injunctive relief by way of an Application Notice dated 13 December 2024 (the ‘Application’), which relief was granted on 20 December 2024 and which the Claimant now seeks to continue

**AND UPON** the Claimant making an application by way of an Application Notice dated 15 January 2025 to add further Named Defendants to the Claim and the interim injunctive relief

**AND UPON** the Court reading the witness statements listed in Schedule 2 to this Order

**AND UPON** the Court having particular regard to the importance of the Defendants’ Article 10 and Article 11 Convention rights to freedom of expression and freedom of lawful assembly

**AND UPON** the Court being satisfied that the Order does not prohibit peaceful protest

**AND UPON** the Court considering its discretion to grant injunctive relief pursuant to s37(1) of the Senior Courts Act 1981 and considering it just and convenient to do so

**AND UPON** the Court accepting the undertakings given in Schedule 3 to this Order

**AND UPON** the First to Seventh Defendants having been deemed served with the Claim Form on 16 January 2025 (at the latest), such that date by which they must acknowledge service and file and serve any evidence in defence is 13 March 2025 (in accordance with paragraphs 3 to 5 of the Order of Bourne J dated 20 December 2024)

**AND UPON** hearing Natalie Pratt of counsel for the Claimant

**AND UPON** the First to Seventh Defendants and the proposed Twelfth to Eighteenth Defendants not appearing and not being represented

**AND UPON** the Court being satisfied on the evidence that all the Defendants and Proposed Defendants have been served with notice of this hearing

## **IT IS ORDERED THAT:**

### **Definitions**

1. For the purpose of this Order:

- i. The ‘**Shipley Site**’ shall mean Teledyne UK Limited, Airedale House, Acorn Park, Shipley BD17 7SW, as marked in red on the plans at Annexe 1 to this Order;
- ii. The ‘**Lincoln Site**’ shall mean Teledyne UK Limited, 168 Sadler Road, Lincoln LN6 3RS, as marked in red on the plan at Annexe 2 to this Order;
- iii. ‘**Wirral Site**’ shall mean Teledyne UK Limited, Unit A, 6 Tebay Road, Bromborough, Birkenhead, Wirral CH62 3PA, as marked in red on the plan at Annexe 3 to this Order;

- iv. The ‘**Chelmsford Site**’ shall mean Teledyne UK Limited, 106 Waterhouse Lane, Chelmsford CM1 2QU, as marked in red on the plan at Annexe 4 to this Order;
- v. The ‘**Presteigne Site**’ shall mean Teledyne UK Limited, Broadaxe Business Park, Presteigne LD8 2UH, as marked in red on the plans at Annexe 5 to this Order;
- vi. The ‘**Newbury Site**’ shall mean Teledyne UK Limited, Reynolds Navigation House, Canal View Road, Newbury RG14 5UR, as marked on red on the plan at Annexe 6 to the Claim Form;
- vii. The road known as ‘**Acorn Park**’ means the road marked in purple on the plans at Annexe 1 to this Order.

## **INJUNCTION**

2. Until final disposal of the Claim or further order of the Court, the Defendants and each of them (whether by themselves or by instructing, encouraging, or allowing any other person) are forbidden from:
  - i. Entering or remaining on the following sites and/or entering or remaining in or on buildings on the following sites:
    - a) the Shipley Site, as marked in red on the plans at Annexe 1 to this Order;
    - b) the Lincoln Site, as marked in red on the plan at Annexe 2 to this Order;
    - c) the Wirral Site, as marked in red on the plan at Annexe 3 to this Order;
    - d) the Chelmsford Site, as marked in red on the plan at Annexe 4 to this Order;
    - e) the Presteigne Site, as marked in red on the plans at Annexe 5 to this Order; and
    - f) the Newbury Site, as marked in red on the plan at Annexe 6 to this Order.
  - ii. Depositing any item or substance on the following sites, affixing themselves or any other item to any building, structure or fixture on the following sites, and/or defacing or damaging any building, structure or fixture on the following sites:
    - a) the Shipley Site, as marked in red on the plans at Annexe 1 to this Order;
    - b) the Lincoln Site, as marked in red on the plan at Annexe 2 to this Order;
    - c) the Wirral Site, as marked in red on the plan at Annexe 3 to this Order;
    - d) the Chelmsford Site, as marked in red on the plan at Annexe 4 to this Order;

- e) the Presteigne Site, as marked in red on the plans at Annexe 5 to this Order; and
  - f) the Newbury Site, as marked in red on the plan at Annexe 6 to this Order.
- iii. Blocking, slowing down, obstructing or otherwise interfering with vehicular access to or from the highway at the Shipley Site (as marked in red on the plans at Annexe 1 to this Order);
  - iv. Approaching, slowing down or obstructing any vehicle moving along or accessing the road known as Acorn Park, Shipley (as marked in purple on the plans at Annexe 1 to this Order) for the purpose of:
    - a) disrupting vehicular access to or from the Shipley Site (as marked in red on the plans at Annexe 1 to this Order); and
    - b) protesting.
  - v. Affixing themselves or any other item to, or leaving or depositing any item on, the road known as Acorn Park, Shipley (as marked in purple on the plans at Annexe 1 to this Order) for the purpose of:
    - a) disrupting vehicular access to or from the Shipley Site (as marked in red in the plans at Annexe 1 to this Order); and
    - b) protesting.
  - vi. Affixing themselves or any other items to any vehicle on, entering or exiting the Shipley Site (as marked in red on the plans at Annexe 1 to this Order), where that affixation is done for the purpose of protesting.

### **Service and notification**

- 3. Pursuant to CPR rules 6.15 and 6.27, the Claimant has permission to serve the First to Seventh Defendants and the Twelfth to Eighteenth Defendants with, and permission to notify the Eighth to Eleventh Defendants (Persons Unknown) of, the Claim Form, Amended Claim Form, Application for interim relief, Application for the addition of further Named Defendants, evidence in support of the Claim and both Applications, this Order and any further documents in the Claim by (with 3(i) – 3(iv) to be treated conjunctively):
  - i. **Website:** placing a copy of the documents to be served on a website or webpage operated by the Claimant, a link to which shall be placed on the Claimant's main website; and
  - ii. **Email:** sending a copy of the documents to be served to Palestine Action, Bradford Friends of Palestine and the Palestine Solidarity Campaign (including the relevant local branches) at the following email addresses

[info@palestineaction.org](mailto:info@palestineaction.org);  
[media@palestinecampaign.org](mailto:media@palestinecampaign.org);

[actions@palestineaction.org](mailto:actions@palestineaction.org);  
[branches@palestinecampaign.org](mailto:branches@palestinecampaign.org);

[info@palestinecampaign.org](mailto:info@palestinecampaign.org);  
[pscchelmsford@gmail.com](mailto:pscchelmsford@gmail.com);  
[liverpoolfopal@gmail.com](mailto:liverpoolfopal@gmail.com);  
[bfdfriendsofpalestine@yahoo.com](mailto:bfdfriendsofpalestine@yahoo.com);

[palestinesolidaritybradford@gmail.com](mailto:palestinesolidaritybradford@gmail.com);  
[lincolnpalestine@gmail.com](mailto:lincolnpalestine@gmail.com);  
[pscshrop@gmail.com](mailto:pscshrop@gmail.com);

and providing a link by which the webpage or website mentioned in paragraph 3(i) above can be accessed.

- iii. **Post:** where an address of a Named Defendant is known to the Claimant, by posting a copy of the documents to be served together with a covering letter by way of first-class post;
  - iv. **Signs:** placing signs on the perimeter of the Shipley Site, Lincoln Site, Wirral Site, Chelmsford Site, Presteigne Site and Newbury Site, which advise that a High Court injunction is in force that restricts some protest activities, and which provide a weblink and QR code by which the website or webpage mentioned in paragraph 3(i) above can be accessed;
  - v. **Where requested by a Defendant:** the documents to be served may be served by email where the Defendant has requested that they be served by email, by sending the email to the address provided by the Defendant; or
  - vi. **Lawyers:** by serving any solicitor acting for a Defendant who has filed a notice of acting in these proceedings.
4. The deemed date of service of any documents referred to in paragraph 3 above shall be the day on which service of the document or documents is completed in accordance with paragraph 3 above.
  5. The Twelfth to Eighteenth Defendants shall acknowledge service of the Claim Form 56 days after the deemed date of service and file any written evidence in defence by the same date. For the avoidance of doubt, the date by which the First to Seventh Defendants shall acknowledge service and file and serve any written evidence in defence is 13 March 2025 (in accordance with the Order of Bourne J dated 20 December 2024).

### **Permission to apply**

6. The Defendants or any other person affected by this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person, but they must first give the Claimant's solicitors 72 hours' notice of such application. If any evidence is to be relied upon in support of that application, that evidence must be served on the Claimant's solicitors 48 hours in advance of the hearing.
7. Any person applying to vary or discharge this Order must provide their full name and address for service.

### **Directions**

8. The Claimant is permitted to amend the Claim Form in the manner of the red lined draft annexed to the Application dated 15 January 2025, and specifically to:

- i. add the Twelfth to Eighteenth Defendants as Defendants to the Claim those being Cheryl Leanaghan, Mais Robinson, Autumn Taylor-Ward, Anabella Barringer, Lara Downes, Gabrielle Middleton and Luke Carter respectively;
  - ii. amend paragraph 7 of the Brief Details of Claim to include relevant information on the Twelfth to Eighteenth Defendants;
  - iii. include the addresses of the First to Seventh and Twelfth to Eighteenth Defendants.
9. The Claimant shall file and serve (in accordance with paragraph 3 above) any further evidence upon which it will seek to rely at the disposal of the Claim and review of the Order against Persons Unknown by 4pm on 29 May 2025.
10. The Defendants shall file and serve any evidence upon which they will seek to rely at the disposal of the Claim by 4pm on 26 June 2025.
11. The Claimant may (if so advised) file and serve (in accordance with paragraph 3 above) any evidence in reply by 4pm on 10 July 2025.
12. A final hearing shall be listed for **Friday 25 July 2025 at 10.30am** in the Royal Courts of Justice, Strand, London, WC2A 2LL, with a time estimate of one day, at which the Order against Persons Unknown shall also be reviewed. A further ½ day should be allocated for judicial pre-reading. In the event that the time estimate requires revision (whether upwards or downwards), the Claimant shall inform the Court as soon as it is reasonably practicable to do so.
13. The Claimant shall file and serve (in accordance with paragraph 3 above) a hearing bundle by 4pm on 18 July 2025, save that the Claimant need only serve Named Defendants in accordance with paragraph 3(iii) above where that Defendant has acknowledged service of the Claim and/or filed evidence in defence of the Claim or indicated that they intend to participate in the final hearing of the Claim.
14. Skeleton arguments shall be filed and served (in accordance with paragraph 3 above) by 4pm on 22 July 2025, save that the Claimant need only serve Named Defendants in accordance with paragraph 3(iii) above where that Defendant has acknowledged service of the Claim and/or filed evidence in defence of the Claim or indicated that they intend to participate in the final hearing of the Claim.
15. Solicitors for the Claimant shall liaise with the KB Judges Listing Office as to the audio-visual technology required at the final hearing (if any).

#### **Communications with the Claimant and the Court**

16. All communications with the Claimant about this Order should be sent by email to the Claimant's solicitors, Keystone Law, at [info.teledyne@keystonelaw.co.uk](mailto:info.teledyne@keystonelaw.co.uk).
17. All communications with the Court about this Order should be sent to [KBJudgesListing@justice.gov.uk](mailto:KBJudgesListing@justice.gov.uk) or Room E03 Royal Courts of Justice, Strand, London

WC2A 2LL. The Telephone number is 020 3938957. The offices are open between 10am and 4pm Monday to Friday.

**Costs**

18. Costs in the case.

## **GUIDANCE NOTES**

### **Effect of this Order – the Defendants**

1. A Defendant who is an individual and who is ordered not to do something must not do it him or herself or in any other way nor must he/she do it through others acting on his/her behalf or on his/her instructions or with his/her encouragement.

### **Interpretation of this Order**

2. In this Order, references to ‘the Defendant’ means any or all of them (unless expressly stated otherwise).
3. A requirement to serve on a ‘Defendant’ means on each of them. However, the Order is effective against any Defendant on whom it is served in accordance with this Order.
4. An Order requiring ‘the Defendant’ not to do anything applies to all Defendants.
5. This Order contains the following schedules and annexes
  - i. Schedule 1 – Named Defendants;
  - ii. Schedule 2 – witness statements;
  - iii. Schedule 3 – undertakings;
  - iv. Annexe 1 – plans of the Shipley Site;
  - v. Annexe 2 – plan of the Lincoln Site;
  - vi. Annexe 3 – plan of the Wirral Site;
  - vii. Annexe 4 – plan of the Chelmsford Site;
  - viii. Annexe 5 – plans of the Presteigne Site;
  - ix. Annexe 6 – plan of the Newbury Site.

### **SCHEDULE 1 – NAMED DEFENDANTS**

- (1) JULIAN ALLEN GAO
- (2) RUBY HAMILL
- (3) DANIEL JONES
- (4) NAJAM SHAH
- (5) RICKY SOUTHALL
- (6) AMAREEN AFZAL
- (7) SERENA FENTON
- (12) CHERYL LEANAGHAN
- (13) MAIS ROBINSON
- (14) AUTUMN TAYLOR-WARD
- (15) ANABELLA BARRINGER
- (16) LARA DOWNES
- (17) GABRIELLE MIDDLETON
- (18) LUKE CARTER

### **SCHEDULE 2 – WITNESS STATEMENTS**

The Court read the following witness statements on behalf of the Claimants:

- 1. The first witness statement of Nicholas James Wargent dated 13 December 2024;
- 2. The first witness statement of Manan Singh dated 13 December 2024;
- 3. The second witness statement of Nicholas James Wargent dated 19 December 2024;
- 4. The third witness statement of Nicholas James Wargent dated 15 January 2025;
- 5. The third witness statement of Manan Singh dated 23 January 2025.

### **SCHEDULE 3 – UNDERTAKINGS**

1. If the Court later finds that this Order has caused loss to the Defendants, and decides that the Defendants should be compensated for that loss, the Claimant gives an undertaking in damages limited to £100,000.

## ANNEXE 1 – SHIPLEY SITE



**Promap**

LANDMARK INFORMATION

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Plotted Scale - 1:4000. Paper Size - A4

Title Number: WYK387275

Acorn Park



**Promap**

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Plotted Scale - 1:1250, Paper Size - A4

Title Number: WYK387275

## ANNEXE 2 – LINCOLN SITE



**Promap**  
LANDMARK INFORMATION

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Plotted Scale - 1:1250. Paper Size - A4

Title Number: LL317736

### ANNEXE 3 – WIRRAL SITE



**Promap**

LANDMARK INFORMATION

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Plotted Scale - 1:1250. Paper Size - A4

Title Number: MS575234

## ANNEXE 4 – CHELMSFORD SITE



**Promap**

LANDMAPS INTERNATIONAL

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Plotted Scale - 1:4000. Paper Size - A4

Title Number: EX688035

## ANNEXE 5 – PRESTEIGNE SITE



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Plotted Scale - 1:1000. Paper Size - A4

Title Number: CYM839162



**Promap**  
LANDMAP INFORMATION

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Plotted Scale - 1:750. Paper Size - A4

Title Number: WA552132

## ANNEXE 6 – NEWBURY SITE



**Promap**

Landmark Information Systems

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Plotted Scale - 1:750. Paper Size - A4

Title Number: BK365055

**PENAL NOTICE**

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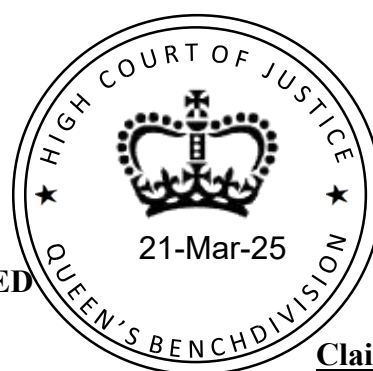
**IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION**

**Claim No. KB-2024-004175**

**Before the Honourable Mr Justice Murray  
21 March 2025**

**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 THIS ORDER AND ALSO 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:**

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**B. THE 'LINCOLN SITE' (TELEDYNE UK LIMITED, 168 SADLER ROAD, LINCOLN LN6 3RS);**

**C. THE 'WIRRAL SITE' (TELEDYNE UK LIMITED, UNIT A, 6 TEBAY ROAD, BROMBOROUGH, BIRKENHEAD, WIRRAL CH62 3PA);**

**D. THE 'CHELMSFORD SITE' (TELEDYNE UK LIMITED, 106 WATERHOUSE LANE, CHELMSFORD CM1 2QU);**

**E. THE ‘PRESTEIGNE SITE’ (TELEDYNE UK LIMITED, BROADAXE BUSINESS PARK, PRESTEIGNE LD8 2UH); AND**

**F. THE ‘NEWBURY SITE’ (TELEDYNE UK LIMITED, REYNOLDS NAVIGATION HOUSE, CANAL VIEW ROAD, NEWBURY RG14 5UR).**

**(9) PERSONS UNKNOWN WHO FOR THE PURPOSE OF PROTESTING ARE OBSTRUCTING ANY VEHICLE ACCESSING THE ‘SHIPLEY SITE’ (TELEDYNE UK LIMITED, AIREDALE HOUSE, ACORN PARK, SHIPLEY BD17 7SW) FROM THE HIGHWAY**

**(10) PERSONS UNKNOWN WHO FOR THE PURPOSE OF PROTESTING ARE OBSTRUCTING ANY VEHICLE ACCESSING THE HIGHWAY FROM THE ‘SHIPLEY SITE’ (TELEDYNE UK LIMITED, AIREDALE HOUSE, ACORN PARK, SHIPLEY BD17 7SW)**

**(11) PERSONS UNKNOWN WHO FOR THE PURPOSE OF PROTESTING ARE CAUSING THE BLOCKING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT SCHEDULE 3 TO THE CLAIM FORM**

**(12) – (18) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THIS ORDER AND ALSO AT SCHEDULE 1 TO THE CLAIM FORM**

**(19) MARY ENSELL**

**(20) HARRY WADE**

**Defendants**

---

**INJUNCTION ORDER**

---

**UPON** the Claimant’s claim brought by way of a Part 8 Claim Form dated 13 December 2024 (the ‘Claim’)

**AND UPON** the Claimant making an application for interim injunctive relief by way of an Application Notice dated 13 December 2024, which relief was granted on 20 December 2024 and continued on 24 January 2025

**AND UPON** the Claimant making an application by way of an Application Notice dated 13 February 2025 to add Mary Ensell and Harry Wade as the Nineteenth and Twentieth Defendants (respectively) to the Claim and the interim injunctive relief (the ‘Application’)

**AND UPON** the Court reading the witness statements listed in Schedule 2 to this Order

**AND UPON** the Court having particular regard to the importance of the Defendants' Article 10 and Article 11 Convention rights to freedom of expression and freedom of lawful assembly

**AND UPON** the Court being satisfied that the Order does not prohibit peaceful protest

**AND UPON** the Court considering its discretion to grant injunctive relief pursuant to s37(1) of the Senior Courts Act 1981 and considering it just and convenient to do so

**AND UPON** the Court accepting the undertakings given in Schedule 3 to this Order

**AND UPON** the Court considering, in all the circumstances of this case, that it is appropriate to determine the Application without a hearing (with liberty to apply)

## **IT IS ORDERED THAT:**

### **Definitions**

1. For the purpose of this Order:

- i. The **'Shipley Site'** shall mean Teledyne UK Limited, Airedale House, Acorn Park, Shipley BD17 7SW, as marked in red on the plans at Annexe 1 to this Order;
- ii. The **'Lincoln Site'** shall mean Teledyne UK Limited, 168 Sadler Road, Lincoln LN6 3RS, as marked in red on the plan at Annexe 2 to this Order;
- iii. **'Wirral Site'** shall mean Teledyne UK Limited, Unit A, 6 Tebay Road, Bromborough, Birkenhead, Wirral CH62 3PA, as marked in red on the plan at Annexe 3 to this Order;
- iv. The **'Chelmsford Site'** shall mean Teledyne UK Limited, 106 Waterhouse Lane, Chelmsford CM1 2QU, as marked in red on the plan at Annexe 4 to this Order;
- v. The **'Presteigne Site'** shall mean Teledyne UK Limited, Broadaxe Business Park, Presteigne LD8 2UH, as marked in red on the plans at Annexe 5 to this Order;
- vi. The **'Newbury Site'** shall mean Teledyne UK Limited, Reynolds Navigation House, Canal View Road, Newbury RG14 5UR, as marked in red on the plan at Annexe 6 to this Order;
- vii. The road known as **'Acorn Park'** means the road marked in purple on the plans at Annexe 1 to this Order.

## **INJUNCTION**

2. Until final disposal of the Claim or further order of the Court, the **Nineteenth and Twentieth Defendants** and each of them (whether by themselves or by instructing, encouraging, or allowing any other person) are forbidden from:

- i. Entering or remaining on the following sites and/or entering or remaining in or on buildings on the following sites:
  - a) the Shipley Site, as marked in red on the plans at Annexe 1 to this Order;
  - b) the Lincoln Site, as marked in red on the plan at Annexe 2 to this Order;
  - c) the Wirral Site, as marked in red on the plan at Annexe 3 to this Order;
  - d) the Chelmsford Site, as marked in red on the plan at Annexe 4 to this Order;
  - e) the Presteigne Site, as marked in red on the plans at Annexe 5 to this Order; and
  - f) the Newbury Site, as marked in red on the plan at Annexe 6 to this Order.
- ii. Depositing any item or substance on the following sites, affixing themselves or any other item to any building, structure or fixture on the following sites, and/or defacing or damaging any building, structure or fixture on the following sites:
  - a) the Shipley Site, as marked in red on the plans at Annexe 1 to this Order;
  - b) the Lincoln Site, as marked in red on the plan at Annexe 2 to this Order;
  - c) the Wirral Site, as marked in red on the plan at Annexe 3 to this Order;
  - d) the Chelmsford Site, as marked in red on the plan at Annexe 4 to this Order;
  - e) the Presteigne Site, as marked in red on the plans at Annexe 5 to this Order; and
  - f) the Newbury Site, as marked in red on the plan at Annexe 6 to this Order.
- iii. Blocking, slowing down, obstructing or otherwise interfering with vehicular access to or from the highway at the Shipley Site (as marked in red on the plans at Annexe 1 to this Order);
- iv. Approaching, slowing down or obstructing any vehicle moving along or accessing the road known as Acorn Park, Shipley (as marked in purple on the plans at Annexe 1 to this Order) for the purpose of:
  - a) disrupting vehicular access to or from the Shipley Site (as marked in red on the plans at Annexe 1 to this Order); and
  - b) protesting.

- v. Affixing themselves or any other item to, or leaving or depositing any item on, the road known as Acorn Park, Shipley (as marked in purple on the plans at Annexe 1 to this Order) for the purpose of:
  - a) disrupting vehicular access to or from the Shipley Site (as marked in red in the plans at Annexe 1 to this Order); and
  - b) protesting.
- vi. Affixing themselves or any other items to any vehicle on, entering or exiting the Shipley Site (as marked in red on the plans at Annexe 1 to this Order), where that affixation is done for the purpose of protesting.

### **Service and notification**

3. Pursuant to CPR rules 6.15 and 6.27, the Claimant has permission to serve the **Nineteenth and Twentieth Defendants** with the Re-Amended Claim Form, Application for interim relief, Application to add the Twelfth to Eighteenth Named Defendants, Application to add the Nineteenth and Twentieth Defendants, all evidence in support of the Claim and all Applications, this Order and any further documents in the Claim by (with 3(i) – 3(iv) to be treated conjunctively):

- i. **Website:** placing a copy of the documents to be served on a website or webpage operated by the Claimant, a link to which shall be placed on the Claimant's main website; and
- ii. **Email:** sending a copy of the documents to be served to Palestine Action, Bradford Friends of Palestine and the Palestine Solidarity Campaign (including the relevant local branches) at the following email addresses

<a href="mailto:info@palestineaction.org">info@palestineaction.org</a> ;	<a href="mailto:actions@palestineaction.org">actions@palestineaction.org</a> ;
<a href="mailto:media@palestinecampaign.org">media@palestinecampaign.org</a> ;	<a href="mailto:branches@palestinecampaign.org">branches@palestinecampaign.org</a> ;
<a href="mailto:info@palestinecampaign.org">info@palestinecampaign.org</a> ;	<a href="mailto:palestinesolidaritybradford@gmail.com">palestinesolidaritybradford@gmail.com</a> ;
<a href="mailto:pscchelmsford@gmail.com">pscchelmsford@gmail.com</a> ;	<a href="mailto:lincolnpalestine@gmail.com">lincolnpalestine@gmail.com</a> ;
<a href="mailto:liverpoolfopal@gmail.com">liverpoolfopal@gmail.com</a> ;	<a href="mailto:pscshrop@gmail.com">pscshrop@gmail.com</a> ;
<a href="mailto:bfdfriendsofpalestine@yahoo.com">bfdfriendsofpalestine@yahoo.com</a> ;	

and providing a link by which the webpage or website mentioned in paragraph 3(i) above can be accessed.

- iii. **Post:** where an address of a Named Defendant is known to the Claimant, by posting a copy of the documents to be served together with a covering letter by way of first-class post;
- iv. **Signs:** placing signs on the perimeter of the Shipley Site, Lincoln Site, Wirral Site, Chelmsford Site, Presteigne Site and Newbury Site, which advise that a High Court injunction is in force that restricts some protest activities, and which provide a weblink and QR code by which the website or webpage mentioned in paragraph 3(i) above can be accessed;

- v. **Where requested by a Defendant:** the documents to be served may be served by email where the Defendant has requested that they be served by email, by sending the email to the address provided by the Defendant; or
  - vi. **Lawyers:** by serving any solicitor acting for a Defendant who has filed a notice of acting in these proceedings.
4. The deemed date of service of any documents referred to in paragraph 3 above shall be the day on which service of the document or documents is completed in accordance with paragraph 3 above.
  5. The **Nineteenth and Twentieth Defendants** shall acknowledge service of the Claim Form 56 days after the deemed date of service and file any written evidence in defence by the same date.

### **Liberty to apply**

6. The Defendants or any other person affected by this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person, but they must first give the Claimant's solicitors 72 hours' notice of such application. If any evidence is to be relied upon in support of that application, that evidence must be served on the Claimant's solicitors 48 hours in advance of the hearing.
7. Any person applying to vary or discharge this Order must provide their full name and address for service.

### **Directions**

8. The Claimant is permitted to amend the Amended Claim Form in the manner of the green lined draft annexed to the Application dated 13 February 2025, and specifically to:
  - i. add the Nineteenth and Twentieth Defendants as Defendants to the Claim those being Mary Ensell and Harry Wade respectively;
  - ii. amend paragraph 7 of the Brief Details of Claim to include relevant information on the Nineteenth and Twentieth Defendants;
  - iii. include the addresses of the Nineteenth and Twentieth Defendants.
9. The Claimant shall file and serve (in accordance with paragraph 3 above) any further evidence upon which it will seek to rely at the disposal of the Claim and review of the Order against Persons Unknown by 4pm on 29 May 2025.
10. The Defendants shall file and serve any evidence upon which they will seek to rely at the disposal of the Claim by 4pm on 26 June 2025.
11. The Claimant may (if so advised) file and serve (in accordance with paragraph 3 above) any evidence in reply by 4pm on 10 July 2025.

12. A final hearing shall be listed for **Friday 25 July 2025 at 10.30am** in the Royal Courts of Justice, Strand, London WC2A 2LL, with a time estimate of one day, at which the Order against Persons Unknown shall also be reviewed. A further ½ day should be allocated for judicial pre-reading. In the event that the time estimate requires revision (whether upwards or downwards), the Claimant shall inform the Court as soon as it is reasonably practicable to do so.
13. The Claimant shall file and serve (in accordance with paragraph 3 above) a hearing bundle by 4pm on 18 July 2025, save that the Claimant need only serve Named Defendants in accordance with paragraph 3(iii) above where that Defendant has acknowledged service of the Claim and/or filed evidence in defence of the Claim or indicated that they intend to participate in the final hearing of the Claim.
14. Skeleton arguments shall be filed and served (in accordance with paragraph 3 above) by 4pm on 22 July 2025, save that the Claimant need only serve Named Defendants in accordance with paragraph 3(iii) above where that Defendant has acknowledged service of the Claim and/or filed evidence in defence of the Claim or indicated that they intend to participate in the final hearing of the Claim.
15. Solicitors for the Claimant shall liaise with the KB Judges Listing Office as to the audio-visual technology required at the final hearing (if any).

#### **Communications with the Claimant and the Court**

16. All communications with the Claimant about this Order should be sent by email to the Claimant's solicitors, Keystone Law, at [info.teledyne@keystonelaw.co.uk](mailto:info.teledyne@keystonelaw.co.uk).
17. All communications with the Court about this Order should be sent to [KBJudgesListing@justice.gov.uk](mailto:KBJudgesListing@justice.gov.uk) or Room E03 Royal Courts of Justice, Strand, London WC2A 2LL. The Telephone number is 020 3938957. The offices are open between 10am and 4pm Monday to Friday.

#### **Costs**

18. Costs in the case.

## **GUIDANCE NOTES**

### **Effect of this Order – the Defendants**

1. A Defendant who is an individual and who is ordered not to do something must not do it him or herself or in any other way nor must he/she do it through others acting on his/her behalf or on his/her instructions or with his/her encouragement.

### **Interpretation of this Order**

2. In this Order, references to ‘the Defendant’ means any or all of them (unless expressly stated otherwise).
3. A requirement to serve on a ‘Defendant’ means on each of them. However, the Order is effective against any Defendant on whom it is served in accordance with this Order.
4. An Order requiring ‘the Defendant’ not to do anything applies to all Defendants.
5. This Order contains the following schedules and annexes
  - i. Schedule 1 – Named Defendants;
  - ii. Schedule 2 – witness statements;
  - iii. Schedule 3 – undertakings;
  - iv. Annexe 1 – plans of the Shipley Site;
  - v. Annexe 2 – plan of the Lincoln Site;
  - vi. Annexe 3 – plan of the Wirral Site;
  - vii. Annexe 4 – plan of the Chelmsford Site;
  - viii. Annexe 5 – plans of the Presteigne Site;
  - ix. Annexe 6 – plan of the Newbury Site.

### **SCHEDULE 1 – NAMED DEFENDANTS**

- (1) JULIAN ALLEN GAO
- (2) RUBY HAMILL
- (3) DANIEL JONES
- (4) NAJAM SHAH
- (5) RICKY SOUTHALL
- (6) AMAREEN AFZAL
- (7) SERENA FENTON
- (12) CHERYL LEANAGHAN
- (13) MAIS ROBINSON
- (14) AUTUMN TAYLOR-WARD
- (15) ANABELLA BARRINGER
- (16) LARA DOWNES
- (17) GABRIELLE MIDDLETON
- (18) LUKE CARTER
- (19) MARY ENSELL
- (20) HARRY WADE

### **SCHEDULE 2 – WITNESS STATEMENTS**

The Court read the following witness statements on behalf of the Claimants:

- 1. The first witness statement of Nicholas James Wargent dated 13 December 2024;
- 2. The first witness statement of Manan Singh dated 13 December 2024;
- 3. The second witness statement of Nicholas James Wargent dated 19 December 2024;
- 4. The third witness statement of Nicholas James Wargent dated 15 January 2025;
- 5. The third witness statement of Manan Singh dated 23 January 2025;
- 6. The fourth witness statement of Manan Singh dated 13 February 2025.

### **SCHEDULE 3 – UNDERTAKINGS**

1. If the Court later finds that this Order has caused loss to the Defendants, and decides that the Defendants should be compensated for that loss, the Claimant gives an undertaking in damages limited to £100,000.

## ANNEXE 1 – SHIPLEY SITE



Acorn Park



**Promap**

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Plotted Scale - 1:1250, Paper Size - A4

Title Number: WYK387275

## ANNEXE 2 – LINCOLN SITE



**Promap**  
LANDMARK INFORMATION

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Plotted Scale - 1:1250. Paper Size - A4

Title Number: LL317736

### ANNEXE 3 – WIRRAL SITE



**Promap**

LANDMAPS INTERNATIONAL

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Plotted Scale - 1:1250. Paper Size - A4

Title Number: MS575234

## ANNEXE 4 – CHELMSFORD SITE



**Promap**  
LANDMAPS INTERNATIONAL

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Plotted Scale - 1:4000. Paper Size - A4

Title Number: EX688035

## ANNEXE 5 – PRESTEIGNE SITE



**Promap**  
Aerial imagery and mapping

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Plotted Scale - 1:1000. Paper Size - A4

Title Number: CYM839162



**Promap**

LANDSCAPE INFORMATION

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Plotted Scale - 1:750. Paper Size - A4

Title Number: WA552132

## ANNEXE 6 – NEWBURY SITE



**Promap**

Landmark Information Systems

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Plotted Scale - 1:750. Paper Size - A4

Title Number: BK365055

**In the matter of an injunction sought pursuant to CPR 25**

Before the Honourable Mr Justice Bourne  
20 December 2024

**B E T W E E N :**

**TELEDYNE UK LIMITED**

**-and-**

**(1) JULIAN ALLEN GAO**

**(2) RUBY HAMILL**

**(3) DANIEL JONES**

**(4) NAJAM SHAH**

**(5) RICKY SOUTHALL**

**(6) AMAREEN AFZAL**

**(7) SERENA FENTON**

**(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**



**KB-2024-004175**

**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**

**Defendants**

---

**INJUNCTION ORDER**

---

**PENAL NOTICE**

**IF YOU, THE ABOVE NAMED DEFENDANTS OR PERSONS UNKNOWN OR ANY OF YOU DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.**

**ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED**

**UPON** the Claimant’s claim brought by way of a Part 8 Claim Form dated 13 December 2024 (the ‘Claim’)

**AND UPON** the Claimant making an application for interim injunctive relief by way of an Application Notice dated 13 December 2024 (the ‘Application’)

**AND UPON** the Court reading the Application and the witness statements listed in Schedule 2 to this Order

**AND UPON** the Court being satisfied pursuant to s12(2)(b) of the Human Rights Act 1998 that the Claimants had compelling reasons why the Named Defendants should not be notified of the Application prior to the Court hearing the Application (but with short notice of this hearing having in any event been given to the Defendants by way of email to the email address listed at paragraph 3(ii) of this Order)

**AND UPON** the Court having particular regard to the importance of the Defendants' Article 10 and Article 11 Convention rights to freedom of expression and freedom of lawful assembly

**AND UPON** the Court being satisfied that the Order does not prohibit peaceful protest

**AND UPON** the Court considering its discretion to grant injunctive relief pursuant to s37(1) of the Senior Courts Act 1981 and considering it just and convenient to do so

**AND UPON** the Court accepting the undertakings given in Schedule 3 to this Order

**AND UPON** hearing Natalie Pratt of counsel for the Claimant, without attendance by the Defendants

## **IT IS ORDERED THAT:**

### **Definitions**

1. For the purpose of this Order:

- i. The **'Shipley Site'** shall mean Teledyne UK Limited, Airedale House, Acorn Park, Shipley BD17 7SW, as marked in red on the plans at Annexe 1 to this Order;
- ii. The **'Lincoln Site'** shall mean Teledyne UK Limited, 168 Sadler Road, Lincoln LN6 3RS, as marked in red on the plan at Annexe 2 to this Order;
- iii. **'Wirral Site'** shall mean Teledyne UK Limited, Unit A, 6 Tebay Road, Bromborough, Birkenhead, Wirral CH62 3PA, as marked in red on the plan at Annexe 3 to this Order;
- iv. The **'Chelmsford Site'** shall mean Teledyne UK Limited, 106 Waterhouse Lane, Chelmsford CM1 2QU, as marked in red on the plan at Annexe 4 to this Order;
- v. The **'Presteigne Site'** shall mean Teledyne UK Limited, Broadaxe Business Park, Presteigne LD8 2UH, as marked in red on the plans at Annexe 5 to this Order;
- vi. The **'Newbury Site'** shall mean Teledyne UK Limited, Reynolds Navigation House, Canal View Road, Newbury RG14 5UR, as marked on red on the plan at Annexe 6 to the Claim Form.

### **INJUNCTION**

2. Until and subject to any further order of the Court, the Defendants and each of them (whether by themselves or by instructing, encouraging, or allowing any other person) are forbidden from:

- i. Entering or remaining on the following sites and/or entering or remaining in or on buildings on the following sites:
  - a) the Shipley Site, as marked in red on the plans at Annexe 1 to this Order;
  - b) the Lincoln Site, as marked in red on the plan at Annexe 2 to this Order;
  - c) the Wirral Site, as marked in red on the plan at Annexe 3 to this Order;
  - d) the Chelmsford Site, as marked in red on the plan at Annexe 4 to this Order;
  - e) the Presteigne Site, as marked in red on the plans at Annexe 5 to this Order; and
  - f) the Newbury Site, as marked in red on the plan at Annexe 6 to this Order.
- ii. Depositing any item or substance on the following sites, affixing themselves or any other item to any building, structure or fixture on the following sites, and/or defacing or damaging any building, structure or fixture on the following sites:
  - a) the Shipley Site, as marked in red on the plans at Annexe 1 to this Order;
  - b) the Lincoln Site, as marked in red on the plan at Annexe 2 to this Order;
  - c) the Wirral Site, as marked in red on the plan at Annexe 3 to this Order;
  - d) the Chelmsford Site, as marked in red on the plan at Annexe 4 to this Order;
  - e) the Presteigne Site, as marked in red on the plans at Annexe 5 to this Order; and
  - f) the Newbury Site, as marked in red on the plan at Annexe 6 to this Order.
- iii. Blocking, slowing down, obstructing or otherwise interfering with vehicular access to or from the highway at the Shipley Site (as marked in red on the plans at Annexe 1 to this Order);
- iv. Approaching, slowing down or obstructing any vehicle moving along or accessing the road known as Acorn Park, Shipley (as marked in purple on the plans at Annexe 1 to this Order) for the purpose of:
  - a) disrupting vehicular access to or from the Shipley Site (as marked in red on the plans at Annexe 1 to this Order); and
  - b) protesting.

- v. Affixing themselves or any other item to, or leaving or depositing any item on, the road known as Acorn Park, Shipley (as marked in purple on the plans at Annexe 1 to this Order) for the purpose of:
  - a) disrupting vehicular access to or from the Shipley Site (as marked in red in the plans at Annexe 1 to this Order); and
  - b) protesting.
- vi. Affixing themselves or any other items to any vehicle on, entering or exiting the Shipley Site (as marked in red on the plans at Annexe 1 to this Order), where that affixation is done for the purpose of protesting.

### Service and notification

3. Pursuant to CPR rules 6.15 and 6.27, the Claimant has permission to serve the First to Seventh Defendants with, and permission to notify the Eighth to Eleventh Defendants (Persons Unknown) of, the Claim Form, Application for interim relief, evidence in support of the Claim and Application, this Order and any further documents in the Claim by (with 3(i) – 3(iv) to be treated conjunctively):

- i. **Website:** placing a copy of the documents to be served on a website or webpage operated by the Claimant, a link to which shall be placed on the Claimant's main website; and
- ii. **Email:** sending a copy of the documents to be served to Palestine Action, Bradford Friends of Palestine and the Palestine Solidarity Campaign (including the relevant local branches) at the following email addresses

<a href="mailto:info@palestineaction.org">info@palestineaction.org</a> ;	<a href="mailto:actions@palestineaction.org">actions@palestineaction.org</a> ;
<a href="mailto:media@palestinecampaign.org">media@palestinecampaign.org</a> ;	<a href="mailto:branches@palestinecampaign.org">branches@palestinecampaign.org</a> ;
<a href="mailto:info@palestinecampaign.org">info@palestinecampaign.org</a> ;	<a href="mailto:palestinesolidaritybradford@gmail.com">palestinesolidaritybradford@gmail.com</a> ;
<a href="mailto:pscchelmsford@gmail.com">pscchelmsford@gmail.com</a> ;	<a href="mailto:lincolnpalestine@gmail.com">lincolnpalestine@gmail.com</a> ;
<a href="mailto:liverpoolfopal@gmail.com">liverpoolfopal@gmail.com</a> ;	<a href="mailto:pscshrop@gmail.com">pscshrop@gmail.com</a> ;
<a href="mailto:bfdfriendsofpalestine@yahoo.com">bfdfriendsofpalestine@yahoo.com</a> ;	

and providing a link by which the webpage or website mentioned in paragraph 3(i) above can be accessed.

- iii. **Post:** where an address of a Named Defendant is known to the Claimant, by posting a copy of the documents to be served together with a covering letter by way of first-class post;
- iv. **Signs:** placing signs on the perimeter of the Shipley Site, Lincoln Site, Wirral Site, Chelmsford Site, Presteigne Site and Newbury Site, which advise that a High Court injunction is in force that restricts some protest activities, and which provide a weblink and QR code by which the website or webpage mentioned in paragraph 3(i) above can be accessed;

- v. **Where requested by a Defendant:** the documents to be served may be served by email where the Defendant has requested that they be served by email, by sending the email to the address provided by the Defendant; or
  - vi. **Lawyers:** by serving any solicitor acting for a Defendant who has filed a notice of acting in these proceedings.
- 4. The deemed date of service of any documents referred to in paragraph 3 above shall be the day on which service of the document or documents is completed in accordance with paragraph 3 above.
  - 5. The Defendants shall acknowledge service of the Claim Form 56 days after the deemed date of service and file any written evidence in defence by the same date.

### **Liberty to apply**

- 6. The Defendants or any other person affected by this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person, but they must first give the Claimant's solicitors 72 hours' notice of such application. If any evidence is to be relied upon in support of that application, that evidence must be served on the Claimant's solicitors 48 hours in advance of the hearing.
- 7. Any person applying to vary or discharge this Order must provide their full name and address for service.

### **Return date hearing**

- 8. The continuation of this Order shall be considered at a hearing before a Judge of the King's Bench Division on 24 January 2025, with a time estimate of 1 day, to include 1.5 hours judicial pre-reading.
- 9. Any evidence in support of or opposition to the continuation of this Order shall be filed by 4pm on 17 January 2025.
- 10. The Claimant shall file, and serve in accordance with paragraph 3 above, a hearing bundle for use at the return date hearing by 4pm on 20 January 2025.
- 11. The Claimant shall file, and serve in accordance with paragraph 3 above, its skeleton argument by 4pm on 21 January 2025. Any other person who wishes to be heard at the return date hearing should also file and serve on the Claimant a skeleton argument by 4pm on 21 January 2025.

### **Communications with the Claimant and the Court**

- 12. All communications with the Claimant about this Order should be sent by email to the Claimant's solicitors, Keystone Law, at [info.teledyne@keystonelaw.co.uk](mailto:info.teledyne@keystonelaw.co.uk).
- 13. All communications with the Court about this Order should be sent to [KBJudgesListing@justice.gov.uk](mailto:KBJudgesListing@justice.gov.uk) or Room E03 Royal Courts of Justice, Strand, London

WC2A 2LL. The Telephone number is 020 3938957. The offices are open between 10am and 4pm Monday to Friday.

### **Costs**

14. Costs reserved

Pursuant to CPR 40.7(1) this Order has effect from the date it is made, that being **20 December 2024**.

## **GUIDANCE NOTES**

### **Effect of this Order – the Defendants**

1. A Defendant who is an individual and who is ordered not to do something must not do it him or herself or in any other way nor must he/she do it through others acting on his/her behalf or on his/her instructions or with his/her encouragement.

### **Interpretation of this Order**

2. In this Order, references to ‘the Defendant’ means any or all of them (unless expressly stated otherwise).
3. A requirement to serve on a ‘Defendant’ means on each of them. However, the Order is effective against any Defendant on whom it is served in accordance with this Order.
4. An Order requiring ‘the Defendant’ not to do anything applies to all Defendants.
5. This Order contains the following schedules and annexes
  - i. Schedule 1 – Named Defendants;
  - ii. Schedule 2 – witness statements;
  - iii. Schedule 3 – undertakings;
  - iv. Annexe 1 – plans of the Shipley Site;
  - v. Annexe 2 – plan of the Lincoln Site;
  - vi. Annexe 3 – plan of the Wirral Site;
  - vii. Annexe 4 – plan of the Chelmsford Site;
  - viii. Annexe 5 – plans of the Presteigne Site;
  - ix. Annexe 6 – plan of the Newbury Site.

### **SCHEDULE 1 – NAMED DEFENDANTS**

- (1) JULIAN ALLEN GAO
- (2) RUBY HAMILL
- (3) DANIEL JONES
- (4) NAJAM SHAH
- (5) RICKY SOUTHALL
- (6) AMAREEN AFZAL
- (7) SERENA FENTON

### **SCHEDULE 2 – WITNESS STATEMENTS**

The Court read the following witness statements on behalf of the Claimants:

- 1. The first witness statement of Nicholas James Wargent dated 13 December 2024;
- 2. The first witness statement of Manan Singh dated 13 December 2024;
- 3. The second witness statement of Nicholas James Wargent dated 19 December 2024.

### **SCHEDULE 3 – UNDERTAKINGS**

- 1. If the Court later finds that this Order has caused loss to the Defendants, and decides that the Defendants should be compensated for that loss, the Claimant gives an undertaking in damages limited to £50,000.

## ANNEXE 1 – SHIPLEY SITE



**Promap**  
LANDMARK INFORMATION

© Crown Copyright and database rights 2024, OS AC0000813445  
Plotted Scale - 1:4000, Paper Size - A4

Title Number: WYK387275



**Promap**  
Real Estate Information

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Plotted Scale - 1:1250. Paper Size - A4

Title Number: WYK367275

## ANNEXE 2 – LINCOLN SITE



**Promap**  
LANDSCAPE ARCHITECTS

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Plotted Scale - 1:1250. Paper Size - A4

Title Number: LL317736

## ANNEXE 3 – WIRRAL SITE



**Promap**  
LANDSCAPE ARCHITECTS

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Plotted Scale - 1:1250. Paper Size - A4

Title Number: MS575234

## ANNEXE 4 – CHELMSFORD SITE



**Promap**  
LANDSCAPE ARCHITECTS

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Plotted Scale - 1:4000. Paper Size - A4

Title Number: EX688035

## ANNEXE 5 – PRESTEIGNE SITE



**Promap**  
LANDSCAPE ARCHITECTS

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Plotted Scale - 1:1000. Paper Size - A4

Title Number: CYM839162



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Plotted Scale - 1:750. Paper Size - A4

Title Number: WA552132

## ANNEXE 6 – NEWBURY SITE



**Promap**  
LANDSCAPE ARCHITECTS

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Plotted Scale - 1:750. Paper Size - A4

Title Number: BK365055

**IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION**

**CLAIM NO. KB-2024-004175**

**Before the Honourable Mr Justice Bourne  
20 December 2024**

**B E T W E E N:**

**TELEDYNE UK LIMITED**

**-and-**

**(1) JULIAN ALLEN GAO**

**(2) RUBY HAMILL**

**(3) DANIEL JONES**

**(4) NAJAM SHAH**

**(5) RICKY SOUTHALL**

**(6) AMAREEN AFZAL**

**(7) SERENA FENTON**



**KB-2024-004175**

**(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**

**Defendants**

(12) **THE CHIEF CONSTABLE OF WEST YORKSHIRE POLICE**

**Respondent**

---

**ORDER**

---

**UPON** reading the Application dated 16 December 2024 made by the Claimant pursuant to CPR 31.17 (the ‘Application’)

**AND UPON** reading the witness statement of Stephen William Simpson for and on behalf of the Respondent, in which it is confirmed that the Respondent remains neutral on the Application

**AND UPON** the Court hearing Natalie Pratt of counsel and the Respondent not appearing or being represented

**IT IS ORDERED THAT:**

**Definitions**

1. For the purpose of this Order:
  - 1.1 The “**Shipley Site**” shall mean Teledyne UK Limited’s site at Airedale House, Acorn Park, Shipley BD17 7SW;
  - 1.2 The “**Road**” shall mean the road known as Acorn Park, Shipley.

**Order**

2. The Respondent shall disclose to and permit the Claimant inspection of the

following documents within its control:

- 2.1 the occurrence logs for the incidents that occurred at the Shipley Site on 26/12/23, 02/04/24, 15/05/24 and 19/12/24, which logs provide the name, addresses, email addresses and telephone numbers of any person arrested by one of the Respondent's officers in the course of, or as a result of, protest (including, but not limited to, acts of trespass) at the Shipley Site or on the Road; and
  - 2.2 documents which provide the names, addresses, email addresses and telephone numbers of any person who was asked to leave the Shipley Site by one of the Respondent's officers during the course of the incidents that occurred at the Shipley Site on 26/12/23, 02/04/24, 15/05/24 and 19/12/24; and
  - 2.3 photographic material and any evidentially relevant material, including witness statements and written/taped interview records, relating to any person arrested by one of the Respondent's officers during the course of the incidents that occurred at the Shipley Site (or on the Road) on 26/12/23, 02/04/24, 15/05/24 and 19/12/24; and
  - 2.4 the incident logs that provide the name, addresses, email addresses and telephone numbers of any person arrested by one of the Respondent's officers in the course of, or as a result of, protest (including, but not limited to, acts of trespass and obstruction of the highway) at the Shipley Site or on the Road on any occasion throughout 2024 and until the date of disclosure, along with any photographic material and any evidentially relevant material relating to any person arrested.
  - 2.5 details of any remaining conditions or restrictions from attending the Claimant's sites placed on any person so arrested and subsequently released on bail by the Respondent.
3. The Respondent, when providing disclosure of the documents described in paragraph 2, shall:
- 3.1 specify documents which are no longer in its control (if any);
  - 3.2 specify documents over which it claims a right or duty to withhold inspection (if any);
  - 3.3 be entitled to redact any information on the grounds of public interest immunity or legal privilege;
  - 3.4 be entitled to redact any information on the grounds of sub judice. Once the sub judice reasons for redaction conclude, then the Claimant will be at liberty to request an un-redacted version of the documents and the Respondent shall provide a copy for inspection.

4. The duty to disclose the matters specified in paragraph 2 above shall be ongoing and continue until 4pm on 28 February 2025, unless extended by further order.
5. The Claimant shall pay the Respondent's reasonable costs of and occasioned by this Application and the disclosure, to be assessed in default of agreement.

Dated this 20<sup>th</sup> day of December 2024

**Service of the order**

The court has provided a sealed copy of this order to the serving party: Keystone Law at 48 Chancery Lane, London WC2A 1JF (Ref: TEL14/40)

**IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION**

**CLAIM NO. KB-2024-004175**

**Before the Honourable Mr Justice Bourne  
20 December 2024**

**B E T W E E N:**

**TELEDYNE UK LIMITED**

**-and-**

**(1) JULIAN ALLEN GAO**

**(2) RUBY HAMILL**

**(3) DANIEL JONES**

**(4) NAJAM SHAH**

**(5) RICKY SOUTHALL**

**(6) AMAREEN AFZAL**

**(7) SERENA FENTON**



**KB-2024-004175**

**(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**

**Defendants**

(12) **THE CHIEF CONSTABLE OF MERSEYSIDE POLICE**

**Respondent**

---

**ORDER**

---

**UPON** reading the Application dated 20 December 2024 made by the Claimant pursuant to CPR 31.17 (the ‘Application’)

**AND UPON** reading the witness statement of Manan Singh for and on behalf of the Claimant, in which it is confirmed that the Respondent remains neutral on the Application

**AND UPON** the Court considering the Application on the papers and without a hearing

**IT IS ORDERED THAT:**

**Definitions**

1. For the purpose of this Order:

1.1 The “**Wirral Site**” shall mean Teledyne UK Limited’s site at Unit A, 6 Tebay Road, Bromborough, Birkenhead, Wirral CH62 3PA.

**Order**

2. The Respondent shall disclose to and permit the Claimant inspection of the following documents within its control:

2.1 any record of the name, addresses, email addresses and telephone numbers of any person who has been arrested by one of their officers in the course of, or as a result of, protests (including, but not limited to,

- acts of trespass) at the Wirral Site, as defined in paragraph 1.1 above;
- 2.2 all, officer bodycam footage, CCTV and drone footage from the Wirral Site, and officer MG11 witness statements (including any exhibit) relating to any person who has been arrested by one of their officers in the course of, or as a result of, protests (including, but not limited to, acts of trespass) at the Wirral Site, as defined in paragraph 1.1 above;
  - 2.3 any record which provides names and addresses of any person asked to leave the Wirral Site by one of their officers in the course of, or as a result of, protests at the Wirral Site, as defined in paragraph 1.1 above; and
  - 2.4 any record which confirms whether any of the persons referred to in paragraphs 2.1 and 2.3 above are subject to bail conditions and, if so, the identity of that person and the relevant conditions to which their bail is subjected.
3. The Respondent shall specify when providing disclosure of the documents described in paragraph 2:
    - 3.1 which documents are no longer in its control and what has happened to those documents; and
    - 3.2 the documents over which it claims a right or duty to withhold inspection.
  4. The duty to disclose the matters specified in paragraph 2 above shall be ongoing and continue until 4pm on 28 February 2025, unless extended by further order.
  5. The Claimant shall pay the Respondent's reasonable costs of this Application, agreed in the sum of £500 plus VAT. The Claimant shall also pay the Respondent's reasonable costs of disclosure and permitting inspection, to be calculated in accordance with Appendix 3 of the Merseyside Police's internal disclosure policy document.

Dated this 20<sup>th</sup> day of December 2024

### **Service of the order**

The court has provided a sealed copy of this order to the serving party: Keystone Law at 48 Chancery Lane, London WC2A 1JF (Ref: TEL14/40)

**IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION**

**CLAIM NO. KB-2024-004175**

**Mr Justice Johnson**

**B E T W E E N**



**KB-2024-004175**

**TELEDYNE UK LIMITED**

**Claimant**

**-and-**

**(1) JULIAN ALLEN GAO**

**(2) RUBY HAMILL**

**(3) DANIEL JONES**

**(4) NAJAM SHAH**

**(5) RICKY SOUTHALL**

**(6) AMAREEN AFZAL**

**(7) SERENA FENTON**

**(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**

**Defendants**

**(12) THE CHIEF CONSTABLE OF MERSEYSIDE POLICE**

**Respondent**

## **ORDER**

---

**UPON** reading the Application dated 20 December 2024 made by the Claimant pursuant to CPR 31.17 (the ‘Application’)

**AND UPON** reading the witness statement of Manan Singh for and on behalf of the Claimant, in which it is confirmed that the Respondent remains neutral on the Application

**AND UPON** the Court considering the Application on the papers and without a hearing

**IT IS ORDERED THAT:**

### **Definitions**

1. For the purpose of this Order:

- 1.1 The “**Wirral Site**” shall mean Teledyne UK Limited’s site at Unit A, 6 Tebay Road, Bromborough, Birkenhead, Wirral CH62 3PA.

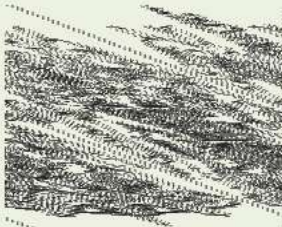
## **Order**

2. The Respondent shall disclose to and permit the Claimant inspection of the following documents within its control:
  - 2.1 any record of the name, addresses, email addresses and telephone numbers of any person who has been arrested by one of their officers in the course of, or as a result of, protests (including, but not limited to, acts of trespass) at the Wirral Site, as defined in paragraph 1.1 above;
  - 2.2 all, officer bodycam footage, CCTV and drone footage from the Wirral Site, and officer MG11 witness statements (including any exhibit) relating to any person who has been arrested by one of their officers in the course of, or as a result of, protests (including, but not limited to, acts of trespass) at the Wirral Site, as defined in paragraph 1.1 above;
  - 2.3 any record which provides names and addresses of any person asked to leave the Wirral Site by one of their officers in the course of, or as a result of, protests at the Wirral Site, as defined in paragraph 1.1 above; and
  - 2.4 any record which confirms whether any of the persons referred to in paragraphs 2.1 and 2.3 above are subject to bail conditions and, if so, the identity of that person and the relevant conditions to which their bail is subjected.
3. The Respondent shall specify when providing disclosure of the documents described in paragraph 2:
  - 3.1 which documents are no longer in its control and what has happened to those documents; and
  - 3.2 the documents over which it claims a right or duty to withhold inspection.
4. The duty to disclose the matters specified in paragraph 2 above shall be ongoing and continue until 4pm on 28 February 2025, unless extended by further order.
5. The Claimant shall pay the Respondent's reasonable costs of this Application, agreed in the sum of £500 plus VAT. The Claimant shall also pay the Respondent's reasonable costs of disclosure and permitting inspection, to be calculated in accordance with Appendix 3 of the Merseyside Police's internal disclosure policy document.
6. Any party may apply on notice to set aside or vary this order. Any such application must be made within 7 days of service of this order.

Dated this 20<sup>th</sup> day of December 2024

**Service of the order**

The court has provided a sealed copy of this order to the serving party: Keystone Law at 48 Chancery Lane, London WC2A 1JF (Ref: TEL14/40)



**Re-Amended**  
**Claim Form**  
**(CPR Part 8)**

In the High Court of Justice, King's Bench Division											
Claim no.											
Fee Account no.	PBA0087115										
Help with Fees - Ref no. (if appli- cable)	<table><tr><td>H</td><td>W</td><td>F</td><td>-</td><td></td><td></td><td>-</td><td></td><td></td><td></td></tr></table>	H	W	F	-			-			
H	W	F	-			-					

Re-Amended Claim Form pursuant to the Order of Murray J dated 21 March 2025

Amended Claim Form pursuant to the Order of Tipples J dated 24 January 2025

**Claimant**

TELEDYNE UK LIMITED (Company number 00432014)  
106 Waterhouse Lane  
Chelmsford  
Essex  
CM1 2QU

**Defendant(s)**

See Schedule 1



KB-2024-004175

Does your claim include any issues under the Human Rights Act 1998? ☐ Yes ☒ No

Details of claim (see also overleaf)

See attached 'Details of Claim'.

Defendant's  
name and  
address

See Schedule 1

	£
Court fee	626
Legal representative's costs	TBC
Issue date	

For further details of the courts [www.gov.uk/find-court-tribunal](http://www.gov.uk/find-court-tribunal).

When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

Claim no.	
-----------	--

Details of claim (continued)

Keystone Law  
48 Chancery Lane, Holborn  
WC2A 1JF

DX: 193 Chancery Lane

manan.singh@keystonelaw.co.uk  
info.teledyne@keystonelaw.co.uk

Claimant's or claimant's legal representative's address to which documents should be sent if different from overleaf. If you are prepared to accept service by DX, fax or e-mail, please add details.

## Statement of Truth

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.

☐ **I believe** that the facts stated in these particulars of claim are true.

☒ **The Claimant believes** that the facts stated in these particulars of claim are true. **I am authorised** by the claimant to sign this statement.

### Signature

*M Singh*

☐ Claimant

☐ Litigation friend (where claimant is a child or a Protected Party)

☒ Claimant's legal representative (as defined by CPR 2.3(1))

### Date

Day

13

Month

12

Year

2024

Re-dated on 27 January 2025

Re-dated on 24 March 2025

Full name

MANAN SINGH

Name of claimant's legal representative's firm

KEYSTONE LAW

If signing on behalf of firm or company give position or office held

PARTNER

Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form: <https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>

## **SCHEDULE 1 – DEFENDANTS**

1. JULIAN ALLEN GAO of 11 Ellesmere Place, Walton-on-Thames, Surrey KT12 5AE
2. RUBY HAMILL of 14A Emu Road, Wandsworth, London SW8 3PR
3. DANIEL JONES of 2 Rossett Road, Crosby, Sefton L23 3AW
4. NAJAM SHAH of 24 Cliffe Gardens, Shipley, Bradford BD18 3DB
5. RICKY SOUTHALL of 3 Clarendon Street, Wakefield, West Yorkshire WF1 3RQ
6. AMAREEN AFZAL of 11 North Hill Road, Flat F, Headingley, Leeds, West Yorkshire LS6 2EN
7. SERENA FENTON of 19 Foxcroft Green, Headingley, Leeds, West Yorkshire LS6 3NR
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. CHERYL LEANAGHAN of 33 Faulkner Square, Flat 2, Liverpool, Merseyside L8 7NZ
13. MAIS ROBINSON of The Trees, 83-89 Amhurst Park, Flat 24, Hackney, London N16 5DP
14. AUTUMN TAYLOR-WARD of 88 Allington Street, Liverpool, Merseyside L17 7AF
15. ANABELLA BARRINGER of 8 Furance Hill, Flat 4, Sheffield S3 7AF
16. LARA DOWNES of 49 Gipsy Hill, Flat 3, London SE19 1QH
17. GABRIELLE MIDDLETON of 21 Athelstan Road, Margate, Kent CT9 2BD
18. LUKE CARTER of 34 Broad Road, Lower Willingdon, East Sussex BN20 9QU
19. MARY ENSELL of 24 Aylton Road, Huyton, Merseyside L36 2LU
20. HARRY WADE of Beaumont, 178 Leverington Road, Wisbech, Cambridgeshire PE13 1RU

## **SCHEDULE 2 – THE SITES**

1. The ‘**Shipley Site**’ (Teledyne UK Limited, Airedale House, Acorn Park, Shipley BD17 7SW);
2. The ‘**Lincoln Site**’ (Teledyne UK Limited, 168 Sadler Road, Lincoln LN6 3RS);
3. The ‘**Wirral Site**’ (Teledyne UK Limited, Unit A, 6 Tebay Road, Bromborough, Birkenhead, Wirral CH62 3PA);
4. The ‘**Chelmsford Site**’ (Teledyne UK Limited, 106 Waterhouse Lane, Chelmsford CM1 2QU);
5. The ‘**Presteigne Site**’ (Teledyne UK Limited, Broadaxe Business Park, Presteigne LD8 2UH); and
6. The ‘**Newbury Site**’ (Teledyne UK Limited, Reynolds Navigation House, Canal View Road, Newbury RG14 5UR).

### **SCHEDULE 3 – THE ROADS**

1. Acorn Park, Shipley.

## **DETAILS OF CLAIM**

1. The Claimant, Teledyne UK Limited is a company incorporated in England and Wales on 28 March 1947 under company number 00432014. Its registered address is at 106 Waterhouse Lane, Chelmsford, Essex CM21 2QU.
2. The Claimant is a global leader in specialised components and subsystems for innovative solutions in medical, science, aerospace, defence and industrial applications. Specifically, the Claimant is known for its innovation in semi-conductors, high power RF, imaging and precision timing and engineered systems.
3. The Claimant holds the freehold title to:
  - a. The **‘Shipley Site’** (Teledyne UK Limited, Airedale House, Acorn Park, Shipley BD17 7SW), which is registered at HM Land Registry under Title Number WYK387275;
  - b. The **‘Chelmsford Site’** (Teledyne UK Limited, 106 Waterhouse Lane, Chelmsford CM1 2QU), which is registered at HM Land Registry under Title Number EX688035; and
  - c. The **‘Lincoln Site’** (Teledyne UK Limited, 168 Sadler Road, Lincoln LN6 3RS), which is registered at HM Land Registry under Title Number LL317736.
4. The Claimant also holds the leasehold title to:
  - a. The **‘Wirral Site’** (Teledyne UK Limited, Unit A, 6 Tebay Road, Bromborough, Birkenhead, Wirral CH62 3PA), which is registered at HM Land Registry under Title Number MS575234;
  - b. The **‘Presteigne Site’** (Teledyne UK Limited, Broadaxe Business Park, Presteigne LD8 2UH). Unit 1 of the site is registered at HM Land Registry under Title Number CYM839162. Units 5 and 6 are held by the Claimant pursuant to a lease dated 9

October 2024 for a term of 5 years, which is not registrable at HM Land Registry; and

- c. The **‘Newbury Site’** (Teledyne UK Limited, Reynolds Navigation House, Canal View Road, Newbury RG14 5UR), which is registered at HM Land Registry under Title Number BK365055.
5. The six sites shall be referred to collectively as the ‘Claimant’s Sites’. The Shipley, Lincoln and Chelmsford Sites hold Facility Security Clearance (formerly known as ‘List X’ status), which is requirement of being a UK Government defence supplier. Facility Security Clearance is required as the Claimant holds contracts with the UK Ministry of Defence which requires it to safeguard assets classified SECRET or above on it premises.
6. The Defendants are:
  - a. Named Defendants, as listed at Schedule 1 to this Claim Form. Each of the Named Defendants has been identified as having attended one of the Claimant’s Sites and engaged in alleged acts of unlawful protest (specifically trespass, with aggravating features). Each of the Named Defendants has been arrested in connection with those acts of protest; and
  - b. Various defined categories of Persons Unknown (defined to capture the relevant causes of action and conduct that the Claimant seeks to prohibit).
7. Specifically, as to the Named Defendants:
  - a. Julian Allen Gao, Ruby Hamill, Daniel Jones and Najam Shah were all arrested at the Shipley Site on 2 April 2024;
  - b. Ricky Southall, Amareen Afzal and Serena Fenton were all arrested at the Shipley Site on 15 May 2024;

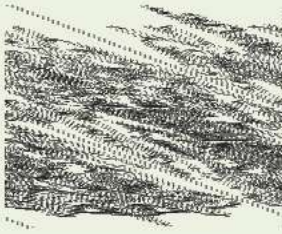
- c. Cheryl Leanaghan, Mais Robinson, Autumn Taylor-Ward, Anabella Barringer, Lara Downes and Gabrielle Middleton were all arrested at the Wirral Site on either 5 July 2024 or 2 October 2024;
  - d. Luke Carter was arrested at the Shipley Site on 19 December 2024;
  - e. Mary Ensell and Harry Wade were both arrested at the Shipley Site on 28 January 2025.
8. The circumstances of the arrests are further explained in the witness statement of Nicholas James Wargent, which accompanies this Claim Form.
9. The Claimant seeks injunctive relief to restrain:
- a. Trespass on the Claimant's Sites;
  - b. Interference with the Claimant's common law right (and the right of its assigns and licensees) to access the highway from its Sites (in relation to the Shipley Site only);  
and
  - c. Public nuisance caused by obstruction of the highway (in relation to the Shipley Site only).
10. The Claimant seeks injunctive relief by reason of it being reasonably apprehended that the Defendants will engage imminently in further unlawful acts of protest at the Claimant's Sites, which will cause further significant loss and harm to the Claimant.
11. The Claimant's reasonable apprehension arises from:
- a. By reason of its business, the Claimant, and the Claimant's Sites, are the likely target of protest (including unlawful direct-action protest) by those who associate with groups such as (but not limited to) 'Palestine Action' and 'Bradford Friends of Palestine';

- b. The Claimant having already experienced unlawful acts of protest at its sites during 2022 and 2023, and with a notable increase in frequency throughout 2024. Typically, those protests have been carried out by persons who associate with groups such as (but not limited to) 'Palestine Action' and 'Bradford Friends of Palestine', and have included acts of aggravated trespass (at the Shipley, Wirral, Presteigne and Chelmsford Sites) and the obstruction of access at the Shipley Site;
  - c. The continued deterioration of the situation in the Middle East (that being the motivating cause behind the protests);
  - d. The continued and active recruitment of potential activists by the group known as 'Palestine Action', alongside the programme of direct-action training being offered by that group at this time, and the content of the group's so-called 'Underground Manual' (which instructs and advises activists how to undertake direct action, and encourages unlawful acts such as trespass, aggravated trespass and criminal damage);
  - e. The imminent Christmas holiday period, in which it is expected that people (including those who may be inclined to attend the Claimant's Sites and engage in acts of unlawful direct-action protest) will have more disposable time, during which they may attend the Claimant's Sites and engage in acts of unlawful direct-action protest.
12. The details of the loss and harm suffered by the Claimant by reason of the alleged acts of unlawful protest that have already occurred at its sites are set out in the witness statement of Nicholas James Wargent, which accompanies this Claim Form. In summary, that loss and harm includes (but is not limited to) significant property damage caused by acts of aggravated trespass, and the costs incurred in the repair and remedying of that damage. Further, losses to the Claimant include increased security costs to guard against and mitigate the harm caused by acts of unlawful protest, as well as a loss of productivity at sites where production is interfered with, whether by reason of the property damage suffered or by reason of access to the site being obstructed, and employees and visitors to the site being unable to access the site during the working day.

13. For the foregoing reasons, the Claimant reasonably apprehends further acts of unlawful protest at its sites, which will cause further significant loss and harm in the same nature of that already suffered, and seeks injunctive relief accordingly.
14. It is necessary to bring this Claim against newcomer Persons Unknown as well as named Defendants as it has not yet been possible to name all those persons who may attend the Claimant's Sites and engage in unlawful acts of protest. In particular, by reason of the continued recruitment of activists and the encouragement of unlawful acts of protest by groups such as Palestine Action, it is impossible for the Claimant to know who may attend the Claimant's Sites in the future and commit those acts.

AND the Claimant Claims:

- (1) The injunctive relief set out in the draft injunction order;
- (2) The alternative service orders set out in the draft injunction order;
- (3) Further or other relief as the court thinks fit; and
- (4) Costs.



## Claim Form (CPR Part 8)

In the High Court of Justice, King's Bench Division											
Claim no.											
Fee Account no.	PBA0087115										
Help with Fees - Ref no. (if appli- cable)	<table><tr><td>H</td><td>W</td><td>F</td><td>-</td><td></td><td></td><td>-</td><td></td><td></td><td></td></tr></table>	H	W	F	-			-			
H	W	F	-			-					

Amended Claim Form pursuant to the Order of Tipples J dated 24 January 2025

### Claimant

TELEDYNE UK LIMITED (Company number 00432014)  
106 Waterhouse Lane  
Chelmsford  
Essex  
CM1 2QU



KB-2024-004175

### Defendant(s)

See Schedule 1

Does your claim include any issues under the Human Rights Act 1998? ☐ Yes ☒ No

Details of claim (see also overleaf)

See attached 'Details of Claim'.

Defendant's  
name and  
address

See Schedule 1

	£
Court fee	626
Legal representative's costs	TBC
Issue date	

For further details of the courts [www.gov.uk/find-court-tribunal](http://www.gov.uk/find-court-tribunal).

When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

Claim no.	
-----------	--

Details of claim (continued)

Keystone Law  
48 Chancery Lane, Holborn  
WC2A 1JF

DX: 193 Chancery Lane

manan.singh@keystonelaw.co.uk  
info.teledyne@keystonelaw.co.uk

Claimant's or claimant's legal representative's address to which documents should be sent if different from overleaf. If you are prepared to accept service by DX, fax or e-mail, please add details.

## Statement of Truth

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.

☐ **I believe** that the facts stated in these particulars of claim are true.

☒ **The Claimant believes** that the facts stated in these particulars of claim are true. **I am authorised** by the claimant to sign this statement.

### Signature

*M Singh*

☐ Claimant

☐ Litigation friend (where claimant is a child or a Protected Party)

☒ Claimant's legal representative (as defined by CPR 2.3(1))

### Date

Day

13

Month

12

Year

2024

Re-dated on 27 January 2025

Full name

MANAN SINGH

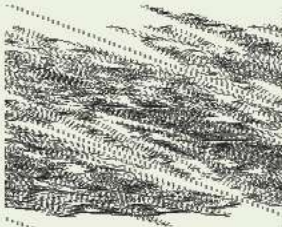
Name of claimant's legal representative's firm

KEYSTONE LAW

If signing on behalf of firm or company give position or office held

PARTNER

Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form: <https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>



## Claim Form (CPR Part 8)

In the High Court of Justice, King's Bench Division

Claim no.

Fee Account no.

PBA0087115

Help with Fees -  
Ref no. (if appli-  
cable)

H W F - - - - -

### Claimant

TELEDYNE UK LIMITED (Company number 00432014)  
106 Waterhouse Lane  
Chelmsford  
Essex  
CM1 2QU



KB-2024-004175

### Defendant(s)

See Schedule 1

Does your claim include any issues under the Human Rights Act 1998? ☐ Yes ☒ No

Details of claim (see also overleaf)

See attached 'Details of Claim'.

Defendant's  
name and  
address

See Schedule 1

£

Court fee

626

Legal representative's  
costs

TBC

Issue date

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When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

Claim no.	
-----------	--

Details of claim (continued)

Keystone Law  
48 Chancery Lane, Holborn  
WC2A 1JF

DX: 193 Chancery Lane

manan.singh@keystonelaw.co.uk  
info.teledyne@keystonelaw.co.uk

Claimant's or claimant's legal representative's address to which documents should be sent if different from overleaf. If you are prepared to accept service by DX, fax or e-mail, please add details.

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☒ **The Claimant believes** that the facts stated in these particulars of claim are true. **I am authorised** by the claimant to sign this statement.

### Signature

*M Singh*

☐ Claimant

☐ Litigation friend (where claimant is a child or a Protected Party)

☒ Claimant's legal representative (as defined by CPR 2.3(1))

### Date

Day

13

Month

12

Year

2024

Full name

MANAN SINGH

Name of claimant's legal representative's firm

KEYSTONE LAW

If signing on behalf of firm or company give position or office held

PARTNER

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# Application notice


For help in completing this form please read the notes for guidance form N244 Notes.

Find out how HM Courts and Tribunals Service uses personal information you give them

when you fill in a form:

[https://www.gov.uk/](https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter)

[government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter](https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter)

Name of court <b>HIGH COURT OF JUSTICE, KING'S BENCH DIVISION</b>		Claim no. <b>KB-2024-004175</b>
Fee account no. (if applicable)	Help with Fees - Ref. no. (if applicable)	
<b>PBA0087115</b>	<div style="border: 1px solid black; padding: 2px;"> <div style="display: inline-block; border: 1px solid black; padding: 0 5px;">H</div> <div style="display: inline-block; border: 1px solid black; padding: 0 5px;">W</div> <div style="display: inline-block; border: 1px solid black; padding: 0 5px;">F</div> <div style="display: inline-block; padding: 0 5px;">-</div> <div style="display: inline-block; border: 1px solid black; width: 20px; height: 15px;"></div> <div style="display: inline-block; padding: 0 5px;">-</div> <div style="display: inline-block; border: 1px solid black; width: 20px; height: 15px;"></div> </div>	
Warrant no. (if applicable)		
Claimant's name (including ref.) <b>TELEDYNE UK LIMITED (TEL14/40)</b>		
Defendant's name (including ref.) <b>See Schedule 1</b>		
Date	<div style="text-align: center;">  <p><b>13 Feb 2025</b> 13 February 2025</p> </div>	

KB-2024-004175

Sub Event ID: 64

1. What is your name or, if you are a legal representative, the name of your firm?

Keystone Law

2. Are you a ☐ Claimant ☐ Defendant ☒ Legal Representative

☐ Other (please specify)

If you are a legal representative whom do you represent?

Claimant

3. What order are you asking the court to make and why?

The Claimant seeks an Order (i) adding Mary Ensell and Harry Wade as the Nineteenth and Twentieth Defendants to the Claim respectively (pursuant to CPR 19.4), (ii) extending the scope of the interim injunctive relief granted by Tipples J on 24 January 2025 to Mary Ensell and Harry Wade, and (iii) directions to bring the Claim against Mary Ensell and Harry Wade to final hearing (those directions being the same as those made on 24 January 2025 by Tipples J in relation to all other Named Defendants in the Claim).

4. Have you attached a draft of the order you are applying for?

☒Yes

☐No

5. How do you want to have this application dealt with?

☐at a hearing

☒without a hearing

☐at a remote hearing

6. How long do you think the hearing will last? Is this time estimate agreed by all parties?

Hours

Minutes

☐Yes

☒No

7. Give details of any fixed trial date or period

N/A

8. What level of Judge does your hearing need?

Judge

9. Who should be served with this application?

Defendants

9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

10. What information will you be relying on, in support of your application?

☒ the attached witness statement

☐ the statement of case

☐ the evidence set out in the box below

If necessary, please continue on a separate sheet.

11. Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

☐ Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.

☒ No

## Statement of Truth

I understand that proceedings for contempt of court may be brought against a person 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.

☐ I believe that the facts stated in section 10 (and any continuation sheets) are true.

☒ The applicant believes that the facts stated in section 10 (and any continuation sheets) are true. I am authorised by the applicant to sign this statement.

### Signature

*M Singh*

☐ Applicant

☐ Litigation friend (where applicant is a child or a Protected Party)

☒ Applicant's legal representative (as defined by CPR 2.3(1))

### Date

Day

13

Month

02

Year

2025

### Full name

MANAN SINGH

### Name of applicant's legal representative's firm

KEYSTONE LAW

If signing on behalf of firm or company give position or office held

PARTNER

Applicant's address to which documents should be sent.

Building and street

48

Second line of address

CHANCERY LANE

Town or city

HOLBORN

County (optional)

Postcode

W C 2 A 1 U F

If applicable

Phone number

020 3319 3700

Fax phone number

DX number

193 Chancery Lane

Your Ref.

TEL14/40

Email

[Manan.Singh@keystonelaw.co.uk](mailto:Manan.Singh@keystonelaw.co.uk)  
[info.teledyne@keystonelaw.co.uk](mailto:info.teledyne@keystonelaw.co.uk)

## **SCHEDULE 1 – DEFENDANTS**

1. JULIAN ALLEN GAO of 11 Ellesmere Place, Walton-on-Thames, Surrey KT12 5AE
2. RUBY HAMILL of 14A Emu Road, Wandsworth, London SW8 3PR
3. DANIEL JONES of 2 Rossett Road, Crosby, Sefton L23 3AW
4. NAJAM SHAH of 24 Cliffe Gardens, Shipley, Bradford BD18 3DB
5. RICKY SOUTHALL of 3 Clarendon Street, Wakefield, West Yorkshire WF1 3RQ
6. AMAREEN AFZAL of 11 North Hill Road, Flat F, Headingley, Leeds, West Yorkshire LS6 2EN
7. SERENA FENTON of 19 Foxcroft Green, Headingley, Leeds, West Yorkshire LS6 3NR
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. CHERYL LEANAGHAN of 33 Faulkner Square, Flat 2, Liverpool, Merseyside L8 7NZ
13. MAIS ROBINSON of The Trees, 83-89 Amhurst Park, Flat 24, Hackney, London N16 5DP
14. AUTUMN TAYLOR-WARD of 88 Allington Street, Liverpool, Merseyside L17 7AF
15. ANABELLA BARRINGER of 8 Furance Hill, Flat 4, Sheffield S3 7AF
16. LARA DOWNES of 49 Gipsy Hill, Flat 3, London SE19 1QH
17. GABRIELLE MIDDLETON of 21 Athelstan Road, Margate, Kent CT9 2BD
18. LUKE CARTER of 34 Broad Road, Lower Willingdon, East Sussex BN20 9QU
19. MARY ENSELL of 24 Aylton Road, Huyton, Merseyside L36 2LU
20. HARRY WADE of Beaumont, 178 Leverington Road, Wisbech, Cambridgeshire PE13 1RU

## Application notice

For help in completing this form please read the notes for guidance form N244 Notes.

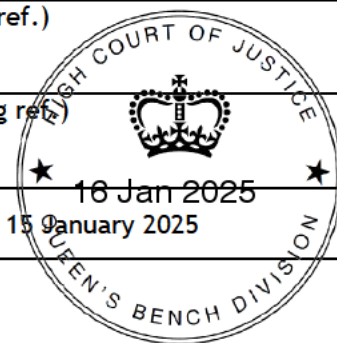
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[https://www.gov.uk/](https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter)

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Name of court HIGH COURT OF JUSTICE, KING'S BENCH DIVISION		Claim no. KB-2024-004175
Fee account no. (if applicable)	Help with Fees - Ref. no. (if applicable)	
PBA0087115	H W F - -	
Warrant no. (if applicable)		
Claimant's name (including ref.) TELEDYNE UK LIMITED (TEL14/40)		
Defendant's name (including ref.) See Schedule 1		
Date	16 Jan 2025 15 January 2025	



KB-2024-004175

Sub Event ID: 47

1. What is your name or, if you are a legal representative, the name of your firm?

Keystone Law

2. Are you a ☐ Claimant ☐ Defendant ☒ Legal Representative

☐ Other (please specify)

If you are a legal representative whom do you represent?

Claimant

3. What order are you asking the court to make and why?

The Claimant seeks an order: (i) continuing the interim injunctive relief granted by Bourne J on 20 December 2024, (ii) adding the proposed Twelfth to Eighteenth Defendants as Defendants to the Claim, pursuant to CPR 19.4, and extending the scope of the interim injunctive relief to those persons, (iii) permission to amend the Claim Form accordingly and (iv) directions.

4. Have you attached a draft of the order you are applying for?

☒Yes

☐No

5. How do you want to have this application dealt with?

☐at a hearing

☒without a hearing

☐at a remote hearing

6. How long do you think the hearing will last? Is this time estimate agreed by all parties?

Hours

Minutes

☐Yes

☒No

7. Give details of any fixed trial date or period

N/A

8. What level of Judge does your hearing need?

Judge

9. Who should be served with this application?

Defendants

9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

10. What information will you be relying on, in support of your application?

☒ the attached witness statement

☐ the statement of case

☐ the evidence set out in the box below

If necessary, please continue on a separate sheet.

11. Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

☐ Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.

☒ No

## Statement of Truth

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☒ **The applicant believes** that the facts stated in section 10 (and any continuation sheets) are true. **I am authorised** by the applicant to sign this statement.

### Signature

*M Singh*

☐ Applicant

☐ Litigation friend (where applicant is a child or a Protected Party)

☒ Applicant's legal representative (as defined by CPR 2.3(1))

### Date

Day

15

Month

01

Year

2025

### Full name

MANAN SINGH

### Name of applicant's legal representative's firm

KEYSTONE LAW

If signing on behalf of firm or company give position or office held

PARTNER

Applicant's address to which documents should be sent.

Building and street

48

Second line of address

CHANCERY LANE

Town or city

HOLBORN

County (optional)

Postcode

W C 2 A 1 U F

If applicable

Phone number

020 3319 3700

Fax phone number

DX number

193 Chancery Lane

Your Ref.

TEL14/40

Email

[Manan.Singh@keystonelaw.co.uk](mailto:Manan.Singh@keystonelaw.co.uk)  
[info.teledyne@keystonelaw.co.uk](mailto:info.teledyne@keystonelaw.co.uk)

## SCHEDULE 1 – DEFENDANTS

- (1) JULIAN ALLEN GAO of [REDACTED]
- (2) RUBY HAMILL of [REDACTED]
- (3) DANIEL JONES of [REDACTED]
- (4) NAJAM SHAH of [REDACTED]
- (5) RICKY SOUTHALL of [REDACTED]
- (6) AMAREEN AFZAL of [REDACTED]
- (7) SERENA FENTON of [REDACTED]
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  - 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) CHERYL LEANAGHAN of [REDACTED]
- (13) MAIS ROBINSON of [REDACTED]
- (14) AUTUMN TAYLOR-WARD of [REDACTED]

- (15) ANABELLA BARRINGER of [REDACTED]
- (16) LARA DOWNES of [REDACTED]
- (17) GABRIELLE MIDDLETON of [REDACTED]
- (18) LUKE CARTER of [REDACTED]

N244

## Application notice

For help in completing this form please read the notes for guidance form N244 Notes.

Find out how HM Courts and Tribunals Service uses personal information you give them

when you fill in a form:

<https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>

Name of court <b>HIGH COURT OF JUSTICE, KING'S BENCH DIVISION</b>		Claim no.
Fee account no. (if applicable)	Help with Fees - Ref. no. (if applicable)	
PBA0087115	H W F - -	
Warrant no. (if applicable)		
Claimant's name (including ref.) <b>TELEDYNE UK LIMITED (TEL14/40)</b>		
Defendant's name (including ref.) <b>See Schedule 1</b>		
Date	13 Dec 2024 13 December 2024	

KB-2024-004175

1. What is your name or, if you are a legal representative, the name of your firm?

Keystone Law

2. Are you a ☐ Claimant ☐ Defendant ☒ Legal Representative

☐ Other (please specify)

If you are a legal representative whom do you represent?

Claimant

3. What order are you asking the court to make and why?

The Claimant seeks interim injunctive relief pursuant to the Senior Courts Act 1981, s37(1) and CPR 25.1(1)(a) to restrain acts of trespass, interference with its common law right to access the highway from its land and public nuisance (obstruction of the highway).

The Claimant also seeks, pursuant to CPR 6.15 and CPR 6.27, an order permitting service by an alternative method of the Claim Form, Application for interim relief, all documents in support of the Claim and Application and any injunction order made.

The Claimant intends to make this Application on short notice to the Defendants.

4. Have you attached a draft of the order you are applying for?

☒ Yes

☐ No

5. How do you want to have this application dealt with?

☒ at a hearing

☐ without a hearing

☐ at a remote hearing

6. How long do you think the hearing will last? Is this time estimate agreed by all parties?

Hours

Minutes

☐ Yes

☒ No

7. Give details of any fixed trial date or period

N/A

8. What level of Judge does your hearing need?

Judge

9. Who should be served with this application?

Defendants

9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

10. What information will you be relying on, in support of your application?

☒ the attached witness statement

☐ the statement of case

☐ the evidence set out in the box below

If necessary, please continue on a separate sheet.

11. Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

☐ Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.

☒ No

## Statement of Truth

I understand that proceedings for contempt of court may be brought against a person 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.

☐ I believe that the facts stated in section 10 (and any continuation sheets) are true.

☒ The applicant believes that the facts stated in section 10 (and any continuation sheets) are true. I am authorised by the applicant to sign this statement.

### Signature

*M Singh*

☐ Applicant

☐ Litigation friend (where applicant is a child or a Protected Party)

☒ Applicant's legal representative (as defined by CPR 2.3(1))

### Date

Day

13

Month

12

Year

2024

### Full name

MANAN SINGH

### Name of applicant's legal representative's firm

KEYSTONE LAW

If signing on behalf of firm or company give position or office held

PARTNER

Applicant's address to which documents should be sent.

Building and street

48

Second line of address

CHANCERY LANE

Town or city

HOLBORN

County (optional)

Postcode

W C 2 A 1 J F

If applicable

Phone number

020 3319 3700

Fax phone number

DX number

193 Chancery Lane

Your Ref.

TEL14/40

Email

[Manan.Singh@keystonelaw.co.uk](mailto:Manan.Singh@keystonelaw.co.uk)  
[info.teledyne@keystonelaw.co.uk](mailto:info.teledyne@keystonelaw.co.uk)

SCHEDULE 1 - DEFENDANTS

- (1) JULIAN ALLEN GAO
  - (2) RUBY HAMILL
  - (3) DANIEL JONES
  - (4) NAJAM SHAH
  - (5) RICKY SOUTHALL
  - (6) AMAREEN AFZAL
  - (7) SERENA FENTON
- (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

# Certificate of service

On what day did you serve?

2 0 / 1 2 / 2 0 2 4

The date of service is

2 0 / 1 2 / 2 0 2 4

Name of court

High Court of Justice Kings Bench Division

Claim No.

KB-2024-004175

Name of Claimant

TELEDYNE UK LIMITED

Name of Defendant

JULIAN ALLEN GAO, RUBY HAMILL, DANIEL JONES, NAJAM SHAH, RICKY SOUTHALL, and others

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

See Schedule 1 Attached

On whom did you serve?

(If appropriate include their position e.g. partner, director).

Defendants named in the Orders

How did you serve the documents?

(please tick the appropriate box)

☐ by first class post or other service which provides for delivery on the next business day

☐ by delivering to or leaving at a permitted place

by personally handing it to or leaving it with

☐ (.....time left, where document is other than a claim form) (please specify)

☒ by other means permitted by the court (please specify)

In accordance with para 3 (iv) of the Order of Bourne J dated 20/12/2024. (Wirral, Shipley, Lincoln & Presteigne)

☐ by Document Exchange

☐ by fax machine (.....time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet)

☐ by other electronic means (.....time sent, where document is other than a claim form) (please specify)

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

Being the

☐ claimant's

☐ defendant's

☐ solicitor's

☐ litigation friend

☐ usual residence

☐ last known residence

☐ place of business

☐ principal place of business

☐ last known place of business

☐ last known principal place of business

☐ principal office of the partnership

☐ principal office of the corporation

☐ principal office of the company

☐ place of business of the partnership/company/corporation within the jurisdiction with a connection to claim


☐ other (please specify)

I believe that the facts stated in this certificate are true.

Full name

Nicholas Wargent

Signed



(Claimant) (Defendant) (solicitor) (s litigation friend)

Position or office held

General Counsel

(If signing on behalf of firm or company)

Date

1 3 / 0 1 / 2 0 2 5

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules ([www.justice.gov.uk](http://www.justice.gov.uk)) and you should refer to the rules for information.

#### **Calculation of deemed day of service of a claim**

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

#### **Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)**

<b>Method of service</b>	<b>Deemed day of service</b>
First class post or other service which provides for delivery on the next business day	The second day after it was posted, left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Document exchange	The second day after it was left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Delivering the document to or leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day before 4.30pm, on that day; or in any other case, on the next business day after that day
Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted
Other electronic method	If the email or other electronic transmission is sent on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was sent
Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

### **Schedule 1**

**Copies of the Order and the relevant court documents relating to the Order can be obtained below:**

1. Sealed Claim Form dated 13 December 2024
2. Sealed Application Notice dated 13 December 2024
3. Sealed Order dated 20 December 2024
4. Skeleton Argument

### **WITNESS STATEMENTS AND EXHIBITS**

1. First Witness Statement of Nicholas Wargent dated 13 December 2024
2. Exhibit NJW1
3. First Witness Statement of Manan Singh dated 13 December 2024
4. Exhibit MS1
5. Witness Statement of Stephen Simpson and Exhibit dated 16 December 2024
6. Second Witness Statement of Nicholas Wargent dated 19 December 2024
7. Exhibit NJW2
8. Second Witness Statement of Manan Singh dated 20 December 2024
9. Exhibit MS2

### **Third Party Disclosure Forms**

1. Application Notice - Merseyside Police
2. Sealed Order - Merseyside Police
3. Second Sealed Order - Merseyside Police
4. Application Notice - West Yorkshire Police
5. Sealed Order - West Yorkshire Police





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Title Number: WYK387275



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Plotted Scale - 1:1250. Paper Size - A4

Title Number: LL317736



**Promap**  
LANDMARK INFORMATION

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Plotted Scale - 1:1000. Paper Size - A4

Title Number: CYM839162



**Promap**  
LANDMARK INFORMATION

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Plotted Scale - 1:750. Paper Size - A4

Title Number: WA552132

# Certificate of service

On what day did you serve? 2 3 / 1 2 / 2 0 2 4

The date of service is 2 3 / 1 2 / 2 0 2 4

Name of court High Court of Justice Kings Bench Division	Claim No. KB-2024-004175
Name of Claimant TELEDYNE UK LIMITED	
Name of Defendant JULIAN ALLEN GAO, RUBY HAMILL, DANIEL JONES, NAJAM SHAH, RICKY SOUTHALL, and others	

What documents did you serve?  
*Please attach copies of the documents you  
have not already filed with the court.*

See Schedule 1 Attached

On whom did you serve?  
*(If appropriate include their position  
e.g. partner, director).*

Defendants named in the Orders

How did you serve the documents?  
*(please tick the appropriate box)*

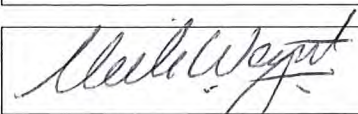
- ☐ by first class post or other service which provides for delivery on the next business day
- ☐ by delivering to or leaving at a permitted place
- by personally handing it to or leaving it with
- ☐ (.....time left, where document is other than a claim form) *(please specify)*
- ☒ by other means permitted by the court  
*(please specify)*
- In accordance with para 3 (iv) of the Order of Bourne J dated 20/12/2024. (Chelmsford and Newbury)
- ☐ by Document Exchange
- ☐ by fax machine (.....time sent, where document is other than a claim form) *(you may want to enclose a copy of the transmission sheet)*
- ☐ by other electronic means (.....time sent, where document is other than a claim form) *(please specify)*

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

Being the ☐ claimant's ☐ defendant's  
☐ solicitor's ☐ litigation friend

- ☐ usual residence
- ☐ last known residence
- ☐ place of business
- ☐ principal place of business
- ☐ last known place of business
- ☐ last known principal place of business
- ☐ principal office of the partnership
- ☐ principal office of the corporation
- ☐ principal office of the company
- ☐ place of business of the partnership/company/  
corporation within the jurisdiction with a connection to claim
- ☐ other *(please specify)*

I believe that the facts stated in this certificate are true.

Full name	Nicholas Wargent		
Signed		Position or office held	General Counsel
	(Claimant) (Defendant) (solicitor) (litigation friend)		(If signing on behalf of firm or company)
Date	1 3 / 0 1 / 2 0 2 5		

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4. Exhibit MS1
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6. Second Witness Statement of Nicholas Wargent dated 19 December 2024
7. Exhibit NJW2
8. Second Witness Statement of Manan Singh dated 20 December 2024
9. Exhibit MS2

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1. Application Notice - Merseyside Police
2. Sealed Order - Merseyside Police
3. Second Sealed Order - Merseyside Police
4. Application Notice - West Yorkshire Police
5. Sealed Order - West Yorkshire Police





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Plotted Scale - 1:750. Paper Size - A4

Title Number: BK365055

Certificate of service

Name of court High Court of Justice Kings Bench Division	Claim No. KB-2024-004175
Name of Claimant TELEDYNE UK LIMITED	
Name of Defendant JULIAN ALLEN GAO, RUBY HAMILL, DANIEL JONES, NAJAM SHAH, RICKY SOUTHALL, and Others	

On what day did you serve? 21/01/2025

The date of service is 21/01/2025

What documents did you serve?  
*Please attach copies of the documents you have not already filed with the court.*

See Schedule 1 Attached

On whom did you serve?  
*(If appropriate include their position e.g. partner, director).*

Defendants named in the Orders

How did you serve the documents?  
*(please tick the appropriate box)*

☐ by first class post or other service which provides for delivery on the next business day

☐ by delivering to or leaving at a permitted place

☐ by personally handing it to or leaving it with  
(.....time left, where document is other than a claim form) *(please specify)*

☒ by other means permitted by the court  
*(please specify)*

In accordance with para 3 of the Order of Bourne J, Order of Tipples J and Order of Murray J (Lincoln)

☐ by Document Exchange

☐ by fax machine (.....time sent, where document is other than a claim form) *(you may want to enclose a copy of the transmission sheet)*

☐ by other electronic means (.....time sent, where document is other than a claim form) *(please specify)*

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

Being the

☐ claimant's

☐ defendant's

☐ solicitor's

☐ litigation friend

☐ usual residence

☐ last known residence

☐ place of business

☐ principal place of business

☐ last known place of business

☐ last known principal place of business

☐ principal office of the partnership

☐ principal office of the corporation

☐ principal office of the company

☐ place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim


☐ other *(please specify)*

I believe that the facts stated in this certificate are true.

Full name

Manan Singh

Signed



(Claimant) (~~Defendant~~) (~~'s solicitor~~) (~~'s litigation friend~~)

Position or office held

Partner

(If signing on behalf of firm or company)

Date

06/06/2025

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules ([www.justice.gov.uk](http://www.justice.gov.uk)) and you should refer to the rules for information.

### **Calculation of deemed day of service of a claim**

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In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

## **Schedule 1**

### **INJUNCTION ORDERS**

1. Sealed Order of Tipples J dated 24 January 2025
2. Sealed Order of Murray J dated 21 March 2025

### **25 July Final Hearing Documents**

1. Fourth Witness Statement of Nicholas James Wargent
2. Exhibit NJW4
3. First Witness Statement of Scott Douglas Patterson
4. Exhibit SDP1
5. Fifth Witness Statement of Manan Singh
6. Exhibit MS5

### **13 February Application**

1. Sealed Application Notice dated 13 February 2025
2. Draft Order
3. Fourth Witness Statement of Manan Singh dated 13 February 2025
4. Exhibit MS4 dated 13 February 2025
5. Fifth Witness Statement of Manan Singh dated 18 March 2025
6. Exhibit MS5 dated 18 March 2025

### **24 January Return Date Hearing Applications and Documents**

1. 24 January Return Date Hearing Bundle
2. Skeleton argument (return date)
3. Application Notice seeking to add further Named Defendants
4. Draft Amended Claim Form dated 15 January 2025
5. Draft Order dated 15 January 2025
6. Third Witness Statement of Nicholas James Wargent dated 15 January 2025
7. Exhibit NJW-3 dated 15 January 2025
8. Third Witness Statement of Manan Singh dated 23 January 2025
9. Exhibit MS3 dated 23 January 2025

### **Part 8 Claim and Without Notice Injunction Application Documents**

1. Sealed Claim Form dated 13 December 2024
2. Sealed Application Notice dated 13 December 2024

3. Sealed Order dated 20 December 2024
4. Skeleton Argument
5. Amended Claim form
6. Sealed Amended Claim Form
7. Sealed Re-Amended Claim Form

**Part 8 Claim and Without Notice Injunction Application Witness Statements**

1. First Witness Statement of Nicholas Wargent dated 13 December 2024
2. Exhibit NJW1
3. First Witness Statement of Manan Singh dated 13 December 2024
4. Exhibit MS1
5. Witness Statement of Stephen Simpson and Exhibit dated 16 December 2024
6. Second Witness Statement of Nicholas Wargent dated 19 December 2024
7. Exhibit NJW2
8. Second Witness Statement of Manan Singh dated 20 December 2024
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**Third Party Disclosure Forms**

1. Application Notice - Merseyside Police
2. Sealed Order - Merseyside Police
3. Second Sealed Order - Merseyside Police
4. Application Notice - West Yorkshire Police
5. Sealed Order - West Yorkshire Police



Certificate of service

Name of court High Court of Justice Kings Bench Division	Claim No. KB-2024-004175
Name of Claimant TELEDYNE UK LIMITED	
Name of Defendant JULIAN ALLEN GAO, RUBY HAMILL, DANIEL JONES, NAJAM SHAH, RICKY SOUTHALL, and Others	

On what day did you serve? 3 1 / 0 1 / 2 0 2 5

The date of service is 3 1 / 0 1 / 2 0 2 5

What documents did you serve?  
*Please attach copies of the documents you have not already filed with the court.*

See Schedule 1 Attached

On whom did you serve?  
*(If appropriate include their position e.g. partner, director).*

Defendants named in the Orders

How did you serve the documents?  
*(please tick the appropriate box)*

☐ by first class post or other service which provides for delivery on the next business day

☐ by delivering to or leaving at a permitted place

☐ by personally handing it to or leaving it with (.....time left, where document is other than a claim form) *(please specify)*

☒ by other means permitted by the court *(please specify)*

In accordance with para 3 of the Order of Bourne J, Order of Tipples J and Order of Murray J (Chelmsford)

☐ by Document Exchange

☐ by fax machine (.....time sent, where document is other than a claim form) *(you may want to enclose a copy of the transmission sheet)*

☐ by other electronic means (.....time sent, where document is other than a claim form) *(please specify)*

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

Being the ☐ claimant's ☐ defendant's

☐ solicitor's ☐ litigation friend

☐ usual residence

☐ last known residence

☐ place of business

☐ principal place of business

☐ last known place of business

☐ last known principal place of business

☐ principal office of the partnership

☐ principal office of the corporation


☐ principal office of the company

☐ place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim

☐ other *(please specify)*

I believe that the facts stated in this certificate are true.

Full name Manan Singh

Signed  Position or office held Partner

(Claimant) (Defendant) ('s solicitor) ('s litigation friend) (If signing on behalf of firm or company)

Date 0 6 / 0 6 / 2 0 2 5

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Other electronic method	If the email or other electronic transmission is sent on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was sent
Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

## **Schedule 1**

### **INJUNCTION ORDERS**

1. Sealed Order of Tipples J dated 24 January 2025
2. Sealed Order of Murray J dated 21 March 2025

### **25 July Final Hearing Documents**

1. Fourth Witness Statement of Nicholas James Wargent
2. Exhibit NJW4
3. First Witness Statement of Scott Douglas Patterson
4. Exhibit SDP1
5. Fifth Witness Statement of Manan Singh
6. Exhibit MS5

### **13 February Application**

1. Sealed Application Notice dated 13 February 2025
2. Draft Order
3. Fourth Witness Statement of Manan Singh dated 13 February 2025
4. Exhibit MS4 dated 13 February 2025
5. Fifth Witness Statement of Manan Singh dated 18 March 2025
6. Exhibit MS5 dated 18 March 2025

### **24 January Return Date Hearing Applications and Documents**

1. 24 January Return Date Hearing Bundle
2. Skeleton argument (return date)
3. Application Notice seeking to add further Named Defendants
4. Draft Amended Claim Form dated 15 January 2025
5. Draft Order dated 15 January 2025
6. Third Witness Statement of Nicholas James Wargent dated 15 January 2025
7. Exhibit NJW-3 dated 15 January 2025
8. Third Witness Statement of Manan Singh dated 23 January 2025
9. Exhibit MS3 dated 23 January 2025

### **Part 8 Claim and Without Notice Injunction Application Documents**

1. Sealed Claim Form dated 13 December 2024
2. Sealed Application Notice dated 13 December 2024

3. Sealed Order dated 20 December 2024
4. Skeleton Argument
5. Amended Claim form
6. Sealed Amended Claim Form
7. Sealed Re-Amended Claim Form

**Part 8 Claim and Without Notice Injunction Application Witness Statements**

1. First Witness Statement of Nicholas Wargent dated 13 December 2024
2. Exhibit NJW1
3. First Witness Statement of Manan Singh dated 13 December 2024
4. Exhibit MS1
5. Witness Statement of Stephen Simpson and Exhibit dated 16 December 2024
6. Second Witness Statement of Nicholas Wargent dated 19 December 2024
7. Exhibit NJW2
8. Second Witness Statement of Manan Singh dated 20 December 2024
9. Exhibit MS2

**Third Party Disclosure Forms**

1. Application Notice - Merseyside Police
2. Sealed Order - Merseyside Police
3. Second Sealed Order - Merseyside Police
4. Application Notice - West Yorkshire Police
5. Sealed Order - West Yorkshire Police



Certificate of service

Name of court High Court of Justice Kings Bench Division	Claim No. KB-2024-004175
Name of Claimant TELEDYNE UK LIMITED	
Name of Defendant JULIAN ALLEN GAO, RUBY HAMILL, DANIEL JONES, NAJAM SHAH, RICKY SOUTHALL, and Others	

On what day did you serve? 17/02/2025

The date of service is 17/02/2025

What documents did you serve?  
*Please attach copies of the documents you have not already filed with the court.*

See Schedule 1 Attached

On whom did you serve?  
*(If appropriate include their position e.g. partner, director).*

Defendants named in the Orders

How did you serve the documents?  
*(please tick the appropriate box)*

☐ by first class post or other service which provides for delivery on the next business day

☐ by delivering to or leaving at a permitted place

☐ by personally handing it to or leaving it with  
(.....time left, where document is other than a claim form) *(please specify)*

☒ by other means permitted by the court  
*(please specify)*

☐ by Document Exchange

☐ by fax machine (.....time sent, where document is other than a claim form) *(you may want to enclose a copy of the transmission sheet)*

☐ by other electronic means (.....time sent, where document is other than a claim form) *(please specify)*

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

Being the

☐ claimant's

☐ defendant's

☐ solicitor's

☐ litigation friend

☐ usual residence

☐ last known residence

☐ place of business

☐ principal place of business

☐ last known place of business

☐ last known principal place of business

☐ principal office of the partnership

☐ principal office of the corporation

☐ principal office of the company

☐ place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim

☐ other *(please specify)*

I believe that the facts stated in this certificate are true.

Full name

Manan Singh

Signed

M Singh

(Claimant) (~~Defendant~~) (~~'s solicitor~~) (~~'s litigation friend~~)

Position or office held

Partner

(If signing on behalf of firm or company)

Date

06/06/2025

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules ([www.justice.gov.uk](http://www.justice.gov.uk)) and you should refer to the rules for information.

### **Calculation of deemed day of service of a claim**

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

### **Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)**

<b>Method of service</b>	<b>Deemed day of service</b>
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3. First Witness Statement of Scott Douglas Patterson
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5. Fifth Witness Statement of Manan Singh
6. Exhibit MS5

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2. Draft Order
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7. Exhibit NJW-3 dated 15 January 2025
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1. Sealed Claim Form dated 13 December 2024
2. Sealed Application Notice dated 13 December 2024

3. Sealed Order dated 20 December 2024
4. Skeleton Argument
5. Amended Claim form
6. Sealed Amended Claim Form
7. Sealed Re-Amended Claim Form

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2. Exhibit NJW1
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7. Exhibit NJW2
8. Second Witness Statement of Manan Singh dated 20 December 2024
9. Exhibit MS2

**Third Party Disclosure Forms**

1. Application Notice - Merseyside Police
2. Sealed Order - Merseyside Police
3. Second Sealed Order - Merseyside Police
4. Application Notice - West Yorkshire Police
5. Sealed Order - West Yorkshire Police



**Promap**  
LANDMARK INFORMATION

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Plotted Scale - 1:1250. Paper Size – A4

Title Number: WYK387275

Certificate of service

Name of court High Court of Justice Kings Bench Division	Claim No. KB-2024-004175
Name of Claimant TELEDYNE UK LIMITED	
Name of Defendant JULIAN ALLEN GAO, RUBY HAMILL, DANIEL JONES, NAJAM SHAH, RICKY SOUTHALL, and others	

On what day did you serve? 27/01/2025

The date of service is 27/01/2025

What documents did you serve?  
*Please attach copies of the documents you have not already filed with the court.*

See Schedule 1 Attached

On whom did you serve?  
*(If appropriate include their position e.g. partner, director).*

See Schedule 2 Attached

How did you serve the documents?  
*(please tick the appropriate box)*

☒ by first class post or other service which provides for delivery on the next business day

☐ by delivering to or leaving at a permitted place

☐ by personally handing it to or leaving it with (.....time left, where document is other than a claim form) *(please specify)*

☒ by other means permitted by the court *(please specify)*

In accordance with para 3 of the Order of Tipples J dated 24/01/2025.

☐ by Document Exchange

☐ by fax machine (.....time sent, where document is other than a claim form) *(you may want to enclose a copy of the transmission sheet)*

☐ by other electronic means (.....time sent, where document is other than a claim form) *(please specify)*

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

See Schedule 2 Attached

Being the ☐ claimant's ☒ defendant's

☐ solicitor's ☐ litigation friend

☒ usual residence

☒ last known residence

☐ place of business

☐ principal place of business

☐ last known place of business

☐ last known principal place of business

☐ principal office of the partnership

☐ principal office of the corporation


☐ principal office of the company

☐ place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim

☐ other *(please specify)*

I believe that the facts stated in this certificate are true.

Full name Manan Singh

Signed  \_\_\_\_\_

(Claimant) (~~Defendant~~) (~~'s solicitor~~) (~~'s litigation friend~~)

Position or office held Partner

(If signing on behalf of firm or company)

Date 27/01/2025

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules ([www.justice.gov.uk](http://www.justice.gov.uk)) and you should refer to the rules for information.

### **Calculation of deemed day of service of a claim**

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### **Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)**

<b>Method of service</b>	<b>Deemed day of service</b>
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Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted
Other electronic method	If the email or other electronic transmission is sent on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was sent
Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

### **Schedule 1**

1. Sealed Order of Tipples J dated 24 January 2025
2. Amended Claim Form
3. Sealed Application Notice
4. Third Witness Statement of Manan Singh
5. Exhibit MS3
6. Response Pack

## **Schedule 2**

**D1** JULIAN ALLEN GAO of 11 Ellesmere Place, Walton-on-Thames, Surrey KT12 5AE

**D2** RUBY HAMILL of 14A Emu Road, Wandsworth, London SW8 3PR

**D3** DANIEL JONES of 2 Rossett Road, Crosby, Sefton L23 3AW

**D4** NAJAM SHAH of 24 Cliffe Gardens, Shipley, Bradford BD18 3DB

**D5** RICKY SOUTHALL of 3 Clarendon Street, Wakefield, West Yorkshire WF1 3RQ

**D6** AMAREEN AFZAL of 11 North Hill Road, Flat F, Headingley, Leeds, West Yorkshire LS6 2EN

**D7** SERENA FENTON of 19 Foxcroft Green, Headingley, Leeds, West Yorkshire LS6 3NR

**D12** CHERYL LEANAGHAN of 33 Faulkner Square, Flat 2, Liverpool, Merseyside L8 7NZ

**D13** MAIS ROBINSON of The Trees, 83-89 Amhurst Park, Flat 24, Hackney, London N16 5DP

**D14** AUTUMN TAYLOR-WARD of 88 Allington Street, Liverpool, Merseyside L17 7AF

**D15** ANABELLA BARRINGER of 8 Furance Hill, Flat 4, Sheffield S3 7AF

**D16** LARA DOWNES of 49 Gipsy Hill, Flat 3, London SE19 1QH

**D17** GABRIELLE MIDDLETON of 21 Athelstan Road, Margate, Kent CT9 2BD

**D18** LUKE CARTER of 34 Broad Road, Lower Willingdon, East Sussex BN20 9QU

Certificate of service

Name of court High Court of Justice Kings Bench Division	Claim No. KB-2024-004175
Name of Claimant TELEDYNE UK LIMITED	
Name of Defendant JULIAN ALLEN GAO, RUBY HAMILL, DANIEL JONES, NAJAM SHAH, RICKY SOUTHALL, and others	

On what day did you serve? 27/01/2025

The date of service is 27/01/2025

What documents did you serve?  
Please attach copies of the documents you have not already filed with the court.

Schedule 1

On whom did you serve?  
(If appropriate include their position e.g. partner, director).

Defendant 8 - Defendant 11

How did you serve the documents?  
(please tick the appropriate box)

☐ by first class post or other service which provides for delivery on the next business day

☐ by delivering to or leaving at a permitted place

☐ by personally handing it to or leaving it with (.....time left, where document is other than a claim form) (please specify)

☒ by other means permitted by the court (please specify)

On Claimant injunction website in accordance with para 3 of the Order of Tipples J dated 24/01/2025.

☐ by Document Exchange

☐ by fax machine (.....time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet)

☐ by other electronic means (.....time sent, where document is other than a claim form) (please specify)

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

Being the ☐ claimant's ☐ defendant's ☐ solicitor's ☐ litigation friend

☐ usual residence

☐ last known residence

☐ place of business

☐ principal place of business

☐ last known place of business

☐ last known principal place of business

☐ principal office of the partnership

☐ principal office of the corporation

☐ principal office of the company

☐ place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim

☐ other (please specify)

I believe that the facts stated in this certificate are true.

Full name Manan Singh

Signed M Singh (Claimant) (Defendant) ('s solicitor) ('s litigation friend)

Position or office held Partner (If signing on behalf of firm or company)

Date 27/01/2025

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules ([www.justice.gov.uk](http://www.justice.gov.uk)) and you should refer to the rules for information.

### **Calculation of deemed day of service of a claim**

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

### **Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)**

<b>Method of service</b>	<b>Deemed day of service</b>
First class post or other service which provides for delivery on the next business day	The second day after it was posted, left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Document exchange	The second day after it was left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Delivering the document to or leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day before 4.30pm, on that day; or in any other case, on the next business day after that day
Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted
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Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

**Schedule 1**

1. Sealed Order of Tipples J dated 24 January 2025
2. Amended Claim Form
3. Sealed Application Notice

Certificate of service

Name of court High Court of Justice Kings Bench Division	Claim No. KB-2024-004175
Name of Claimant TELEDYNE UK LIMITED	
Name of Defendant JULIAN ALLEN GAO, RUBY HAMILL, DANIEL JONES, NAJAM SHAH, RICKY SOUTHALL, and others	

On what day did you serve? 27/01/2025

The date of service is 27/01/2025

What documents did you serve?  
Please attach copies of the documents you have not already filed with the court.

Schedule 1

On whom did you serve?  
(If appropriate include their position e.g. partner, director).

Defendant 8 - Defendant 11

How did you serve the documents?  
(please tick the appropriate box)

☐ by first class post or other service which provides for delivery on the next business day

☐ by delivering to or leaving at a permitted place

☐ by personally handing it to or leaving it with (.....time left, where document is other than a claim form) (please specify)

☒ by other means permitted by the court (please specify)

Email times at Schedule 2, in accordance with para 3 of the Order of Tipples J dated 24/01/2025.

☐ by Document Exchange

☐ by fax machine (.....time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet)

☒ by other electronic means (Sch 2.....time sent, where document is other than a claim form) (please specify)

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

See Schedule 2 Attached

Being the ☐ claimant's ☒ defendant's

☐ solicitor's ☐ litigation friend

☐ usual residence

☐ last known residence

☐ place of business

☐ principal place of business

☐ last known place of business

☐ last known principal place of business

☐ principal office of the partnership

☐ principal office of the corporation

☐ principal office of the company


☐ place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim

☒ other (please specify)

Known Email for Service

I believe that the facts stated in this certificate are true.

Full name Manan Singh

Signed  (Claimant) (Defendant) (solicitor) (litigation friend)

Position or office held Partner (If signing on behalf of firm or company)

Date 27/01/2025

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules ([www.justice.gov.uk](http://www.justice.gov.uk)) and you should refer to the rules for information.

### **Calculation of deemed day of service of a claim**

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

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### **Schedule 1**

1. Sealed Order of Tipples J dated 24 January 2025
2. Amended Claim Form
3. Sealed Application Notice
4. Response Pack

## **Schedule 2**

1. media@palestinecampaign.org - Email sent at:13:47
2. info@palestineaction.org - Email sent at:13:48
3. info@palestinecampaign.org - Email sent at:13:48
4. pscchelmsford@gmail.com - Email sent at: 13:48
5. pscshrop@gmail.com - Email sent at:13:49
6. lincolnpalestine@gmail.com - Email sent at:13:49
7. liverpoolfopal@gmail.com - Email sent at:13:49
8. palestinesolidaritybradford@gmail.com - Email sent at:13:49
9. branches@palestinecampaign.org - Email sent at:13:50
10. actions@palestineaction.org - Email sent at:13:50
11. bdfdfriendsofpalestine@yahoo.com - Email sent at:13:50

Certificate of service

Name of court High Court of Justice Kings Bench Division	Claim No. KB-2024-004175
Name of Claimant TELEDYNE UK LIMITED	
Name of Defendant JULIAN ALLEN GAO, RUBY HAMILL, DANIEL JONES, NAJAM SHAH, RICKY SOUTHALL, and Others	

On what day did you serve? 24/03/2025

The date of service is 24/03/2025

What documents did you serve?  
*Please attach copies of the documents you have not already filed with the court.*

See Schedule 1 Attached

On whom did you serve?  
*(If appropriate include their position e.g. partner, director).*

See Schedule 2 Attached

How did you serve the documents?  
*(please tick the appropriate box)*

☒ by first class post or other service which provides for delivery on the next business day

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(.....time left, where document is other than a claim form) *(please specify)*

☐ by other means permitted by the court  
*(please specify)*

☐ by Document Exchange

☐ by fax machine (.....time sent, where document is other than a claim form) *(you may want to enclose a copy of the transmission sheet)*

☐ by other electronic means (.....time sent, where document is other than a claim form) *(please specify)*

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

See Schedule 2 Attached

Being the

☐ claimant's

☒ defendant's

☐ solicitor's

☐ litigation friend

☒ usual residence

☒ last known residence

☐ place of business

☐ principal place of business

☐ last known place of business

☐ last known principal place of business

☐ principal office of the partnership

☐ principal office of the corporation

☐ principal office of the company

☐ place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim

☐ other *(please specify)*

I believe that the facts stated in this certificate are true.

Full name

Manan Singh

Signed

M Singh

(Claimant) (Defendant) ('s solicitor) ('s litigation friend)

Position or office held

Partner

(If signing on behalf of firm or company)

Date

24/03/2025

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## **Schedule 1**

### **INJUNCTION ORDERS**

1. Sealed Order of Murray J dated 21 March 2025

### **13 February 2025 Application**

2. Sealed Application Notice dated 13 February 2025
3. Draft Order
4. Fifth Witness Statement of Manan Singh dated 18 March 2025
5. Exhibit MS5 dated 18 March 2025

### **24 January 2025 Return Date Hearing Applications and Documents**

6. Skeleton argument (return date)
7. Application Notice seeking to add further Named Defendants
8. Draft Order dated 15 January 2025
9. Third Witness Statement of Nicholas James Wargent dated 15 January 2025
10. Exhibit NJW-3 dated 15 January 2025
11. Third Witness Statement of Manan Singh dated 23 January 2025
12. Exhibit MS3 dated 23 January 2025

### **Part 8 Claim and Without Notice Injunction Application Documents**

13. Sealed Re-Amended Claim Form dated 24 March 2025
14. Sealed Application Notice dated 13 December 2024
15. Sealed Order dated 20 December 2024
16. Skeleton Argument

### **Part 8 Claim and Without Notice Injunction Application Witness Statements**

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18. Exhibit NJW1
19. First Witness Statement of Manan Singh dated 13 December 2024
20. Exhibit MS1
21. Witness Statement of Stephen Simpson and Exhibit dated 16 December 2024

- 22. Second Witness Statement of Nicholas Wargent dated 19 December 2024
- 23. Exhibit NJW2
- 24. Second Witness Statement of Manan Singh dated 20 December 2024
- 25. Exhibit MS2

**Disclosure Orders**

- 26. Disclosure Order (West Yorkshire Police)
- 27. Disclosure Order (Merseyside Police)
- 28. Disclosure Order (Merseyside Police)

**Response Pack**

- 29. Response Pack

**Schedule 2**

**D19** MARY ENSELL of 24 Aylton Road, Huyton, Merseyside, L36 2LU

**D20** HARRY WADE of Beaumont, 178 Leverington Road, Wisbech, Cambridgeshire, PE13 1RU

Certificate of service

Name of court High Court of Justice Kings Bench Division	Claim No. KB-2024-004175
Name of Claimant TELEDYNE UK LIMITED	
Name of Defendant JULIAN ALLEN GAO, RUBY HAMILL, DANIEL JONES, NAJAM SHAH, RICKY SOUTHALL, and Others	

On what day did you serve?	24/03/2025
The date of service is	24/03/2025

What documents did you serve?  
*Please attach copies of the documents you have not already filed with the court.*

See Schedule 1

On whom did you serve?  
*(If appropriate include their position e.g. partner, director).*

Defendant 8 - Defendant 11

How did you serve the documents?  
*(please tick the appropriate box)*


<input type="checkbox"/>	by first class post or other service which provides for delivery on the next business day
<input type="checkbox"/>	by delivering to or leaving at a permitted place
<input type="checkbox"/>	by personally handing it to or leaving it with
<input type="checkbox"/>	(.....time left, where document is other than a claim form) <i>(please specify)</i>
<input checked="" type="checkbox"/>	by other means permitted by the court <i>(please specify)</i>
Email times at Schedule 2 and website, in accordance with para 3 of the Order of Murray J dated 21/03/2025.	
<input type="checkbox"/>	by Document Exchange
<input type="checkbox"/>	by fax machine (.....time sent, where document is other than a claim form) <i>(you may want to enclose a copy of the transmission sheet)</i>
<input checked="" type="checkbox"/>	by other electronic means (Sch 2.....time sent, where document is other than a claim form) <i>(please specify)</i>

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

See Schedule 2 Attached

Being the	<input type="checkbox"/> claimant's	<input checked="" type="checkbox"/> defendant's
	<input type="checkbox"/> solicitor's	<input type="checkbox"/> litigation friend
<input type="checkbox"/>	usual residence	
<input type="checkbox"/>	last known residence	
<input type="checkbox"/>	place of business	
<input type="checkbox"/>	principal place of business	
<input type="checkbox"/>	last known place of business	
<input type="checkbox"/>	last known principal place of business	
<input type="checkbox"/>	principal office of the partnership	
<input type="checkbox"/>	principal office of the corporation	
<input type="checkbox"/>	principal office of the company	
<input type="checkbox"/>	place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim	
<input checked="" type="checkbox"/>	other <i>(please specify)</i>	
Known Email for Service		

I believe that the facts stated in this certificate are true.

Full name	Manan Singh		
Signed		Position or office held	Partner
	(Claimant) ( <del>Defendant</del> ) ( <del>'s solicitor</del> ) ( <del>'s litigation friend</del> )		(If signing on behalf of firm or company)
Date	24/01/2025		

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules ([www.justice.gov.uk](http://www.justice.gov.uk)) and you should refer to the rules for information.

### **Calculation of deemed day of service of a claim**

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

### **Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)**

<b>Method of service</b>	<b>Deemed day of service</b>
First class post or other service which provides for delivery on the next business day	The second day after it was posted, left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Document exchange	The second day after it was left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Delivering the document to or leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day before 4.30pm, on that day; or in any other case, on the next business day after that day
Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted
Other electronic method	If the email or other electronic transmission is sent on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was sent
Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

### **Schedule 1**

1. Sealed Order of Murray J dated 21 March 2025
2. Sealed Application Notice dated 13 February 2025
3. Fourth Witness Statement of Manan Singh dated 13 February 2025
4. Exhibit MS4 dated 13 February 2025
5. Fifth Witness Statement of Manan Singh dated 18 March 2025
6. Exhibit MS5 dated 18 March 2025
7. Sealed Re-Amended Claim Form dated 24 March 2025

## **Schedule 2**

1. media@palestinecampaign.org - Email sent at:13:20
2. info@palestineaction.org - Email sent at:13:20
3. info@palestinecampaign.org - Email sent at:13:20
4. pscchelmsford@gmail.com - Email sent at: 13:20
5. pscshrop@gmail.com - Email sent at:13:21
6. lincolnpalestine@gmail.com - Email sent at:13:21
7. liverpoolfopal@gmail.com - Email sent at:13:21
8. palestinesolidaritybradford@gmail.com - Email sent at:13:21
9. branches@palestinecampaign.org - Email sent at:13:21
10. actions@palestineaction.org - Email sent at:13:21
11. bdfdfriendsofpalestine@yahoo.com - Email sent at:20:47

Certificate of service

Name of court High Court of Justice Kings Bench Division	Claim No. KB-2024-004175
Name of Claimant TELEDYNE UK LIMITED	
Name of Defendant JULIAN ALLEN GAO, RUBY HAMILL, DANIEL JONES, NAJAM SHAH, RICKY SOUTHALL, and Others	

On what day did you serve? 2 5 / 0 3 / 2 0 2 5

The date of service is 2 5 / 0 3 / 2 0 2 5

What documents did you serve?  
*Please attach copies of the documents you have not already filed with the court.*

Schedule 1

On whom did you serve?  
*(If appropriate include their position e.g. partner, director).*

Defendant 8 - Defendant 11

How did you serve the documents?  
*(please tick the appropriate box)*

☐ by first class post or other service which provides for delivery on the next business day

☐ by delivering to or leaving at a permitted place

☐ by personally handing it to or leaving it with  
(.....time left, where document is other than a claim form) *(please specify)*

☐ by other means permitted by the court *(please specify)*  
On Claimant injunction website in accordance with para 3 of the Order of Murray J dated 21/03/2025.

☐ by Document Exchange

☐ by fax machine (.....time sent, where document is other than a claim form) *(you may want to enclose a copy of the transmission sheet)*

☐ by other electronic means (.....time sent, where document is other than a claim form) *(please specify)*

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

Being the ☐ claimant's ☐ defendant's ☐ solicitor's ☐ litigation friend

☐ usual residence

☐ last known residence

☐ place of business

☐ principal place of business

☐ last known place of business

☐ last known principal place of business

☐ principal office of the partnership


☐ principal office of the corporation

☐ principal office of the company

☐ place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim

☐ other *(please specify)*

I believe that the facts stated in this certificate are true.

Full name	Manan Singh		
Signed		Position or office held	Partner
	(Claimant) ( <del>Defendant</del> ) ( <del>'s</del> solicitor) ( <del>'s</del> litigation friend)		(If signing on behalf of firm or company)
Date	2 6 / 0 3 / 2 0 2 5		

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules ([www.justice.gov.uk](http://www.justice.gov.uk)) and you should refer to the rules for information.

### **Calculation of deemed day of service of a claim**

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

### **Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)**

<b>Method of service</b>	<b>Deemed day of service</b>
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Document exchange	The second day after it was left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Delivering the document to or leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day before 4.30pm, on that day; or in any other case, on the next business day after that day
Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted
Other electronic method	If the email or other electronic transmission is sent on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was sent
Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

### **Schedule 1**

01. Sealed Order of Murray J dated 21 March 2025
02. Sealed Application Notice dated 13 February 2025
03. Draft Order
04. Fourth Witness Statement of Manan Singh dated 13 February 2025
05. Exhibit MS4 dated 13 February 2025
06. Fifth Witness Statement of Manan Singh dated 18 March 2025
07. Exhibit MS5 dated 18 March 2025
08. Sealed Amended Claim Form dated 27 January 2025
09. Sealed Re-Amended Claim Form dated 24 March 2025

Certificate of service

Name of court High Court of Justice Kings Bench Division	Claim No. KB-2024-004175
Name of Claimant TELEDYNE UK LIMITED	
Name of Defendant JULIAN ALLEN GAO, RUBY HAMILL, DANIEL JONES, NAJAM SHAH, RICKY SOUTHALL, and Others	

On what day did you serve?	27/05/2025
The date of service is	27/05/2025

What documents did you serve? <i>Please attach copies of the documents you have not already filed with the court.</i>	See Schedule 1
On whom did you serve? <i>(If appropriate include their position e.g. partner, director).</i>	See Schedule 2

How did you serve the documents?  
*(please tick the appropriate box)*

☒ by first class post or other service which provides for delivery on the next business day

☐ by delivering to or leaving at a permitted place

☐ by personally handing it to or leaving it with  
(.....time left, where document is other than a claim form) *(please specify)*

☐ by other means permitted by the court  
*(please specify)*

☐ by Document Exchange

☐ by fax machine (.....time sent, where document is other than a claim form) *(you may want to enclose a copy of the transmission sheet)*

☐ by other electronic means (.....time sent, where document is other than a claim form) *(please specify)*

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

See Schedule 2 Attached

Being the	<input type="checkbox"/> claimant's	<input checked="" type="checkbox"/> defendant's
	<input type="checkbox"/> solicitor's	<input type="checkbox"/> litigation friend

☒ usual residence

☒ last known residence

☐ place of business

☐ principal place of business

☐ last known place of business

☐ last known principal place of business

☐ principal office of the partnership


☐ principal office of the corporation

☐ principal office of the company

☐ place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim

☐ other *(please specify)*

I believe that the facts stated in this certificate are true.

Full name	Manan Singh		
Signed		Position or office held	Partner
(Claimant) ( <del>Defendant</del> ) ( <del>'s solicitor</del> ) ( <del>'s litigation friend</del> )		(If signing on behalf of firm or company)	
Date	28/05/2025		

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules ([www.justice.gov.uk](http://www.justice.gov.uk)) and you should refer to the rules for information.

### **Calculation of deemed day of service of a claim**

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**Schedule 1**

1. Fourth Witness Statement of Nicholas James Wargent
2. Exhibit NJW4
3. First Witness Statement of Scott Douglas Patterson
4. Exhibit SDP1
5. Fifth Witness Statement of Manan Singh
6. Exhibit MS5

## **Schedule 2**

- D1. JULIAN ALLEN GAO of 11 Ellesmere Place, Walton-on-Thames, Surrey KT12 5AE
- D2. RUBY HAMILL of 14A Emu Road, Wandsworth, London SW8 3PR
- D3. DANIEL JONES of 2 Rossett Road, Crosby, Sefton L23 3AW
- D4. NAJAM SHAH of 24 Cliffe Gardens, Shipley, Bradford BD18 3DB
- D5. RICKY SOUTHALL of 3 Clarendon Street, Wakefield, West Yorkshire WF1 3RQ
- D6. AMAREEN AFZAL of 11 North Hill Road, Flat F, Headingley, Leeds, West Yorkshire LS6 2EN
- D7. SERENA FENTON of 19 Foxcroft Green, Headingley, Leeds, West Yorkshire LS6 3NR
- D14. AUTUMN TAYLOR-WARD of 88 Allington Street, Liverpool, Merseyside L17 7AF
- D16. LARA DOWNES of 49 Gipsy Hill, Flat 3, London SE19 1QH
- D17. GABRIELLE MIDDLETON of 21 Athelstan Road, Margate, Kent CT9 2BD

Certificate of service

Name of court High Court of Justice Kings Bench Division	Claim No. KB-2024-004175
Name of Claimant TELEDYNE UK LIMITED	
Name of Defendant JULIAN ALLEN GAO, RUBY HAMILL, DANIEL JONES, NAJAM SHAH, RICKY SOUTHALL, and Others	

On what day did you serve? 27/05/2025

The date of service is 27/05/2025

What documents did you serve?  
*Please attach copies of the documents you have not already filed with the court.*

See Schedule 1

On whom did you serve?  
*(If appropriate include their position e.g. partner, director).*

See Schedule 2

How did you serve the documents?  
*(please tick the appropriate box)*

☒ by first class post or other service which provides for delivery on the next business day

☐ by delivering to or leaving at a permitted place

☐ by personally handing it to or leaving it with  
(.....time left, where document is other than a claim form) *(please specify)*

☐ by other means permitted by the court  
*(please specify)*

☐ by Document Exchange

☐ by fax machine (.....time sent, where document is other than a claim form) *(you may want to enclose a copy of the transmission sheet)*

☐ by other electronic means (.....time sent, where document is other than a claim form) *(please specify)*

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

See Schedule 2 Attached

Being the

☐ claimant's

☒ defendant's

☐ solicitor's

☐ litigation friend

☒ usual residence

☒ last known residence

☐ place of business

☐ principal place of business

☐ last known place of business

☐ last known principal place of business

☐ principal office of the partnership

☐ principal office of the corporation

☐ principal office of the company

☐ place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim

☐ other *(please specify)*

I believe that the facts stated in this certificate are true.

Full name

Manan Singh

Signed

M Singh

(Claimant) (~~Defendant~~) (~~'s solicitor~~) (~~'s litigation friend~~)

Position or office held

Partner

(If signing on behalf of firm or company)

Date

28/05/2025

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules ([www.justice.gov.uk](http://www.justice.gov.uk)) and you should refer to the rules for information.

### **Calculation of deemed day of service of a claim**

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Other electronic method	If the email or other electronic transmission is sent on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was sent
Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

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**Schedule 1**

1. Fourth Witness Statement of Nicholas James Wargent
2. Exhibit NJW4
3. First Witness Statement of Scott Douglas Patterson
4. Exhibit SDP1
5. Fifth Witness Statement of Manan Singh
6. Exhibit MS5

**Schedule 2**

D19. MARY ENSELL of 24 Aylton Road, Huyton, Merseyside L36 2LU

D20. HARRY WADE of Beaumont, 178 Leverington Road, Wisbech, Cambridgeshire PE13 1RU

Certificate of service

Name of court High Court of Justice Kings Bench Division	Claim No. KB-2024-004175
Name of Claimant TELEDYNE UK LIMITED	
Name of Defendant JULIAN ALLEN GAO, RUBY HAMILL, DANIEL JONES, NAJAM SHAH, RICKY SOUTHALL, and Others	

On what day did you serve? 27/05/2025

The date of service is 27/05/2025

What documents did you serve?  
*Please attach copies of the documents you have not already filed with the court.*

See Schedule 1

On whom did you serve?  
*(If appropriate include their position e.g. partner, director).*

Defendant 19 and Defendant 20

How did you serve the documents?  
*(please tick the appropriate box)*

☒ by first class post or other service which provides for delivery on the next business day

☐ by delivering to or leaving at a permitted place

☐ by personally handing it to or leaving it with (.....time left, where document is other than a claim form) *(please specify)*

☒ by other means permitted by the court *(please specify)*

In accordance with para 3 of the Order of Murray J dated 21/03/2025.

☐ by Document Exchange

☐ by fax machine (.....time sent, where document is other than a claim form) *(you may want to enclose a copy of the transmission sheet)*

☐ by other electronic means (.....time sent, where document is other than a claim form) *(please specify)*

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

Robert Lizar Solicitors  
101 Princess Road, Manchester  
M14 4RB

Being the ☐ claimant's ☒ defendant's

☒ solicitor's ☐ litigation friend

☐ usual residence

☐ last known residence

☒ place of business

☒ principal place of business

☐ last known place of business

☐ last known principal place of business

☐ principal office of the partnership

☐ principal office of the corporation


☐ principal office of the company

☐ place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim

☐ other *(please specify)*

I believe that the facts stated in this certificate are true.

Full name Manan Singh

Signed  \_\_\_\_\_

(Claimant) (~~Defendant~~) (~~'s solicitor~~) (~~'s litigation friend~~)

Position or office held Partner

(If signing on behalf of firm or company)

Date 28/05/2025

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules ([www.justice.gov.uk](http://www.justice.gov.uk)) and you should refer to the rules for information.

### **Calculation of deemed day of service of a claim**

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1. Fourth Witness Statement of Nicholas James Wargent
2. Exhibit NJW4
3. First Witness Statement of Scott Douglas Patterson
4. Exhibit SDP1
5. Fifth Witness Statement of Manan Singh
6. Exhibit MS5

Certificate of service

Name of court High Court of Justice Kings Bench Division	Claim No. KB-2024-004175
Name of Claimant TELEDYNE UK LIMITED	
Name of Defendant JULIAN ALLEN GAO, RUBY HAMILL, DANIEL JONES, NAJAM SHAH, RICKY SOUTHALL, and Others	

On what day did you serve? 28/05/2025

The date of service is 28/05/2025

What documents did you serve?  
Please attach copies of the documents you have not already filed with the court.

See Schedule 1

On whom did you serve?  
(If appropriate include their position e.g. partner, director).

Defendant 8 - Defendant 11

How did you serve the documents?  
(please tick the appropriate box)

☐ by first class post or other service which provides for delivery on the next business day

☐ by delivering to or leaving at a permitted place

☐ by personally handing it to or leaving it with (.....time left, where document is other than a claim form) (please specify)

☒ by other means permitted by the court (please specify)

Email times at Schedule 2 and website, in accordance with para 3 of the Order of Tipples J dated 24/01/2025.

☐ by Document Exchange

☐ by fax machine (.....time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet)

☒ by other electronic means (Sch 2.....time sent, where document is other than a claim form) (please specify)

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

See Schedule 2 Attached

Being the ☐ claimant's ☒ defendant's

☐ solicitor's ☐ litigation friend

☐ usual residence

☐ last known residence

☐ place of business

☐ principal place of business

☐ last known place of business

☐ last known principal place of business

☐ principal office of the partnership

☐ principal office of the corporation

☐ principal office of the company

☐ place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim

☒ other (please specify)

Known Email for Service

I believe that the facts stated in this certificate are true.

Full name Manan Singh

Signed M Singh

(Claimant) (Defendant) ('s solicitor) ('s litigation friend)

Position or office held Partner

(If signing on behalf of firm or company)

Date 28/05/2025

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules ([www.justice.gov.uk](http://www.justice.gov.uk)) and you should refer to the rules for information.

### **Calculation of deemed day of service of a claim**

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<b>Method of service</b>	<b>Deemed day of service</b>
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Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted
Other electronic method	If the email or other electronic transmission is sent on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was sent
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**Schedule 1**

1. Fourth Witness Statement of Nicholas James Wargent
2. Exhibit NJW4
3. First Witness Statement of Scott Douglas Patterson
4. Exhibit SDP1
5. Fifth Witness Statement of Manan Singh
6. Exhibit MS5

## **Schedule 2**

1. media@palestinecampaign.org - Email sent at: 11:10
2. info@palestineaction.org - Email sent at:11:11
3. info@palestinecampaign.org - Email sent at:11:11
4. pscchelmsford@gmail.com - Email sent at: 11:14
5. pscshrop@gmail.com - Email sent at:11:18
6. lincolnpalestine@gmail.com - Email sent at:11:18
7. liverpoolfopal@gmail.com - Email sent at:11:18
8. palestinesolidaritybradford@gmail.com - Email sent at:11:21
9. branches@palestinecampaign.org - Email sent at:11:21
10. actions@palestineaction.org - Email sent at:11:21
11. bdfdfriendsofpalestine@yahoo.com - Email sent at:11:22

Certificate of service

Name of court High Court of Justice Kings Bench Division	Claim No. KB-2024-004175
Name of Claimant TELEDYNE UK LIMITED	
Name of Defendant JULIAN ALLEN GAO, RUBY HAMILL, DANIEL JONES, NAJAM SHAH, RICKY SOUTHALL, and Others	

On what day did you serve? 28/05/2025

The date of service is 28/05/2025

What documents did you serve?  
*Please attach copies of the documents you have not already filed with the court.*

See Schedule 1

On whom did you serve?  
*(If appropriate include their position e.g. partner, director).*

Defendant 8 - Defendant 11

How did you serve the documents?  
*(please tick the appropriate box)*

☐ by first class post or other service which provides for delivery on the next business day

☐ by delivering to or leaving at a permitted place

☐ by personally handing it to or leaving it with (.....time left, where document is other than a claim form) *(please specify)*

☒ by other means permitted by the court *(please specify)*

On Claimant injunction website in accordance with para 3 of the Order of Tipples J dated 24/01/2025.

☐ by Document Exchange

☐ by fax machine (.....time sent, where document is other than a claim form) *(you may want to enclose a copy of the transmission sheet)*

☐ by other electronic means (.....time sent, where document is other than a claim form) *(please specify)*

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

Being the ☐ claimant's ☐ defendant's

☐ solicitor's ☐ litigation friend

☐ usual residence

☐ last known residence

☐ place of business

☐ principal place of business

☐ last known place of business

☐ last known principal place of business

☐ principal office of the partnership

☐ principal office of the corporation

☐ principal office of the company

☐ place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim

☐ other *(please specify)*

I believe that the facts stated in this certificate are true.

Full name Manan Singh

Signed *M Singh* Position or office held Partner

(Claimant) (Defendant) ('s solicitor) ('s litigation friend) (If signing on behalf of firm or company)

Date 28/05/2025

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules ([www.justice.gov.uk](http://www.justice.gov.uk)) and you should refer to the rules for information.

### **Calculation of deemed day of service of a claim**

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

### **Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)**

<b>Method of service</b>	<b>Deemed day of service</b>
First class post or other service which provides for delivery on the next business day	The second day after it was posted, left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Document exchange	The second day after it was left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Delivering the document to or leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day before 4.30pm, on that day; or in any other case, on the next business day after that day
Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted
Other electronic method	If the email or other electronic transmission is sent on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was sent
Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

**Schedule 1**

1. Fourth Witness Statement of Nicholas James Wargent
2. Exhibit NJW4
3. First Witness Statement of Scott Douglas Patterson
4. Exhibit SDP1
5. Fifth Witness Statement of Manan Singh
6. Exhibit MS5