

**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

SEVENTH WITNESS STATEMENT OF MANAN SINGH

I, **Manan Singh**, of Keystone Law, 48 Chancery Lane, London WC2A 1JF will say as follows—

1. I am a Partner at Keystone Law. Keystone Law represents the Claimant in these proceedings, Teledyne UK Limited (company no. 00432014). I am authorised to make this statement on behalf of the Claimant. The Claimant is a global leader in specialised components and subsystems for innovative solutions in medical, science, aerospace, defence and industrial applications. Specifically, the Claimant is known for its innovation in semi-conductors, high power RF, imaging and precision timing and engineered systems.
2. I make this witness statement in advance of the review of the injunction order granted against Persons Unknown, which is listed alongside the disposal of the Claim against the Named Defendants on 25 July 2025. I have already filed and served a witness statement to be relied upon at that hearing in accordance with the directions given in the Claim.
3. The facts and matters set out by me in this witness statement are either known by me directly and are true, or are known by me indirectly and are believed to the best of my knowledge to be true. In relation to matters falling into the latter category, I have set out the source of my knowledge and belief.
4. I exhibit to this witness statement a bundle of documents marked **MS7**. All references to that exhibit are in the format **MS7/page number**.

My 'fifth' witness statement dated 27 May 2025

5. My witness statement dated 27 May 2025, which was filed and served in accordance with the directions in this Claim and is to be relied upon at trial, is mislabelled. It should have been labelled as my sixth witness statement, and not my fifth witness statement. I apologise for any confusion caused.
6. My fifth witness statement is in fact dated 18 March 2025, and was made in support of the Application to add D19 and D20 to these proceedings.

The purpose of this witness statement

7. The Claimant has already filed and served its further evidence for use at the hearing on 25 July 2025, in accordance with the Orders of Tipples J and Murray J. However, by the time of the hearing, that evidence will be nearly two months out of date.
8. The Claimant seeks permission to rely on this witness statement, which contains information relevant to Persons Unknown only. Significant events have occurred since the filing and serving of the Claimant's evidence in May 2025, of which the Court should be made aware. The Claimant does not seek to introduce any additional evidence in relation to the Named Defendants specifically (save for one small update at paragraph 59 below).
9. The intention and purpose of this witness statement is to assist the court and give the court an up-to-date picture of the activity of Palestine Action, who were particularly active following the filing and serving of the Claimant's evidence, and to comply with the Claimant's duty of full and frank disclosure.
10. This statement covers:
 - i. direct-action documented on the Palestine Action website since 27 May 2025;
 - ii. direct-action documented on Palestine Action's social media since 27 May 2025;
 - iii. the RAF Brize Norton attack on 20 June 2025;
 - iv. UK Government reaction and proscription of Palestine Action;
 - v. reaction of other direct-action groups to the proscription;

- vi. events since the proscription;
- vii. continued apprehension of future protests; and
- viii. miscellaneous additional information.

Website and social media content

11. Following the proscription of Palestine Action, the group's website and social media accounts were removed from the internet on the evening of 4 July 2025. All of the Palestine Action website content and social media content referred to in this witness statement and exhibited in MS7 was captured prior to its removal.

Palestine Action: direct-action documented on its website since 27 May 2025

12. Since 27 May 2025, the following actions were documented on the 'News' page of the Palestine Action website.

- i. On 29 May 2025, Palestine Action published an article detailing that its activists had targeted the landlords of the London-based 'Discovery Park' business park, in which an Elbit site is situated. The registered address of Discovery Park Ltd was heavily vandalised. A picture accompanying the article shows a ground floor commercial premises with the glass frontage shattered and smashed (such that it is now open to the street), and red paint sprayed over the front of the building. I exhibit a copy of the article at **MS7/1 – 2**;
- ii. On 1 June 2025, Palestine Action published an article detailing that its activists had targeted the offices of CDW in Peterborough. CDW is a supplier to Elbit. The article explains that the glass panels at the front of the building were cracked and covered in red paint, and the picture accompanying the article shows the same. The article also reminds readers that CDW's offices in London, Manchester and Peterborough had previously been targeted, and that the action "*comes as part of Palestine Action's continued commitment to targeting supply chains used by Elbit Systems*". I exhibit a copy of the article at **MS7/3 – 4**;

- iii. On 14 June 2025, Palestine Action published an article detailing that its activists had cut through fences and broken into a facility operated by Permoid Industries, near Durham. The group alleges that its activists destroyed machinery and weaponry, and removed private documents. I exhibit a copy of the article at **MS7/5 – 6**;
 - iv. On 16 June 2025, Palestine Action published an article detailing that its activists had returned to Permoid Industries' facility in Durham, and occupied the roof ahead of an alleged planned shipment of ammunition boxes to Israel. The group alleges that its activists put holes in and damaged the roof and the inside of the building, as well as unfurling banners from the roof. The picture accompanying the article shows three activists on the roof of the building, wearing red boiler suits. I exhibit a copy of the article at **MS7/7 – 8**.
13. Many of these actions were extensively documented on the group's social media (and especially the incident at Permoid Industries on 16 June, which was documented through multiple posts with videos and photos). In the interests of proportionality, I did not capture those posts.
14. To my knowledge, none of the entities or sites targeted in the above actions have the benefit of injunctive relief restraining acts of trespass (or any tort related to direct-action protest).

Palestine Action: direct-action documented on Instagram since 27 May 2025

15. Some of the recent actions undertaken by Palestine Action activists were not recorded on the group's website, and appeared only on the group's Instagram page. Examples of those actions include (but are not limited to) the following key actions in the UK (I have disregarded the international actions):
- i. On 9 June 2025, five posts were made to the Palestine Action Instagram account detailing an ongoing incident at the Bristol offices of Allianz. I exhibit the five posts at **MS7/9 – 14**. Each of the posts is accompanied by a video, so a still shot of each is exhibited alongside the caption accompanying the post, save for one post (the first post) which also includes a photograph, which I also exhibit. Taken together,

the posts show that approximately four activists attended Allianz's offices and blocked both the front and rear exits. A significant amount of spray paint has been applied to the building, and I note that fire extinguishers can be seen in the videos and photo (which, as has been explained in this Claim, are often re-purposed to spray paint). The activists appear to be using lock-on devices (in the form of suitcases) to assist their blocking of the entrances and exits to the building;

- ii. On 9 June 2025, a post was made to the Palestine Action Instagram account documenting that an activist was arrested whilst protesting outside the Foreign Office. I exhibit a still shot of the video posted alongside the caption accompanying the post at **MS7/15**;
- iii. On 10 June 2025 a post was made to the Palestine Action Instagram account documenting that the London HQ of Leonardo had again been targeted by its activists. The post is accompanied by eight photographs, which show red spray paint having been applied to the building, and a smashed window. I exhibit the post and photos at **MS7/16 – 23**;
- iv. On 12 June 2025 seven posts were made to the Palestine Action Instagram account detailing an ongoing incident at the London offices (Cannon Street) of Universal Defence and Security Solutions. I exhibit the seven posts at **MS7/24 – 30**. Each of the posts is accompanied by a video, so a still shot of each is exhibited alongside the caption accompanying the post. Taken together, the posts show that the activists climbed up the building and occupied the top of a canopy that covered the main entrance to the building. They unfurled banners, used red smoke flares and used loudhailers. The posts allege that the two activists also locked-on to each other, and the later two videos show specialist police officers having to climb up the building to retrieve the activists (who had to be winched down from the building on a stretcher, because they "*resist[ed] until the very last moment*");
- v. On 15 June 2025 a post was made to the Palestine Action Instagram account documenting that the Glasgow offices of JP Morgan has been targeted. The video accompanying the post shows that multiple windows on the glass front of the

building have been smashed. I exhibit at **MS7/31** a copy of the post and a still image from the video;

- vi. On 20 June 2025 a post was made to the Palestine Action Instagram account detailing that the group had targeted the Chelmsford Offices of Allianz. The post is accompanied by seven pictures, which shows the front of the building covered in red paint, and the windows smashed. I exhibit a copy of the post and images at **MS7/32 – 38**;
- vii. On 20 June 2025 a post was made to the Palestine Action Instagram account detailing that the group had targeted the Manchester Offices of Allianz. The post is accompanied by three pictures, which shows the front of the building covered in red paint, and the windows smashed. I exhibit a copy of the post and images at **MS7/39 – 41**;
- viii. On 20 June 2025 a post was made to the Palestine Action Instagram account detailing that the group had targeted the Manchester Offices of CDW. The post is accompanied by one image, which shows the front of the building covered in red paint. The attack appears to have been co-ordinated with the incident at RAF Brize Norton and the two attacks at Allianz, as the caption reads '*[t]oday, actionists also decommissioned two British military planes and targeted Elbit's insurers*'. I exhibit a copy of the post and image at **MS7/42**;
- ix. On 20 June 2025 a post was made to the Palestine Action Instagram account detailing that the group had targeted the engineering building and Vice Chancellor's office at the University of Liverpool. The post is accompanied by four pictures, which shows the front of the building covered in red paint. I exhibit a copy of the post and images at **MS7/43 – 46**;
- x. On 23 June 2025 a post was made to the Palestine Action Instagram account detailing that the group had targeted the London offices of Invesco. The post is accompanied by seven images, which show the front of the building splashed in red paint, and graffitied with phrases including 'Drop Elbit' and 'Viva Pal Action'. This incident occurred on the same day as a large demonstration in Trafalgar Square

(which I shall describe below). I exhibit a copy of the post and images at **MS7/47 – 53**;

- xi. On 1 July 2025, four posts were made to the Palestine Action Instagram account detailing that activists were blockading the entrance to an Elbit Systems facility in Bristol. Three of the post were accompanied by videos, with the fourth being accompanied by four photos (one of those photos appears to instead relate to the incident discussed in (xii) below). The posts show that activists had blocked the gates to a facility with a van and then locked onto the vehicle, that red paint had been sprayed around the area (with a fire extinguisher with ‘Palestine Action’ branding visible in the photos) and that red smoke flares were being used. Notably, the videos show one activist reciting *‘from the river to the sea, Palestine will be free’* whilst holding a red smoke flare. I exhibit at **MS7/54 – 60** the four posts, with a screen shot from each of the three videos and all four accompanying photos;
- xii. On 1 July 2025, four posts were made to the Palestine Action Instagram account detailing that activists were occupying the roof of ‘Guardtech’, which is alleged to be a supplier to Elbit Systems located in Suffolk. The photos and videos show that red spray paint was used on the building and roof, windows were smashed and banners unfurled (including one which read ‘work with Elbit... expect Palestine Action’). I exhibit at **MS7/61 – 71** the four posts, with a screen shot from each of the three videos and all eight accompanying photos.

16. In addition, Palestine Action shared the following content to its Instagram account (as apparent collaborator posts):

- i. on 5 June 2025, a post from a group known as ‘Youth Front for Palestine’ (collaborating also with ‘GM Friends of Palestine’, ‘Manchester Palestine Action’ and ‘Europe Palestine Network’), which shows a group protesting outside the Manchester offices of Allianz. I make no allegation that the video accompanying the post shows unlawful acts of protest. The post is a video, but I exhibit a still shot from that post with the accompanying caption at **MS7/72**;

- ii. On 5 June 2025, a post from a group known as ‘Youth Front for Palestine’ (collaborating also with ‘Europe Palestine Network’), which shows a group protesting outside the Birmingham offices of Allianz. The video accompanying the post appears to show the protestors having entered the reception area of the building, with staff at the building objecting to their presence. The post is a video, but I exhibit a still shot from that post with the accompanying caption at **MS7/73**;
- iii. on 23 June 2025, a post from ‘Youth Front for Palestine’ (collaborating also with ‘Eye on Palestine’, ‘Europe Palestine Network’ and ‘SouthStaffsPalestineSolidarity’). The post is accompanied by a video of a large group of masked protestors holding a banner, and appearing to blockade a premises. The caption accompanying the post explains that ‘[a]ctivists from around Britain are blockading the entrance to a UAV engines site in Shenstone, near Birmingham’. I exhibit a still shot from that post with the accompanying caption at **MS7/74**.

17. Again, to my knowledge, none of the entities or sites targeted in the above actions have the benefit of injunctive relief restraining acts of trespass (or any tort related to direct-action protest).

Attack on RAF Brize Norton

18. On 20 June 2025, two supporters of Palestine Action broke into the airfield at RAF Brize Norton and decommissioned two Airbus Voyager aircraft. The incident was widely covered in the national media, as well as on the Palestine Action website and social media. I exhibit at:

- i. **MS7/75 – 76** the article published on the Palestine Action website on 20 June 2025 covering the incident (<https://palestineaction.org/brize-norton/>);
- ii. **MS7/77** the post made to the Palestine Action Instagram account. The post was accompanied by a video, which I do not exhibit (no other videos being exhibited in this Claim to date);

- iii. **MS7/78 – 81** an article published on BBC News online on 20 June 2025 covering the incident (<https://www.bbc.co.uk/news/articles/cx24nppdx0lo>).

19. These sources report and contain images showing that two activists broke into the airfield under the cover of darkness and used electric scooters to reach the aircraft. Re-purposed fire extinguishers were then used to spray paint the aircraft in red paint, as well as spray red paint into the aircraft turbines. Palestine Action also claims that crowbars were used to damage the aircraft further. The two protestors entered the airbase, undertook the action and left the airbase undetected.

20. It has been reported in the national media and by Palestine Action that six people have been subsequently arrested in relation to this incident, with some being arrested in relation to alleged terrorism offences. I exhibit at:

- i. **MS7/82 – 84** a BBC News online article dated 27 June 2025, detailing that four people had been arrested (<https://www.bbc.co.uk/news/articles/cq6m79n6q65o>);
- ii. **MS7/85 – 90** an article from the ‘news’ section of the Palestine Action website, also dated 27 June 2025, detailing that four people had been arrested (<https://palestineaction.org/arrests-brize-norton/>);
- iii. **MS7/91 – 95** an article from Sky News online dated 28 June 2025, detailing that two further persons had been arrested.

UK Government reaction and proscription of Palestine Action

21. Unsurprisingly, there has been a significant reaction to the action undertaken at RAF Brize Norton. Almost immediately, on 20 June 2025, the UK Government announced that it was considering adding Palestine Action to the list of ‘proscribed terrorist groups or organisations’ pursuant to the Terrorism Act 2000. On 23 June 2025, the Home Secretary formally announced in Parliament that a draft proscription order would be put before Parliament the following week.

22. On 30 June 2025, the draft proscription order was published (**MS7/96 – 97**; <https://www.legislation.gov.uk/ukdsi/2025/9780348273373>). Both the House of Commons and the House of Lords voted in favour of the proscription. The proscription was scheduled to come into force at 00:00 on 5 July 2025.
23. On 4 July 2025, a co-founder of Palestine Action (Huda Ammori) sought interim relief in judicial review proceedings to prevent the proscription coming into force. I understand that Chamberlain J refused relief, and produced a written judgment at 5.30pm ([2025] EWHC 1708 (Admin)). Ms Ammori sought permission to appeal from the Court of Appeal at an oral hearing, which was refused at 10.25pm in a written judgment ([2025] EWCA Civ 848). The proscription came into force at 00:00 on 5 July 2025, as scheduled.
24. I understand from the Order available online and dated 1 July 2025 (<https://www.judiciary.uk/judgments/huda-ammori-v-secretary-of-state-for-the-home-department-order/>) that the judicial review permission hearing is to be listed in the week commencing 21 July 2025 (ie. the same week as the hearing in these proceedings). I exhibit a copy of the Order at **MS7/98 – 100**. The court list released on 18 July 2025 confirms that the permission hearing is listed for 21 July 2025 at 10.30am before Chamberlain J.
25. My understanding of proscription under the Terrorism Act 2000 is that it is an offence to belong to or profess to belong to a proscribed organisation, supports a proscribed organisation or wears or published images of the ‘uniform’ of a proscribed organisation. These offences are described more specifically in ss11-13 of the Terrorism Act 2000.
26. The penalty for the offences varies, with a maximum of 14 years imprisonment being set for membership of a proscribed organisation.

Reaction from Palestine Action

27. On 24 June 2025, Palestine Action released a statement in response to the Home Secretary’s announcement in Parliament. That statement can be found at **MS7/101 – 102**, which is an Instagram post to the Palestine Action account, with the statement contained on two images of text.

28. Later that same day, Palestine Action publicised on its Instagram page a crowd funding campaign, to fund a legal challenge to the proscription. I exhibit a copy of the post at **MS7/103**. The crowd funding page can be found here: <https://www.crowdjustice.com/case/palestine-action/> (exhibited at **MS7/104 – 105**). Initially, a 7 day target of £100,000 was set, but this was quickly exceeded and the campaign was extended both in time and target (which was recalibrated to £300,000). As of 7 July 2025, the crowdfund was showing as ‘funded’, at a total of £300,636. I exhibit a copy of the page at **MS7/106**.
29. After the Home Secretary’s announcement on 23 June 2025, Palestine Action appeared to double-down on its intention to continue recruiting new activists and undertake unlawful direct-action protest. I exhibit at **MS7/107 – 116** an article published by the Telegraph online on 26 June 2025. A reporter appears to have attended an online direct-action workshop, in which the intended targets of direct-action were discussed, as well as advice given on how to participate in and organise such actions. Much of the content of the article reflects that which was published in the Underground Manual, and refers to the formation of cells, and how to avoid detection when undertaking actions. Notably, the article alleges that the activist delivering the training said that Palestine Action would continue to operate, even if designated as a terror group.

Reaction of direct-action groups to the proscription

Social media campaign

30. Upon the UK Government announcing that it was considering adding Palestine Action to the list of proscribed organisations, a social media campaign was launched with the tag-line ‘we are all Palestine Action’. Multiple posts were made to the Palestine Action Instagram page, most of which were collaborator posts from other organisations, declaring support for and solidarity with Palestine Action. A news article on the Palestine Action website also recorded the spread of the ‘we are all Palestine Action’ campaign across social media (<https://palestineaction.org/we-are-all-palestine-action/>), exhibited at **MS7/117 – 119**.

31. I exhibit below a few examples of those posts. There were simply too many to exhibit the full suite:

- i. On 20 June 2025, a collaborator post from 'Eye on Palestine', 'Eye on Palestine Backup Account' and 'Sana Aljamal'. The post explains that the Home Secretary was considering proscribing Palestine Action and declares (in part) '*[w]e must not be silent, raise your voice in support of Palestine Action and their critical work in direct action in support of the Palestinian people*'. The accompanying image is of Palestine Action activists holding a banner and smoke flares. I exhibit the post and image at **MS7/120**;
- ii. On 20 June 2025, a collaborator post from 'XR for Palestine' and 'Defend Our Juries'. The caption declares (in part) '*WE ARE ALL PALESTINE ACTION. The use of anti-terror laws to silence those opposed to gen0c'de MUST STOP!*'. I exhibit the post and accompanying image (which is overlayed with text reading '*WE ARE ALL PALESTINE ACTION*') at **MS7/121**;
- iii. On 20 June 2025, a collaborator post from 'Youth Demand', 'Just Stop Oil', 'Free the Filton 18' and 'Defend Our Juries'. The caption to the post reads the same as the abovementioned post, but the image is different. I exhibit the post and accompanying image (which is overlayed with text reading '*WE ARE ALL PALESTINE ACTION*') at **MS7/122**;
- iv. On 20 June 2025, a collaborator post from 'Parents for Palestine'. The caption to the post reads (in part) '*we are all Palestine Action*'. The caption also advertises a demonstration 'tomorrow' in Whitehall. The post is accompanied by two images which contain the words '*WE ARE ALL PALESTINE ACTION*'. I exhibit the post and images at **MS7/123 – 124**;
- v. On 21 June 2025, a collaborator post from 'The Preston People's Collective', 'Chorley4Palestine' and 'Blackburn4Palestine'. The post is accompanied by three images of text which contain a 'statement of solidarity'. The caption to the post reads (in part) '*[i]f they want to ban us, they ban us all. We are all Palestine Action*'. I exhibit the post and images at **MS7/125 – 127**;

- vi. on 21 June 2025, a collaborator post from ‘Just Stop Oil’ and ‘Youth demand’. The post is accompanied by two images containing a text statement, with one simply reading ‘*WE ARE ALL PALESTINE ACTION*’, the other includes the statement ‘*[w]e stand with Palestine Action*’. I exhibit the post and images at **MS7/128 – 129**;
 - vii. on 21 June 2025, a collaborator post from ‘Craving Palestine’ and ‘Europe Palestine Network’. The caption simply reads ‘*[w]e are all @pal_action!*’. The accompanying image is of two Palestine Action activists, with the same text overlayed. I exhibit the post and image at **MS7/130**;
 - viii. on 21 June 2025, a collaborator post from ‘Sisters Uncut’. The post contains an image with the text ‘*WE ARE ALL PALESTINE ACTION*’. The caption repeats that wording and also states ‘*[w]e must not be silent. Support Palestine Action and their critical work in direct action in support of the Palestinian people*’. I exhibit the post and image at **MS7/131**;
 - ix. on 21 June 2025, a collaborator post from ‘Vocal Politics’ and ‘Europe Palestine Network’. The accompanying image is a statement (apparently from Vocal Politics) which reads, in part ‘*[w]e stand in full solidarity with Palestine Action. Any measure against its members is a measure against all who defend humanity, both in Palestine and across the UK*’. I exhibit the post and image at **MS7/132**;
 - x. on 21 June 2025, a collaborator post from ‘Europe Palestine Network’ and ‘Leicester Action for Palestine’. The caption to the post reads (in part) ‘*Leicester Action for Palestine stand with @pal_action and condemn the UK home secretary’s call to proscribe them as a terrorist organisation*’. The post is accompanied by two images of home-made bus-stop advertising boards. I exhibit the post and images at **MS7/133 – 134**.
32. Other collaborator posts with a general pro-Palestinian, or anti-proscription, sentiment were made to the Palestine Instagram account following the proscription announcement. There are simply too many to exhibit here.

33. Further, on 1 July 2025, a collaborator post was also made to Palestine Action's Instagram account (collaborating with 'PYM Britain', 'Youth Front for Palestine' and Palestinian Youth Movement') which alleged that over 100 grassroots organisations stood in solidarity with Palestine Action. The caption accompanying the post also called for the mobilisation of activists to protest on 2 and 4 July outside the House of Commons and Royal Courts of Justice respectively. I exhibit a copy of the post at **MS7/135 – 142**.

34. New and splinter groups are also likely to be formed following the proscription. For example:

- i. on 28 June 2025 a collaborator post was made to the Palestine Action Instagram account by what appeared to be a newly formed group called 'Yvette Cooper'. The video accompanying the post shows a masked activist smashing a window of a building and spray painting a wall with red paint, including with the words 'DROP ELBIT'. The caption to the post reads:

BREAKING: Inspired by Palestine Action, new direct action group 'Yvette Cooper' takes action against BNY Mellon's investment firm, shareholders in Israel's biggest weapons producer.

Yvette Cooper may try to ban Palestine Action, but will she ban herself?

I exhibit a copy of the post and a still shot of the accompanying video at **MS7/143**. Further, at **MS7/144** I exhibit a screen shot of the Yvette Cooper group Instagram page. Beneath the profile picture, Instagram have added a 'new' tag. The profile picture resembles the Palestine Action logo. The group had also made only one post (the aforementioned collaborator post), and already gained nearly 4,800 followers;

- ii. on 3 July 2025 the Yvette Cooper group made a further collaborator post to the Palestine Action Instagram account, accompanied by a video showing activists spraying red paint at and damaging an HGV lorry. The caption accompanying the post reads:

BREAKING: Newly launched direct action group 'Yvette Cooper' targets Time Logistics, who transport weaponry for Israel's biggest weapons firm.

If you want to ban Palestine Action, you'll have to proscribe Yvette Cooper too.

I exhibit a copy of the post and a still shot of the accompanying video at **MS7/145**. The clear inference from the caption is that Palestine Action activists will continue to undertake direct action even after Palestine Action is proscribed, but will do so under the banner of 'Yvette Cooper'.

35. Since the proscription of Palestine Action came into force, the 'Yvette Cooper' page appears to have been removed from Instagram.

On the ground protest

36. Palestine Action's social media was used to co-ordinate a protest in Trafalgar Square on Monday 23 June 2025. I understand from the national news media, and Palestine Action's Instagram account, that the protest had originally been planned to take place in Westminster, but that the police enforced an exclusion zone, causing the venue of the protest to be changed. By way of example, I exhibit at:

- i. **MS7/146** an Instagram post from the Palestine Action account (which is a collaborator post with 'PYM Britain', 'Europe Palestine Network' and 'Eye on Palestine', posted early on 23 June 2025. The post advises of the change of location, the start time of the protest and calls for supporters to 'mobilise';
- ii. **MS7/147 – 148** a pinned Instagram post from the Palestine Action account, which was later updated to reflect the new venue. The post was originally made on 21 June 2025, and is a collaborator post with 'PYM Britain', 'Europe Palestine Network' and Youth Front for Palestine'. The images accompanying the post carry the details of the original venue (the Houses of Parliament), with a second image also appearing to carry the names and logos of various supporting organisations;
- iii. **MS7/149 – 151** a BBC News online article covering the protest in Trafalgar Square.

37. On 24 June 2025, a collaborator post also appeared on the Palestine Action Instagram account from ‘CAGE International’ (collaborating also with ‘Europe Palestine Network’ and ‘Palestine lobby’). The caption of the post is titled ‘*YOU CAN STILL SUPPORT PALESTINE ACTION!!*’ and goes on to explain ‘*IT IS STILL LEGAL to support, join and partake in the activities of Palestine Action*’. The post is accompanied by six images with overlaid text, ‘explaining’ the proscription announcement. The fourth image includes the text ‘[y]ou can still join Palestine Action and take direct action with them today’. The fifth image also states that, if proscription does happen, ‘*the work must continue to stop the genocide in Gaza and that will still include direct action methods*’. I exhibit a copy of the post and six images at **MS7/152 – 157**.

38. Palestine Action’s social media documented that there were many protests expressing solidarity with the group across the country since 20 June 2025. There are simply too many posts for me to exhibit, and I hope that I have been able to give the court an insight into the landscape and development of events. Palestine Action also continued to co-ordinate protests, and published a ‘timetable’ on its website on 1 July 2025, exhibited at **MS7/158 – 160**, which advertised a protest at the House of Commons at 6pm on 2 July (when the draft proscription order was due to be debated), and outside the Royal Courts of Justice at 10.30am on 4 July, when the group’s application for interim relief was to be heard. Notably, the group again appears to double down on the effect of the proscription, and advertises an online meeting at 7pm on 4 July to discuss next steps, just ahead of when the proscription is due to come into force.

‘To Kill a War Machine’

39. A documentary titled ‘To Kill a War Machine’, and produced by the ‘Rainbow Collective’, which documents the direct-action of Palestine Action from 2020 onwards (and which includes footage captured by activists during their actions) was due to be released in the summer of 2025. However, following the proscription announcement, the release of the documentary was fast-tracked and was made available to stream online (for a fee of £10.50), and was streamed at venues across the country prior to the proscription. I exhibit a copy of the relevant webpage at **MS7/161 – 174** (<https://tokillawarmachine.com>).

Events since the proscription

40. As set out above, a protest was organised to take place outside the Royal Courts of Justice on 4 July 2025, that being the day on which Ms Ammori's application for interim relief was heard. I exhibit at **MS7/175 – 182** a post that appeared on the Palestine Action Instagram page on the early evening of 4 July 2025, documenting the protest (which appears to have been large, and attracted a large police presence). As can be seen from the post, the group had already begun to wind down its social media, and had rebranded to 'resisttheban'. I also exhibit at **MS7/183** copy of the account page and bio, which shows that the group had started to rebrand as 'resisttheban'.
41. Later that same evening, the group re-braded further prior to the proscription taking effect. I exhibit at **MS7/184** a screen shot of the account page and bio taken at 22:59, which shows that the Palestine Action logo had been replaced with a Palestinian flag, and the bio changed to read '[a]ccount transferred to non-British Citizens outside of Britain, for other use'. That page has since disappeared from Instagram altogether.
42. I also exhibit at **MS7/185 – 186** a screen shot of a post made to the resisttheban Instagram page, which was posted at around 10pm. The post is a statement from Palestine Action, and continues to encourage direct-action. Specifically, the statement says *inter alia*: '[t]hey may be able to proscribe 'Palestine Action', but they cannot stop direct action happening across the country in different forms'; '[t]hey cannot proscribe the TACTIC of direct action'; 'we are pleased to see many who are adamant on resisting the ban through a campaign of civil disobedience'; '[w]ilst we encourage and support a campaign of civil disobedience, all who take part must do so on an informed basis'; 'with repression always comes more resistance. This is a moment that the British state will likely come to regret. It's a signal to all of us who are willing to resist, to make the ban unenforceable'; '[w]e must resist for our own rights and most importantly, for the Palestinian people facing a genocide'; 'COLLECTIVELY. WE WILL RESIST AND ULTIMATELY. WE WILL WIN'.
43. Despite the proscription, activists have continued to protest under the banner of, and in support of and solidarity with, Palestine Action. On 5 July 2025, Sky News online reported that 29 protestors had been arrested in Parliament Square on suspicion of committing offences under the Terrorism Act 2000, as they had been protesting in support of Palestine

Action (<https://news.sky.com/story/police-arrest-protesters-supporting-palestine-action-after-group-designated-as-terrorist-organisation-13392763>). I exhibit a copy of the article at **MS7/187 – 195**.

44. The group known as ‘Defend our Juries’, to which I have already referred in this witness statement, has been especially active in the resistance to the proscription. Of the many social media posts that it has made, I exhibit at **MS7/196 – 213** an example of two that were posted on 5 July 2025 and which document the arrests made in Parliament Square. Eighteen images accompany the two posts. The group also uploaded a press release regarding the incident to its website, which I exhibit at **MS7/214 – 215**. Notably, the press release concludes with the statement ‘[f]urther such actions are expected to follow shortly’.
45. On 8 July 2025, Defend our Juries also posted to its Instagram account a report that two arrests took place at a Bradford Friends of Palestine event (which is the group that had taken to obstructing access to the Shipley Site prior to the grant of injunctive relief). The two activists were arrested for holding a “we are all Palestine Action” sign. The post also reports that 111 arrests had taken place since the proscription, although no source for that number is provided. I exhibit a copy of the post and three images at **MS7/216 – 218**. The post also reads ‘[t]he snowball is beginning to roll. Are Labour ready for the avalanche?’.
46. On 12 July 2025, Defend our Juries made nine posts to its Instagram account (some of which were collaborator posts) documenting that protests were taking place in London, Cardiff and Manchester, as a result of which multiple arrests were made in each location. Eight of the posts were accompanied by multiple photos, with one accompanied by a video. The protests appear to take the form of protestors gathering and sitting at prominent locations (BBC Cymru HQ, Parliament Square and the Emmeline Pankhurst statue (St Peter’s Square) in Manchester) holding signs reading ‘*I oppose genocide – I support Palestine Action*’. Given the large number of photographs, and in the interests of proportionality, I exhibit only one post with four photographs attached at **MS7/219 – 222**. In the accompanying caption, Defend our Juries claims responsibility for organising the protest:

...This week, in London, Cardiff and Manchester, many more defied the law, committing mass civil disobedience by holding banners in support of #PalestineAction.

The direct action group was proscribed as a terrorist group by the Home Secretary Yvette Cooper (who has received hundreds of thousands of pounds funding from pro-Israel lobbyists).

Protests organised by @defendourjuries

47. Sky News online again published an article reporting on the protests and the arrests. I exhibit a copy of the article dated 12 July 2025 (<https://news.sky.com/story/more-than-70-arrests-at-protests-over-palestine-action-ban-13395938>) at **MS7/223 – 229**, in which it is reported that 70 arrests were made in total.
48. On 15 July 2025, an incident occurred at a Leonardo site in Edinburgh (Leonardo is also a manufacturer of components with military end uses in Israel). According to the Sky News Online report that I exhibit at **MS7/230 – 233** (<https://news.sky.com/story/three-women-arrested-under-terrorism-act-after-van-driven-into-edinburgh-factory-fence-owned-by-defence-company-13397143>), three women were arrested after driving a van into the site in a pro-Palestinian protest. The incident was attributed to a newly formed group, ‘Shut Down Leonardo’. I exhibit at **MS7/234** a copy of the Instagram page of the group as it appeared on 16 July 2025, which has only four posts, three of which relate to the incident.
49. On 15 July 2025, Defend Our Juries made a post to its Instagram page, accompanied by a video. The caption in the accompanying text reads, in part ‘*sign up for action on July 19th*’, and directs readers to the relevant link. I exhibit a copy of the post at **MS7/235**. It is clear from this post that Defend our Juries is co-ordinating the anti-proscription movement, and intends to continue such actions.
50. Several posts on the Defend our Juries Instagram page also refer to a website: wedonotcomply.org. I exhibit a copy of that webpage at **MS7/236 – 239**. That website encourages protest that breaches the proscription of Palestine Action, stating:

[w]e will not comply with this unjust law. Many people from celebrities to artists, to writers to journalists to activists are intending to break this unjust law. We will do it

together. Unjust laws are no laws at all. Mass law breaking is the heart of classical civil disobedience. The law you disagree with, you break en masse.

51. The same webpage states that ‘[e]very Saturday, people will be taking action to defy the ban’, and credits Defend Our Juries as defying the ban on 5 July 2025.
52. On Saturday 19 July 2025, the protest advertised by Defend our Juries took place. I exhibit at **MS7/240 – 245** a Sky News online article that reports that more than 100 people were arrested across the UK for protesting against the proscription (with protests and arrests having taken place in Parliament Square, Manchester, Edinburgh and Truro). The Defend our Juries Instagram page also published 22 posts with various videos and photos of the nationwide protests and arrests (including others not mentioned in the Sky News article). In the interests of proportionality, I will not exhibit those here, save for one of the posts on 19 July 2025 (which was accompanied by a video), and which promotes an ‘*action on August 9th 2025, as we collectively oppose the proscription of the direct action group. The mass action is conditional on reaching our target of at least 500 commitments*’, which I exhibit at **MS7/246**.

Continued apprehension of future protests

53. It is clear from the above that Palestine Action, and its aims and method of protest are widely supported in the pro-Palestinian campaign sphere, and also by other direct-action protest groups more generally. Accordingly, it is not only members of Palestine Action of whom the Claimant needs to be aware, and from whom its sites need protecting; there are multiple other groups, with unknown memberships, who, in especially the current climate, are likely to attend the Claimant’s sites and engage in acts of direct-action protest in support of their cause (and in solidarity with Palestine Action).
54. The effect of the proscription has been to unite and mobilise activists from across the spectrum, and the ironic consequence is that the Claimant is probably more at risk of further direct-action now than it has ever been. The proscription reduces the visibility of Palestine Action and its supporters, and if anything makes it harder for the Claimant to keep track of and be sighted of the risk posed.

55. It is also evident that some activists are willing to defy the proscription and protest under the banner of, or in support of and solidarity with, Palestine Action.

56. Further, the proscription of Palestine Action does not prevent activists sympathetic to the cause from protesting under the banner of other already established or newly formed organisations, or as a ‘lone wolf’. Pro-Palestinian activists have not ceased to exist because of the proscription. On the contrary – they exist, currently have a swell of support from other direct-action groups (many of whom do not have a pro-Palestinian focus), and are agitated by the proscription.

Additional Information

57. I can confirm that the Claimant’s six sites that are the subject of this Claim remained listed as ‘targets’ on the Palestine Action website prior to its removal, with their addresses published. I exhibit a copy of that webpage as it appeared on 25 June 2025 at **MS7/247** (see also <https://targetmap.org/company/2>).

58. Mr Wargent has provided me with an updated spreadsheet which captures all additional protests that have occurred at the Claimant’s sites since the date of his fourth witness statement. I exhibit the same at **MS7/248 – 253**. I am instructed that all protests have been peaceful and not in the nature of those which the Claimant seeks to prohibit; no breaches of the injunction have been observed.

59. On 18 July 2025, Mr Wargent informed me that **D16 Lara Downes** and **D17 Gabrielle Middleton** have now been charged with burglary, criminal damage and causing a public nuisance.

60. As the Palestine Action website has been removed, it was not clear to me whether the email addresses set out in the alternative service order and which relate to Palestine Action would continue to work. On 18 July 2025, in accordance with the directions of Tipples J, the hearing bundles were served on Persons Unknown, including by way of email to the various Palestine Action email addresses (certificates of service are exhibited at **MS7/254 – 258**). I can confirm that no bounce-back email or similar notification of non-delivery has been

received by my firm. Accordingly, it would appear that the email addresses are still active and in use by the group.

Conclusion

61. Following the filing and serving of evidence in May 2025, Palestine Action continued to be extremely active and engage in acts of unlawful direct-action protest, which included causing significant property damage. These acts have all taken place at sites and against entities who do not have the benefit of injunctive relief; the Claimant's site have not been targeted in this period.
62. Following the action at RAF Brize Norton 20 June 2025, a sequence of events was sent in motion that has led to the proscription of Palestine Action under the Terrorism Act 2000.
63. It is clear, as it always has been, that Palestine Action is not the only direct-action group operating in the pro-Palestinian sphere whose members are likely to engage in unlawful acts of protest at the Claimant's sites. Far from dampening the risk of such action, the proscription announcement has caused an outpour of support and pledges of allegiance and solidarity with the group and its methods, with groups doubling down on the need to take direct-action now to achieve their desired aims.

Statement of Truth

I believe that the facts set out in this Witness Statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Manan Singh

.....

Manan Singh

Dated this 21 day of July 2025