IN THE HIGH COURT OF JUSTICE **Claim No. KB-2024-004175**

KING'S BENCH DIVISION

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

HEARING BUNDLE FOR

ANNUAL REVIEW HEARING ON 21 JULY 2026

(CLAIM FORMS AND PREVIOUS WITNESS STATEMENTS)

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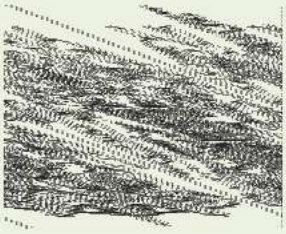

Re-Amended

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 applicable)	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

HIGH COURT OF JUSTICE
13 Dec 2024
QUEEN'S BENCH DIVISION

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.

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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	Month	Year
13	12	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

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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:

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    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

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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 ats 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.

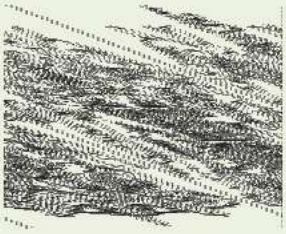
AND the Claimant Claims:

(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 applicable)	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

HIGH COURT OF JUSTICE
13 Dec 2024
QUEEN'S BENCH DIVISION

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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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

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☐ **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.

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☐ 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	Month	Year
13	12	2024

Re-dated on 27 January 2025

Full name

MANAN SINGH

Name of claimant's legal representative's firm

KEYSTONE LAW

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PARTNER

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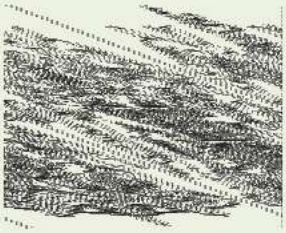

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Claim no.	
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106 Waterhouse Lane
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Essex
CM1 2QU

HIGH COURT OF JUSTICE
13 Dec 2024
QUEEN'S BENCH DIVISION

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☐ 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	Month	Year
13	12	2024

Full name

MANAN SINGH

Name of claimant's legal representative's firm

KEYSTONE LAW

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PARTNER

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IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO.

B E T W E E N :

TELEDYNE UK LIMITED

Claimant

-and-

(1) JULIAN ALLEN GAO

(2) RUBY HAMILL

(3) DANIEL JONES

(4) NAJAM SHAH

(5) RICKY SOUTHALL

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Defendants

FIRST WITNESS STATEMENT OF NICHOLAS JAMES WARGENT

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

1. I am a director of the Claimant, Teledyne UK Limited (**'Teledyne UK'**). Teledyne UK is a wholly owned subsidiary of Teledyne Technologies Incorporated, a New York Stock Exchange listed company (together the **'Teledyne Technologies Group'**). The Teledyne Technologies Group's operations are primarily located in the United States, the United Kingdom, Canada, and Western and Northern Europe.

2. I am also an in-house solicitor and General Counsel for the Europe, Middle East and Africa, and Asia-Pacific regions for the Teledyne Technologies Group, and I am duly authorised to make this witness statement on behalf of Teledyne UK.

3. I make this witness statement in support of Teledyne UK's Claim for injunctive relief against the above Named Defendants and various categories of Persons Unknown, and also Teledyne UK's Application for interim relief and an alternative service order.

4. The facts and matters set out in this statement are within my own knowledge unless otherwise stated, and I believe them to be true. Where I refer to information supplied by others, the source of the information is identified; facts and matters derived from other sources are true to the best of my knowledge and belief.

5. There is now produced and shown to me a paginated bundle of true copy documents marked **NJW-1**. All references to documents in this statement are to Exhibit **NJW-1**, and are in the format **NJW-1/page number**.

6. To assist in the navigation of this witness statement, I shall address:

   i. Introduction and overview of the relief sought;
   ii. Teledyne UK Limited;
   iii. Teledyne UK Limited's sites;
   iv. The relevant protest groups;
   v. Protests that have already occurred at Teledyne UK's sites;
   vi. The Defendants to this Claim and Application;
   vii. Apprehension of future protests and harm; and
   viii. Teledyne's response to mitigate the apprehended harm.

INTRODUCTION

7. Broadly, and as I shall explain further below, Teledyne UK is, by reason of its business activities, a target for pro-Palestinian protests. Typically, but not exclusively, those protests are and have been carried out by persons who associate with one or more of the groups known as 'Palestine Action', 'Palestine Solidarity Campaign' and 'Bradford Friends of Palestine'.

8. By this Claim and Application, Teledyne UK is seeking injunctive relief to protect six of its sites against acts of unlawful protest. Those sites are:

   i. The **'Shipley Site'** (Teledyne UK Limited, Airedale House, Acorn Park, Shipley BD17 7SW);

ii. The **'Lincoln Site'** (Teledyne UK Limited, 168 Sadler Road, Lincoln LN6 3RS);

iii. The **'Wirral Site'** (Teledyne UK Limited, Unit A, 6 Tebay Road, Bromborough, Birkenhead, Wirral CH62 3PA);

iv. The **'Chelmsford Site'** (Teledyne UK Limited, 106 Waterhouse Lane, Chelmsford CM1 2QU);

v. The **'Presteigne Site'** (Teledyne UK Limited, Broadaxe Business Park, Presteigne LD8 2UH); and

vi. The **'Newbury Site'** (Teledyne UK Limited, Reynolds Navigation House, Canal View Road, Newbury RG14 5UR).

9. Teledyne UK also operates its business from other sites across the country; however, relief is sought in relation to only these six sites. As I shall explain below, the addresses of these six sites are published on the Palestine Action website and listed as 'targets' for direct action protest, such that Teledyne UK reasonably apprehends that acts of protest will occur at these sites.

10. Teledyne UK seeks injunctive relief in relation to all six sites to restrain acts of trespass (including the entering and remaining on Teledyne UK's land, and in buildings, and the defacing of buildings and land with spray paint or similar). As I shall explain in this witness statement, Teledyne UK has experienced several acts of trespass at its sites, with aggravating features, the frequency of which has increased throughout 2024.

11. Further, in relation to the Shipley Site, Teledyne UK also seeks injunctive relief to restrain interference with its common law right to access the highway from its land, as well as injunctive relief to prevent public nuisance (that being obstruction of the highway). Obstruction of access to the Shipley Site is becoming an increasingly common feature of the direct action that Teledyne UK is experiencing at its sites, and the disruption of access to and from target sites is a well-known and often-used tactic of those engaged in direct action protest (and is a known tactic of the group known as Palestine Action, as I shall explain below). Three such incidents have been experienced

in recent months at the Shipley Site, on 30 October and 20 and 28 November 2024, in which the gate to the site was blocked by protestors who appear to be associated with the group known as Bradford Friends of Palestine. I will explain more about these incidents below.

12. The Shipley Site has been identified as requiring this additional protection (and not just protection against trespass) because (i) Teledyne has already experienced access to the Shipley Site being disrupted and (ii) the location and topography of the site is such that it can be easily blockaded, and any blockade could also have an adverse impact on Teledyne UK's neighbours (as I shall explain further below, the site is served by a single dead-end access road, which is shared with other businesses, and which is accessed via a main A-road).

13. Teledyne UK (and I personally) respect the democratic rights of citizens of this country (and indeed elsewhere) to lawfully protest and hold peaceful demonstrations in support of causes they believe in, and the injunction sought by Teledyne UK does not in any way seek to impede or circumvent that fundamental and important human right. Teledyne UK seeks only to restrain protest activity that goes beyond that which is peaceful and lawful. Specifically, Teledyne UK seeks to prevent further trespasses at its sites (which in the past has been aggravated and caused significant property damage), and the serious risks posed to the health, safety and well-being of employees and personnel present on site at the time of such aggravated attacks; Teledyne UK owes duties, as a matter of law, to provide a safe working environment for its employees, contractors and others visiting its sites.

14. This Claim and Application is being made now as (i) there has been a significant increase in the frequency of unlawful protest activity at Teledyne UK's sites throughout 2024, (ii) Teledyne UK apprehends acts of protest over the Christmas period as people (including protestors) typically enjoy time off work and have more time at their disposal – indeed, as I shall explain below, an incident occurred at the Shipley Site on Boxing Day in 2023 (with incidents also occurring at the Shipley Site during the Easter vacation and October half-term of this year), and (iii) it is a sad fact that the situation in the Middle East continues to deteriorate, such that those who choose to engage in direct

action protest in relation to that cause may feel inclined or compelled to take action at this time (as they have with increased frequency throughout 2024).

15. Teledyne UK obtained intelligence that a protest was being planned at the Chelmsford Site for 8 December 2024, but that the protest was then cancelled because of the bad weather caused by storm Darragh. The intelligence that Teledyne UK received suggested that the planned protest was intended to be peaceful; protestors were planning to stand on the pavement of Waterhouse Lane, on which the Chelmsford Site is located, and hold placards. The intelligence now suggests that this protest has been rescheduled for 22 December 2024. I stress that this not the kind of protest that Teledyne UK seeks to prohibit, nor should it. This kind of protest would not be caught by the terms of the injunction order sought. The public have every right to engage in this sort of protest, and Teledyne UK respects that rights and expects the law to uphold that right.

TELEDYNE UK LIMITED

16. 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.

17. Teledyne UK is a global leader in specialised components and subsystems for innovative solutions in medical, science, aerospace, defence and industrial applications. Specifically, Teledyne UK is known for its innovation in semi-conductors, high power RF, imaging and precision timing and engineered systems. Across its UK sites, Teledyne UK mainly manufactures products for commercial use in a vast range of industrial markets, including aerospace and defence, factory automation, air and water quality environmental monitoring, electronics design and development, oceanographic research, energy, medical imaging and pharmaceutical research. Teledyne UK also provides electronic components and subsystems and communications products, including defence electronics, data acquisition and communications equipment for air transport and business aircraft, and components and subsystems for wireless and satellite communications.

18. Teledyne UK typically manufactures components and subsystems that are incorporated by its customers into their own products, which go on to be used in a variety of applications and end-uses. The core technologies on which the products manufactured by Teledyne UK are based can be used in very different end applications. For example, Teledyne UK manufactures RF magnetrons that generate radio frequency (RF) power: RF magnetrons can be used to power radiotherapy machines for the treatment of cancer, as well as commercial and military radar systems. On the same site, a Teledyne UK business unit can manufacture products that have both commercial and military end-uses.

19. The majority of Teledyne UK revenue is derived from products with commercial end uses, some of which are used in critical national infrastructure, from healthcare to space observation. Teledyne UK also manufactures products that are dual-use or have military applications. Many of those products are manufactured for use by the UK Ministry of Defence, other NATO member states and other allied nations. Exports are also made to commercial businesses outside the UK, including those in Israel and the Ukraine. Dual-use and military products exported by Teledyne UK are exported under UK Government-approved export licences, and Teledyne UK complies with the UK Government's export compliance regime.

20. Furthermore, three of Teledyne UK's sites that are the subject matter of this Claim and Application have 'FSC status' (formerly known as 'List X' status), those being Shipley, Chelmsford and Lincoln. FSC stands for 'facility security clearance', and is a requirement of being a UK Government defence supplier. FSC status is required as Teledyne UK holds contracts with the UK Ministry of Defence which requires it to safeguard assets classified SECRET or above on its premises. FSC status is required to ensure that Teledyne UK meets and maintains the required protective controls to safeguard the classified assets.

21. Teledyne UK's sites therefore form a critical part of the UK defence supply chain, and form an important part of the UK's ability to protect its security and advance national interests, and the security of the UK's allies. Disruption to production at Teledyne UK's sites threatens national security: for example, delays to the manufacture and repair of radar warning systems and components for the UK Ministry of Defence not only

increases costs for the UK taxpayer, but places serving personnel at increased risk of shortages and equipment failure.

22. Therefore, Teledyne UK's sites are extremely sensitive; it is unacceptable to have unauthorised persons trespassing on the sites, entering the buildings and damaging the buildings and property (as protestors have done). At many of Teledyne UK sites, particularly at those where research, development and production occur, there are additional sensitivities. For example, some areas must be kept sterile, and hazardous materials and chemicals are stored on site. Many sites contain highly specialised (and expensive) equipment, which require special skills and knowledge to safely operate. It is unacceptable and dangerous to have trespassers who are not aware of those sensitivities and the risks that that they pose roaming the sites; it not only places the trespassers at risk, but those who have to retrieve them from the buildings and clear up after them.

23. The Teledyne Technologies Group employs approximately 1,750 staff across the UK.

TELEDYNE UK LIMITED'S SITES

24. Below are the necessary and relevant details for the six Teledyne UK sites in relation to which injunctive relief is sought. Teledyne UK holds either the freehold or leasehold titles to each of the sites.

The Shipley Site

25. The Shipley Site has FSC status.

26. Teledyne UK holds the freehold title to the Shipley Site, which is registered at HM Land Registry under Title Number WYK387275. I exhibit at **NJW-1/1 – 7** the official copy of the register of title and accompanying plan; the Shipley Site is edged in red. I also exhibit at **NJW-1/8 – 9** two satellite images of the Shipley Site, on which the site is edged in red.

27. As can be seen from the plan filed at HM Land Registry, the Shipley Site is only accessible via a single access point to the North West of the site, off the road named Acorn Park. That access is gated, and the gate is operated by way of an electronic fob. The entire perimeter of the Shipley Site is fenced; the site cannot be accessed without passing through the gate (or over the fence line).

28. Acorn Park is an adopted highway maintainable at public expense, and connects to the A6038 (Otley Road)). As can be seen from the plan filed at HM Land Registry, Acorn Park is not a through-road (it is effectively a dead-end road).

29. Acorn Park also serves as the sole access to a number of adjoining properties and businesses (including the "Warehouse" marked in yellow on the plan document which is currently a printing business, and other tool and trade merchants), some of which frequently receive deliveries by HGVs.

The Wirral Site

30. Teledyne UK holds the leasehold title to the Wirral Site, which is registered at HM Land Registry under Title Number MS575234. I exhibit at **NJW-1/10 – 17** the official copy of the register of title and accompanying plan; the Wirral Site is edged in red. I also exhibit at **NJW-1/18 – 19** two satellite images of the Wirral Site, on which the site is edged in red.

31. There is sometimes reference made to 'Teledyne CML Group Limited' in the address to the Wirral Site, including by Palestine Action. 'Teledyne CML' is a business unit and trading name of Teledyne UK, the business and assets of Teledyne CML Group Limited having been transferred to Teledyne UK. The Teledyne CML Group Limited company is however retained and not dissolved for various business-related reasons.

32. As can be seen from the plan filed at HM Land Registry, the Wirral Site is only accessible via a single access point, off the road named Tebay Road. That access is gated. The vehicle gate is operated by way of a padlock, and pedestrian access by way

of passcode barrier entry. The entire perimeter of the Wirral Site is fenced; the site cannot be accessed without passing through the gate (or over the fence line).

33. Tebay Road also serves as the sole access to a number of adjoining properties and businesses (including Tebay Retail Park, B&M Home Store, Magnet Kitchens and Magnet Trade), some of which frequently receive deliveries by HGVs.

The Chelmsford Site

34. The Chelmsford Site has FSC status.

35. Teledyne UK holds the freehold to the Chelmsford Site, which is registered at HM Land Registry under Title Number EX688035. I exhibit at **NJW-1/20 – 26** the official copy of the register of title and accompanying plan; the Chelmsford Site is edged in red. I also exhibit at **NJW-1/27** a satellite image of the Chelmsford Site, on which the site is edged in red.

36. The official copy of the register lists 'Teledyne E2V (UK) Limited' as the registered proprietor of the site. That is the former name of Teledyne UK, and evidence of the change of the company name is recorded at Companies House and exhibited at **NJW-1/28 – 29.** In any event, it is clear that the company number recorded on the official copy of the register of title matches that of Teledyne UK.

37. The majority of the Chelmsford Site is fenced, with two vehicle access gates and three pedestrian access gates. The reception at the front of the building is open to the pavement: access further into the site is controlled by swipe card access.

The Presteigne Site

38. Teledyne UK holds the leasehold title to the Presteigne Site. The Presteigne Site comprises two legal titles.

39. The first, which is 'Unit 1', is a registered leasehold title, registered at HM Land Registry under Title Number CYM839162. **NJW-1/30 – 34** the official copy of the

register of title and accompanying plan; the Unit 1 of the Presteigne Site is edged in red. I also exhibit at **NJW-1/35** a satellite image of Unit 1 of the Presteigne Site, on which the site is edged in red.

40. The second, which is 'Unit 5 and Unit 6', is not registered at HM Land Registry, it being a lease for five years (and therefore not registrable). I can however confirm that the current lease is dated 9 October 2024, and is for a term of five years. I exhibit at **NJW-1/36 – 89** a redacted copy of the lease (given the sensitive nature of Teledyne UK's business, I hope the court will understand the desire to redact the lease, save to evidence the demise for the purposes of the trespass claim).

41. A satellite image, on which Units 5 and 6 are outlined in red, is exhibited at **NJW-1/90.**

42. There is sometimes reference made to 'Teledyne Labtech Limited' in the address to the Presteigne Site, including by Palestine Action. 'Teledyne Labtech' is a business unit and trading name of Teledyne UK, the business and assets of Teledyne Labtech Limited having been transferred to Teledyne UK. The Teledyne Labtech Limited company is however retained and has not been dissolved for various business-related reasons.

43. The perimeters of both Unit 1 and Units 5 and 6 are fenced, with electronic keypad access for both vehicle and pedestrian gates.

The Lincoln Site

44. The Lincoln Site has FSC status.

45. Teledyne UK holds the freehold title to the Lincoln Site which is registered at HM Land Registry under Title Number LL317736. I exhibit at **NJW-1/91 – 99** the official copy of the register of title and accompanying plan; the Lincoln Site is edged in red. I also exhibit at **NJW-1/100** a satellite image of the Lincoln Site, on which the site is edged in red.

46. The official copy of the register lists 'Teledyne E2V (UK) Limited' as the registered proprietor of the site. That is the former name of Teledyne UK, and evidence of the

change of the company name is recorded at Companies House and exhibited at **NJW-1/28 – 29.** In any event, it is clear that the company number recorded on the official copy of the register of title matches that of Teledyne UK.

47. The entire perimeter of the Lincoln site is fenced.

The Newbury Site

48. Teledyne UK holds the leasehold title to the Newbury Site which is registered at HM Land Registry under Title Number BK365055. I exhibit at **NJW-1/101 – 105** the official copy of the register of title and accompanying plan; the Newbury Site is edged in red. I also exhibit at **NJW-1/106** a satellite image of the Newbury Site, in which the site is edged in red.

THE RELEVANT PROTEST GROUPS

49. The protestors that attend Teledyne UK's sites appear to be associated with, or gravitate around, organised groups. To that end, Teledyne UK is aware of three groups in particular: Palestine Action, Bradford Friends of Palestine (in relation to the Shipley Site) and the Palestine Solidarity Campaign (which has various local branches).

Palestine Action

50. Of these three groups, Palestine Action is notably more 'extreme', and promotes acts of unlawful direct action protest; many of the historic acts of aggravated trespass at Teledyne UK's sites have been carried out by and attributed to followers of the Palestine Action group. I shall explain more about these incidents later in this witness statement.

51. Further, Palestine Action also promotes, publicises and claims responsibility for various other aggravated attacks at sites owned by companies that it associates with the conflict in the Middle East, such as Elbit Systems, Barclays Bank, Allianz and Thales (to name just a few). Examples of the various attacks that Palestine Action takes credit for can be found in the 'News' section of its website: https://palestineaction.org/news/.

As can be seen from that section of the website, those actions often include spray painting of buildings and the smashing of windows, the occupation of buildings, and the blockading of sites. Examples include (but are certainly not limited to):

i. The blockading of CDW UK's offices in Manchester on 1 July 2024 by using a vehicle and locking-on device, whilst one protestor occupied the ledge at the building's entrance: https://palestineaction.org/cdw-manchester/ (exhibited at **NJW-1/107 – 109)**;

ii. The smashing of windows and spray painting of 12 Barclays Bank sites overnight on 12 September 2024: https://palestineaction.org/barclays-nationwide/ (exhibited at **NJW-1/110 – 112**); and

iii. The blockading of two sites in Bristol at which Elbit Systems conducts its business on 12 November 2024. The activists used vans and locking-on devices to block the gates to the sites: https://palestineaction.org/bristol-sites-shut/ (exhibited at **NJW-1/113 – 114)**.

52. Palestine Action's cause gravitates around the slogan of "shut Elbit down" (Elbit being a reference to Elbit Systems Ltd – which is an Israel-based company engaged in defence and security work, and which develops and supplies airborne, land and naval systems). However, it is clear that those who associate with Palestine Action have a far wider range of targets for their direct action protests. Specifically, and as I shall explain further below, Palestine Action lists the six Teledyne UK sites (with their addresses) that are the subject matter of this Claim and Application as 'targets' for direct action: https://elbitsites.uk/company/2/ (exhibited at **NJW-1/115**).

53. Palestine Action is a highly active organisation. In particular:

i. The homepage of the Palestine Action website (https://palestineaction.org) (**NJW-1/116 – 122**) contains links to pages where potential activists can 'join the resistance' and "*sign up to get involved in the campaign to shut down Israel's weapons trade*", 'fund the movement' and 'attend an online workshop' which run every Wednesday and Friday at 7pm, and Sunday at 3pm;

ii. I exhibit at **NJW-1/123 – 124** a copy of the form by which potential activists can sign up to 'join the resistance': https://palestineaction.org/join-the-resistance/;

iii. Palestine Action organises workshops for its activists across the country, including direct action training and arrestee support (which clearly pre-supposes that its activists will be arrested for their actions and require the support of volunteers). The relevant webpage is at https://palestineaction.org/workshops/. I note that the page is updated frequently, with new workshops released regularly (and at fairly short notice). For example, I exhibit PDFs of the webpage as access on 27 November 2024 (**NJW-1/125**) and 1 December 2024 (**NJW-1/126**).

Palestine Action: the Underground Manual

54. Palestine Action has produced, and published on its website, a PDF document entitled 'THE UNDERGROUND MANUAL'. That manual appears to be intended to advise, encourage and instruct activists as to how they can conduct acts of direct action protest.

55. I exhibit a copy of that manual at **NJW-1/127 – 140**. There are seven chapters to the manual, which are:

i. 'Create a cell'. Activists are encouraged to band together in small cells to organise and carry out acts of direct action protest;

ii. 'Pick a target'. Activists are encouraged to pick a target for their direct action (using a secure browsers, if conducting internet research). In this chapter, 'Teledyne' is expressly listed as a target that should be considered and, if the 'check out the targets' link is followed, a map is accessed on which Palestine Action have plotted what they consider to be targets for direct action. As I have set out above, here, the six Teledyne UK sites that are the subject matter of this Claim and Application are listed, along with their addresses;

iii. 'Prepare for action'. This chapter instructs activists how to conduct reconnaissance of the sites that they have selected as a target for their direct action;

iv. ‘Plan your action’. This is the largest chapter and includes suggestions as to the type of action that might be undertaken, how to get to and from a target undetected, how to evade arrest and how to divide roles amongst cell members. The types of action suggested are all unlawful, and are not acts of peaceful protest: using re-purposed fire extinguishers to spray paint, ‘regular’ spray painting, smashing windows and exterior equipment, blocking pipes and breaking in. There is also extensive guidance as to how to avoid identification and capture, including by using burner phones, face coverings, dark loose-fitting clothing, plain trainers and covering the whole body;

v. ‘Take action’;

vi. ‘Post-action’. Activists are advised to destroy all evidence;

vii. ‘Technology and security’. Activists are encouraged to use burner phones, VPNs, Protonmail, Signal and devices such as faraday cages to reduce their digital footprint and avoid detection and identification.

56. It is clear from the Underground Manual that the acts promoted and encouraged by Palestine Action to its followers are all unlawful and are not acts of peaceful protest. Anyone following the guidance in this manual would not be protesting within the boundaries of the law.

57. Further, much of the content of the manual is also focussed on instructing and advising activists as to how they may keep their identities unknown. If activists were to successfully follow each of the suggested steps and also avoid arrest, it would be almost impossible to identify and trace activists (and name them for the purposes of legal proceedings).

58. Palestine Action, by way of the Underground Manual, and the publishing of the addresses of the six Teledyne UK sites, are also clearly encouraging and facilitating acts of unlawful direct action protest at those sites.

Bradford Friends of Palestine

59. The group known as Bradford Friends of Palestine does not, to my knowledge, operate a website (but does operate various social media accounts, and has an email address).

60. This protest group operates in and around the Bradford area which, geographically, includes the Shipley Site. Activists associated with this group were responsible for the protest incidents on 30 October and 20 and 28 November 2024 at the Shipley Site, during which the access to the Site was obstructed (and blocked) for several hours. Whilst the actions of the protestors on these occasions were very disruptive (and unlawful), it is fair to say that Teledyne UK's experience of this group, to date, is that they deploy less aggravated tactics when compared to those activists who take action under the banner of Palestine Action. This group has also in the past conducted peaceful protests at the Shipley Site. For example, historically, if protestors attended the Shipley Site and stood outside the gate, they would move to one side and allow access to and from the site when a vehicle approached.

61. From my review of the Bradford Friends of Palestine Instagram account, it appears that the group primarily adopts tactics of marches, sit-ins at public places (such as shopping centres) and assembling at locations with placards and banners (including, as I have mentioned, outside the gate at the Shipley Site, recently blocking access to the site).

Palestine Solidarity Campaign

62. The Palestine Solidarity Campaign (**'PSC'**) is a long-established community that also adopts a pro-Palestinian message. The group operates a website, which can be found here: https://palestinecampaign.org. This group is a legal entity, and is registered as a company limited by guarantee with company number 5213508. I exhibit at **NJW-1/141** the record of the company at Companies House.

63. From my reading of the website, and my understanding of PSC, it is well organised and undertakes a wide range of work in pursuit of its cause; these activities include protests, the production of information leaflets, various campaigns and lobbying activities.

64. PSC Campaign has several regional branches, including in regions where a number of Teledyne UK sites are located (such as Bradford, Chelmsford, Lincoln & District, Liverpool and Shropshire).

65. I must stress that by naming and discussing the PSC in this witness statement I am not suggesting that it has done anything unlawful. I am merely describing the context against which this Claim and Application is made. As I have set out above, both I and Teledyne UK respect and fully support the right to peaceful protest. Indeed, the protest planned for outside the Chelmsford Site on 8 December 2024, and which was expected to be peaceful, was organised by the Chelmsford branch of the PSC.

66. I also refer to the PSC because it is suggested that to assist with giving notice of the Claim, Application and any injunction to Persons Unknown, the same should be emailed to the PSC and any relevant regional branches. That suggestion is made to ensure that all those persons who may be inclined to attend Teledyne UK's site with a view to engaging in protest are aware of any injunction and its terms. I understand from those advising Teledyne UK that the need for and terms of the proposed alternative service order will be dealt with in the witness statement of Mr Manan Singh of Keystone Law.

PROTESTS AT TELEDYNE UK LIMITED'S SITES

67. Teledyne UK has experienced acts of unlawful direct action protest, and suffered harm as a result. As I shall explain below, some of these protest incidents have been aggravated, and have caused significant loss to Teledyne UK.

68. Some acts of protest experienced by Teledyne UK have been lawful. As I explained earlier, Teledyne UK does not seek to prohibit acts of lawful and peaceful protest, and fully supports the rights of citizens to protest in such a way. For example, Teledyne UK does not take issue with protestors standing outside its sites with placards and banners, and making as much noise as they want to ensure that their message is heard. What Teledyne UK takes issue with is when protestors trespass on its sites, or prevent access to its sites.

69. I exhibit at **NJW-1/142 – 144** a spreadsheet. That spreadsheet has been passed to me, and is maintained by, a colleague at Teledyne UK. The spreadsheet records the incidents of protest that have occurred at Teledyne UK's sites since December 2022. Teledyne UK takes the view that many of these protests have been 'lawful'; many fall into the category of protestors attending a site with banners and placards, and making noise to ensure that their message is heard, with the protestors moving to one side to allow staff and visitors to gain access to the sites.

70. However, not all of the protest incidents recorded in the spreadsheet are lawful; where Teledyne UK has experienced unlawful acts of protest, I have given further details of the incident below.

71. I have redacted the spreadsheet to remove references to the names of employees of Teledyne UK, or any protestors who are not being named as a Defendant to these proceedings.

9 December 2022: the Presteigne Site

72. On 9 December 2022, at approximately 6am, at least four persons broke into the reception area of the Presteigne Site; they were wearing balaclavas to conceal their identities. They were armed with crowbars and sledgehammers. As is evident from Palestine Action's social media posts exhibited at **NJW-1/145 – 146**, these persons were associated with Palestine Action.

73. These persons proceeded to gain access to the roof of the Presteigne Site using a ladder that they had brought with them, and they caused extensive damage to the roof and to the premises generally. They entered the premises and smashed glass doors and windows, damaged IT equipment and sprayed the inside and outside of the premises with red paint (using re-purposed fire extinguishers, which Palestine Action encourages activists to use in its Underground Manual). The protestors destroyed the controllers of hot manufacturing equipment, so they could not be safely switched off, and then sprayed paint into the hot equipment and associated motors. They also released flares

and pyrotechnic devices in the chemical processing area, in close proximity to a number of vats of potentially dangerous, even lethal, chemicals.

74. I exhibit at **NJW-1/147 – 158** photographs of the damage caused by the trespassing protestors. Those photographs show the extensive damage to the skylights and windows of the building, the extensive use of red paint, and the large amount of shattered glass left throughout the building. In addition, the photographs show the protestors sitting on the roof.

75. The attack lasted for approximately 5-6 hours, and the Dyfed-Powys police and fire service attended the Presteigne Site to remove and arrest four persons. All four persons remained in custody on remand until their trial in May 2023, charged with conspiracy to commit criminal damage. Three of those on trial changed their pleas to guilty immediately before trial, and one person was found guilty at trial. All of them received custodial sentences.

76. Teledyne UK suffered extensive loss as a result of this incident. The cost of repairing and clearing up the damage caused by the protestors was in the approximate sum of £1.2m. In addition, the business was unable to complete and ship approximately US$1,000,000 of sales in December 2022.

77. The site was able to partially re-open on 12 December 2022, with a limited team to commence clean up and make safe the working areas. All employees were not able to return to the business until 19 December 2022. The clean-up operation and repairs to the roof and windows lasted several months, and caused ongoing disruption to the business. As well as the cost of increased security, the disruption cost the business approximately another £266,000.

28 September 2023: the Chelmsford Site

78. On 28 September 2023, the Chelmsford Site was hosting an open day for graduates (Teledyne UK is one of the biggest private employers, if not the biggest, in the Chelmsford area). An individual associated with Palestine Action splashed red paint

across the front of the building (as shown in the photographs exhibited at **NJW-1/159 – 161**).

79. The incident also featured in a 'news' item on the Palestine Action website, exhibited at **NJW-1/162 – 164.**

80. While the physical damage and financial harm from this protest incident was not particularly significant when compared to other incidents experienced by Teledyne UK, this incident was clearly intended to cause reputational harm to the business and to deter future employees from considering a career with us.

81. Whilst Essex Police did not attend this particular incident, there was a subsequent phone call between me and a Detective Chief Inspector at Essex Police to discuss the incident and future response of Essex Police to incidents at the Chelmsford Site.

82. No arrests have been made in relation to this incident, and no suspects identified.

26 December 2023: the Shipley Site

83. On 26 December 2023 (Boxing Day), at approximately 4.30am, one individual gained access to the Shipley Site by climbing over the fence. They then approached the building and attempted to set fire to a goods entrance.

84. I exhibit at **NJW-1/166** a still CCTV image which shows the trespasser inside the Shipley Site, running away from the fire that they have started.

85. I exhibit at **NJW-1/167 – 169** photographs of the damage that was caused by the fire. Luckily, as can be seen from the photographs, limited damage was done to a very small area of the site. Nevertheless, the fire damage caused to the entrance to the main building incurred costs of approximately £35,000 to repair.

86. West Yorkshire Police responded to the incident; approximately 10 police officers attended the Shipley Site. An individual was later arrested, but the CPS elected not to bring any charges on the evidence available.

2 April 2024: the Shipley Site

87. On 2 April 2024, at approximately 5.30am, a group of around 20 protestors attended the Shipley Site. Four of these protestors managed to climb on to the roof of the premises and proceeded to cause extensive damage to the roof tiles and brickwork, as well as the glass doors and windows. The protestors were wearing the red overalls often worn by Palestine Action protestors when they carry out acts of direct action protest.

88. I exhibit at **NJW-1/170 – 182** a selection of photographs that show the damage caused by the protestors, including by the broken roof falling through into the building below. Those photographs also capture the protestors on the roof, and using a sledge hammer to smash the roof tiles. The final photograph shows the items that were seized by the police when they attended the site; these include a sledge hammer, ladder and fire extinguisher.

89. The incident lasted for approximately 16 hours, and the emergency services attended the Shipley Site in significant numbers. West Yorkshire Police arrested the four protestors who accessed the roof of the premises: Julian Allen Gao, Ruby Hamill, Daniel Jones and Najam Shah. As I shall explain below, all have been named as Defendants to this Claim and Application. These individuals went on trial in September 2024, and all pleaded not guilty to damaging property, and possession of articles with intent to destroy or damage property. The trial resulted in a hung jury and a retrial is set for February 2026.

90. Teledyne UK suffered significant loss as a result of this incident. The cost to repair the damaged caused by the protestors and clean up after them was estimated to cost in excess of £571,000. Production was interrupted for five days, causing a loss of revenue in excess of £300,000.

91. The site was shut during the incident and for the rest of 2 April 2024. Whilst the business was able to return to full production within a week, around half of the main building remained shut for approximately two weeks whilst major repairs were carried out, and further repair and refurbishment work carried on for a number of weeks after that.

15 May 2024: the Shipley Site

92. On 15 May 2024, at approximately 4.30am, four individuals gained access to the roof at the Shipley Site and once again caused damage to the roof; specifically, as can be seen in the photographs exhibited at **NJW-1/183 – 187**, the protestors smashed the top floor windows of the building and applied spray paint (the photographs also show the protestors on the roof of the building). The protestors also set off fireworks inside the building.

93. I also exhibit at **NJW-1/188 – 189** social media posts from Palestine Action which shows that the protestors (who are dressed in the familiar red overalls) are associated with Palestine Action.

94. The incident lasted for approximately seven hours and the emergency services attended the Shipley Site in significant numbers. West Yorkshire Police arrested the four protestors who gained access to the roof. Three of those persons have been released on bail: Ricky Southall, Amareen Afzal and Serena Fenton (all of whom have been named as Defendants to this Claim and Application). The fourth person remains on remand in custody. All four are charged with burglary with intent to commit damage, criminal damage to property and having an article with intent to destroy damage/property.

95. The protestors caused damage directly to the roof, surrounding windows and interior damage, incurring Teledyne UK the cost of approximately £68,000 to repair. Production was interrupted for one day causing a loss of revenue in excess of £60,000.

96. The site was shut during the incident and for the rest of 15 April 2024, but re-opened the following day.

5 July 2024: the Wirral Site

97. On 5 July 2024, at approximately 4.45am, three individuals gained access to the Wirral Site by ramming the vehicular access gates with a van, and then proceeded to spray red paint over the building. One of my colleagues at the Wirral Site was informed by police at the time that the protestors were live streaming their actions online. They also attempted to gain access to the roof of the premises with a ladder, but failed to do so.

98. I exhibit at **NJW-1/190 – 194** photographs which show the spray painted building, and the van abandoned inside the site (as well as two photographs of a protestor sitting on top of the van – they appear to be live streaming from their phone). I note that the protestor is wearing the red overalls associated with Palestine Action.

99. I also exhibit at **NJW-1/195 – 197** social media posts from Palestine Action, which confirm that the protestors were associated with this group.

100. The incident lasted for approximately four hours, and Merseyside Police attended and arrested the three protestors. At this time, I do not know what these persons have been charged with, or what their names are (as I explain below, that information is being sought from Merseyside Police). I do however know that they are currently on bail and awaiting a court date for trial.

101. The protestors caused damage to the gate and paint damage to the site, incurring Teledyne UK costs of approximately £1,000 to repair. Production was interrupted briefly, causing a loss of revenue of approximately £6,400.

2 October 2024: the Wirral Site

102. On 2 October 2024, at approximately 5.55am, three individuals gained access to the Wirral Site and climbed onto the roof of the premises. They caused damage to the roof,

as well as to the production floor in the building underneath, including by the use of red paint.

103. I exhibit at **NJW-1/198 – 201** photographs of the roof and production floor, which show the damaged caused by the protestors.

104. I also exhibit at **NJW-1/202 – 204** social media posts from Palestine Action, which shows that the protestors were associated with that group. These posts show how the actions of the protestors were targeted and intended to cause maximum disruption. In particular, the text accompanying the pictures of the damage caused explains that protestors had accessed the 'clean room' at the site, the contamination of which could stop production for up to 12 months, and disrupt production for 18 months. Palestine Action had come by that information as it was contained in a witness statement that had been given by a senior employee of Teledyne UK during criminal proceedings; the protestors had clearly used that information to do maximum damage during the course of their protest.

105. The incident lasted for approximately five hours and Merseyside Police attended and arrested the three protestors. At this time, I do not know what these persons have been charged with, or what their names are (as I explain below, that information is being sought from Merseyside Police). I do however know that they are currently on bail and awaiting a court date for trial.

106. The protestors caused damage to the roof and to the machinery in the rooms below the roof, incurring Teledyne UK costs to date of approximately £148,000 to repair, with a further £335,000 expected to be spent on a permanent roof repair. Production was interrupted, causing a loss of revenue of approximately £14,000.

30 October 2024: the Shipley Site

107. On 30 October 2024, the entrance gate to the Shipley Site was obstructed by approximately 20 protestors. The protestors stood outside the gate and blocked access

to the site (remembering that the Shipley Site has only this single point of access), whilst holding banners and placards.

108. The blockade lasted for around five hours, between 6.30am and 11.30am, during which time employees were unable to get through the gates and onto the site. The working day and business at the Shipley Site were therefore significantly disrupted on this day, with half a working day lost by reason of the protest. During blockade actions such as this one on 30 October, approximately 100 staff members are unable to access the site and carry on work, daily factory deliveries and collections are missed, staff members feel intimidated just by reason of arriving at their place of work, and 10-20 police officers are diverted from other duties to respond to a blockade. Depending on shipping schedules, up to £90,000 of revenue can be put at risk.

109. The protest appears to have been carried out by those who associate with the group known as Bradford Friends of Palestine. I have reviewed the Instagram page for that group and can see that a short video was posted on 30 October 2024, which shows protestors standing outside the gate to the Shipley Site, obstructing access. The protestors are wearing face and/or head coverings of various descriptions, or look away from the camera as it pans around, such that it is not possible to identify those who were present. I exhibit at **NJW-1/205 – 209** some still images of the video which show what I have here described.

110. During the protest, a female dressed in all dark clothing and wearing a face covering attached a poster to the fence at the Shipley Site. That poster had attached to it sharp lids of tin cans. I exhibit at **NJW-1/210** a still CCTV image of this person. Given her all dark clothing, face covering and the quality of the CCTV image, it is impossible to identify this person.

111. West Yorkshire Police attended the Shipley Site and eventually moved the protestors away from the gate to the site; the protestors had been in front of the gate for some five hours before they were moved away from the gate. To my knowledge, no arrests were made.

20 November 2024: the Shipley Site

112. On 20 November 2024, the entrance gate to the Shipley Site was obstructed by approximately 12 protestors. The protestors stood outside the gate and were chanting, singing and dancing, and obstructed access to the site.

113. The protest lasted for approximately 2 hours, between 12 noon and 2pm. During this time, access to the site was disrupted, although the impact was less severe than the protest on 30 October as a result of the shorter duration. That said, employees did still experience delays entering the site, which caused some inconvenience and loss of productivity during the working day.

114. The protest appears to have been carried out by those associated with Bradford Friends of Palestine. I exhibit at **NJW-1/211 – 217** a post made to the group's Instagram account, which documents the incident.

115. The West Yorkshire Police attended the site to manage the situation. To my knowledge, no arrests were made, but the Police did prohibit the filming and taking of photographs by the protestors given the status of the Shipley Site as a 'prohibited place' under the National Security Act 2023.

28 November 2024: the Shipley Site

116. On 28 November 2024, the entrance gate to the Shipley Site was again blockaded. On this occasion, a group of approximately 20 protestors attended the site and obstructed the gate and therefore access to the site. This blockade lasted for approximately three hours, between 6am and 9am. Consequently, and fortunately, this meant that the working day was not as disrupted as it had been by the earlier blockade on 30 October, as employees were able to access the site shortly after the time that they ordinarily would on a working day.

117. I understand from a colleague that the protestors who engaged in this protest were associated with Bradford Friends of Palestine, although I am also told that a group called 'Yorkshire Palestine Collective' have expressed solidarity with the incident in

various social media posts on 29 November 2024. Prior to this protest incident, neither I nor the other members of management at Teledyne UK were aware of this group. I have searched online for this group and exhibit at **NJW-1/218 – 238** the social media posts by the Yorkshire Palestine Collective, which records the incident. As with earlier incidents of this nature, most of the protestors are wearing face and/or head coverings.

118. The blockade lasted for some three hours. After being warned about their actions by officers from the West Yorkshire Police (who attended the site to manage the situation), the protestors were eventually shepherded away from the gate, without any significant resistance.

119. To my knowledge, no arrests were made, but the Police did prohibit the filming and taking of photographs by the protestors given the status of the Shipley Site as a 'prohibited place' under the National Security Act 2023.

THE DEFENDANTS TO THIS CLAIM AND APPLICATION

120. Teledyne UK has (at this time) named seven Defendants, and defined four categories of Persons Unknown (the latter of which are tied to and reflect the relevant causes of action).

Named Defendants

121. Each of the Named Defendants has attended one of Teledyne UK's sites throughout 2024 and engaged in an act of unlawful direct action protest, for which they were arrested. As a result of those recent acts of protest, Teledyne UK reasonably apprehends that these persons may re-attend Teledyne UK's sites and engage in further acts of direct action protest; these people are clearly currently active direct action protestors, with an interest in protesting against Teledyne UK's business. A summary of the Named Defendants is as follows:

i. **Julian Allen Gao** – arrested at the Shipley Site on 2 April 2024 for having accessed the roof of the premises on site. Mr Gao was charged with damaging property, and possession of articles with intent to destroy or damage property, and was tried for

these offences in September 2024, which resulted in a hung jury. A re-trial has been set for February 2026;

ii. **Ruby Hamill** – arrested at the Shipley Site on 2 April 2024 for having accessed the roof of the premises on site. Ms Hamill was charged with damaging property, and possession of articles with intent to destroy or damage property, and was tried for these offences in September 2024, which resulted in a hung jury. A re-trial has been set for February 2026;

iii. **Daniel Jones** – arrested at the Shipley Site on 2 April 2024 for having accessed the roof of the premises on site. Mr Jones was charged with damaging property, and possession of articles with intent to destroy or damage property, and was tried for these offences in September 2024, which resulted in a hung jury. A re-trial has been set for February 2026;

iv. **Najam Shah** – arrested at the Shipley Site on 2 April 2024 for having accessed the roof of the premises on site. Mr Shah was charged with damaging property, and possession of articles with intent to destroy or damage property, and was tried for these offences in September 2024, which resulted in a hung jury. A re-trial has been set for February 2026;

v. **Ricky Southall** – arrested at the Shipley Site on 15 May 2024 for having accessed the roof of the premises on site. I believe that Mr Southall is currently on bail;

vi. **Amareen Afzal** – arrested at the Shipley Site on 15 May 2024 for having accessed the roof of the premises on site. I believe that Ms Afzal is currently on bail;

vii. **Serena Fenton** – arrested at the Shipley Site on 15 May 2024 for having accessed the roof of the premises on site. I believe that Ms Fenton is currently on bail.

122. As mentioned above, there were in fact four protestors who were arrested at the Shipley Site on 15 May 2024 for having accessed to the roof of the premises. However, the fourth protestor has not been named as a defendant to these proceedings; that is because they remain on remand in custody, such that Teledyne UK does not reasonably

apprehend that they will re-attend its sites at this time, because they are not at liberty to do so.

123. Teledyne UK has elected not to name as defendants those persons who were arrested in relation to protest incidents at its sites throughout 2022 and 2023. That is because none of those persons have re-attended Teledyne UK's sites since those incidents, nor does Teledyne UK have any current knowledge of the status or whereabouts of these persons (including whether they continue to be involved in acts of direct action protest in support of the Palestine Action cause, or other similar cause). As such, Teledyne UK does not reasonably apprehend that those persons will re-attend its sites at this time.

124. No arrests were made in relation to the protests outside the Shipley Site during which access to the site was blocked on 30 October and 20 and 28 November 2024. As such, Teledyne UK has not been able to obtain any of the names of those protestors, such that they could become named defendants to this Claim and Application. Further, as I have explained above, clear images of the protestors engaging in alleged unlawful acts were not obtained (with most wearing face and/or head coverings of some description to conceal their identities), such that identification of these persons and joining them to the proceedings by way of photograph is not practicable (it would be impossible to tell if any future protestor attending a Teledyne UK site was one of those who had previously attended and concealed their identity).

Applications under CPR 31.17

125. As is clear from my earlier explanations of the unlawful protest incidents that have occurred at Teledyne UK's sites, six protestors were arrested at the Wirral Site on 5 July and 2 October 2024. Teledyne UK is not aware of the names of those protestors, yet understands that they are persons who might properly be added to this Claim as named defendants. With that in mind, both I and the solicitors for Teledyne UK have approached the Merseyside Police to obtain the names and addresses (and other contact details) of the persons arrested, to enable their identification and service in these proceedings. Unfortunately, Merseyside Police are unable to share that information without a court order. Accordingly, at the time of finalising this statement, the solicitors for Teledyne UK are in the process of preparing an application pursuant to CPR 31.17

to secure the disclosure of the names and addresses of the arrestees. It is hoped that an order can be secured in advance of the return date hearing of these injunction proceedings, and that Teledyne UK will have had sufficient time to act on the information obtained (if so advised).

126. Further, solicitors for Teledyne UK are, at the time of finalising this statement, also preparing a CPR 31.17 application in relation to information held by the West Yorkshire Police. Specifically, whilst Teledyne UK has the names of those persons who were arrested at the Shipley Site in 2024, it does not have any address or contact details for those persons to assist with service. Teledyne UK are seeking that disclosure (as well as confirmation that the names of the First to Seventh Defendants are correct).

127. Counsel will update the court as to the status of these disclosure Applications at the hearing of the Application for interim injunctive relief.

Persons Unknown

128. Teledyne UK also seeks relief against various defined categories of Persons Unknown. Those categories are defined so that they are tied to the causes of action relied upon and the conduct that Teledyne UK seeks to prohibit. Specifically, those categories are:

i. 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).

ii. 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;

iii. 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);

iv. 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.

129. A Persons Unknown injunction is required because, as is evident from the above in relation to the protests at the Shipley Site on 30 October and 20 and 28 November 2024, it has not been possible to name all those persons who have attended, and may attend, Teledyne UK's sites and protest in a way that is unlawful.

130. Further, it is impossible for Teledyne UK to name all those persons who may in the future attend Teledyne UK's sites and engage in unlawful acts of protest. This is especially the case in circumstances where Palestine Action (that being one of the key groups with which Teledyne UK is concerned, and certainly the most extreme of the groups with which Teledyne UK is concerned) continues to recruit new activists to its cause and host direct action training days. There appears to be an ever increasing and changing cast of activists, who it is impossible to identify. Further, as I have explained above, Palestine Action advise and instruct its activists as to how to conceal their identities and escape arrest; if that advice is followed with success, Teledyne UK would not ever be in a position to be able to identify and name as defendants all those persons

who attend, or may attend, Teledyne UK's site and engage in acts of unlawful direct action protest.

APPREHENSION OF FUTURE PROTEST AND HARM

131. Absent the injunctive relief sought, Teledyne UK reasonably apprehends that it will experience further acts of protest in the same nature as those which have already been experienced. As I have set out above, many of those protests (but not all) have been unlawful and aggravated, with resulting harm.

132. Specifically, Teledyne UK reasonably apprehends imminent future acts of unlawful protest by reason of:

i. The past acts of unlawful protest that have been suffered, and the increasing frequency of those acts of protest throughout 2024;

ii. The continuing activity and recruitment of activists by groups such as Palestine Action, and the programme of direct action training run by that group;

iii. The instruction and encouragement of unlawful acts of direct action protest through mechanisms such as the aforementioned Underground Manual (Palestine Action). Specifically, every suggested act of protest in that manual is unlawful and includes acts of trespass and criminal damage;

iv. The continuing deterioration of the situation and conflict in the Middle East, which is the cause with which the activists who target Teledyne UK are concerned;

v. The imminent Christmas holiday period. Typically, people are not at work over this period and have more disposable time. When taken with the above factors, it seems likely that Teledyne UK will experience further acts of protest over this period, as protestors will have the time available to engage in such acts. Indeed, an incident occurred at the Shipley Site on Boxing Day 2023. Further, the incident at the Shipley Site on 2 April 2024 occurred during the Easter vacation period (2 April

being the Tuesday after Easter Monday), and the incident on 30 October 2024 occurred during the October school half-term holiday.

133. Further, Teledyne UK reasonably apprehends that harm will be suffered as a result of the apprehended acts of protest. The apprehended harm is in the same nature as the harms that have previously been suffered by reason of past acts of unlawful protest and include (but are not limited to):

i. Property damage (caused by acts of trespass and aggravated trespass). As set out above, Teledyne UK has incurred significant repair and clean up costs following acts of trespass by protestors. Those losses are not sustainable. To date, and as set out above, the cumulative loss in this regard is in excess of £2.25m, with that figure expected to increase as the Wirral Site continues to undergo repairs;

ii. Disruption to business and operational losses. Teledyne UK cannot operate its business at its sites when unauthorised persons are trespassing on site. In many instances, it would not be safe to do so, and in other instances it would not be prudent to do so given the sensitivity of the business operations. Therefore, trespassers impact significantly on Teledyne UK's ability to go about its day-to-day business. Further, when damage has been caused by trespassing protestors, further disruption to the business is caused by the clean up operation, and sometimes also by reason of areas of the site being out of action until repairs can be undertaken. Further still, in instances where access to the site is blocked and staff cannot access the site, clearly the day-to-day business of that site is also disrupted;

iii. Further, and as described above, Teledyne UK's sites form a critical part of the UK defence supply chain. Disruption to production at these sites can weaken the UK's ability to protect its security and can place serving personnel at risk.

MITIGATION OF THE APPREHENDED HARM

134. Teledyne UK has comprehensive and sophisticated security arrangements in place across its sites to help guard against acts of unlawful protest (especially acts of trespass), and mitigate the loss and harm that is suffered when such acts do occur. Some

of those arrangements are long standing, whilst others have been put in place and/or enhanced in more recent times in response to the harmful acts of protest that have been suffered. These arrangements include:

i. Manned guarding of sites;
ii. Guard dogs;
iii. Paths for patrolling and access;
iv. Razor wire;
v. Fencing lines;
vi. Anti-climb devices;
vii. Internal door strengthening;
viii. Internal door locks;
ix. Steel external doors;
x. CCTV cameras;
xi. Intruder detection systems;
xii. Internal structural hardening (walls and ceilings);
xiii. Secure rooms upgraded to the latest Ministry of Defence standards.

135. In the interests of full and frank disclosure I should say that not every site has all of the above measures in place. The measures that are in place at any given site depends on the nature of the site and its topography, the work undertaken at the site and the resources at and physical capability of the buildings at the site. However, as I am sure the court will appreciate, it is not prudent for me to explain in a public document exactly which measures are in place at which site.

136. The cost to Teledyne UK for putting in place the variety of additional security measures, including the additional guarding, is estimated to be in the region of $2.7m for the 2024 financial year

137. A number of Teledyne UK sites have "Prohibited Site" signage in accordance with the National Security Act 2023. That Act provides the police with powers to deter, capture, and prosecute harmful activity in and around prohibited places. These powers include ordering a person to cease their activity or move away from the place. Prohibited places include "*any land or building in the United Kingdom … which is used for the purposes*

... of the activities of the armed forces of the Crown...or.. the invention, development, production, operation, storage or disposal of weapons or other equipment or capabilities of those forces and research relating to it" (see section 7). Teledyne UK's sites that are involved in the production of components used by the UK's armed forces are prohibited places.

138. UK defence suppliers, such as Teledyne UK, are not required to register their premises as a prohibited place, but they are advised to place signage outside to inform the public. Teledyne UK has done this at those of its sites that fall within the definition of a prohibited place.

139. Finally, when Teledyne UK received the intelligence of the protest planned at the Chelmsford Site for 8 December 2024, additional temporary fencing was placed at the front the site (which adjoins the pavement) to clearly mark where the boundary to the site is. It was hoped that the fencing would prevent and deter acts of trespass in connection with the protest. That fencing has now been removed, but will be re-installed in advance of the re-scheduled protest.

CONCLUSION

140. I respectfully asked that the court grants the relief set out in the draft Order. It is clear that the criminal law alone is not an adequate deterrent to acts of unlawful protest, and Teledyne UK cannot sustain the losses that it has been incurring by reason of acts of unlawful protest at its sites.

Statement of Truth

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

.....

Nicholas James Wargent
Dated this 13 day of December 2024

IN THE HIGH COURT OF JUSTICE **CLAIM NO.**
KING'S BENCH DIVISION

B E T W E E N :

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

EXHIBIT NJW-1

This is Exhibit NJW-1 referred to in the First Witness Statement of Nicholas James Wargent.

The electronic official copy of the register follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.

Official copy of register of title

Title number WYK387275 | Edition date 17.05.2021

- This official copy shows the entries on the register of title on 10 SEP 2024 at 13:18:41.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 10 Sep 2024.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Nottingham Office.

A: Property Register

This register describes the land and estate comprised in the title.

WEST YORKSHIRE : BRADFORD

1 (01.06.1977) The Freehold land shown edged with red on the plan of the above Title filed at the Registry and being Land lying to the south east of Otley Road, Charlestown, Shipley.

2 The land has the benefit of the following rights reserved by but is subject to the following rights granted by a Conveyance of the land tinted brown on the filed plan dated 26 March 1975 made between (1) Finchdale Investments Limited and (2) Don Brennan & Sons Limited:-

TOGETHER ALSO WITH a right (in common as aforesaid) to use the pipes drains sewers wires and cables now laid or within the aforesaid period to be laid under through or over the adjoining land of the Vendor subject to the payment of a proportionate part of the cost of maintenance and repair thereof and a right of entry upon such adjoining land in connection with the exercise of such rights the Purchaser causing the minimum damage in the exercise of such rights and making good any damage caused thereby EXCEPTING AND RESERVING NEVERTHELESS unto the Vendor and its successors in title the owners and occupiers for the time being of the remaining part of the Vendor's Airedale Park Estate aforesaid or any part or parts thereof the like right to connect into and to use the pipes drains sewers wires and cables now laid or within the said period to be laid under through or over the property hereby conveyed subject to contribution as aforesaid and EXCEPTING AND RESERVING as aforesaid all necessary rights of entry upon the property hereby conveyed in connection with the exercise of the rights hereinbefore reserved causing the minimum damage in the exercise of such rights and making good any damage caused thereby.

3 The land has the benefit of the following rights reserved by a Transfer of the land tinted blue on the filed plan dated 4 February 1980 made between (1) Centregate Properties Limited and (2) The Royal London Mutual Insurance Society Limited:-

EXCEPT AND RESERVING unto the Transferors and their successors in title owners and occupiers for the time being of the remaining part of the Transferors' Airedale Park Estate aforesaid or any part or parts thereof:-

(i) the like right to connect into and use the pipes drains sewers

A: Property Register continued

wires and cables now laid or within the aforesaid area to be laid under through or over the property hereby transferred subject to contribution as aforesaid

(ii) all necessary rights of entry upon the property hereby transferred in connection with the exercise of the rights hereinbefore reserved causing the minimum damage in the exercise thereof and making good any damage caused thereby.

4 By a Deed dated 1 February 1982 made between (1) Healthilife Limited (Healthilife) (2) Centregate Properties Limited (Centregate) (3) GTE Sylvania Limited (Sylvania) (4) Barclays Bank Limited (5) Guinness Mahon & Co. Limited (Guinness) and (6) The Royal London Mutual Insurance Society Limited (RLM) the benefit of the rights reserved by the Conveyance dated 26 March 1975 referred to above was extinguished as to the following extent:

"Centregate as Beneficial Owner, Guinness as Mortgagees and RLM as Beneficial Owner (to the extent that it is entitled to the same) hereby release to Sylvania the right to use services referred to in the Fourth Schedule hereto so far as the same relates to or affects the Pink Land to the intent that in relation to the Pink Land the right to use the services shall henceforth cease and be extinguished".

NOTE 1: The rights contained in the Fourth Schedule repeat the exceptions and reservations set out from the Conveyance dated 26 March 1975 referred to above

NOTE 2: The pink land referred to is hatched in red on the filed plan.

5 The land has the benefit of the following rights granted by a Transfer of the land in this title dated 25 February 1987 made between (1) GMI Construction Group Limited (2) Centregate Properties Limited (Transferor) and (3) Filtronic Components Limited (Transferee):-

"TOGETHER WITH the rights set out in Part 2 of the Schedule hereto

THE SCHEDULE BEFORE REFERRED TO

PART 2

Rights granted to the Transferee

The right in common with others entitled to the like right to connect into and use the pipes drains sewers wires and cables now laid or within a period of twenty one years from the date hereof to be laid through or over the adjoining land of the Transferor subject to the payment of a fair and reasonable proportion of the cost of maintenance and repair thereof and a right of entry upon such adjoining land in connection with the exercise of such rights the Transferee causing the minimum damage in the exercise thereof and making good damage caused thereby to such adjoining land"

6 (07.08.2008) A new title plan based on the latest revision of the Ordnance Survey Map has been prepared.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

1 (17.05.2021) PROPRIETOR: TELEDYNE UK LIMITED (Co. Regn. No. 00432014) of 106 Waterhouse Lane, Chelmsford CM1 2QU.

2 (17.05.2021) The price stated to have been paid on 10 May 2021 was £798,459.

3 (17.05.2021) A Transfer dated 10 May 2021 made between (1) Teledyne Limited and (2) Teledyne UK Limited contains purchaser's personal

B: Proprietorship Register continued

covenants.

NOTE: Copy filed.

C: Charges Register

This register contains any charges and other matters that affect the land.

1 A Conveyance of the land tinted pink on the filed plan and other land dated 26 April 1973 made between (1) Woolcombers Limited (Vendor) and (2) Finchdale Investments Limited (Purchaser) contains the following covenants:-

"THE Purchaser hereby covenants with the Vendor so as to bind so far as may be the property hereby conveyed into whosesoever hands the same may come and so that this covenant shall be for the benefit of the Vendors property specified in the First Schedule hereto that the Purchaser and its successors in title will not use or permit the use of the property hereby conveyed or any part thereof for the purpose of woolcombing and will not install any combs or ancillary machinery for the combing of wool in or upon any part of the said property.

.....
..

THE FIRST SCHEDULE

Greenside Combing Company Greenside Lane Fairweather Green Bradford."

2 The land is subject to the following rights granted by a Transfer of the land tinted yellow on the filed plan dated 19 February 1980 made between (1) Centregate Properties Limited and (2) GTE Sylvania (GB) Limited:-

"TOGETHER WITH

.....
..

(ii) a right in common as aforesaid to use the pipes drains sewers wires and cables now laid or within a period of twenty one years from the date hereof to be laid under through or over the adjoining land of the Transferor subject to the payment of a proportionate part of the cost of maintenance and repair thereof and a right of entry upon such adjoining land in connection with the exercise of such rights the Transferee causing the minimum damage in the exercise thereof and making good any damage caused thereby."

3 (02.10.2009) The parts of the land thereby affected are subject to the rights granted by a Lease of an electricity substation dated 28 September 2009 referred to in the schedule of leases hereto.

The said deed also contains restrictive covenants by the grantor.

NOTE: Copy lease filed under WYK910237.

4 (02.10.2009) The parts of the land affected thereby are subject to the leases set out in the schedule of leases hereto.
The leases grant and reserve easements as therein mentioned.

Schedule of notices of leases

	Registration date and plan ref.	Property description	Date of lease and term	Lessee's title
1	02.10.2009 edged and numbered 1 in blue	electricity substation, Acorn Park	28.09.2009 60 years from 28 September 2009	WYK910237

Schedule of notices of leases continued

Registration date and plan ref.	Property description	Date of lease and term	Lessee's title
NOTE: See entry in the Charges Register relating to the rights granted by this lease.			

End of register

Land Registry

10 September 2024

Your ref
TEL14.23

Our ref
WYK387275/OC/113

HM Land Registry
Durham Office
PO Box 75
Gloucester
GL14 9BD

DX 321601 Gloucester 33
Tel 0300 006 0010
Fax NA
Email durham.office@
landregistry.gov.uk
www.gov.uk/land-registry

Official copy/copies

HM Land Registry payment ref 10/09 Z0NE3PNF
Fee debited £3.00

The official copy/copies of the title plan or certificate in form CI you applied for is/are enclosed.

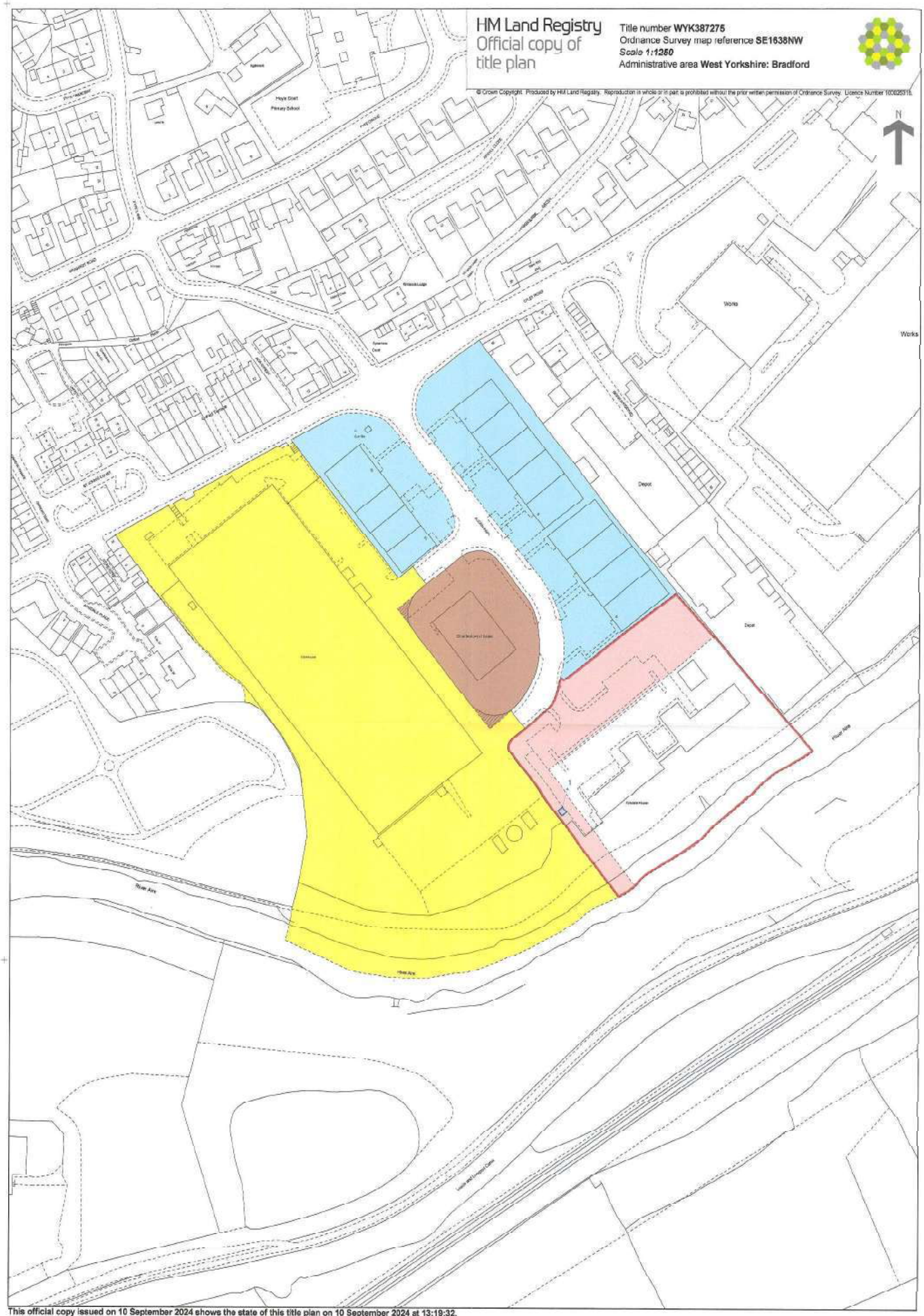
You did not apply for an official copy of the register.

Please contact the HM Land Registry Office named if you have any questions about the enclosed official copy/copies.

TEL14.23

KEYSTONE LAW LTD
DX 193
Chancery Lane

0352005002



This official copy issued on 10 September 2024 shows the state of this title plan on 10 September 2024 at 13:19:32.
It is admissible in evidence to the same extent as the original (s.67 Land Registration Act 2002).
This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground.
This title is dealt with by HM Land Registry, Durham Office.

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Title Number: WYK387275

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Plotted Scale - 1:1250. Paper Size – A4

Title Number: WYK387275

The electronic official copy of the register follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.

Official copy of register of title

Title number MS575234 | Edition date 26.07.2021

- This official copy shows the entries on the register of title on 08 OCT 2024 at 11:48:39.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 08 Oct 2024.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Birkenhead Office.

A: Property Register

This register describes the land and estate comprised in the title. Except as mentioned below, the title includes any legal easements granted by the registered lease but is subject to any rights that it reserves, so far as those easements and rights exist and benefit or affect the registered land.

MERSEYSIDE : WIRRAL

1 (07.07.2010) The Leasehold land shown edged with red on the plan of the above title filed at the Registry and being Unit A, Tebay Retail Park, Tebay Road, Bromborough, Wirral.

NOTE: The land tinted green on the title plan is not included in the title.

2 (07.07.2010) The title includes any legal easements referred to in clause LR11.1 of the registered lease but is subject to any rights that are granted or reserved by the lease and affect the registered land.

3 (07.07.2010) The land has the benefit of the rights granted by but is subject to the rights reserved by the Conveyance dated 12 January 1990 referred to in the Charges Register.

4 (07.07.2010) The land has the benefit of the rights granted by but is subject to the rights reserved by the Transfer dated 4 December 2009 referred to in the Charges Register.

5 (07.07.2010) The Transfer dated 4 December 2009 referred to in the Charges Register contains a provision excluding the operation of section 62 of the Law of Property Act 1925 and other matters as therein mentioned.

6 (07.07.2010) Short particulars of the lease(s) (or under-lease(s)) under which the land is held:
Date : 24 June 2010
Term : 15 years from 4 June 2010
Parties : (1) Redsun Developments Limited
(2) C.M.L Group Limited

7 (07.07.2010) The Lease prohibits or restricts alienation.

8 (07.07.2010) The landlord's title is registered.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

1 (11.05.2021) PROPRIETOR: TELEDYNE UK LIMITED (Co. Regn. No. 00432014) of 106 Waterhouse Lane, Chelmsford CM1 2QU.

2 (07.07.2010) RESTRICTION: No transfer of the registered estate by the proprietor of the registered estate or by the proprietor of any registered charge is to be registered without a certificate signed by a conveyancer that the provisions of of clauses 20.2 and 20.3 of the registered lease have been complied with.

3 (11.05.2021) RESTRICTION: No disposition of the registered estate (other than a charge) by the proprietor of the registered estate or by the proprietor of any registered charge, not being a charge registered before the entry of this restriction, is to be registered without a certificate signed by a conveyancer that the provisions of clause 2.2 of a Deed of Covenant dated 10 May 2021 made between (1) Teledyne UK Limited and (2) Ministry of Housing Communities and Local Government have been complied with.

4 (11.05.2021) A Transfer of the land in this title dated 29 December 2013 made between (1) Teledyne C.M.L. Group Limited and (2) Teledyne Limited contains purchasers personal covenant(s).

NOTE: Copy filed.

The Transfer to the present proprietor(s) contains a covenant to observe and perform the aforesaid covenant(s) and of indemnity in respect thereof.

C: Charges Register

This register contains any charges and other matters that affect the land.

1 (07.07.2010) The land in this title is with other land unknown subject to a perpetual yearly rentcharge of £4.10s.0d. created by a Deed of unknown date and parties mentioned in the Conveyance dated 29 May 1908 referred to below. The Conveyance states that the rentcharge is payable to the poor of the Townships of Bromborough and Brimstage but no other particulars were supplied on first registration.

By the Conveyance dated 12 January 1990 referred to below the land in this title was informally exonerated from this rentcharge.

2 (07.07.2010) A Conveyance of the freehold estate in the land in this title and other land dated 29 May 1908 made between (1) Lever Brothers Limited (2) Bromborough Port Estate Limited contains the following covenants:-

COVENANT by the Purchasers with the Vendors:-

That no works or buildings should at any time be erected or used for the manufacture or sale of soap upon any part of the lands and hereditaments thereby assured except such part as might be sold under the provisions of an Agreement not the subject of this Abstract and that the business of a soap-maker or perfumer not to be carried on upon any part of said land and hereditaments.

3 (07.07.2010) A Conveyance of the freehold estate in the land in this title and other land dated 18 December 1956 made between (1) Unilever Limited (2) The Board of Trade contains covenants details of which are set out in the schedule of restrictive covenants hereto.

4 (07.07.2010) The land is subject to the following rights granted by a Conveyance of Factory BT341/21 on the Old Hall Estate dated 30 July 1987 made between (1) The English Industrial Estates Corporation (2) Magnet Joinery & Timber Limited:-

C: Charges Register continued

"TOGETHER WITH the rights set out in the First Schedule hereto

THE FIRST SCHEDULE above referred to

(Rights Granted)

(i) Full and free right and liberty for the Purchaser in common with the Vendor and all other persons having the like right but subject to all easements which may have been or may hereafter be granted by the Vendor (the Vendor agreeing that any easements which may hereafter be granted shall not result in the obstruction of or interference with the right and liberty of passing and repassing hereinafter mentioned) upon over or under the private road of the Vendor on the Estate known as Tebay Road at all times and for all purposes connected with the use and enjoyment of the Property with or without motors or other vehicles laden or unladen to pass and repass over and along the said private road known as Tebay Road

(ii) Liberty to enter on the remainder of the Estate adjacent to the Property for the purposes of compliance with any of the covenants conditions and stipulations hereinafter contained and on the part of the Purchaser to be observed or performed making good all damage occasioned by such entry and taking all precautions to avoid obstruction to or interference of the Estate

(iv) The free and uninterrupted right (in common with the Vendor and all other persons having the like right) of running of water soil gas and electricity and any other services or supply from and to the Property and all buildings erected thereon through along or under (including (but without disturbing any buildings or erections now standing on the remainder of the Estate) the right to connect into) all sewers watercourses channels water and gas pipes electric and other wires flues drains and other services and conducting media now or at any time within eighty years of the date of the Conveyance to the Purchaser made in on or under all parts of the remainder of the Estate as afford service or benefit for the Property together with all easements rights and privileges necessary and property (but without disturbing any buildings or erections now standing on the remainder of the Estate) for laying making inspecting cleansing repairing and reinstating the same (the person exercising such rights making good at his own expense all damage caused in the exercise of such rights) provided that the Vendor may at any time without incurring any liability to the Purchaser stop up alter remove or make connections to the said sewers watercoarses channels water and gas pipes electric and other wires flues drains and other services and conducting media subject to an obligation on the part of the Vendor to supply the Purchaser with suitable alternative services

(v) The right of support for the Property from all parts of the remainder of the Estate

(vi) The right after reasonable notice and at reasonable times (except in the case of emergency) to enter upon the remainder of the Estate for the purpose of executing any works on or in connection with the Property or any part thereof which cannot otherwise be conveniently executed (the person exercising such rights causing as little inconvenience as possible and making good at his own expense all damage caused in the exercise of such rights)

(vii) The right with or without workmen at all reasonable times and after reasonable notice (except in the case of an emergency) to enter upon the remainder of the Estate for the purpose of maintaining repairing renewing altering or amending any fences walls buildings or works on all parts of the Property (the person exercising such right causing as little inconvenience as possible and making good at his own expense all damage caused in the exercise of such right)

5 (07.07.2010) A Conveyance of the freehold estate in the land in this title dated 12 January 1990 made between (1) The English Industrial Estates Corporation (2) The Morgan Crucible Company plc contains restrictive covenants.

C: Charges Register continued

NOTE: Copy filed under MS299602.

6 (07.07.2010) By a Deed dated 8 February 2007 made between (1) Thermal Ceramics UK Limited and (2) Henry Boot Developments Limited the rights granted by the Conveyance dated 30 July 1987 referred to above were varied as therein mentioned.

NOTE: Copy Filed under MS259869.

7 (07.07.2010) By a Deed dated 9 March 2009 made between (1) UML Limited and (2) Thermal Ceramics UK Limited the covenants contained in the Conveyances dated 29 May 1908 and 18 December 1956 referred to above were expressed to be released.

NOTE:-Copy filed under MS299602.

8 (07.07.2010) The land is subject to the easements granted by a lease dated 1 May 2009 of an electricity substation for a term of 99 years .

The said deed also contains restrictive covenants by the grantor.

NOTE: Copy lease filed under MS563827.

9 (07.07.2010) A Transfer of the freehold estate in the land in this title dated 4 December 2009 made between (1) Thermal Ceramics Uk Limited and (2) Redsun Developments Limited contains restrictive covenants.

NOTE: Copy filed under MS570108.

Schedule of restrictive covenants

1 (07.07.2010) The following are details of the covenants contained in the Conveyance dated 18 December 1956 referred to in the Charges Register:-

"The Board for itself and its successors in title hereby COVENANTS with the Company to the intent that this covenant shall run with and bind the said property and every part thereof into whosesoever hands the same may come and to the intent that the benefit thereof may be annexed to and run with each and every part of the adjoining or neighbouring properties of the Company as follows:-

(i) Not to erect upon the said property any building without first obtaining the approval in writing of the Company its architect or surveyor (which approval shall not be unreasonably withheld or delayed) to plans showing the site of and the sections and elevations of the building to be erected thereon and only to erect any such building in conformity with such plans and the erection of any building without such previous approval or not in conformity with approved plans shall be deemed to constitute a continuing breach of this covenant until such time as plans shall be submitted and approved as aforesaid or until such building shall be made to conform with approved plans (as the case may be) and any building erected without such previous approval or which is not in confirmity with such approved plans shall forthwith be pulled down

or altered (as the case may be) upon the demand in writing of the Company

(ii) Not to alter the elevations of any building erected upon the said property without first obtaining the consent in writing of the Company its architect or surveyor (which consent shall not be unreasonably withheld or delayed) to such alterations and the alterations to any elevations to any building erectedther

eon without such consent shall be deemed to constitute a continuing breach of this covenant until such time as such consent shall be obtained and any alterations made without such consent shall upon the demand in writing of the Company br restored forthwith

Schedule of restrictive covenants continued

(iii) Not to use the said property or any building erected or to be erected thereon or permit or suffer the same or any part thereof to be used

(a) for the manufacture of or for thesale of or for dealing in any manner what

soever in soap or detergents of any description candles glycerine perfume toilet preparations or margarine edible fats cattle cake or cattle foods

(b) for an hotel or tavern or for the sale of beer wines or spirits PROVIDED that nothing in this clause contained shall apply to any building used as a works canteen or a sports or social club (wherein may be sold or consumed beer wines or spirits) maintained for the benefit of the employees of the owners or occupiers of the said property

(c) for the carrying on of any offensive noxious noisome or dangerous trade business manufacture or occupation or any trade business manufacture or occupation which shall or may be or become offensive objectionable injurious or dangerous to the Company or the owners or occupiers of any adjacent or neighbouring property or which shall or may involve the use of any process which gives off any offensive objectionable injurious or dangerous gas odour smoke or fumes

(iv) Not to do or suffer to be done on the said property or any building erected or to be erected thereon anything which shall or may be or become a nuisance or annoyance to the Company or to the owners or occupiers of any adjacent or neighbouring property

(v) Not to erect or exhibit or permit or suffer to be erected or exhibited upon the property or any part thereof or upon any building erected thereon any advertisment or advertisement hoarding whatsoever PROVIDED that nothing in this clause contained shall prevent the owner or occupier for the time being of the said property or any part thereof from exhibiting signs or advertisements relating exclusively to the trade or business carried on by such owner or occupier in or upon the said property or any part thereof or any building erected thereon or signs or notices relating to the sale or letting of the said property or any part thereof or any building to be erected thereon

(vi) Not to sink or permit or suffer to be sunk any well or wells on any part of the said property or bore or excavate in search of water or do or suffer to be done on the said property anything which may prejudice or cause damage to the water supply of the Company or of Lever Brothers Port Sunlight Limited or any company or companies associated with them.

End of register

These are the notes referred to on the following official copy

The electronic official copy of the title plan follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.

This official copy was delivered electronically and when printed will not be to scale. You can obtain a paper official copy by ordering one from HM Land Registry.

This official copy is issued on 08 October 2024 shows the state of this title plan on 08 October 2024 at 11:48:39. It is admissible in evidence to the same extent as the original (s.67 Land Registration Act 2002). This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground.
This title is dealt with by the HM Land Registry, Birkenhead Office .

HM Land Registry
Official copy of title plan

Title number **MS575234**
Ordnance Survey map reference **SJ3581NE**
Scale **1:1250**
Administrative area **Merseyside : Wirral**

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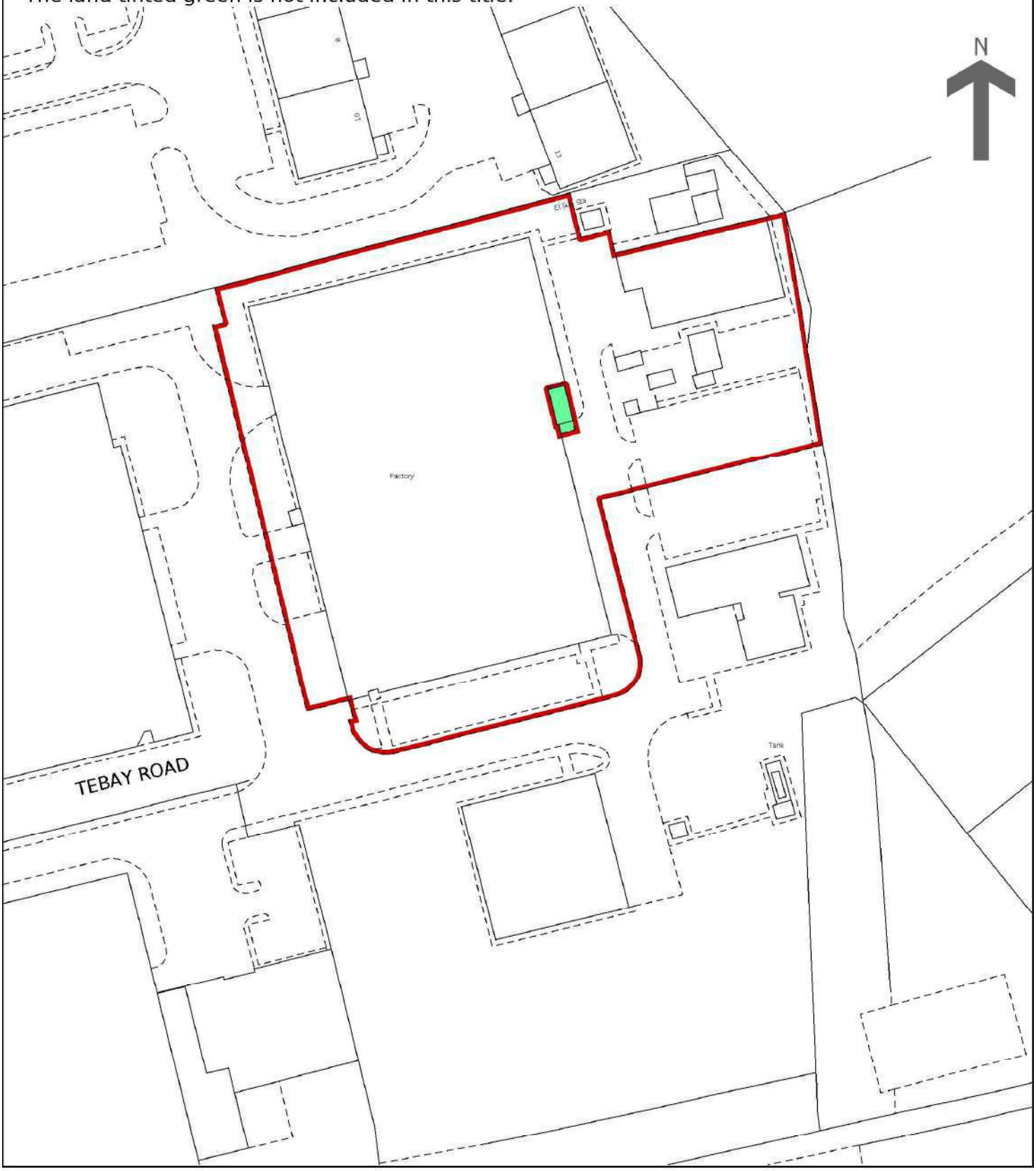
The land tinted green is not included in this title.



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Title Number: MS575234

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Title Number: MS575234

The electronic official copy of the register follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.

Official copy of register of title

Title number EX688035 | Edition date 12.08.2019

- This official copy shows the entries on the register of title on 08 OCT 2024 at 11:25:20.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 08 Oct 2024.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Peterborough Office.

A: Property Register

This register describes the land and estate comprised in the title.

ESSEX : CHELMSFORD

1 (05.08.2002) The Freehold land shown edged with red on the plan of the above title filed at the Registry and being 106 Waterhouse Lane, Chelmsford (CM1 2QU).

2 (05.08.2002) The land has the benefit of the following rights reserved by but is subject to the following rights granted by a Conveyance of the land tinted mauve on the filed plan dated 31 December 1967 made between (1) English Electric Valve Company Limited (Vendor) and (2) The Marconi Company Limited (Purchaser) :-

"TOGETHER ALSO with full and free right of way for the Purchaser and its successors in title owners or owner for the time being of the property hereby conveyed and their his or her servants visitors and licensees in common with all other persons now or hereafter entitled to the like right at all times hereafter by day or night with or without horses cattle or other animals carts waggons carriages traction engines motor cars motor lorries and other vehicles of any description for all purposes connected with the use and enjoyment of the property hereby conveyed or of any portion thereof for whatever purpose the same may from time to time lawfully be used and enjoyed over and along the roadway coloured green on the plan annexed hereto to pass and repass at all reasonable times but not to park or permit to be parked or to cause any other obstruction SUBJECT NEVERTHELESS and RESERVED unto the Vendor and its successors in title similar and like rights over the land coloured yellow"

NOTE: Copy plan filed.

3 (05.08.2002) The land has the benefit of the following rights reserved by a Conveyance of 110 Waterhouse Lane dated 14 March 1978 made between (1) English Electric Valve Company Limited (Vendor) and (2) Constance Rowena Strange (Purchaser):-

"Excepting and Reserving unto the Vendor and their successors in title the owner or owners and occupier or occupiers for the time being of the Vendors adjoining or neighbouring properties or any part or parts thereof:.....all other easements and quasi easements and rights which are or but for the common ownership would have been so used and enjoyed over the property hereby conveyed for the

A: Property Register continued

Benefit of the said adjoining properties and each and every part"

4 (05.08.2002) The land has the benefit of the following rights reserved by a Transfer of other land dated 7 June 1999 made between (1) Marconi Electronic Systems Limited (Vendor) and (2) Fairview New Homes (Chelmsford) Limited (Purchaser) :-

"excepting and reserving out of the Property the Exceptions and Reservations for the benefit of each and every part of the Retained Land

SCHEDULE 2 (The Exceptions and Reservations)

In this Schedule the definition of the Vendor shall be read as also including EEV Limited and its and their successors in title and assigns the owners and occupiers for the time being of the Retained land or any part thereof

1 The full and unrestricted right at any time hereafter and from time to time for the Vendor to erect and permit to be erected any buildings or other erections and to alter any buildings or other erections now standing or hereafter to be erected on any part of the Retained Land in such manner as to obstruct or interfere with the passage and access of light and air to any building which is or may be erected upon any part of the Property and so that all privileges of light or air now or hereafter to be enjoyed from any part of the Retained Land by or in respect of the Property shall be deemed to be so enjoyed by the licence or consent of the Vendor and not as of right

2.1 The full and unrestricted right for all purposes connected with the Retained land and each and every part thereof for the Vendor to the free and uninterrupted passage of Services through the existing Service Media which serve the Retained Land at the date of this Transfer or such other substituted Service Media as may within the Perpetuity Period be laid in under or over the property with the right at reasonable times and on reasonable written notice (except in emergency) for the Vendor to enter on the Property for the purposes of inspecting repairing renewing maintaining or cleansing the same the persons exercising such right causing as little damage as possible and making good any damage caused

2.2 The full and unrestricted right for all purposes connected with the Retained Land and each and every part thereof for the Vendor to connect up to any of the Service Media to be installed for the benefit of the Retained Land and every part thereof (such connections to be made only in the positions shown marked on Plan C) in under or over the Property within the Perpetuity Period or such other substituted Service Media as may within the Perpetuity Period be laid in under or over the property and thereafter the free and uninterrupted passage of Services through such Service Media with the right at reasonable times and on reasonable notice (except in emergency) for the Vendor to enter on the Property for the purposes of inspecting repairing renewing maintaining or cleansing the same the persons exercising such right causing as little damage as possible and making good any damage caused

3 The rights of support and shelter now enjoyed by any of the buildings or other structures upon the Retained Land

4 All rights to light and air enjoyed by the Retained Land over the Property notwithstanding that by reason of unity of ownership no such right previously existed

5 The full and unrestricted right at all times and for all purposes for the Vendor to drain water from the Retained Land or any part thereof into the drainage ditch the approximate position of which is shown by a red line on Plan B for the purposes of identification only together with the right to dig out and enlarge such ditch in such manner as the Vendor may require from time to time

6 The full and unrestricted right at all times and for the purposes of pedestrian and cycle access and for the purposes of repair and maintenance for the Vendor and those authorised by the Vendor to pass and repass between the Retained Land and the public cycle track over

A: Property Register continued

and along the bridges and accessways situated on the property in the locations shown for the purposes of identification only coloured pink on Plan B subject to the Vendor repairing and maintaining such bridges and accessway at the Vendor's own cost

NOTE 1: The following are the definitions referred to above:

"the First Property" Part of the Vendor's Land comprising land and buildings at Writtle Road Chelmsford shown edged red on Plan A for identification purposes only

"the Perpetuity Period" the period of 80 years from the date of this transfer

"the Property" the First Property and the Second Property

"the Retained Land" the land adjoining or neighbouring the Property retained by the Vendor and shown edged blue on Plan B for identification purposes only and the adjoining or neighbouring land of EEV Limited shown edged green on Plan B for identification purposes only

"the Second Property" the land and buildings shown coloured pink on Plan A annexed hereto for identification purposes only

"the Service Media" any drain sewer main wire cable watercourse conduit flue channel and other conducting media works pump or apparatus for the supply transmission or discharge of the Service

"the Services" gas electricity telecommunications water surface water or sewerage or any other services being supplied by or transmitted through or discharged from any of the Service Media.

NOTE 2: Copy plans filed under EX619559.

5 (05.08.2002) The land has the benefit of but is subject to the rights granted by a Deed dated 4 January 2002 made between (1) Marconi Applied Technologies Limited and (2) Ashtenne Land Limited. The said Deed also expresses to release the rights contained in the Conveyance dated 31 December 1967 referred to above.

NOTE: Original filed.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

1 (05.08.2002) PROPRIETOR: TELEDYNE E2V (UK) LIMITED (Co. Regn. No. 432014) of 106 Waterhouse Lane, Chelmsford CM1 2QU.

2 (12.08.2019) The proprietor's address for service has been changed.

C: Charges Register

This register contains any charges and other matters that affect the land.

1 (05.08.2002) A Conveyance of the land tinted yellow on the filed plan and other land dated 3 May 1935 made between (1) William Grose Webber and others (Vendors) and (2) William Smith Henderson (Purchaser) contains the following covenants:-

COVENANT by the Purchaser with the Vendors to the intent that the abstracting covenant should be binding so far as might be on the owners or owner for the time being of the hereditaments thereby assured but upon the Purchasers only so long as they were the owners of the same hereditaments that the Purchasers and the successors in title would at

C: Charges Register continued

all times thereafter observe and perform the several restrictions and stipulations set forth in the First Schedule thereto.

THE FIRST SCHEDULE therein above referred to

.....
..

2. The Purchaser shall not erect on the said piece or parcel of land a single house with domestic offices and outbuildings of less value than £450. Private dwellinghouses only with domestic offices and outbuildings shall be erected on the said piece or parcel of land.

3. The Purchaser shall not stand place or erect or allow to be stood placed or erected any hut tent caravan house on wheels or other chattel nor erect make place or use or allow to remain any show booth or roundabout on the said piece or parcel of land.

4. No gravel sand brick earth clay or soil shall be raised from the said piece or parcel of land or any part thereof except such as it shall be necessary to excavate for foundations of buildings or for the purpose of drainage cellarage or water supply.

5. The said piece or parcel of land shall not nor shall any part thereof be used as a road.

6. All dwellinghouses to be erected on the said piece or parcel of land shall front or face the said strip of land coloured yellow on the said plan and no dwellinghouse shall be built which shall front upon the flank of the said piece or parcel of land.

7. The Vendors reserve the right to waive alter modify or vary at any time as they may think fit the foregoing restrictions and stipulations in respect of the land retained by them.

NOTE: The land coloured yellow referred to above is Waterhouse Lane.

2 (05.08.2002) A Conveyance of the land tinted blue on the filed plan and other land dated 31 July 1935 made between (1) William Grose Webber and others (Vendor) and (2) Henry Potter (William Sharp) Limited (Purchaser) contains covenants identical with those contained in the Conveyance dated 3 May 1935 referred to above.

3 (05.08.2002) A Conveyance of the land tinted pink on the filed plan and other land dated 13 January 1936 made between (1) William Grose Webber and others (Vendor) and (2) Henry Potter (William Sharp) Limited (Purchaser) contains covenants identical with those contained in the Conveyance dated 3 May 1935 referred to above.

4 (05.08.2002) By a Deed dated 25 October 1957 made between (1) The English Electric Valve Company Limited and (2) The Mayor Aldermen and Burgesses of the Borough of Chelmsford the land cross hatched blue on the filed plan was dedicated for use as highway land.

NOTE: Copy filed.

5 (05.08.2002) By an Agreement dated 20 November 2001 made between (1) Fairview New Homes (Chelmsford) Limited (2) Marconi Mobile Limited (3) Marconi Applied Technologies Limited (4) Chelmsford Borough Council and (5) Essex County Council the land tinted brown on the filed plan was dedicated as highway land.

NOTE: Copy filed.

6 (30.08.2005) The land is subject for a term of 80 years from 23 June 2005 to the rights in respect of a surface water drain granted by a Deed dated 23 June 2005 made between (1) E2V Technologies (UK) Limited and (2) Ashtenne Land Limited for a term of 80 years from 23 June 2005.

NOTE:-Copy filed.

End of register

Land Registry

8 October 2024

Your ref
TEL14.23

Our ref
EX688035 /OC/133

HM Land Registry
Durham Office
PO Box 75
Gloucester
GL14 9BD

DX 321601 Gloucester 33
Tel 0300 006 0010
Fax NA
Email durham.office@
landregistry.gov.uk
www.gov.uk/land-registry

Official copy/copies

HM Land Registry payment ref 08/10 Z0PB4SRC
Fee debited £3.00

The official copy/copies of the title plan or certificate in form CI you applied for is/are enclosed.

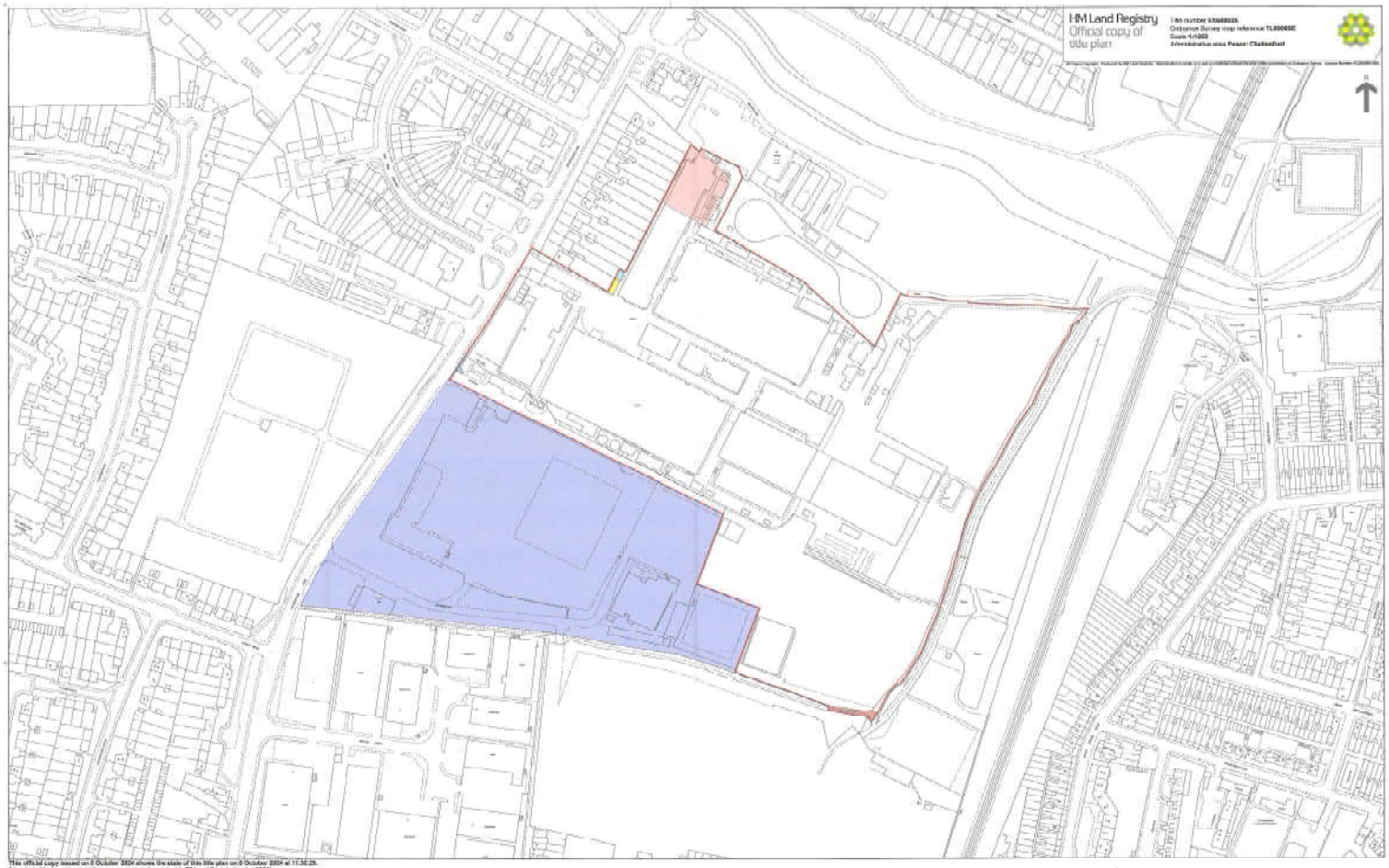
You did not apply for an official copy of the register.

Please contact the HM Land Registry Office named if you have any questions about the enclosed official copy/copies.

TEL14.23

KEYSTONE LAW LTD
DX 193
Chancery Lane

1559002002


HM Land Registry
Official copy of title plan

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Plotted Scale - 1:4000. Paper Size – A4

Title Number: EX688035

In accordance with Section 78 of the Companies Act 2006.

NM01
Notice of change of name by resolution

MONDAY

L8LDKN8R
LD1 30/12/2019 #190
COMPANIES HOUSE

A fee is payable with this form.
Please see 'How to pay' on the last page.

FEE £50 PAID
COMPANIES HOUSE

What this form is for
You may use this form to give notice of an unconditional change of name by the company members.

What this form is NOT for
You cannot use this form to give notice of a conditional change of name.

For further information, please refer to our guidance at www.companieshouse.gov.uk

50 - 50870

1 Company details

Company number	0 0 4 3 2 0 1 4
Existing company name in full	TELEDYNE E2V (UK) LIMITED

→ **Filling in this form**
Please complete in typescript or in bold black capitals.

All fields are mandatory unless specified or indicated by *

2 Proposed name

To check if a company name is available use our WebCHeck service and select the 'Company Name Availability Search' option:

www.companieshouse.gov.uk/info

The above company resolved to change the company name to:

Proposed name ❶: TELEDYNE UK LIMITED

Please note that the Registrar cannot change the company name until a copy of the resolution has been received.

❶ **Sensitive words and duplicate names**
If the proposed name contains sensitive or restricted words or expressions you must provide form NM06 'Request to seek comments of government department or other specified body on change of name' and the appropriate supporting information before the name can be changed.

Duplicate names are not permitted. A list of registered names can be found on our website. There are various rules that may affect your choice of name. More information on this is available in our guidance booklet GP1 at: www.companieshouse.gov.uk

3 Signature

I am signing this form on behalf of the company.

Signature: X [signature] X

This form may be signed by:
Director ❷, Secretary, Person authorised ❸, Liquidator, Administrator, Administrative receiver, Receiver, Receiver manager, Charity commission receiver and manager, CIC manager.

❷ **Societas Europaea**
If the form is being filed on behalf of a Societas Europaea (SE) please delete 'director' and insert details of which organ of the SE the person signing has membership.

❸ **Person authorised**
Under either section 270 or 274 of the Companies Act 2006.

NM01

Notice of change of name by resolution

Presenter information

You do not have to give any contact information, but if you do it will help Companies House if there is a query on the form. The contact information you give will be visible to searchers of the public record.

Contact name: Susanne Pederson

Company name: McGuireWoods London LLP

Address: 11 Pilgrim Street

Post town: London

County/Region:

Postcode: EC4V 6RN

Country: United Kingdom

DX:

Telephone: 02076321690

Checklist

We may return forms completed incorrectly or with information missing.

Please make sure you have remembered the following:

- ☐ The company name and number match the information held on the public Register.
- ☐ You have given the proposed name in section 2.
- ☐ You have checked that the proposed company name is available as well as the various rules that may affect your choice of name. More information can be found in guidance on our website.
- ☐ You have attached a copy of the resolution unless previously filed.
- ☐ You have signed the form.
- ☐ You have enclosed the correct fee.

Important information

Please note that all information on this form will appear on the public record.

How to pay

A fee of £10 is payable to Companies House in respect of a notice of change of name by resolution.

Make cheques or postal orders payable to 'Companies House'.

Where to send

You may return this form to any Companies House address, however for expediency we advise you to return it to the appropriate address below:

For companies registered in England and Wales:
The Registrar of Companies, Companies House,
Crown Way, Cardiff, Wales, CF14 3UZ.
DX 33050 Cardiff.

For companies registered in Scotland:
The Registrar of Companies, Companies House,
Fourth floor, Edinburgh Quay 2,
139 Fountainbridge, Edinburgh, Scotland, EH3 9FF.
DX ED235 Edinburgh 1
or LP - 4 Edinburgh 2 (Legal Post).

For companies registered in Northern Ireland:
The Registrar of Companies, Companies House,
Second Floor, The Linenhall, 32-38 Linenhall Street,
Belfast, Northern Ireland, BT2 8BG.
DX 481 N.R. Belfast 1.

Further information

For further information, please see the guidance notes on the website at www.companieshouse.gov.uk or email enquiries@companieshouse.gov.uk

This form is available in an alternative format. Please visit the forms page on the website at www.companieshouse.gov.uk

The electronic official copy of the register follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.

Mae'r copi swyddogol electronig o'r gofrestr yn dilyn y neges hon.

Sylwch mai hwn yw'r unig gopi swyddogol a ddarparwn. Ni fyddwn yn darparu copi swyddogol papur.

Official copy of register of title
Copi swyddogol o gofrestr teitl

Title number / Rhif teitl	Edition date / Dyddiad yr argraffiad
CYM839162	03.02.2022

- This official copy shows the entries on the register of title on 08 OCT 2024 at 12:42:38.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 08 Oct 2024.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Wales Office.
- Mae'r copi swyddogol hwn yn dangos y cofnodion yn y gofrestr teitl ar 08 HYDREF 2024 am 12:42:38.
- Rhaid dyfynnu'r dyddiad hwn fel y "dyddiad y chwilir ohono" mewn unrhyw gais am chwiliad swyddogol sy'n seiliedig ar y copi hwn.
- Y dyddiad ar ddechrau cofnod yw'r dyddiad y gwnaethpwyd y cofnod yn y gofrestr.
- Cyhoeddwyd ar 08 Hydref 2024.
- Dan adran 67 Deddf Cofrestru Tir 2002, mae'r copi hwn yn dderbyniol fel tystiolaeth i'r un graddau â'r gwreiddiol.
- Gweinyddir y teitl hwn gan Gofrestrfa Tir EF Swyddfa Cymru.

A: Property Register / Cofrestr eiddo

This register describes the land and estate comprised in the title. Except as mentioned below, the title includes any legal easements granted by the registered lease but is subject to any rights that it reserves, so far as those easements and rights exist and benefit or affect the registered land.

Mae'r gofrestr hon yn disgrifio'r tir a'r ystad a gynhwysir yn y teitl. Ac eithrio yr hyn a nodir isod, mae'r teitl yn cynnwys unrhyw hawddfreintiau cyfreithiol a roddir gan y brydles gofrestredig ond mae'r ddarostyngedig i unrhyw hawliau a gedwir ganddi, i'r graddau y mae'r hawddfreintiau a'r hawliau hynny'n bodoli ac o fudd i'r tir cofrestredig neu'n effeithio arno.

POWYS

1 (03.02.2022) The Leasehold land demised by the lease referred to below which lies within the area shown edged with red on the plan of the above Title filed at the Registry and being Unit 1, Broadaxe Business Park, Presteigne (LD8 2UH).

2 (03.02.2022) The mines and minerals together with ancillary powers of working are excepted with provision for compensation in the event of damage caused thereby.

3 (03.02.2022) Short particulars of the lease(s) (or under-lease(s)) under which the land is held:

A: Property Register continued / Parhad o'r gofrestr eiddo

Date : 21 January 2022
Term : 10 years from 21 January 2022
Parties : (1) Intelek Pension Trustees Limited
(2) Teledyne UK Limited

NOTE 1: The original lease dated 21 July 1994 referred to in the above lease was formerly registered under WA731815

NOTE 2: A copy of the original lease is filed under WA731815.

4 (03.02.2022) The Lease prohibits or restricts alienation.

5 (03.02.2022) The title includes any legal easements referred to in clause LR11.1 of the registered lease but is subject to any rights that are granted or reserved by the lease and affect the registered land.

NOTE: A copy of the superior lease dsted 23 March 1998 referred to in the above lease is filed under WA869023.

6 (03.02.2022) The registrar has not seen any consent to the grant of this sub-lease that the superior lease, out of which it was granted, may have required.

7 (03.02.2022) The landlord's title is registered.

B: Proprietorship Register / Cofrestr Perchnogaeth

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Mae'r gofrestr hon yn nodi'r math o deitl ac yn enwi'r perchennog. Mae'n cynnwys unrhyw gofnodion sy'n effeithio ar yr hawl i waredu.

Title absolute/Teitl llwyr

1 (03.02.2022) PROPRIETOR: TELEDYNE UK LIMITED (Co. Regn. No. 00432014) of 106 Waterhouse Lane, Chelmsford CM1 2QU.

C: Charges Register / Cofrestr Arwystlon

This register contains any charges and other matters that affect the land.

Mae'r gofrestr hon yn cynnwys unrhyw arwystlon a materion eraill sy'n effeithio ar y tir.

1 (03.02.2022) The land is subject to the provisions of a Wayleave Consent dated 17 November 1949 in favour of The Midlands Electricity Board.

NOTE: Copy filed under WA573844.

End of register / Diwedd y gofrestr

These are the notes referred to on the following official copy

Dyma'r nodiadau y cyfeirir atynt ar y copi swyddogol canlynol.

The electronic official copy of the title plan follows this message.

Mae'r copi swyddogol electronig o'r cynllun teitl yn dilyn y neges hon.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.

Sylwch mai hwn yw'r unig gopi swyddogol a ddarparwn. Ni fyddwn yn darparu copi swyddogol papur.

This official copy was delivered electronically and when printed will not be to scale. You can obtain a paper official copy by ordering one from HM Land Registry.

Anfonwyd y copi swyddogol hwn yn electronig a phan gaiff ei argraffu ni fydd wrth raddfa. Gallwch gael copi swyddogol papur trwy archebu un o Gofrestrfa Tir EF.

This official copy is issued on 08 October 2024 shows the state of this title plan on 08 October 2024 at 12:42:38. It is admissible in evidence to the same extent as the original (s.67 Land Registration Act 2002). This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground.
This title is dealt with by the HM Land Registry, Wales Office .

Mae'r copi swyddogol hwn a gyhoeddir ar 08 Hydref 2024 yn dangos sefyllfa'r cynllun teitl hwn ar 08 Hydref 2024 am 12:42:38. Mae'n dderbyniol fel tystiolaeth i'r un graddau â'r gwreiddiol (adran 67 Deddf Cofrestru Tir 2002). Mae'r cynllun teitl hwn yn dangos safle cyffredinol, nid union linell, y terfynau. Gall fod gwyriadau yn y raddfa. Mae'n bosibl na fydd mesuriadau wedi eu graddio o'r cynllun hwn yn cyfateb â mesuriadau rhwng yr un pwyntiau ar y llawr. Gweinyddir y teitl hwn gan Gofrestrfa Tir EF Swyddfa Cymru.

HM Land Registry
Official copy of title plan

Title number **CYM839162**
Ordnance Survey map reference **SO3163NE**
Scale **1:1250 enlarged from 1:2500**
Administrative area **Powys**

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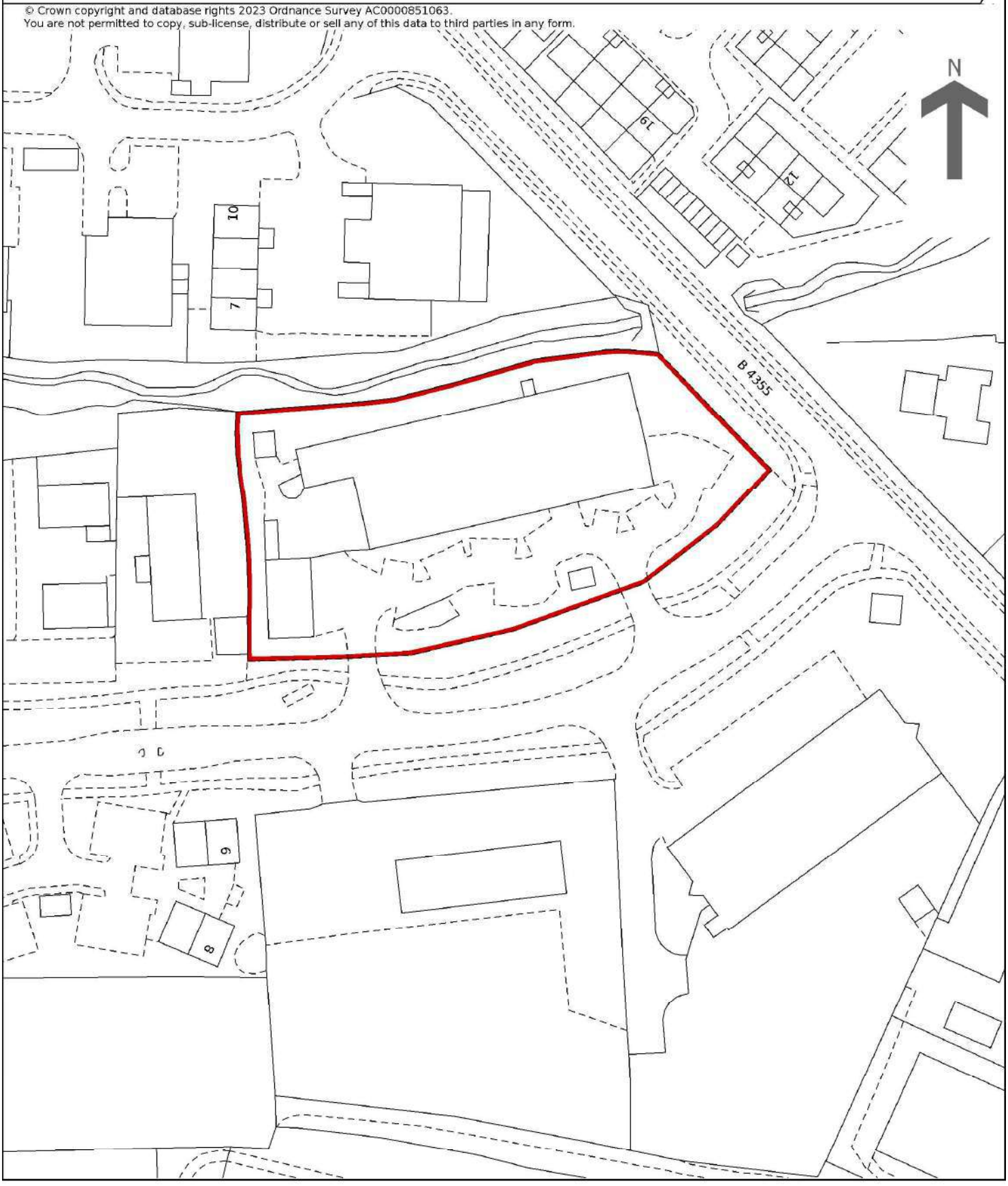

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Plotted Scale - 1:1000. Paper Size – A4

Title Number: CYM839162

DATED 9th October 2024

RENEWAL LEASE BY REFERENCE TO AN EXISTING LEASE

relating to

Units 5 and 6 Presteigne Industrial Estate,

Presteigne, Powys

between

[redacted]

and

(2) TELEDYNE UK LIMITED

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CLAUSE

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3. Tenant's Covenants 3
4. Landlord's Covenants 3
5. The Existing Lease 4
6. Section 62 of the Law of Property Act 1925, implied rights and existing appurtenant rights 4
7. Entire agreement 4

SCHEDULE

Schedule 1 Variations to the Existing Lease 5

ANNEX

ANNEX A Copy of the Existing Lease 10

This lease is dated 9th October 2024

PARTIES

(1) [redacted]

(2) **TELEDYNE UK LIMITED** incorporated and registered in England and Wales with company number 00432014 whose registered office is at 106 Waterhouse Lane, Chelmsford, Essex, CM1 2QU ('the Tenant')

BACKGROUND

(A) The Landlord is the freehold owner of the Property.

(B) The residue of the term of the Existing Lease is vested in the Tenant.

(C) The Landlord has agreed to grant a new lease of the Property to the Tenant on the terms set out in this lease.

Agreed Terms

1. Interpretation

The following definitions and rules of interpretation apply in this lease.

1.1 Definitions:

[redacted]

Contractual Term: a term of 5 years from and including 9th October 2024 to and including 8th October 2029.

Existing Lease: the lease of the Property dated 28 September 2018 and made between (1) the Landlord and (2) Teledyne Limited (trading as Teledyne Labtech) (a copy of which is annexed to this lease at ANNEX A).

[redacted]

[redacted]

Property: the property known as Units 5 and 6 Presteigne Industrial Estate, Presteigne, Powys the freehold title of which is registered at HM Land Registry under title number WA552132 and shown edged red on the Plan and as described in the definition of "The Premises" in the Existing Lease.

[redacted]

2. Grant

2.1 The Landlord lets the Property to the Tenant:

(a) for the Contractual Term;

(b) with full title guarantee;

(c) on the terms of this lease which include the Incorporated Terms as if they were set out in full in this lease; and

(d) with the Tenant paying as rent to the Landlord the sums reserved as rent in the Incorporated Terms at the times and in the manner set out in the Incorporated Terms.

3. Tenant's Covenants

The Tenant covenants with the Landlord to comply with the Tenant's Covenants.

4. Landlord's Covenants

The Landlord covenants with the Tenant to comply with the Landlord's Covenants.

[redacted]

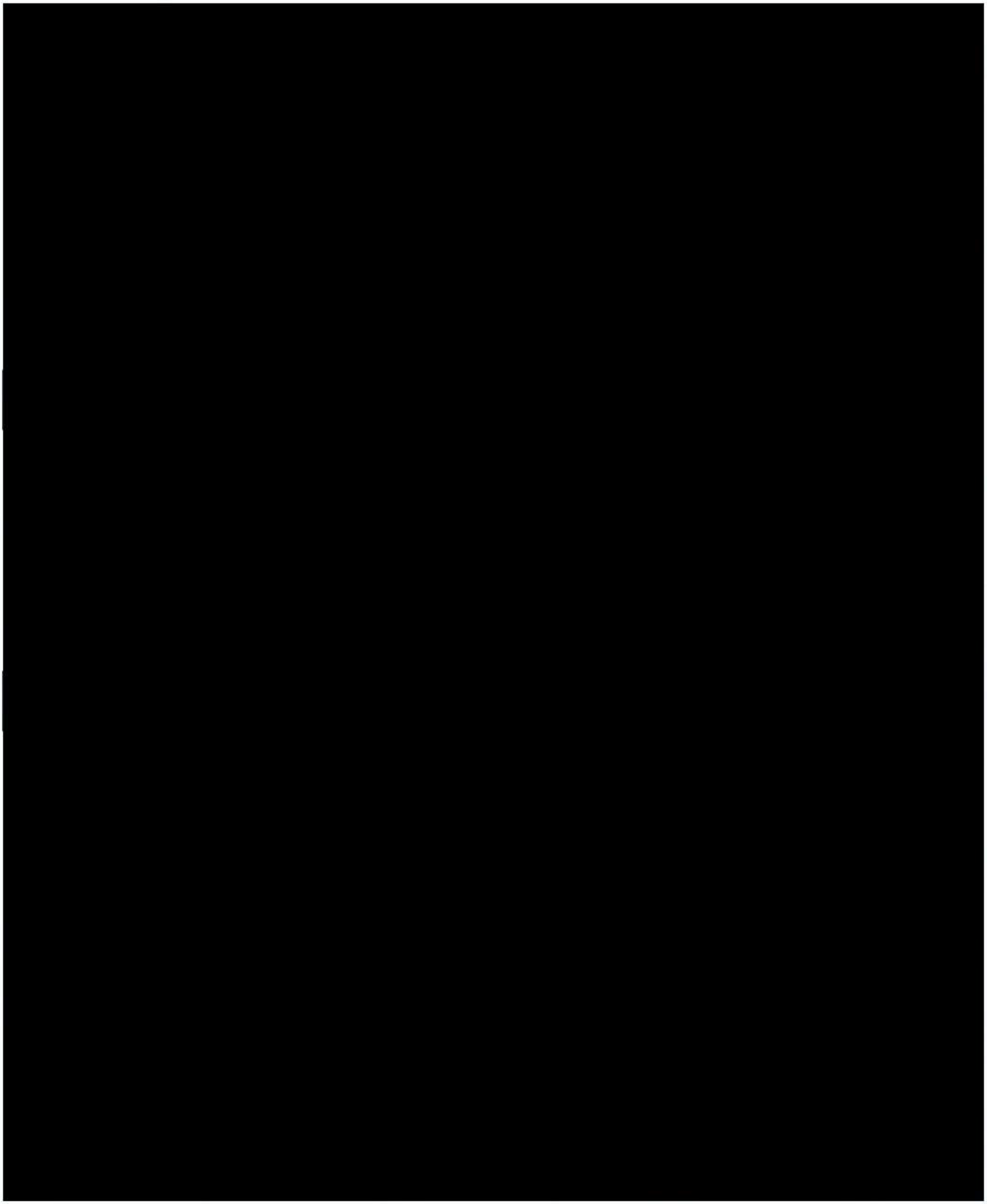
2. Substitution of the Contractual Term

For the purposes of this lease only, the provisions of the Existing Lease shall be varied as follows:

2.1 The Existing Lease Contractual Term shall be deleted and replaced by the Contractual Term.

2.2 All of the provisions in the Existing Lease relating to the Existing Lease Contractual Term shall be read and construed as referring to the Contractual Term instead.

[redacted]



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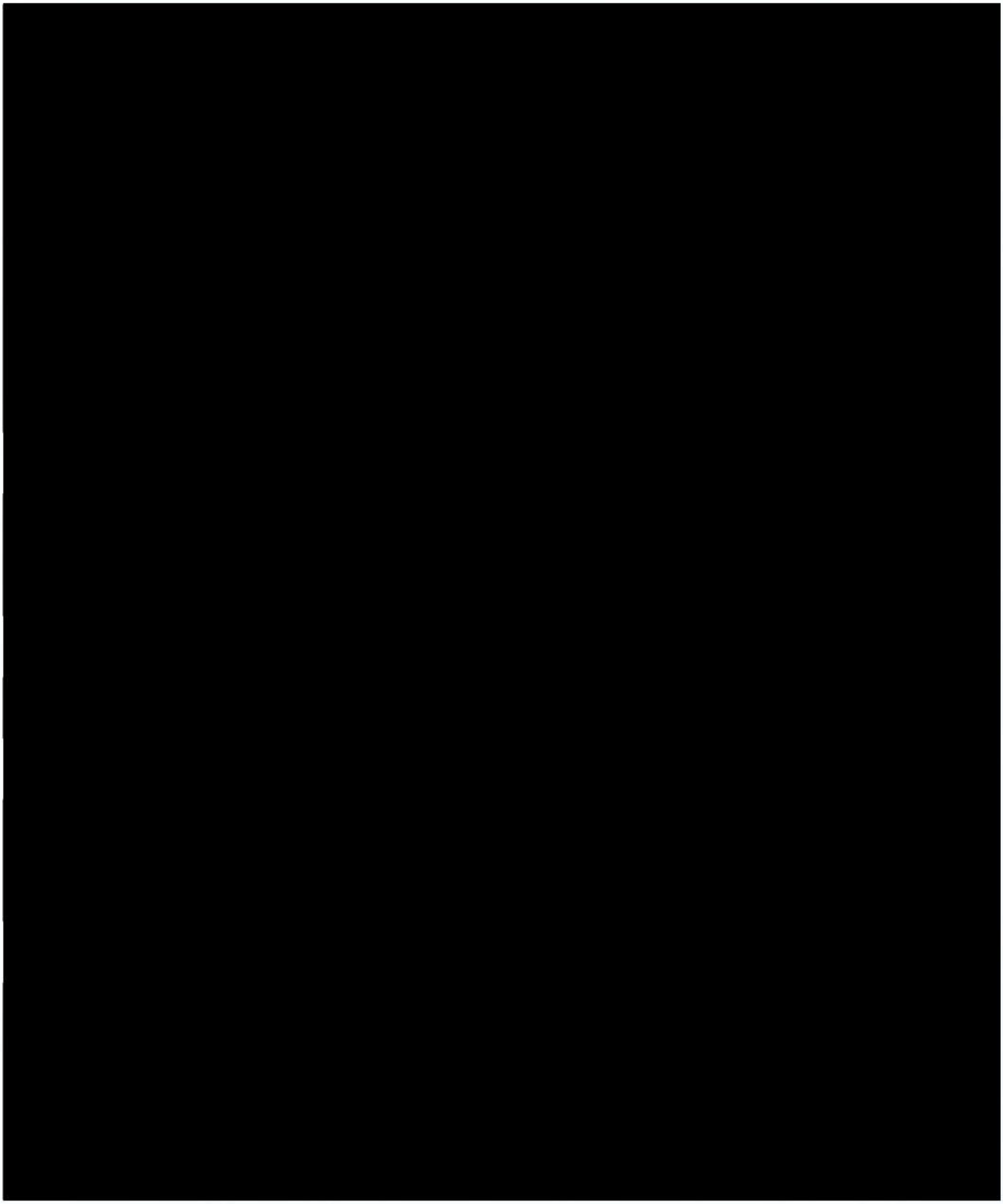

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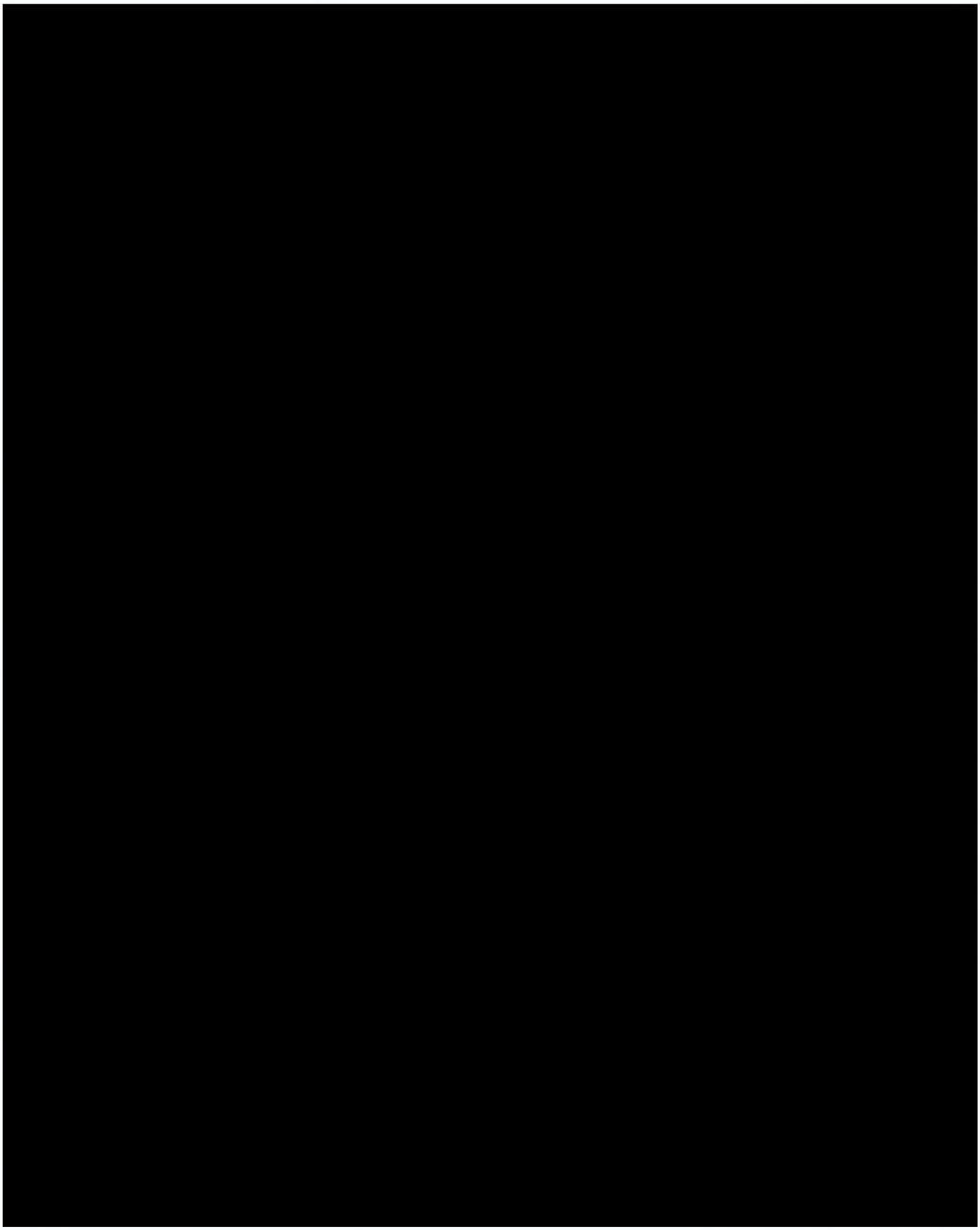


8

ANNEX A **Copy of the Existing Lease**

DATED 28th September 2018

[redacted]

(2) TELEDYNE LIMITED (trading as Teledyne Labtech)

LEASE

of

Units 5 and 6 Presteigne Industrial Estate,
Presteigne, Powys

[redacted]

THIS LEASE is made the 28th day of September, 2018

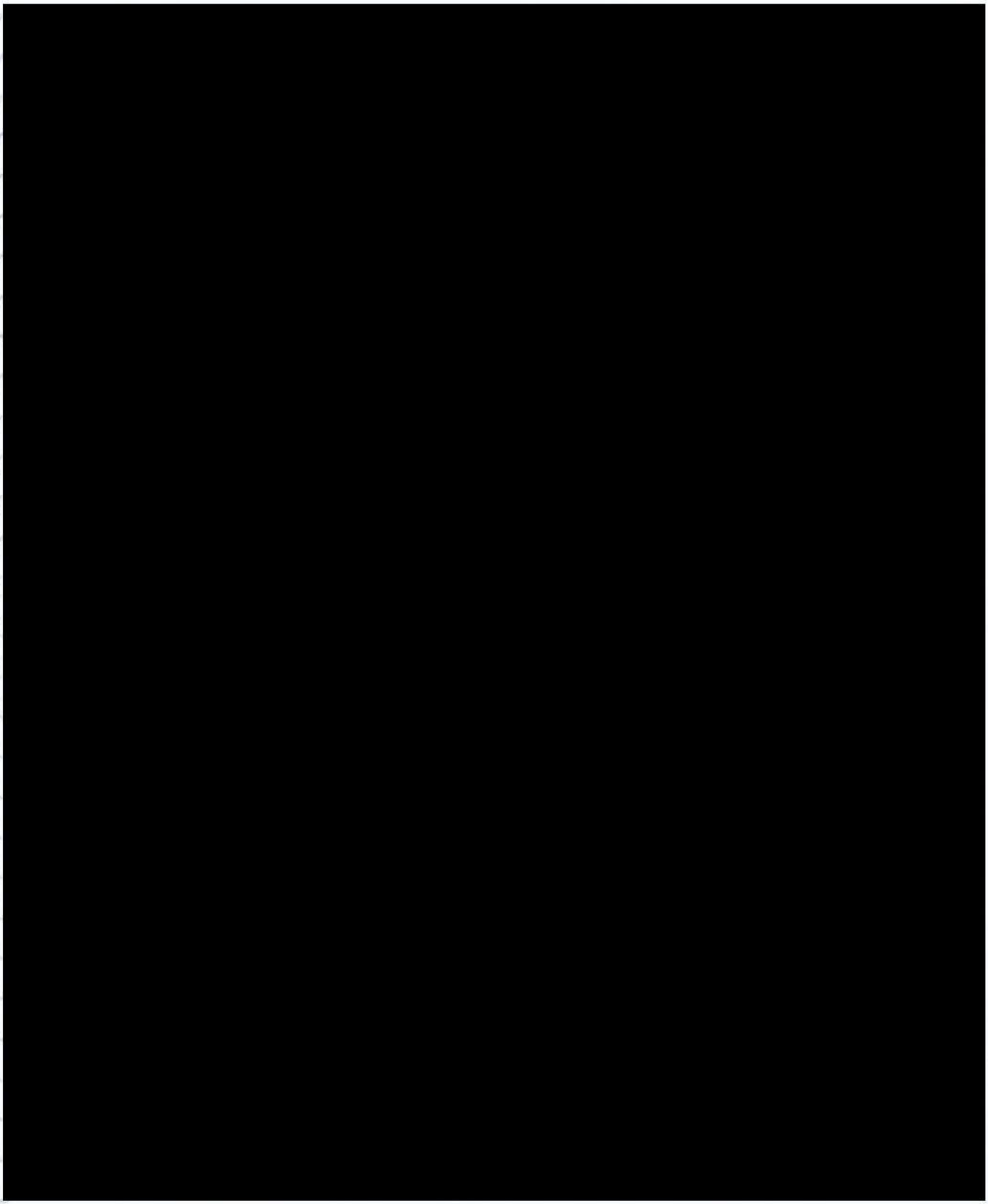
BETWEEN:

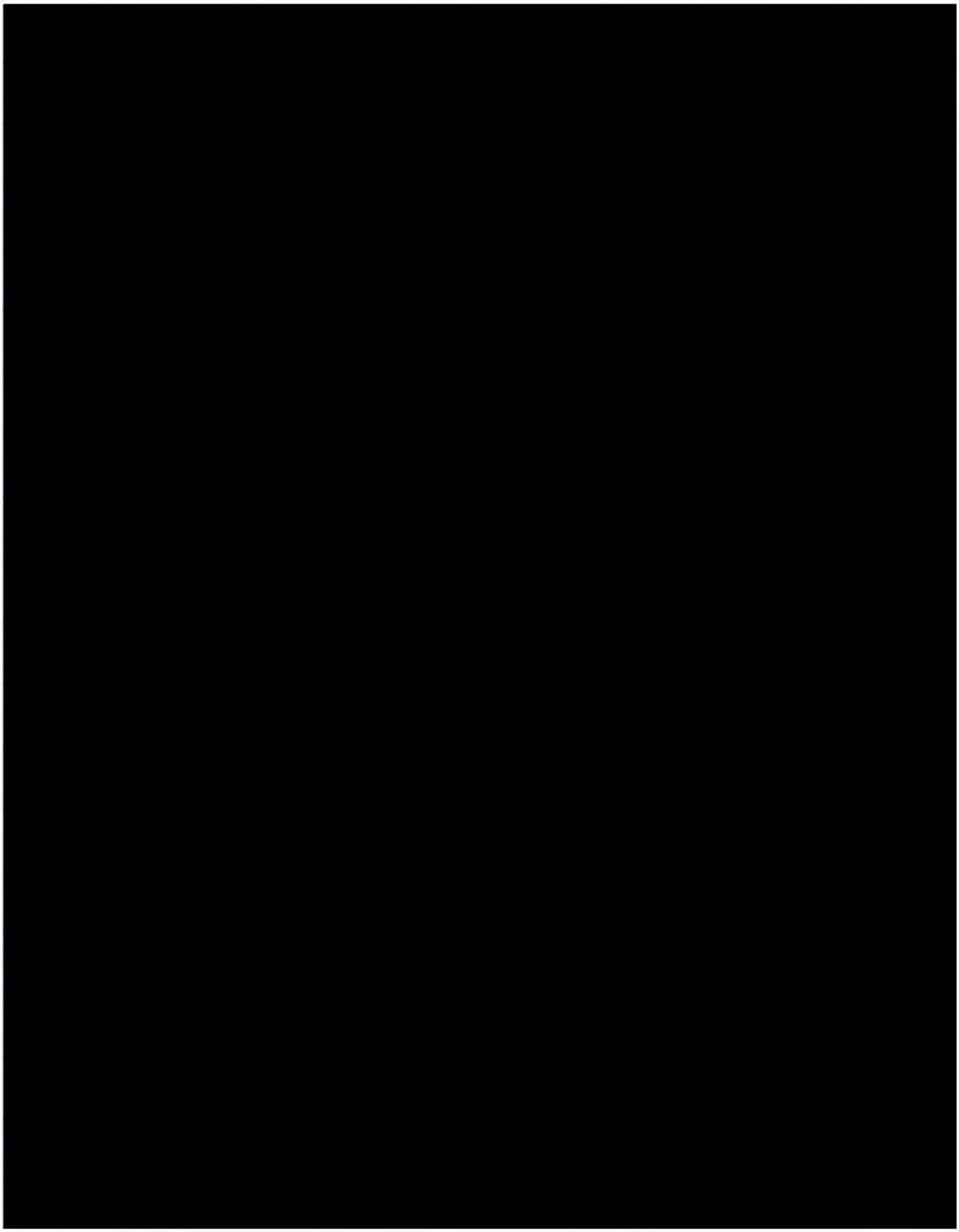
[redacted]

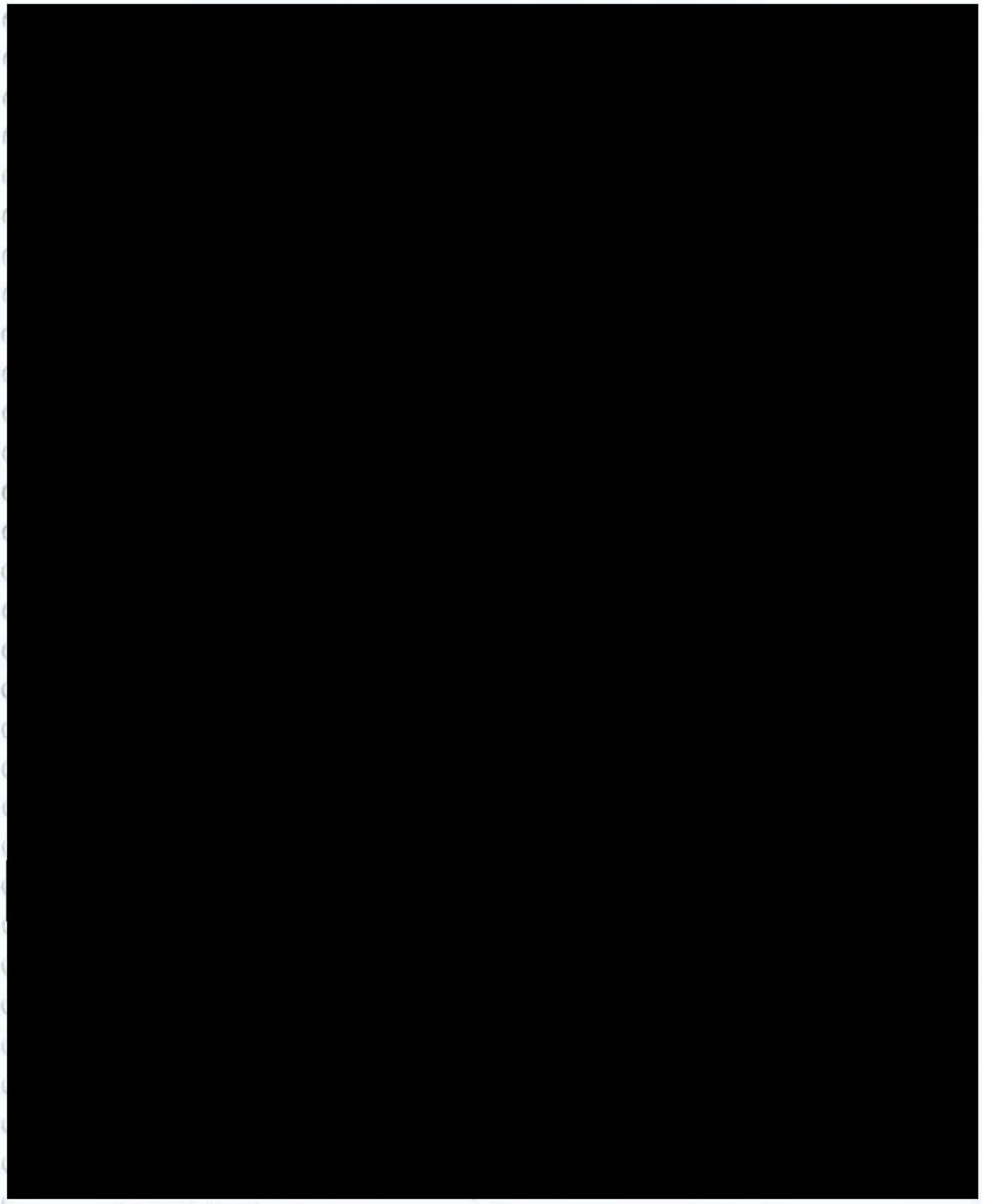
(2) **TELEDYNE LIMITED (trading as Teledyne Labtech)** (Company number: 03863642) whose registered office is at Aviation House, The Lodge, Harmondsworth Lane, West Drayton, Middlesex UB7 0LQ ('the Tenant')

[redacted]

[redacted]







H.M. LAND REGISTRY

TITLE NUMBER	
WA 52132	

ORDNANCE SURVEY PLAN REFERENCE	SO 3164	Scale 1/2500
~~COUNTY~~ ~~POWYS~~	~~DISTRICT~~ ~~RADNORSHIRE~~	© Crown Copyright 19

ADMINISTRATIVE AREA
POWYS

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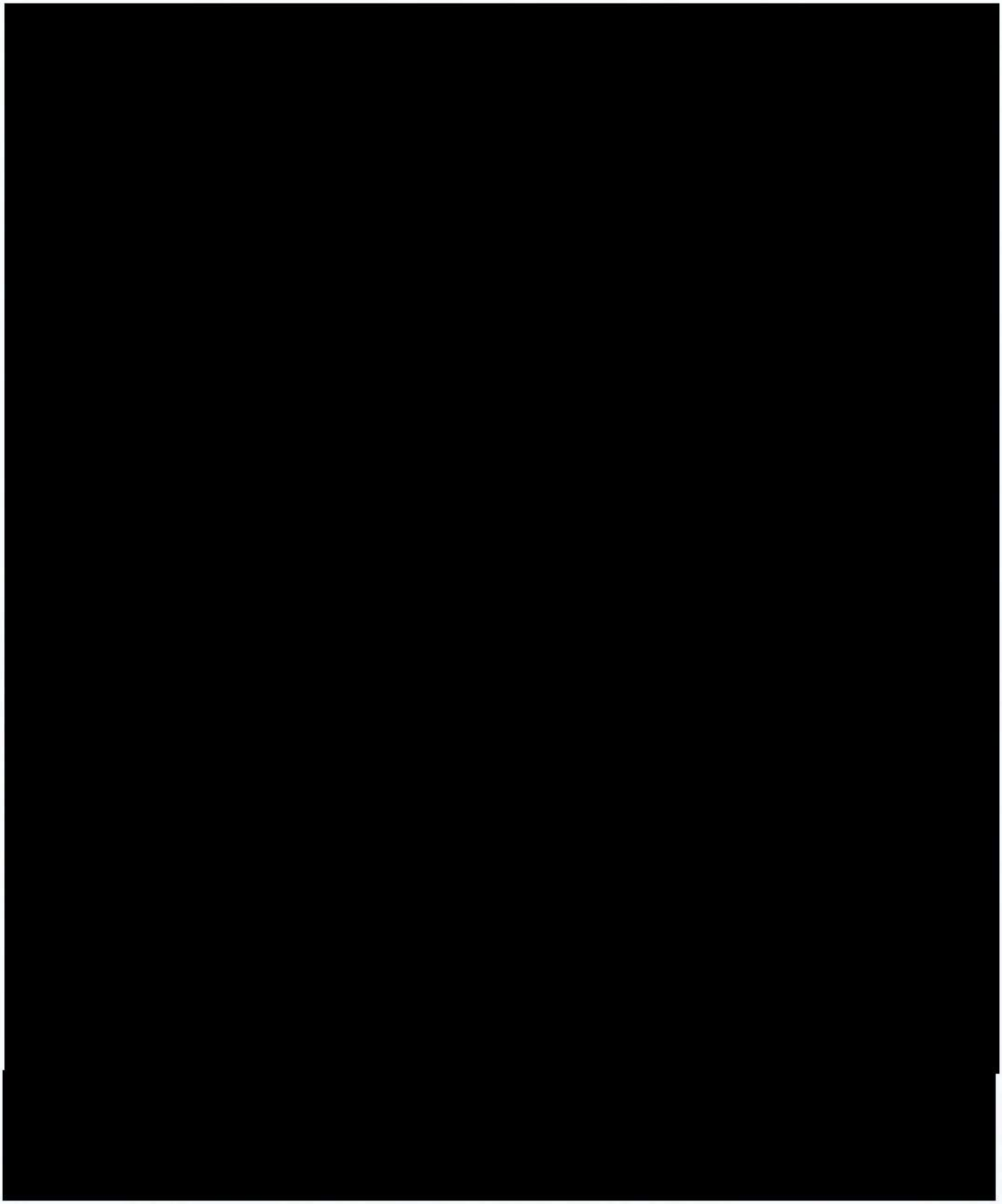

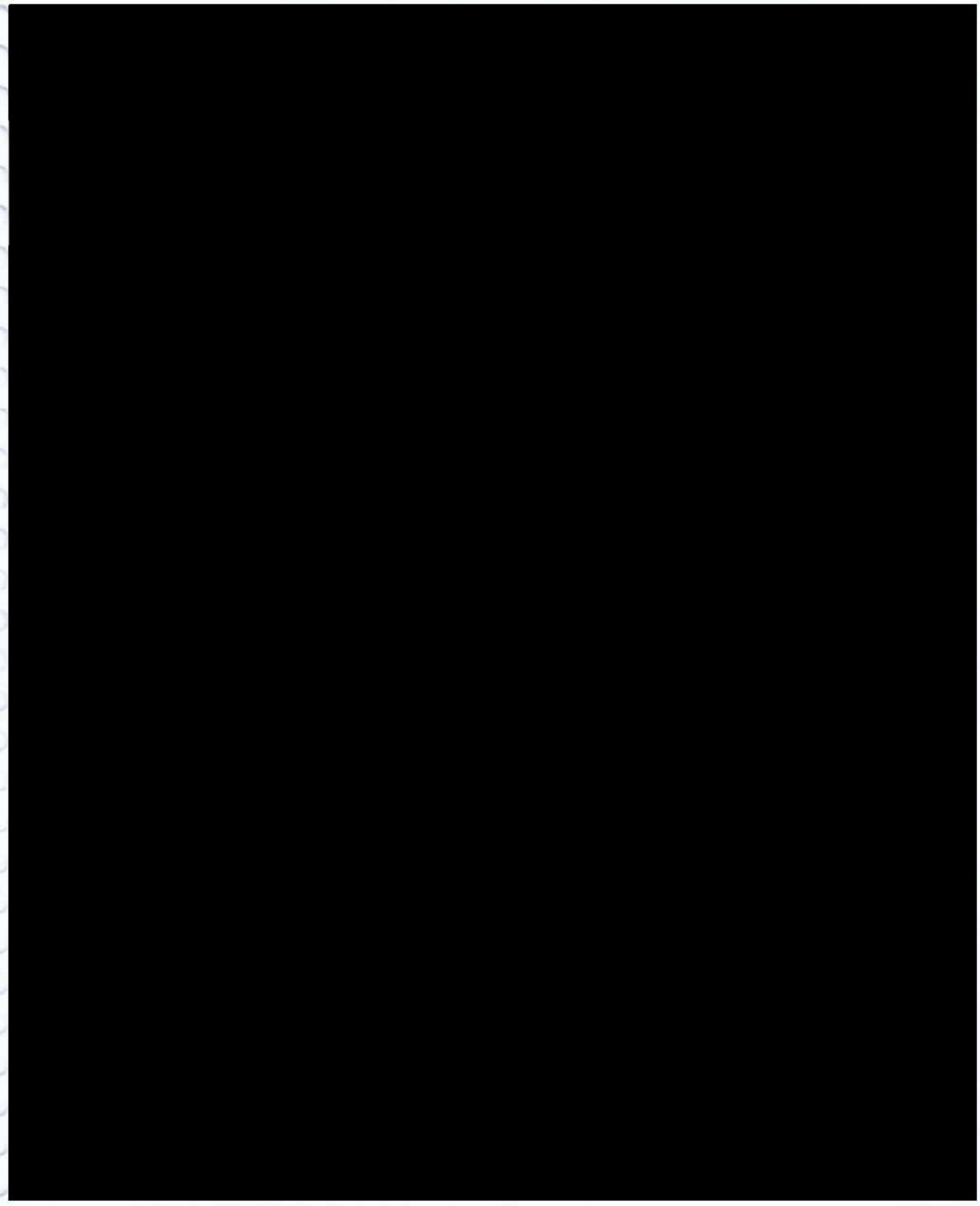

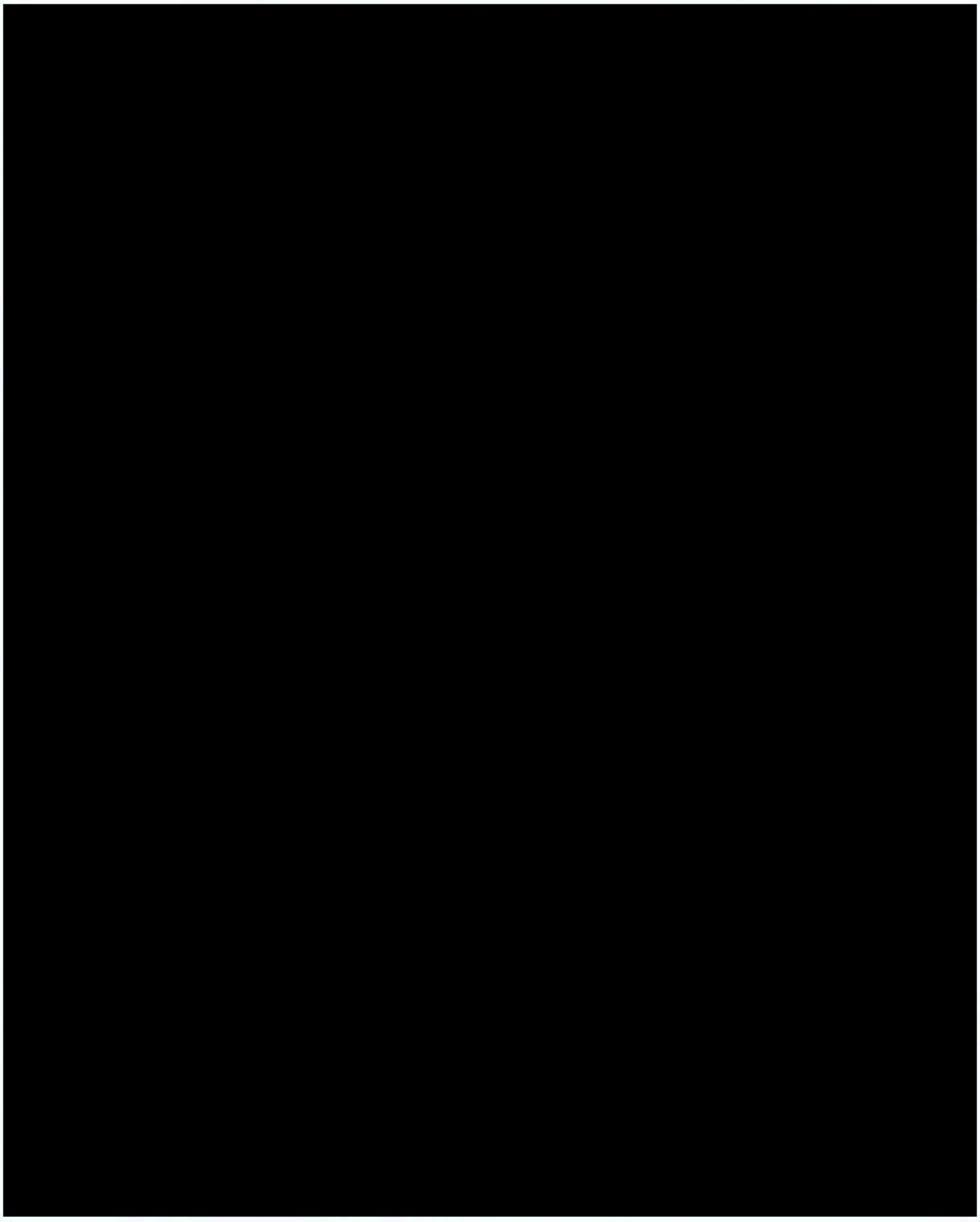

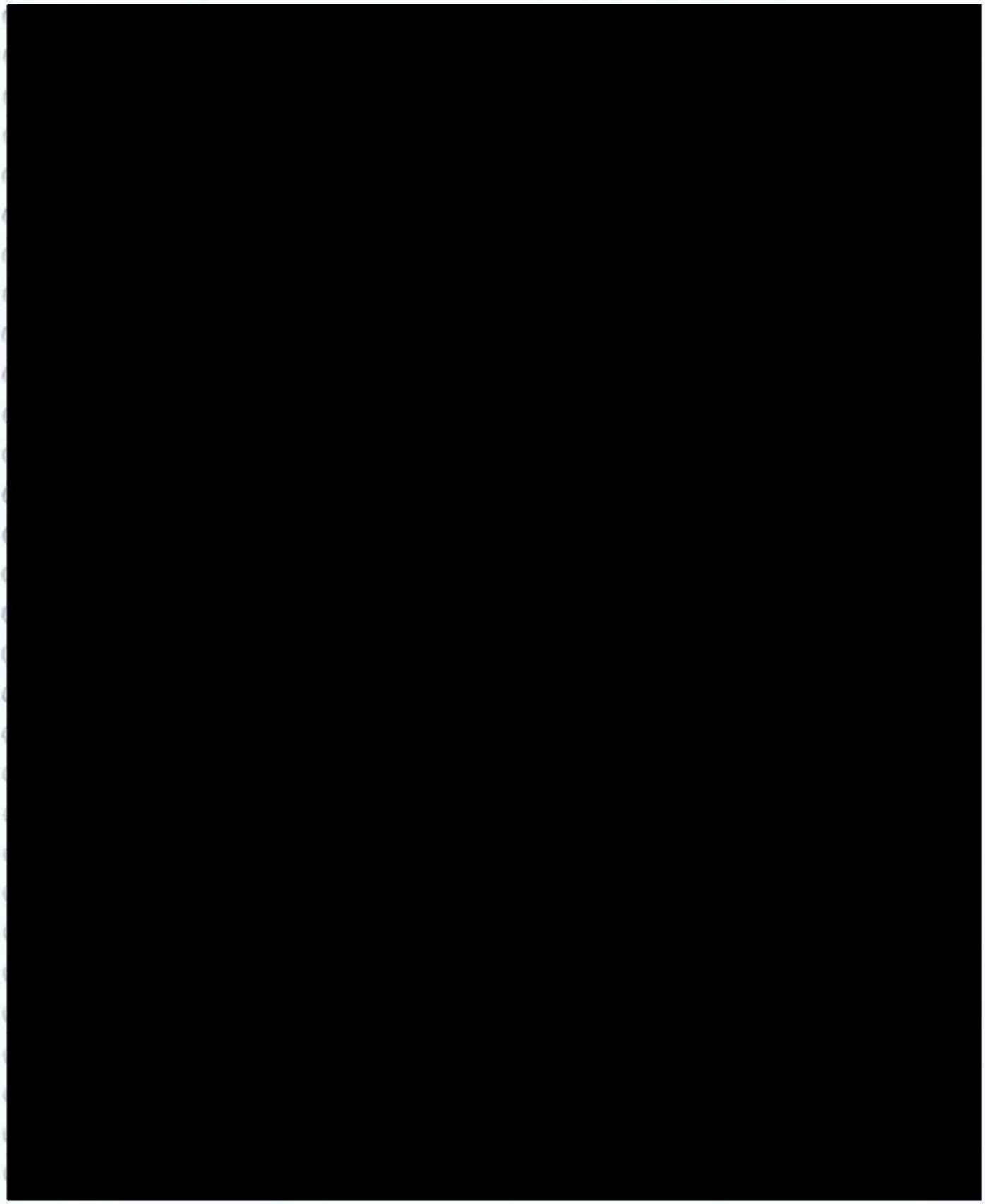

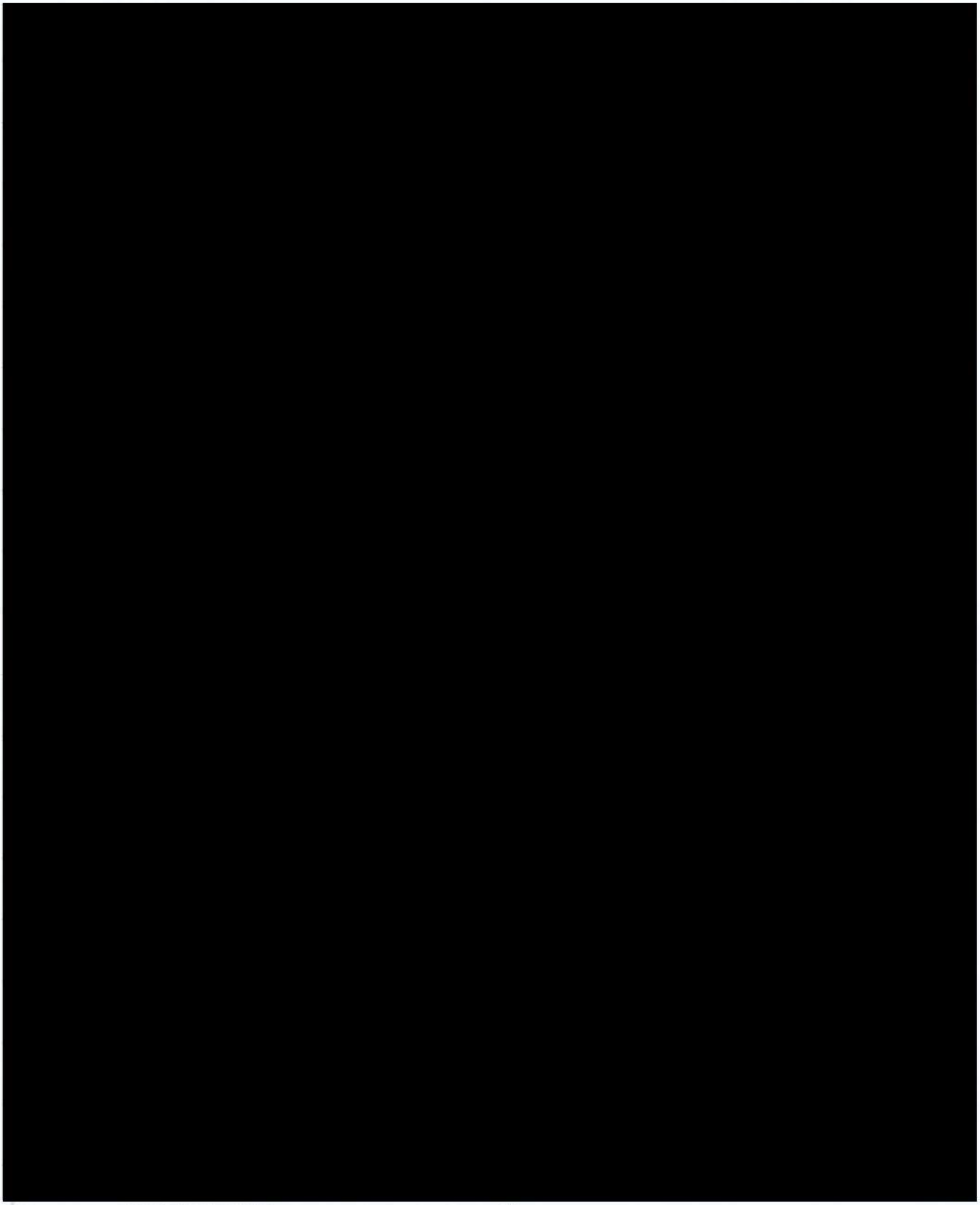

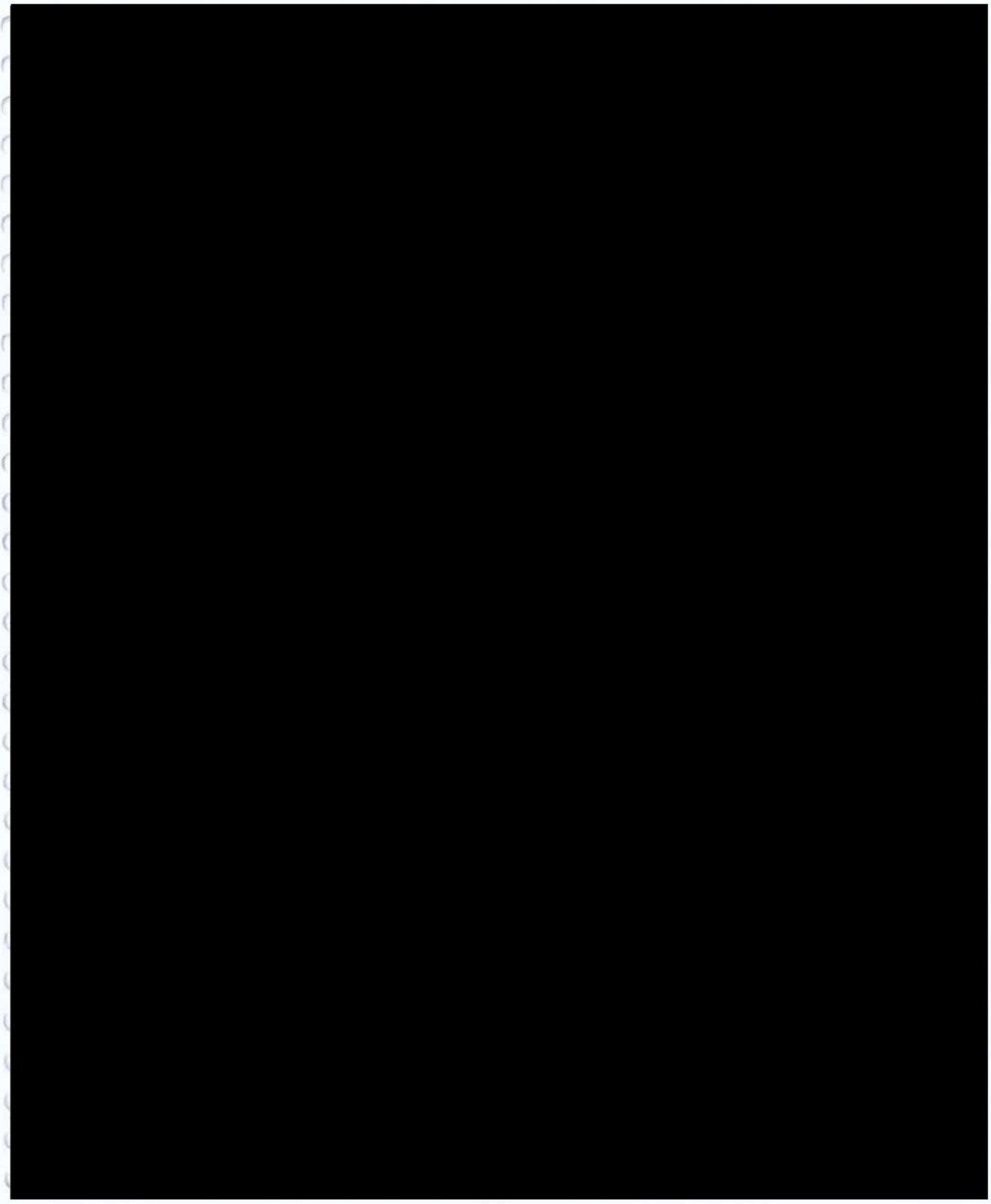

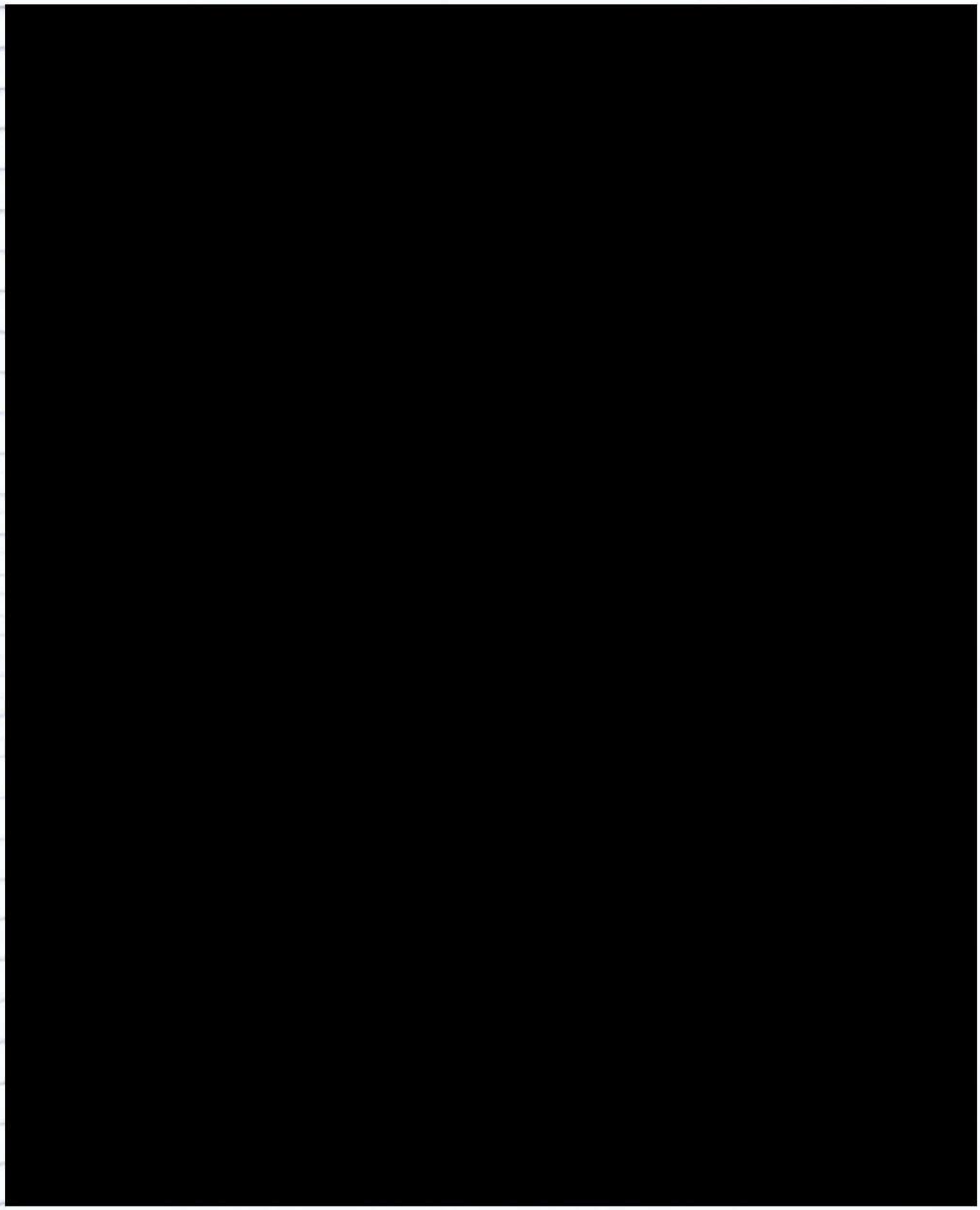

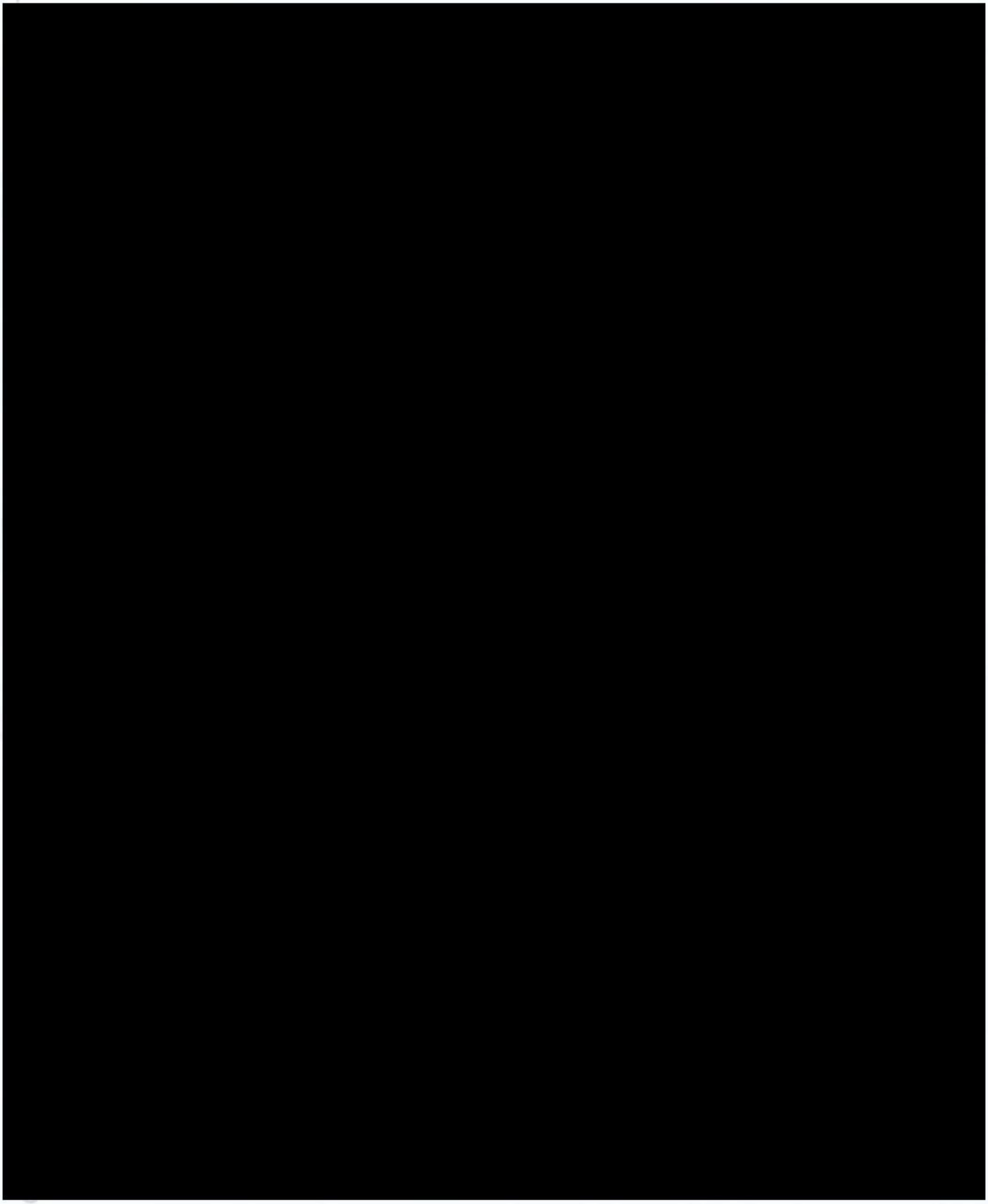

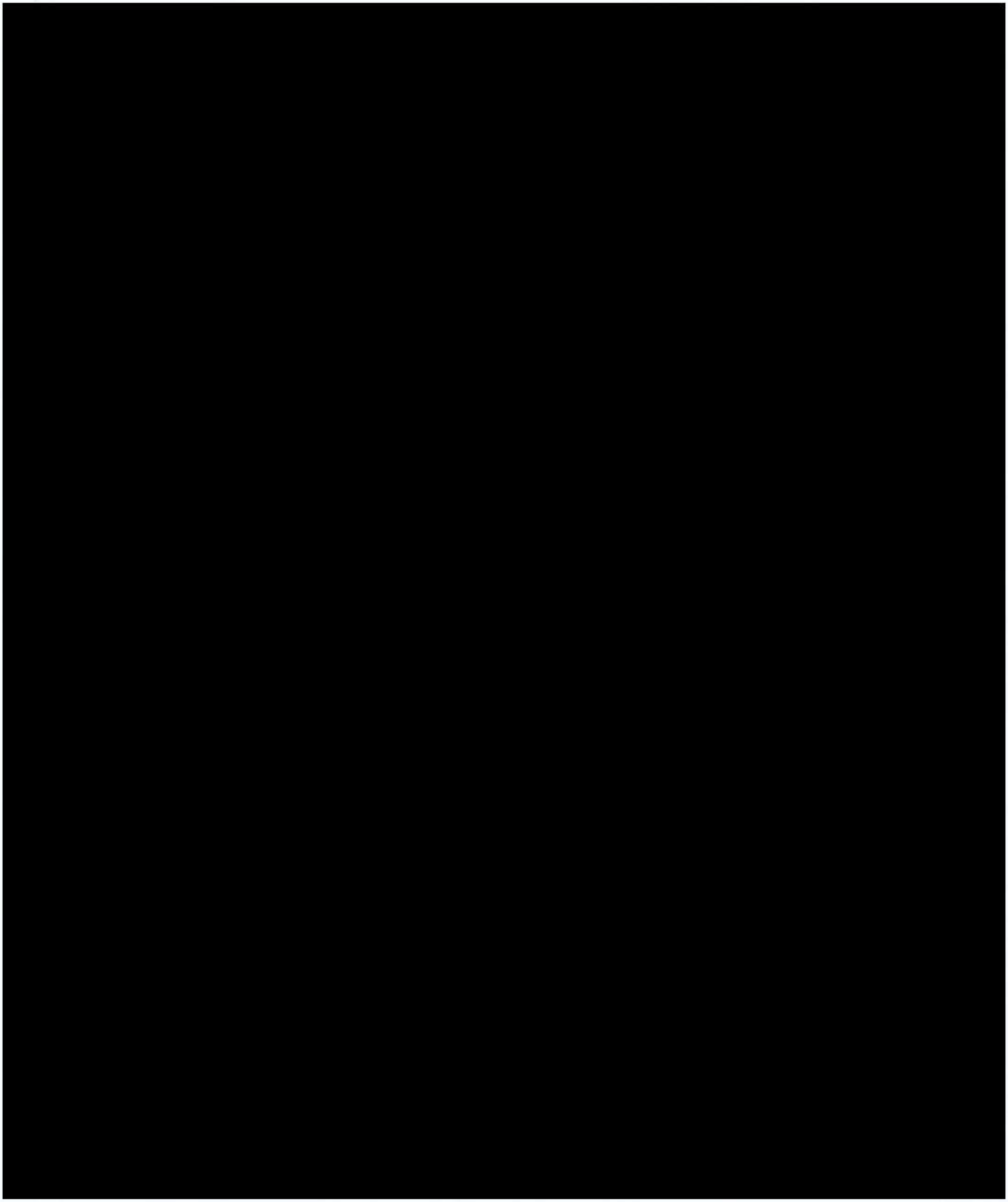

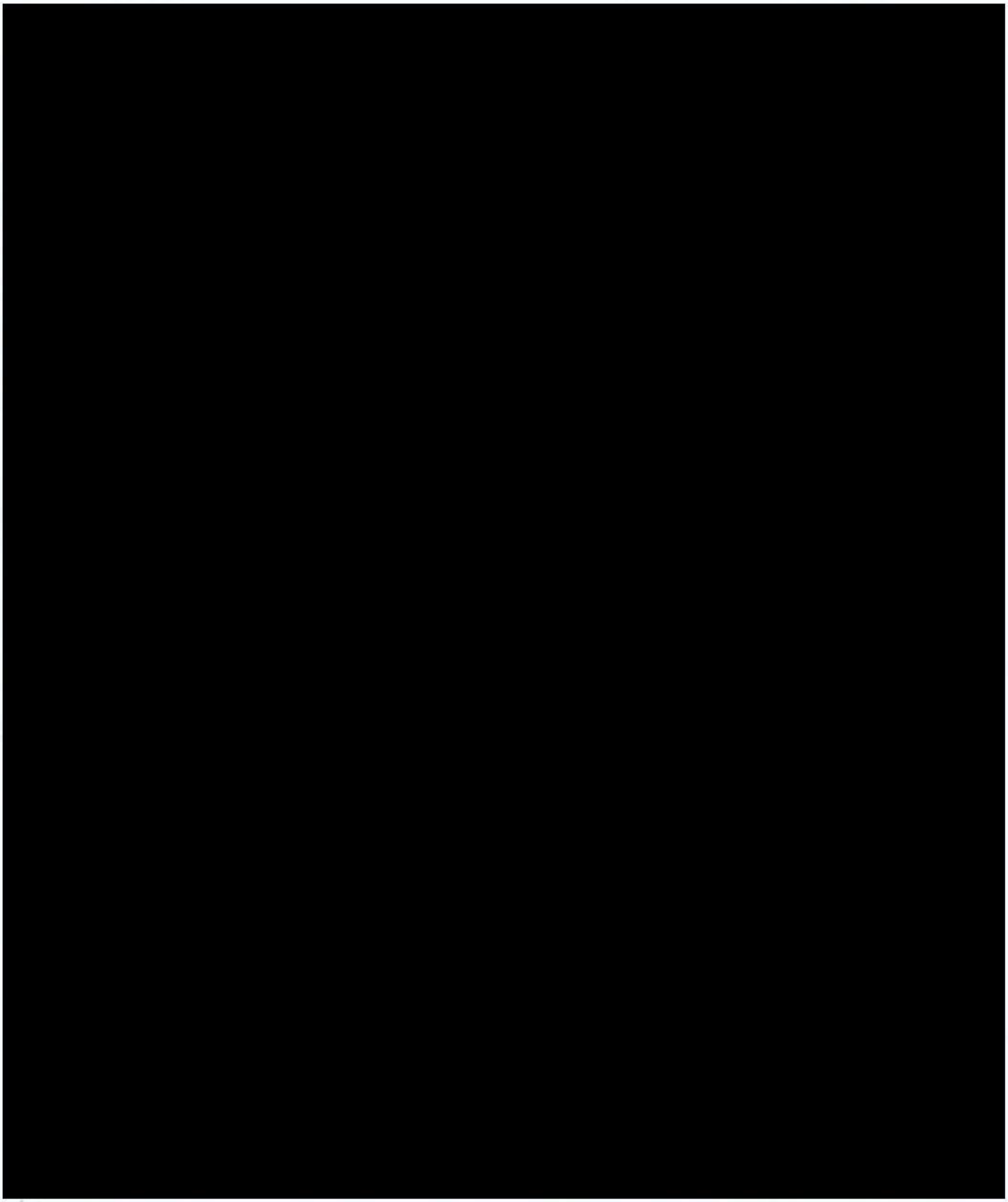

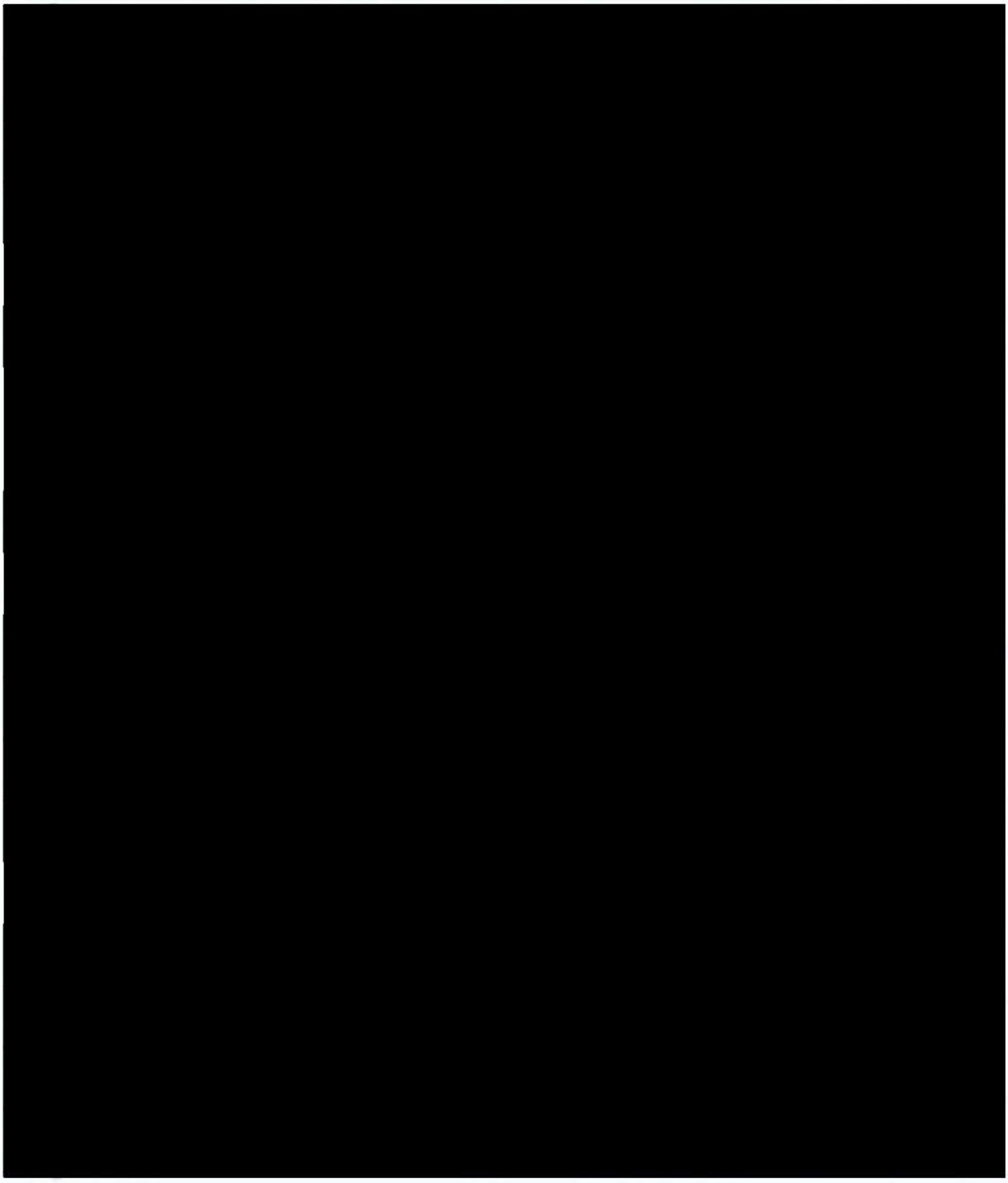

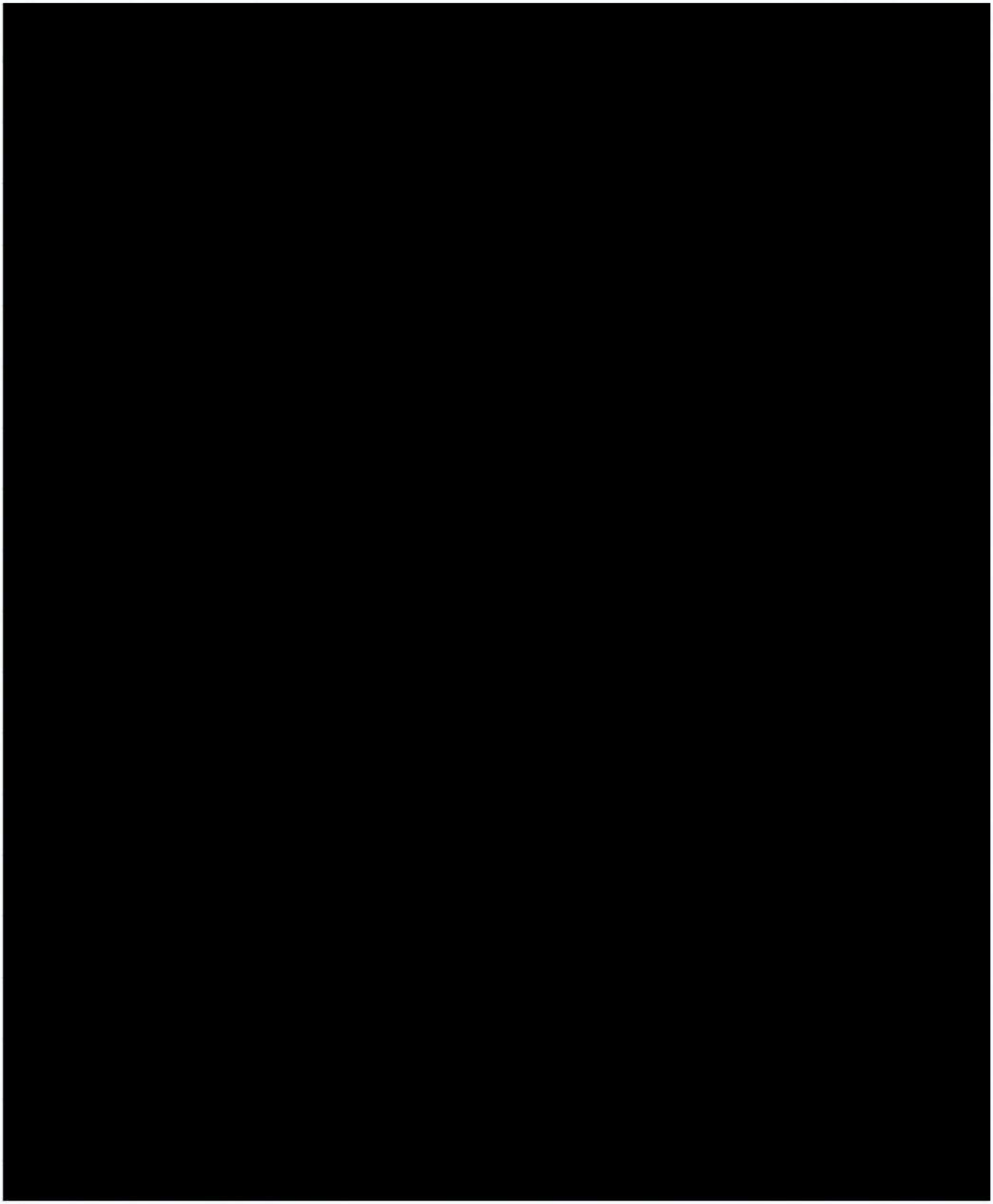

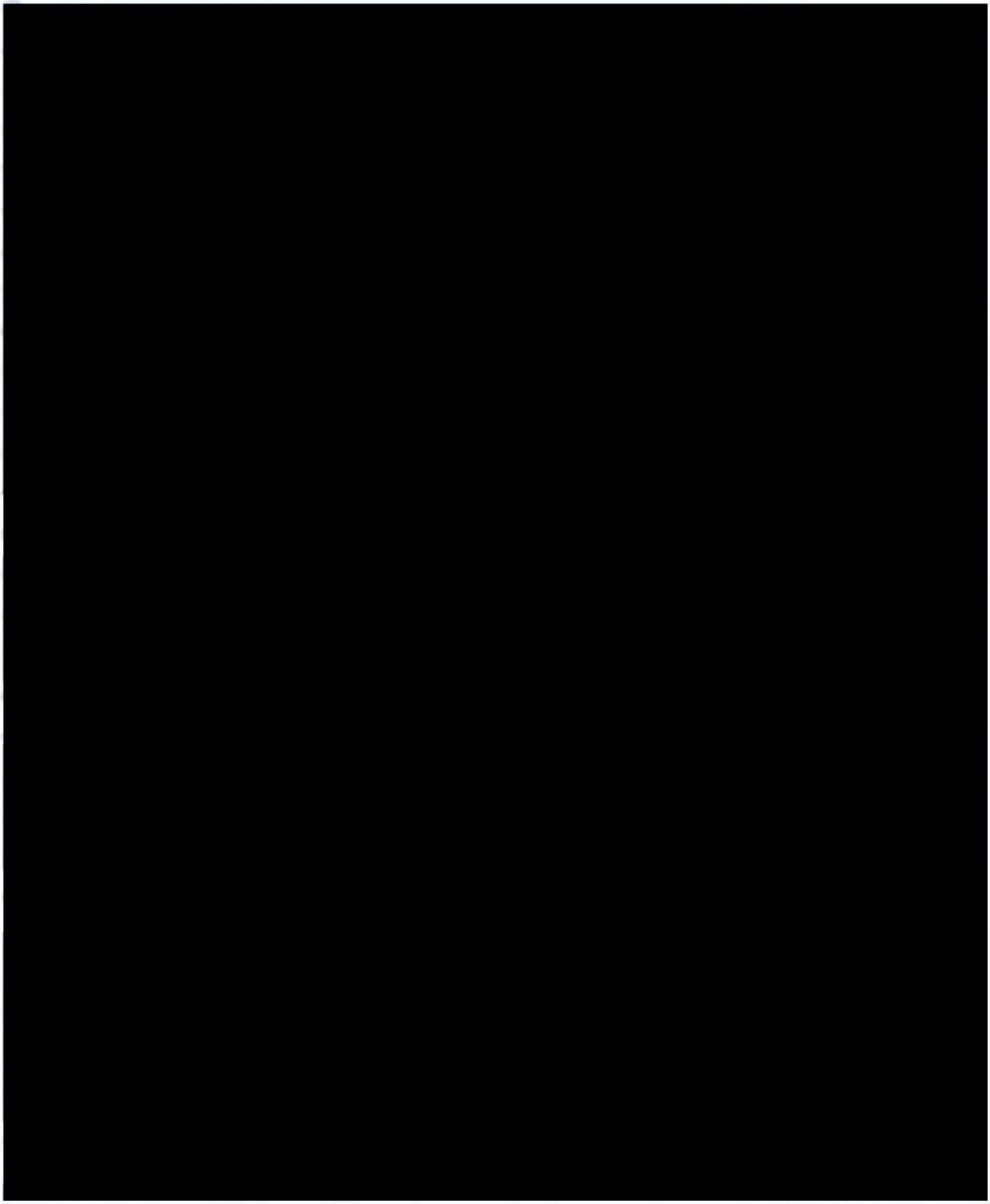

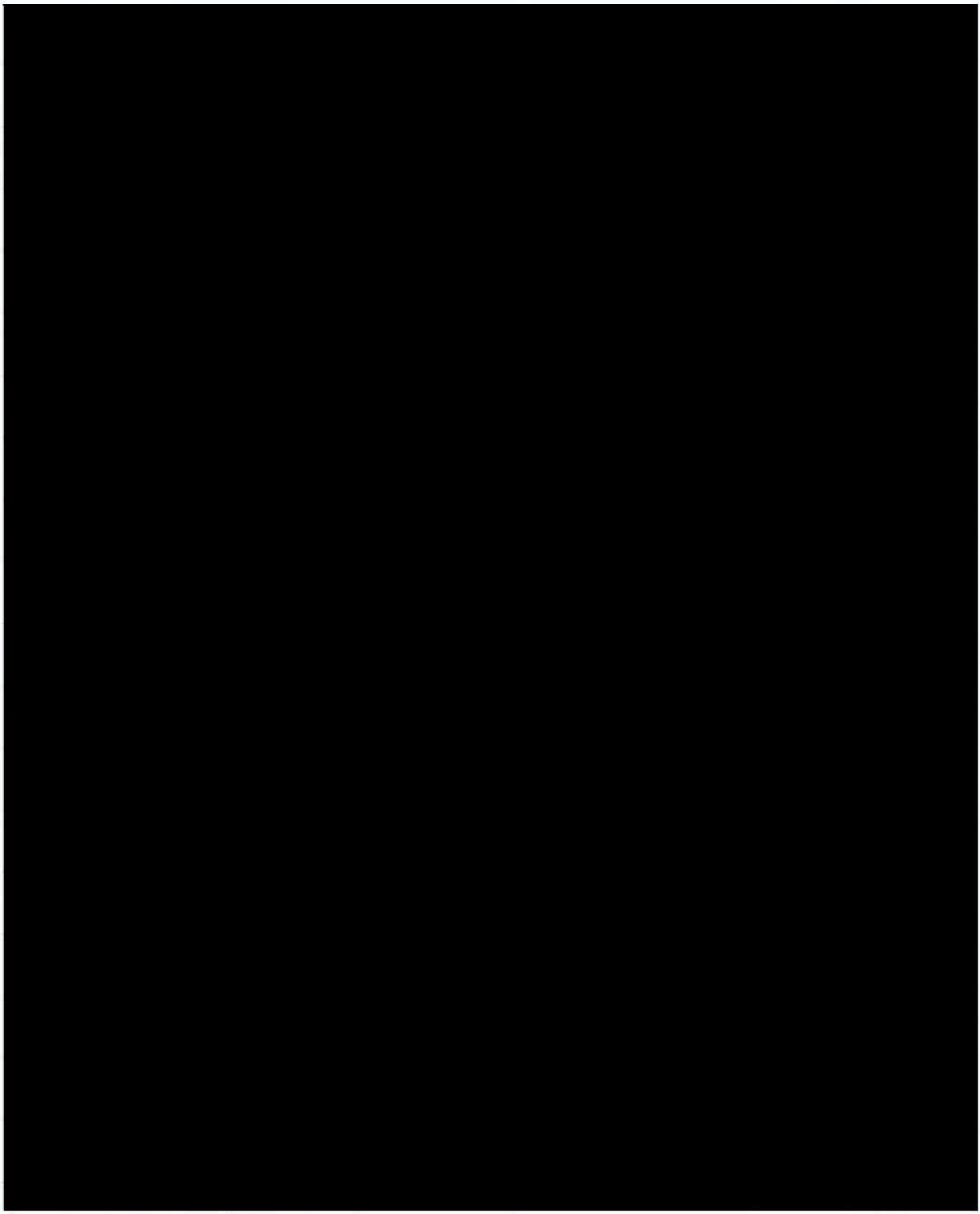

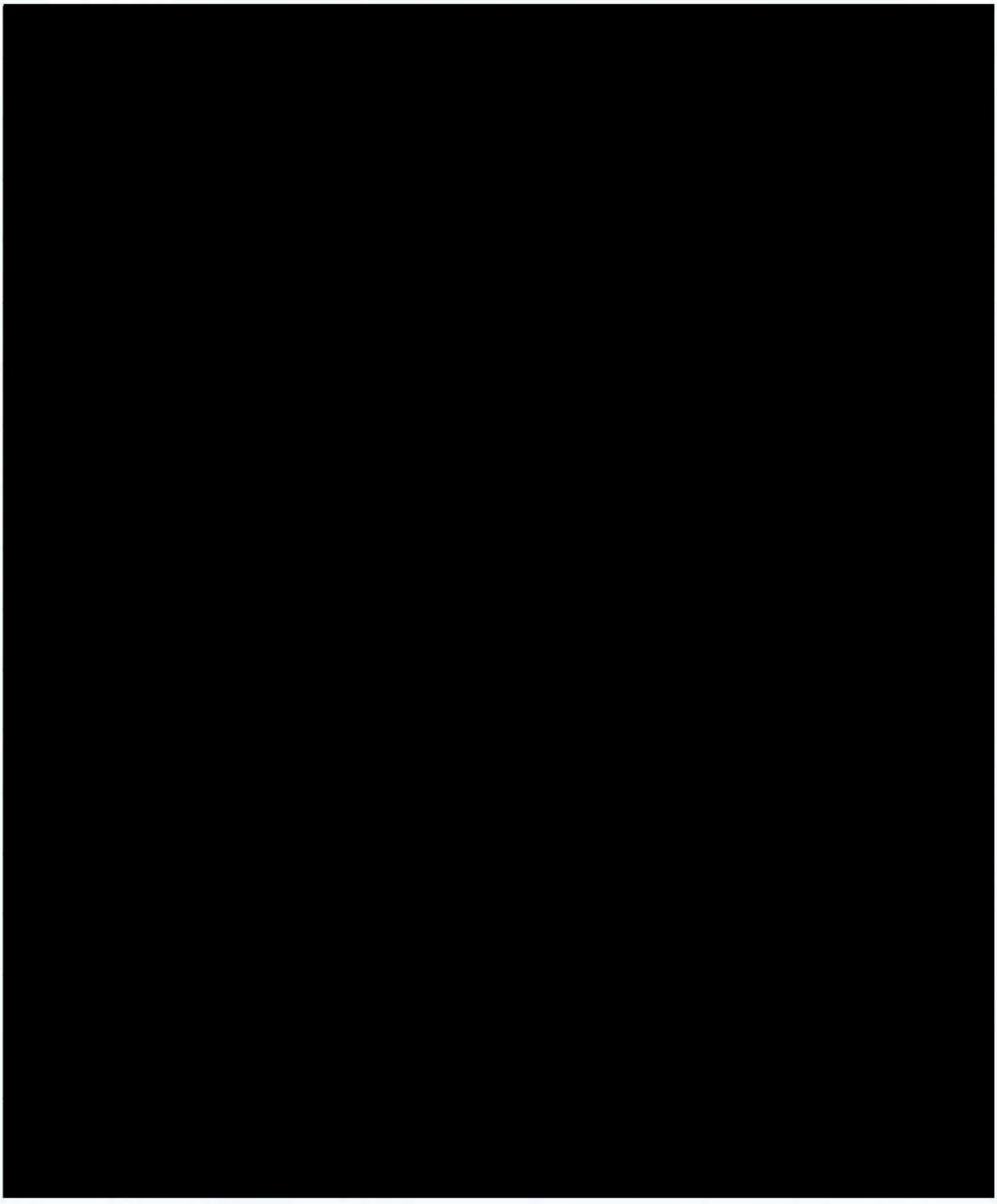

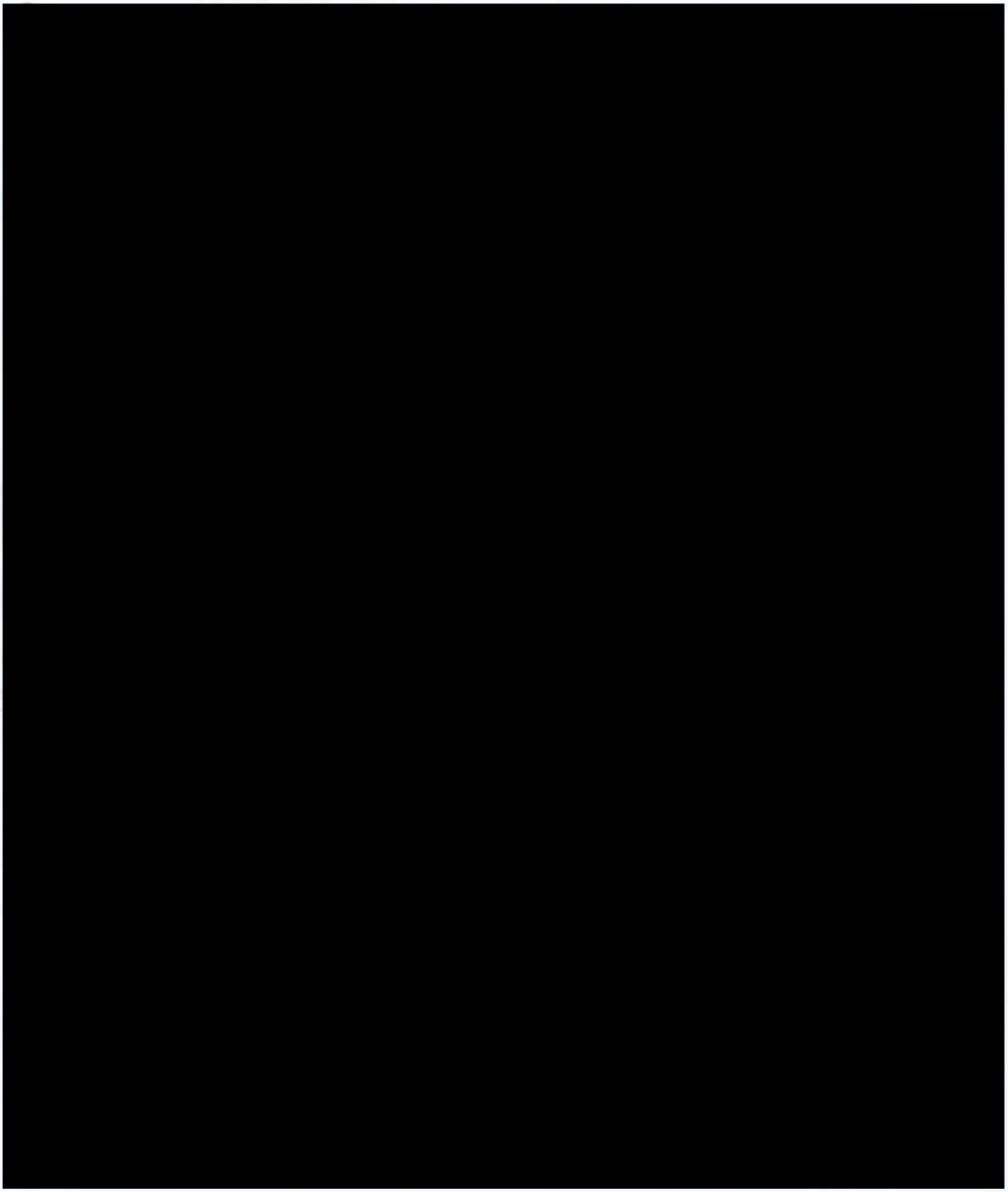

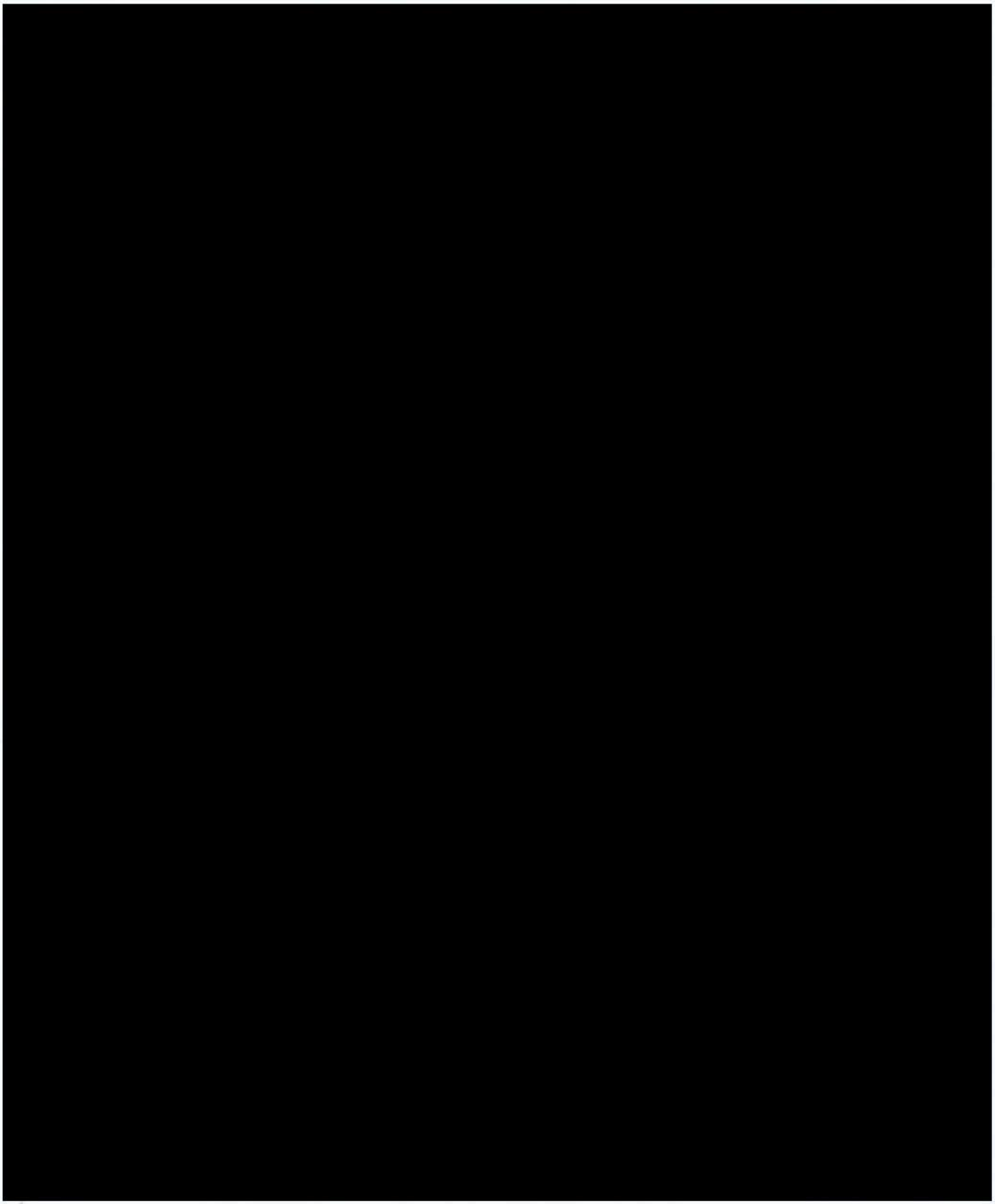

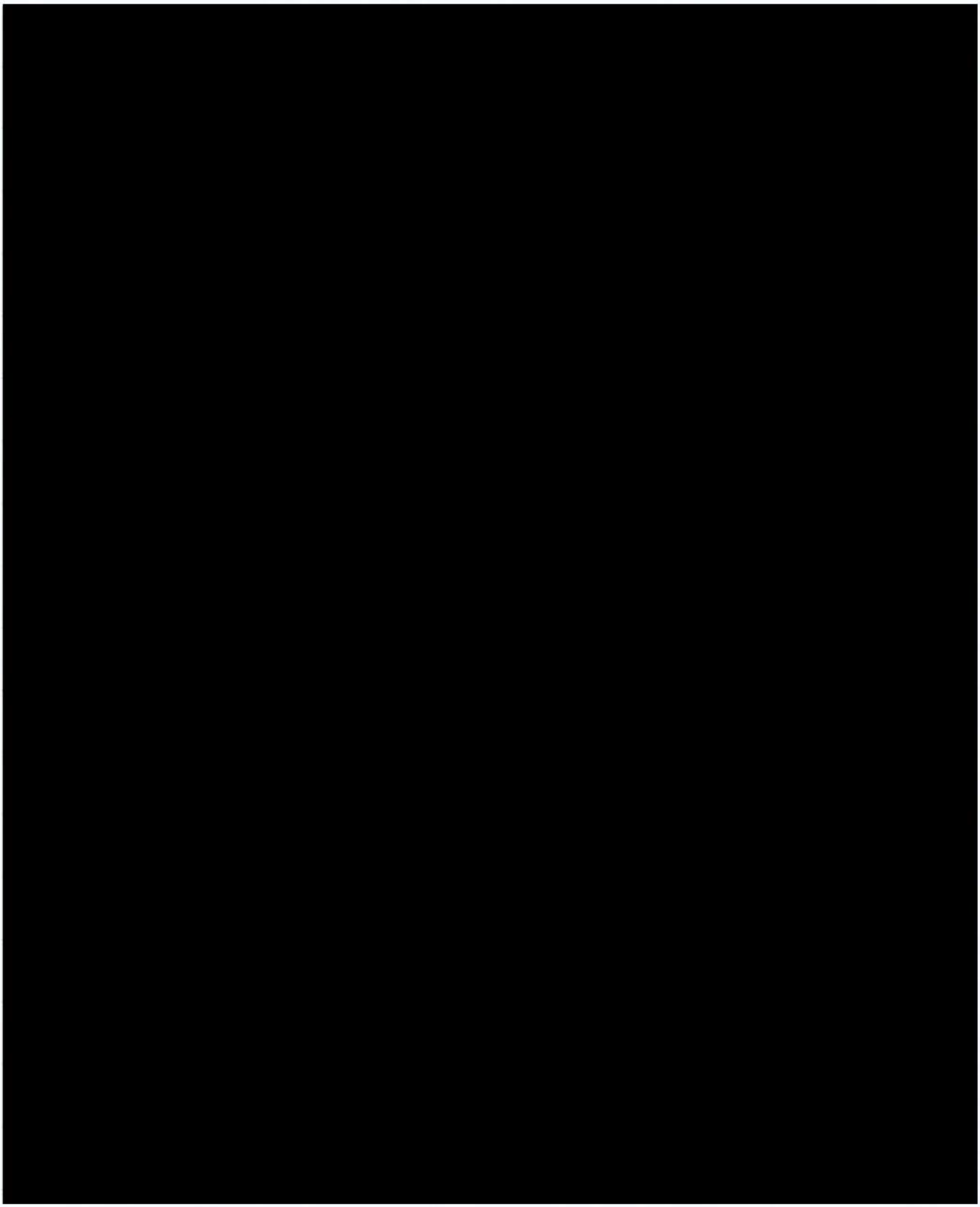

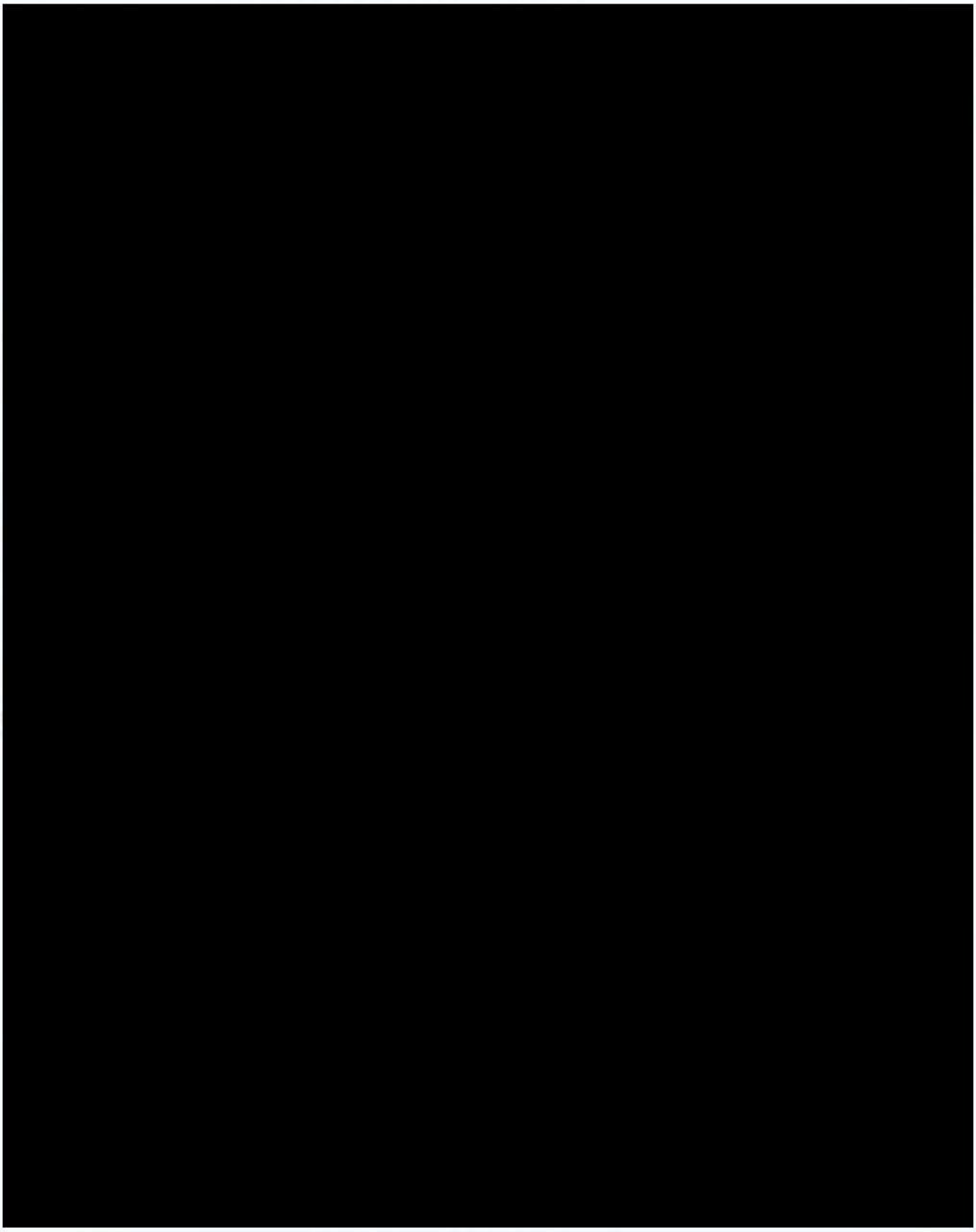

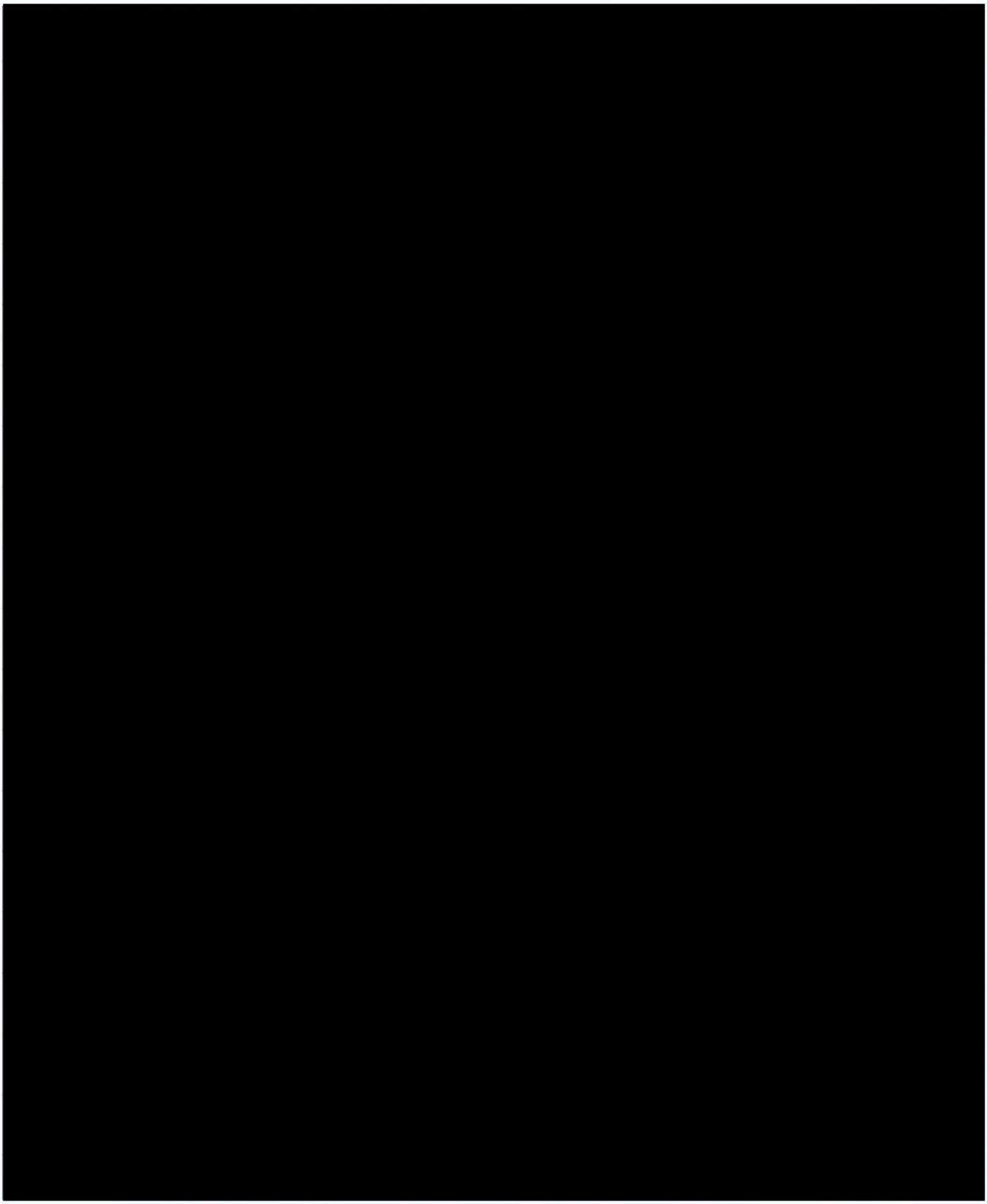

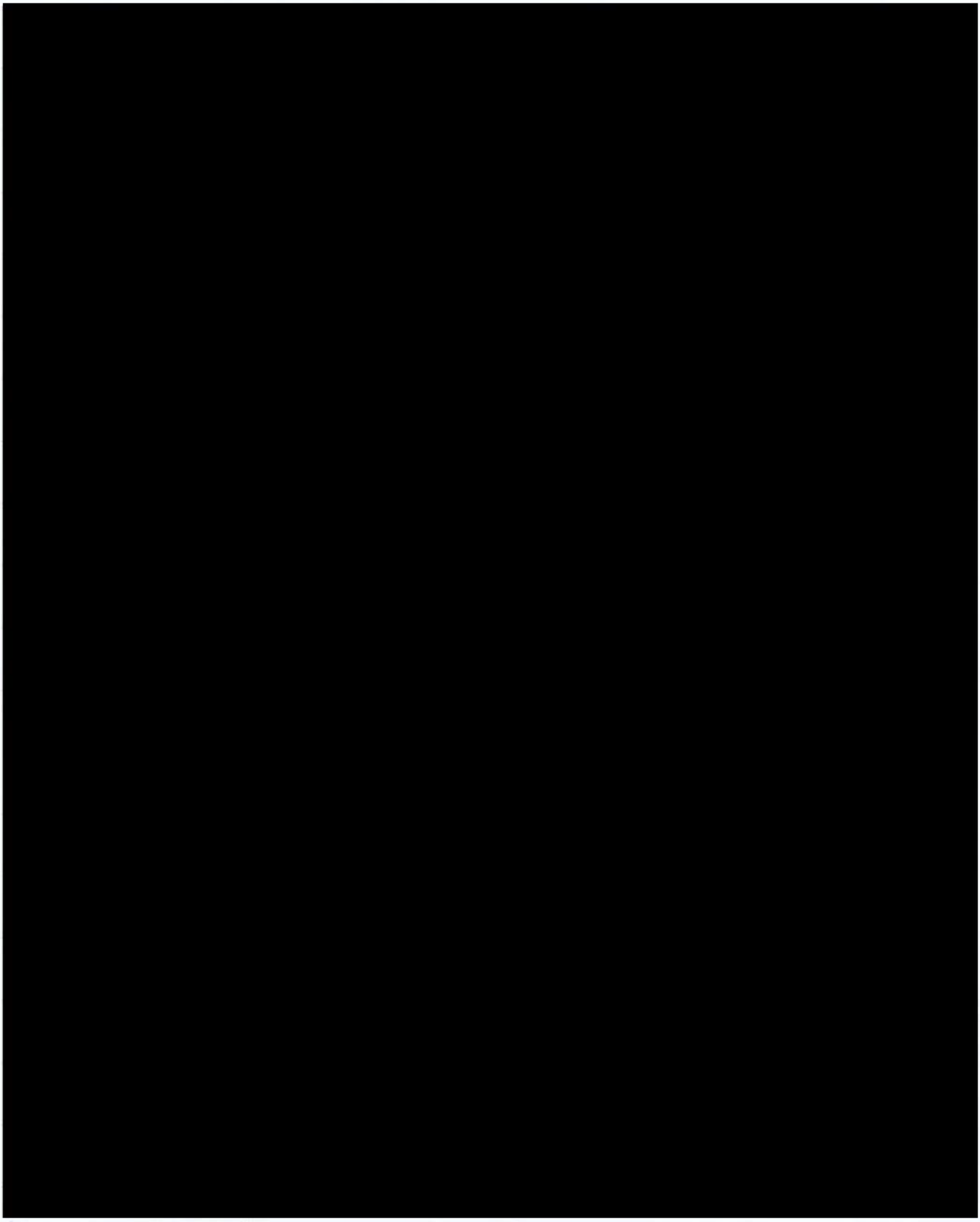

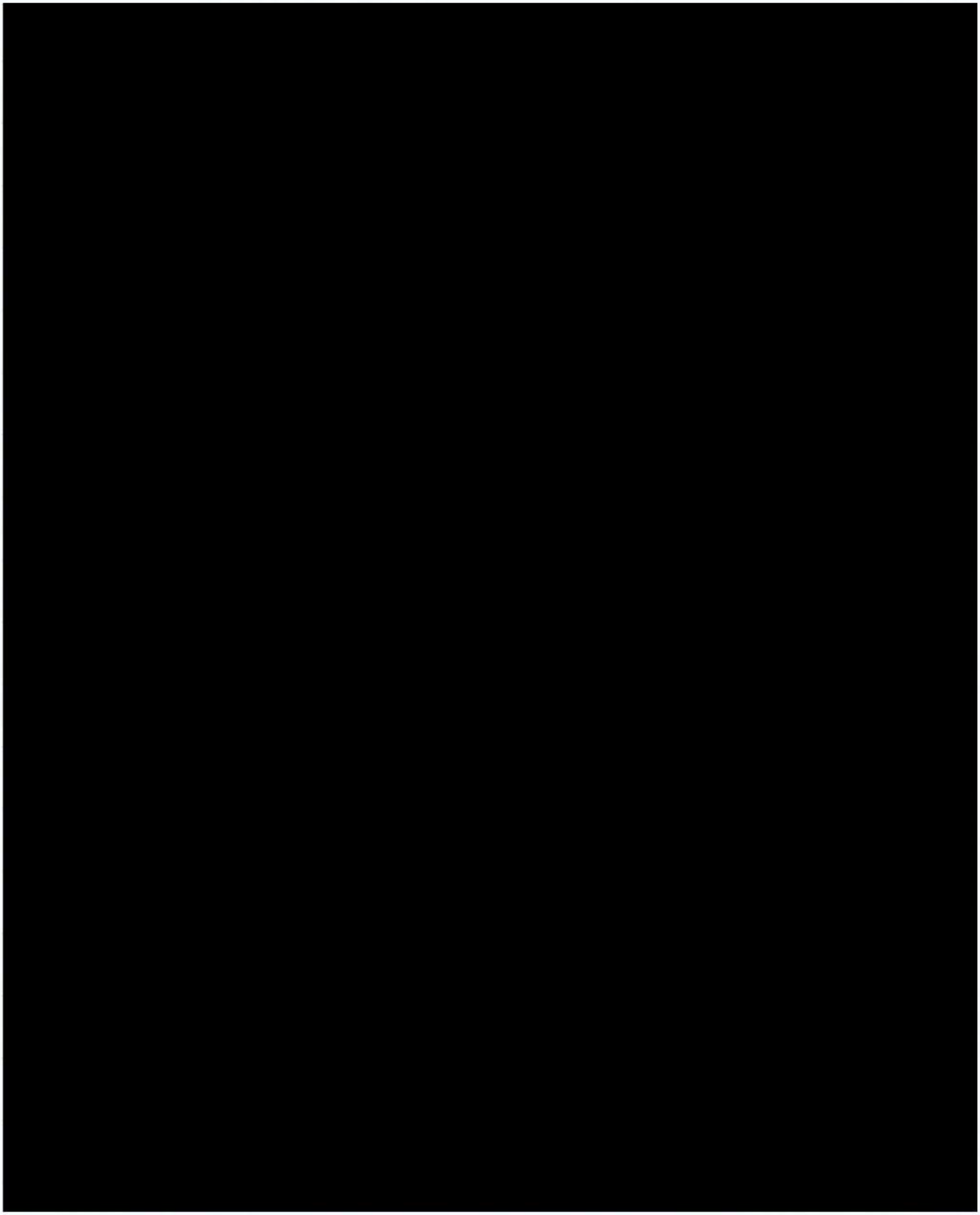

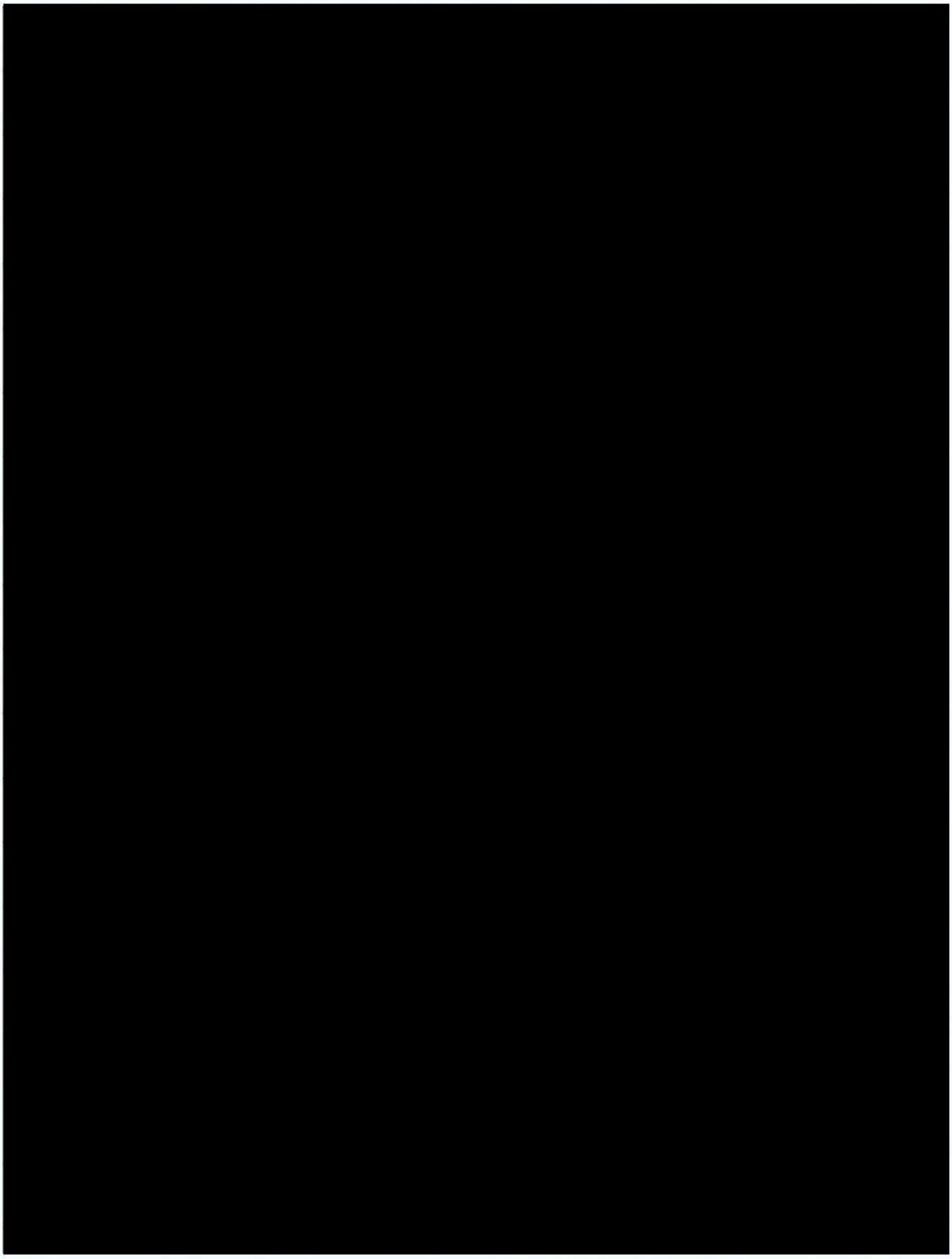

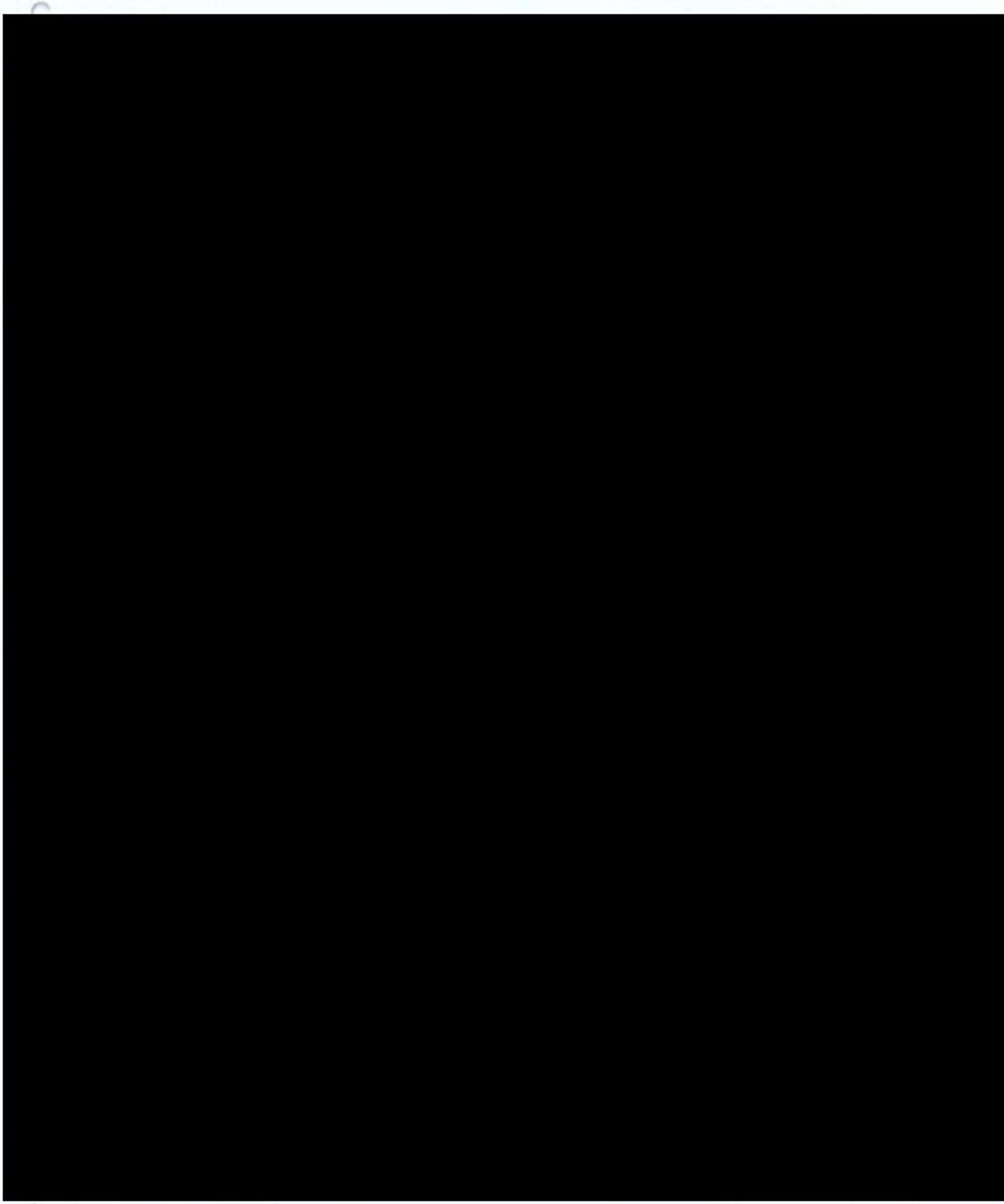

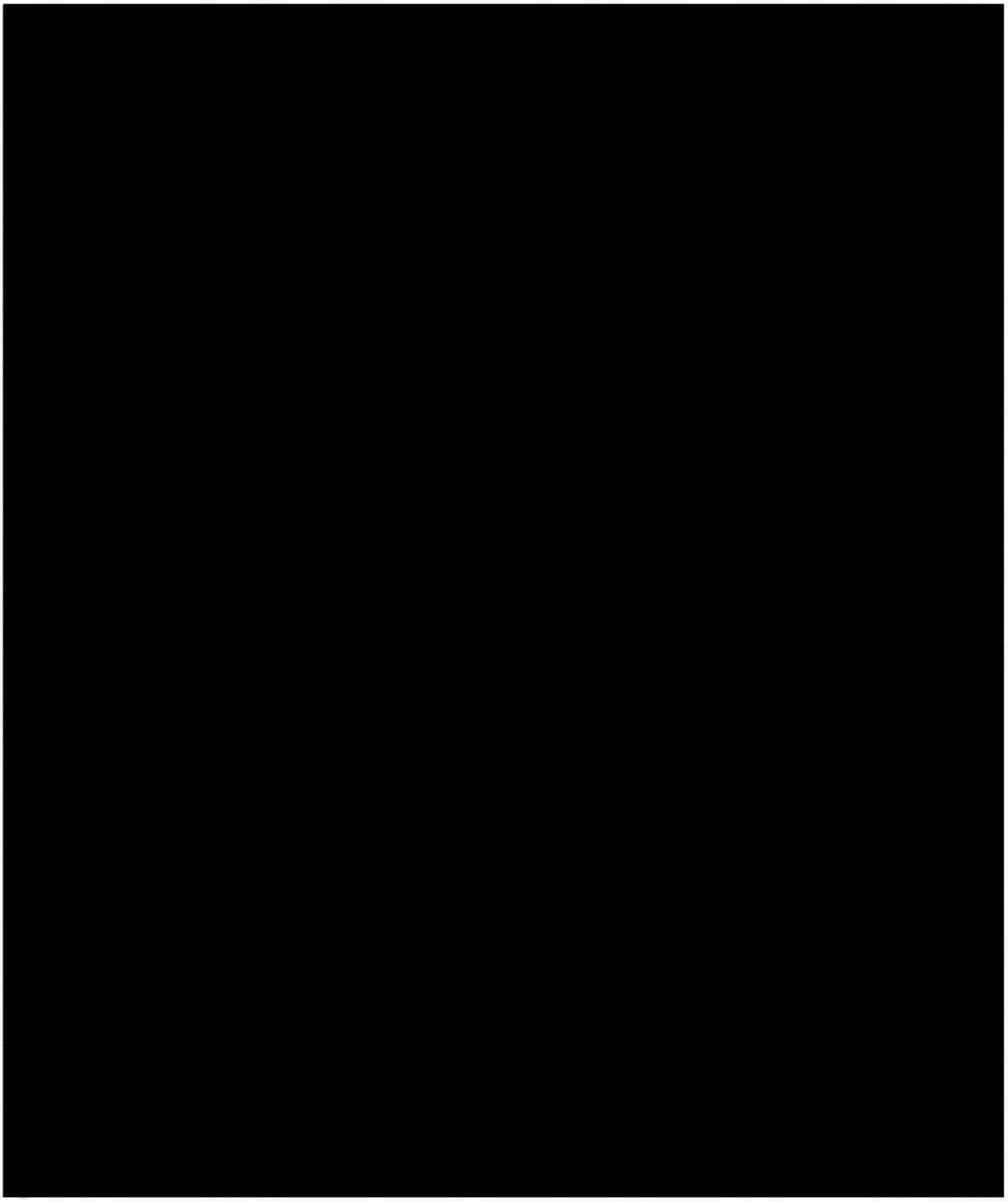

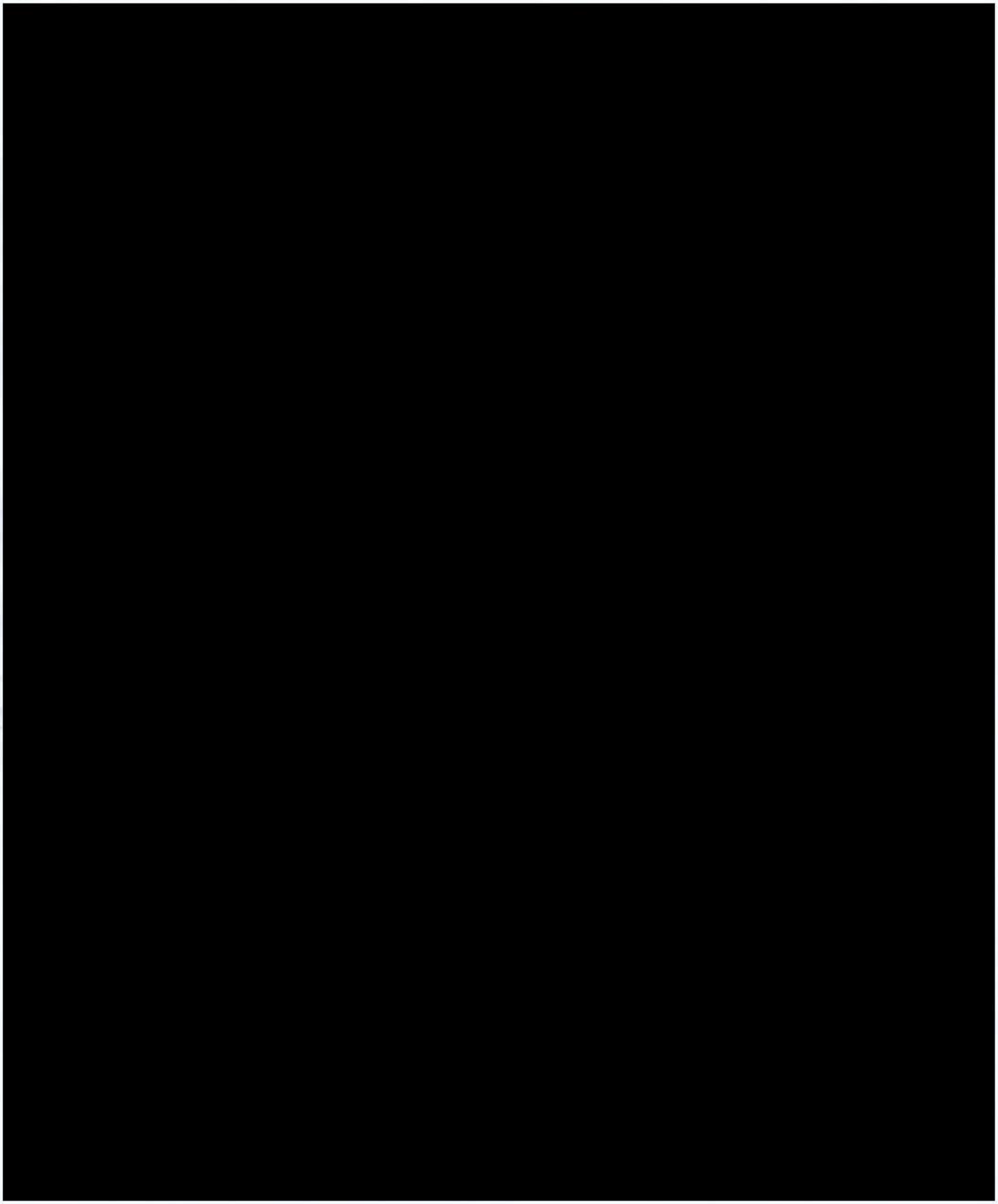

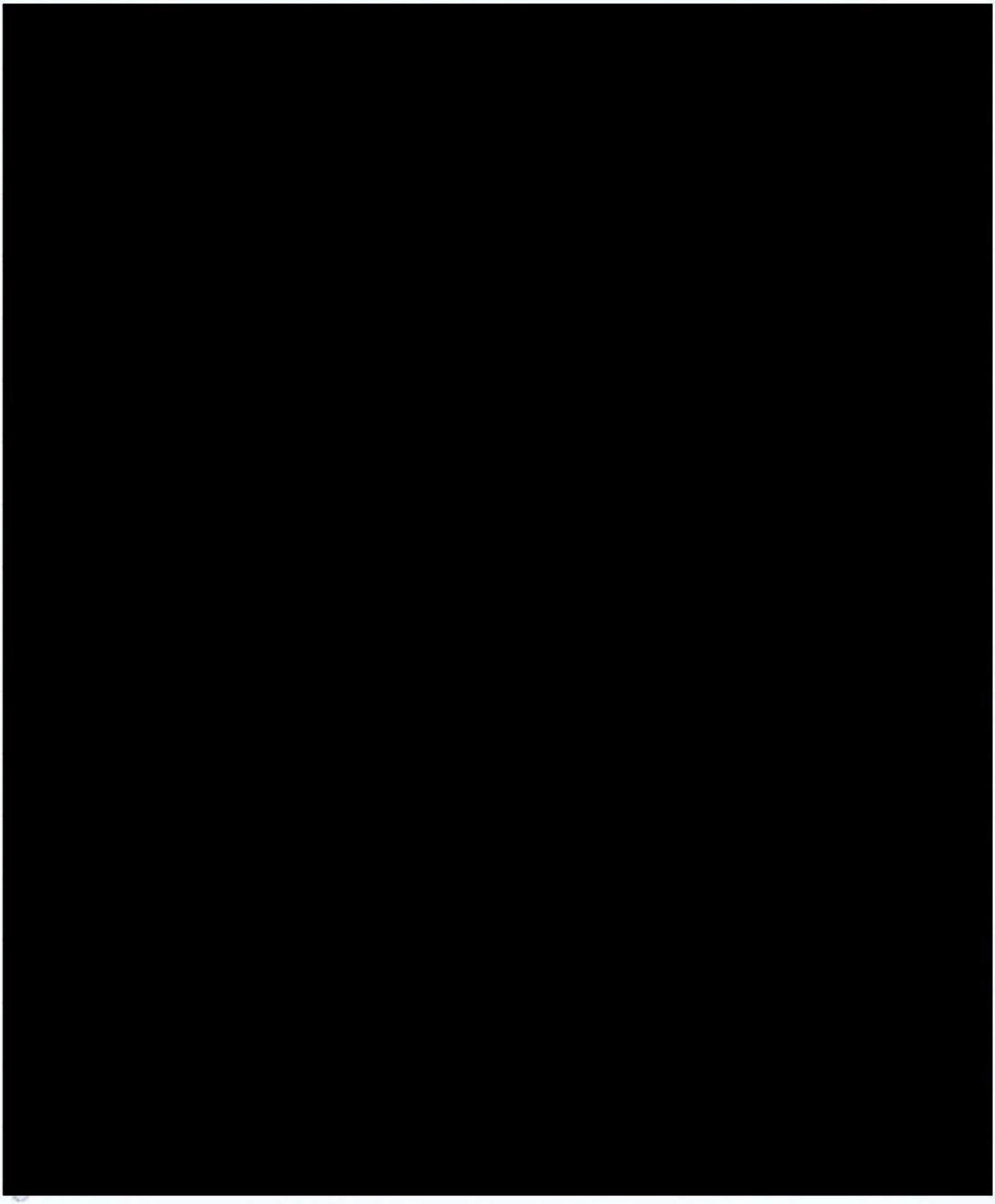

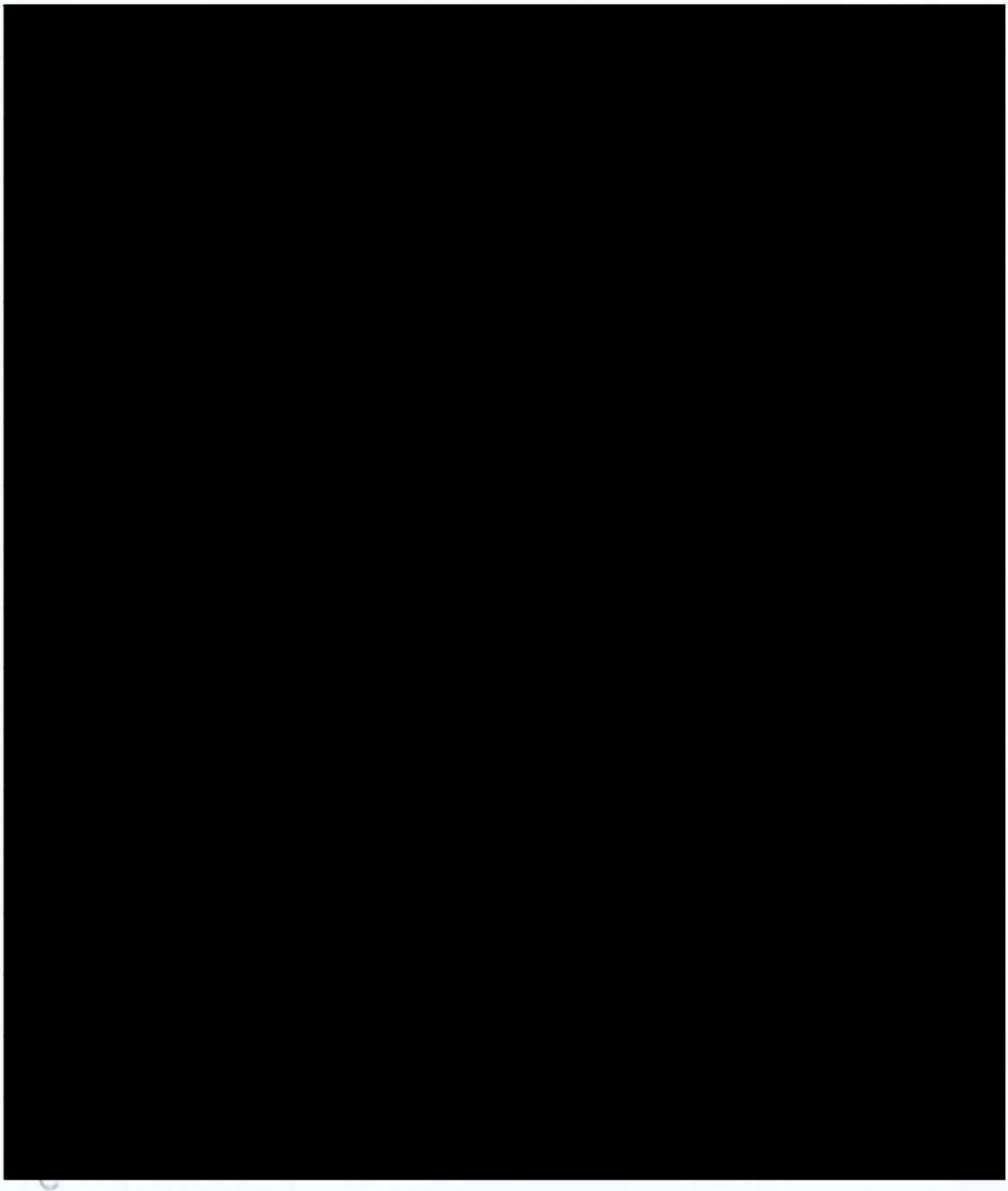

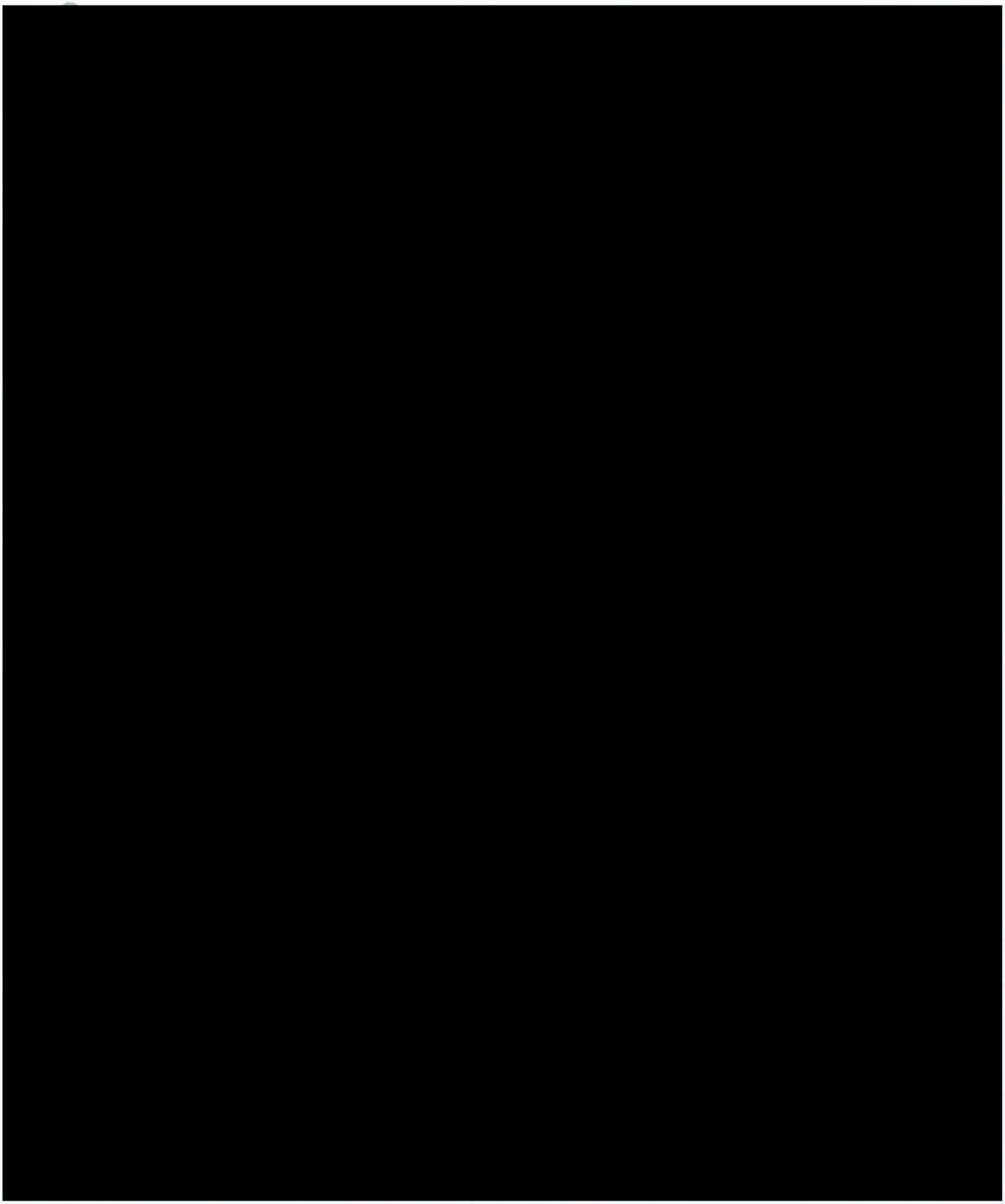

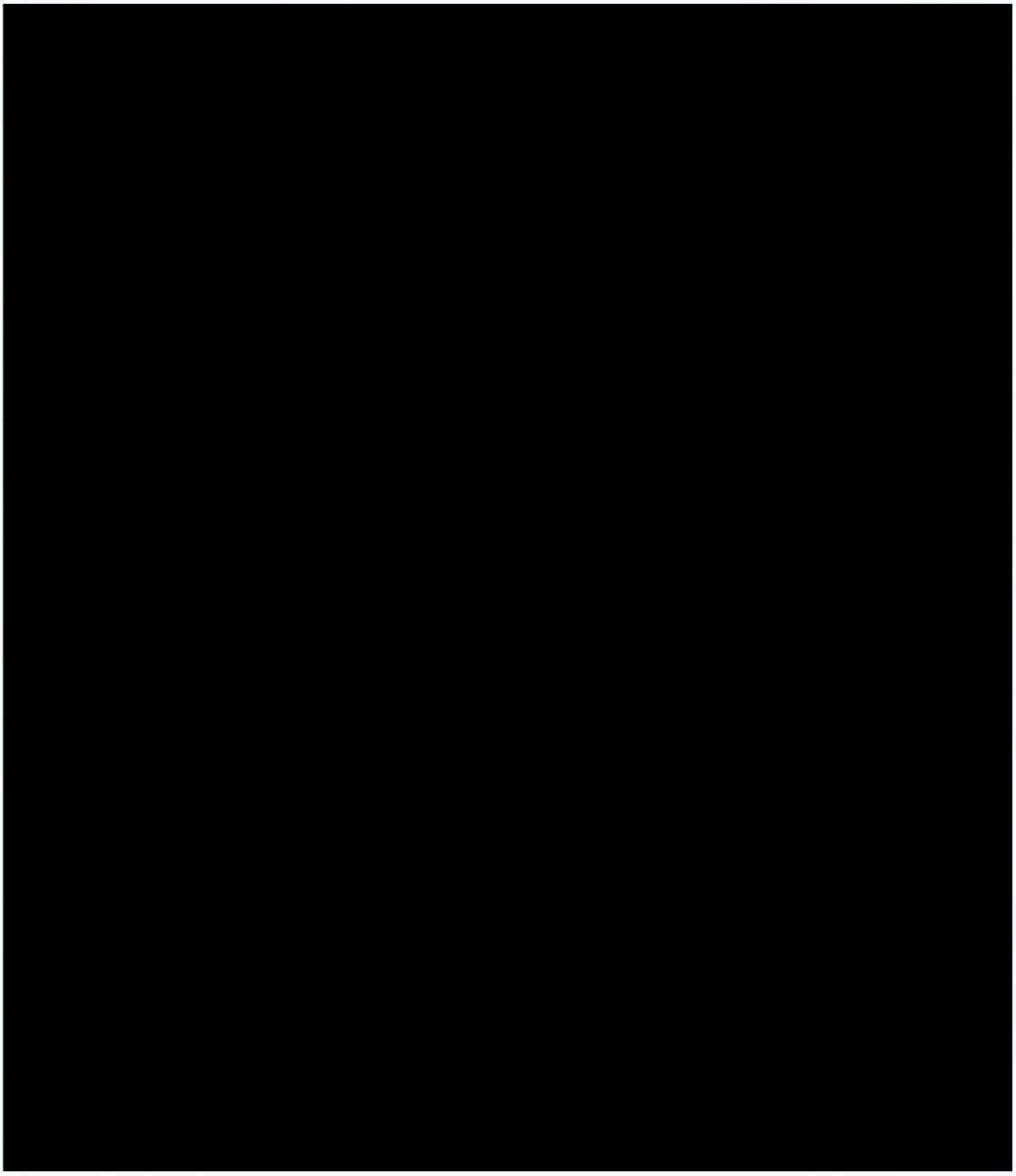

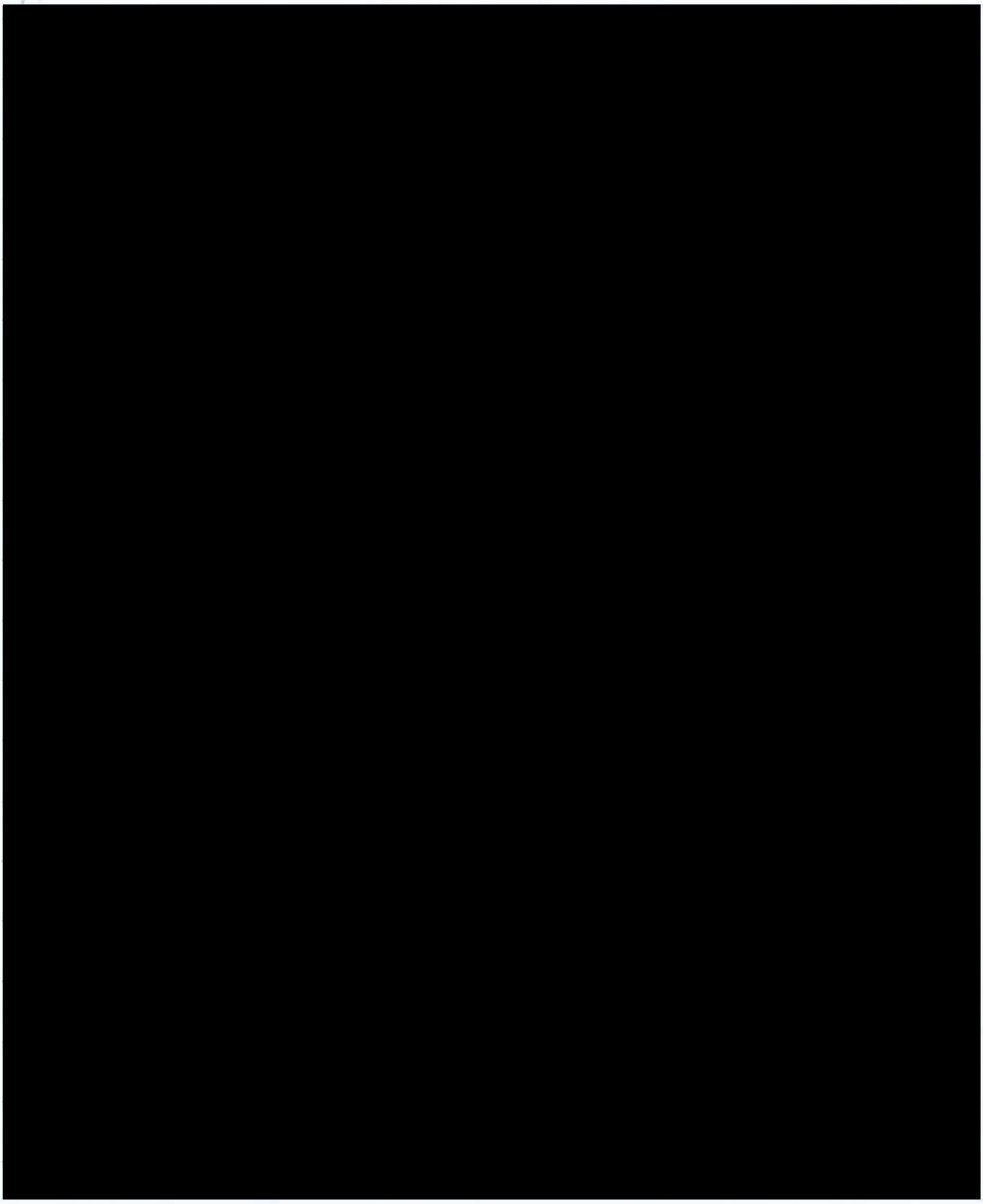

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Plotted Scale - 1:750. Paper Size – A4

Title Number: WA552132

The electronic official copy of the register follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.

Official copy of register of title

Title number LL317736 | Edition date 25.07.2019

- This official copy shows the entries on the register of title on 08 OCT 2024 at 11:32:58.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 08 Oct 2024.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Kingston Upon Hull Office.

A: Property Register

This register describes the land and estate comprised in the title.

LINCOLNSHIRE : LINCOLN

1 (07.05.1976) The Freehold land shown edged with red on the plan of the above title filed at the Registry and being Land on the north side of Sadler Road, Lincoln.

2 There are excluded from this registration the mines and minerals excepted by the Conveyance dated 6 April 1939 referred to in the Charges Register in the following terms:-

Excepting and reserving unto the Vendor in fee simple

(a) All coal and mines of coal under any of the premises hereby assured together with all property and rights annexed to such coal and mines of coal as by the operation of the Coal Act 1938 will on the first July one thousand nine hundred and forty two become vested in the Coal Commission and

(b) Such right to withdraw support from the land hereby assured as by the operation of Section 4(3) of the Coal Act 1938 will on the first July One thousand nine hundred and forty two become vested in the Coal Commission but subject to the right of the Purchaser to reserve such compensation for surface damage as is payable by the Coal Commission under the provisions of the said Act and so nevertheless that the Vendor shall not be entitled to exercise such right to withdraw support from the surface prior to the first July one thousand nine hundred and forty two and

(c) Any sum or sums of money or other consideration which may become due or payable in respect of compensation or otherwise under the Coal Act 1938 or any existing or future Act or Acts of Parliament in respect of the compulsory acquisition of such coal and mines of coal.

3 The land tinted pink on the title plan has the benefit of the following rights granted by a Conveyance of the land lying to the east of the land in this title dated 14 January 1975 made between (1) Lorona Trading Co. Limited (Vendor) and (2) Lamport And Holt Line Limited:-

THERE is excepted and reserved in fee simple to the Vendor and its successors in title the owners and occupiers for the time being of the land shown edged green on the Plan annexed hereto marked A (hereinafter

A: Property Register continued

called "the Estate") the rights mentioned in the Second Schedule hereto

SECOND SCHEDULE

(1) The right within Eighty years from the date of this Conveyance to enter on the Property for the purpose of laying within that period pipes sewers drains ducts conduits cables and wires ("the services") within 50 feet from Doddington Road between the eastern and western boundaries of the land to serve the Estate and the right of the free passage and running of water soil steam gas and electricity to and from the Estate and any buildings for the time being thereon through and along such Services when constructed and to make connections thereto with power for the Vendor and its successors in title owner or owners of such adjoining properties or any part or parts thereof to enter on the Property for the purpose of cleansing repairing and renewing the said sewers and drains or any of them doing as little damage as possible to the Property in the exercise of the rights mentioned in this paragraph and making good the surface of the Property without unnecessary delay at its own cost.

(2) The full and uninterrupted access and enjoyment of light and air in perpetuity and the right of the Vendor and other the owners and occupiers for the time being of the Estate to deal as it or they may think fit with such property and to erect or allow to be erected thereon any buildings whatsoever whether or not such buildings shall affect or diminish the light or air which may now or at any time or times during the period of 80 years from the date of this Conveyance be enjoyed by the Vendor and the owners or occupiers for the time being of the Estate.

NOTE: The land in this title is included within the land edged green referred to above.

4 The land has the benefit of the rights granted by but is subject to the rights reserved by the Transfer dated 8 March 1979 referred to in the Charges Register.

5 The land has the benefit of the rights granted by but is subject to the rights reserved by the Transfer dated 9 August 1984 referred to in the Charges Register.

6 (07.11.2006) The land tinted pink on the title plan has the benefit of the rights granted by but is subject to the rights reserved by a Transfer of land adjoining the western boundary of the land in this title and other land dated 24 August 2006 made between (1) Lincoln Corn Exchange and Markets (1991) Limited and (2) British Overseas Bank Limited and WFTC Nominees Limited.

NOTE: Copy filed under LL274915.

7 (04.06.2010) The land has the benefit of the rights granted by but is subject to the rights reserved by a Transfer of the land in this title dated 5 May 2010 made between (1) Lincoln Corn Exchange And Markets (1991) Limited and (2) E2V Technologies (UK) Limited.

NOTE: Copy filed.

8 The restrictions covenants and other matters contained in the Property and Charges Register of title LL10172 referred to in Clause 6 of the Transfer dated 8 March 1979 are set out in the Register of this title so far as they affect the same.

9 The matters referred to in the Property and Charges Register of LL10172 mentioned in clause 4 of the Transfer dated 9 August 1984 referred to above are set out in the Register of this title so far as they affect.

10 (08.02.2011) The land edged and numbered in green on the title plan has been removed from this title and registered under the title number or numbers shown in green on the said plan.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

1 (04.06.2010) PROPRIETOR: TELEDYNE E2V (UK) LIMITED (Co. Regn. No. 00432014) of 106 Waterhouse Lane, Chelmsford, Essex CM1 2QU.

2 (04.06.2010) The price stated to have been paid on 5 May 2010 was £955,000 plus £167,125 VAT.

C: Charges Register

This register contains any charges and other matters that affect the land.

1 The land tinted pink is subject to rights of drainage and rights in respect of water steam soil gas and electricity supply services.

2 By a Conveyance of the land in this title and other land dated 6 April 1939 made between (1) The Right Honourable Arthur William de Brito Savile Earl of Liverpool and (2) Thomas Place such part of the land as was affected thereby was conveyed subject to a yearly rentcharge of £50 for the maintenance of the Mathematical School of Christ's Hospital. The said Conveyance also contains an assignment of the benefit of the covenant by the Governors of Christ's Hospital to pay the said rentcharge and to keep the purchaser indemnified contained in a Conveyance dated 25 June 1908 made between (1) The Governors of Christ's Hospital and (2) The Earl of Liverpool.

NOTE: No further particulars of this rentcharge were supplied on first registration.

3 A Conveyance of the land in this title and other land dated 19 January 1945 made between (1) Thomas Place and T Place Trust Limited (Vendors) and (2) George Henry Hobbins (Purchaser) contains the following covenants:-

"THE Purchaser hereby covenants with the Vendors that he the Purchaser and his successors in title will not for a period of fifty years from the date hereof sell any of the sand or gravel in or under the said Close of land hereby conveyed coloured pink and blue on the said plan and also that he or they will not erect any houses or buildings of any description on the portion of the said close of land hereby conveyed fronting to the Doddington Road and coloured pink on the said plan to a depth of Two hundred and ten feet therefrom. And also that he or they will not sell any of the land comprised in the Fifty years frontage to the said Doddington Road and coloured blue on the said plan (which is excluded from the buildings restriction affecting the frontage of the said land to the Doddington Road coloured pink on the said plan) at a less price than that at which the Vendors sell their adjoining land."

NOTE: The land in this title forms part of the land coloured pink referred to and is not affected by the land coloured blue referred to. The blue broken line does not affect the land in this title

By a Deed dated 14 January 1975 made between (1) Thomas William Granville Place and T Place Trust Limited (Present Covenantees) and (2) Lorona Trading Co Limited (Company) the said covenants were expressed to be released in the following terms:-

"THE Present Covenantees hereby release the Company and its successors in title and the premises and every part thereof from the Covenants so far as the same are subsisting and capable of being enforced."

4 The land tinted pink on the title plan is subject to the following rights reserved by a Conveyance of the land in this title and other land dated 4 July 1973 made between (1) George Henry Hobbins (Vendor) and (2) Lindum Securities Limited:-

"EXCEPT AND RESERVED unto the Vendor and the owners and occupiers from time to time of the retained premises (a) the free and uninterrupted

C: Charges Register continued

right of running pure and foul water to and from the retained premises and through the pipes and sewers now or at any time within the period of 80 years from the date hereof laid under the land AND the right to connect onto the same (b) the right to drain surface water from the retained premises into such part of the Prial Drain as is included in the land.

PROVIDED that the Vendor shall not be liable for any payment towards the maintenance of such part of the Prial Drain."

5 The land tinted blue on the title plan is subject to the following rights reserved by a Conveyance of the land in this title and other land dated 4 July 1973 made between (1) George Henry Hobbins (Vendor) and (2) Lindum Securities Limited:-

"EXCEPT AND RESERVED unto the Vendor and the owners and occupiers from time to time of the retained premises (a) the free and uninterrupted right of running pure and foul water to and from the retained premises and through the pipes and sewers now or at any time within the period of 80 years from the date hereof laid under the land AND the right to connect onto the same."

6 A Transfer of the land tinted pink on the title plan and other land dated 8 March 1979 made between (1) Lorona Trading Co. Limited and (2) A E I Semi Conductors Limited contains restrictive covenants.

NOTE 1: A Copy of the Agreement dated 5 September 1974 referred to in the above Transfer is filed under LL16432.

NOTE 2: Copy of the Transfer is filed under LL16432.

7 The Transfer dated 8 March 1979 referred to above contains the following covenant by the Transferor:-

"THE Transferor hereby further covenants on behalf of itself and its successors in title of the retained land and the occupiers thereof for the benefit of the Transferee and its successors in title of the land hereby transferred and each and every part thereof not to use or permit the retained land to be used for any noxious noisy dangerous dust making or offensive trade or business."

8 A Transfer of the land tinted blue on the title plan and other land dated 9 August 1984 made between (1) Lorona Trading Co. Limited and (2) Marconi Electronic Devices Limited contains restrictive covenants.

NOTE: Copy filed under LL29849.

9 (12.11.1993) The parts of the land affected thereby are subject to the following rights granted by a Deed dated 28 October 1993 made between (1) AEI Semi Conductors Limited (Grantor) and (2) East Midlands Electricity Plc (Grantee):-

"The Grantor as Beneficial Owner hereby grants unto the Grantee FULL RIGHT AND LIBERTY (i) to enter upon break open and excavate under the Grantors Premises in the position indicated on the plan annexed hereto (hereinafter called "the underground cable land") and to lay place use inspect repair maintain renew replace remove or render unusable electric lines within the meaning of Section 64 of the Electricity Act 1989 therein and thereunder (ii) to enter upon land of the Grantor adjoining the route of the electric lines as may be necessary for any of the purposes aforesaid and (iii) to enjoy the benefit of support for the electric lines from the subjacent and adjacent land of the Grantor TO HOLD the same unto the Grantee in fee simple as appurtenant to its statutory electricity undertaking"

The said Deed also contains the following covenants by the Grantor:-

"THE GRANTOR hereby covenants with the Grantee with the intent and so as to bind the underground cable land into whosesoever hands the same may come and for the benefit and protection of the said electric lines and the Grantees statutory electricity undertaking as follows:-

(a) Not to erect or place any part of any dwellinghouse building structure or other erection or plant or materials on over or within one

C: Charges Register continued

metre on either side of the route of the said electric lines save as existing at the date hereof

(b) Not to alter by any activity whatsoever the level of the underground cable land which shall remain at the level as exists at the date hereof

(c) Not to do or cause or permit to be done on the underground cable land anything calculated or likely to cause damage or injury to the said electric lines and to take all reasonable precautions to prevent such damage or injury

4. IF the Grantor at any time hereafter wishes to redevelop the Grantor's premises and cannot reasonably do so by reason of the presence of the said electric lines then if the Grantor shall give to the Grantee six month's prior notice in writing and shall without further consideration grant to the Grantees easements in the form herein contained along a substituted route through the Grantor's premises acceptable to the Grantee and subject to provisions as herein contained (other than this provision) then the Grantee shall as soon as reasonably possible and at the joint and equal expense of the Grantor and the Grantee relocate the said electric lines upon the substituted route"

NOTE: The underground cable land referred to is shown by a brown broken line on the filed plan"

10 (08.11.1993) The land tinted blue on the title plan is subject to the rights granted by a Deed of Grant dated 28 October 1993 made between (1) Marconi Electronic Devices Limited and (2) East Midlands Electricity PLC.

The said Deed also contains restrictive covenants by the grantor.

NOTE: Copy filed under LL29849.

11 (11.06.2003) The land is subject to the easements granted by a lease of Land on the South West side of Doddington Road, Lincoln dated 25 March 2003 for a term of 25 years from 25 March 2003 determinable as therein mentioned and made between (1) Lincoln Corn Exchange & Markets (1991) Limited and (2) Dynex Semiconductor Limited.

¬Copy filed under LL228856.

12 (25.09.2006) The land is subject to the easements granted by a lease of 991 Doddington Road, Lincoln dated 23 June 2006 for a term of 15 years from 16 June 2006 and made between (1) Lincoln Corn Exchange & Markets (1991) Limited and (2) Simons Group Limited.

¬Copy filed under LL273923.

13 (11.12.2006) The land is subject to the easements granted by a lease of Land on the north side of Sadler Road, Lincoln dated 9 August 2006 for a term of 10 years from 9 August 2006 and made between (1) Lincoln Corn Exchange & Markets (1991) Limited and (2) Simons Group Limited.

¬Copy filed under LL276909.

14 (01.05.2007) The land is subject to the easements granted by a lease of Warehouse and Offices on the north side of Sadler Road, Lincoln dated 23 April 2007 for a term of 10 years from 26 March 2007 and made between (1) Lincoln Corn Exchange & Markets (1991) Limited and (2) Simons Group Limited.

¬Copy filed under LL282330.

15 (16.04.2009) The land is subject to the easements granted by a lease of Land on the north side of Sadler Road, Lincoln dated 13 March 2009 for a term of 15 years from and including 27 March 2009 and made between (1) Lincoln Corn Exchange & Markets (1991) Limited and (2) Booker Limited.

¬Copy filed under LL306619.

C: Charges Register continued

16 (08.02.2011) A Transfer of the land edged and numbered LL323520 in green on the title plan dated 1 February 2011 made between (1) E2V Technologies (UK) Limited and (2) Central Networks East Plc contains transferor's restrictive covenants.

NOTE:-Copy filed under LL323520.

17 (08.02.2011) The land is subject to the rights granted by the Transfer dated 1 February 2011 referred to above.

End of register

These are the notes referred to on the following official copy

The electronic official copy of the title plan follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.

This official copy was delivered electronically and when printed will not be to scale. You can obtain a paper official copy by ordering one from HM Land Registry.

This official copy is issued on 08 October 2024 shows the state of this title plan on 08 October 2024 at 11:32:58. It is admissible in evidence to the same extent as the original (s.67 Land Registration Act 2002). This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground.
This title is dealt with by the HM Land Registry, Kingston Upon Hull Office .

HM Land Registry
Official copy of title plan

Title number **LL317736**
Ordnance Survey map reference **SK9268SE**
Scale **1:2500**
Administrative area **Lincolnshire : Lincoln**

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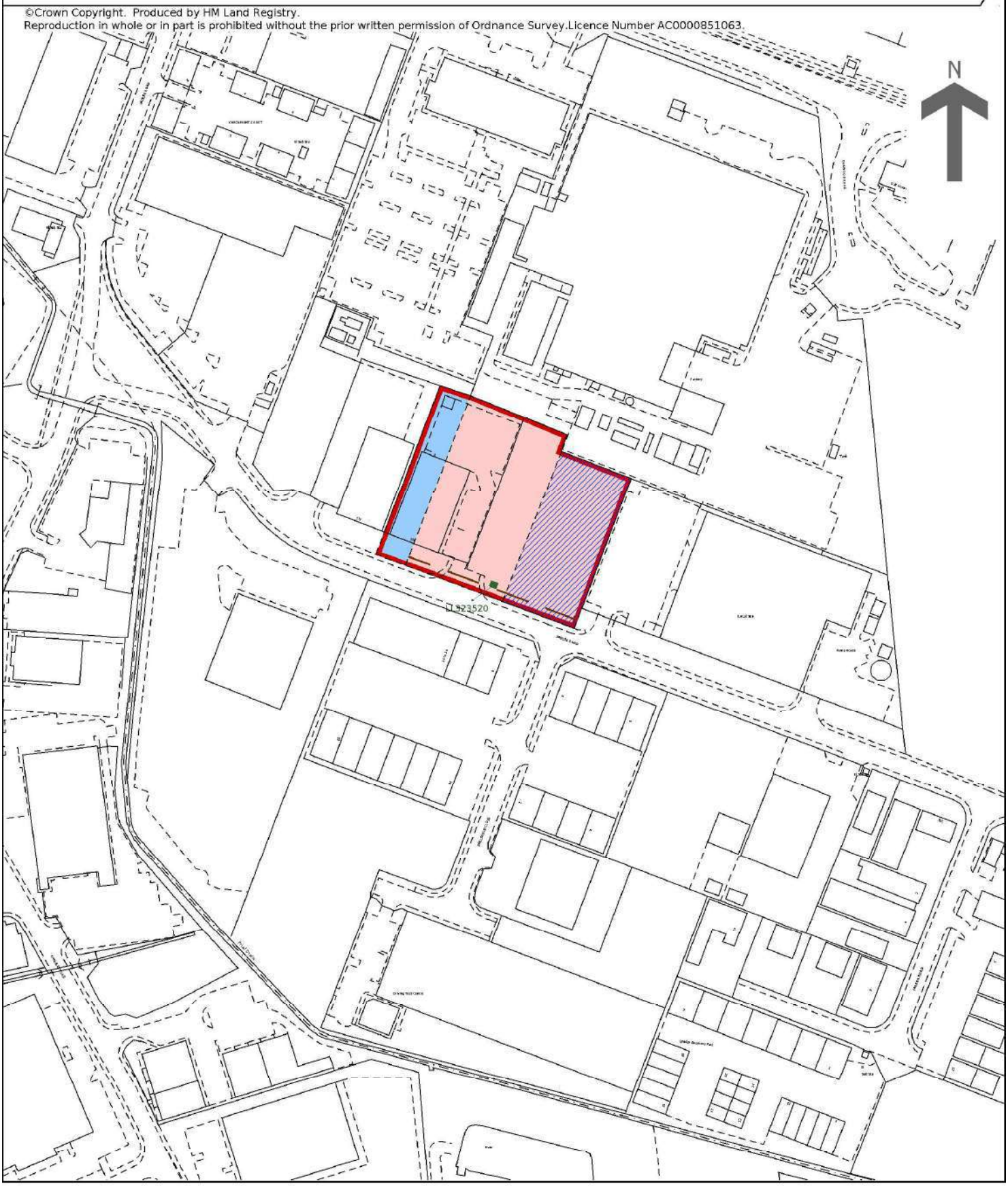

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Promap
LANDMARK INFORMATION

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Plotted Scale - 1:1250. Paper Size – A4

Title Number: LL317736

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Official copy of register of title

Title number BK365055 | Edition date 11.05.2021

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- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 03 Dec 2024.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Gloucester Office.

A: Property Register

This register describes the land and estate comprised in the title. Except as mentioned below, the title includes any legal easements granted by the registered lease but is subject to any rights that it reserves, so far as those easements and rights exist and benefit or affect the registered land.

WEST BERKSHIRE

1 (02.11.2000) The Leasehold land shown edged with red on the plan of the above Title filed at the Registry and being Navigation House, Canal View Road, Newbury (RG14 5UR).

2 (25.09.2000) Short particulars of the lease(s) (or under-lease(s)) under which the land is held:
Date : 2 November 2000
Term : 25 years from 25 August 2000
Rent : £190,000 subject to review and service rent
Parties : (1) Norwich Union Life & Pensions Limited
(2) Reynolds Industries Limited
NOTE: The Lease contains provisions relating to determination as therein mentioned

3 (25.09.2000) There are excepted from the effect of registration all estates, rights, interests, powers and remedies arising upon, or by reason of, any dealing made in breach of the prohibition or restriction against dealings therewith inter vivos contained in the Lease.

4 (25.09.2000) The landlord's title is registered.

5 Unless otherwise mentioned the title includes any legal easements granted by the registered lease(s) but is subject to any rights that it reserves, so far as those easements and rights exist and benefit or affect the registered land.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

B: Proprietorship Register continued

1 (11.05.2021) PROPRIETOR: TELEDYNE UK LIMITED (Co. Regn. No. 00432014) of 106 Waterhouse Lane, Chelmsford CM1 2QU.

2 (11.05.2021) The Transfer to the proprietor contains a covenant to observe and perform the covenants referred to in the Charges Register and of indemnity in respect thereof.

C: Charges Register

This register contains any charges and other matters that affect the land.

1 (25.09.2000) The land is subject to the following rights reserved by a Conveyance of the freehold estate in the land in this title and other land dated 10 May 1977 made between (1) Frederick Charles Grahame Hill and others (Vendors) and (2) Redpath Durman Long Limited (Purchasers):-

"Except and Reserving unto the Vendors the right to the free passage and running of water through the watercourses now existing or hereafter within a period of 80 years from the date hereof to be formed or constructed on the said land."

End of register

These are the notes referred to on the following official copy

The electronic official copy of the title plan follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.

This official copy was delivered electronically and when printed will not be to scale. You can obtain a paper official copy by ordering one from HM Land Registry.

This official copy is issued on 03 December 2024 shows the state of this title plan on 03 December 2024 at 19:00:14. It is admissible in evidence to the same extent as the original (s.67 Land Registration Act 2002). This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground.
This title is dealt with by the HM Land Registry, Gloucester Office .

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TITLE NUMBER

BK365055

WEST BERKSHIRE

N

ORDNANCE SURVEY MAP REFERENCE: SU4867SE

SCALE 1:1250

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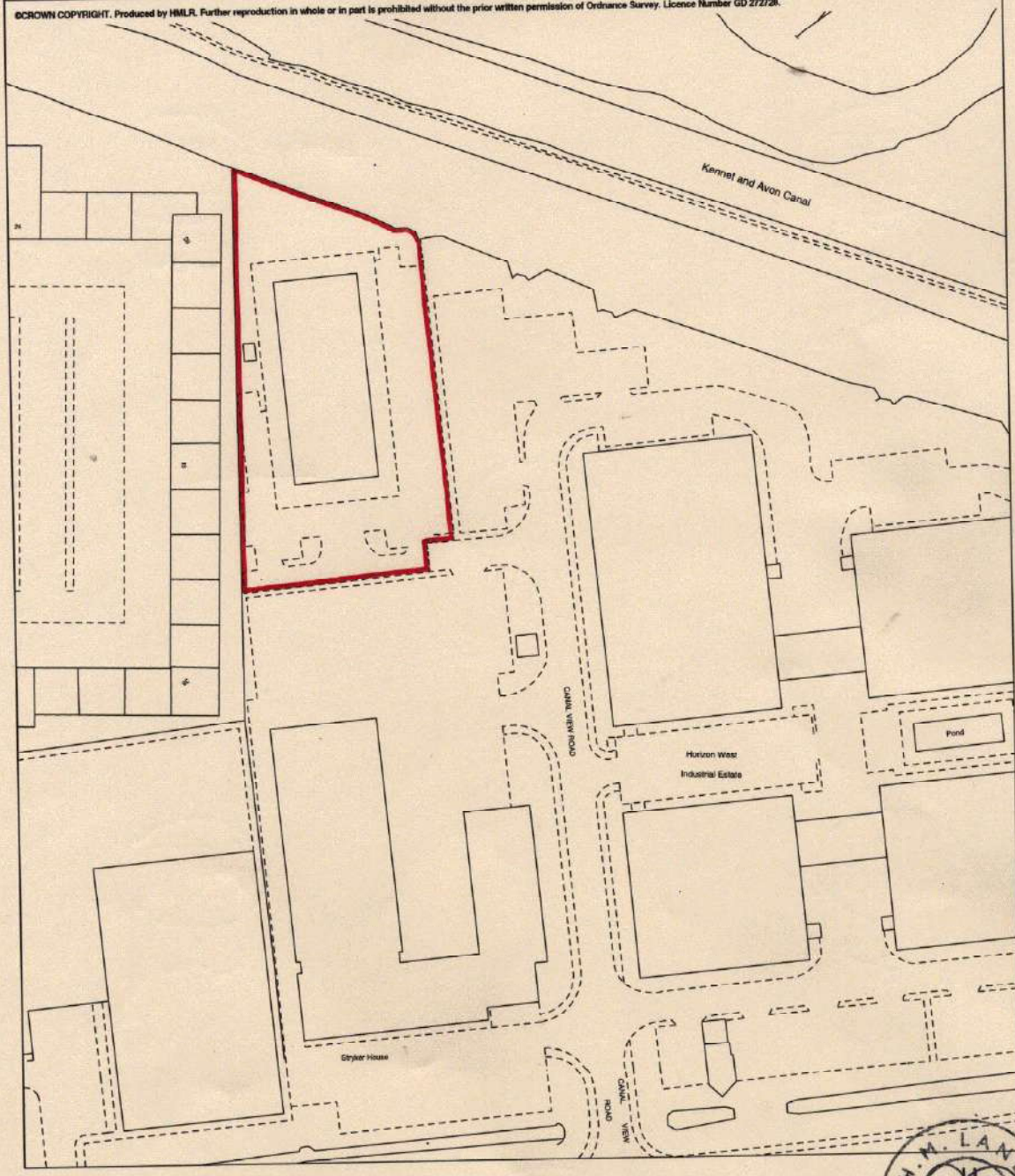

H.M. LAND REGISTRY 1000

This official copy is incomplete without the preceding notes page.

Promap
LANDMARK INFORMATION
© Crown Copyright and database rights 2024. OS AC0000813445
Plotted Scale - 1:750. Paper Size – A4

Title Number: BK365055

PALESTINE ACTION

Four arrested after they occupy Manchester tech company connected to Israel's weapons trade

Jul 1, 2024

Images and videos which are free to use uploaded here

Four activists were arrested this afternoon after they targeted another link in Britain's chain of complicity with Israel's genocide in Gaza, as the Manchester offices of 'CDW UK' were severely disrupted by an activist blockade.

Elbit Systems, Israel's largest weapons company, are facilitated in their British presence by support from CDW's software and technology services, and so, as part of a nationwide campaign against complicity in Israeli atrocities, activists used a vehicle and lock-on device to blockade the back entrance whilst one occupied the ledge at the building's entry. Locals gathered in support of the action and drivers passing by repeatedly beeped their horns to express solidarity. The building was also sprayed with blood-red paint – to serve as a reminder to CDW of the Palestinian bloodshed from which their firm profits.

CDW provide supply chain management, IT solutions, cyber security and eProcurement services to the British operations of the Elbit brand, part of the global Israeli arms firm. CDW are contracted for IT services for 'Elbit Systems UK Ltd', headquartered in Bristol, from which Elbit oversees drone and arms production nation-wide. This is not the first time the company has been targeted, with activists spraying a site in Peterborough with red paint and shattering their windows.

This action follows on the heels of others taken to target Elbit's partners & suppliers. Last week activists occupied the GRiD Defence Systems site in High Wycombe, barricading themselves inside and proceeding to destroy hardware and unfurled banners. This came after activists destroyed dozens of boxes of GRiD processors found inside Elbit's Kent factory during an action, the total damage-caused estimated by police to be worth over £1million. GRiD manufactures a range of military computers, processors, and similar electronic equipment, either for direct battlefield use or to be integrated into other systems.

Since October 7th, over 38,000 Palestinians have been killed, more than 86,000 injured and the majority of the people in Gaza are now displaced. Elbit Systems supply the majority of Israel's military drone fleet, land based equipment, bullets, munitions and missiles. Their weaponry is often marketed as "battle-tested", after deployment against the people of Gaza. The genocide of Gaza would not be possible without Elbit's weaponry – and those firms, including CDW and GRiD, are made complicit by their facilitation of Elbit's deadly business.

CDW is not the first to be targeted. After similar actions, five other companies have ended their association with Elbit's deadly trade in the past two months. These include Elbit's weapons transporters Kuehne+Nagel, recruiters iO associates, property managers Fisher German, website designers Naked Creativity and legal firm MLL Legal.

Palestine Action will continue to target all those who allow Elbit to continue their business of genocide, until they declare they've cut all ties.

ENDS

NOTES TO EDITORS

If you would like any further information on Palestine action, please contact media@palestineaction.org

Palestine Action is a direct-action network of groups and individuals formed with the mandate of taking action against the sites of Elbit Systems and other companies complicit in Israeli apartheid, calling for all such sites to be shut down.

← Palestine Action activist granted bail after nearly 3 months in prison

Teledyne's Wirral Factory Breached & Damaged, F-35 Supplier Shut Down →

Dismantle the war machine | #ShutElbitDown

add_action('wp_footer', function() { ?>

Palestine Action target over 10 Barclays sites across the country

Sep 12, 2024

PRESS RELEASE, 12/09/24

FOR IMMEDIATE RELEASE

Palestine Action target over 10 Barclays sites across the country

Images and videos available for free here (More photos will be uploaded throughout the day)

Overnight, Palestine Action have targeted more than ten Barclays sites including branches, call centres and offices. The bank has been marked with symbols of their complicity in the genocide of Palestinians.

Bank premises from Edinburgh to Kent have had their windows smashed, and covered in blood-red paint, in actions which Palestine Action have vowed will continue until Barclays cease their investments in Elbit Systems – Israel's largest weapons firm, and Palestine Action's primary target. These actions follow those of June 2024, when nearly 20 branches of the arms-investing bank were smashed [1].

Confirmed targeted sites include:

- Barclays Wealth & Investment Management, 3 Hardman St, Manchester
- Barclays Bank, Royal Tunbridge Wells, TN1 2TB
- Barclays Bank, Islington, London, N1 8EH
- Barclays Bank, Whitechapel, E1 1BJ
- Barclays Bank, Mayfair, W1J 8NL
- Barclays Bank, Hammersmith, W6 9HY
- Barclays Bank, Oxford, OX1 3HB
- Barclays Bank, Edinburgh, EH2 2AN
- Barclays Bank, London, E6 2HW
- Barclays Wealth & Investment Management, Edinburgh, EH3 7LU
- Barclays Centre, Liverpool, L7 9PQ

11 months into the genocide in Gaza, in which Elbit plays a central role, Barclays still holds Elbit shares. In fact, it has more than tripled its Elbit shareholdings [2]. Elbit provides 85% of Israel's military drone fleet and land-based equipment, as well as bombs, missiles and other weaponry [3], which it markets as "battle-tested" [4] after they are developed during bombardments in occupied Palestine. Additionally, Barclays holds over £2billion of investments, and underwrite loans worth £6billion, in other firms involved in arming Israel [5].

When Barclays last saw nationwide resistance, its CEO, CS Venkatakrishnan, claimed that the the bank is "*deeply sympathetic about the overall suffering in the region*", but pleaded that Barclays' property ought to be protected [6]. Palestine Action state in response:

"Barclays' investments are contributing to the wholesale destruction of Gaza, the erasure of Palestinian life and property.

These banks choose to invest in manufacturers of genocide. They have evaluated that the continued returns on investment generated by Elbit Systems and Israel's war machine are worth more than the moral or political cost of dealing in war crimes.

Palestine Action will continue to take action to re-calibrate that cost-benefit analysis: reducing the profitability of any operation doing business with Israel's arms trade."

ENDS

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Palestine Action is a direct-action network of groups and individuals formed with the mandate of taking action against the sites of Elbit Systems and other companies complicit in Israeli apartheid, calling for all such sites to be shut down.

[1] Freedom Press, 11th June 2024, Shut the System and Palestine Action smash 20 Barclays branches

[2] Campaign Against Arms Trade, May 2024, Barclays: Arming Israel's Apartheid and Genocide

[3] Investigate AFSC (American Friends Service Committee): Elbit Systems https://investigate.afsc.org/company/elbit-systems

[4] WhoProfits Research Centre: Elbit Systems https://www.whoprofits.org/companies/company/3794

[5] Campaign Against Arms Trade, May 2024, Barclays: Arming Israel's Apartheid and Genocide

[6] CS Venkatakrishnan, 14th June 2024, 'Attacks on Barclays put our staff at risk and are not justified by Middle East events', *The Guardian*

← Palestine Action Blockade and Spray Lobbyists for Israeli Weapons Firm
Israel's biggest arms firm and government ministers influence prosecution and policing of Palestine Action →

Palestine Action blockade two Israeli weapons sites in Bristol

Nov 12, 2024 | 0 comments

Images and videos are available for free, with the relevant credit

Today the direct action network Palestine action redoubled their efforts to shut down Elbit Systems, Israel's largest weapons company, by blockading the entrances of two sites in Bristol. The activists used lock on devices inside vans to block the gates at both sites, preventing any from entering and damaging Elbit's ability to develop death dealing weapons.

One of the sites, the facility at Filton, Bristol, is the most recent of Elbit facilities in England, the brand new £35m R&D hub of Israel's biggest weapons firm. Its June 2023 opening was attended by the UK-Israeli Ambassador Tzipi Hotevely, and Elbit's CEO Bezhalel Machlis – who has frequently boasted of the company's central role in Israel's military during the ongoing Gaza genocide.

According to Israeli media, Elbit provides up to 80% of the Israeli military's land based military equipment and 85% of its military drones. It supplies vast numbers of munitions and missiles – including the 'Iron Sting' recently developed and deployed for the first time in the 2023-2024 Genocide in Gaza, along with wide categories of surveillance technologies, targeting systems, and innumerate other armaments.

"Direct action against Elbit aims to disrupt this: targeting the source of colonial violence and genocide against the Palestinian people, undermining Elbit's profiteering from Israel's daily massacres." said a Palestine Action spokesperson.

The other site is Elbit's headquarters at Aztec West 600. This HQ is used by used by Elbit to oversee their logistical, financial, and operational affairs throughout the country, making it a key hub for Israel's arms trade in Britain. This is the latest in a seriesofactions undertaken at the site since the start of Palestine Action's campaign.

A Palestine Action spokesperson said: "Sustained direct action against Elbit disrupts the colonial violence and genocide against the Palestinian people. When our government fails to abide by their legal and moral responsibility to prevent genocide, it is the responsibility of ordinary people to take direct action to do so. We will continue to take direct action until Elbit is out of Britain."

ENDS

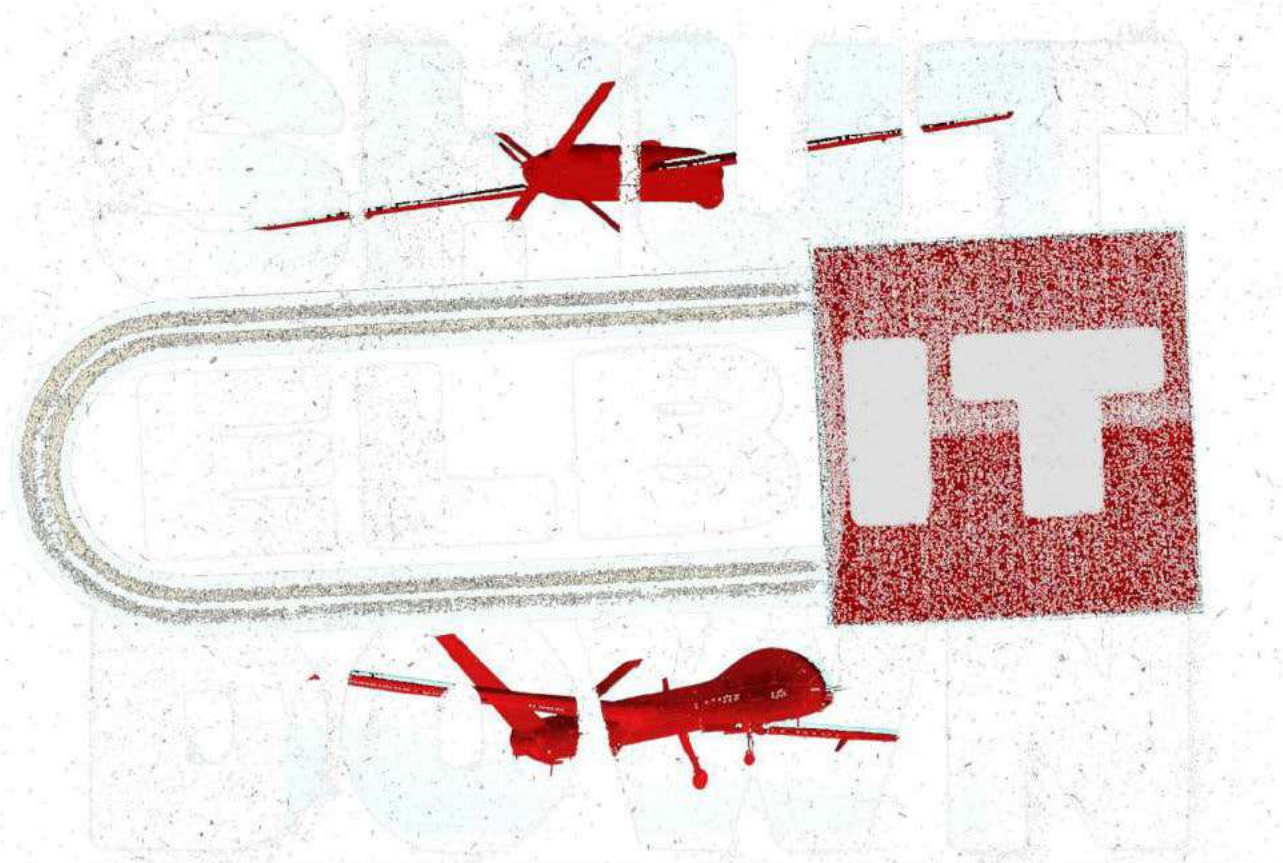
NOTES TO EDITORS

If you would like any further information on Palestine action, please contact media@palestineaction.org

Palestine Action is a direct-action network of groups and individuals formed with the mandate of taking action against the sites of Elbit Systems and other companies complicit in Israeli genocide and apartheid, calling for all such sites to be shut down.

BACK TO MAP
Teledyne
Israeli Arms Company or Principal Supplier of Military hardware to the IOF
Spread the word about complicit companies in your area
SHARE TO FACEBOOK
SHARE TO TWITTER
SHARE TO WHATSAPP
SHARE
All Teledyne sites
Teledyne
Shipley
Teledyne Airedale House, Acorn Park, Shipley BD17 7SW
Teledyne
Lincoln
Teledyne e2v Technologies UK Ltd 168 Sadler Rd, Lincoln LN6 3RS
Teledyne
Birkenhead
Teledyne CML Composites Unit A, 6 Tebay Rd, Bromborough, Birkenhead, Wirral CH62 3PA
Teledyne
Chelmsford
Teledyne E2V 106 Waterhouse Ln, Chelmsford CM1 2QU
Teledyne
Presteigne
Teledyne Labtech Broadaxe Business Park, Presteigne LD8 2UH
Teledyne
Newbury
Teledyne Reynolds Navigation House, Canal View Rd, Newbury RG14 5U
READ THE ACTION GUIDE
Leaflet | © OpenStreetMap contributors © CARTO

PALESTINE ACTION



TAKE DIRECT ACTION AGAINST ISRAEL'S ARMS TRADE IN BRITAIN

JOIN THE RESISTANCE

Sign up to get involved in the campaign to shut down Israel's weapons trade

SIGN UP

FUND THE MOVEMENT

Help us make 2024 the worst year for Elbit yet

DONATE

ATTEND AN ONLINE WORKSHOP

Join one of our online workshops every Wednesday 7PM, Friday 7PM and Sunday 3PM

JOIN AN EVENT

JOIN A DIRECT ACTION TRAINING DAY

Direct Action Training Day [Edinburgh]

Date December 8, 2024

Time All Day Event

Website BOOK HERE

Palestine Action is running training days across the country, to bring together like minded people for a day of talks, trainings and group discussions. All of which is geared towards harnessing the strength of the grassroots and directing it towards bringing down Israel...

Join Palestine Action

JOIN PALESTINE ACTION

First Name

Last Name

Email *

Zip/Postal Code *

PHONE NUMBER *

Not in GB?

ARE YOU INTERESTED IN TAKING DIRECT ACTION AGAINST ISRAEL'S ARMS TRADE? *

- [ ] YES
- [ ] NO

IF YES TO THE ABOVE, HAVE YOU TAKEN PART IN A PALESTINE ACTION DIRECT ACTION WORKSHOP?

- [ ] YES
- [ ] NO

ARE YOU PREPARED TO SUPPORT ACTIONISTS AT COURT AND POLICE STATIONS? *

- [ ] YES
- [ ] NO

If you are not already subscribed, would you like to receive email updates from Palestine Action? *

- ○ Yes, opt in to email updates
- ○ No, do not opt in

Note: If you subscribed earlier, this will not unsubscribe you. You can unsubscribe using the link provided in emails you receive. You can always take action without opting in.

I'M IN

Sponsored by: Palestine Action

Action Network

TAKE ACTION TO DISMANTLE THE WAR MACHINE

JOIN AN ONLINE WORKSHOP

TAKING PLACE EVERY WEDNESDAY 7PM, FRIDAY 7PM AND SUNDAY 3PM (BST)

REGISTER NOW

SUPPORT UPCOMING TRIALS

The #Al-Ahli2 Trial

Date Dec 2 - 13, 2024
Time 9:30 am - 4:30 pm
Venue Leicester Crown Court

The #Deansgate1 Trial

Date Dec 2 - 3, 2024
Time 9:30 am - 4:30 pm

Venue Manchester Magistrates Court

More Info

The #Ferranti2 Trial

Date Dec 4 - 6, 2024
Time 9:30 am - 4:30 pm
Venue Minshull Crown Court

More Info

Load More

Dismantle the war machine | #ShutElbitDown

add_action('wp_footer', function() { ?>

JOIN THE RESISTANCE

Join Palestine Action

JOIN PALESTINE ACTION

First Name

Last Name

Email *

Zip/Postal Code *

PHONE NUMBER *

Not in GB?

ARE YOU INTERESTED IN TAKING DIRECT ACTION AGAINST ISRAEL'S ARMS TRADE? *

- [ ] YES
- [ ] NO

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- [ ] NO

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I'M IN

TALKS & TRAININGS

CRASH COURSE ON DIRECT ACTION [ONLINE WORKSHOP]

Date November 27, 2024
Time 7:00 pm - 9:00 pm
Website BOOK HERE

Join this crash course on direct action to find out how you can be part of this campaign and help us #ShutElbitDown. The workshop will cover our theory on direct action, British complicity and the legal process associated with taking action!

ARRESTEE SUPPORT VOLUNTEER WORKSHOP [ONLINE WORKSHOP]

Date November 28, 2024
Time 7:30 pm - 8:30 pm
Website BOOK HERE

Online workshop for all those interested in joining the welfare and post-arrest support volunteer teams who look after our fellow comrades.

DIRECT ACTION TRAINING DAY [GLASGOW]

Date December 1, 2024
Time 11:00 am - 5:00 pm
Website BOOK HERE

Palestine Action is running training days across the country, to bring together like minded people for a day of talks, trainings and group discussions. All of which is geared towards harnessing the strength of the grassroots and directing it towards bringing down Israel...

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DIRECT ACTION TRAINING DAY [EDINBURGH]

Date December 8, 2024
Time All Day Event
Website BOOK HERE

Palestine Action is running training days across the country, to bring together like minded people for a day of talks, trainings and group discussions. All of which is geared towards harnessing the strength of the grassroots and directing it towards bringing down Israel...

ARRESTEE SUPPORT VOLUNTEER WORKSHOP [ONLINE WORKSHOP]

Date December 10, 2024
Time 7:30 pm - 8:30 pm
Website BOOK HERE

Online workshop for all those interested in joining the welfare and post-arrest support volunteer teams who look after our fellow comrades.

ARRESTEE SUPPORT VOLUNTEER WORKSHOP [ONLINE WORKSHOP]

Date December 19, 2024
Time 7:30 pm - 8:30 pm
Website BOOK HERE

Online workshop for all those interested in joining the welfare and post-arrest support volunteer teams who look after our fellow comrades.

TALKS & TRAININGS

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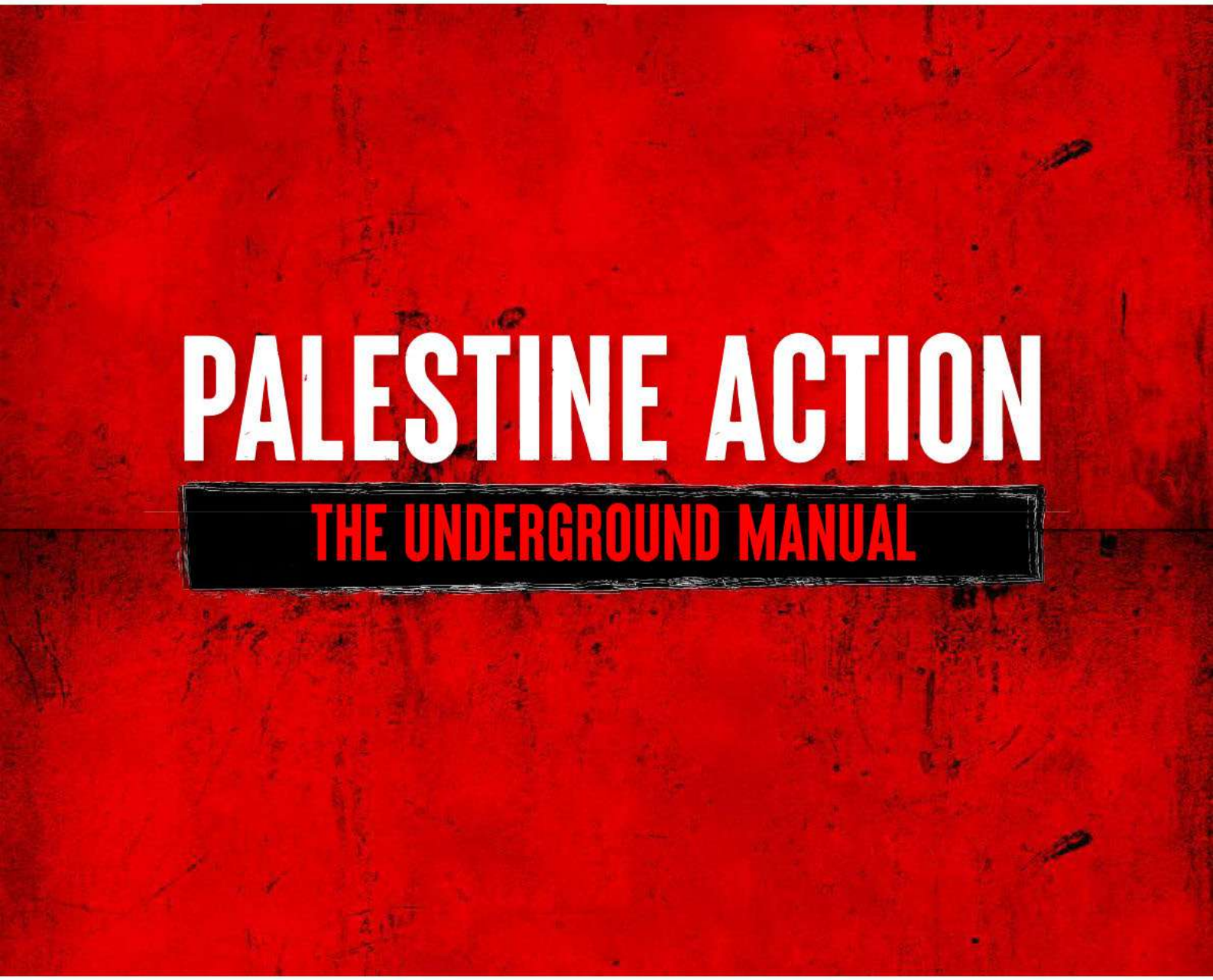

PALESTINE ACTION
THE UNDERGROUND MANUAL

STEP 1

CREATE A CELL

A CELL IS AN AUTONOMOUS GROUP TAKING ACTIONS WITHOUT DETECTION AS PART OF PALESTINE ACTION UNDERGROUND.

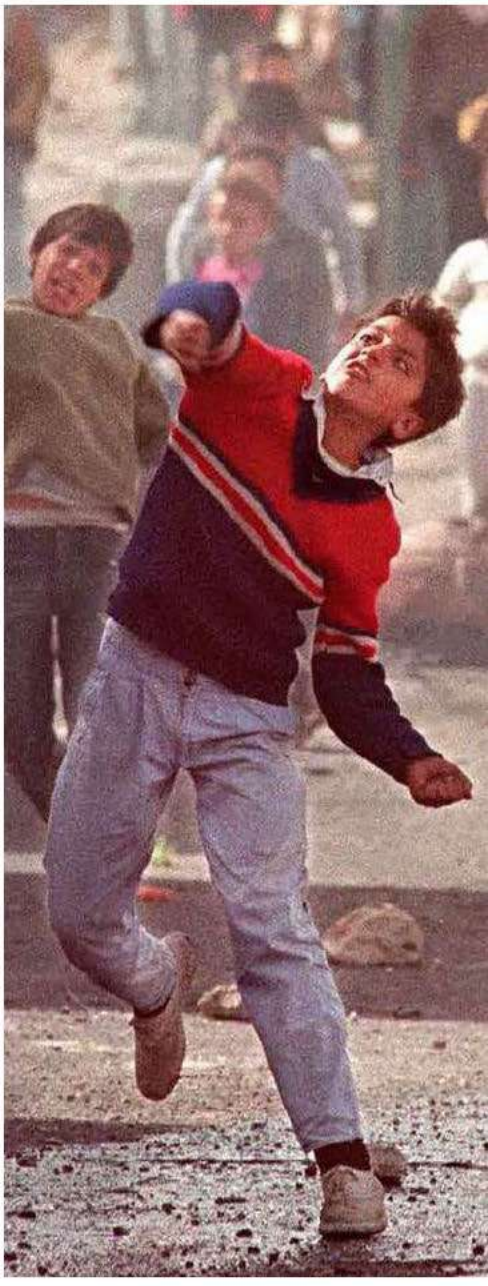
To build your cell, it is crucial that you only invite **TRUSTED** people to take part in it. You don't need loads of people either. Keeping the cell small, makes it more secure. **3-5 PEOPLE** is an ideal number. BUT, just one person taking action on their own is enough!

However, taking action with other trusted people, makes it safer and means you've always got back up with you.

Once you've got your cell together, come up with a name. This can be named after a Palestinian freedom fighter, a play on taking action against the war machine, or anything else that's appropriate.

Next, get a **protonmail address.** This will be key for sending in your actions, which we talk about later on in the guide. Once your cell has done its first action, and sent in the information to actions@palestineaction.org, we will then respond to you with further information, potential future targets and any other tips and tricks that we come across in the Palestine Action Underground.

Please refer to the technology page for more advice on protonmail and proton VPN



STEP 2

PICK A TARGET

BRITAIN

Now you've got your cell (or yourself), it's time to pick your target. Head to our website to find a list of secondary and primary targets who enable and profit from the Israeli weapons industry in Britain. Making your job to pick one a slightly easier process! Each is just as culpable as the other, and applying pressure to them is key to breaking the links which sustain Israel's arms trade.

It might be simpler to pick a target based on your locality, making it easier to plan, conduct the reccies and save some transport costs!

CHECK OUT THE TARGETS

If you are not based in Britain, then it might take a little bit of research to find your relevant target. As Israel's weapons industry isn't content with just the destruction of Palestine, they tend to try and expand their reach to every corner of the globe.

CHECK OUT THE NEXT PAGE TO FIND INTERNATIONAL TARGETS

STEP 2

PICK A TARGET

INTERNATIONAL

A starting point for research is to make sure your using a secure browser when looking into complicity companies. Here are some key search terms to use alongside the country/city you live in:

ELBIT SYSTEMS **RAFAEL** **TELEDYNE**

If that doesn't bring any fruitful results, then you can try searching the company names of all our targets included here and see if they have a presence in your country/area.

"elbit systems" "leicester"

Some countries may have a Ministry of Defence which has made a deal to buy weapons from Elbit Systems or another Israeli weapons firm, without having a factory in the country. Targeting the Ministry of Defence offices, or any other relevant buildings associated with government making decisions, is always a possibility.

It's also definitely worth looking into your country's weapons firms, or as they might call it "security and defence". Many countries have their own public and private weapons firms, who deal with the apartheid state of Israel. For example, Thales is a french weapons firm with many links to Elbit Systems.

CHECK OUT THE TARGETS

STEP 3

PREPARE FOR ACTION

If picking your target didn't get you excited enough about your new venture to dismantle Israel's war machine, preparing for action definitely will.

WHEN PREPARING FOR ACTION, KNOWING YOUR TARGET AND DOING AN EFFECTIVE RECONNAISANCE (RECCE) IS VITAL. RECCES PROVIDE KEY INFORMATION TO MAKE YOUR ACTION AS SMOOTH AND DAMAGING AS POSSIBLE.

Before we get into what infromation you need to gather, let's talk about not being obvious as f*** when you do a recce. Depending on where your target is, changes how you need to act. For example, if it's in the middle of town centre, then going for a walk with a friend or by yourself and pulling out a camera to look at the site doesn't look suspicious at all. However, if you're going out in the sticks walking around an industrial estate with a selfie stick - you'll probably stand out a bit. On going for sites in more rural areas, try asking to borrow someone's dog to take them on a walk (or walk your own dog if you've got one). You can also do a drive by, but make sure you're getting the key information you need from this.

Now, before you go heading into town centre or to walk your dog, it's always worth having a look first on google earth. After searching on google earth using a secure browser (Tor for example), and using the little yellow man to walk down the street, you'll have more of an idea of what you could potentially do on your action, and what else you need to find out from your recce. Having a brief idea of what your action could be, will help you do a recce which takes into account your actual plan. Do not just leave it to google though, as company's make changes all the time, which is not updated on google. Nothing beats going in person for the best possible preparation.

KEY INFORMATION TO FIND OUT

- **PLACES TO PARK**
  Before, after and during
  It's important to find out a car parking space which isn't monitored by CCTV or needs a parking ticket .Of course you might have got your hands on fake plates, but even still it's good to keep the vehicle undetected. Make sure it is also easy to access from where your action will be.
- **SECURITY**
  How many? Are they stationary or moving around?
  If there is security present, think about how you could potentially avoid them. If that's not possible, consider how you could still do your action.
- **INSIDE OR OUTSIDE?**
  Where are they looking out onto? Which street?
  Times of shift change- its often better not to catch them at shift changes as there will be more staff around. Do security remain inside the compound or seek to cover entry points outside the facility?
- **CCTV**
  Location? How many? What is it pointing at/filming?
  It may be impossible to avoid doing your action whilst avoiding CCTV, that's why it is crucial to make sure you are unidentifiable as mentioned before
- **WHAT IS SURROUNDING THE TARGET SITE**
  Do they have neighbours/neighbouring buildings?
  Do the neighbouring buildings have security?
- **ESTIMATED TIME OF ARRIVAL FOR POLICE**
  How far away is the local police stations?
- **POLICE PATROLS**
  Do they patrol area? During specific times?
  Unmarked police cars in the area? Foot patrols?
- **FENCES?**
  How many? Where? What type of fences?
  How high a ladder would be needed to get over fences?
- **BARBED WIRE?**
  How much? Where?
- **ACCESS POINTS** to building (fire escapes etc)
- **ALARMS**
  Do you know what sets off the alarm?
  Whatever sets off the alarm should be done last.

STEP 4

PLAN YOUR ACTION

TYPES OF ACTION

Now you've done your recce, it's time to nail down your plan! Creativity is vital to keep our resistance effective. When planning for your action, an important starting point is to finalise what you want to achieve. Here are just a few examples of what actions have already been taken. If your inexperiecned it's best to start simple and build your way up. Dream up crazy ideas in your cell, remember that your action is to destrupt, damage or destroy your target. Here are some suggestions and different tatics to get you started...

EXTINGUISH YOUR TARGET

Fire extinguishers can be repurposed and refilled with blood-red paint, so when it's sprayed it makes a big splash and can cover a massive area within seconds - perfect for a get away action.

SPRAY PAINT

Spray painting can be quick as well, as long as you don't try and spray an essay onto the walls of your target! Some key slogans you can use are: Shut Elbit Down, Free Palestine, Evict Elbit, War criminals

SMASHING WINDOWS AND EXTERIOR EQUIPMENT

Smashing stuff can also be very quick to do. With an efficient sledgehammer in your hand, you can cause quite a bit of damage! Smashing windows often only takes one or two swings. But air conditioning units, cameras and other external equipment can sabotage the profits of your target even further.

BLOCK THEIR PIPES

If you've managed to locate the company's external pipes (water and/or sewage), then blocking them will create a lot of disruption for your target! Concrete can be used to fill up the pipes, and when it dries, your target will be in for a messy surprise.

BREAK IN

If you're feeling up for it, and know the site back to front, then breaking into your target and damaging the contents inside is obviously a very effective tactic.

THINK BIG

The tactics mentioned are examples of previous actions so by all means think big! Try not limit your action based on whats been done before. Remind yourself when brainstorming different ideas, what could I do to be creative?

PLAN YOUR ACTION

HOW TO GET TO THE SITE AND LEAVE UNDETECTED

Now once you've decided what tactics you're going to use for your action, you'll need to plan how to get to the site and leave undetected. Transportation is a key part of any plan, and can be the difference between getting away with it, and getting caught. Here are some examples of different transport methods, and how you can use them to your advantage:

FOOT

Walking to a site, or even running if you're feeling up for it, is probably one of the most covert ways of taking action. Key to this is keeping your face covered the whole time, and planning a place to go to where there are no cameras, which you can leave with normal clothing on, to head to your next destination. Remember to make sure it's a busy area, so if you are later captured on CCTV, they won't be able to tell it's the same person who did the next action. .

BIKE

For covert actions, bikes are great. A similar principle applies though as using a car. Have the bike stored somewhere close to your target, but in a place without cameras. Then go on foot from that point to do the action, then head back to your bike.

CAR

Cars tend be the easiest way to get around. But, they do have license plates which can be picked up by cameras and traced to the owner. If you do plan on using a car, make sure you've sussed out where all the CCTV and road cameras are for the route you want to take - and find a route which avoids them completely. Do not park the car next to the site, have it at a location which isn't able to be picked up by cameras.

ROUTE

When you decide your mode of transport, you need to make sure you have your routes planned for a perfect getaway. Think about where the cameras are, and don't walk a few hundred metres down the road and take your mask off. If the police want to trace you, they'll follow the cameras to where you took your mask off and possibly get a picture of your face. Wearing a baseball cap does still help with avoiding your face being captured on camera as well, but it's no guarantee. The best thing to do is remain covered until you are at a safe spot without cameras, and that is relatively busy. From there you can plan your route home.

PUBLIC TRANSPORT

If you're using public transport, do not, we repeat DO NOT, use your own debit/credit card. This information is stored and can be accessed by the police very easily. It is always best to use cash. However, these days, many transport modes don't allow cash. If you're in London using an oyster card which is topped up with cash is the best way to go. Also be aware than public transport has CCTV, so keeping your face covered is ideal. Getting on the bus or train with a balaclava on might draw more suspicion though. So think of other ways to cover your face - half face coverings are very common since covid and you can wear sunglasses at night.

PLAN YOUR ACTION

CRUCIAL ELEMENTS

ROLES

If there is more than one of you in the action, which is ideal, you should split up roles between you. For example, if you want one person to just focus on getting pictures and a video, then they should focus on that and not on swinging hammers! The others could split up their roles from taking on hitting different parts of the site, or one can focus on paint and the other on smashing. Whatever your action is, make sure you've thought through who is doing what to make the action as efficient and quick as possible.

Make the action as quick as possible, whilst making your action effective! This is one of the key reasons its so crucial to plan your action well, so everyone knows what they're doing.

EQUIPMENT

Now you've got your plan down to a T, it's time to get equipped. On this point, it's a good idea to remember that **CASH IS KING.** When buying equipment, whether it's spray paints or sledgehammers, don't leave a paper (or digital) trail. Use cash and wear a baseball cap in the store and/or a face covering, just for extra measure. Obviously, you're going need the tools to conduct your action. These may include spray paints, making a fire extinguisher (check out our guide) and sledgehammers. It's important to remember when using sledgehammers, to get some cut safety gloves **(YOU DON'T WANT TO GET CUT AND YOU DON'T WANT TO LEAVE YOUR BLOOD ON THE SITE EITHER!).**

Now, those items are crucial for the action.
But here's how to remain undetected.

MAKE SURE:

A FACE COVERING IS KEY

Do not have your face on show at any point during the action. Balaclava is best for this. This might seem predantic, but cops are obsessed with trainers. Don't wear shoes that you've worn when arrested on an action or at a protest, or that are all over your social media. Best thing is to get the most plain boring black shoes and to only wear them when taking action.

YOUR CLOTHING IS DARK

(BLACK IS BEST)

YOUR TRAINERS ARE VERY PLAIN

(BLACK IDEALLY)

YOUR CLOTHING IS BAGGY!

(THIS MAKES IT HARDER TO SUSS OUT YOUR BODY TYPE)

YOUR WHOLE BODY IS COVERED

This is especially important if you have any 'identifying features such as tattoos or birthmarks on show. Therefore make sure you have gloves as mentioned above and everything is covered up.

WHEN TAKING ACTION, NEVER LEAVE ANYTHING BEHIND. ABSOLUTELY NOTHING APART FROM PAINT AND DESTRUCTION. THE POLICE MAY TRY TO FORENSICALLY ANALYSE ANY ITEMS WHICH ARE LEFT, SO DON'T LEAVE ANYTHING.

PLAN YOUR ACTION

DOCUMENTING YOUR ACTION

RECORD

Now you've got your underground fashion sorted. Let's move on to how you're going to capture your action. The most crucial aspect of taking action is to tarnish your target and apply pressure. However, do not underestimate the power of capturing your action on camera so it can reach beyond the target. This means every other target can see what's happened, and more imporantly the people of Palestine know we're active in our solidarity.

DO NOT

ever take your own personal phone on an action. But, if you're thinking about how to capture your action by video/ pictures, then it's **worth getting a burner smart phone**. You don't need to spend £100s on this. You can get some really cheap ones from second hand shops. Lycamobile sim cards tend to be best, as you can buy a top up from any shop (using cash), and then add credit to it without needing to register. **Remember** when using a lycamobile sim card, after you've added a top up, to add a plan to it immediately. You can search online how to do this. But this saves you a lot of money!

ONCE YOU'VE GOT YOUR BURNER SMART PHONE,

It's wise to have a dropbox account set up on the phone. You can set once up using a protonmail email address, which you can easily create for free on **Proton**

Make sure someone else who is in your cell but not on the action has access to this account, just incase. Also remember to check the dropbox account is working! Capturing your action on camera does not mean compromising yourself. If a video is taken, you can edit out any part which reveals identities. If you do not managed to do this successfully, Palestine Action will make sure to check videos for anything that can be used against you and remove it before posting it.

You can send in videos/images of your action to:

ACTIONS@PALESTINEACTION.ORG

For extra security measure, you can also remove the "exif data" from your pictures before sending them in. This is basically all the data that is stored in pictures which can have some identifiable information. It's really easy to remove this. **You can use the website** **https://www.verexif.com/en/**

If you forget to do this, Palestine Action will remove the exif data before posting.
See our technology page for more information

PLAN YOUR ACTION

SAFE MEETING PLACE AFTER ACTION

WHAT IF IT ALL GOES PEAR SHAPED?

Prepare a "safe" meeting place if you all have to split up and scarper! This should be far enough away from the site to be safe, but not too far away that it would take too long. You should agree a length of time you would wait there until those who've arrived at the meeting place leave.

LEGAL

Now even though you're planning to get away, you must be prepared and take into account the risk of getting caught. You can do everything possible to minimise this, but this is a very real possibility. Make sure that your cell is aware of the potential legal consequences. This will obviously be dependent on the action you take and that's why it's important you do your own research on this.

We recommend using Kelly's solicitors if you do end up hed.

- **Kelly Brighton**
- **Hodge Jone**
- **Allen London**

They'll ask for your authority to liase with Palestine Action's support team. If you do allow this, it means we can arrange police station support and keep you in touch with our dedicated support team throughout your legal process.

STEP 5

TAKE ACTION

Adrenaline and nerves will be pumping through you at the same time. This is normal. Make sure you run through your plans right before taking action another time, to make sure everyone is on the same page. Then go for it.

THE DAY HAS COME, YOUR ACTION IS PLANNED, YOU'RE ALL EQUIPPED AND READY TO GO.

GOOD LUCK!

STEP 6

POST-ACTION

You've just sabotaged a complicit company. At this point, you want to make sure to

DESTROY ALL EVIDENCE.

If you've got empty spray cans or any other items left, get them out as soon as possible. Don't put them in your recycling bins, find a communal or other place to throw them away. If you don't want to get rid of your underground attire, make sure they're not in your place or your car. Take them to a friend's place. This might seem over the top but the best peace of mind and finale to an action is knowing there is no evidence left behind at the site, or in your home. If the police ever get as far as searching your home (which is very unlikely if you follow all the above steps), they'll search for any items which connect you to that action.

REMEMBER TO:

- Get the pictures off the burner smart phone
- Remove the exif data from any pictures **verexif**
- Edit out any identifiable points in video footage (voices or faces)
- Send them into actions@palestineaction.org

Along with the footage, you can add your own communique, which Palestine Action will publish alongside your action.

STEP 7

TECHNOLOGY

CHECKLIST

KEY INFORMATION TO FIND OUT

- ☐ **WHERE POSSIBLE, DON'T USE PHONES OR COMPUTERS**
- ☐ **ARRANGING MEETINGS**
  Use Signal with disappearing messages on.
  Put phones in a Faraday cage or microwave in another room.
- ☐ **USE TOR FOR ONLINE RESEARCH**
- ☐ **STAY CLEAN**
  Delete everything you don't need like photos and research files.
- ☐ **USE A BURNER SMART PHONE FOR MEDIA**
- ☐ **USE A VPN**
  Although this is not necessary when you are using Tor, a VPN will obscure where you are connecting from so you are less identifiable by the websites you are using.
  Good VPNs to use are:
  - ***ProtonVPN (free)***
  - ***MullvadVPN (paid, can pay cash)***

HOW TO SET UP SIGNAL WITH A BURNER NUMBER:

1. **INSTALL SIGNAL ON YOUR REGULAR PHONE**
2. **BUY OR USE ANOTHER PHONE (E.G. A CHEAP BRICK PHONE) WITH A SIM ALL BOUGHT IN CASH**
3. **WHEN REGISTERING FOR SIGNAL, SET UP AN ACCOUNT USING THE NUMBER ON THE BURNER PHONE**
4. **TAKE THE ACTIVATION CODE FROM THE BURNER PHONE AND ENTER IT IN THE FIRST ONE**
5. **YOU CAN NOW TURN OFF AND NOT USE THE BURNER PHONE**
6. **USE SESSION FOR MESSAGING IF YOU WOULD NOT LIKE A PHONE NUMBER ASSOCIATED**
7. **USE PROTONMAIL AND CREATE A COMPLEX PASSWORD: WWW.XKPASSWD.NET/S/**

STEP 7

SECURITY

SECURITY GUIDE

We could write a whole book on this subject. But hey, firstly it would be out of date by the time we wrote it with the rapid change of specially digital security , and second plenty of other clever folks have so we provide some trusted sources here for you to check and re check. One thing about your underground cell is you don't need to worry or engage in recruitment once it's formed and therefore it is somewhat easier to put in place higher level security procedures that you need. Digital security is vital but it should not be at the detriment of basic security! Bragging, gossiping and loose words generally are often how things become undone and that sort of behaviour should be avoided and called out if you some across it in your cell. In addition to the advice contained in the guides below you should also adopt some simple and sensible precautions of your own. The most well known, as oftentimes forgotten is you should not have your phone with you in any meeting your cell has. Ideally you would arrange meetings via signal messenger (be sure to enable disappearing messages) and then not take your phone. Also all members of your cell should invest in a faraday cage for your phone (you can pick them up for £20-£30). These block all communications to your phone and in effect if used properly you "go dark" for the duration the phone is in the faraday cage (its called a cage but most look like oversized wallets!)

WHAT IS A VPN?

"A VPN, or virtual private network, is a technology that establishes a secure tunnel between two or more devices.An Internet VPN, such as **Mullvad** , offers a tunnel between you and the Internet, allowing you to browse the web securely and privately, even when using a public WiFi network at a cafe or hotel."

CRYPTPAD

Use CryptPad to store any collaborative research documents, if you have too. On cryptpad, add passwords to your files and set expiry (destruction) dates for after your action if you don't need it beyond then.

PROTONMAIL

Protonmail is an end to end encrypted email. This means that only you and the people who you email **(e.g. action@palestineaction.org)** are the ones that can see your email content.

However, if the Swiss courts request data from protonmail (which can be done via Europol) protonmail may provide them with IP address information (basically, where you logged in from). **If you use a VPN every time you log into the address, then this means protonmail never gets access to an IP address that is linked to you and you are much safer.** Although services like riseup.net are run by people more politically aligned, that doesn't necessarily mean they are better. Organisations like RiseUp and smaller and less well resourced than protonmail.

Just use protonmail and be careful.

"We know by the nature of technology and digital security this information will go out of date quickly. We welcome constructive suggestions about changes to this part of the guide just email info@palestineaction.org (or whatever)"

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PALESTINE SOLIDARITY CAMPAIGN LTD

Company number **05213508**

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Overview | Filing history | People | More

Registered office address
27 Old Gloucester Street, London, England, WC1N 3AX

Company status
Active

Company type
Private company limited by guarantee without share capital

Incorporated on
24 August 2004

Accounts

Next accounts made up to **31 August 2024**
due by **31 May 2025**

Last accounts made up to **31 August 2023**

Confirmation statement

Next statement date **24 August 2025**
due by **7 September 2025**

Last statement dated **24 August 2024**

Nature of business (SIC)

- 94990 - Activities of other membership organisations not elsewhere classified

Tell us what you think of this service (https://www.smartsurvey.co.uk/s/getcompanyinformation/) Is there anything wrong with this page? (/help/feedback?sourceurl=https://find-and-update.company-information.service.gov.uk/company/05213508)

Teledyne UK - attacks and demonstrations 2022 - 2024								
Date	Location	Duration	Group	Approx numbers	Police attendance	Tactics seen	Remarks	Subsequent Action
09-Dec-22	**Labtech Prestigne**	**5-6 hours**	**Palestine Action**	**4**	**Yes. Large police response.**	**Accessed recption. Sledgehammers used to break glass and destroy IT equipemnt. Ladders used to scale roof. Damage to roof and production area.**	**Police at heights team and Fire Service removed and arrested protesters from roof.**	**4 protestors held in prison on remand pending trial. Trial held 9-12 May 2023. [redacted] changed plea to guilty. Sentenced to 23 months imprisonment. [redacted] found guilty. Sentenced to 27 months imprisonment.**
28-Sep-23	**Te2v Chelmsford**	**Minutes**	**Palestine Action**	**1**	**No.**	**Red paint splashed across front wall.**	**Photographer present.**	**Police did not respond - led to subsequent calls with an Essex Detective Chief Inspector. Photo of TDY employee on national press website: taken down on request.**
23-Nov-23	TDS Shipley	1-2hrs	Bradford Friends of Palestine	10	Yes immediate 4 Officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
07-Dec-23	TDS Shipley	1-2hrs	Bradford Friends of Palestine	30	Yes immediate +6 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
19-Dec-23	TDS Shipley	1-2hrs	Bradford Friends of Palestine	120	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
26-Dec-23	**TDS Shipley**	**Minutes**	**Unknown**	**2**	**Yes immediate approx 10 officers**		**Arson attack. No injuries. Minor damage to goods inward area.**	**Suspect arrested September 2024. Thought to be a local, not part of a group. The CPS decided not to charge: evidence not strong enough.**
04-Jan-24	TDS Shipley	1-2hrs	Bradford Friends of Palestine	120	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
18-Jan-24	TDS Shipley	1-2 hrs	Bradford Friends of Palestine	45	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
25-Jan-24	TDS Shipley	1-2hrs	Bradford Friends of Palestine	40	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
08-Feb-24	TDS Shipley	1-2hrs	Bradford Friends of Palestine	15	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
14-Feb-24	TDS Shipley	1-2hrs	Bradford Friends of Palestine	60	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
16-Feb-24	CML Bromborough	1-2 hrs	Palestine Action Liverpool	10	Yes - 1 vehicle 2 Officers	Blocking entrances but allowing employee access trying to hand out leaflets	Not believed to be linked to Palestine Action Group. peaceful banners and posters and handing out leaflets	
29-Feb-24	TDS Shipley	1-2hrs	Bradford Friends of Palestine	20	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
06-Mar-24	CML Bromborough	1-2hrs	Palestine Action Liverpool	20	Yes immediate 1 vehicle 6 Officers	Blocking entrances trying to hand out leaflets. Possible that as all police/security resource arrives they disperse, thus costing Police and site extra cost.	Peaceful, blocking entrance gates, displaying banners handing out leaflets	

Teledyne UK - attacks and demonstrations 2022 - 2024								
Date	**Location**	**Duration**	**Group**	**Approx numbers**	**Police attendance**	**Tactics seen**	**Remarks**	**Subsequent Action**
06-Mar-24	Labtech Prestigne	1-2 hrs	Radnor Palestine Links	25	No.	Blocking vehicle gate and handing in a letter	Peaceful. Handing over a letter demanding to speak to management. Subsequent piece in press. Two individuals with known links to PAG and previous protests/damage etc	
15-Mar-24	CML Bromborough	1-2hrs	Palestine Action Liverpool	20	Yes immediate approx 8 officers	Blocking entrances, handing out leaflets	Peaceful, blocking entrance gates, displaying banners handing out leaflets	
18-Mar-24	CML Bromborough	1.5 hrs	Palestine Action Liverpool	20	1 police officer	Blocking entrances but allowing employee entry	As previous. Banners leaflets standing at entrance points	
20-Mar-24	TDS Shipley		Bradford Friends of Palestine	60	5 Police, 2 vehicles in attendance prior to protest	Stood in front of vehicle gates but allowed access	Peaceful displaying banners (pro Palestine/snti Teledyne) 1 protester taking a lot of footage of the site buildings and perimeter. Assessed to be hostile recon. Speaker units and microphone in use (unknown what was said) 2 protesters praying at gate during protests (not seen before). Unite union flags in attendance.	
23-Mar-24	CML Bromborough	45mins	Palestine Action Liverpool	60	1 police vehicle 2 officers	Blocking entrances but allowing employee entry	As previous. Banners leaflets standing at entrance points. No employees required access/exit	
27-Mar-24	Labtech Prestigne	2hrs	Radnor Palestine Links	18	No police	Stood in front of vehicle gates, handed letter to site	Banners, leaflets etc	
02-Apr-24	**TDS Shipley**	**Approx 16hrs**	**Palestine Action Liverpool**	**4 on roof + 20 outside**	**All emergency services in numbers**	**On roof, smashing roof tiles, brickwork, windows etc**	**Eventually arrested and removed. Significant damage to building. Costs estimated at c£700k**	**Daniel Jones & Najam Shah released from custody after 1 week. Ruby Hamill released from custody 2 May. Julian (aka Laila) Gao remained in custody until June. Trial 5-13 Sept 2024. Hung jury. Retrial set for 9 February 2026.**
04-Apr-24	Labtech Prestigne	10 mins	Local councillor and ex mayor	1	No police	Handed letter to site	Nothing further	
09-Apr-24	TDS Shipley	2hrs	Bradford friends of Palestine	20-25	6 Officers	Blocking entrances but allowing ingress egress	Banners, leaflets and speakers	
10-Apr-24	CML Bromborough	1hr	Palestine Action Liverpool	approx 8	No police	Stood in front of entrances but allowed access	Banners, leaflets, chanting	
17-Apr-24	CML Bromborough	1hr	Palestine Action Liverpool	10	No Police	Stood in front of gates allowing acess	Banners, leaflets, chanting	
21-Apr-24	E2V Tech Lincoln	30mins	Unknown	3	No police	Damage caused to perimeter fence/gate	No entry onto site, damage repaired following day	
23-Apr-24	E2V Tech Lincoln	10mins	Unknown	1	No Police	1 individual seen early hours inspecting repaired fence and gate	Police informed, images captured	
24-Apr-24	TDS Shipley	2hrs	Bradford Friends of Palestine	30	8 officers	Slow march on approach road, standing in front of gates	Banners, chanting, hands covered in red paint	
11-May-24	**Cumbernauld**	**15mins**	**Unknown**	**4**	**No response requested**	**4 individuals smashing windows and spraying paint. Did not enter building**	**Red paint, sledgehammers. Not assessed to be PA**	

Teledyne UK - attacks and demonstrations 2022 - 2024								
Date	**Location**	**Duration**	**Group**	**Approx numbers**	**Police attendance**	**Tactics seen**	**Remarks**	**Subsequent Action**
12-May-24	Cumbernauld	20 mins	Unknown	1	Reported to Police	1 person taking photos of damaged windows	Reported to Police, they are investigating. Teledyne security investigation found that the individual was an employee but had failed to notify the control room oftheir visit out of hours. Employee educated and Police informed	
13-May-24	Cumbernauld	5-10 mins	Unknown	2	Reported to Police and response initiated	2 individuals walking along two aspects of the building	Police responded. No feedback from them due to investigation.	
15-May-24	**TDS Shipley**	**7 hrs**	**Palestine Action group**	**4 (3 female, 1 Male)**	**Large emergency services response**	**4 indiviuals gained access to reception roof and smashed roof and windows. Access to site was via a ladder against the fence. CCTV alarms activated and response called.**	**Police at heights team and fire service removed and arrested protesters from roof. Supporting demonstrators were held by Police at entrance to the industrial estate to prevent support to to roof top protesters**	**Ricky Southall, Amareen Afzal, Serena Fenton released on police bail [redacted] in custody (has also attacked Barlcays bank)**
07-Jun-24	CML Bromborough	10mins	Unknown	1 male	Nil	1 individual cut through fence and walked through site	Police informed, images captured	
21-Jun-24	CML Brombourough	1.5hrs	Palestine Action Liverpool	15	Large police presence	Stood in front of gates allowing acess	Banners, leaflets, chanting	
21-Jun-24	CML Bromborough	10 mins	Unknown	1 male	Nil	Appears to have cut through fence and walked off site	Police informed, images captured	
05-Jul-24	**CML Bromborough**	**4 hrs**	**Palestine Action Liverpool**	**3 females**	**Large Police presence**	**3 individuals attempted to scale ladder to roof. After failing this, they rammed the vehicle gates with a van and proceeded to spray paint over the building whilst live streaming**	**Police arrested 3 protestors. All 3 released on bail. We await court dates**	
07-Aug-14	TDS Shipley	2 hrs	Bradford Friends of Palestine	Approx 20	Large Police presence	Standing in front of gates, chanting and singing	Banners, speakers etc	
18-Sep-24	**TDS Shipley**	**2 hrs**	**Bradford Friends of Palestine**	**Approx 30**	**Large Police presnce**	**Standing in front of gates, chanting and singing**	**Banners, speakers etc. One individual carried a mask of [redacted]**	**Mask-wearer arrested, charged with a public order offence and bailed. Plea hearing 18 October 2024.**
02-Oct-24	**CML Bromborough**	**5hrs**	**Palestine Action Liverpool**	**2 males 2 females (1 male, driving the van, left immediately on electric scooter).**	**Large Police response**	**Climbed onto roof via ladder sealed in van, smashed roof and damaged production floor and clean room**	**Police arrested 3 individuals. We await court dates.**	**3 protestors released on police bail.**
30-Oct-24	TDS Shipley	5 hrs approx	Bradford Friends of Palestine	Approx 35	Immediate Police response	Standing in front of gates, chanting and singing	Originally planned for 12pm arrived at 0630hrs, banners, speakers etc	
20-Nov-24	**TDS Shipley**	**2hrs**	**Bradford Friends of Palestine**	**Approx 12**	**Police on scene**	**Standing in front of gates, chanting, singing and dancing**	**Police on scene peventing photography**	
28-Nov-24	TDS Shipley	3 hrs	Bradford Friends of Palestine	Approx 20	Police on scene prior	Initially in front of gates, Police eventually moved them across the road to allow employee access	Police on scene throughout, prevented photography	
08-Dec-24	**e2v Chelmsford**	**N/A**	**Chelmsford Palestine Solidarty Campaign**	**N/K**	**Nil**	**Social media posted for a protest outside 1130-1330hrs 8 Dec 24. A further post was made postponing the event until 22 Dec 24**	No protest took place, due to adverse weather	

Presteigne

09/12/2022

Palestine labtech

Top Latest People Photos Videos

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Search instead for "**Palestine labtech**"

Palestine Action @Pal_action · 1h

BREAK IN: **Palestine** Action smash their way inside Teledyne **Labtech** in Wales, manufacturers of military radars for Israel's high-precision targeting of Palestinians. No company arming apartheid escapes our radar #StopArmingIsrael

2 81 149

TELEDYNE LABTECH
A Teledyne Technologies Company

148

PALESTIN

Chelmsford

28/09/2023

TELEDYNE e2v
Everywhereyoulook
Reception
Visitor Parking
Deliveries
Employee Parking

Palestine Action Spray Red Paint Over Bomb Factory Teledyne e2v on Student Open Day

Sep 29, 2023 | 0 comments

Images and videos from the action are free to use and reproduce: *https://bit.ly/TeledyneOpenDay*

Teledyne e2V in Chelmsford Essex, a part of the Teledyne Technologies Group — the largest supplier of weapons from Britain to the Israeli regime [1], opened its doors to students on 28th September 2023 as a recruitment drive to coincide with National Manufacturing Day [2]. Palestine Action joined the 'open day' event disguised, to make prospective students thinking of working there, fully aware of the company's murderous operations.

Spraying red paint from fire extinguishers over the entrance, students applying to join Teledyne's workforce, or considering the "opportunities" being advertised inside, would have been quickly made aware that a job in this industry leaves you with 'blood on your hands'.

The action was an embarrassment for the firm, who despite their efforts, had no students turn up to their open day and failed to hide their business of war using glossy presentations, attractive pension plans and life insurance schemes, in an attempt to attract new young employees without explaining the whole story. Their 'e2v' factory specialises in detonators used in a wide range of weapons including missiles, bombs and sea mines [3] [4].

Last December, four Welsh activists took direct action at the Teledyne Labtech factory in the small rural border town of Presteigne, rendering the factory inoperable and causing substantial damage — the action to close the factory, which was a success, incurred lengthy custodial sentences. The police alleged hundreds of thousands of pounds of damage was caused, despite that cost being incomparable to the Palestinian lives destroyed by Teledyne's weaponry [5]

Today's action serves to remind war mongers hiding behind state of the art premises, that wherever you are and no matter how hard you try to shield the truth from the public, Palestine Action won't allow your 'business of bloodshed' to operate without consequences. There are no benefits to working in the war industry — there are only lives torn apart.

ENDS

Images and videos from the action are free to use and reproduce: *https://bit.ly/TeledyneOpenDay*

Palestine Action is a network of groups and individuals established to take direct action against properties owned by Israel's biggest arms firm Elbit Systems. The mission is to shut Elbit down and end all British complicity in the illegal colonisation of Palestine.

Website: https://palestineaction.org/

Twitter: https://twitter.com/Pal_action

Instagram: https://www.instagram.com/pal_action/

Youtube: https://www.youtube.com/@pal_action

NOTES TO EDITORS

[1] https://caat.org.uk/data/exports-uk/licence-list?region=Israel&company=Teledyne+Technologies

[2] https://www.essexopportunities.co.uk/events/teledyne-chelmsford-recruitment-open-day/

[3] https://www.teledyne-e2v.com/en/markets/defence/

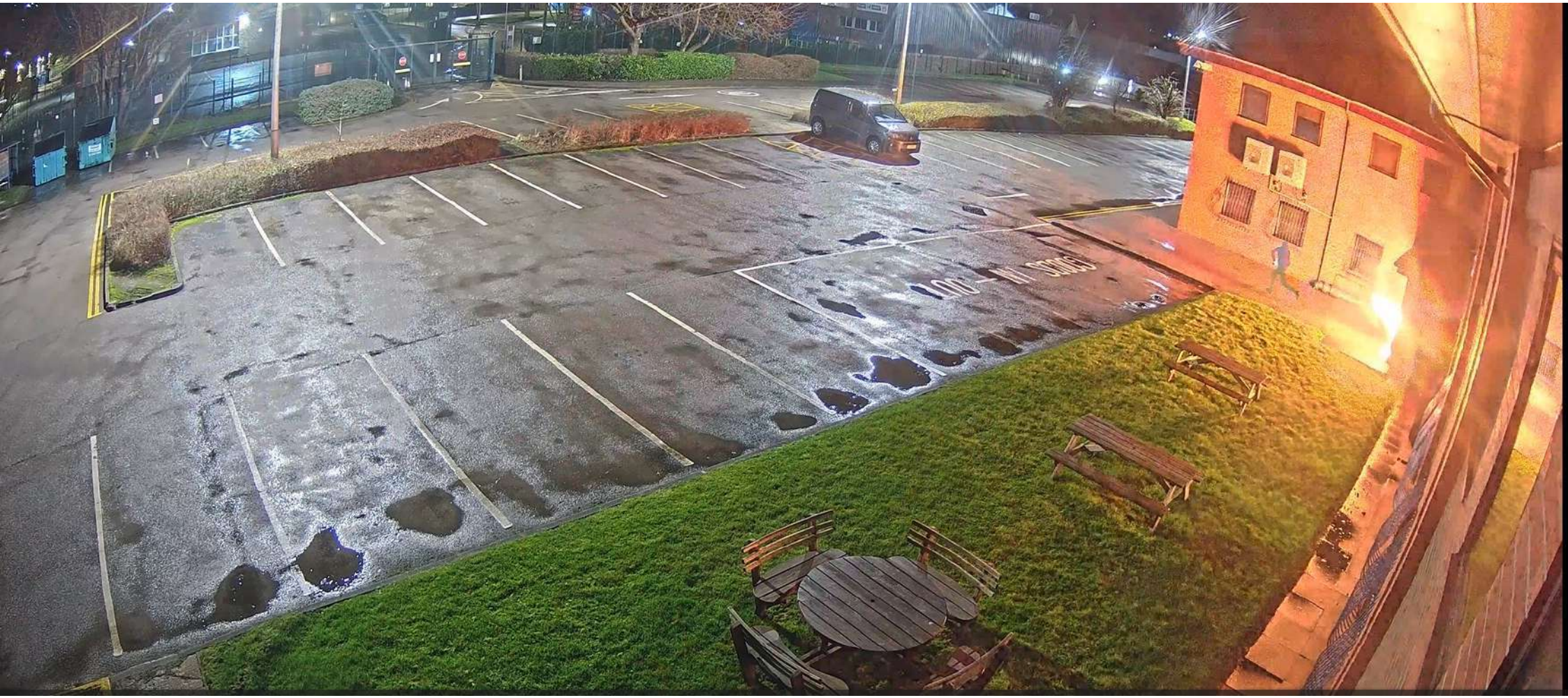
[4] https://ueaeprints.uea.ac.uk/id/eprint/83371/1/Accepted_manuscript.pdf

[5] https://www.palestineaction.org/teledyne-on-trial/

← Palestine Action Crash Europe's Largest Business Event on Drones

Shipley

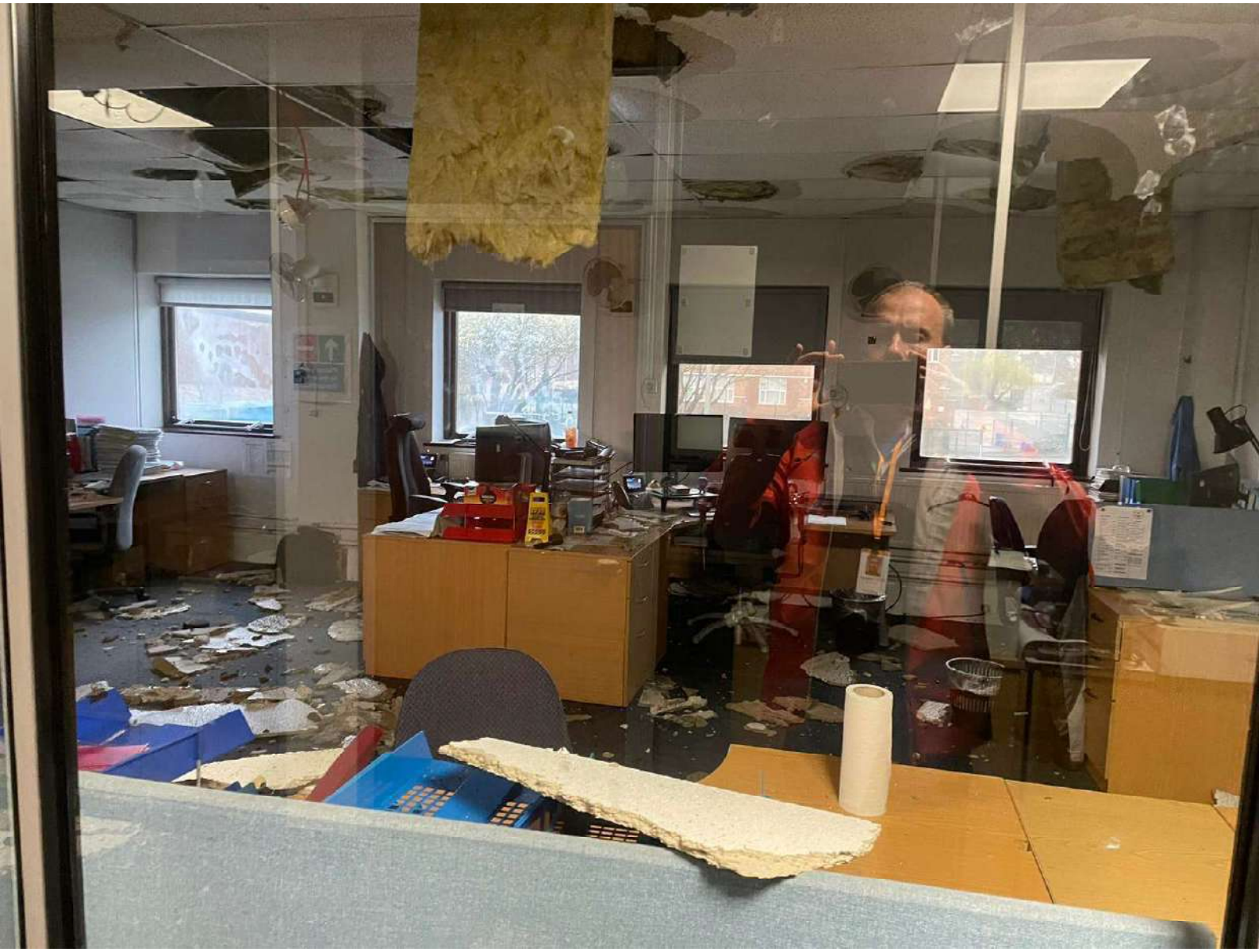
26/12/2023

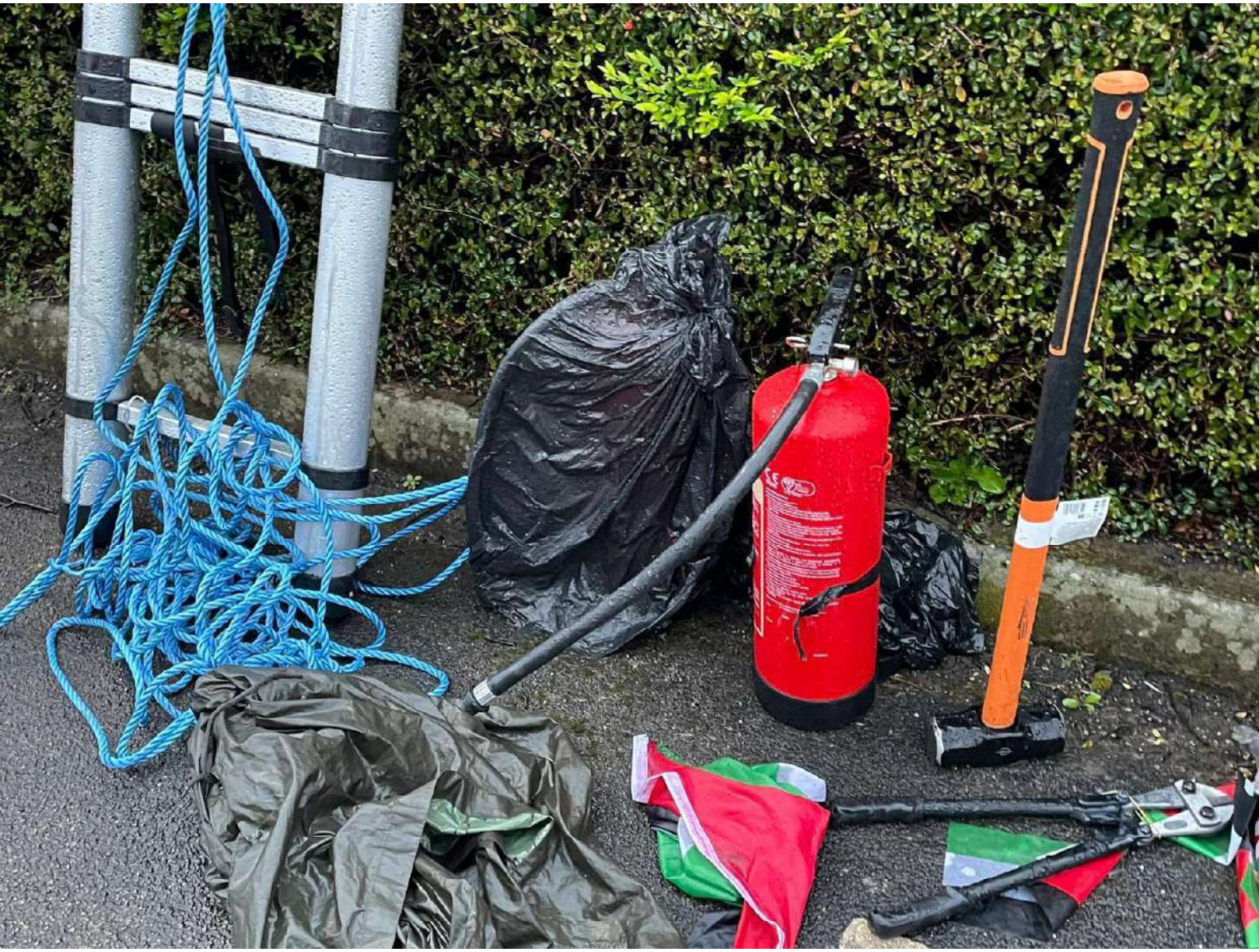


COLLECTIONS
Mon – Fri 08:30 - 16:00
Can All TDS Colleagues
Please Use The Main Entrance
GOODS IN
COLLECTION
ONLY
TELEDYNE

Shipley

02/04/2024





Shipley

15/05/2023

TELEDYNE COMMITS
GENOCIDE

TELEDYNE
STOP KILLING
PALESTINE

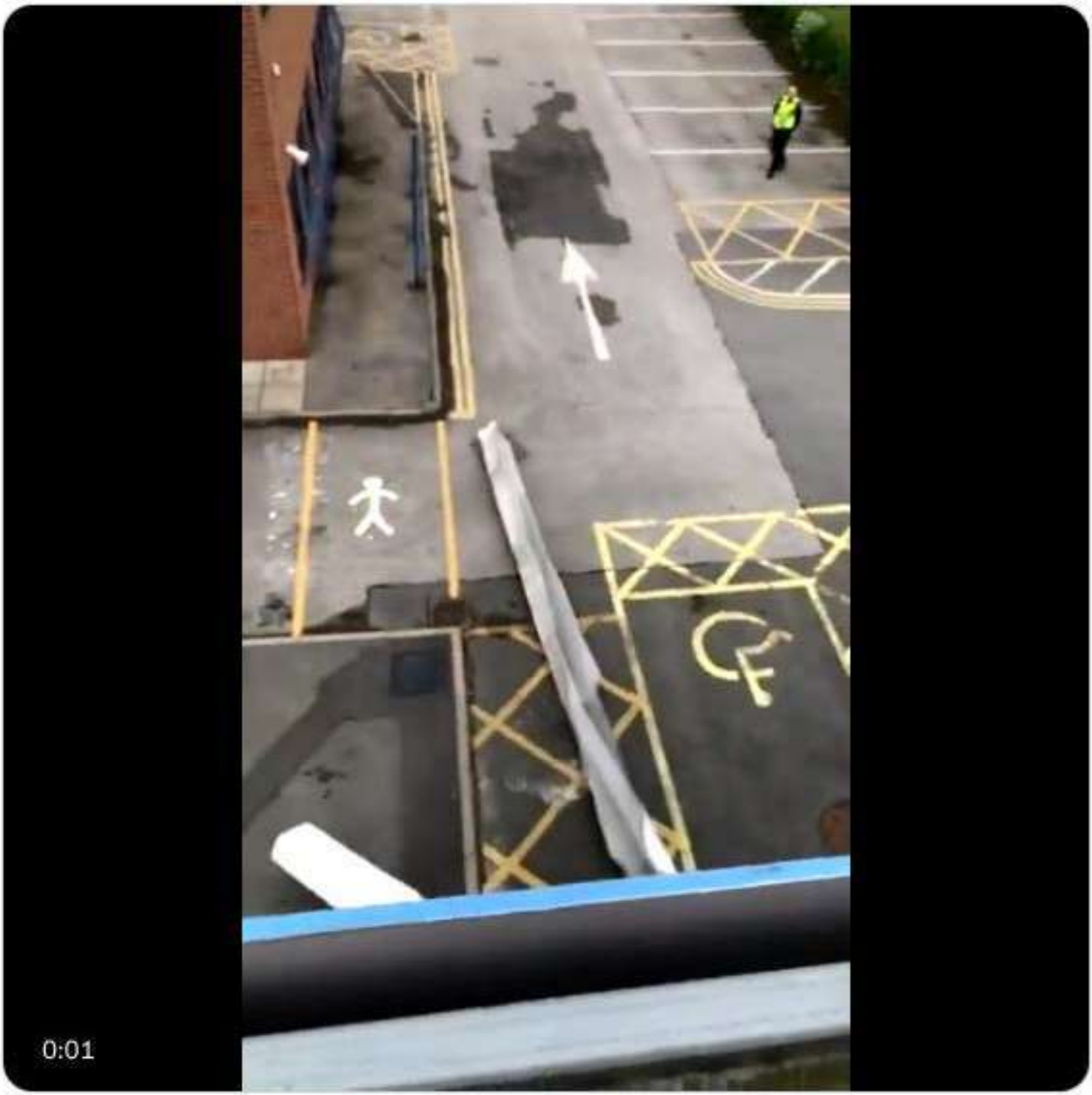
TELEDYNE
STOP KILLING
PALESTINE
TELEDYNE
Everywhere you look

SHI - BOC Tanks 2 clip,15/05/2024 04:23:01,Burrows, Robert,SHI - Defence & Space

Palestine Action
@Pal_action

The roof of Teledyne's Shipley weapons factory is starting to come off.

The factory manufactures components for Israel's missiles and fighter jets — that's why actionists are shutting it down! #Nakba76



8:18 AM · May 15, 2024 · **106.9K** Views

Palestine Action
@Pal_action

By dismantling Teledyne's weapons factory in Shipley, Amareen and her comrades halted the production of parts for Israel's missiles and fighter jets.

Help her raise the legal fees needed to prove who the real criminals are in the upcoming trial 👇

From gofundme.com

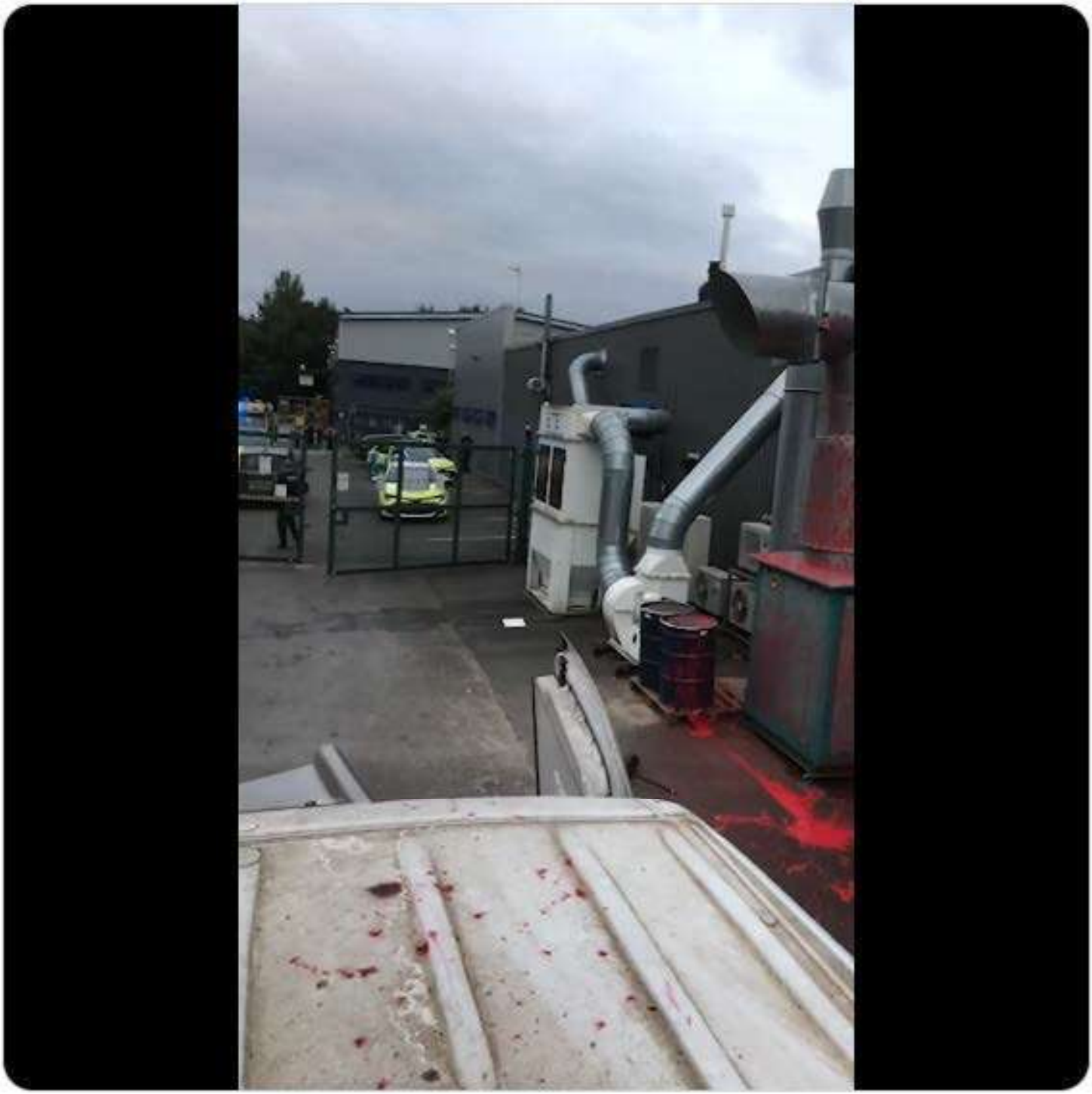
2:23 PM · Jul 9, 2024 · **39.8K** Views

Bromborough (Wirral)

05/07/2024

Palestine Action
@Pal_action

BREAKING: Palestine Action rammed a van through the gates of Teledyne's Wirral factory, forcing workers to stop producing parts for Israel's F-35 fighter jets



10:10 AM · Jul 5, 2024 · **184.2K** Views

Palestine Action @PaL_action · Jul 5

Three actionists arrested after they disrupted Teledyne's Wirral factory, halting the manufacture of parts for Israel's F-35 fighter jets.

Mobilise in their support at Birkenhead police station, Mortimer St, CH41 5EU!

26 333 620 21K

Palestine Action @Pal_action · Jul 6

All released after they shut down the Wirral-based manufacturer of Israel's F-35 fighter jet parts

206 2K 7.4K 98K

Bromborough (Wirral)

02/10/2024

CLEAN ROOM

Palestine Action @Pal_action · Oct 2

Three actionists arrested after they brought the production of crucial parts for Israel's F-35 fighter jets to a standstill.

Mobilise at Wirral Custody Suite, Birkenhead, CH41 8BA to make clear that the public know who the real criminals are!

42 685 1.7K 42K

Palestine Action @Pal_action · Oct 2

According to a senior Teledyne manager, contamination of their clean rooms could stop production for up to 12 months.

Actionists just got through to the clean room for Israel's F-35 fighter jet parts.

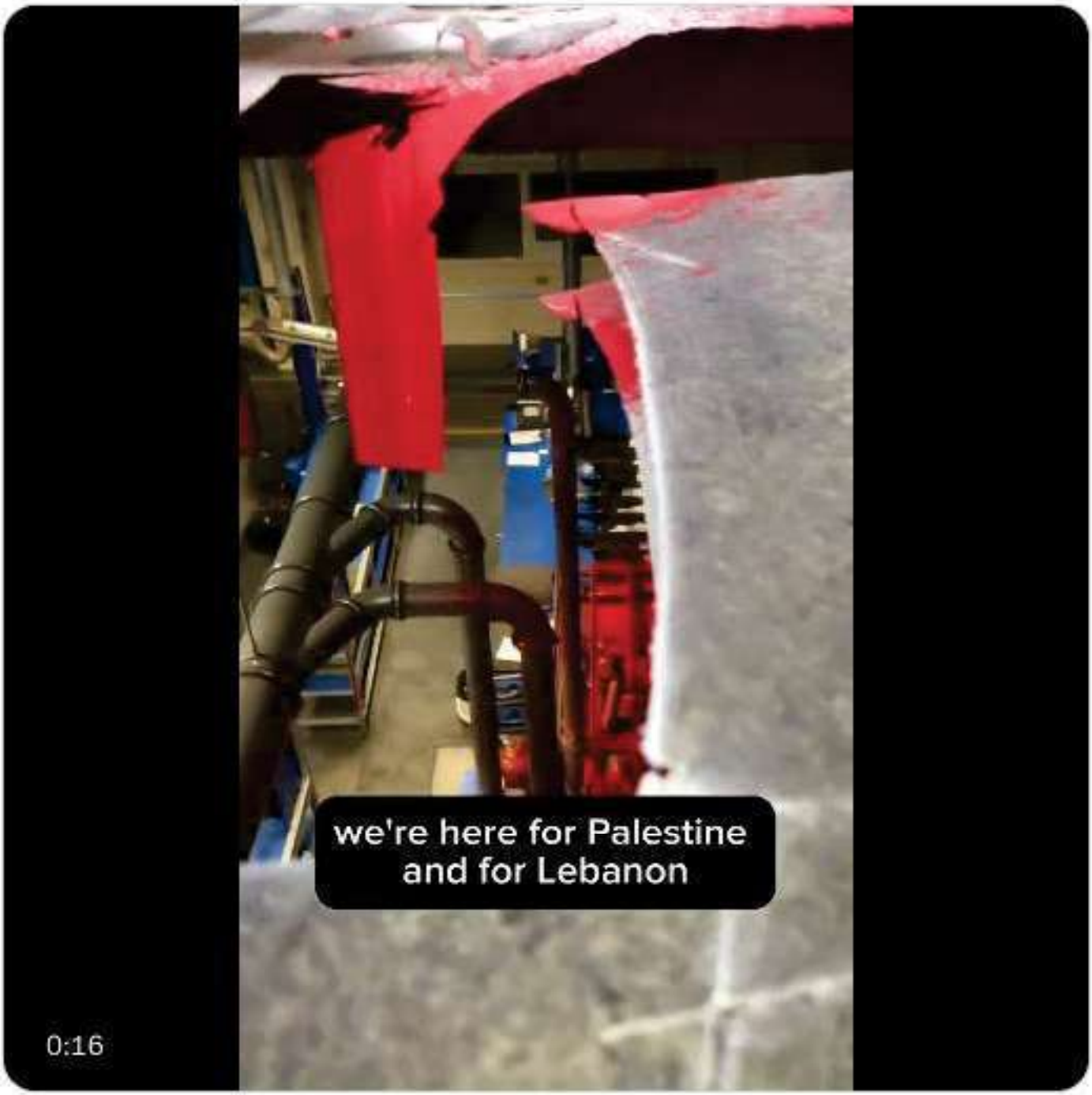
890 7.5K 28K 2.5M

Palestine Action @Pal_action · Oct 2

Contamination of this clean room will cause severe disruption to the production of Israel's F-35 fighter jet components.

When our government fails to abide by their legal duty to end complicity in genocide, it's up to ordinary people to take action.

Watch this space.



215 2.8K 11K 312K

Palestine Action @Pal_action · Oct 3

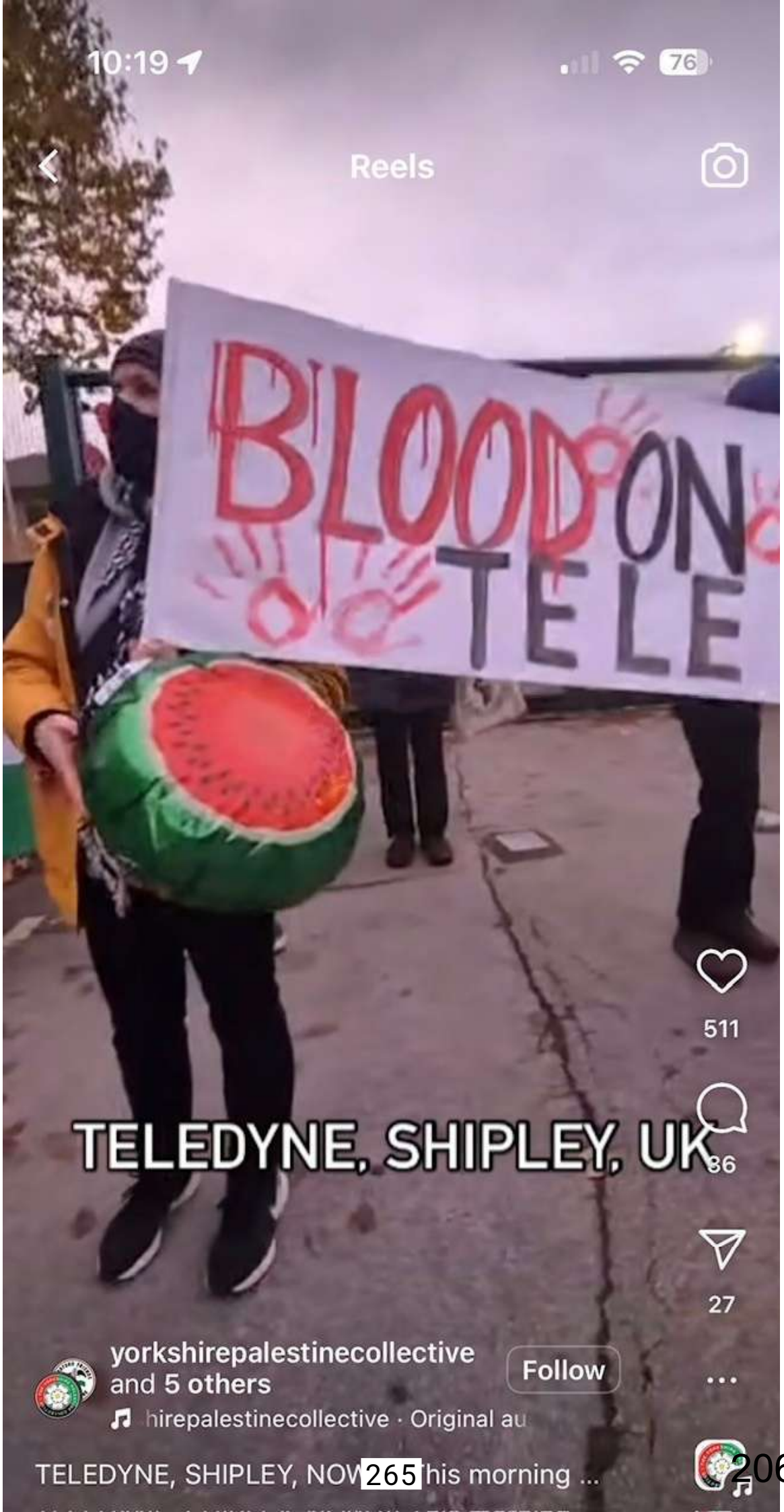
BREAKING: According to British police, Teledyne's production of crucial parts for Israel's F-35 fighter jets could be disrupted for up to 18 months due to this action.

> **Palestine Action** @Pal_action · Oct 2
>
> According to a senior Teledyne manager, contamination of their clean rooms could stop production for up to 12 months.
>
> Actionists just got through to the clean room for Israel's F-35 fighter jet parts.

573 5.7K 21K 690K

Shipley

30/10/2024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his morning ...

PEACE

Shipley

20/11/2024

bfdfriendsofpalestine and **yorkshirepalestin...**

♫ Lowkey · Long Live Palestine Part 1

191 20

bfdfriendsofpalestine Activists braved the cold today to protest outside Teledyne, to send a clear message: not on our doorstep, not in the country, full arms... more

20 November

bfdfriendsofpalestine and **yorkshirepalestin...**
Shipley, Bradford, United Kingdom

191 20

bfdfriendsofpalestine Activists braved the cold today to protest outside Teledyne, to send a clear message: not on our doorstep, not in the country, full arms... more

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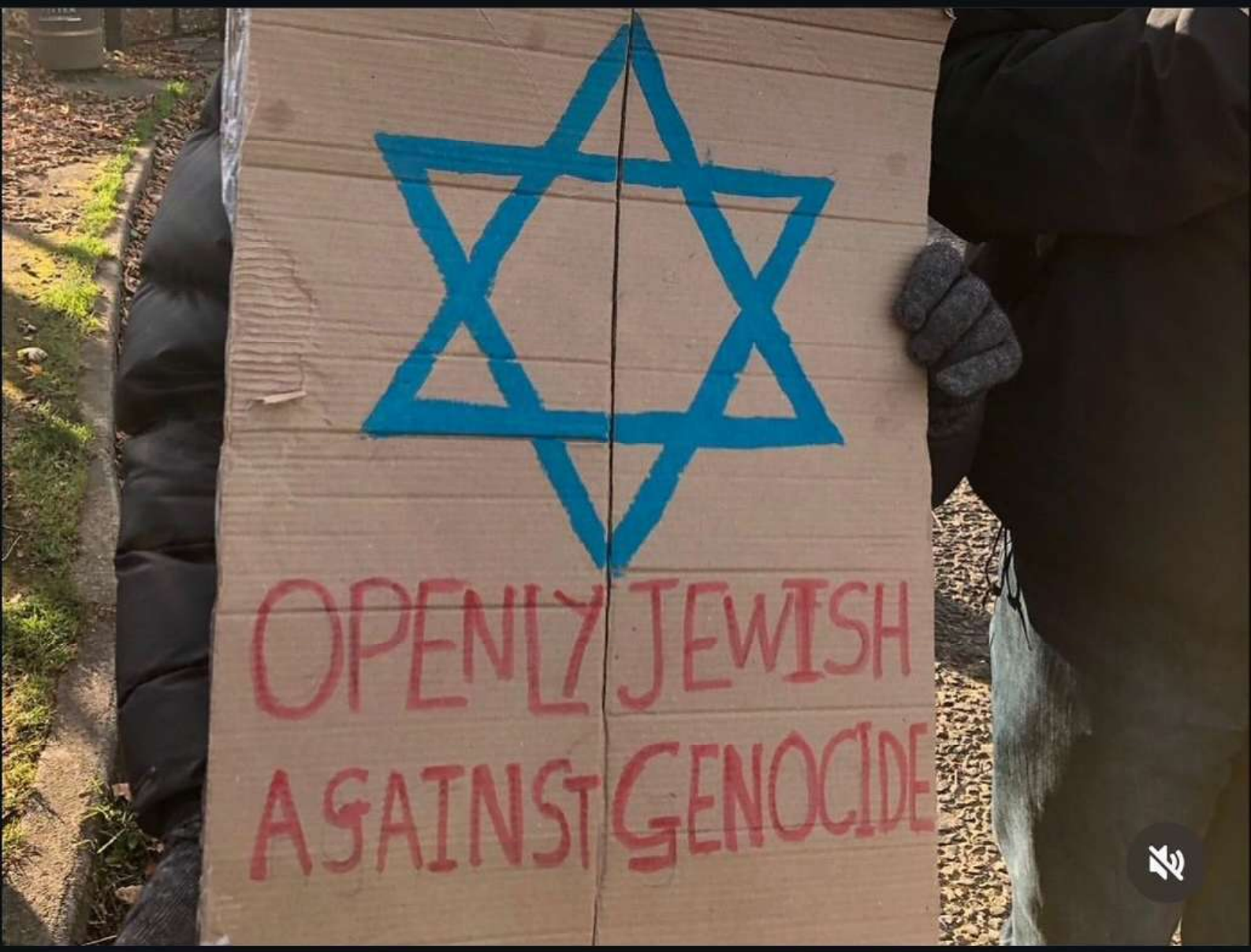

191 20

bfdfriendsofpalestine Activists braved the cold today to protest outside Teledyne, to send a clear message: not on our doorstep, not in the country, full arms... more

20 November

Shipley

28/11/2024

TARGET
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THE
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POLICE
IMDmilo.com/Alamy Live News

فلسطين
CHILDREN ARE
NOT A TARGET
IMDmilo.com/Alamy Live News

IMDmilo.com/Alamy Live News

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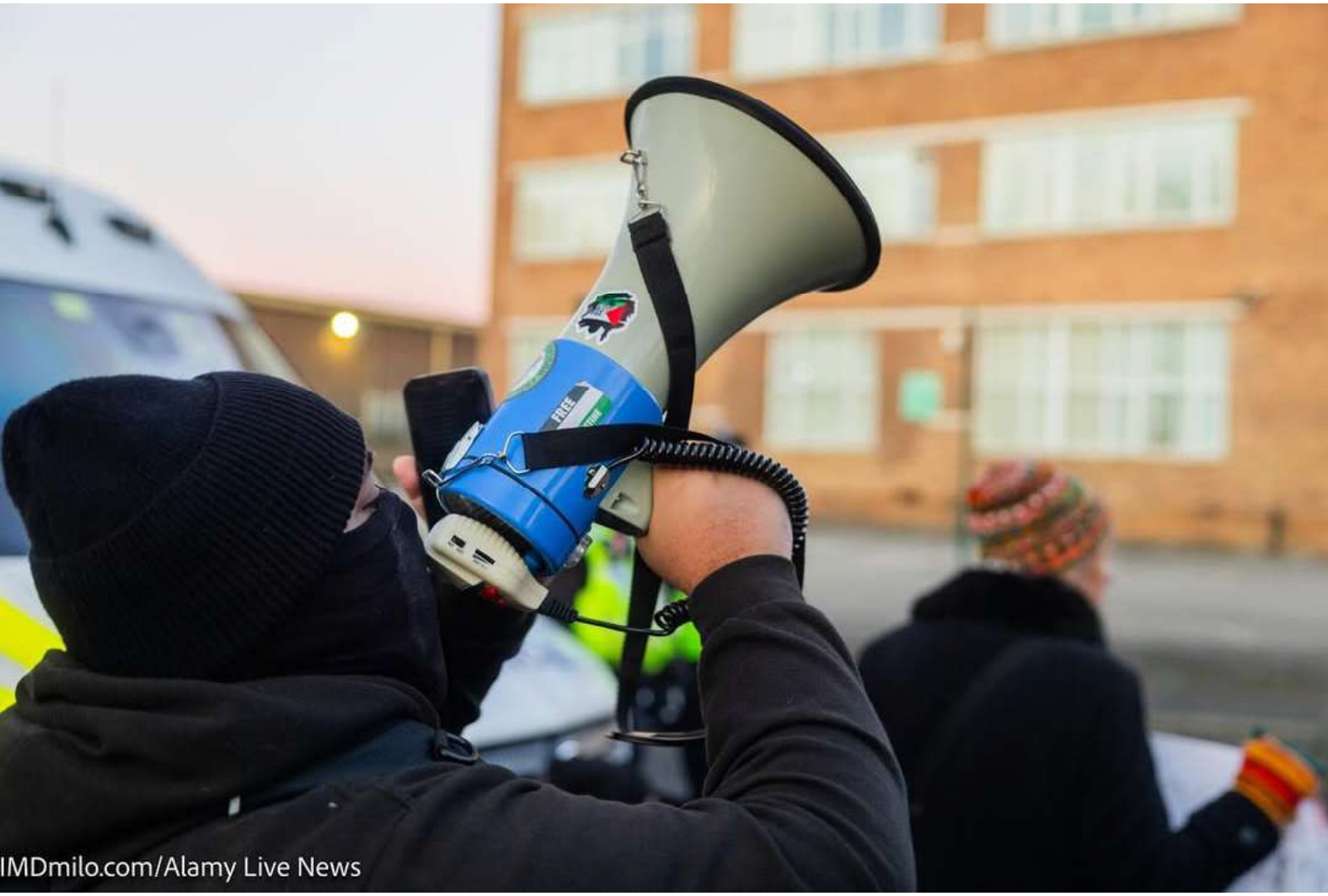
END THE
OCCUPATION
IMDmilo.com/Alamy Live News

TELEDYNE SHIPLEY
MAKES PARTS FOR:
• AGM-HARPOON
• AIM-120 AMRAAM
• AGM-114 HELLFIRE MISSILES
• F-35 FIGHTER JETS
AND SENDS THEM TO
ISRAEL TO MASSACRE
PALESTINIANS
IMDmilo.com/Alamy Live News

POLICE
PEACE
AND
JUSTICE
DYA
IMDmilo.com/Alamy Live News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Campaign Against Arms Trade
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POLICE
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IMDmilo.com/Alamy Live News

IN THE HIGH COURT OF JUSTICE **CLAIM NO.**
KING'S BENCH DIVISION

B E T W E E N :

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

FIRST 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 support of the Claimant's Claim for final injunctive relief and its Application for interim injunctive relief and an alternative service order. The Claim and Application is brought (at this time) against 7 Named Defendants and four defined categories of Persons Unknown who the Claimant reasonably apprehends will (i) trespass on the Claimant's land, (ii) interfere with the Claimant's (and their licensees' rights) to access the public highway from the Claimants' land, and (iii) cause a public nuisance by obstructing the highway.

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. This statement was prepared through video calls, telephone calls and email correspondence with officers and employees of the Claimant, and the Claimant's external legal representatives.

4. I exhibit to this witness statement a bundle of documents marked **MS1**. All references to that exhibit are in the format **MS1/page number.**

5. I understand that the factual background to these proceedings shall be set out in the witness statement made by Mr Nicholas James Wargent, also in support of the Claim and Application. I will not repeat any of that content here. Rather, in this witness statement I shall address:

   i. Why the Application for interim relief is made on short notice;
   ii. The need for a 'Persons Unknown' injunction;
   iii. The need for interim injunctive relief, by reference to the *American Cyanamid* and *Vastint* tests (in relation to the named Defendants);
   iv. The need for injunctive relief against Persons Unknown, by reference to the *Wolverhampton* test;
   v. The prohibitions sought;
   vi. The need for alternative service orders;
   vii. Full and frank disclosure.

Background

6. The land that the Claimant is seeking to protect by way of injunctive relief is land on which it operates its business. Those sites are:

   i. The **'Shipley Site'** (Teledyne UK Limited, Airedale House, Acorn Park, Shipley BD17 7SW);

   ii. The **'Lincoln Site'** (Teledyne UK Limited, 168 Sadler Road, Lincoln LN6 3RS);

iii. The **'Wirral Site'** (Teledyne UK Limited, Unit A, 6 Tebay Road, Bromborough, Birkenhead, Wirral CH62 3PA);

iv. The **'Chelmsford Site'** (Teledyne UK Limited, 106 Waterhouse Lane, Chelmsford CM1 2QU);

v. The **'Presteigne Site'** (Teledyne UK Limited, Broadaxe Business Park, Presteigne LD8 2UH); and

vi. The **'Newbury Site'** (Teledyne UK Limited, Reynolds Navigation House, Canal View Road, Newbury RG14 5UR).

7. As explained in the witness statement of Mr Wargent, each of the above six sites is owned by the Claimant, Teledyne UK Limited. Whilst the Claimant owns and/or operates its business from other sites throughout the county, injunctive relief is sought only in relation to these six sites; of the Claimant's sites, only these six addresses have been published on the 'targets' section of the 'Palestine Action' website: https://elbitsites.uk/company/2/. Further, as Mr Wargent explains in his witness statement, the 'Underground Manual' produced by Palestine Action encourages those who wish to take direct action to select a target for that action from the 'targets' section of the website (and contains a link to the same), and again expressly refers to the Claimant in the 'targets' section of the manual: https://elbitsites.uk/manual.pdf.

8. The Claimant seeks injunctive relief to restrain trespass in relation to each of the six sites. The Claimant has taken a measured and proportionate approach to this Claim and Application and, at this time, seeks injunctive relief to restrain interference with the common law right to access the highway obstruction of the highway in relation to the Shipley site only.

Short notice

9. Following the Supreme Court's decision in *Wolverhampton City Council & Ors v London Gypsies and Travellers & Ors* [2024] 2 WLR 45, injunctive relief against newcomer persons unknown is always made on a 'without notice' basis (see paras 139, 142 ad 143).

10. As against the Named Defendants in this Claim, the interim relief will be sought on a short notice basis (although the Claimant of course accepts that it is still subject to the same duty of full and frank disclosure as it would be if the Application was made without any notice). Specifically, it is proposed that within the 24 hours before the hearing, notice of the Claim, Application and hearing will be given by email to the email addresses set out in paragraph 3(ii) of the draft Order (those being the known addresses of the relevant protest group).

11. It is proposed to give only short notice of the Application hearing because:

    i. If full notice was given to the Named Defendants and relevant protest groups, the unlawful acts of protest and resulting harm apprehended by the Claimant could be accelerated and occur before injunctive relief is in place. Direct-action protest tactics are crude, and easily done with minimal planning, yet can have extremely disruptive and harmful effects. For example, a handful of protestors (or even just a single protestor) attending a site and locking on to an entrance gate can cause access to a site to be blocked, affecting (and event halting) operations at the site. Such actions can be undertaken with minimal planning, and it is clear (as will be explained in the evidence in support of this Claim and Application) that the Palestine Action cause has a large following that can be mobilised to undertake such actions (and possibly at short notice).

    Further, as shall also be explained in the course of the evidence, historic acts of protests at the Claimant's sites have been incredibly destructive – if further similar acts were accelerated and undertaken upon notice of the Application being given, the Claimant could again suffer significant property damage and financial loss. The losses already incurred have been significant and are unsustainable. It is submitted that the Claimant should not be exposed to the risk of further losses being incurred prior to the securing on injunctive relief; relatedly

ii. There has been an increased frequency in incidents of alleged unlawful protest at the Shipley Site in recent weeks, such that it is clear that there is a group of protestors who are actively interested in engaging in such acts. It is reasonable to believe that these people could mobilise at short notice and cause further disruption to access to the Shipley Site;

iii. The Claimant apprehends further acts of protest over the Christmas period when, typically, people (including protestors) are not at work and have time at their disposal. To that end, the court will see from the witness statement of Mr Wargent that an arson attack did in fact occur on 26 December 2023 at the Shipley Site. Consequently, the Claimant has needed to move to secure this relief before the end of the court term. Further, it is notable that the incident at the Shipley Site on 2 April 2024 took place during the Easter school vacation (and the day after Easter Monday), and the incident at the Shipley Site on 30 October 2024 occurred during the October half-term school vacation.

Persons Unknown

12. The Claimant seeks relief against various categories of Persons Unknown, as well as relief against Named Defendants (who have been identified by reason of their arrests at the Shipley Site throughout the course of 2024; as explained in the witness statement of Mr Wargent, efforts to identify those arrested at the Wirral Site are ongoing).

13. The Claimant understands that it must use reasonable endeavours to identify, name and serve individual defendants to the Claim. I understand from Counsel that, in other recent injunctions that have been granted by the Courts to restrict unlawful protest activity, the naming of defendants is often achieved in collaboration with the Police upon the arrest of protestors for related offences (such as public nuisance, aggravated trespass and public order offences).

14. The Claimant is also aware that where an alleged wrongdoer is identified, but remains anonymous, the Claimant will be expected to join this person as a defendant to the proceedings and identify them by way of photograph or description, and ascribe that person a cipher.

The need for a Persons Unknown injunction

15. In the circumstances of this Claim, a Persons Unknown injunction is required as it is not possible to name and identify at this time all those who may attend the Claimant's sites and engage in unlawful acts of protest.

16. As Mr Wargent sets out in his witness statement, the primary group associated with the threatened protest (Palestine Action) is actively recruiting and seeking new members, is hosting several workshops and direct action training days,[1] and is encouraging like-minded people to engage in such acts (and instructing them how to do so) by way of the aforementioned Underground Manual. The group clearly has a fluctuating membership. It is impossible to identify all those persons who are associated with cause and who will engage acts of unlawful protest (with identification typically occurring once a protestor is arrested), or those persons who are not yet associated with the cause but who will come to be so and engage in acts of unlawful protest.

17. The movement is clearly gaining momentum at this time (as evidenced by the increasing frequency of attacks on the Claimant's sites), and it is a sad reality that the situation in the Middle East continues to deteriorate, which may encourage those who are sympathetic to the Palestine Action cause to join in and engage in direct-action protest. Further, it is likely that there will be other people sympathetic to the cause, but who are not members of a specific group, that engage in direct-action and acts of protest. Where 'new-recruits' attend the Claimant's sites and engage in unlawful protest, the Claimant would be unprotected from such unlawful activity if there was not a Persons Unknown injunction in place.

18. As Mr Wargent also explains in his witness statement, the Palestine Action Underground Manual instructs those who engage in direct action how to keep their identity concealed (including by the use of facial coverings, loose clothing, burner phones, various ways of reducing or eliminating digital footprint, and also by suggesting various tactics to evade arrest); if these instructions are followed, it will be difficult for individuals to be identified.

[1] Mr Wargent exhibits to his witness statement the 'workshops' page of the Palestine Action Website, accessed on 27 November 2024 and 1 December 2024, which details upcoming workshops on direct action: https://palestineaction.org/training/.

19. Even once the pool of named and identified defendants is settled for the purposes of a final hearing of the Claim, the nature of the protests and the above observations mean that continuing injunctive relief against the defined categories of Persons Unknown is also required. It is inevitable that there will be persons who are both unknown and unidentified (ie. 'newcomers') when final relief (if any) is granted against the Named Defendants, who will later commit the wrongs complained of in these proceedings. The grant of final relief against Named Defendants will do nothing to deter Persons Unknown.

20. Overall, and for the reasons that I have set out above, it is highly likely that there will be protestors that attend the Claimant's sites for the first time, and undertake unlawful protest and engage in the conduct complained of, including *after* the granting of any final injunctive relief against the Named Defendants. If the Claimant did not benefit from a Persons Unknown injunction that captures these newcomers, the Claimant would not be protected against the unlawful conduct.

The need for interim relief: the Named Defendants

21. Mr Wargent, in his witness statement, has explained how and why the Claimant has named the Named Defendants to this Claim and Application, and the ongoing efforts to name further defendants. I will not repeat the same here.

22. The Claimant seeks interim injunctive relief against the Named Defendants, pursuant to CPR 25.1(1)(a) in the form set out in the Draft Order annexed to the Application Notice. Therefore, I shall address in brief the test for such injunctive interim relief, as set out in *American Cyanamid Co v Ethicon Ltd* [1975] AC 396 (HL), that being:

    i. Is there a serious question to be tried; if yes
    ii. Would damages be an adequate remedy for a party injured by the court's grant of, or its failure to grant, an injunction; and
    iii. If not, where does the balance of convenience lie?

23. Counsel will of course make full submissions on the test, and how it is met in this Application, during the course of submissions.

24. I understand that Counsel will also deal with the test for precautionary relief, as found in *Vastint Leeds BV v Persons Unknown* [2019] 4 WLR 2, during the course of submissions (with reference to the relevant evidence). The relevant evidence to which Counsel will direct the court is contained primarily in Mr Wargent's witness statement, but also in part this witness statement. As the court will be aware, the *Vastint* test requires the following two questions to be asked and answered in the affirmative: (i) is there a strong probability that unless restrained by injunction the defendant will act in breach of the claimant's rights? and (ii) if the defendant did act in contravention of the claimant's rights would the resulting harm be so irreparable that, notwithstanding the grant of an immediate interim injunction (at the time of the actual infringement of the claimant's rights) to restrain further occurrence of the acts complained of, a remedy in damages would be inadequate?

Serious issue to be tried

25. I submit that there is a serious issue to be tried in these proceedings. It is clear from the evidence that has been submitted in support of the Claim and the Application that the Claim is nether frivolous or vexatious. The evidence provided by the Claimant makes a strong (and not merely a prima facie) case on the causes of action pursued.

26. Significant harm has already been suffered by reason of acts of unlawful protest that have occurred at the Claimant's Presteigne, Chelmsford, Wirral and Shipley Sites – and specifically by reason of acts of trespass with significant aggravating features (including as recently as 2 October 2024). Further, protestors attended the Shipley Site as recently as 28 November 2024, and blocked access to the site by forming a human barrier at the entrance gate.

27. Furthermore, to the extent that the Claimant is seeking *quia timet* relief (i.e. for acts that it apprehends, as opposed to acts that it has already experienced), that relief is sought on the basis there has already been a significant increase in the frequency of acts of unlawful protest at the Claimant's sites, it is likely that protestors minded to engage in such action will have more time at their disposal over the Christmas holiday period, and the unfortunate continuing and deteriorating situation in the Middle East is likely to continue to fuel the cause of this protest movement. Further, the addresses of the six sites that the Claimant

seeks to protect are published and branded as 'targets' on the Palestine Action website, with the Claimant also referred to as a target in the 'Underground Manual' which instructs protestors in how to carry out direct action protest.

Adequacy of damages

28. In the first instance, I submit that the granting of the interim relief sought would not cause the defendants to suffer any inconvenience or injustice for which they might be entitled to be compensated, as the interim relief sought seeks to restrain and prohibit only unlawful conduct. It follows that the defendants will not suffer any financial loss which would be required to be compensated by way of an award of damages.

29. In the event that the Court does not agree with me on the above, I submit that there is no loss, damage, injustice or prejudice that could not be compensated by way of an award of damages, if necessary; there is no irreversible or irremediable harm that would be suffered by the Defendants.

30. On the other hand, the Claimant would suffer prejudice and inconvenience should the grant of interim relief be refused, which prejudice and inconvenience cannot be adequately compensated by way of damages (or at least an award of damages in a sum that the Defendants are likely to be able to meet). In particular, as explained by Mr Wargent in his statement:

    i. To date, the cumulative loss suffered by the Claimant by way of repair and clean-up costs following acts of trespass by protestors is currently in excess of £2.25 million (and is expected by the Claimant to rise as certain repairs are ongoing);

    ii. There has been significant disruption to operations and productivity at sites by reason of sites being shut down because of trespassers being on site, and disruption to access at sites. For example, the business was unable to ship approximately US$1m of sales by reason of the incident at the Presteigne Site in December 2022, and loss of revenue in excess of £300,000 was suffered by reason of the incident at the Shipley Site in April 2024. These are just two examples, with Mr Wargent giving others in his statement;

iii. The Claimant continues to incur increasing costs of security at it sites, as well as the costs of repairing the damage caused by protestors in the course of acts of trespass. As set out by Mr Wargent in his witness statement, the cost of the additional security put in place at the Claimant's sites is in the sum of US$2.7m for 2024 alone.

iv. The Claimant's sites form a critical part of the UK defence supply chain. Disruption to production can weaken the UK's ability to protect its security and can place serving personnel at increased risk of shortages and equipment failure;

v. Three of the Claimant's sites have Facility Security Clearance status, and hold assets that are classified as SECRET or above. If unauthorised persons, such as trespassing protestors, accessed these assets, that cannot be adequately compensated for by way of damages;

vi. The continued targeting of the Claimant and its sites risks (unfair) reputational damage to the Claimant.

31. I respectfully urge the Court not to forget that the interim relief is sought, in large part, to restrain dangerous activities. The primary cause of action is trespass, and the acts of trespass that have already occurred included significant aggravating factors such as climbing on buildings, arson, the smashing of windows and skylights, and entering the buildings on sites. As Mr Wargent explains in his statement, many of the Claimant's sites house hazardous and sensitive materials and equipment. The protestors put themselves and others at physical risk by such actions; physical risk cannot be adequately compensated for by way of damages.

32. It is not just the Claimant who will suffer harm and loss as a result of the apprehended unlawful protest activity. Disruption to the highway outside of the Shipley Site could have a particular impact on surrounding businesses – these sites and their neighbours are served by single (and effectively a dead-end) road, such that access to these sites could also be compromised by disruption on the highway. Further, if mass disruption was caused, such

that the access roads to either of these sites was completely blocked, that could have an adverse impact on the A6038 (at the Shipley Site).

33. It is also impossible for an undertaking in damages to be obtained from Persons Unknown. Further still, even where the Claimant has been able to identify the Defendants, there is no guarantee that they would be able to meet an award of damages or be able to give the necessary undertaking. In fact, I would suggest that it is incredibly unlikely that any Defendant could meet such an award or give such an undertaking, given the value of the losses apprehended by the Claimant.

34. Therefore, I submit that whilst no harm would be suffered by the Defendants, for which they might be entitled to be compensated, if they did in fact suffer any harm, damages would be an adequate remedy for the same. Conversely, the Claimant, if interim relief was refused, would suffer harm which could not be adequately be compensated by way of damages and, even if it could be so compensated, it is not clear whether the Defendants could even make good on the remedy.

Balance of convenience

35. The Claimant is not trying to prohibit or restrain peaceful and lawful protest. What the Claimant seeks to prohibit and restrain is protest activity that goes beyond what is peaceful and lawful.

36. I submit that the balance of convenience lays firmly in favour of granting the interim relief sought. In particular:

    i. The relief sought does not interfere with the Defendants' right to protest peacefully and lawfully – they may still attend the Claimant's sites and protest, but must do so without trespassing and, in the case of the Shipley Site, without obstructing the highway or interfering with the Claimant's common law right to access the highway;

    ii. The relief sought only seeks to restrain unlawful conduct (such as obstruction of the highway, trespass and interference with access rights);

iii. Without the grant of the relief sought, the Claimant and its business will experience significant disruption and financial loss.

37. On the whole, I submit that the relief sought represents a fair balance between the rights of the Defendants (including their Article 10 and Article 11 rights, where applicable, which are qualified rights), and the rights of the Claimant. The relief sought by the Claimant seeks to provide boundaries within which the protestors may engage in meaningful protest, whilst safeguarding the Claimant's rights.

Section 12 Human Rights Act 1998

38. The Court is reminded that it must consider section 12 of the Human Rights Act 1998, which provides that:

> *(1) This section applies if a court is considering whether to grant any relief which, if granted, might affect the exercise of the Convention right to freedom of expression.*
>
> *(2) If the person against whom the application for relief is made ("the respondent") is neither present nor represented, no such relief is to be granted unless the court is satisfied—*
>
> *(a) that the applicant has taken all practicable steps to notify the respondent; or*
>
> *(b) that there are compelling reasons why the respondent should not be notified.*
>
> *(3) No such relief is to be granted so as to restrain publication before trial unless the court is satisfied that the applicant is likely to establish that publication should not be allowed.*

39. Counsel will make submissions on the relevance and application of section 12 at the hearing of the Application.

Undertaking in damages

40. I am instructed that the Claimant can and does offer an undertaking in the sum of £50,000, and that the Claimant is able to meet this undertaking. I note from the accounts filed by the Claimant at Companies House that it recorded profits after tax for the year ended 31 December 2023 in excess of £29.7 million.

Necessary and proportionate

41. Finally, I submit that the interim relief sought strikes the right balance between the rights of the Defendants to protest, and the rights of the Claimant. The relief sought will allow the defendants to exercise their Article 10 and Article 11 rights and engage in meaningful protest, whilst also ensuring that the Claimant is able to go about its day-to-day business with only minimal disruption, and to be protected from avoidable damage to its property and financial risk and, in some cases, dangerous activity.

Persons Unknown: the *Wolverhampton* test

42. Counsel will of course in submissions deal with the *Wolverhampton* test and guidance in relation to the Claim and Application against Persons Unknown, and how the same is met in this case.

43. For the purposes of this witness statement, I highlight that the test to be applied when considering and grating relief against newcomer Persons Unknown is, in effect, a higher threshold than is applied under *American Cyanamid* (which does not apply in such cases). Namely, there must be a 'compelling justification' for the order sought (para 167).

44. Further, as required by the *Wolverhampton* guidance, the order sought at the return date will be temporally limited to five years, and will be subject to an annual review. I understand that this is the same Order than has been made in relation to Persons Unknown in many recent protestor injunctions. For example, I exhibit the Orders made in:

    i. *Arla Foods Limited & Anr v Persons Unknown & Ors* [2024] EWHC 1952 (Ch) **MS1/1 – 23**;

ii. *Thurrock Council & Anr v Adams & Ors* [2024] EWHC 2576 (KB) **MS1/24 – 61**;

iii. *London City Airport Limited & Anr v Persons Unknown* [2024] EWHC 2557 (KB) **MS1/62 – 77**; and

iv. *Heathrow Airport Limited v Persons Unknown & Ors* [2024] EWHC 2599 (KB) **MS1/78 – 89**.

The prohibitions sought

45. The prohibitions in the draft Order have been crafted as they have to (i) match the causes of action that have been pleaded, (ii) respond to the specific unlawful acts of protest that have been experienced and which are apprehended and (iii) ensure that lawful acts of protest are not captured. Accordingly, it is submitted that the prohibitions sought are proportionate.

46. There have, in recent years, been several high-profile direct action protest campaigns (including, but not limited to, those conducted by groups such as Just Stop Oil and Animal Rising – formerly known as Animal Rebellion). Those groups and protest movements have by now a well-known arsenal of direct action tactics, which include (but are not limited to):

i. Entering oil terminals, fuel refineries or dairy and dairy distribution sites (depending on the protest movement). Extensive acts of criminal damage have often been caused when protestors enter and occupy the sites and/or protestors often lock onto infrastructure at the sites (including in the roofs and at height);

ii. Sitting or standing on roads to obstruct the same and/or obstructing access to specific sites;

iii. Protestors gluing themselves, or otherwise 'locking on', to roads, road furniture, private land and fencing, each other and vehicles (including HGVs which they have 'on-boarded') – often with the intention to obstruct roads or accessways;

iv. Tunnelling under the highway.

47. To date, protestors operating under the banner of Palestine Action and other related groups have deployed some (but not all) of these tactics, and the prohibitions in the draft order have been crafted accordingly.

48. Prohibitions against the interference with the Claimant's common law right to access the highway and obstruction of the highway are sought in relation to the Wirral and Shipley Sites. As is explained in Mr Wargent's statement, acts of protest of this nature are becoming increasingly common at the Shipley Site; incidents have occurred on 30 October and 20 and 28 November 2024 in which access to the site was blocked, and the location and single access points to the site makes it especially vulnerable to such a blockade. Further, it is known that blocking access and obstruction of the highway is a key feature of direct action protest. If the Claimant sought only a prohibition against trespass and interference with the common law right to access the highway, it is entirely likely that the protest would just be moved from the gates of the site and further down the carriageway of the highway, such that it would have the same effect, and would not be caught by the injunction and prohibited.

49. In summary, it is submitted that the Claimant has taken a proportionate approach and sought only the prohibitions that are necessary at this time (that being trespass prohibitions at all six sites, and the additional common law right and public nuisance prohibitions for the Shipley Sites). If it transpires that further and additional relief is required, the Claimant understands that it would need to make a variation application to seek the same.

Alternative service

50. Finally, the Claimant seeks alterative service orders for service of the Claim Form, Application for an Interim Injunction, the supporting documents relied on in this Claim, and this Order. The terms of the order sought is set out in the draft Order annexed to the Claim Form and Application Notice. I shall not repeat the same here, but refer the Court to the Draft Order.

51. I submit that the order sought is such that the measures can be reasonably expected to bring the proceedings and injunction to the Defendants' attention (as per *Cameron v Liverpool Victoria Insurance Co Ltd* [2019] UKSC 6). In particular:

i. It can be reasonably expected that placing clear and unequivocal signs on the perimeter of the Claimant's Sites, which advise of the existence of the injunction and provide the link and QR code by which the injunction and Claim documents may be accessed, will ensure that anyone who attends the Claimant's Sites to protest will become aware of the injunction and the proceedings. I exhibit at **MS1/90** a draft of the sign that the Claimant proposes to place on the access points to, and around the perimeter of, its sites. The sign reads:

> WARNING INJUNCTION
>
> This area is subject to a High Court injunction which places restrictions on some protest activities. You must not enter this site.
>
> Breach of the injunction could lead to imprisonment.
>
> For details, please see: [insert link and QR code]

By the time the Application for interim relief is heard, these signs will already be in production to ensure that they can be distributed to the Claimant's sites and erected to ensure that any injunction is served in good time before the Christmas holiday period.

ii. The groups that have so far identified themselves as being interested in acts of protest at the Claimant's Sites are Palestine Action, Bradford Friends of Palestine and the Palestine Solidarity Campaign (specifically the Chelmsford Branch). It can be reasonably expected that by sending the injunction and Claim documents to the email addresses that the Claimant has been able to find for those groups, including the applicable regional branches, the injunction and proceedings will come to the attention of that group and its membership (who are the persons likely to engage in acts of protest). To that end, the proposed email addresses are:

info@palestineaction.org; actions@palestineaction.org;
media@palestinecampaign.org; branches@palestinecampaign.org;
info@palestinecampaign.org; palestinesolidaritybradford@gmail.com;
pscchelmsford@gmail.com; lincolnpalestine@gmail.com;
liverpoolfopal@gmail.com; pscshrop@gmail.com;
bfdfriendsofpalestine@yahoo.com;

iii. It can be reasonably expected that a person who is intending to protest at the Claimant's sites would have an interest in the Claimant and its business and visit the Claimant's website. Therefore, placing a copy of the injunction and Claim documents on the website can be reasonably expected to bring the injunction and proceedings to the Defendants' attention. In practice, a link to a webpage that has been set up for the specific purpose of making the documents available will be provided on the Claimant's main website; finally

iv. Where addresses for a Defendant (for which, see below) are known, it can be reasonably expected that delivering the injunction and Claim documents to those addresses will bring the injunction and the proceedings to the Defendant's attention.

52. In any event, the above clauses are to be read conjunctively and not disjunctively. The Claimant is aware that personal service of any injunction order would of course be preferable; the alternative service provision does not oust the possibility that personal service could still be effected if and when a protestor attends one of the Claimant's sites, and it is safe to effect service in that manner.

53. Finally, where a Defendant requests service by email, or where a solicitor is instructed, service by email or by service on the solicitor respectively can be reasonably expected to bring the injunction and proceedings to the defendant's attention.

54. As Mr Wargent has explained in his witness statement, the Claimant does not (at the time of finalising this statement) have addresses for any of the Named Defendants. However, to obtain addresses in order to be able to assist with service, disclosure applications pursuant to CPR 31.17 are being made, with the Respondents to those Applications being West

Yorkshire Police and Merseyside Police. It is hoped that the necessary data will be obtained in time for any return date hearing in this Application.

Full and frank disclosure

55. Both I and the Claimant acknowledge that, following *Wolverhampton*, the relief against Persons Unknown is always without notice. Further, the interim relief is being sought against the Named Defendants on a short notice basis. Accordingly, a duty of full and frank disclosure arises.

56. With that in mind, I should emphasise the following:

    i. None of those persons who have attended and blocked access to the Shipley Site on have been named as Defendants. No arrests were made by West Yorkshire Police, such that the identities of these persons are not known. The incidents were not documented on the Palestine Action website (the protest appears to have been organised by the Bradford Friends of Palestine group), nor were any photographs captured by the Claimant. In relation to 30 October 2024, there is a very short video on the Bradford Friends of Palestine Instagram page, to which Mr Wargent has referred in his witness statement, which shows the protestors outside the gate to the site. However, they all appear to be wearing either face coverings or hoods/hats (or both), or are facing away from the camera as it pans around, such that identification of these persons is impossible.

    The quality of the Claimant's CCTV imaging also does not assist with identification. For example, a still CCTV image has been obtained of a female protestor, but she is wearing a black face covering and loose-fitting black clothing with no distinctive markings. Her only distinguishing feature is that she appears to have blonde hair. The Claimant has taken the view that the image is not of sufficient quality to enable the female to be given a cipher and added to the proceedings as a named defendant (with the image attached to the Claim Form). It would be impossible to tell if any other female who attended the Claimant's sites, and who happened to have blonde hair, was in fact the woman in the image;

ii. The Claimant has named as defendants only those persons who have been arrested whilst protesting at the Claimant's site throughout 2024 (i.e. it has not named those who were arrested throughout 2022 and 2023). The Claimant has taken that approach as those arrested in 2022 and 2023 have not re-attended the Claimant's sites. The Claimant does not know anything of the current status of these persons (including whether they continue to engage in acts of direct action protest under the banner of Palestine Action or similar), and therefore does not at this time apprehend their return to the Claimant's sites. In contrast, those arrested during 2024 are clearly still active direct action protestors, with an interest in protesting against the Claimant's business, and a tendency to engage in unlawful acts of protest;

iii. Four protestors were arrested at the Shipley Site on 15 May 2024. Only three of those persons have been named as Defendants. The fourth has been remanded into custody as they were involved in another Palestine Action protest at Barclays Bank (which has been the target of repeated protests that includes actions such as spray painting and the smashing of windows). As that person remains in custody, the Claimant does not reasonably apprehend that they will re-attend the Claimant's sites and engage in acts of unlawful protest at this time;

iv. On 11 May 2024, an incident occurred at one of the Claimant's sites in Scotland in which four people attended the site. Some windows were broken and there was some spray painting. The incident has not been linked to the Palestine Action group. Further, as this incident occurred at a site in Scotland, relief would not be sought in relation to this site in this Claim.

v. The Claimant is not yet able to fully consider its position in relation to the Wirral Site, it not having received necessary information from a third-party to enable it to do so. The Claimant intends to keep the relief sought in relation to the Wirral Site under review in advance of the return date.

Conclusion

57. It is clear that the threat of criminal prosecution alone is not sufficient to protect the Claimant's rights and guard against the acts of unlawful protest (especially aggravated

trespass) that have been suffered by the Claimant. Therefore, and for the reasons set out in this witness statement, I respectfully ask the Court to:

i. Grant interim injunctive relief against the Named Defendants, with a return date set for mid-January;

ii. Grant interim injunctive relief against Persons Unknown until the return date (at which a five-year order with an annual review will be sought);

iii. Make the alternative service order sought.

Statement of truth

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

M Singh

……

Manan Singh

Dated this **13th** day of December 2024

IN THE HIGH COURT OF JUSTICE **CLAIM NO.**
KING'S BENCH DIVISION

B E T W E E N :

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

EXHIBIT MS1

This is Exhibit MS1 referred to in the First Witness Statement of Manan Singh.

Claim No. BL-2022-001396

IN THE HIGH COURT OF JUSTICE
BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES
BUSINESS LIST (ChD)

In the matter of an Injunction

Before Jonathan Hilliard KC (sitting as a Deputy Judge of the High Court)
26 July 2024

B E T W E E N :

(1) ARLA FOODS LIMITED

(2) ARLA FOODS HATFIELD LIMITED

Claimants

-and-

(1) PERSONS UNKNOWN WHO ARE, WITHOUT THE CONSENT OF THE CLAIMANTS, ENTERING OR REMAINING ON LAND AND IN BUILDINGS ON ANY OF THE SITES LISTED IN SCHEDULE 2 OF THE CLAIM FORM ("the Sites"), THOSE BEING:

a. "THE AYLESBURY SITE" MEANING ARLA FOODS LIMITED'S SITE AT AYLESBURY DAIRY, SAMIAN WAY, ASTON CLINTON, AYLESBURY HP22 5EZ, AS MARKED IN RED ON THE PLANS AT ANNEXE 1 TO THE CLAIM FORM;

b. "THE OAKTHORPE SITE" MEANING ARLA FOODS LIMITED'S SITE AT OAKTHORPE DAIRY, CHEQUERS WAY, PALMERS GREEN, LONDON N13 6BU, AS MARKED IN RED ON THE PLANS AT ANNEXE 2 TO THE CLAIM FORM;

c. "THE HATFIELD SITE" MEANING ARLA FOODS HATFIELD LIMITED'S SITE AT HATFIELD DISTRIBUTION WAREHOUSE, 4000 MOSQUITO WAY, HATFIELD BUSINESS PARK, HATFIELD, HERTFORDSHIRE AL10 9US, AS MARKED IN RED ON THE PLANS AT ANNEXE 3 TO THE CLAIM FORM; AND

d. "THE STOURTON SITE" MEANING ARLA FOODS LIMITED'S DAIRY AT PONTEFRACT ROAD, LEEDS LS10 1AX AND NATIONAL DISTRIBUTION CENTRE AT LEODIS WAY, LEEDS LS10 1NN AS MARKED IN RED ON THE PLANS AT ANNEXE 4 TO THE CLAIM FORM

(2) PERSONS UNKNOWN WHO FOR THE PURPOSE OF PROTESTING ARE OBSTRUCTING ANY VEHICLE ACCESSING FROM THE HIGHWAY THE SITES LISTED IN SCHEDULE 2 OF THE CLAIM FORM

(3) PERSONS UNKNOWN WHO FOR THE PURPOSE OF PROTESTING ARE OBSTRUCTING ANY VEHICLE ACCESSING THE HIGHWAY FROM ANY OF THE SITES LISTED IN SCHEDULE 2 OF THE CLAIM FORM

(4) PERSONS UNKNOWN WHO ARE FOR THE PURPOSE OF PROTESTING CAUSING THE BLOCKING, SLOWING DOWN, OBSTRUCTING, OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF, OR ALONG THE ROADS LISTED AT ANNEXE 1A, 2A, 3A, AND 4A TO THE CLAIM FORM

(5) PERSONS UNKNOWN WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES ON TO ANY VEHICLE WHICH IS ACCESSING OR EXITING THE SITES LISTED IN SCHEDULE 2 OF THE CLAIM FORM

(6) PERSONS UNKNOWN WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES ON TO, ANY VEHICLE WHICH IS TRAVELLING TO OR FROM ANY OF THE SITES LISTED IN SCHEDULE 2 OF THE CLAIM FORM)

(7) 34 OTHER NAMED DEFENDANTS LISTED AT SCHEDULE 1 OF THIS ORDER

Defendants

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 TO 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 hearing of the Claimants' Claim for final injunctive relief against the named Defendants, and a continuation of the injunction Order against Persons Unknown

AND UPON all of the named Defendants other that the Fortieth Defendant settling the proceedings by giving undertakings to the Court

AND UPON hearing Counsel for the Claimants, Caroline Bolton and Natalie Pratt, without any attendance by or on behalf of the remaining Fortieth Defendant or Persons Unknown

AND UPON the Court reading the application and the witness statements listed in Schedule A

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 sought does not prohibit peaceful protest

AND UPON the Court considering its discretion to grant injunctive relief pursuant to s.37(1) Senior Courts Act 1981 and considering it just and convenient to do so

IT IS ORDERED THAT:

Definitions

1. For the purpose of this Order:

    1.1 **"The Roads"** shall mean the Roads identified in Annexe 1A, 2A, 3A, 4A to this Order and to the Claim Form, as marked in purple on the maps at Annexes 1A, 2A, 3A, and 4A to this Order and to the Claim Form.

    1.2 "**The Aylesbury Site**" shall mean Arla Foods Limited's site at Aylesbury Dairy, Samian Way, Aston Clinton, Aylesbury HP22 5EZ, as marked in red on the plans at Annexe 1 to this Order and to the Claim Form ("**the Aylesbury Site Plan**").

    1.3 "**The Oakthorpe Site**" shall mean Arla Foods Limited's site at Oakthorpe Dairy, Chequers Way, Palmers Green, London N13 6BU, as marked in red on the plans at Annexe 2 to this Order and to the Claim Form ("**the Oakthorpe Site Plan**").

    1.4 "**The Hatfield Site**" shall mean Arla Foods Hatfield Limited's site at Hatfield Distribution Warehouse, 4000 Mosquito Way, Hatfield Business Park, Hatfield, Hertfordshire AL10 9US, as marked in red on the plans at Annexe 3 to this Order and to the Claim Form ("**the Hatfield Site Plan**").

    1.5 "**The Stourton Site**" shall mean Arla Foods Limited's Dairy at Pontefract Road, Leeds LS10 1AX and National Distribution Centre at Leodis Way, Leeds LS10 1NN as marked in red on the plans at Annexe 4 to this Order and to the Claim Form ("**the Stourton Site Plan**").

INJUNCTION

Prohibitions

2. Until and including 26 July 2029, the **First to Sixth Defendants (Persons Unknown)** and the **Fortieth Defendant** and each of them (whether by themselves or by instructing, encouraging or allowing any other person), are forbidden from:

2.1 Entering into, entering onto, tunnelling under or remaining on the following Sites:

(i) **The Aylesbury Site** as marked in red on the attached **Aylesbury Site Plan** at Annexe 1;

(ii) **The Oakthorpe Site** as marked in red on the attached **Oakthorpe Site Plan** at Annexe 2;

(iii) **The Hatfield Site** as marked in red on the attached **Hatfield Site Plan** at Annexe 3;

(iv) **The Stourton Site** as marked in red on the attached **Stourton Site Plan** at Annexe 4.

2.2 Blocking, slowing down, obstructing or otherwise interfering with vehicular access to or from the highway at the following sites:

(i) **The Aylesbury Site** as marked in red on the attached **Aylesbury Site Plan** at Annexe 1;

(ii) **The Oakthorpe Site** as marked in red on the attached **Oakthorpe Site Plan** at Annexe 2;

(iii) **The Hatfield Site** as marked in red on the attached **Hatfield Site Plan** at Annexe 3; and

(iv) **The Stourton Site** as marked in red on the attached **Stourton Site Plan** at Annexe 4.

2.3 Approaching, slowing down, or obstructing any vehicle on or moving along or accessing **the Roads** identified in Annexes 1A, 2A, 3A, 4A to this Order for the purpose of:

(i) disrupting vehicular access to or from **The Aylesbury Site**, **The Oakthorpe Site**, **The Hatfield Site**, and/or **The Stourton Site**; and

(ii) protesting.

2.4 Entering, climbing onto, climbing into, or climbing under any vehicle travelling to or from **The Aylesbury Site**, **The Oakthorpe Site**, **The Hatfield Site**, and/or **The Stourton Site**:

(i) for the purpose of protesting; and

(ii) and without the permission of the registered keeper of the vehicle.

2.5 Affixing themselves ("locking on") to any vehicle on, entering or exiting **The Aylesbury Site**, **The Oakthorpe Site**, **The Hatfield Site**, and/or **The Stourton Site** where the "locking on" is for the purpose of protesting.

2.6 Affixing themselves ("locking on") or any other items to any of **the Roads** or any other person or object on, under or over **the Roads** for the purpose of:

(i) disrupting vehicular access to or from **The Aylesbury Site**, **The Oakthorpe Site**, **The Hatfield Site**, and/or **The Stourton Site**; and

(ii) protesting.

2.7 Erecting any structure on **the Roads** for the purpose of:

(i) disrupting vehicular access to or from Arla Foods Limited at **The Aylesbury Site**, **The Oakthorpe Site**, **The Hatfield Site**, and/or **The Stourton Site**; and

(ii) protesting.

Alternative service

3. Pursuant to CPR rules 6.15 and 6.27, the Claimants have permission, in addition to personal service, or in the alternative to personal service, to serve the **First to Sixth Defendants (Persons Unknown)** and the **Fortieth Defendant** with this Order and any further documents in the Claim by **all** of the following methods (with paragraph 3.1 to 3.5 to be treated conjunctively):

3.1 **Websites:** placing a web link on the First Claimant's website and Facebook page at which a copy of the re-Amended Claim Form, Application(s) for an Interim Injunction, the supporting documents relied on in this Claim, and this Order can be accessed; and

3.2 **Email:** sending a copy of this Order to Animal Rebellion and Extinction Rebellion at the following email addresses:

actions@animalrebellion.org; fundraising@animalrebellion.org; integration@animalrebellion.org; talks@animalrebellion.org; global@animalrebellion.org; localgroups@animalrebellion.org; media@animalrebellion.org; pressoffice@animalrebellion.org; finance@animalrebellion.org; governance@animalrebellion.org; techsupport@animalrebellion.org; press@extinctionrebellion.uk; AnimalRisingLegal@protonmail.com.

and providing a web link at which they can access documents relied on in this Claim and this Order; and

3.3 **Post:** where an address of a named Defendant is known to the Claimants, by posting a copy of this Order together with a covering letter through the letterbox of the named Defendant's address (or by leaving in a separate mailbox) with a notice affixed to the front door if necessary, drawing the recipient's attention to the fact that the package contains a court order. If the premises do not have a letterbox, or mailbox, or the package will not fit through the letterbox, a package may be left next to the front door and a notice containing this Order may be affixed to the front door marked with a notice drawing the recipient's attention to the fact that the package contains a court order and should be read urgently. The notices shall be given in the form set out in Schedule 2 to this Order; and

3.4 **Text messages:** sending a text message to any named Defendant for whom the Claimants have a mobile telephone number, notifying them that an injunction order has been granted against them and providing a web link at which the Defendant can access the re-Amended Claim Form, Application(s) for an Interim Injunction, the supporting documents relied on in this Claim, and this Order. The notice shall be given in the form set out in Schedule 2 to this Order; and

3.5 **Placing signs and/or notices:** on the perimeter of **The Aylesbury Site**, **The Oakthorpe Site**, **The Hatfield Site**, and **The Stourton Site** providing a web link and/or QR code at which the Amended Claim Form, Application(s) for an Interim Injunction, the supporting documents relied on in this Claim, and this Order can be found; **OR**

3.6 **Where requested:** the re-Amended Claim Form, Application(s) for an Interim Injunction, the supporting documents relied on in this Claim, and this Order may be served by email where the Defendant has requested that they be served by email and by sending the email to the address provided by the Defendant; **OR**

3.7 **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.

FURTHER DIRECTIONS

Liberty to apply

5. The First to Sixth Defendants or any person other than the named Defendants may each of them apply to the Court on 48 hours prior written notice (not to include weekends or public holidays) to both the Court and the Claimants to vary or discharge this Order (or so much of it as affects that person).

6. Any person applying to vary or discharge this order must provide their full name and address for service.

Review of this Order

7. The Order against the **First to Sixth Defendants (Persons Unknown)** shall be reviewed at a hearing no later than **24 July 2025** (or as near to that date as the court can reasonably accommodate), with a time estimate of one day, unless the Claimants indicate to the Court that they do not seek an extension of the Order, upon which the Order will expire as against Persons Unknown only. The Claimants must file and serve in accordance with paragraph 3 above any evidence upon which they intend to rely at the review hearing by 4pm on 10 July 2025. Any other person who would like to participate in the review hearing must also file and serve on the Claimants any evidence upon which they intend to rely at the review hearing by 4pm on 10 July 2025.

Costs

8. No Order as to costs.

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 '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 A-Witness Statements;
   (ii) Schedule 1-List of Named Defendants;
   (iii) Schedule 2-Notices;
   (iv) Annex 1 the plan of the Aylesbury Site;
   (v) Annex 2 the plan of the Oakthorpe Site;
   (vi) Annex 3 the plan of the Hatfield Site;
   (vii) Annex 4 the plan of the Stourton Site;
   (viii) Annexe 1A, 2A, 3A, and 4A-The List of "The Roads".

Communications with the Court

6. All communications with the Court about this Order should be sent to the Rolls Building at 7 Rolls Buildings, Fetter Lane, London, EC4A 1NL. The telephone number is 020 79476690. The Email address is ChanceryJudgesListing@justice.gov.uk. The offices are open between 10am and 4pm Monday to Friday.

SCHEDULE A-WITNESS STATEMENTS

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

   i. Joanne Taylor;
   ii. Melanie Savage (first and second witness statements);
   iii. David Dons;
   iv. Anne-Frances Ball;
   v. Afshin Amirahmadi;
   vi. Nicholas McQueen (first to eleventh witness statements, inclusive);
   vii. Samantha Sage;
   viii. James Damarell.

Service of this Order

This Order will be served by the Claimants on the Defendants. The Court has provided a sealed copy of this order to the Claimants' legal representative, Walker Morris at email nick.mcqueen@walkermorris.co.uk

SCHEDULE 1-NAMED DEFENDANTS

Defendant No.	
7	Xanthe Wells
8	Stephen Bone
9	Kim Wainwright
10	Bryan Mongelli
11	Nikola Muratova
12	Radim Sandr
13	Robert King-Houston
14	Vojtech Palencar
15	Jan Kratky
16	Anna Wilkinson
17	Lucia Bree Alexander
18	Rueben Lemer
19	Solene Rashleigh
20	Cristina Acosta
21	Sined Singhage
22	Vaclav Opatril
23	Cathy Eastburn
24	Marina Ballestra Candel
25	Hamish Gardner
26	Euphemia Smith
27	Dev Vyas
28	Vita Sleigh
29	Gabriella Ditton
30	Robert Smith
31	Emily Camp
32	Gemma Barnes
33	Marcus Decker
34	Robert Allan
35	Theresa Higginson
36	Rachel Steele
37	Alexander Bourke
38	Rosa Sharkey
39	Rik Jansen
40	Person identified in image 1 at Schedule 1A to the re-Amended Claim Form

SCHEDULE 2-NOTICES

On the package containing this Order:

"VERY URGENT: THIS PACKAGE CONTAINS AN ORDER OF THE HIGH COURT AND YOU SHOULD READ IT IMMEDIATELY AND SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE DOWNLOAD IT FROM https://www.walkermorris.co.uk/arla-injunction/ OR CALL 0113 283 2500"

to affix to the front door when the package has been posted through the letterbox or placed in a mailbox:

"VERY URGENT: A PACKAGE HAS BEEN LEFT THAT CONTAINS AN ORDER OF THE HIGH COURT AND YOU SHOULD READ IT IMMEDIATELY AND SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE DOWLOAD IT FROM https://www.walkermorris.co.uk/arla-injunction/ OR CALL 0113 283 2500"

For service by text message:

"VERY URGENT: A HIGH COURT INJUNCTION ORDER HAS BEEN MADE AGAINST YOU, THE LINK PROVIDED IN THIS TEXT MESSAGE CONTAINS AN ORDER OF THE HIGH COURT AND THE SUPPORTING DOCUMENTS RELIED UPON BY THE CLAIMANTS. YOU SHOULD IMMEDIATELY SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE CALL 0113 283 2500"

ANNEXE 1
THE AYLESBURY SITE

ANNEXE 1A
ROADS AT THE AYLESBURY SITE

1. SAMIAN WAY
2. COLLEGE ROAD NORTH
3. MODEL ROW

Google
100%
Imagery date: 6/13/21—newer
A41
A41
A41
A41
Samian Wy
Samian Wy
Samian Wy
Samian Wy
200 m
Camera: 1,284 m 51°48'44"N 0°43'16"W
95 m
3D

ANNEXE 2
THE OAKTHORPE SITE

ANNEXE 2A
ROADS AT THE OAKTHORPE SITE

1. OSTLIFFE ROAD
2. CHEQUERS WAY
3. OWEN ROAD
4. MITCHELL ROAD

Pymmes Brook
N Circular Rd
A406
Pymmes Brook
Pymmes Brook
Pymmes Brook
Pymmes Brook
N Circular Rd
A406
N Circular Rd
A406
N Circular Rd
A406
N Circular Rd
A406
N Circular Rd
A406
Google

ANNEXE 3
THE HATFIELD SITE

ANNEXE 3A
ROADS AT THE HATFIELD SITE

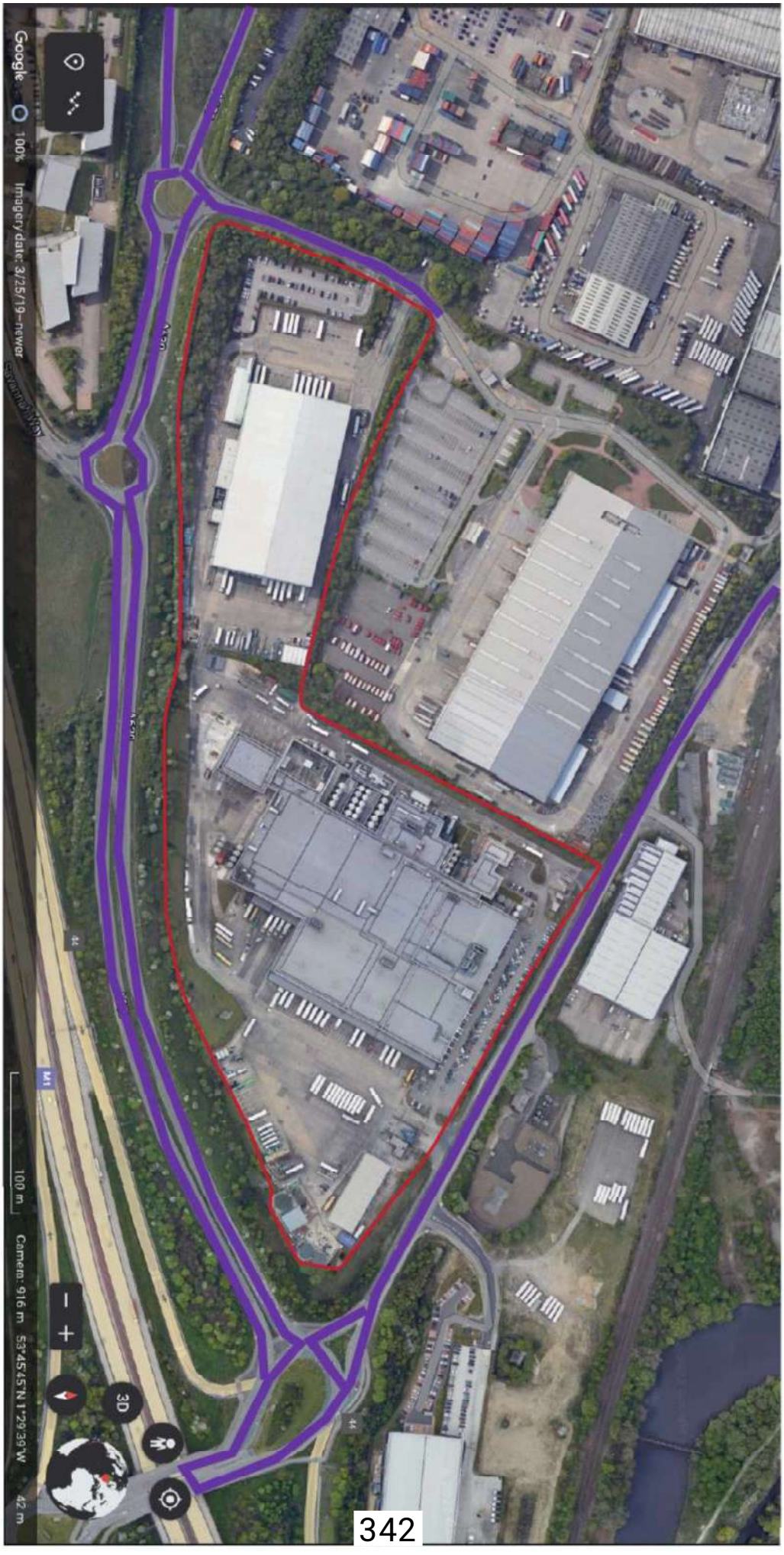
1. HATFIELD AVENUE
2. GYSPY MOTH AVENUE
3. MOSQUITO WAY

Google
100%
Imagery date: 6/13/21 - newer
Salisbury Hall Dr
Frobisher Way
Hearle Wy
Mosquito Way
Manor Rd
Manor Ct
Green Lanes
A1(M)
Cherwood Ave
Talbot Rd
Heathcote Ave
Burtonwood Cl
Wellfield Rd
3D
200 m
Camera: 1,323 m 51°46'06"N 0°13'59"W
79 m

ANNEXE 4
THE STOURTON SITE

ANNEXE 4A
ROADS AT THE STOURTON SITE

1. A639
2. PONTEFRACT ROAD
3. LEODIS WAY


Google
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100 m
Camera: 916 m 53°45'15"N 1°29'39"W
42 m
3D
M1
A639
A639
44
44

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Claim No. QB-2022-001317

In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)

Before the Honourable Mr Justice Julian Knowles
12 July 2024

B E T W E E N :

(1) THURROCK COUNCIL

(2) ESSEX COUNTY COUNCIL

QB-2022-001317

Claimants

-and-

(1) MADELINE ADAMS

(2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

(223) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM

(224) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO ANY VEHICLE TRAVELLING ON TO, OFF, ALONG OR WHICH IS ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM

(225) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO, INTO OR OFF ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)

(226) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR ITS

FORECOURT WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(227) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)

(228) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(229) PERSONS UNKNOWN WHO ARE TRESPASSING ON, UNDER OR ADJACENT TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY UNDERTAKING EXCAVATIONS, DIGGING, DRILLING AND/OR TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY AUTHORITY

(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

Defendants

ORDER

PENAL NOTICE

IF YOU, PERSONS UNKNOWN, 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 TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED

POWER OF ARREST

THIS ORDER CONTAINS A POWER OF ARREST ATTACHED AT SCHEDULE 2 OF THIS ORDER FOR BREACH OF PARAGRAPHS 2.1 TO 2.16 OF THIS ORDER PURSUANT TO SECTION 27 OF THE POLICE AND JUSTICE ACT 2006. ANY PERSON CAUGHT BREACHING PARAGRAPHS 2.1 TO 2.16 OF THIS ORDER MAY BE ARRESTED AND BROUGHT BEFORE THE COURT

UPON the review of the injunction Order granted by Foster J and dated 26 January 2023 insofar as it applies to Persons Unknown (only)

AND UPON hearing Caroline Bolton and Natalie Pratt of counsel and no person appearing for or on behalf of the Defendants

IT IS ORDERED THAT:

Definitions

1. For the purpose of this Order:

   1.1 "The Roads" shall mean the Roads identified in Annexe 1 to this Order and to the Claim Form as marked in red on the maps at Annexes 2 and 3 to this Order and to the Claim Form.

   1.2 "The Administrative Area of Thurrock" shall mean the administrative area as marked with the purple line on the map at Annexe 2 to this Order and to the Claim Form.

   1.3 "The Administrative Area of Essex" shall mean the administrative area as marked with the pink line on the map at Annexe 3 to this Order and to the Claim Form.

   1.4 "The Administrative areas of Thurrock and Essex" shall mean those areas in 1.2 and 1.3 above.

   1.5 "The Fuel Terminals" shall refer to the following four sites collectively:

      1.5.1 The Navigator Fuel Terminal, Oliver Road, West Thurrock RM20 3ED;

      1.5.2 The Esso Fuel Terminal, London Road, Purfleet RM19 1RS;

      1.5.3 Exolum Storage Ltd, off Askews Farm Lane, London Road, Grays RM17 5YZ; and

      1.5.4 Oikos Storage Limited, Haven Road, Hole Haven Wharf, Canvey Island, Essex SS8 0NR.

INJUNCTION

Prohibitions

2. Until and including **12 July 2029**, and subject to paragraph 6 below, the **223rd to 229th Defendants (Persons Unknown)** (whether by themselves or by instructing, encouraging or allowing any other person) are forbidden from:

2.1 Blocking, slowing down, endangering, obstructing or otherwise interfering with the flow of traffic onto or along or off **the Roads** for the purpose of protesting.

2.2 Blocking, slowing down, endangering, obstructing or otherwise interfering with **access to or from the Roads**, and on any adjacent roads, slip roads or roundabouts which are not vested in the Claimants, for the purpose of protesting.

2.3 Entering, climbing onto, climbing into, climbing under **any vehicle** travelling on to, off or along **the Roads** or accessing or exiting the Roads: (a) without the permission of the registered keeper of the vehicle; and (b) for the purpose of protesting.

2.4 Entering, climbing onto, climbing into, climbing under **any vehicle** on any **adjacent roads, slip roads or roundabouts to the Roads,** whether or not those roads are vested in the Claimants: (a) without the permission of the registered keeper of the vehicle; and (b) for the purpose of protesting.

2.5 **Affixing themselves** ("locking on") to any vehicle travelling on to, off or along the Roads or accessing or exiting the Roads.

2.6 Affixing themselves ("locking on") to any vehicle on any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants, where the "locking on" is for the purpose of protesting.

2.7 Affixing themselves ("locking on") or any other items to any of the Roads or any other person or object on, under or over the Roads.

2.8 Affixing themselves ("locking on") or any other items to any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants where the "locking on" is for the purpose of protesting.

2.9 **Erecting any structure** on the Roads.

2.10 **Tunnelling**, excavating, drilling or digging under or adjacent to the Roads.

2.11 **Occupying** existing tunnels under the Roads for the purpose of protesting.

2.12 **Causing damage** to the surface of or to any apparatus on or adjacent to the Roads or any vehicle on the Roads for the purpose of protesting.

2.13 **Abandoning any vehicle** or item on any Roads, adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants for the purpose of protesting.

2.14 Blocking, slowing down, obstructing or otherwise interfering with vehicular access to **any petrol station** in the administrative areas of Thurrock and Essex for the purpose of protesting.

2.15 Blocking, endangering, slowing down, obstructing or otherwise interfering with vehicular access to any **petrol station forecourt or access road**, in the administrative areas of Thurrock and Essex for the purpose of protesting.

2.16 Blocking, endangering, slowing down, obstructing or otherwise interfering with the offloading by **delivery tankers of fuel supplies** and/or the refuelling of vehicles at any petrol station within the administrative areas of Thurrock and Essex.

2.17 **Causing, assisting** or encouraging any other person to do any act prohibited by paragraphs 2.1 to 2.16 above.

2.18 **Continuing any acts** prohibited by paragraphs 2.1 to 2.16 above.

Power of arrest

3. Pursuant to s.27 Police and Justice Act 2006, a power of arrest shall apply to paragraphs 2.1 to 2.16 above in the form attached at Schedule 2 of this Order.

Alternative service

4. Pursuant to CPR rules 6.15 and 6.27, the Claimants shall have permission to serve the **223rd to 229th Defendants (Persons Unknown)** with this Order, the power of arrest and any further documents in the Claim by (4.1 – 4.3 to be treated conjunctively):

4.1 **Websites:** placing a copy of the documents to be served on the Claimants' websites and Facebook pages; and

4.2 **Email:** sending a copy of the documents to be served to Just Stop Oil, Youth Climate Swarm, Extinction Rebellion and Insulate Britain at the following email addresses: juststopoilpress@protonmail.com; youthclimateswarm@protonmail.com; press@extinctionrebellion.uk; insulatebritainpress@protonmail.com

and providing a web link at which they can access the documents to be served; and

4.3 **Placing signs:** on A-Road entry points and exit points to the administrative area of Thurrock, and within 50 metres of The Fuel Terminals and on the A130 and B1014 between the entrance to Canvey Island and the roundabout known as the Waterside Road roundabout on Canvey Island, stating that there is a High Court

Injunction in place prohibiting protest on the highway and providing a web link and QR code at which the documents to be served can be found.

5. The **deemed date of service** of any documents referred to in paragraph 4 above shall be the day on which service of the document or documents is completed in accordance with paragraph 4 above.

Review of this Order

6. The Order against the **223rd to 229th Defendants (Persons Unknown)** shall be reviewed at a hearing no later than **11 July 2025** (and as near to that date as the court can reasonably accommodate), with a time estimate of one day, unless the Claimants indicate to the Court that they do not seek an extension of the Order, upon which the Order will expire. The Claimants must file and serve in accordance with paragraph 4 above any evidence upon which they intend to rely at the review hearing by 4pm on 27 June 2025. Any other person who would like to participate in the review hearing must also file and serve on the Claimants any evidence upon which they intend to rely at the review hearing by 4pm on 27 June 2025.

Liberty to apply

7. The Defendants or any other person affected by this order may apply to the Court at any time to vary or discharge it, but if they wish to do so they must inform the Claimants' solicitors at the same time as the application is filed at court (and in any event not less than 48 hours before the hearing of any such application, not to include weekends or public holidays).

8. Any person applying to vary or discharge this order must provide their full name and address for service.

Costs

9. No order as to costs.

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 '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 A-Witness Statements;
   (ii) Schedule 1-List of Named Defendants;
   (iii) Schedule 2-The Power of Arrest;
   (iv) Annexe 1-The List of "The Roads" in Thurrock;
   (v) Annexe 2-The map of the Administrative Area of Thurrock; and
   (vi) Annexe 3-The map of the Administrative Area of Essex.

Communications with the Court

6. All communications with the Court about this Order should be sent to Room E03, The 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.

SCHEDULE A-WITNESS STATEMENTS

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

   (a) The witness statement of Adewale Adesina 23.4.2022;
   (b) The witness statement of Morgan Cronin 23.4.2022;
   (c) The witness statement of Paul Crick 23.4.2022;
   (d) The first witness statement of Adam Rulewski 24.4.2022;
   (e) The second witness statement of Adam Rulewski dated 11.5.2022;
   (f) The third witness statement of Adam Rulewski dated 16.5.2022;
   (g) The fourth witness statement of Adam Rulewski dated 25.1.2023;
   (h) The second witness statement of Adewale Adesina 20.3.2024;
   (i) The witness statement of Stephen Jennings 23.3.2024;
   (j) The third witness statement of Adewale Adesina 26.6.2024;
   (k) The fifth witness statement of Adam Rulewski 11.7.2024.

SCHEDULE 1 – NAMED DEFENDANTS

1. Madeline Adams
2. Mary Adams
3. David Addy
4. Amber Alexandar
5. Mina-Mae Alexander
6. Eric Anderson
7. Christine Aslett
8. Nicholas Aslett
9. Lachlan Ayles
10. Stephanie Aylett
11. Pete Bailey
12. William Bajwa
13. Jeremy Banks
14. Colin Barrington
15. Kai Bartlett
16. Joshua Bates
17. Christopher Bennett
18. Gillian Bird
19. John Blanco
20. John Blewett
21. Poppy Bliss
22. Hilary Bond
23. Trevor Boulden
24. Geoffroy Bowman
25. Simon Bramwell
26. Joseph Bream
27. Scott Breen
28. Stephen Brett
29. Emily Brocklebank
30. Claire Brook
31. Emma Brooker
32. Michael Brown
33. Judith Bruce
34. Madeleine Budd
35. Tes Burns
36. Benjamin Buse
37. Catherine Cannon
38. Rebecca Cassar
39. Jessica Causby
40. Susan Chamberlayne
41. Sally Chapman
42. Vishal Chauhan
43. Katherine Chesterman
44. Phillipa Clarke
45. Oliver Clegg
46. Orla Coghlan
47. John Coghlan
48. Ruth Cook

49. Heather Cooper
50. Jasmine Corkhill Harris
51. Joy Susan Corrigan
52. Richard Crane
53. David Crawford
54. Rosemary Croft
55. Joseph Daldorph
56. Beverley Ann Daniel
57. Ben Delap
58. Gaie Delap
59. Gabriella Ditton
60. Igors Djomins
61. Laura Doehlei
62. Marguerite Doubleday
63. Ella Eason
64. Christine Essex
65. Janet Flynn
66. Michael Forton
67. Phoebe Frewer
68. Amy Friel
69. Robin Gardner
70. Cressida Gething
71. Alasdair Gibson
72. Hugo Glashier
73. Stephanie Golder
74. William Goldring
~~75. Xavier Gonzalez Trimmer~~
76. Alfie Goodland
77. Emma-Rose Goodwin
78. Sophie Greenland
79. Aaron Gunning
80. Louisa Hadden
81. Catherine Hallett
82. Finn Halsall
83. Jake Handling
84. Gareth Harper
85. Louise Harris
86. Patrick Hart
87. Yvonne Hayward
88. Selma Heimedinger
89. Jonathan Herbert
90. Noah Herfort
91. Suzanne Hetherington
92. Sarah Hirons
93. Rupert Horlick
94. Adrian Howlett
95. Eric Hoyland
96. Abigail Hubbucks
97. Hannah Hunt
98. Emma Ireland

99. Pavel Ivanov
100. Rik Jansen
101. Ruth Jarman
102. Stephen Jarvis
103. Russell Jarvis
104. John Johnson
105. Hannah Johnston
106. Timothy Jones
107. Pascale Kann
108. Hallum Kelly
109. Linda Latter
110. Charles Laurie
111. Peter Lay
112. Eben Lazarus
113. Isobel Lewis
114. Elanor Lewis-Holmes
115. Joseph Linheart
116. El Litten
117. Rebecca Lockyer
118. Felix Lozano
119. Barbara Lund
120. Jacqueline Macey
121. Catharine Maclean
122. Jacob Main
123. Elizabeth McCormack
124. Eilidh McFadden
125. Nathan McGovern
126. Louis McKechnie
127. Lilah McKim
128. Grace McMeekin
129. Adalaide Meaney
130. Anna Middleton
131. Hannah Miles
132. Benjamin Mitchell
133. Darcy Mitchell
134. Deborah Mitchell
135. Teddy Monroe
136. Fiona Moore
137. Stefania Morosi
138. Paul Morozzo
139. Virgenia Morris
140. Paul Morrison
141. Zak Mullen
142. Alexandra Mulvey
143. Reuben Mychaleckyj
144. Richard Newell-Price
145. Ben Newman
146. Alexander Newnham
147. Jessica Norgard
148. Rachel Norris

149. Rose Norris
150. George Oakenfold
151. Nicholas Onley
152. Jakub Pabiniak
153. Ella-Rose Paez
154. Sophie Page-Hall
155. Susan Parfitt
156. Dillon Parsons
157. Rose Patterson
158. Ethan Paul
159. Rosalind Pears
160. Abigail Percy-Ratcliff
161. Ursula Pethick
162. Jacqueline Phillips
163. Mitchel Phillips-White
164. Robert Possnett
165. Matthew Powell
166. Emily Price
167. Robert Price
168. Amy Pritchard
169. Felix Reeves-Whymark
170. Anna Retallack
171. Anne Richards
172. Bethan Roberts
173. Jasmin Robertson
174. Sebastian Roblyn
175. Isabel Rock
176. Elizabeth Rosser
177. Christian Rowe
178. Finn Roweth
179. Adelheid Russenberger
180. Isla Sandford
181. Daniel Sargison
182. James Sargison
183. Cat Scothorne
184. James Sebley
185. Rosa Sharkey
186. Sophie Sharples
187. Susan Sidey
188. James Skeet
189. Hannah Skwarska
190. Jacqueline Slade
191. Oliver Slaughter
192. David Smartknight
193. Heather Smith
194. Joshua Smyth
195. David Squire
196. Katherine Steer
197. Oliver Stevens
198. Madeleine Stewart

199. Ferdi Suleyman
200. Vivien Talbot
201. Ben Taylor
202. Jacqueline Teggin
203. Zachary Tenquist
204. David Thorneywork
205. Hannah Torrance-Bright
206. Lucy Trinder
207. Morgan Trowland
208. Jan Van Der Knapp
209. Rik Venhoutteghem
210. Sally Webber
211. Leonard Weber
212. Miranda Whelehan
213. Philip White
214. Edred Whittingham
215. Alexander Wilcox
216. Clare Wilson
217. Thomas Winter
218. Carol-Ann Wood
219. Lizia Woolf
220. Amorel Kennedy
221. Grace Lally
222. Morien Morgan
230. Alice Wharrie
231. Anne Hart
232. Anthony Whitehouse
233. Callum Goode
234. Caroline Cattermole
235. [Not used]
236. Christopher Hardy
237. David Nixon
238. Isabel Walters
239. Jade Calland
240. Jane Touil
241. Joe Howlett
242. John Jordan
243. Jonathan Coleman
244. Judy Judkins
245. Karan Wildin
246. Kayleigh Matthews
247. Larch Maxey
248. Lindsay Hart
249. Margaret Reid
250. Mia Powell
251. Phoebe Plummer
252. Sam Parry Holland
253. Samuel Johnson
254. Sarah MacDonald
255. Seiriol Davies

256. Simon Reding
257. Stephen Gingell
258. Suzie Webb
259. Victoria Lindsell
260. Wendy Cocks
261. Diana Martin
262. Tony Muir

SCHEDULE 2 – POWER OF ARREST

N110A

Power of arrest

Name of court	Claim No.
High Court of Justice King's Bench Division	QB-2022-001317
Claimant's name (including ref.) (1) Thurrock Council (2) Essex County Council	
Defendant's name (including ref.) (223)-(229) Persons Unknown	

Name of defendant

(1) Madeline Adams
(2)-(222) Other Named Defendants

Defendant's address

See attached continuation sheet

Seal

HIGH COURT OF JUSTICE
17 JUL 2024
QUEEN'S BENCH DIVISION

Date order made 12/07/2024 Name of judge Mr Justice Julian Knowles

Order made under (insert statutory provision) Local Government Act 1972, s222 and Highways Act 1980, s130(5)

This order includes a power of arrest under (insert statutory provision)

Police and Justice Act 2006, s27

The relevant paragraphs of the order to which a power of arrest has been attached are:
(set out those paragraphs of the order to which the power of arrest is attached, if necessary continue on a separate sheet)

Paragraphs 2.1 to 2.16 of the Order of Mr Justice Julian Knowles dated 12 July 2024 (see attached continuation sheet)

This power of arrest was ordered on 12/07/2024 **and expires on the** 11/07/2029

Note to Arresting Officer

Where the defendant is arrested under the power given by section 155 of the Housing Act 1996, or section 27 of the Police and Justice Act 2006; or section 43 of the Policing and Crime Act 2009; or section 4 of the Anti-Social Behaviour, Crime and Policing Act 2014:-

- the defendant shall be brought before the judge within the period of 24 hours beginning at the time of their arrest;
- a constable shall inform the person on whose application the injunction was granted, forthwith where the defendant is arrested under the power given by section 155 of the Housing Act 1996 or as soon as reasonably practicable where the defendant is arrested under the power given by section 27 of the Police and Justice Act 2006 or section 43 of the Policing and Crime Act 2009 or section 4 of the Anti-Social Behaviour, Crime and Policing Act 2014.

Nothing in section 155 of the Housing Act 1996 or section 27 of the Police and Justice Act 2006 or section 43 of the Policing and Crime Act 2009 or section 4 of the Anti-Social Behaviour, Crime and Policing Act 2014, shall authorise the detention of the respondent after the expiry of the period of 24 hours beginning at the time of their arrest.

In calculating any period of 24 hours, no account shall be taken of Christmas Day, Good Friday or any Sunday.

Name of Claimant

(1) Thurrock Council
(2) Essex Council

Claimant's address

Sharpe Pritchard LLP
Elm Yard
10-16 Elm Street
London
WC1X 0BJ

Claimant's phone number

020 7405 4600

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IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Claim No. QB-2022-001317

In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)

Before the Honourable Mr Justice Julian Knowles
12 July 2024

B E T W E E N :

(1) THURROCK COUNCIL

(2) ESSEX COUNTY COUNCIL

Claimants

-and-

(1) MADELINE ADAMS

(2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

(223) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM

(224) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO ANY VEHICLE TRAVELLING ON TO, OFF, ALONG OR WHICH IS ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM

(225) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO, INTO OR OFF ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)

(226) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR ITS

FORECOURT WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(227) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)

(228) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(229) PERSONS UNKNOWN WHO ARE TRESPASSING ON, UNDER OR ADJACENT TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY UNDERTAKING EXCAVATIONS, DIGGING, DRILLING AND/OR TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY AUTHORITY

(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

Defendants

POWER OF ARREST: CONTINUATION SHEET

DEFENDANTS

PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM	223
PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO ANY VEHICLE TRAVELLING ON TO, OFF, ALONG OR WHICH IS ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM	224
PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN,	225

OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO, INTO OR OFF ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)	
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PERSONS UNKNOWN WHO ARE TRESPASSING ON, UNDER OR ADJACENT TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY UNDERTAKING EXCAVATIONS, DIGGING, DRILLING AND/OR TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY AUTHORITY	229

THE RELEVANT PARAGRAPHS OF THE ORDER TO WHICH A POWER OF ARREST HAVE BEEN ATTACHED ARE:

Paragraphs 2.1 to 2.16 of the Order of Mr Justice Julian Knowles dated 12 July 2024:

2. The Defendants and each of them (whether by themselves or by instructing, encouraging or allowing any other person) are forbidden from:

2.1 Blocking, slowing down, endangering, obstructing or otherwise interfering with the flow of traffic onto or along or off the Roads for the purpose of protesting.

2.2 Blocking, slowing down, endangering, obstructing or otherwise interfering with access to or from the Roads, and on any adjacent roads, slip roads or roundabouts which are not vested in the Claimants, for the purpose of protesting.

2.3 Entering, climbing onto, climbing into, climbing under any vehicle travelling on to, off or along the Roads or accessing or exiting the Roads: (a) without the permission of the registered keeper of the vehicle; and (b) for the purpose of protesting.

2.4 Entering, climbing onto, climbing into, climbing under any vehicle on any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested

in the Claimants: (a) without the permission of the registered keeper of the vehicle; and (b) for the purpose of protesting.

2.5 Affixing themselves ("locking on") to any vehicle travelling on to, off or along the Roads or accessing or exiting the Roads.

2.6 Affixing themselves ("locking on") to any vehicle on any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants, where the "locking on" is for the purpose of protesting.

2.7 Affixing themselves ("locking on") or any other items to any of the Roads or any other person or object on, under or over the Roads.

2.8 Affixing themselves ("locking on") or any other items to any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants where the "locking on" is for the purpose of protesting.

2.9 Erecting any structure on the Roads.

2.10 Tunnelling, excavating, drilling or digging under or adjacent to the Roads.

2.11 Occupying existing tunnels under the Roads for the purpose of protesting.

2.12 Causing damage to the surface of or to any apparatus on or adjacent to the Roads or any vehicle on the Roads for the purpose of protesting.

2.13 Abandoning any vehicle or item on any Roads, adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants for the purpose of protesting.

2.14 Blocking, slowing down, obstructing or otherwise interfering with vehicular access to any petrol station in the administrative areas of Thurrock and Essex for the purpose of protesting.

2.15 Blocking, endangering, slowing down, obstructing or otherwise interfering with vehicular access to any petrol station forecourt or access road, in the administrative areas of Thurrock and Essex for the purpose of protesting.

2.16 Blocking, endangering, slowing down, obstructing or otherwise interfering with the offloading by delivery tankers of fuel supplies and/or the refuelling of vehicles at any petrol station within the administrative areas of Thurrock and Essex.

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Claim No. QB-2022-001317

In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)

Before the Honourable Mr Justice Julian Knowles
12 July 2024

B E T W E E N :

(1) THURROCK COUNCIL

(2) ESSEX COUNTY COUNCIL

Claimants

-and-

(1) MADELINE ADAMS

(2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

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(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

Defendants

ANNEXE 1

Thurrock Council Roads

NORTH ROAD	B186
SANDY LANE	B1335
ROMFORD ROAD ROUNDABOUT	B1335
MILL ROAD	C Class
PURFLEET ROAD	C Class
WEST ROAD	C Class
ARISDALE AVENUE	C Class
DAIGLEN DRIVE	C Class
STIFFORD ROAD	B1335
LANCE CORPORAL NICKY MASON WAY	B1335
STIFFORD ROAD	B1335
ARTERIAL ROAD	A1306
THURROCK SERVICES ROAD	Unclassified
POND ROAD ROUNDABOUT	Unclassified

LONDON ROAD ROUNDABOUT	A1306
LONDON ROAD	A1306
ENTRY ON SLIP WELLINGTON INTERCHANGE TO A13 EASTBOUND	A13
EXIT OFF SLIP A13 TO WELLINGTON INTERCHANGE WESTBOUND	A13
PURFLEET BYPASS	B1335
LINK ROAD FROM A13 SOUTHBOUND TO A1306	A1090
CANTERBURY WAY SLIP ROAD ANTICLOCKWISE	A282
LINK ROAD FROM A1306 TO A13 NORTHBOUND	A282
CANTERBURY WAY SLIP ROAD CLOCKWISE	A282
STONEHOUSE CORNER ROUNDABOUT	A1090
ARTERIAL ROAD ROUNDABOUT	A1090
STONEHOUSE LANE	A1090
CYGNET VIEW	Unclassified
ARTERIAL ROAD ROUNDABOUT A1306	A1306
WEST THURROCK WAY RETAIL PARK ROUNDABOUT	B186
ARTERIAL ROAD	A1306
LAKE RISE	Unclassified
OLIVER CLOSE	A1090
ST CLEMENTS WAY ROUNDABOUT	A1090
ST CLEMENTS WAY	A1090
LONDON ROAD	A1090
WEST THURROCK WAY	A126
Access road Cost Co	Unclassified
JUNCTION 30 M25 TO BOROUGH BOUNDARY WESTBOUND	A13
BOROUGH BOUNDARY TO M25 JUNCTION 30 EASTBOUND	A13
ACCESS ROAD FROM BURGHLEY ROAD TO SUPERSTORE	Private Road
BURGHLEY ROAD ROUNDABOUT	B146
SEALLY ROAD	Unclassified
BURGHLEY ROAD	B146
PILGRIMS LANE ROUNDABOUT	A1306
ARTERIAL ROAD	A1306
ENTRY ON SLIP NORTH SLIFFORD ROUNDABOUT TO A13 EASTBOUND	A13
ENTRY ON SLIP NORTH STIFFORD ROUNDABOUT TO A13 WESTBOUND	A13
EXIT OFF SLIP A13 TO NORTH STIFFORD ROUNDABOUT WESTBOUND	A13
EXIT OFF SLIP A13 TO NORTH STIFFORD ROUNDABOUT EASTBOUND	A13
STIFFORD ROUNDABOUT	A1012
TREACLE MINE ROUNDABOUT	A1012
LINK FROM A1012 ROUNDABOUT TO A1306 INTERCHANGE	A1012
HOGG LANE	A1012
ELIZABETH ROAD	A1012
HOGG LANE ROUNDABOUT	A1012
LONDON ROAD	A126
HOGG LANE ROUNDABOUT	A1012
EASTERN WAY	A126

LAKESIDE INTERCHANGE TO NORTH STIFFORD ROUNDABOUT EASTBOUND	A13
NORTH STIFFORD ROUNDABOUT TO LAKESIDE INTERCHANGE WESTBOUND	A13
LAKESIDE INTERCHANGE TO M25 JUNCTION 30 WESTBOUND	A13
JUNCTION 30 M25 TO LAKESIDE INTERCHANGE EASTBOUND	A13
BRENTWOOD ROAD	A128
STANFORD ROAD	A1013
SOUTHEND ROAD	A1013
CEMENT BLOCK COTTAGES	Unclassified
DOCK ROAD	A126
ORSETT COCK ROUNDABOUT	A1013
ENTRY ON SLIP ORSETT COCK ROUNDABOUT TO A13 WESTBOUND	A13
EXIT OFF SLIP A13 EASTBOUND TO ORSETT COCK ROUNDABOUT	A13
EXIT OFF SLIP A13 WESTBOUND TO ORSETT COCK ROUNDABOUT	A13
DENEHOLES ROUNDABOUT	A1013
WOOD VIEW	B149
LODGE LANE	A1013
CHADWELL HILL	C Class
EXIT OFF SLIP A1089 TO A126 SOUTHBOUND	A1089
ENTRY ON SLIP A126 TO A1089 NORTHBOUND	A1089
MARSHFOOT ROAD ROUNDABOUT	A126
ST CHADS ROAD ROUNDABOUT	A126
GATEWAY ACADEMY ROUNDABOUT MARSHFOOT ROAD	A126
MARSHFOOT ROAD	A126
MARSHFOOT ROAD	A126
BROADWAY	A126
THURROCK PARK WAY	Unclassified
ACCESS ROADS FOR ASDA SUPPERSTORE	Unclassified
NORTH STIFFORD ROUNDABOUT TO A1089 EASTBOUND	A13
A1089 TO NORTH STIFFORD ROUNDABOUT WESTBOUND	A13
A1089 TO ORSETT COCK ROUNDABOUT EASTBOUND	A13
ORSETT COCK ROUNDABOUT TO A1089 WESTBOUND	A13
DOCK APPROACH ROAD	A1089
DOCK APPROACH ROAD	A1089
DOCK APPROACH ROAD	A1089
THURROCK PARK WAY ROUNDABOUT	A1089
SLIP ROAD FROM DOCK APPROACH ROAD TO A13	A13
SLIP ROAD FROM DOCK APPROACH ROAD TO A13	A13
STANFORD ROAD	A1013
LONDON ROAD	C Class
ENTRY ON SLIP ORSETT COCK ROUNDABOUT TO A13 EASTBOUND	A13
Orsett Cock FS West Slip Roads	A13
Orsett Cock FS East Slip Roads	A13
STANFORD ROAD	A1013
STANFORD BYPASS INTERCHANGE	A1014
ENTRY ON SLIP STANFORD INTERCHANGE TO A13 EASTBOUND	A13
EXIT OFF SLIP A13 EASTBOUND TO STANFORD INTERCHANGE	A13

EXIT OFF SLIP A13 WESTBOUND TO STANFORD INTERCHANGE	A13
ENTRY ON SLIP STANFORD INTERCHANGE TO A13 WESTBOUND	A13
SOUTHEND ROAD	B1420
THE MANORWAY SOUTHEND ROAD LINK WESTBOUND	A1014
THE MANORWAY SOUTHEND ROAD LINK EASTBOUND	A1014
THE MANORWAY	A1014
CORRINGHAM ROAD A1014 ROUNDABOUT	A1014
ORSETT COCK ROUNDABOUT TO STANFORD INTERCHANGE EASTBOUND	A13
STANFORD INTERCHANGE TO ORSETT COCK ROUNDABOUT WESTBOUND	A13
STANFORD INTERCHANGE TO BOROUGH BOUNDARY AT FIVE BELLS EASTBOUND	A13
BOROUGH BOUNDARY AT FIVE BELLS TO STANFORD INTERCHANGE WESTBOUND	A13
BELLS CORNER PARADE SOUTHEND ROAD	A176
BELLS CORNER ROUNDABOUT	A176
SOUTHEND ROAD	B1420
LINK ROAD FROM B1420 AND BELLS CORNER ROUNDABOUT TO BOUNDARY	B1420
THE MANORWAY	A1014
GIFFORDS CROSS ROAD	C Class
FOBBING ROAD	C Class
CHURCH ROAD	B1420
LAMPITS HILL	B1420
SOUTHEND ROAD	B1420
ENTRY ON SLIP FIVE BELLS ROUNDABOUT TO A13 WESTBOUND	A13
FIVE BELLS ROUNDABOUT SOUTH	A176
FIVE BELLS ROUNDABOUT NORTH	A176
EXIT OFF SLIP A13 EASTBOUND TO FIVE BELLS ROUNDABOUT	A13
FIVE BELLS SLIP ROAD FROM SOUTHEND ROAD WESTBOUND	A13

ASKEWS FARM LANE	Unclassified
WOULDHAM ROAD	Unclassified
LONDON ROAD	A126
ST CLEMENTS WAY ROUNDABOUT	A1090
BURNLEY ROAD	Unclassified
ST CLEMENTS WAY	A1090
STONEHOUSE CORNER ROUNDABOUT	A1090
SHIP LANE	C Class
ARTERIAL ROAD ROUNDABOUT	A1306
STONEHOUSE LANE	A1090
ARTERIAL ROAD	A1306
LONDON ROAD	A1090
LONDON ROAD	A1090
OLIVER ROAD	A1090
OLIVER CLOSE	A1090
STANFORD BYPASS INTERCHANGE	A1014

CORRINGHAM ROAD A1014 ROUNDABOUT	A1014
THE MANORWAY	A1014
THE MANORWAY	A1014
THE MANORWAY	A1014
ENTRY ON SLIP STANFORD INTERCHANGE TO A13 WESTBOUND	A13
EXIT OFF SLIP A13 EASTBOUND TO STANFORD INTERCHANGE	A13
ENTRY ON SLIP STANFORD INTERCHANGE TO A13 EASTBOUND	A13
EXIT OFF SLIP A13 WESTBOUND TO STANFORD INTERCHANGE	A13
CANTERBURY WAY SLIP ROAD ANTICLOCKWISE	A282
CANTERBURY WAY SLIP ROAD CLOCKWISE	A282
LINK ROAD FROM A13 SOUTHBOUND TO A1306	A13
LINK ROAD FROM A1306 TO A13 NORTHBOUND	A13

Essex County Council Roads

HAVEN ROAD, CANVEY ISLAND
ROSCOMMON WAY, CANVEY ISLAND
NORTHWICK ROAD, CANVEY ISLAND
A130 FROM SADDLERS FARM ROUNDABOUT TO JUNCTION WITH HAVEN ROAD
SADLERS FARM ROUNDABOUT
SLIPROADS LEADING TO AND FROM A13 FROM SADLERS FARM ROUNDABOUT
SLIPROADS LEADING TO AND FROM A130 FROM SADLERS FARM ROUNDABOUT
B1014 CANVEY ROAD FROM WATERSIDE ROUNDABOUT TO ROUNDABOUT ON HIGH STREET BENFLEET
CANVEY ISLAND PUBLIC FOOTPATH NUMBER 8
A130 AND B1014 BETWEEN THE ENTRANCE TO THE ISLAND AND ROUNDABOUT KNOWN AS THE WATERSIDE ROAD ROUNDABOUT

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Claim No. QB-2022-001317

In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)

Before the Honourable Mr Justice Julian Knowles
12 July 2024

B E T W E E N :

(1) THURROCK COUNCIL

(2) ESSEX COUNTY COUNCIL

Claimants

-and-

(1) MADELINE ADAMS

(2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

(223) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM

(224) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO ANY VEHICLE TRAVELLING ON TO, OFF, ALONG OR WHICH IS ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM

(225) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO, INTO OR OFF ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)

(226) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR ITS

FORECOURT WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(227) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)

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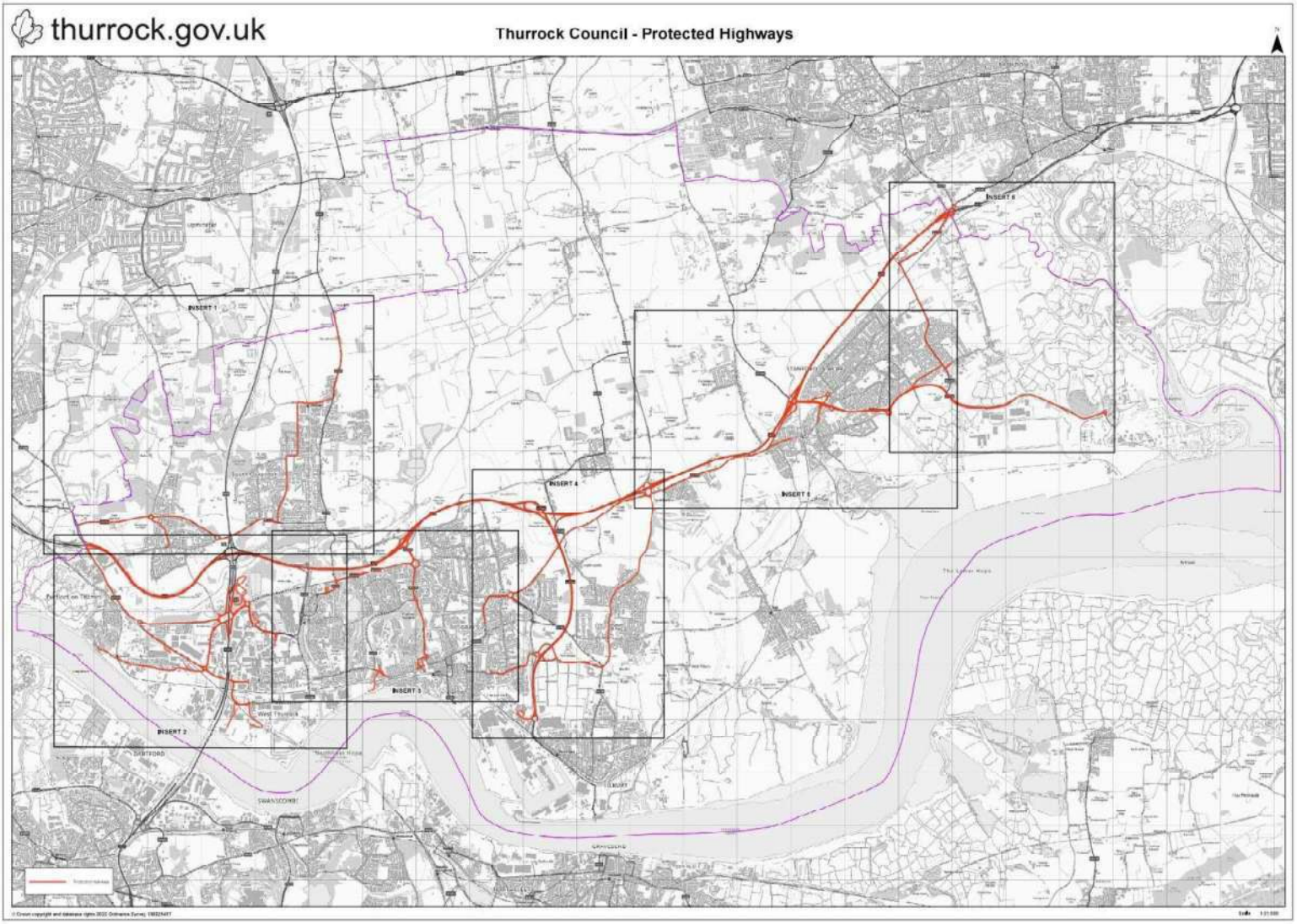
(229) PERSONS UNKNOWN WHO ARE TRESPASSING ON, UNDER OR ADJACENT TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY UNDERTAKING EXCAVATIONS, DIGGING, DRILLING AND/OR TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY AUTHORITY

(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

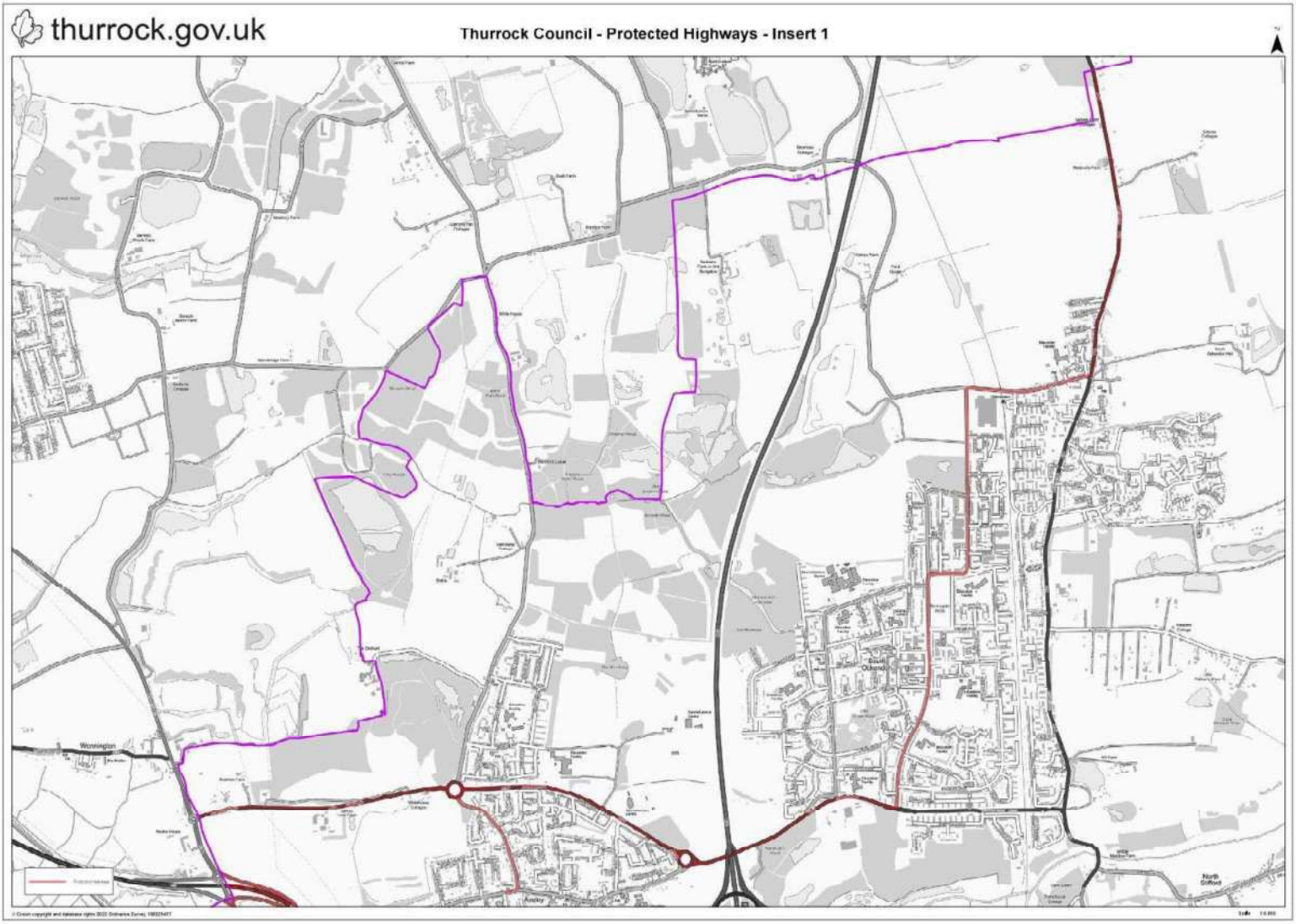
Defendants

ANNEXE 2

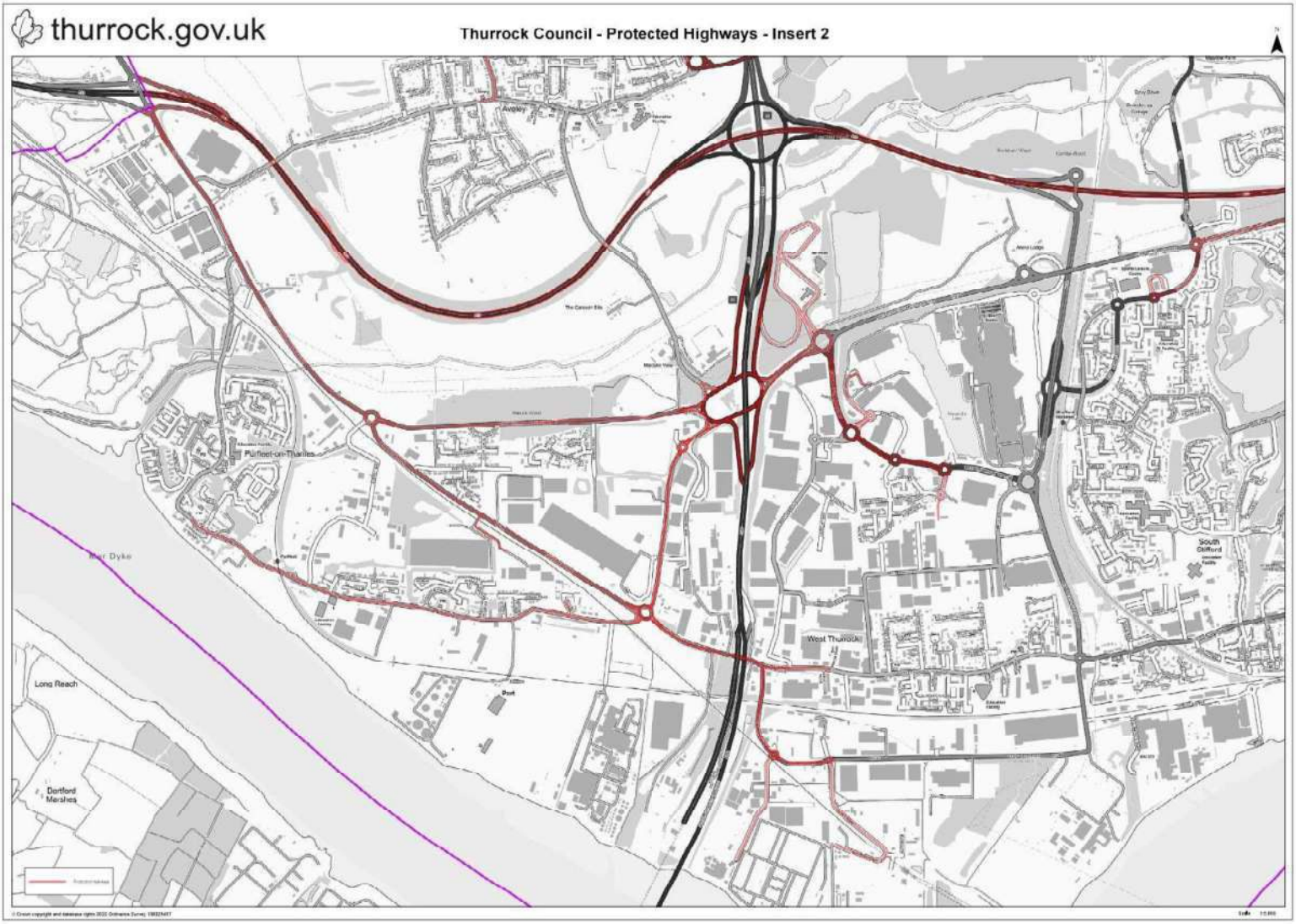

thurrock.gov.uk
Thurrock Council - Protected Highways
INSERT 1
INSERT 2
INSERT 3
INSERT 4
INSERT 5
INSERT 6

B 3

28

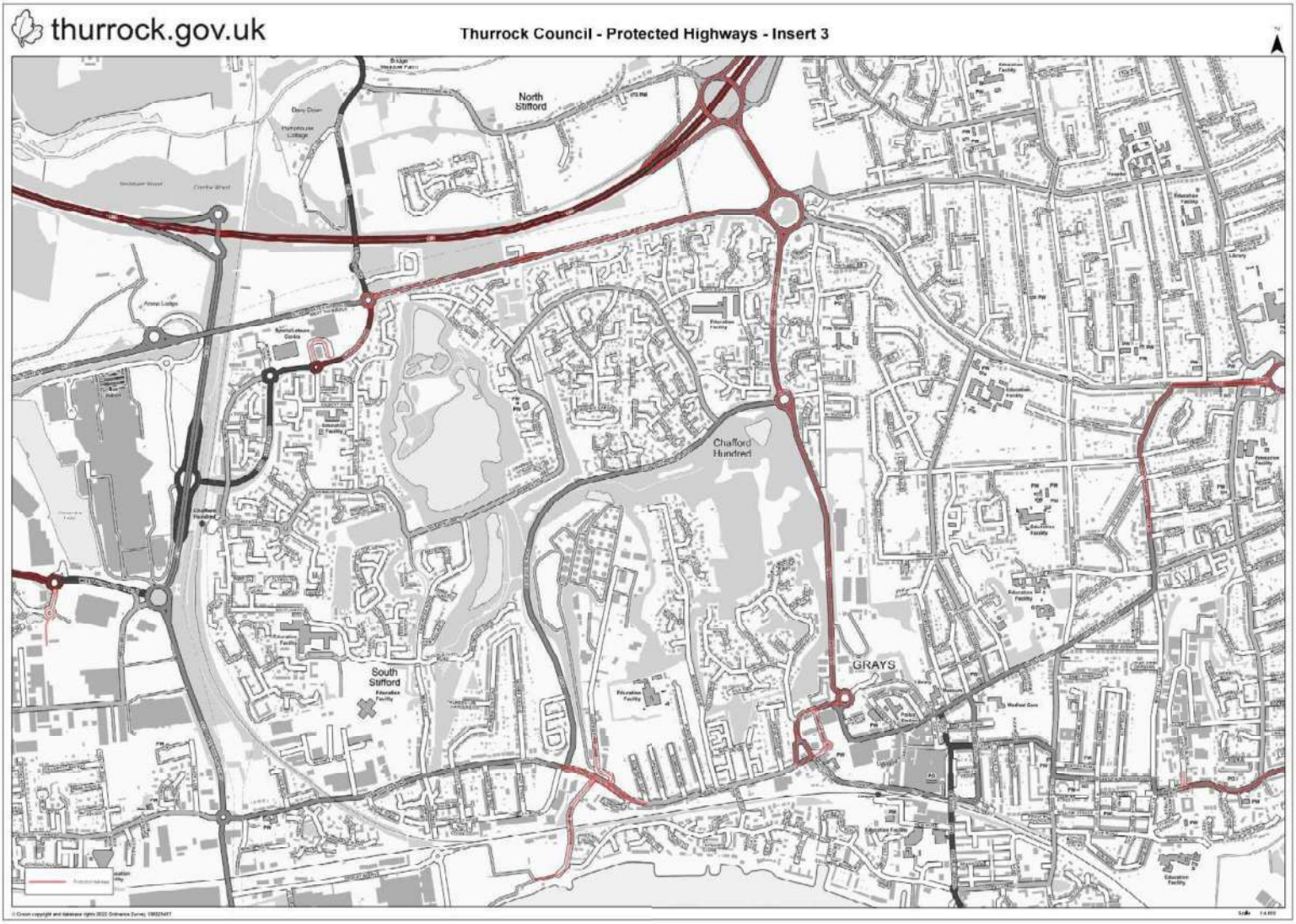

thurrock.gov.uk
Thurrock Council - Protected Highways - Insert 1
Wennington
North Stifford

B 4

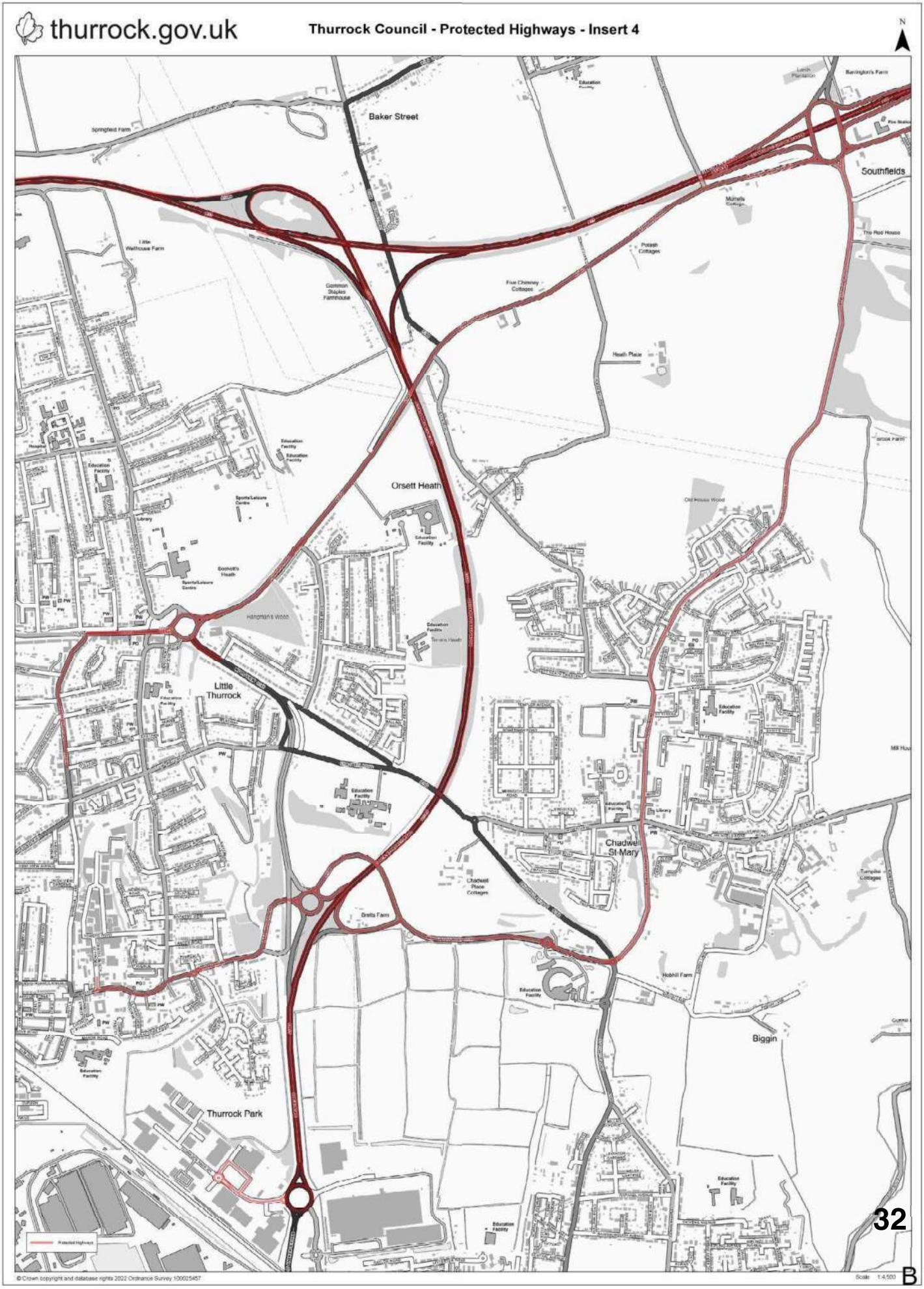

thurrock.gov.uk
Thurrock Council - Protected Highways - Insert 2
Purfleet-on-Thames
Long Reach
Dartford Marshes
West Thurrock
South Stifford

B 5

30


thurrock.gov.uk
Thurrock Council - Protected Highways - Insert 3
North Stifford
Chafford Hundred
GRAYS
South Stifford

B 6


thurrock.gov.uk
Thurrock Council - Protected Highways - Insert 4
N
Baker Street
Springfield Farm
Southfields
Orsett Heath
Little Thurrock
Chadwell St Mary
Thurrock Park
Biggin
Hobhill Farm
Brett's Farm
Chadwell Place Cottages
Five Chimney Cottages
Potash Cottages
Health Place
Gunman Shades Farmhouse
Little Wellhouse Farm
Hangman's Wood
Old House Wood
Education Facility
Sports/Leisure Centre
Library
Scratton's Heath
Protected Highways
32
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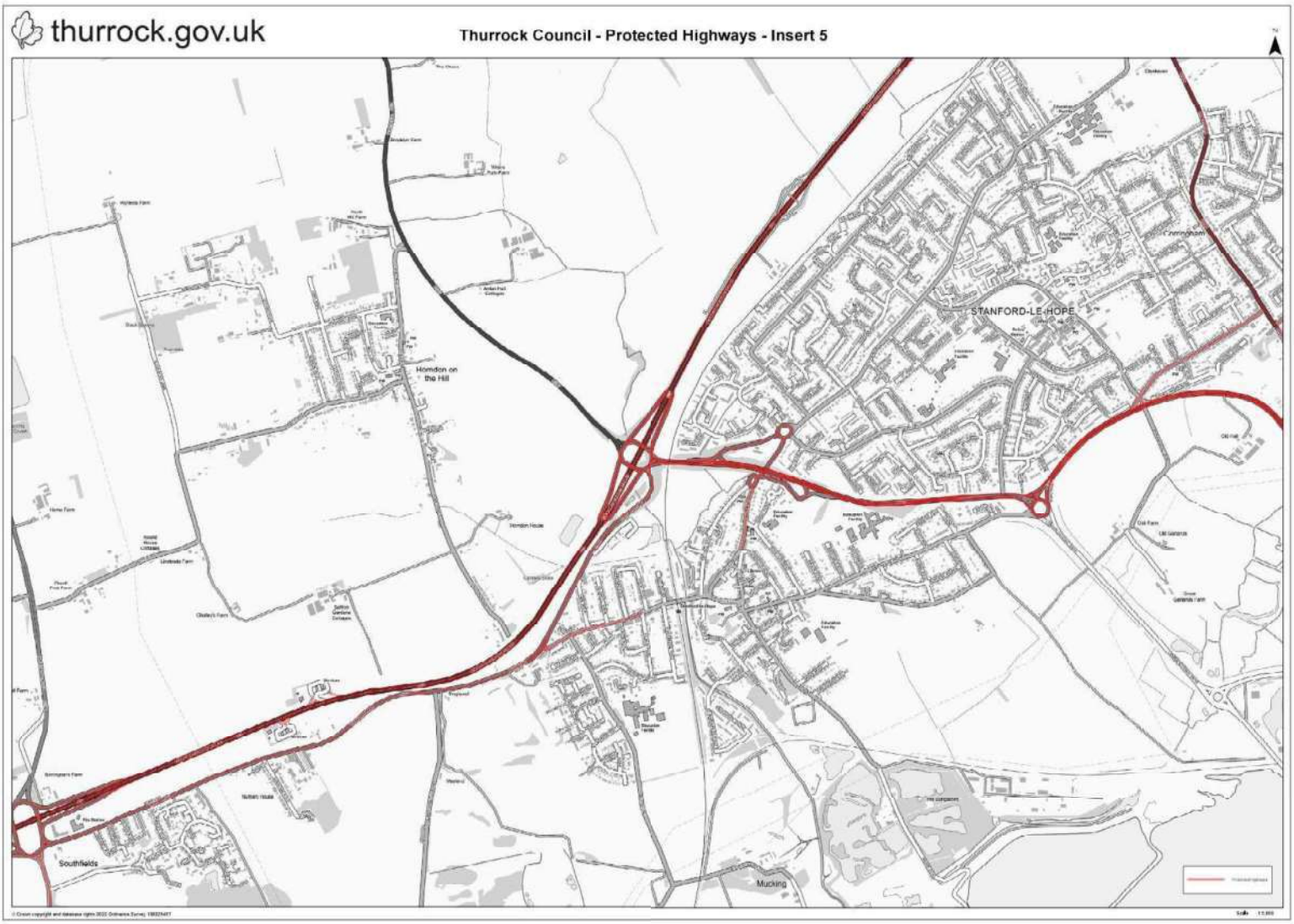
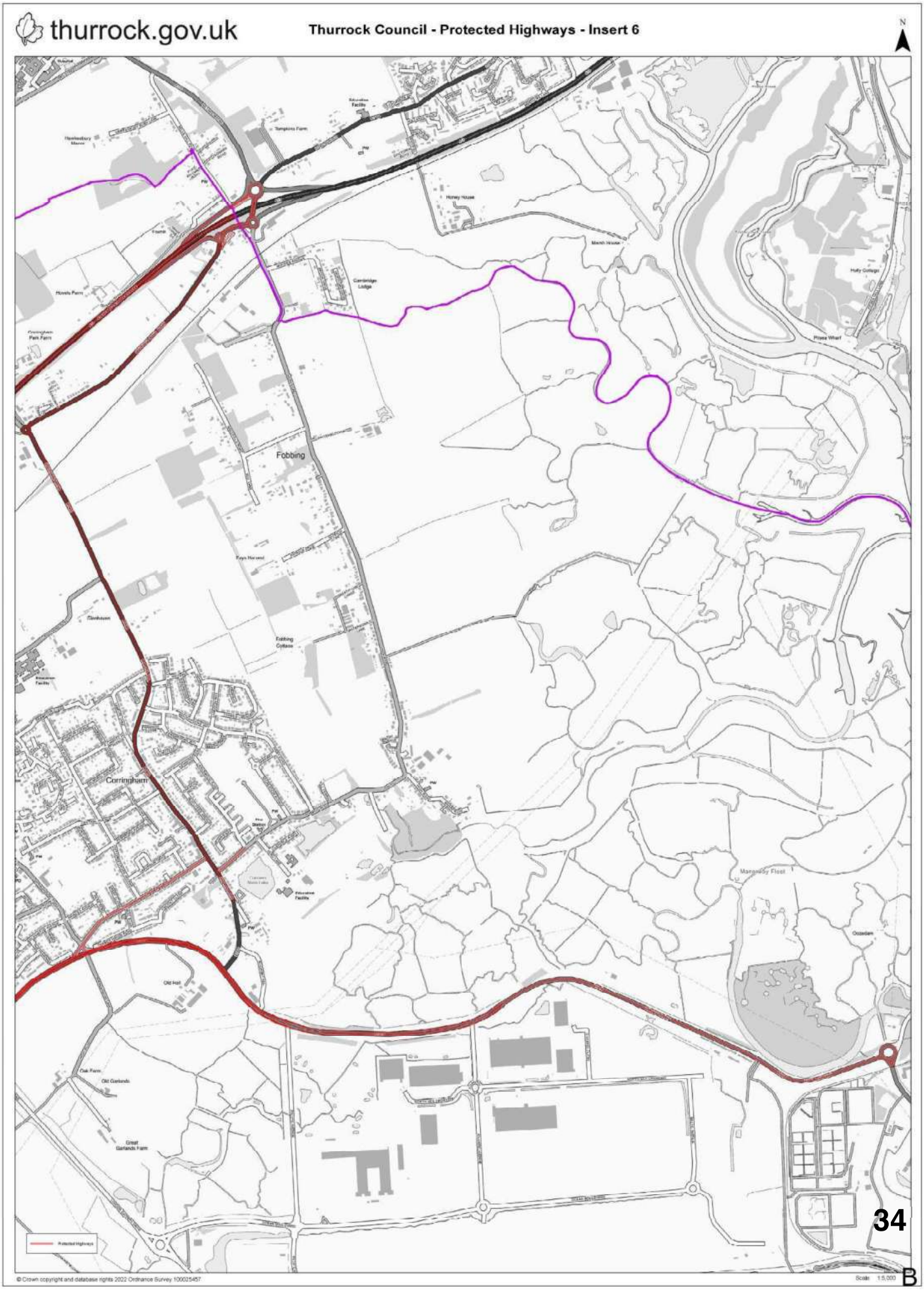
Scale 1:4,500

B 7


thurrock.gov.uk
Thurrock Council - Protected Highways - Insert 5
STANFORD-LE-HOPE
Horndon on the Hill
Southfields
Mucking

B 8


thurrock.gov.uk
Thurrock Council - Protected Highways - Insert 6
N
Fobbing
Corringham
34
© Crown copyright and database rights 2022 Ordnance Survey 100025457

B 9

IN THE HIGH COURT OF JUSTICE **Claim No. QB-2022-001317**
KING'S BENCH DIVISION

In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)

Before the Honourable Mr Justice Julian Knowles
12 July 2024

B E T W E E N :

(1) THURROCK COUNCIL

(2) ESSEX COUNTY COUNCIL

Claimants

-and-

(1) MADELINE ADAMS

(2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

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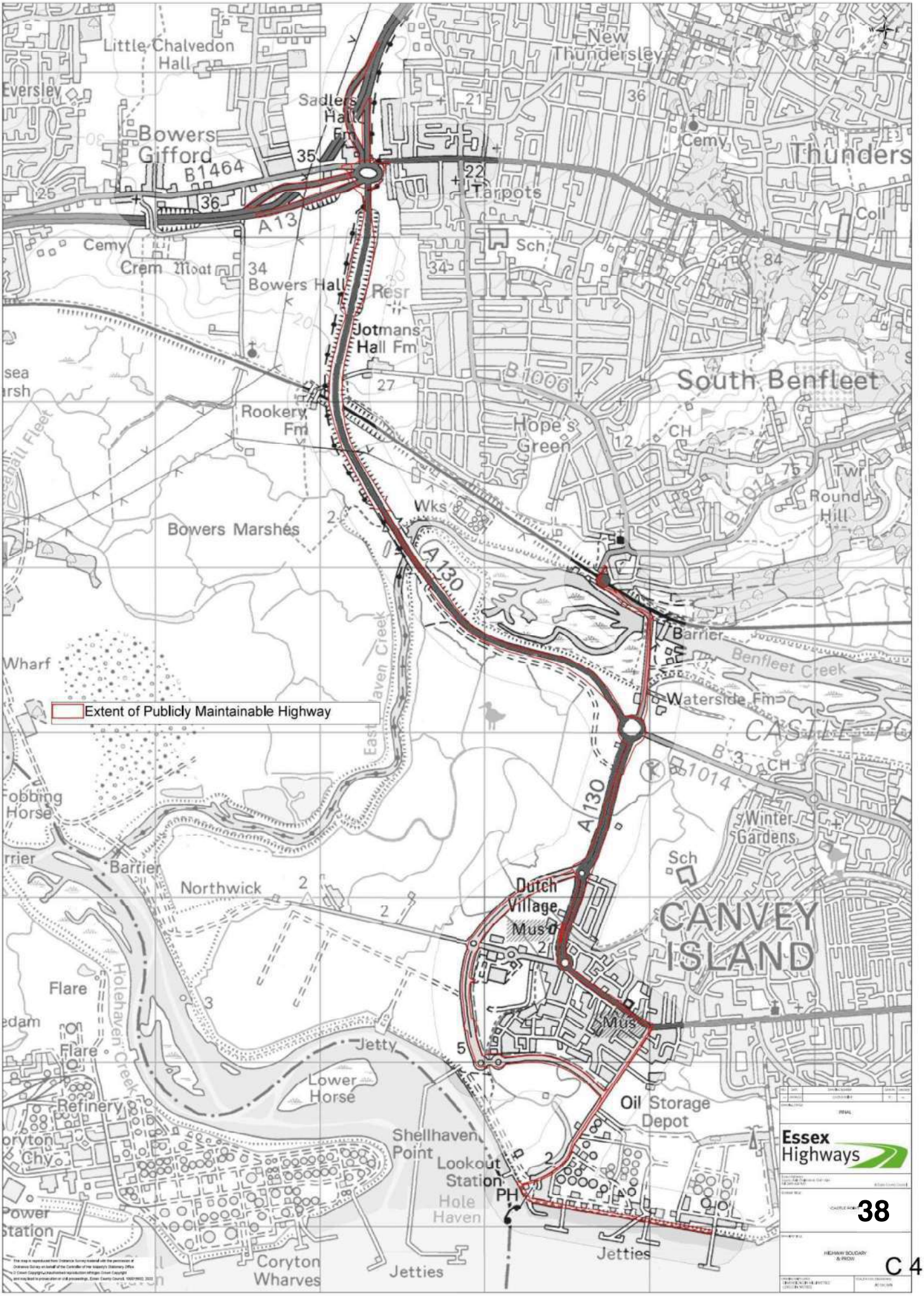
(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

Defendants

ANNEXE 3

Haverhill
Clare
Acton
Sudbury
Kesgrave
Ipswich
Hadleigh
Saffron Walden
ESSEX COUNTY
Thaxted
Halstead
Colchester
Braintree
Coggeshall
Wivenhoe
Walton-on-the-Na
Frinton-on-Sea
Brightlingsea
Clacton-on-Sea
West Mersea
Witham
Sawbridgeworth
Harlow
Chelmsford
Maldon
Epping
Ongar
Southminster
South Woodham Ferrers
Burnham-on-Crouch
Laughton
Billericay
Brentwood
Wickford
Rayleigh
Rochford
Basildon
Southend-on-Sea
Stanford-le-Hope
Canvey Island


Extent of Publicly Maintainable Highway
Little Chalvedon Hall
New Thundersley
Eversley
Sadlers Hall Fm
Bowers Gifford
B1464
A13
Tarpots
Cemy
Crem
Moat
Bowers Hall
Resr
Jotmans Hall Fm
Rookery Fm
B1006
South Benfleet
Hope's Green
CH
Twr
Round Hill
B1014
Wks
Bowers Marshes
A130
Barrier
Benfleet Creek
Waterside Fm
Wharf
East Haven Creek
Winter Gardens
Sch
Dutch Village
Mus
CANVEY ISLAND
Northwick
Barrier
Flare
Holehaven Creek
Jetty
Lower Horse
Refinery
Oil Storage Depot
Shellhaven Point
Lookout Station
PH
Hole Haven
Power Station
Coryton Wharves
Jetties
Essex Highways
38
HIGHWAY BOUDARY & PROW
C 4

IN THE HIGH COURT OF JUSTICE
KING BENCH DIVISION

CLAIM NO: KB-2024-001765

Before Mr Justice Julian Knowles
On 20 June 2024

BETWEEN:-

(1) LONDON CITY AIRPORT LIMITED
(2) DOCKLANDS AVIATION GROUP LIMITED

Claimants

- v -

PERSONS UNKNOWN WHO, IN CONNECTION WITH THE JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN, ENTER OCCUPY OR REMAIN (WITHOUT THE CLAIMANTS' CONSENT) UPON THAT AREA OF LAND KNOWN AS LONDON CITY AIRPORT (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED PLAN 1) BUT EXCLUDING THOSE AREAS OF LAND AS FURTHER DEFINED IN THE CLAIM FORM

KB-2024-001765

Defendant

ORDER

PENAL NOTICE

IF YOU THE WITHIN 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 OR PERSONS UNKNOWN TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS AND PERSONS UNKNOWN

This Order prohibits you from doing the acts set out in this Order. You should read it very carefully. You are advised to consult a solicitor as soon as possible. You have the right to ask the Court to vary or discharge this Order.

UPON the Claimants' claim by Claim Form, dated 12 June 2024

AND UPON hearing the Claimants' application for an interim injunction, dated 12 June 2024, and supporting evidence, without Persons Unknown being notified

AND UPON hearing Counsel for the Claimants

AND UPON the Claimants giving and the Court accepting the undertakings set out in Schedule 2 to this Order

AND UPON the "Land" being defined as that land known as London City Airport, as shown for identification edged red on the attached Plan 1 in Schedule 1, but excluding:

a. Those buildings shaded blue on Plan 1;
b. In those buildings shaded green on Plan 1, the areas edged blue on Plans 2-8;
c. In those areas shaded purple, the land suspended over the ground and forming part of the Docklands Light Railway.
d. In the areas shaded pink, the underground rail tunnel, the subway and that part of Docklands Light Railway located below ground level.

IT IS ORDERED THAT:

INJUNCTION

1. Until 20 June 2029 or final determination of the claim or further order in the meantime, whichever shall be the earlier, Persons Unknown must not, without the consent of the Claimants, enter, occupy or remain upon the Land.

2. In respect of paragraph 1, Persons Unknown must not: (a) do it himself/herself/themselves or in any other way; (b) do it by means of another person acting on his/her/their behalf, or acting on his/her/their instructions.

3. The injunction contained at paragraph 1 of this Order shall be reviewed on each anniversary of this Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 1.5 hours. The Claimants are permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the review hearing.

VARIATION

4. Anyone served with or notified of 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 Claimants' solicitors 72 hours' notice of such application. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Claimants' solicitors at least 48 hours in advance of any hearing.

5. Any person applying to vary or discharge this Order must provide their full name, address and address for service.

6. The Claimants have liberty to apply to vary this Order.

SERVICE AND NOTIFICATION

7. Service of the claim form, the application for interim injunction and this Order is dispensed with, pursuant to CPR 6.16, 6.28 and 81.4(2)(c).

8. Pursuant to the guidance in *Wolverhampton CC v London Gypsies & Travellers* [2024] 2 WLR 45, the Claim Form, Application Notice, evidence in support and Note of the Hearing on 20 June 2024 will be notified to Persons Unknown by the Claimants carrying out each of the following steps:

    a. Uploading a copy onto the following website: https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction

    b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above.

    c. Either affixing a notice at those locations marked with an "X" on Plan 1 setting out where these documents can be found and obtained in hard copy or including this information in the warning notices referred to at paragraph 9(d) below.

9. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, this Order shall be notified to Persons Unknown by the Claimants carrying out each of the following steps:

a. Uploading a copy of the Order onto the following website: https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction

b. Sending an email to the email addresses listed in Schedule 3 to this Order attaching a copy of this Order.

c. Affixing a copy of the Order in A4 size in a clear plastic envelope at those locations marked with an "X" on Plan 1.

d. Affixing warning notices of A2 size at those locations marked with an "X" on Plan 1.

10. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification to Persons Unknown of any further applications shall be effected by the Claimants carrying out each of the following steps:

a. Uploading a copy of the application onto the following website: https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction.

b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that an application has been made and that the application documents can be found at the website referred to above.

c. Affixing a notice at those locations marked with an "X" on Plan 1 stating that the application has been made and where it can be accessed in hard copy and online.

11. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification of any further documents to Persons Unknown may be effected by carrying out the steps set out in paragraph 10(a)-(b) only.

12. In respect of paragraphs 8 to 11 above, effective notification will be deemed to have taken place on the date on which all of the relevant steps have been carried out.

13. For the avoidance of doubt, in respect of the steps referred to at paragraphs 8(c), 9(c)-(d) and 10(c), effective notification will be deemed to have taken place when those documents are first affixed regardless of whether they are subsequently removed.

FURTHER DIRECTIONS

14. Liberty to apply.

15. Costs are reserved.

COMMUNICATIONS WITH THE CLAIMANT

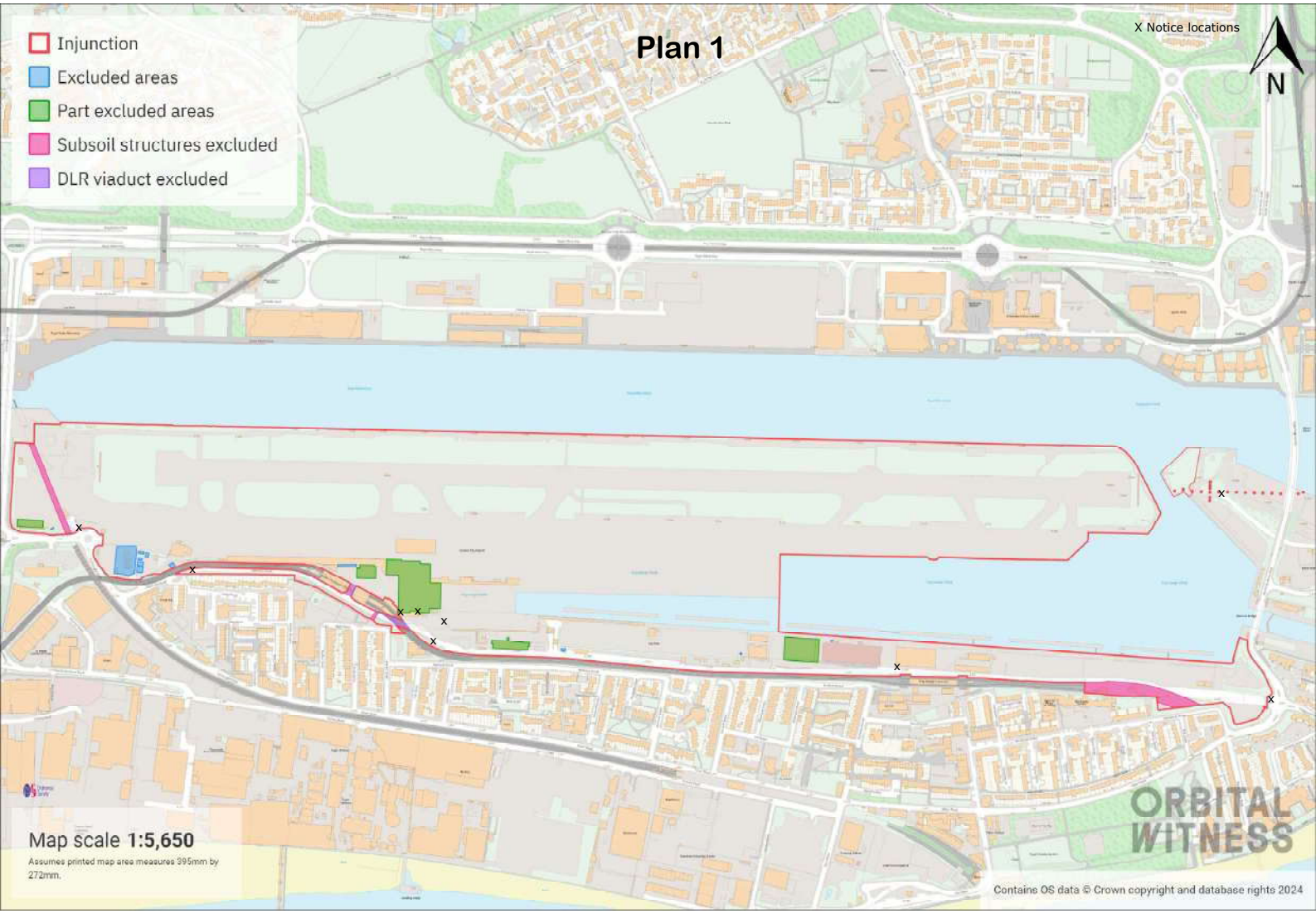
16. The Claimants' solicitors and their contact details are:

(1) Stuart Wortley
Eversheds Sutherland (International) LLP
StuartWortley@eversheds-sutherland.com
07712 881 393

(2) Nawaaz Allybokus
Eversheds Sutherland (International) LLP
NawaazAllybokus@eversheds-sutherland.com
07920 590 944

Dated: 20 June 2024

SCHEDULE 1 - PLANS

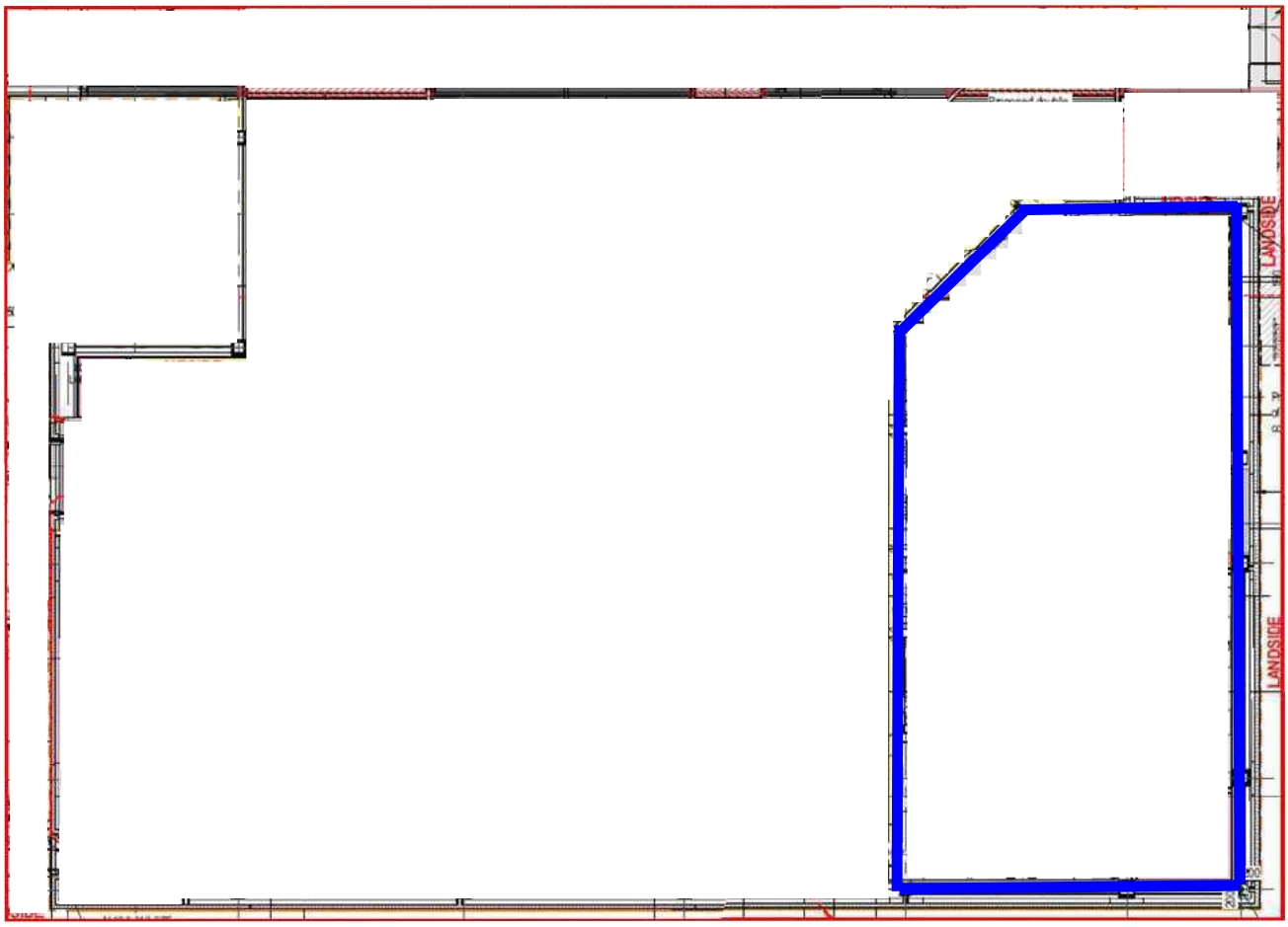

Plan 1
Injunction
Excluded areas
Part excluded areas
Subsoil structures excluded
DLR viaduct excluded
X Notice locations
N
Map scale 1:5,650
Assumes printed map area measures 395mm by 272mm.
ORBITAL WITNESS
Contains OS data © Crown copyright and database rights 2024

Main Terminal - Ground Floor

Plan 2

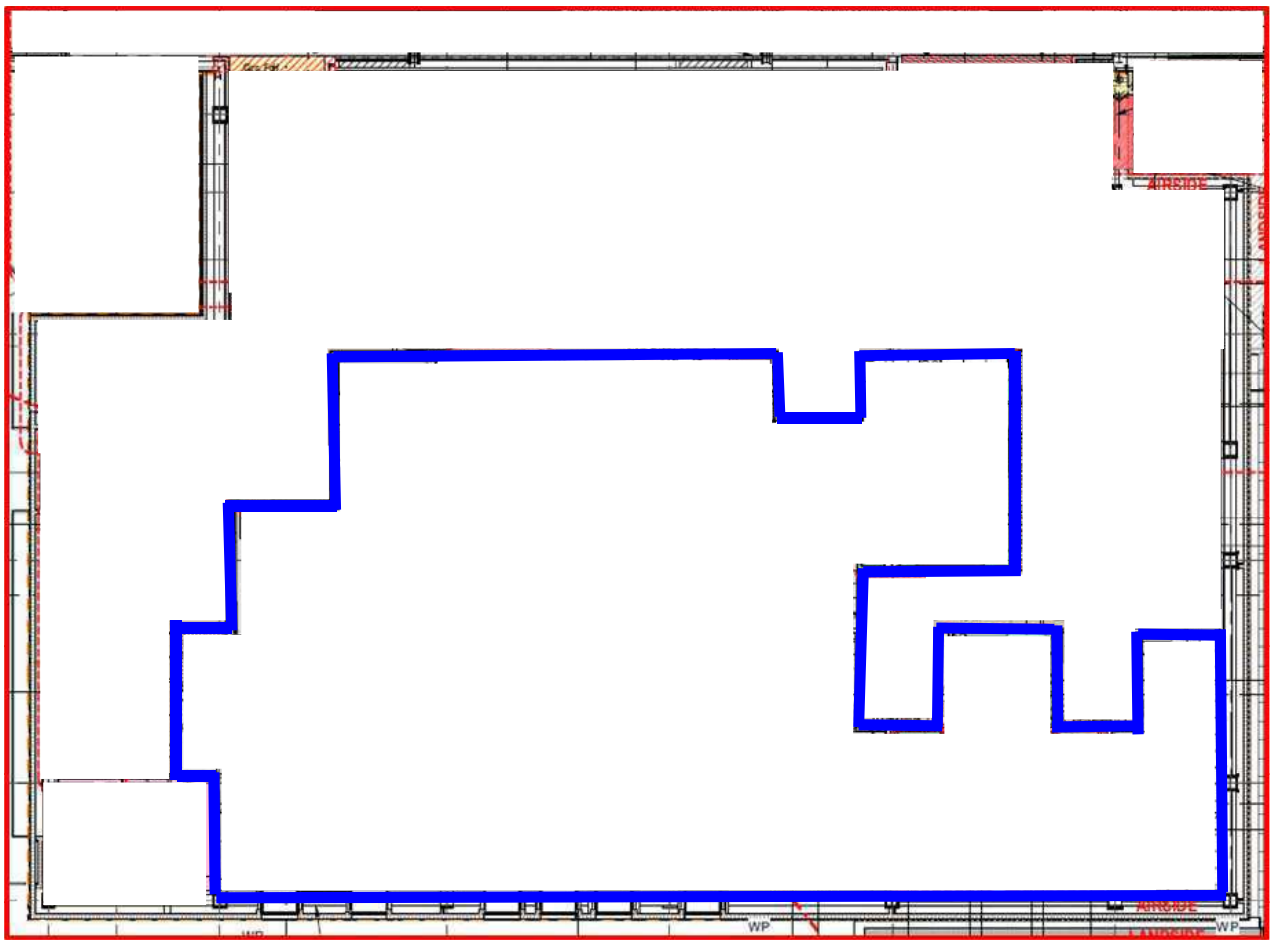
r r r d r

Plan 3



Terminal Immigration Facilities - r Floor

Plan 4



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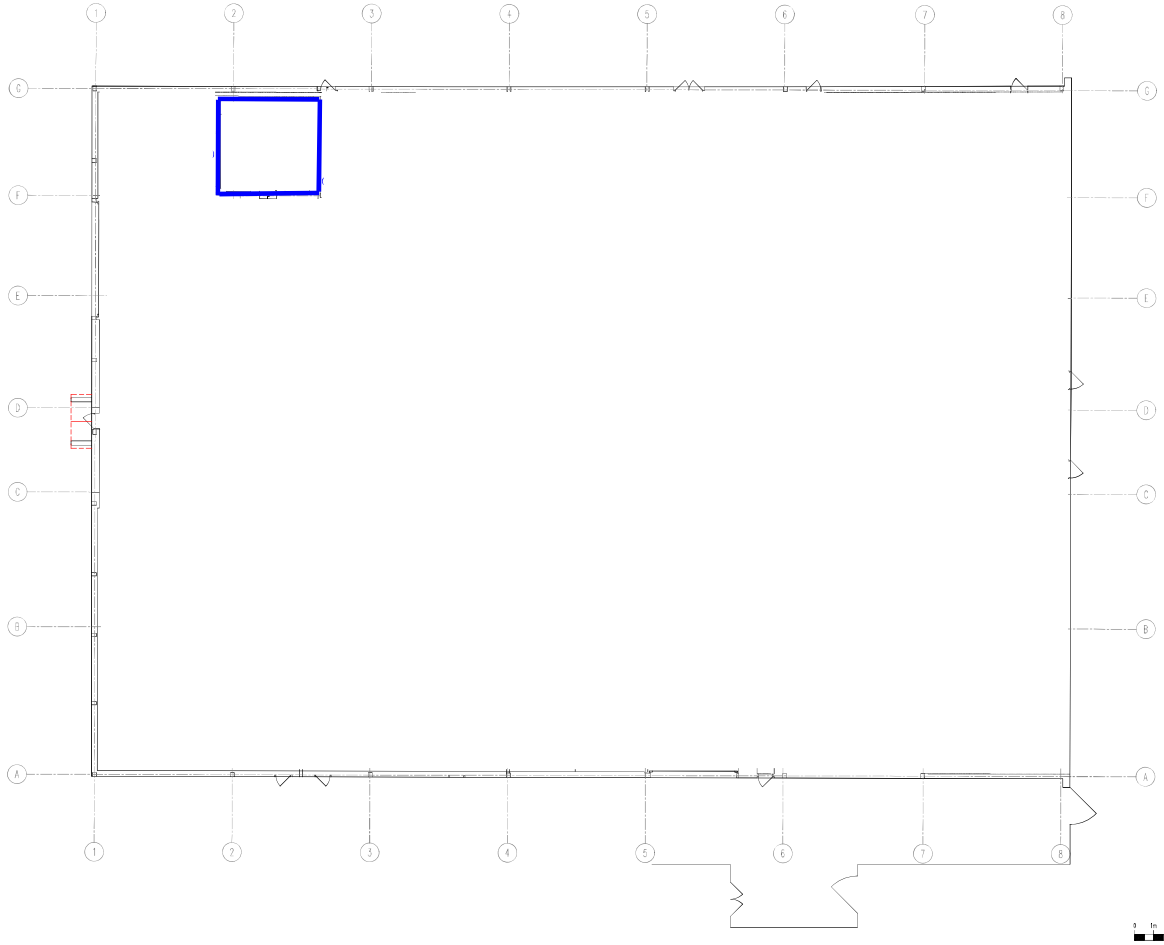
Plan 5



DO NOT SCALE - IF IN DOUBT ASK
Associated Drawings

General Notes:

B	Room Numbers Added
A	Door Numbers Added

GND FLR

RECORD DRAWING

BLUE SHED

Ground Floor
General Arrangement Plan

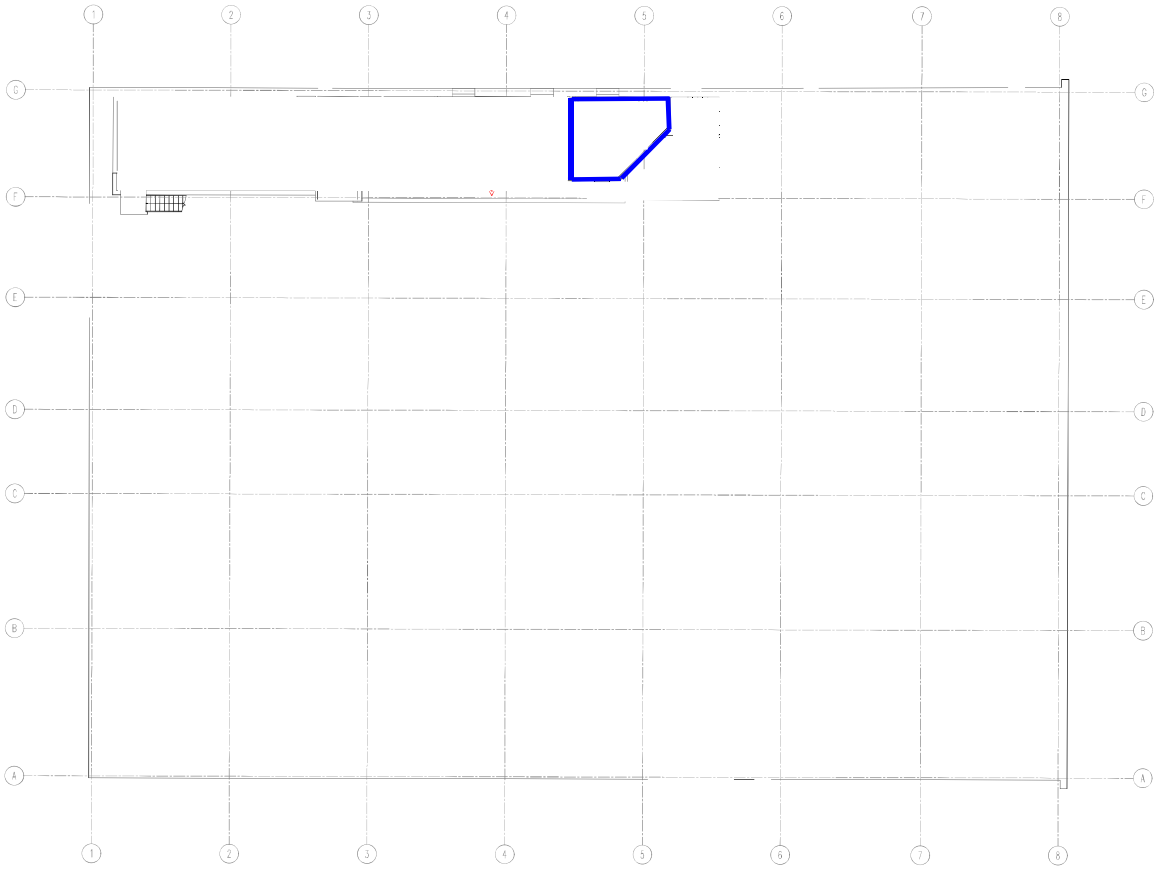
04/04/16 VR

R/BS/G/A/001

SCALE BAR 1:100 @ A1

Blue Shed - r Floor

Plan 6



DO NOT SCALE - IF IN DOUBT ASK
Associated Drawings

General Notes:

LEGEND
FIRE DOOR
STANDARD DOOR

1ST FLR

London City Airport

RECORD DRAWING

BLUE SHED

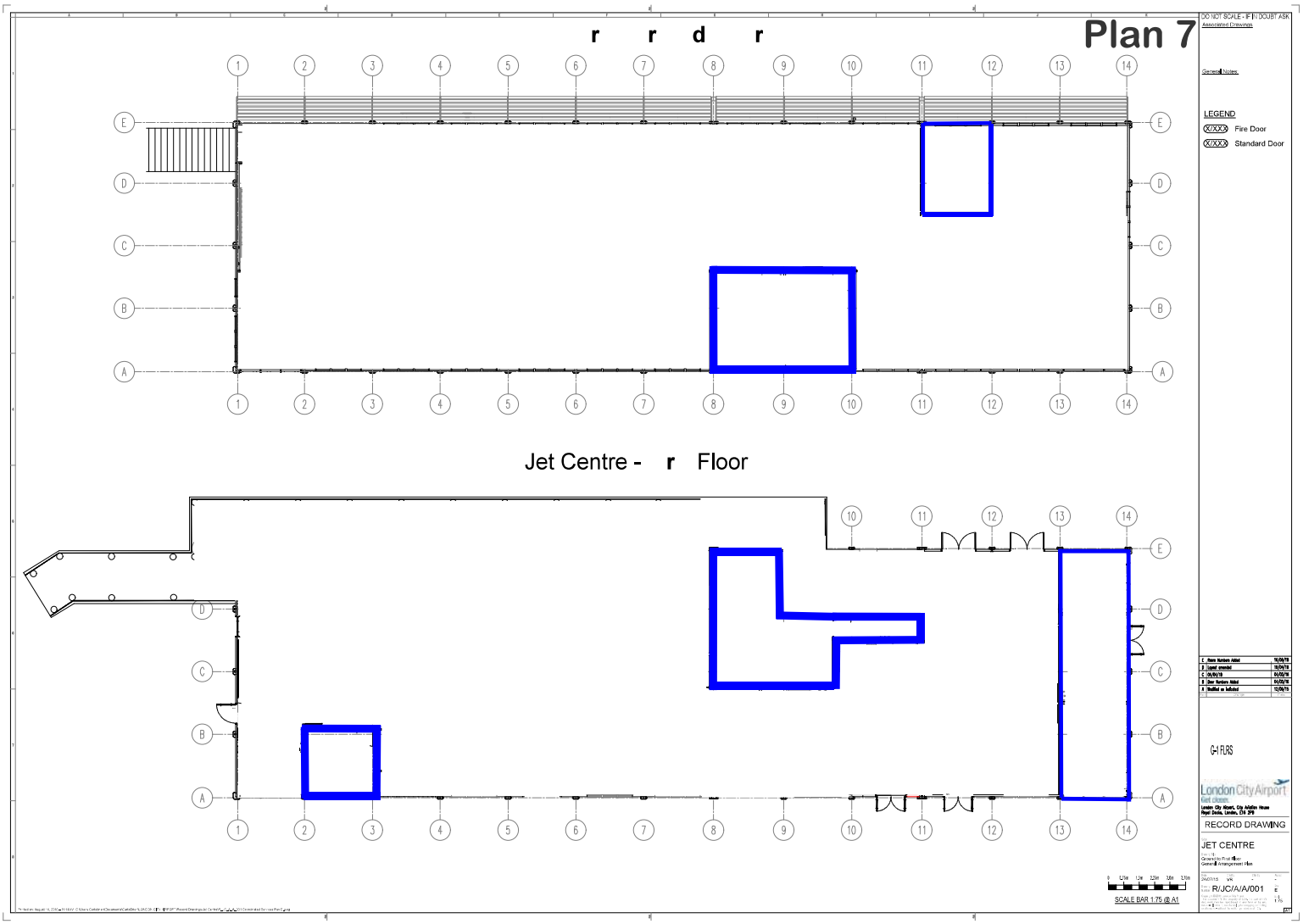
Ground Floor
General Arrangement

04/04/16 VR

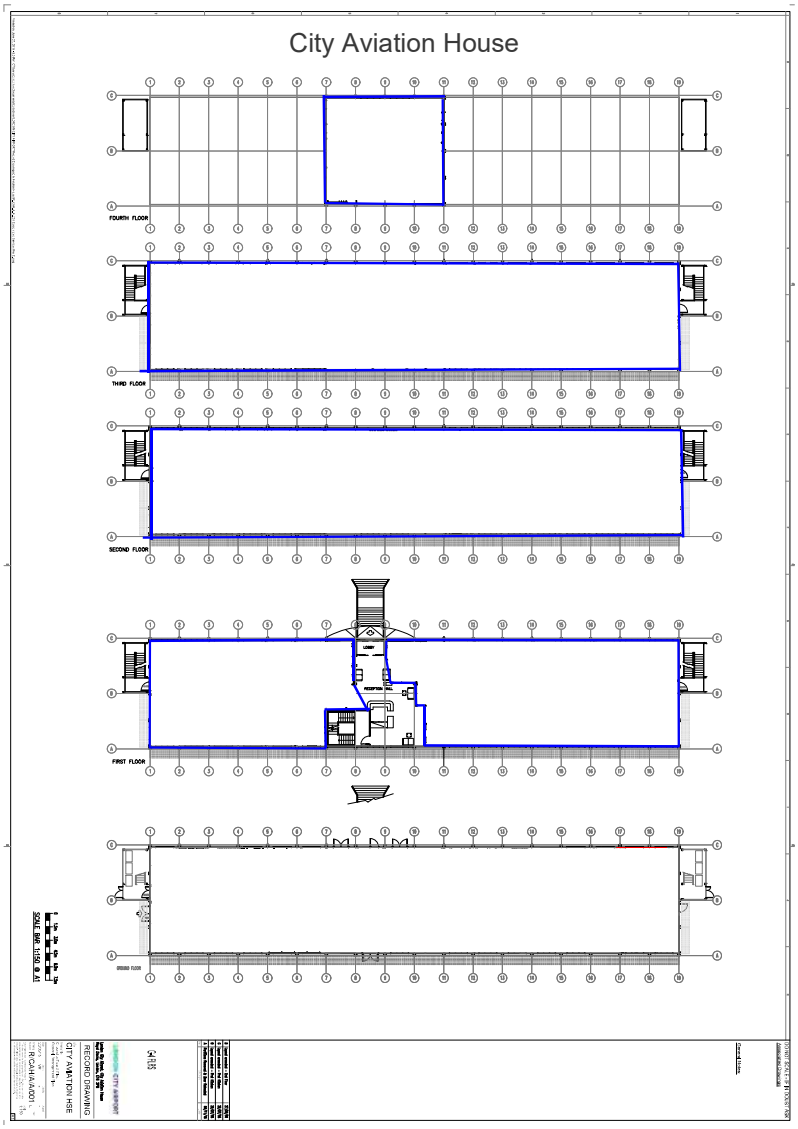
R/BS/1/A/001

1:100

SCALE BAR 1:100 @ A1


r r d r
Plan 7
DO NOT SCALE - IF IN DOUBT ASK
Associated Drawings
General Notes
LEGEND
XXXX Fire Door
XXXX Standard Door
Jet Centre - r Floor
GI FLRS
London City Airport
RECORD DRAWING
JET CENTRE
R/JC/A/A/001
SCALE BAR 1:75 @ A1

Plan


City Aviation House
FOURTH FLOOR
THIRD FLOOR
SECOND FLOOR
FIRST FLOOR
RECORD DRAWING

SCHEDULE 2 - UNDERTAKING GIVEN BY THE CLAIMANTS

(1) The Claimants will take steps to notify Persons Unknown of the claim form, application notice, evidence in support, the Note of the Hearing on 20 June 2024, and the Order as soon as practicable and no later than 5pm on Monday 24 June 2024.

(2) The Claimants will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a future Defendant and the Court finds that the future Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org

IN THE HIGH COURT OF JUSTICE **Claim No: KB-2024-002210**

KINGS BENCH DIVISION

Before The Honourable Mr Justice Julian Knowles

BETWEEN:

HEATHROW AIRPORT LIMITED

Claimant

-and-

PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN (WITHOUT THE CLAIMANT'S CONSENT) UPON 'LONDON HEATHROW AIRPORT' AS IS SHOWN EDGED PURPLE ON THE ATTACHED PLAN A TO THE PARTICULARS OF CLAIM

Defendants

ORDER

PENAL NOTICE

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UPON the Claimant having issued this Claim by a Claim Form dated 7 July 2024

AND UPON hearing the Claimant's application for an interim injunction by Application Notice dated 7 July 2024

AND UPON READING the Witness Statements of Akhil Markanday dated 6 July 2024 and Jonathan Daniel Coen dated 7 July 2024

AND UPON HEARING Leading Counsel and Junior Counsel for the Claimant

AND UPON the Claimant giving and the Court accepting the undertakings set out in Schedule 1 to this Order

IT IS ORDERED THAT:

INJUNCTION

1. Until 9 July 2029 or final determination of the Claim or further order in the meantime, whichever shall be the earlier, the Defendants must not, without the consent of the Claimant, enter, occupy or remain on Heathrow Airport, Hounslow, Middlesex, as shown edged purple on the plan annexed to this Order at Schedule 2 ("Plan A").

2. In respect of paragraph 1, the Defendants must not (a) do it himself/herself/themselves in any other way (b) do it by means of another person acting on his/her/their behalf, or acting on his/her/their instructions.

3. The injunction set out at paragraph 1 of this Order shall be reviewed annually on each anniversary of the Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 1 ½ hours. The Claimant is permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton Arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the hearing.

VARIATION

4. Anyone served with or notified of 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 the application the substance of it must be communicated in writing to the Claimant's solicitors at least 48 hours in advance of any hearing.

5. Any person applying to vary or discharge this Order must provide their full name, address and address for service.

6. The Claimant has liberty to apply to vary this Order.

SERVICE AND NOTIFICATION

7. Service of the Claim Form, the Application for interim injunction and this Order is dispensed with, pursuant to CPR 6.16, 6.28 and 81.4(2)(c).

8. Pursuant to the guidance in *Wolverhampton CC v London Gypsies & Travellers* [2024] 2 WLR 45, the Claim Form, Application Notice, evidence in support and a Note of the Hearing on 9 July 2024 will be notified to the Defendants by the Claimant carrying out each of the following steps:

8.1 Uploading a copy on to the following website: www.heathrow.com/injunction

8.2 Sending an email to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made and that the documents can be found at the website referred to above.

8.3 Either affixing a notice at the locations shown marked with a red dot on the second plan attached to this Order at Schedule 4 ("Plan B") setting out where these documents can be found and obtained in hard copy or including this information in the warning notices referred to at paragraph 9.4 below.

9. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, this Order shall be notified to the Defendants by the Claimant carrying out each of the following steps:

9.1 Uploading a copy of the Order on to the following website: www.heathrow.com/injunction

9.2 Sending an email to the email addresses listed in Schedule 3 to this Order attaching a copy of this Order.

9.3 Affixing a copy of the Order in A4 size in a clear plastic envelope at each of the locations shown with a red dot on Plan B.

9.4 Affixing warning notices of A2 size at those locations marked with a red dot on Plan B, substantially in the form of the notice at Schedule 5.

10. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification to the Defendants of any further applications shall be effected by the Claimant carrying out each of the following steps:

10.1 Uploading a copy of the application on to the following website: www.heathrow.com/injunction

10.2 Sending an email to the email addresses listed in Schedule 3 to this Order stating that an application has been made and that the application documents can be found at the website referred to above.

10.3 Affixing a notice at these locations marked with a red dot on Plan B stating that the application has been made and where it can be accessed in hard copy and online.

11. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification of any further documents to the Defendants may be effected by carrying out the steps set out in paragraphs 10.1 and 10.2 only.

12. In respect of paragraphs 8 to 11 above, effective notification will be deemed to have taken place on the date on which all the relevant steps have been carried out.

13. For the avoidance of doubt, in respect of the steps referred to at paragraphs 8.3, 9.3 and 10.3, effective notification will be deemed to have taken place when the documents have all been first affixed regardless of whether they are subsequently removed.

FURTHER DIRECTIONS

14. Liberty to apply.

COSTS

15. Costs reserved.

COMMUNICATIONS WITH THE CLAIMANT

16. The Claimant's solicitors and their contact details are:

(1) Akhil Markanday

Bryan Cave Leighton Paisner, Governor's House, 5 Laurence Pountney Hill, London EC4R 0BR akhil.markanday@bclplaw.com / +44 20 3400 4344

(2) Phil Spencer

Bryan Cave Leighton Paisner, Governor's House, 5 Laurence Pountney Hill, London EC4R 0BR phil.spencer@bclplaw.com / +44 20 3400 3119

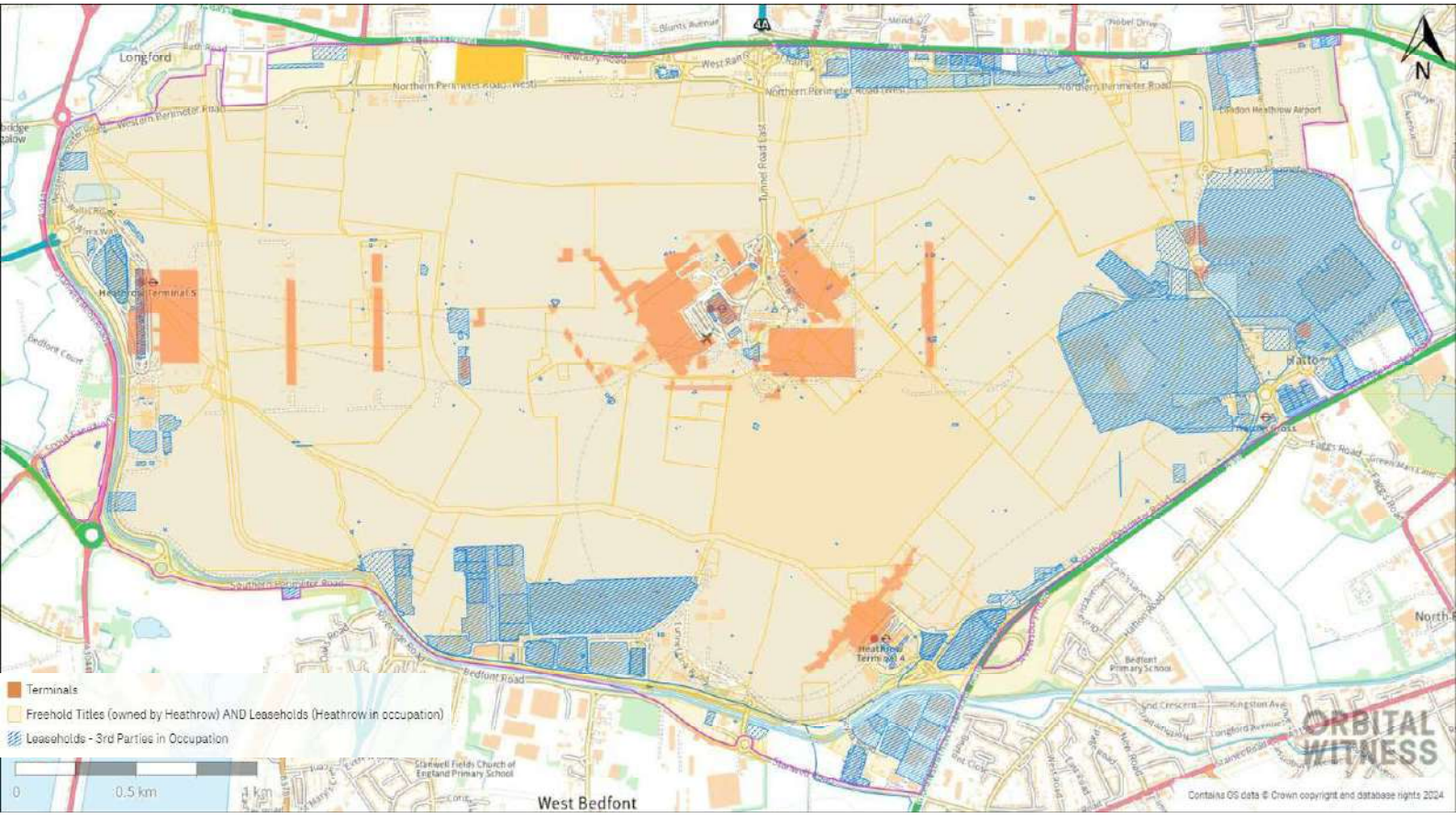
Dated: 9 July 2024

SCHEDULE 1 – UNDERTAKINGS

1. The Claimant will take steps to notify Defendants of the Claim Form, Application Notice, evidence in support, the Order and a Note of the Hearing on 9 July 2024 as soon as practicable and no later than 5pm on 15 July 2024.

2. The Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a future Defendant and the Court finds that the future Defendant ought to be compensated for that loss.

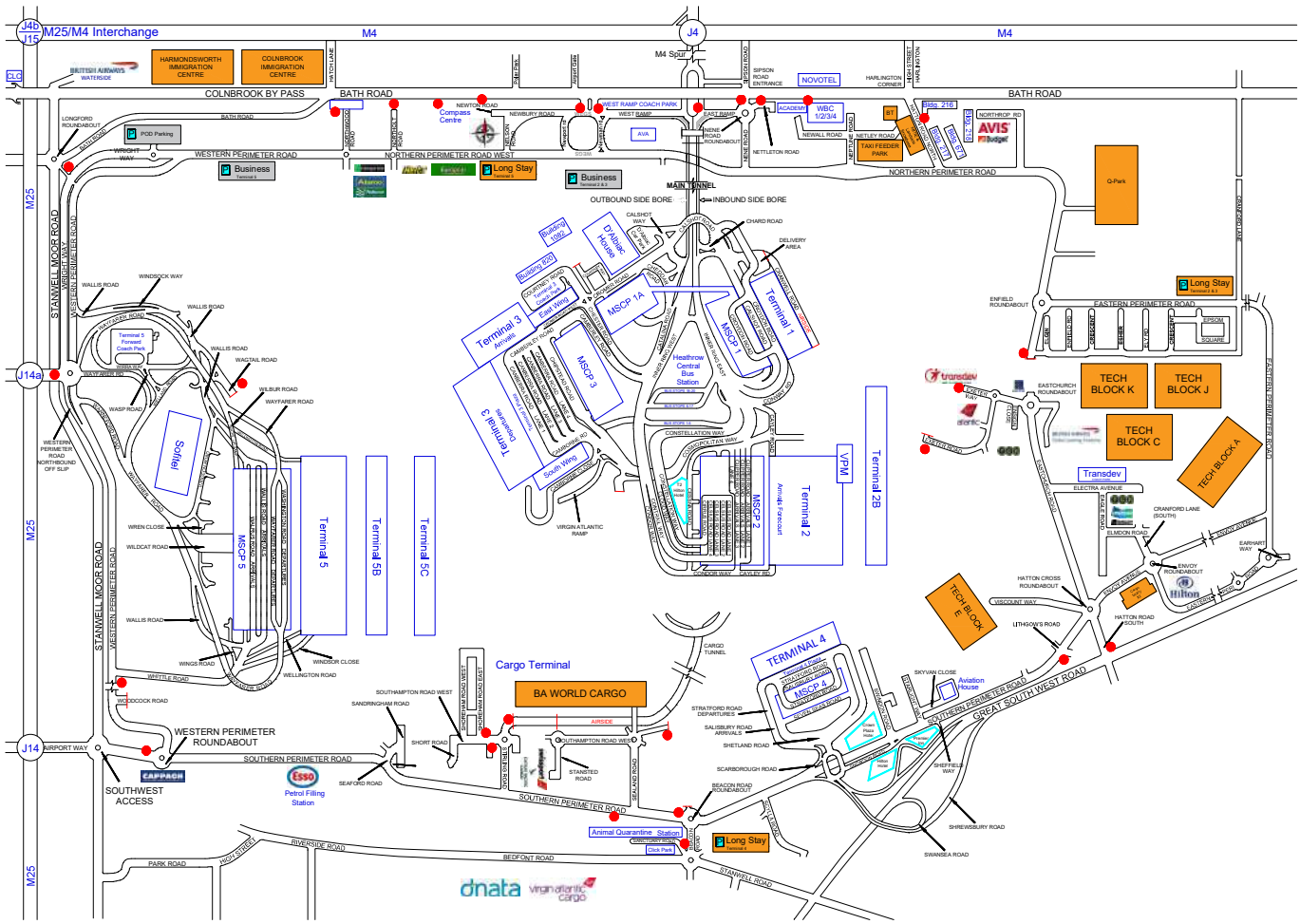
SCHEDULE 2 – PLAN A


Longford
West Bedfont
Terminals
Freehold Titles (owned by Heathrow) AND Leaseholds (Heathrow in occupation)
Leaseholds - 3rd Parties in Occupation
0
0.5 km
1 km
N
ORBITAL WITNESS
Contains OS data © Crown copyright and database rights 2024

SCHEDULE 3 – EMAIL ADDRESSES

1. juststopoil@protonmail.com
2. juststopoilpress@protonmail.com
3. info@juststopoil.org

SCHEDULE 4 – PLAN B



HEATHROW MASTER DRAWING

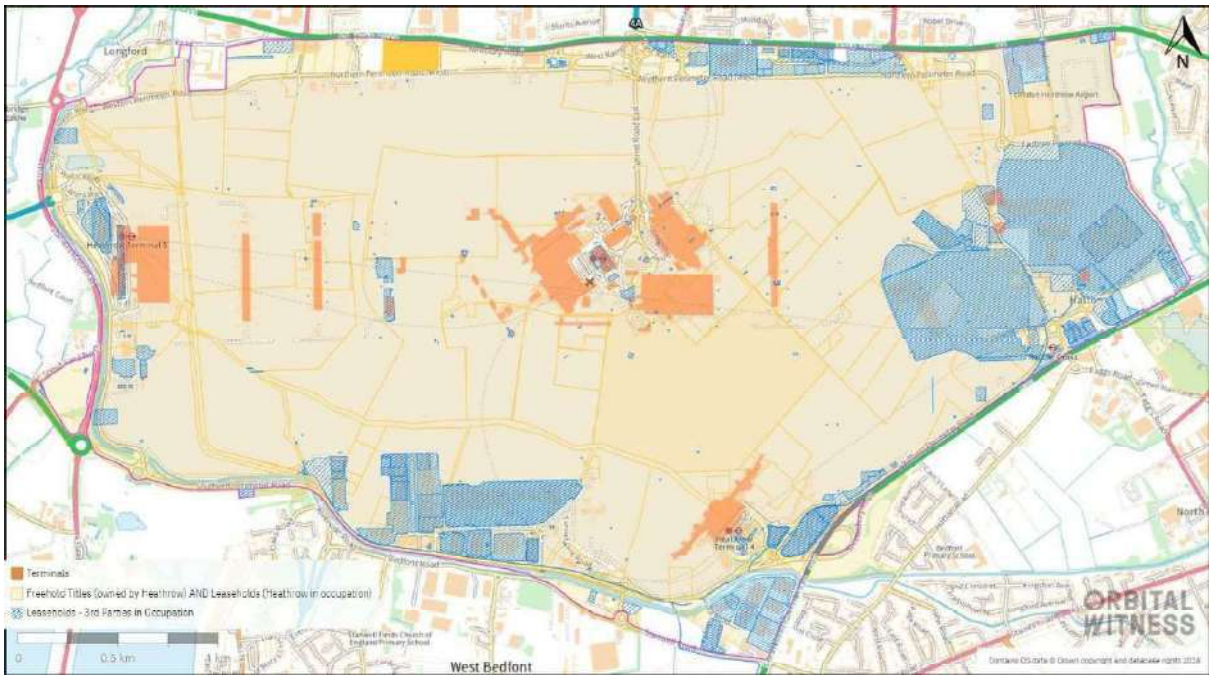
This master drawing is maintained to reflect the current installation at all times. Please notify errors or omissions to the Heathrow Airport LTD Asset Information Team. e-mail: Assetinformation@heathrow.com

SCHEDULE 5 – NOTICE

WARNING – NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted in Claim No KB-2024-002210 granted on 9 July 2024 until 9 July 2029 or final determination of the Claim or further order in the meantime, whichever shall be the earlier, now exists in relation to Heathrow Airport. The injunction means you may NOT without the express consent of HEATHROW AIRPORT LIMITED:

IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN ENTER, OCCUPY OR REMAIN UPON 'LONDON HEATHROW AIRPORT' AS IS SHOWN EDGED PURPLE ON THE PLAN BELOW:



ANYONE BREACHING THE TERMS OF THIS COURT ORDER OR ASSISTING ANY OTHER PERSON IN BREACHING THE TERMS OF THIS ORDER MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE SENT TO PRISON, FINED, OR HAVE THEIR ASSETS SEIZED.

A copy of the legal proceedings (including the Order, Claim Form, Application Notice, evidence in support and a note of the hearing on 9 July 2024) can be viewed at www.heathrow.com/injunction or obtained from:

(1) Compass Centre, Heathrow Airport, Nelson Road, Hounslow TW6 2GW, which is open between 9am-5pm Monday-Friday; or

(2) Bryan Cave Leighton Paisner LLP, Governor's House, 5 Laurence Pountney Hill, London EC4R 0BR (Reference: AMRK/PSPE/20H0904.000140; Telephone: 020 3400 3119).

Anyone notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it affects that person but they must first give the Claimant's solicitors 72 hours' notice of such application. The address of the Court is the Royal Courts of Justice, Strand, London WC2A 2LL.

WARNING

INJUNCTION

THIS AREA IS SUBJECT TO A HIGH COURT INJUNCTION WHICH PLACES RESTRICTIONS ON SOME PROTEST ACTIVITIES. YOU MUST NOT ENTER THIS SITE. BREACH OF THE INJUNCTION COULD LEAD TO IMPRISONMENT.

FOR DETAILS, PLEASE SEE
WWW.TELEDYNE-INJUNCTION.CO.UK
OR FOLLOW THIS QR CODE

Nicholas James Wargent
Claimant
Second Statement
Exhibit NJW-2
19 December 2024

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) 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

SECOND WITNESS STATEMENT OF NICHOLAS JAMES WARGENT

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

1. I am a director of the Claimant, Teledyne UK Limited (**'Teledyne UK'**). Teledyne UK is a wholly owned subsidiary of Teledyne Technologies Incorporated, a New York Stock Exchange listed company (together the **'Teledyne Technologies Group'**). The Teledyne Technologies Group's operations are primarily located in the United States, the United Kingdom, Canada, and Western and Northern Europe.

2. I am also an in-house solicitor and General Counsel for the Europe, Middle East and Africa, and Asia-Pacific regions for the Teledyne Technologies Group, and I am duly authorised to make this witness statement on behalf of Teledyne UK.

3. I make this witness statement to update the Court as to an incident that occurred at the Shipley Site (as defined in the Claim) on 19 December 2024.

4. The facts and matters set out in this statement are within my own knowledge unless otherwise stated, and I believe them to be true. Where I refer to information supplied by others, the source of the information is identified; facts and matters derived from other sources are true to the best of my knowledge and belief. This witness statement has been made following exchanges of emails with Teledyne UK's legal advisers.

5. There is now produced and shown to me a paginated bundle of true copy documents marked **NJW-2**. All references to documents in this statement are to Exhibit **NJW-2**. References are in the format **NJW-2/page number.**

19 December 2024

6. As the Court will be aware, on 19 December 2024 at 2pm, the Application for interim relief was due to be heard; however, upon attending the hearing, the Claimant was informed by the Judge listed to hear the matter that he was required to recuse himself. I am informed by Teledyne UK's legal advisers that counsel informed the Judge that a protest was currently taking place at the Shipley Site, but that the protest was peaceful (which it at that time was). Unfortunately, matters then changed and the protest became aggravated.

7. The account of the protest that I shall give below has been passed to me by the Site Manager at the Shipley Site; I shall refer to them as the 'Site Manager' hereafter. The Site Manager was present at the Shipley Site during the described incident. They have not provided this statement themself because, as the Court will by now be aware, some of the protests experienced by Teledyne UK are aggravated, and Teledyne UK is anxious that its staff should not be unnecessarily exposed to risk of repercussions if their names become known in the public domain.

8. I should add in the interest of full and frank disclosure that some protestors are aware of the identity of the Site Manager at the Shipley Site, as they have given evidence in criminal proceedings in relation to incidents that have occurred at the Shipley Site.

The protest

9. The group known as Bradford Friends of Palestine published a post on Instagram on or around 10 December 2024, asking supporters to assemble at 12 noon on the corner of Acorn Park and Otley Road (that being the main A-Road – the A6038 – from which Acorn Park is accessed). Regrettably, this information had not been passed to me until Tuesday 17th December 2024; therefore, I personally was unaware of this planned protest, and it did not feature in my first witness statement dated 13 December 2024. I now understand from the Site Manager that they saw the post on 10 December 2024. I exhibit at **NJW-2/1** a screen shot of the Instagram post, which has been re-posted since 10 December 2024.

10. I am informed by the Site Manager that they were unsure what form the protest would take; however, as is clear from my first witness statement, recent protests have taken the form of blockades of the Shipley Site (and are apparently now also supported by a group known as the Yorkshire Palestine Collective).

11. As Teledyne UK could not be sure what form the protest would take and given that previous protests have involved a blockade, it was arranged that police officers from West Yorkshire Police would attend the Shipley Site on the morning of 19 December 2024. Whilst the protest was seemingly planned for 12 noon, on a previous occasion (that being 30 October 2024, which I cover in my first witness statement), a protest had been advertised for 12 noon, but the protestors arrived early and blockaded the Shipley Site from 06.30am for five hours. Therefore, an early police presence was arranged. In the event, no early blockade protest occurred on 19 December 2024.

12. I am informed by the Site Manager that approximately eight to twelve protestors assembled either side of the junction of the Otley Road and Acorn Park. The protestors conducted themselves in a lawful manner: they stood on the kerb whilst holding posters and waving Palestinian flags. Police officers were in attendance. The protest then dispersed at around 1:40pm, upon which the police officers also departed. Teledyne UK takes no issue with this lawful protest; the right to protest in this way should be protected, and should not (and will not) fall within the scope of the injunction order that is being sought.

13. I am informed by the Site Manager that at approximately 2pm, a lone male drove his car on to the Shipley Site – he parked his car on the area between the gate to the Site and the highway (he did not drive through the gate, which was closed, but was parked on land that is within Teledyne UK's freehold title). His car had 'FREE GAZA' painted on the side in red paint. I exhibit at **NJW-2/2** a photograph of the parked car.

14. I am further informed by the Site Manager that the lone male unfurled a Palestinian flag, and began shouting pro-Palestinian slogans and abusing Teledyne UK staff with insults such as "murderous bastards". The male then proceeded to play loud Arabic-style music, and he used a steel chain to lock himself to the steering wheel of his vehicle. Officers from the West Yorkshire Police re-attended the site with an 8 minute response time.

15. The male had not hidden the key to the lock on the chain, such that police officers were able to release him from the chain with relative ease. The male was arrested (the Site Manager understands that this was for locking-on offences, breaches of the National Security Act 2023 – the Shipley sites has Facility Security Clearance status, attempted criminal damage and resisting arrest).

16. The vehicle was then removed from the front of the gate by police officers and searched. I am informed by the Site Manager that two zombie style knives were recovered from the car, along with a brand-new sledgehammer. An overnight bag was also recovered from the front passenger seat, which contained personal belongings and cans of red paint.

17. I am informed by the Site Manager that they gave a witness statement to the police, as well as CCTV footage from the Shipley Site.

18. The identity of the male is not yet known. His identity will however be included within the scope of the CPR 31.17 third-party disclosure order sought by Teledyne UK (which I respectfully ask the Court to make on 20 December 2024, to facilitate the addition of this person as a Named Defendant to these injunction proceedings).

19. Throughout the course of the incident involving the lone male and his car, the Shipley Site was locked-down. Fortunately, the quick response of the West Yorkshire Police meant that staff at the Shipley site were only delayed in leaving the site by approximately 40 minutes at the end of the working day.

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.

.....

Nicholas James Wargent
Dated this 19th day of December 2024

IN THE HIGH COURT OF JUSTICE **CLAIM NO. KB-2024-004175**
KING'S BENCH DIVISION

B E T W E E N :

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:

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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

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Defendants

EXHIBIT NJW-2

This is Exhibit NJW-2 referred to in the Second Witness Statement of Nicholas James Wargent.

The Yorkshire Palestin... December 15th, 10:30 pm (10h ago)

THURSDAY 19.12.24. Join @bfdfriendsofpalestine for the big roadside poster parade against Teledyne Shipley. Meeting at 12pm at the corner of Acorn Park & Otley Road, BD17 7SW.

2

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) RUBY HAMILL

(3) DANIEL JONES

(4) NAJAM SHAH

(5) RICKY SOUTHALL

(6) AMAREEN AFZAL

(7) SERENA FENTON

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Defendants

THIRD WITNESS STATEMENT OF NICHOLAS JAMES WARGENT

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

1. I am a director of the Claimant, Teledyne UK Limited (**'Teledyne UK'**). Teledyne UK is a wholly owned subsidiary of Teledyne Technologies Incorporated, a New York Stock Exchange listed company (together the **'Teledyne Technologies Group'**). The Teledyne Technologies Group's operations are primarily located in the United States, the United Kingdom, Canada, and Western and Northern Europe.

2. I am also an in-house solicitor and General Counsel for the Europe, Middle East and Africa, and Asia-Pacific regions for the Teledyne Technologies Group, and I am duly authorised to make this witness statement on behalf of Teledyne UK.

3. I make this witness statement pursuant to paragraph 9 of the Order of Bourne J dated 20 December 2024 (the **'Interim Injunction Order'**), which requires any evidence in support of the continuation of the Interim Injunction Order to be filed by 17 January 2025. I make this witness statement in support of the continuation of the Interim

Injunction Order, and in support of the Application to add further Named Defendants to the Claim.

4. The facts and matters set out in this statement are within my own knowledge unless otherwise stated, and I believe them to be true. Where I refer to information supplied by others, the source of the information is identified; facts and matters derived from other sources are true to the best of my knowledge and belief. This witness statement has been made following exchanges of emails with Teledyne UK's legal advisers.

5. There is now produced and shown to me a paginated bundle of true copy documents marked **NJW-3**. All references to documents in this statement are to Exhibit **NJW-3**. References are in the format **NJW-3/page number.**

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

   (a) An update on matters since my second witness statement dated 19 December 2024;
   (b) The Application to add further Named Defendants to the Claim and the Interim Injunction Order;
   (c) Service of the proceedings, Interim Injunction Order and CPR 31 Orders;
   (d) The need for the continuation of the Interim Injunction Order;
   (e) Directions.

UPDATE

23 September 2024

7. As a result of the initial disclosure received from West Yorkshire Police (which I shall explain further below), an additional incident has come to my attention that I did not cover in my first witness statement dated 13 December 2024. I did not explain that incident as it has not been reported through to our UK Security lead officer (for reasons

of which I am unsure), and I was unaware of it. I have now made enquiries in relation to the incident, and report as follows.

8. In summary, I understand from security staff at Teledyne UK that shortly before 17:00 on 23 September 2024, a female drove onto a premises that neighbours the Shipley Site (the Myers Building and Timber Supplies yard). The yard was due to close at 17:00. I am further informed that the Myers staff were concerned that something untoward was occurring, as the female asked to drive around their yard (which has apparently never happened – vehicles do not drive around the yard), and they followed the female. She was observed to stop alongside the fence that borders the Shipley Site and use a camera phone to film the site. The police disclosure shows that a person (who I assume is female) was later arrested on 25 September 2024. I am informed by Teledyne UK security staff who have been in contact with West Yorkshire Police that four burner phones were recovered, and a no-comment interview was given. The phone used in the incident on 23 September at the Shipley Site was not located. The recovered phones, and the female's laptop, contained evidence that she had undertaken reconnaissance at other similar sites. It is believed that she was undertaking reconnaissance for Palestine Action. I have now viewed CCTV footage of the incident, but unfortunately it shows nothing other than an obscured view of the car, and a Myers employee following it.

9. I have updated the spreadsheet that records the incidents of protest at Teledyne UK's sites to now include that protest (and two others), and exhibit the same at **NJW-3/1 – 4.**

The 19 December 2024 protest at the Shipley Site

10. My second witness statement dated 19 December 2024 described an incident that occurred on the Shipley Site on that day, which took place just as the first hearing at which Teledyne UK sought interim injunctive relief occurred (which hearing, as described in that witness statement, was not effective).

11. West Yorkshire Police have informed Teledyne UK that the individual arrested is known as 'Luke Carter'. He is included within the Application to add further Named Defendants to the Claim and Interim Injunction Order, and West Yorkshire Police have

provided Teledyne UK with an address for Mr Carter within their initial CPR 31 disclosure. Further, West Yorkshire Police have also informed Teledyne UK that Mr Carter has been released on bail, subject to the condition that he is not to approach or enter any Teledyne UK site, and that the alleged locking-on offence will need to be reviewed by the Attorney General.

12. Security staff at the Shipley Site have also provided to me four additional photographs of the incident, which were captured by the security cameras at the site. I exhibit these at **NJW-3/5 – 8**. Three of those images show the car parked across the gates. The fourth image is a long-range shot that shows a male in a grey hooded-jumper stood outside the 'Toolstation' retail unit on Acorn Park. I understand from security staff at the Shipley Site that this is believed to be Mr Carter, and that he was observed visiting both the nearby Screwfix and Toolstation retailers in the hour preceding his actions at the Shipley Site, but that he appeared to leave both retailers empty handed.

Further acts of protest at Teledyne UK sites

13. As I explained at length in my first witness statement dated 13 December 2024, Teledyne UK sought interim injunctive relief in part on the basis that it apprehended further and imminent acts of protest over the Christmas holiday period.

14. I also explained in my first witness statement that a protest, which was expected to be peaceful, had been arranged at the Chelmsford Site for 22 December 2024 (that being the protest that was re-arranged from 8 December, which did not take place because of bad weather). A protest did take place on 22 December 2024, but was instead held on the A1060 'Parkway', and not on Waterhouse Lane (on which the Chelmsford Site is located). The location of the protest was closer to the centre of Chelmsford, and is a main route into the city centre. I do not know why the protest occurred on Parkway and not Waterhouse Lane. The protest did not in any way affect the Chelmsford Site and, to my knowledge, was peaceful; I have viewed a video on the Instagram page hosted by the Chelmsford branch the of the Palestine Solidarity Campaign a, posted on 22 December 2024. That video shows protestors standing on the pavement of the main A-road, holding placards. I exhibit some still images of the video at **NJW-3/9 – 11**. Even if this protest had occurred on Waterhouse Lane outside the Chelmsford Site, it would

not have been captured by the terms of the Interim Injunction Order. As I have repeatedly stated; both Teledyne UK and myself personally respect the important right to protest peacefully, and that right should be protected. Only acts of unlawful protest should be prohibited.

15. On 6 January 2025, the Chelmsford branch of the Palestine Solidarity Campaign also advertised on Instagram a march through Chelmsford that will take place on 8 February 2025, and which will conclude with a series of speeches and a one-minute silence. The advertised route does not pass by the Chelmsford Site. I exhibit a copy of the post at **NJW-3/12**. It again appears that this protest will be peaceful, and Teledyne UK (at this time) takes no issue with the planned protest at all; I mention it only as a point of full and frank disclosure, and for context.

16. Fortunately, there have been no further acts of unlawful protest at any of Teledyne UK's sites since 19 December 2024. As I shall explain below, acts of unlawful protest (taking the form of aggravated trespass) did occur on Christmas Day at a site operated by Elbit Systems Ltd. Whilst it is impossible to prove a negative, I invite the Court to infer, as I do, that the Interim Injunction Order played at least some part in protecting Teledyne UK over the Christmas period.

Christmas Day protest: Elbit Systems Ltd

17. As I explained in my first witness statement dated 13 December 2024, Elbit Systems Limited (**'Elbit'**) is an Israel-based company engaged in defence and security work, and which develops and supplies airborne, land and naval systems). The Palestine Action group often gravitates around the slogan of "shut Elbit down", although it is clear (including from the so-called Underground Manual exhibited to my first witness statement) that the focus and targets of Palestine Action is wider than just Elbit.

18. I understand from Palestine Action's website that on 25 December 2024, at around 12:30pm, protestors used two cherry-pickers to access the walls of the UAV Engines Ltd factory at Shenstone (UAV Engines Ltd is a subsidiary of Elbit, and Palestine Action understand that the factory at Shenstone is involved in the manufacturing of drones that are used in the Gaza conflict). The protestors used demolition tools on the

factory walls and the drivers of the cherry-picker vehicles secured themselves inside the vehicles and used locking-on devices to remain in position. I exhibit a copy of the relevant 'news' article from the Palestine Action website, dated 25 December 2024, at **NJW-3/13 – 14**: https://palestineaction.org/christmas-elbit/.

19. That news item was followed up by a second article dated 27 December 2024, which I exhibit at **NJW-3/15 – 16**: https://palestineaction.org/bryn-remanded/. That article describes how four protestors arrested for the action at Shenstone were released on bail on 26 December 2024, whilst a fifth (named as 'Bryn') was remanded into custody (seemingly as he had targeted the same site in an earlier action on 31 July 2024).

20. Palestine Action covered the Christmas Day action extensively on its social media channels (both in photographs and videos). I have in particular viewed the Instagram page used by the group. I exhibit at **NJW-3/17 – 21** a copy of one of the posts as an example. That post is dated 25 December 2024 and contains several photographs of protestors wearing the familiar red Palestine Action overalls whilst in the buckets of cherry-pickers and using drills and hammers to damage and destroy the factory walls. I also exhibit at **NJW-3/22 – 25** a copy of another post dated 26 December 2024, which contains photographs of a protestor wearing the red Palestine Action overalls in a cherry-picker bucket and using a hammer and chisel to demolish a wall, as well as pictures of the parked cherry-picker vehicle.

21. To my knowledge, neither Elbit (nor its subsidiaries) have sought or obtained injunctive relief that would prohibit such acts, as Teledyne UK have.

Other Palestine Action protests

22. It is clear from Palestine Action's Instagram page that it continues to remain active, and that its supporters engage in unlawful acts of protest generally. For example, the Instagram page contains a post dated 6 January 2025, which documents an incident in which the premises of Elbit's accountants were targeted with spray paint and the smashing of windows (with the post alleging that this was not the first time that the company had been targeted). I exhibit a copy of the post and its photographs at **NJW-3/26 – 28.** By way of further example, the Instagram page also contains a post dated 29

December 2024 in which the premises of 'Leonardo' (another defence and security company) has been spray painted, apparently by activists associated with Palestine Action. I exhibit a copy of the post at **NJW-3/29 – 31.**

CPR 31 Orders

23. As the Court will be aware, Teledyne UK made two applications for disclosure pursuant to CPR 31 and the Senior Courts Act 1981, s34 to obtain the names and addresses of those who were arrested at the Shipley and Wirral Sites (and any relevant evidence in support), so that those persons could be named as Defendants to the proceedings. These Applications were prepared with the co-operation of the relevant police forces, and the Draft Orders were jointly produced. The Applications were included in the bundle used at the hearing on 20 December 2024, at which the Interim Injunction Order was granted.

24. Bourne J made the Order in relation to the Shipley Site (to which the Chief Constable of West Yorkshire Police was the Respondent) at the hearing. As the Application in relation to the Wirral Site (to which the Chief Constable of Merseyside Police is the Respondent) had not yet been processed on the Court file (as it was filed after the other Application), this was dealt with by Bourne J on the papers shortly after the hearing. Sealed copies of all three Orders (the Interim Injunction Order and the two disclosure Orders) were received on 20 December 2024. I understand from Teledyne UK's legal advisers that these Orders will be included within the hearing bundle to be used on 24 January 2025.

25. Later on 20 December 2024, Teledyne UK's legal advisers received from the Court a further sealed copy of an Order made in relation to the Wirral Site. The Order was made by Johnson J, and will also be included with the hearing bundle for the return date. I assume that the Court did not realise that Bourne J had already made the Order earlier in the day. It appears to me that the Orders are identical in terms, save that the Order of Johnson J included an additional paragraph (paragraph 6), giving liberty to apply. As I shall explain later in this statement, both the Bourne J and the Johnson J Order have been served.

26. When serving the disclosure Orders, Teledyne UK's legal advisers advised the relevant police forces of the return date listing, and the need for evidence in support to be filed by 17 January 2025. The police forces were asked to provide the names and addresses of the arrestees as a matter of priority, with the further evidence to follow (which, under the terms of the disclosure Orders, must be provided by 28 February 2025).

27. As I shall explain below, on 10 January 2025, Merseyside Police provided the names and addresses of the six people arrested at the Wirral Site on 5 July 2024 and 2 October 2024. Teledyne UK now applies to add these six persons as Named Defendants to both the Claim and the Interim Injunction Order.

28. On 13 January 2025, West Yorkshire Police confirmed the names of the First to Seventh Defendants, and Luke Carter (the proposed Eighteenth Defendant), and provided addresses for each.

APPLICATION TO ADD FURTHER NAMED DEFENDANTS

29. Following the initial disclosure from Merseyside Police, Teledyne UK applies to add the following persons as Named Defendants to the Claim, and include them within the scope of the Interim Injunction Order at the return date hearing:

    (a) Defendant 12 – **Cheryl Leanaghan**;
    (b) Defendant 13 – **Mais Robinson**;
    (c) Defendant 14 – **Autumn Taylor-Ward**;
    (d) Defendant 15 – **Annabella Barringer**;
    (e) Defendant 16 – **Lara Downes**;
    (f) Defendant 17 – **Gabrielle Middleton**.

30. Addresses and dates of birth have been provided by Merseyside Police for each of these persons, which I will not include within this statement. Based on the information with which Teledyne UK has been provided, it appears that each of these persons is over the age of 18. Each of these persons was arrested at the Wirral Site on either 5 July 2024 or 2 October 2024 in relation to the protest incidents that occurred on those dates (as described in my first witness statement). The initial disclosure from Merseyside Police

does not make it clear which Defendant was arrested on which day (but it is known that three persons were arrested on each of the two days); further details will follow in the full police disclosure.

31. Further, by reason of his actions at the Shipley Site on 19 December 2024, Teledyne UK applies to add **Luke Carter** to both the Claim and the scope of the Interim Injunction Order as Defendant 18.

SERVICE

32. Paragraph 3 of the Interim Injunction Order permits the alternative service of the documents in this Claim, including the Interim Injunction Order itself.

33. As to paragraph 3(i), the relevant webpage can be found here: https://www.teledyne-injunction.co.uk. The webpage went live on 20 December 2024. I note that the link is the first Google search returned if "Teledyne Injunction" is used as a search term. A link to the webpage is included on the homepage of the main Teledyne UK website – with the relevant linked text reading "Notice of Injunction".

34. As to paragraph 3(ii), I am informed by Teledyne UK's legal advisers that:

(a) Prior to the hearing on 20 December 2024, the Claim Form, Application Notice and all evidence in support of the Claim and Application were sent to the email addresses set out in paragraph 3(ii);

(b) On 20 December 2024, copies of the Interim Injunction Order, and the three disclosure orders were sent to the email addresses set out in paragraph 3(ii). That email also included a link to the webpage set up in accordance with paragraph 3(i); and

(c) On 13 January 2025, further copies of the Interim Injunction Order, Claim Form, Application Notice, and all evidence in support of the Claim and Application were sent to the email addresses set out in paragraph 3(ii) by way of a reminder (and to ensure that the Claim Form, Application Notice and all

evidence in support of the Claim and Application had in fact been properly served following the making of the alternative service order).

35. The signs required by paragraph 3(iv) of the Interim Injunction Order were erected at all six sites. The signs were erected at the Wirral, Shipley, Presteigne and Lincoln Sites on 20 December 2024 (in relation to the latter, these were temporary laminated copies, which have since been replaced by the permanent signage). Large signs were erected at the entrances to the Chelmsford Site on 20 December 2024, with further perimeter signage being added on 23 December 2024. The signs were erected at the Newbury Site on 23 December 2024. I exhibit at **NJW-3/32 – 38** a plan of each of the six Teledyne UK sites that are the subject matter of this injunction, on which the perimeter of the sites and the location of the erected signs are marked. Further, by way of example of a sign in situ, I exhibit at **NJW-3/39** a photograph of one of the signs attached to the front gates of the Chelmsford Site.

36. As to paragraph 3(iii), Teledyne UK only came into possession of the addresses of the First to Seventh Defendants on 13 January 2025, after the initial CPR 31 disclosure by West Yorkshire Police. I am informed by Teledyne UK's legal advisers that these Defendants will be served with all of the existing documents in the Claim, as well as with the documents for the return date hearing, by first-class post this week.

37. Further, the Application to add the further Named Defendants, as well as all documents in this Claim (including the Interim Injunction Order) will be sent by first-class post to those persons who Teledyne UK is applying to add as Named Defendants.

38. I am informed by Teledyne UK's legal advisers that the relevant certificates of service will be included within the hearing bundle for the return date.

THE NEED TO CONTINUE THE INTERIM RELIEF

39. In support of the need for the continuation of the Interim Injunction Order, Teledyne UK continues to rely on the evidence set out in my first and second witness statements, as well as the first witness statement of Manan Singh dated 13 December 2024, all of

which explain why injunctive relief is required at this time and prior to any final determination of the Claim.

40. As I have set out above, the group known as Palestine Action remains active, and its followers continue to engage in unlawful direct action protest. As such, Teledyne UK continues to apprehend that, absent injunctive relief, it will suffer further acts of unlawful protest at its sites, and resulting harm. The incident on 19 December 2024 at the Shipley Site shows that Teledyne UK's apprehension is clearly well-founded.

41. It is notable that Elbit, which does not have the benefit of injunctive relief, suffered the aggravated trespass incident on Christmas Day; I invite the Court to infer that the Interim Injunction Order, at least in part, acted as a deterrent to unlawful activity at Teledyne UK's sites over the Christmas period. Indeed, since the grant of the Interim Injunction Order, no further unlawful acts of protest have been experienced at Teledyne UK's sites, that is despite the upward trajectory of incidents occurring towards the end of 2024, especially at the Shipley Site; I again invite the Court to draw the inference that the Interim Injunction Order has a deterring effect on the commission of unlawful acts of protest by activists.

42. Further, it is notable that, whilst the only protest of which Teledyne UK currently has intelligence is expected to be peaceful (that being the march in Chelmsford), the protest at the Shipley Site on 19 December 2024 began as a peaceful protest, before one lone-protestor (Mr Carter) undertook unlawful acts.

43. It is clear that Palestine Action continues to encourage its followers to engage in unlawful acts of protest (remembering that Teledyne UK is listed as a target on both the group's website and in its so-called Underground Manual), and that it intends for unlawful direct action protest to be continued into 2025. For example:

    (a) I exhibit at **NJW-3/40** a copy of the homepage of the Palestine Action website, accessed on 13 January 2025. That webpage shows that the group is still recruiting new activists, as the application form to 'Join Palestine Action' appears on the homepage (as well as on the 'Join the Resistance' page). Three direct action training days are advertised on the homepage. Additional training

days and online 'crash courses' on direct action are advertised on the 'Training Days' page of the website (https://palestineaction.org/training/), exhibited at **NJW-3/41**;

(b) On 31 December 2024, Palestine Action posted to its Instagram page a promotional video, with the accompanying text: "*2024 was our most intense year of direct action against Israel's biggest weapons producer yet. Palestine Action blockaded, occupied and destroyed Elbit's factories, whilst also targeting their whole supply chain. Join us in 2025 to chase Israel's war machine out of Britain for good!".* I exhibit a copy of the post at **NJW-3/42.**

44. Teledyne UK therefore continues to apprehend, absent injunctive relief, further and imminent acts of unlawful direct action and resulting harm at its six sites advertised as targets by Palestine Action.

Persons Unknown: the Order sought

45. As explained in Mr Singh's first witness statement and counsel's skeleton argument for the hearing on 20 December 2024, Teledyne UK seeks at this return date hearing a five-year order against Persons Unknown, subject to an annual review. Accordingly, any final hearing in this Claim will relate only to the Named Defendants. I understand that counsel will address the Court at the return date hearing as to why this is the proper order to make in the circumstances of this case.

46. In the alternative, Teledyne UK limited seeks a continuation of the Interim Injunction Order as against Persons Unknown until the final hearing of the Claim against the Named Defendants, at which time the five-year order with an annual review will be sought. However, I should say that, in the interests of furthering the overriding objective, Teledyne UK is hoping to resolve these proceedings by way of the Named

Defendants giving undertakings to the Court, in which case no such final hearing in relation to the Named Defendants would be required.

DIRECTIONS

47. I understand that the appropriate directions in these proceedings is a matter for submissions at the return date hearing. Therefore, I only here respectfully ask the Court to consider that Teledyne UK is not yet in receipt of the full police disclosure, such that it is not yet in a position to put that evidence before the Court in advance of a final hearing.

48. Further, as the addresses of the First to Seventh and Eighteenth Defendants, and the identities and addresses of the Twelfth to Seventeenth Defendants, has only become know this week, further time is needed to allow important steps in these proceedings to occur. In particular, the Named Defendants shall now be served by first-class post, and may require time to consider those documents and whether they wish to defend the proceedings (that is especially the case for the Twelfth to Eighteenth Defendants, who have not yet been served with any documents in the Claim by way of the alternative service order). Further, it would be usual in a case such as this to attempt to settle the proceedings with the Named Defendants by way of them offering undertakings to the Court; Teledyne UK intends to explore this avenue with the Named Defendants, once they have been served and have had an opportunity to consider their position.

49. Accordingly, I respectfully ask that Teledyne UK is given a window of time following the receipt of the police disclosure to both explore the possibility of undertakings with the Named Defendants, and then assemble any trial evidence should any Named Defendant not be willing to give an undertaking.

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.

.....
Nicholas James Wargent
Dated this 15th day of January 2025

IN THE HIGH COURT OF JUSTICE **CLAIM NO. KB-2024-004175**
KING'S BENCH DIVISION

B E T W E E N :

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

EXHIBIT NJW-3

This is Exhibit NJW-3 referred to in the Third Witness Statement of Nicholas James Wargent.

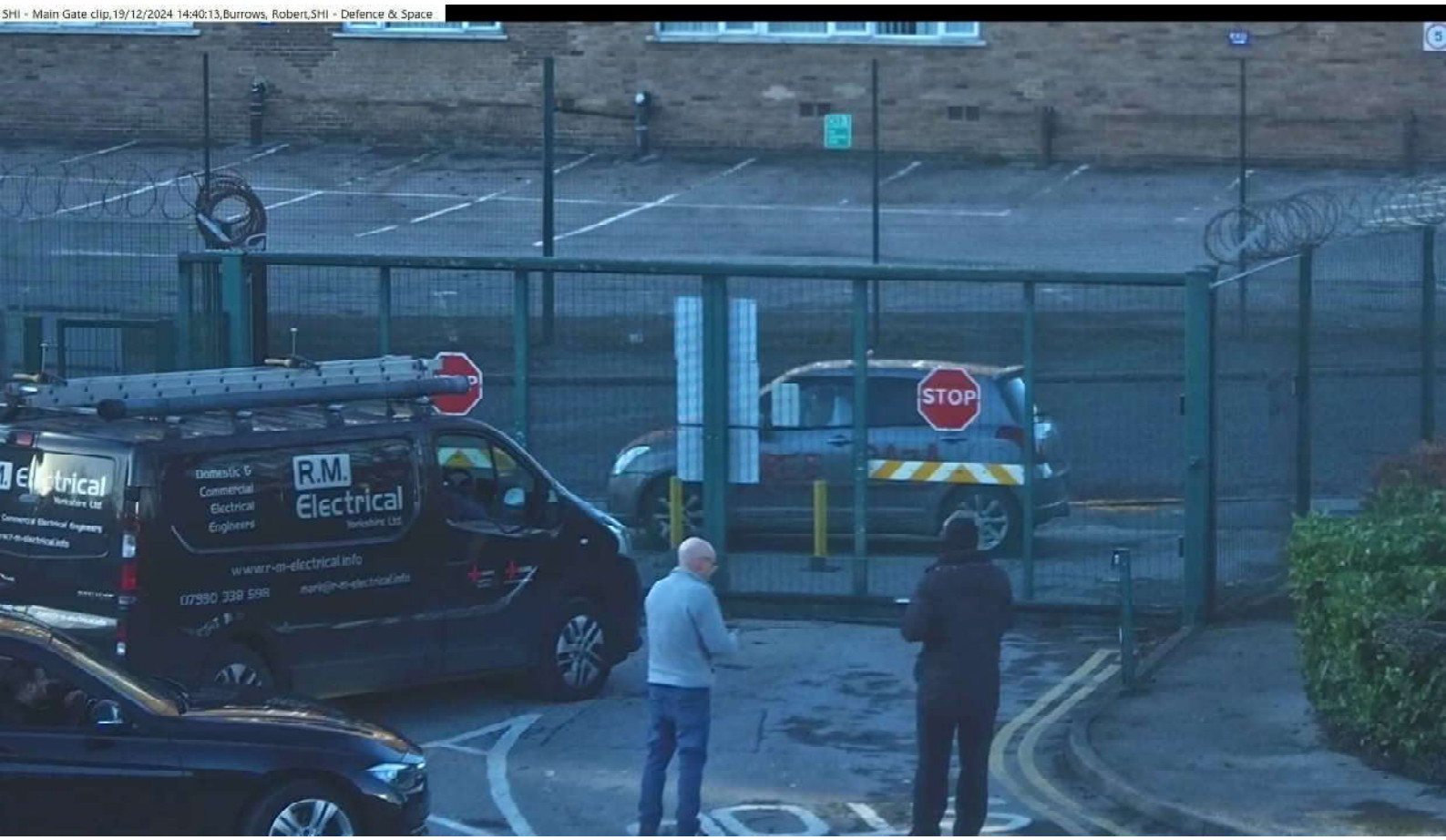
Teledyne UK - attacks and demonstrations 2022 - 2024								
Date	**Location**	**Duration**	**Group**	**Approx numbers**	**Police attendance**	**Tactics seen**	**Remarks**	**Subsequent Action**
09-Dec-22	**Labtech Presteigne**	**5-6 hours**	**Palestine Action**	**4**	**Yes. Large police response.**	**Accessed reception. Sledgehammers used to break glass and destroy IT equipment. Ladders used to scale roof. Damage to roof and production area.**	**Police at heights team and Fire Service removed and arrested protesters from roof.**	**4 protestors held in prison on remand pending trial. Trial held 9-12 May 2023. [redacted] changed plea to guilty. Sentenced to 23 months imprisonment. [redacted] found guilty. Sentenced to 27 months imprisonment.**
28-Sep-23	**Te2v Chelmsford**	**Minutes**	**Palestine Action**	**1**	**No.**	**Red paint splashed across front wall.**	**Photographer present.**	**Police did not respond - led to subsequent calls with an Essex Detective Chief Inspector. Photo of TDY employee on national press website: taken down on request.**
23-Nov-23	TDS Shipley	1-2hrs	Bradford Friends of Palestine	10	Yes immediate 4 Officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
07-Dec-23	TDS Shipley	1-2hrs	Bradford Friends of Palestine	30	Yes immediate +6 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
19-Dec-23	TDS Shipley	1-2hrs	Bradford Friends of Palestine	120	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
26-Dec-23	**TDS Shipley**	**Minutes**	**Unknown**	**2**	**Yes immediate approx 10 officers**		**Arson attack. No injuries. Minor damage to goods inward area.**	**Suspect arrested September 2024. Thought to be a local, not part of a group. The CPS decided not to charge: evidence not strong enough.**
04-Jan-24	TDS Shipley	1-2hrs	Bradford Friends of Palestine	120	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
18-Jan-24	TDS Shipley	1-2 hrs	Bradford Friends of Palestine	45	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
25-Jan-24	TDS Shipley	1-2hrs	Bradford Friends of Palestine	40	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
08-Feb-24	TDS Shipley	1-2hrs	Bradford Friends of Palestine	15	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
14-Feb-24	TDS Shipley	1-2hrs	Bradford Friends of Palestine	60	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
16-Feb-24	CML Bromborough	1-2 hrs	Palestine Action Liverpool	10	Yes - 1 vehicle 2 Officers	Blocking entrances but allowing employee access trying to hand out leaflets	Not believed to be linked to Palestine Action Group. peaceful banners and posters and handing out leaflets	
29-Feb-24	TDS Shipley	1-2hrs	Bradford Friends of Palestine	20	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
06-Mar-24	CML Bromborough	1-2hrs	Palestine Action Liverpool	20	Yes immediate 1 vehicle 6 Officers	Blocking entrances trying to hand out leaflets. Possible that as all police/security resource arrives they disperse, thus costing Police and site extra cost.	Peaceful, blocking entrance gates, displaying banners handing out leaflets	

Teledyne UK - attacks and demonstrations 2022 - 2024								
Date	**Location**	**Duration**	**Group**	**Approx numbers**	**Police attendance**	**Tactics seen**	**Remarks**	**Subsequent Action**
06-Mar-24	Labtech Presteigne	1-2 hrs	Radnor Palestine Links	25	No.	Blocking vehicle gate and handing in a letter	Peaceful. Handing over a letter demanding to speak to management. Subsequent piece in press. Two individuals with known links to PAG and previous protests/damage etc	
15-Mar-24	CML Bromborough	1-2hrs	Palestine Action Liverpool	20	Yes immediate approx 8 officers	Blocking entrances, handing out leaflets	Peaceful, blocking entrance gates, displaying banners handing out leaflets	
18-Mar-24	CML Bromborough	1.5 hrs	Palestine Action Liverpool	20	1 police officer	Blocking entrances but allowing employee entry	As previous. Banners leaflets standing at entrance points	
20-Mar-24	TDS Shipley		Bradford Friends of Palestine	60	5 Police, 2 vehicles in attendance prior to protest	Stood in front of vehicle gates but allowed access	Peaceful displaying banners (pro Palestine/anti Teledyne) 1 protester taking a lot of footage of the site buildings and perimeter. Assessed to be hostile recon. Speaker units and microphone in use (unknown what was said) 2 protesters praying at gate during protests (not seen before). Unite union flags in attendance.	
23-Mar-24	CML Bromborough	45mins	Palestine Action Liverpool	60	1 police vehicle 2 officers	Blocking entrances but allowing employee entry	As previous. Banners leaflets standing at entrance points. No employees required access/exit	
27-Mar-24	Labtech Presteigne	2hrs	Radnor Palestine Links	18	No police	Stood in front of vehicle gates, handed letter to site	Banners, leaflets etc	
02-Apr-24	**TDS Shipley**	**Approx 16hrs**	**Palestine Action Liverpool**	**4 on roof + 20 outside**	**All emergency services in numbers**	**On roof, smashing roof tiles, brickwork, windows etc**	**Eventually arrested and removed. Significant damage to building. Costs estimated at c£700k**	**Daniel Jones & Najam Shah released from custody after 1 week. Ruby Hamill released from custody 2 May. Julian (aka Laila) Gao remained in custody until June. Trial 5-13 Sept 2024. Hung jury. Retrial set for 9 February 2026.**
04-Apr-24	Labtech Presteigne	10 mins	Local councillor and ex mayor	1	No police	Handed letter to site	Nothing further	
09-Apr-24	TDS Shipley	2hrs	Bradford friends of Palestine	20-25	6 Officers	Blocking entrances but allowing ingress egress	Banners, leaflets and speakers	
10-Apr-24	CML Bromborough	1hr	Palestine Action Liverpool	approx 8	No police	Stood in front of entrances but allowed access	Banners, leaflets, chanting	
17-Apr-24	CML Bromborough	1hr	Palestine Action Liverpool	10	No Police	Stood in front of gates allowing access	Banners, leaflets, chanting	
21-Apr-24	E2V Tech Lincoln	30mins	Unknown	3	No police	Damage caused to perimeter fence/gate	No entry onto site, damage repaired following day	
23-Apr-24	E2V Tech Lincoln	10mins	Unknown	1	No Police	1 individual seen early hours inspecting repaired fence and gate	Police informed, images captured	
24-Apr-24	TDS Shipley	2hrs	Bradford Friends of Palestine	30	8 officers	Slow march on approach road, standing in front of gates	Banners, chanting, hands covered in red paint	
11-May-24	**Cumbernauld**	**15mins**	**Unknown**	**4**	**No response requested**	**4 individuals smashing windows and spraying paint. Did not enter building**	**Red paint, sledgehammers. Not assessed to be PA**	
12-May-24	Cumbernauld	20 mins	Unknown	1	Reported to Police	1 person taking photos of damaged windows	Reported to Police, they are investigating. Teledyne security investigation found that the individual was an employee but had failed to notify the control room of their visit out of hours. Employee educated and Police informed	

Teledyne UK - attacks and demonstrations 2022 - 2024								
Date	**Location**	**Duration**	**Group**	**Approx numbers**	**Police attendance**	**Tactics seen**	**Remarks**	**Subsequent Action**
13-May-24	Cumbernauld	5-10 mins	Unknown	2	Reported to Police and response initiated	2 individuals walking along two aspects of the building	Police responded. No feedback from them due to investigation.	
15-May-24	**TDS Shipley**	**7 hrs**	**Palestine Action group**	**4 (3 female, 1 Male)**	**Large emergency services response**	**4 individuals gained access to reception roof and smashed roof and windows. Access to site was via a ladder against the fence. CCTV alarms activated and response called.**	**Police at heights team and fire service removed and arrested protesters from roof. Supporting demonstrators were held by Police at entrance to the industrial estate to prevent support to roof top protesters**	**Ricky Southall, Amareen Afzal, Serena Fenton released on police bail [redacted] in custody (has also attacked Barclays bank)**
07-Jun-24	CML Bromborough	10mins	Unknown	1 male	Nil	1 individual cut through fence and walked through site	Police informed, images captured	
21-Jun-24	CML Bromborough	1.5hrs	Palestine Action Liverpool	15	Large police presence	Stood in front of gates allowing access	Banners, leaflets, chanting	
21-Jun-24	CML Bromborough	10 mins	Unknown	1 male	Nil	Appears to have cut through fence and walked off site	Police informed, images captured	
05-Jul-24	**CML Bromborough**	**4 hrs**	**Palestine Action Liverpool**	**3 females**	**Large Police presence**	**3 individuals attempted to scale ladder to roof. After failing this, they rammed the vehicle gates with a van and proceeded to spray paint over the building whilst live streaming**	**Police arrested 3 protestors. All 3 released on bail. We await court dates**	
07-Aug-14	TDS Shipley	2 hrs	Bradford Friends of Palestine	Approx 20	Large Police presence	Standing in front of gates, chanting and singing	Banners, speakers etc	
18-Sep-24	**TDS Shipley**	**2 hrs**	**Bradford Friends of Palestine**	**Approx 30**	**Large Police presence**	**Standing in front of gates, chanting and singing**	**Banners, speakers etc. One individual carried a mask of [redacted]**	**Mask-wearer arrested, charged with a public order offence and bailed. Plea hearing 18 October 2024.**
23-Sep-24	**TDS Shipley**	**Aprrox 10 minutes**	**Individual - Palestine Action links**	**1 female**	**Not at the time**	**Adjoining property Myers building yard report a person driving into their yard and park alongside the shared fence to the TDY site. Myers CCTV review shows the driver arrive at main gate at 16:50 and drive into the yard looking around, they reverse and leave. The car returns at 16:53 and asks Myers staff if they can reverse around. Instead of reversing the car drives forwards and stops facing the TDY site. Individual uses a camera phone to film site. They then film Myers yard and then drive slowly to the far end of the yard. 16:55 The driver stops alongside the Teledyne shared fence and films the TDY site from 10ft away, then drives away at 1656.**	**Red Fiesta YB63KCC, one female occurpant. Reported on 101 as hostile reconnaissance against section 4 National Security Act. Crime ref 13240522712 / WYP-20240924-0741.**	**We understand from West Yorks police that the individual was arrested with four burner phones, incriminating hostile recon evidence of other locations on her phones and laptop but the phone seen on 23rd was not located. Individual is a regular at protests at the Shipley site with links to Palestine Action. The Police believe she passed the Teledyne recon phone onto Palestine Action before arrest. She gave no comment interview, then released on bail. Update from 28th Dec - CID and CPS are still deciding on next steps.**
02-Oct-24	**CML Bromborough**	**5hrs**	**Palestine Action Liverpool**	**2 males 2 females (1 male, driving the van, left immediately on electric scooter).**	**Large Police response**	**Climbed onto roof via ladder sealed in van, smashed roof and damaged production floor and clean room**	**Police arrested 3 individuals. We await court dates.**	**3 protestors released on police bail.**
30-Oct-24	TDS Shipley	5 hrs approx	Bradford Friends of Palestine	Approx 35	Immediate Police response	Standing in front of gates, chanting and singing	Originally planned for 12pm arrived at 0630hrs, banners, speakers etc	
20-Nov-24	**TDS Shipley**	**2hrs**	**Bradford Friends of Palestine**	**Approx 12**	**Police on scene**	**Standing in front of gates, chanting, singing and dancing**	**Police on scene preventing photography**	

Teledyne UK - attacks and demonstrations 2022 - 2024								
Date	**Location**	**Duration**	**Group**	**Approx numbers**	**Police attendance**	**Tactics seen**	**Remarks**	**Subsequent Action**
28-Nov-24	TDS Shipley	3 hrs	Bradford Friends of Palestine	Approx 20	Police on scene prior	Initially in front of gates, Police eventually moved them across the road to allow employee access	Police on scene throughout, prevented photography	
08-Dec-24	e2v Chelmsford	N/A	Chelmsford Palestine Solidarity Campaign	n/a	Nil	Social media posted for a protest outside 1130-1330hrs 8 Dec 24. A further post was made postponing the event until 22 Dec 24	No protest took place, due to adverse weather	
19-Dec-24	**TDS Shipley**	**3 hrs approx**	**Bradford Friends of Palestine**	**Approx 17**	**Police attended both protest and subsequent lock-on attempt**	**Poster published on Bradford Friends of Palestine's Instagram account calling for a protest from 12 noon. Initial peaceful protest at top of Acorn Road. Protestors with posters and flags standing on the kerb of the pavement. Subsequent "lock-on" attempt by an individual who drove car in front of main gate.**	**Police attended site early in the morning in anticipation of an early morning blockade. None materialised. The protestors assembled at 1205 on both sides of the junction onto Acorn Park. Police in attendance. They finished at 1340 and dispersed. The police also departed. At 1437 an individual drove his car onto Teledyne property. He stopped in front of the main gate, unfurled a Palestine flag and shouted pro-Palestine slogans and insults towards Teledyne's staff. He then used a steel chain to lock himself to the steering wheel. Police arrived, removed the individual from the car and arrested him.**	**The vehicle was searched by the police who seized 2 x zombie-style knives, a brand new sledgehammer, a box of flares, small hammer, red paint and overnight bag of belongings. W York police subsequently informed us that the individual (Luke Carter) has been bailed. He had no previous arrests and no national intelligence recorded. Bail conditions not to approach / enter any Teledyne site across the UK.**
22-Dec-24	e2v Chelmsford		Chelmsford Palestine Solidarity Campaign	25+	Not known	No protest at Teledyne site. Protest instead held on Parkway, some distance from the site.		

TOOLSTATION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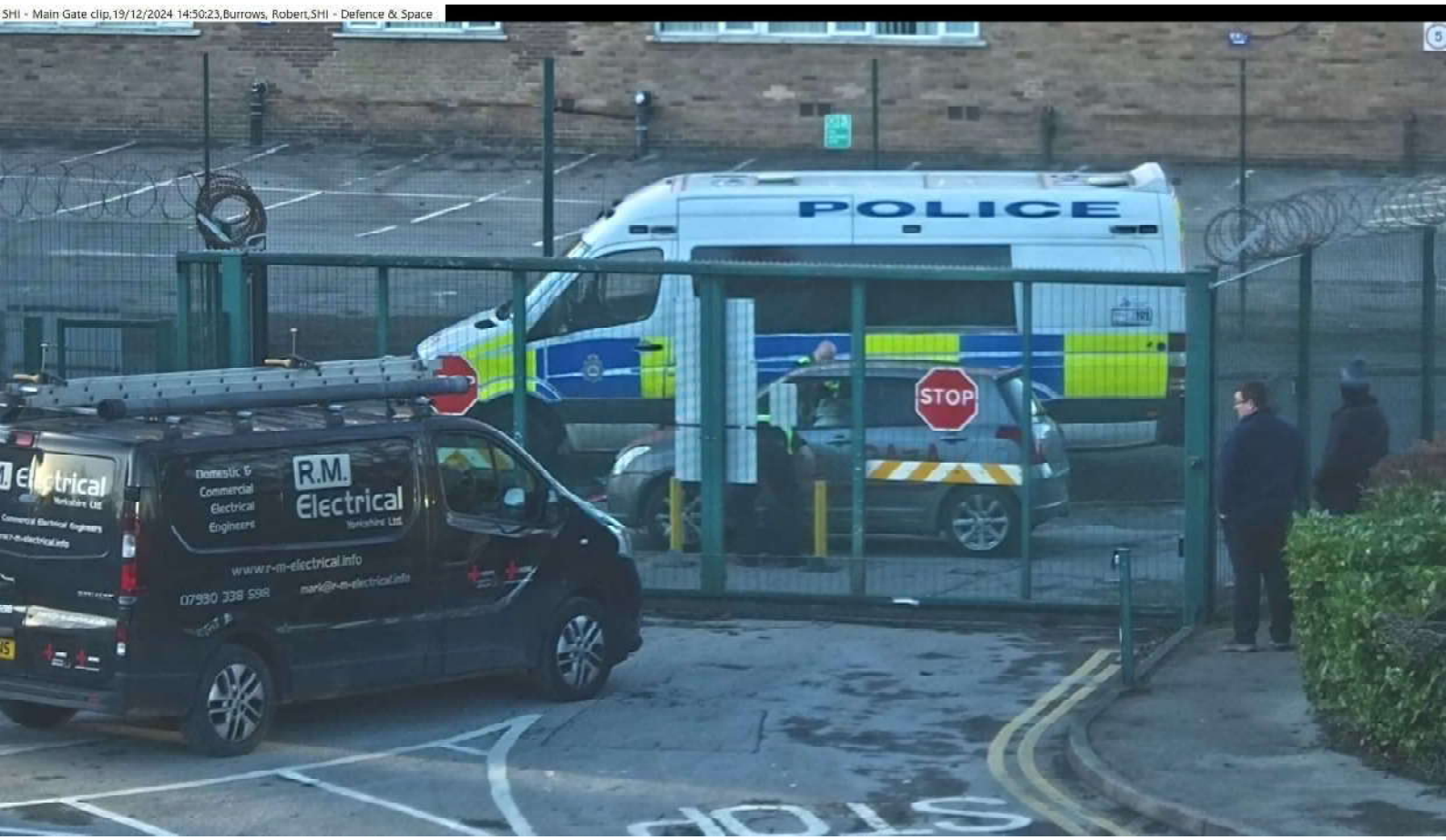
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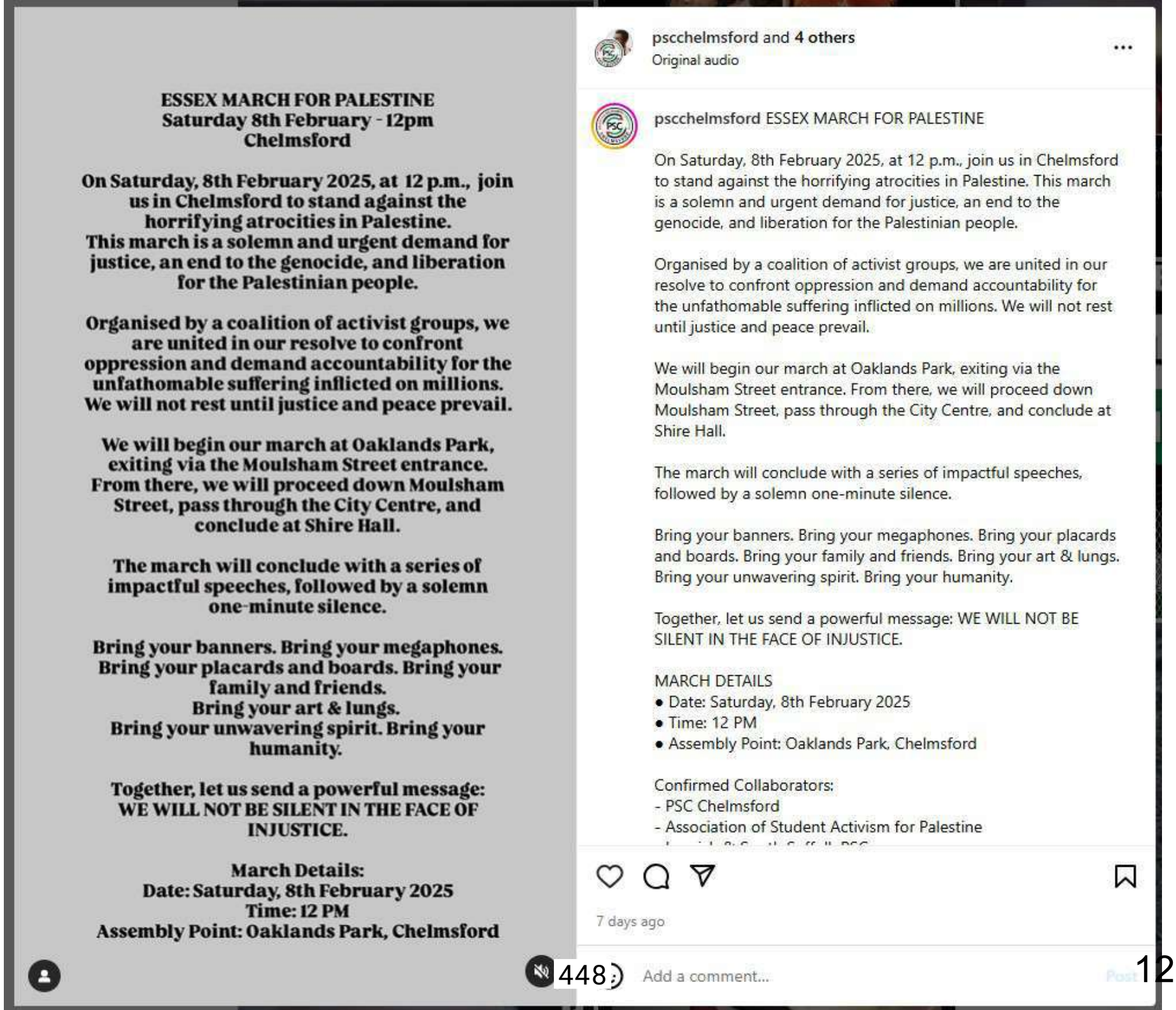
ESSEX MARCH FOR PALESTINE
Saturday 8th February - 12pm
Chelmsford
On Saturday, 8th February 2025, at 12 p.m., join us in Chelmsford to stand against the horrifying atrocities in Palestine.
This march is a solemn and urgent demand for justice, an end to the genocide, and liberation for the Palestinian people.
Organised by a coalition of activist groups, we are united in our resolve to confront oppression and demand accountability for the unfathomable suffering inflicted on millions.
We will not rest until justice and peace prevail.
We will begin our march at Oaklands Park, exiting via the Moulsham Street entrance.
From there, we will proceed down Moulsham Street, pass through the City Centre, and conclude at Shire Hall.
The march will conclude with a series of impactful speeches, followed by a solemn one-minute silence.
Bring your banners. Bring your megaphones.
Bring your placards and boards. Bring your family and friends.
Bring your art & lungs.
Bring your unwavering spirit. Bring your humanity.
Together, let us send a powerful message:
WE WILL NOT BE SILENT IN THE FACE OF INJUSTICE.
March Details:
Date: Saturday, 8th February 2025
Time: 12 PM
Assembly Point: Oaklands Park, Chelmsford
pscchelmsford and 4 others
Original audio
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Confirmed Collaborators:
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- Association of Student Activism for Palestine
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448
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On Christmas Day, Palestine Action Break the Walls of Elbit's UAV Engines Shenstone Drone Factory

Dec 25, 2024 | 0 comments

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From 12.30PM on Christmas day, Palestine Action begun breaking through the walls of Elbit's UAV Engines' (UEL) Shenstone drone factory. Palestine Action have repeatedly targeted the Lynn Lane production site, and today, from within two buckets attached to two cherry pickers, a dedicated team of activists are using demolition tools to target the factory walls. The drivers have secured themselves inside the two vehicles, using lock-ons to remain in position, allowing more time to put the Israeli weapons maker out of commission.

Israel's largest weapons firm, Elbit Systems, use the Staffordshire site to design and manufacture *Wankel*-type rotary engines, which have been used to power Israel's Hermes killer drone fleet, bringing misery and death to the children of Gaza, to whom the 'Season of Goodwill' does not extend. In addition to producing engines for Elbit's 450 drone, the UEL AR731 rotary engines produced at Shenstone, are also used in the Israeli Aerospace Industries (IMI) Harop Kamikase drone, which is currently being upgraded to kill autonomously.

Whilst UAV Engines routinely obfuscate their involvement in supplying arms to Israel, in line with their non-disclosure agreement with the Israeli military, export licenses show the company send drone parts to Israel with the 'end-user' listed as the 'State of Israel'.

Today's action takes place, not only in the context of the Gaza Genocide, and with the birthplace of Christmas under occupation, but with a climate of state terror in Britain, being used to try and intimidate protestors. These tactics include dawn raids, detention under supposed anti-terror laws, and days of questioning. On Christmas Eve, Palestine Action already had 22 political prisoners behind bars, almost all of whom are still unconvicted, and none of whom are charged with terrorist offences.

A Palestine Action spokesperson said:

"Despite state tactics to deter Palestine Action, we remain more determined than ever to bring an end to the British presence of Israel's largest weapons firm, Elbit Systems. By breaking the walls of an Israeli weapons factory today, we are standing with the Palestinian people who remain occupied and under Israeli bombardment on Christmas day. Brick by brick, wall by wall, Israel's weapons trade will fall."

ENDS

NOTES TO EDITORS

If you would like any further information on Palestine action, please contact media@palestineaction.org

Palestine Action is a direct-action network of groups and individuals formed with the mandate of taking direct action against Elbit Systems' UK locations at grassroots level, calling for them all to be shut down and for the British government to end its complicity in Israeli apartheid.

← Judge Keeps Unconvicted Palestine Action Prisoner, Francesca Nadin, Locked-Up Over Christmas

Palestine Action Activist Remanded in Custody After Christmas Day Action →

Palestine Action Activist Remanded in Custody After Christmas Day Action

Dec 27, 2024 | 0 comments

Images available are free to use, with relevant credit

Following Palestine Action's Christmas Day action, against Elbit's UAV Engines Shenstone drone factory, an activist has been remanded in custody.

The activist, Bryn, was arrested on Christmas Day, at the Staffordshire plant, where Elbit, Israel's largest weapons maker, manufacture engines for the killer drones used in the Gaza Genocide. The UEL rotary engines are used in Elbit's 450 Drone, as well as the Israeli Military Industries (IMI) Harop Kamikase Drone, which is being upgraded to kill autonomously.

Whilst UAV Engines routinely obfuscate their involvement in supplying arms to Israel, in line with their non-disclosure agreement with the Israeli military, export licenses show the company send drone parts to Israel with the 'end-user' listed as the 'State of Israel'.

The Christmas Day action saw two specially-modified vehicles arrive at the Shenstone site, equipped with cherry-pickers, from which activists smashed the factory structure, while the drivers of the vehicles locked-on, secured inside. While Bryn was remanded in custody, the four others, who took part in the action, were released the following day, 26th December.

A dedicated activist, Bryn recorded the following statement on his arrest form:

"The spotlight should always be on Palestine, and the Palestinian struggle for equal human rights under international law, and against Israeli apartheid, ethnic cleansing, occupation and genocide.

"The failure of our government to stop arms exports to Israel compel many ordinary people, like me, who are human rights supporters, to take action against those exports, and against the killing they enable.

Bryn was arrested for another action on July 31st 2024, when Palestine Action blocked both entrances of the same UAV Engines factory, and plastered it with blood-red paint. While on bail for the action, he had not been charged, until now, which was a way of getting him remanded in prison.

A Palestine Action spokesperson said:

"As he joins Palestine Action's other 21 political prisoners, who will be starting 2025 in a jail cell, Bryn tells us that he is unbowed and unbroken, and accepts the position he is in. Like all, but 2, of the other prisoners, he is being held, unconvicted of any offence, imprisoned as part of the British state's attempt to deter Palestine Action. However, their actions against arms manufacturers will only serve to inspire others to take direct action to disrupt Israel's war machine."

ENDS

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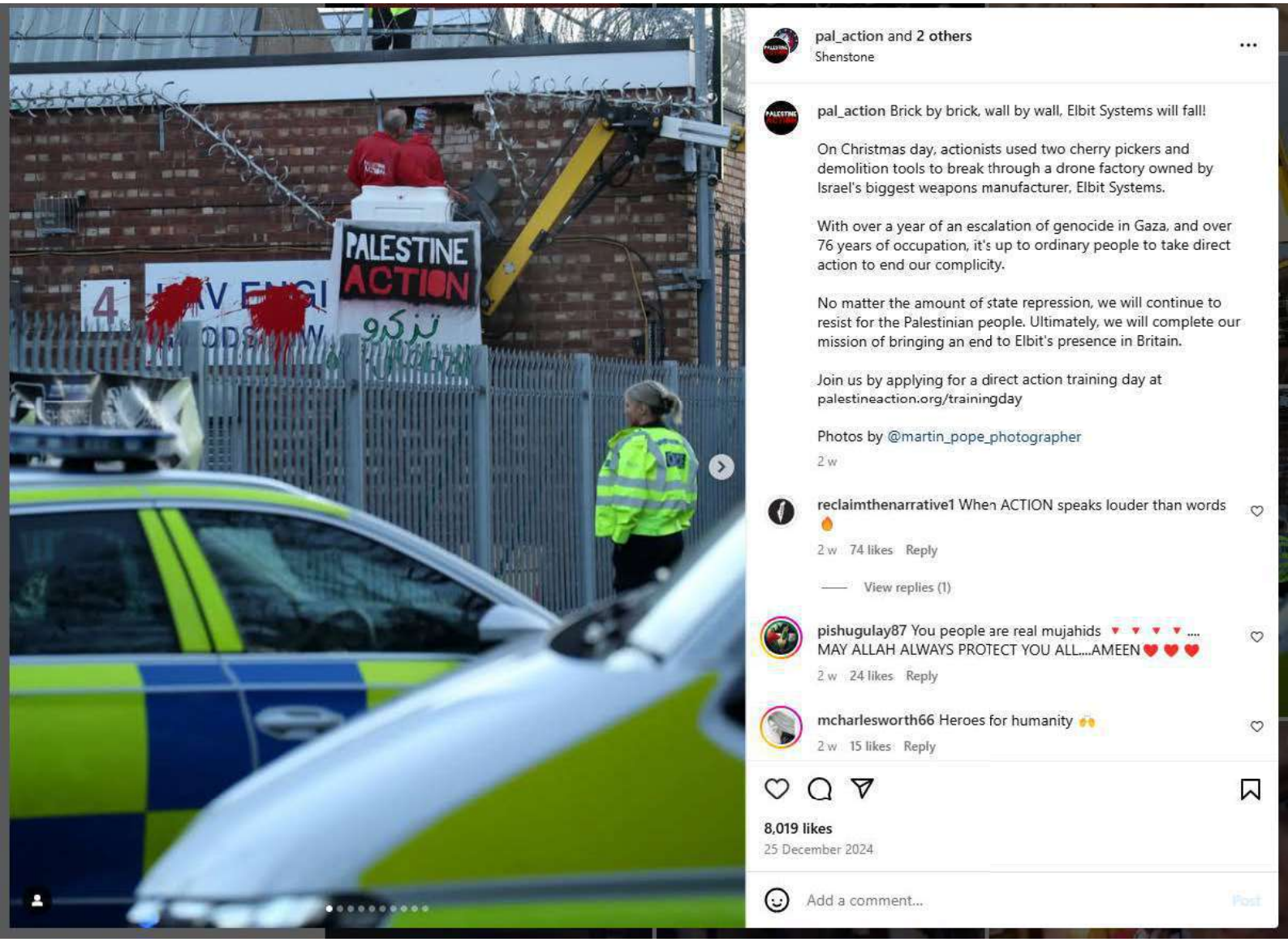
Glasgow factory smashed in overnight action for 'links to Gaza genocide' →


PALESTINE
ACTION
pal_action and 2 others
Shenstone
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No matter the amount of state repression, we will continue to resist for the Palestinian people. Ultimately, we will complete our mission of bringing an end to Elbit's presence in Britain.
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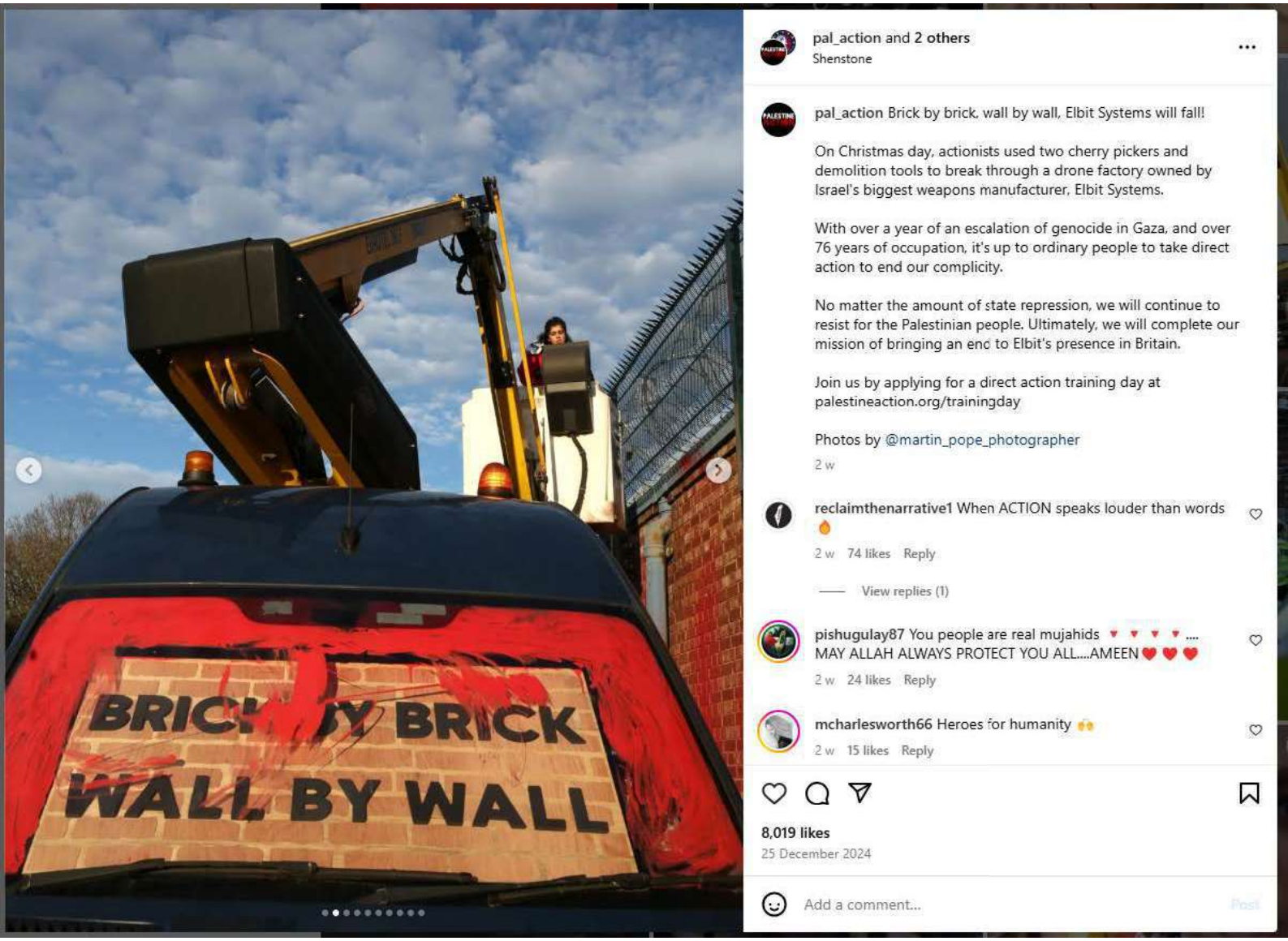

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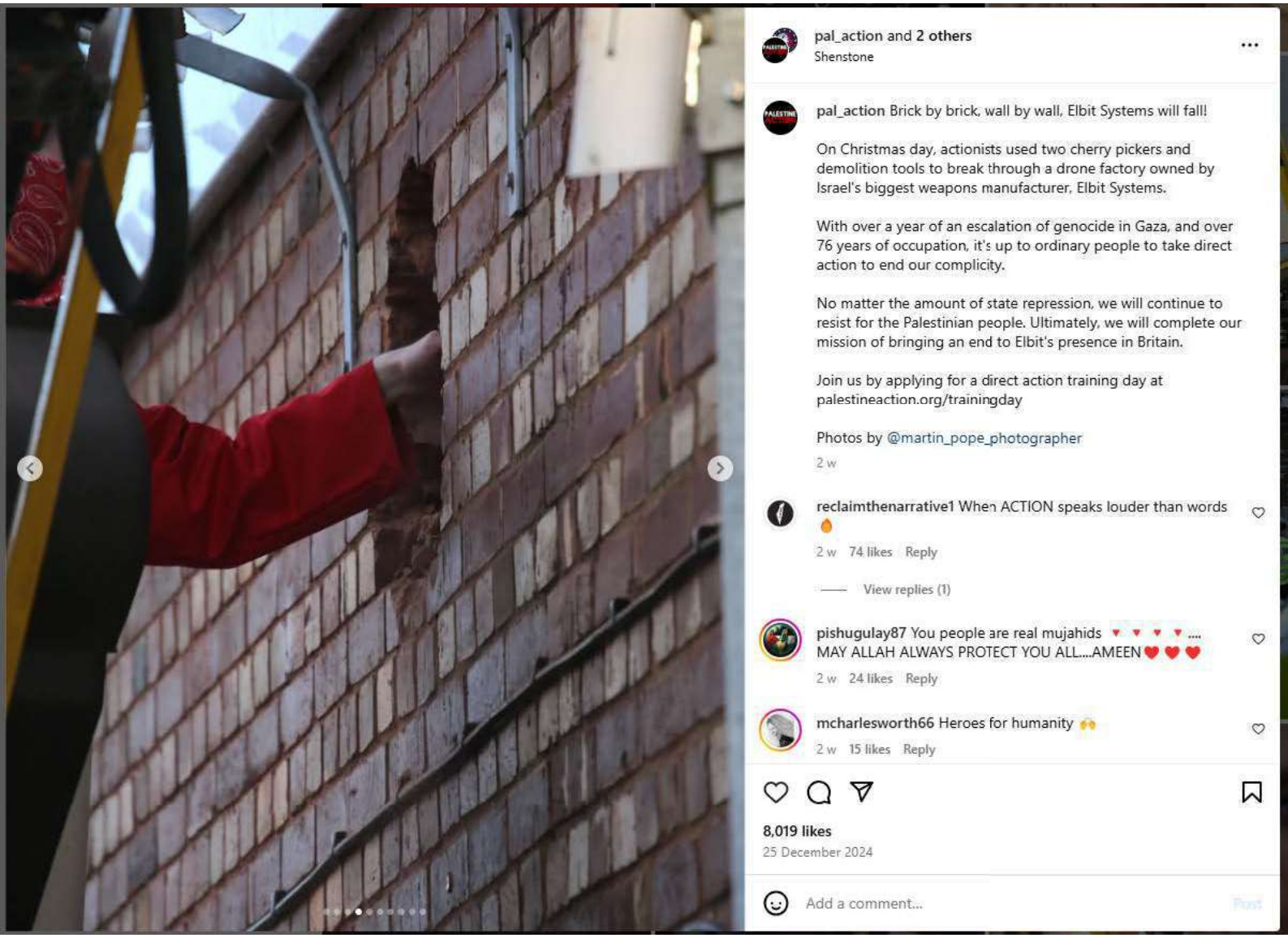
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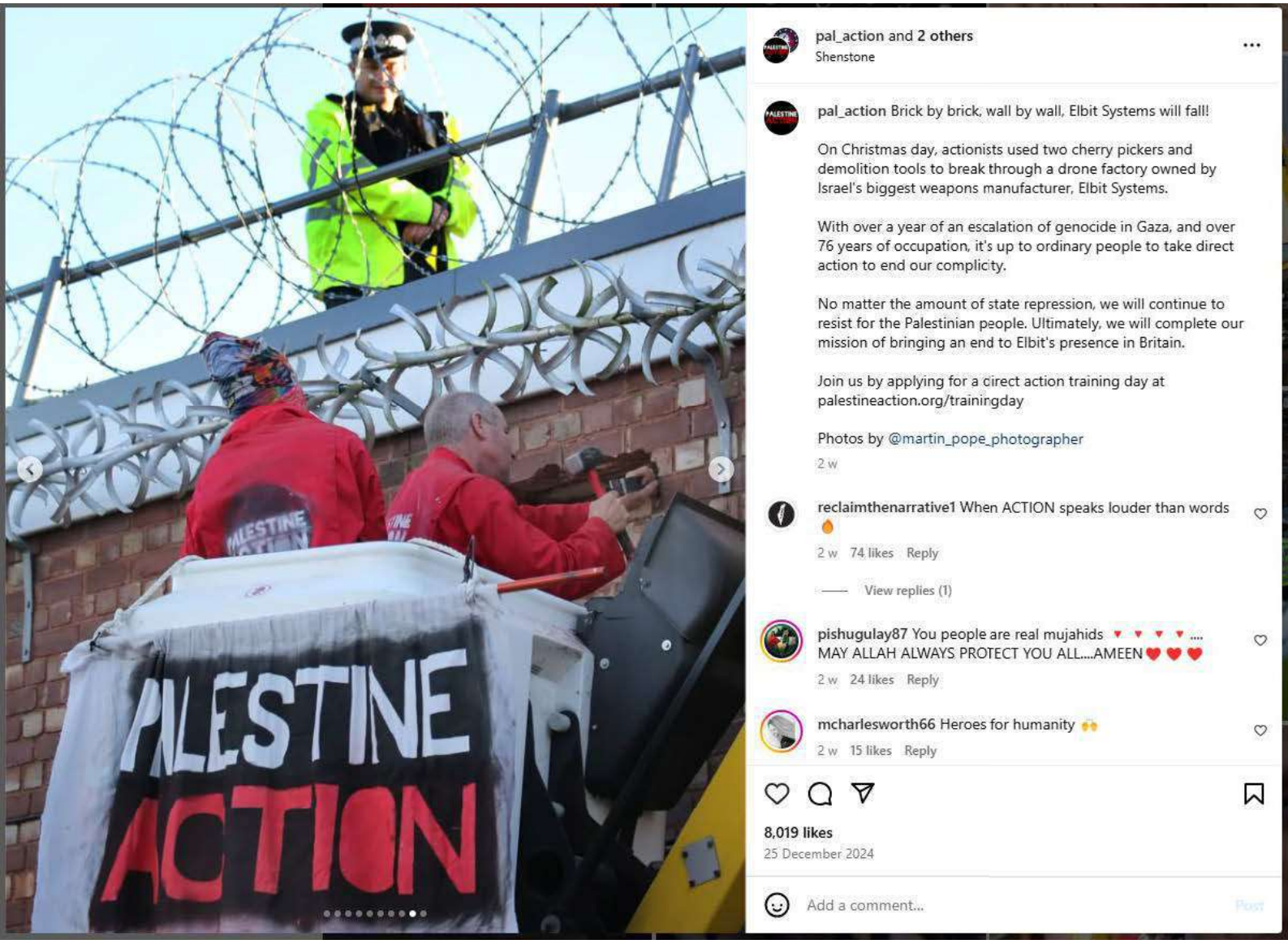

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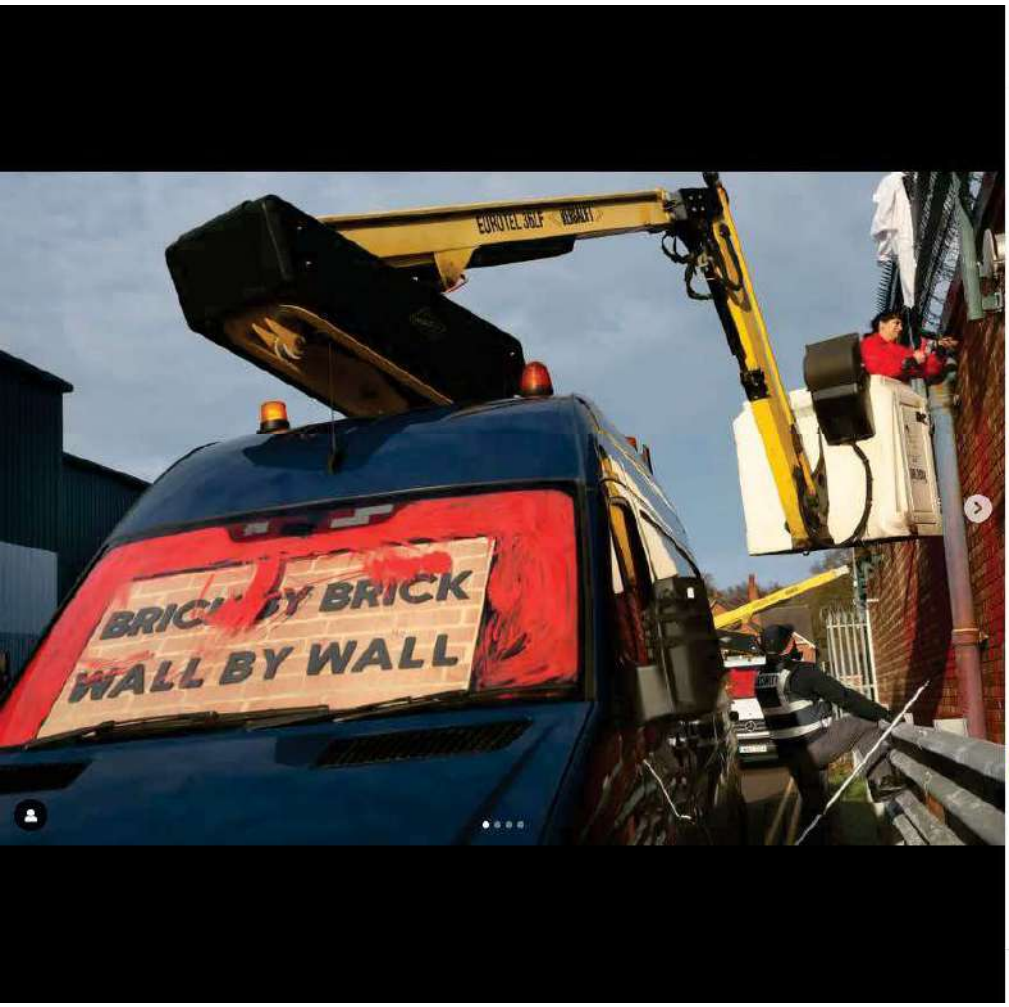

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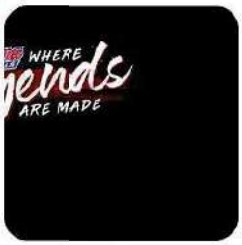

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After previous hits, they took down their business sign to try and hide — but they should know by now, we only stop when the complicity does.

6d

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becca2902 No hiding from genocide 👏👏👏

6d 24 likes Reply

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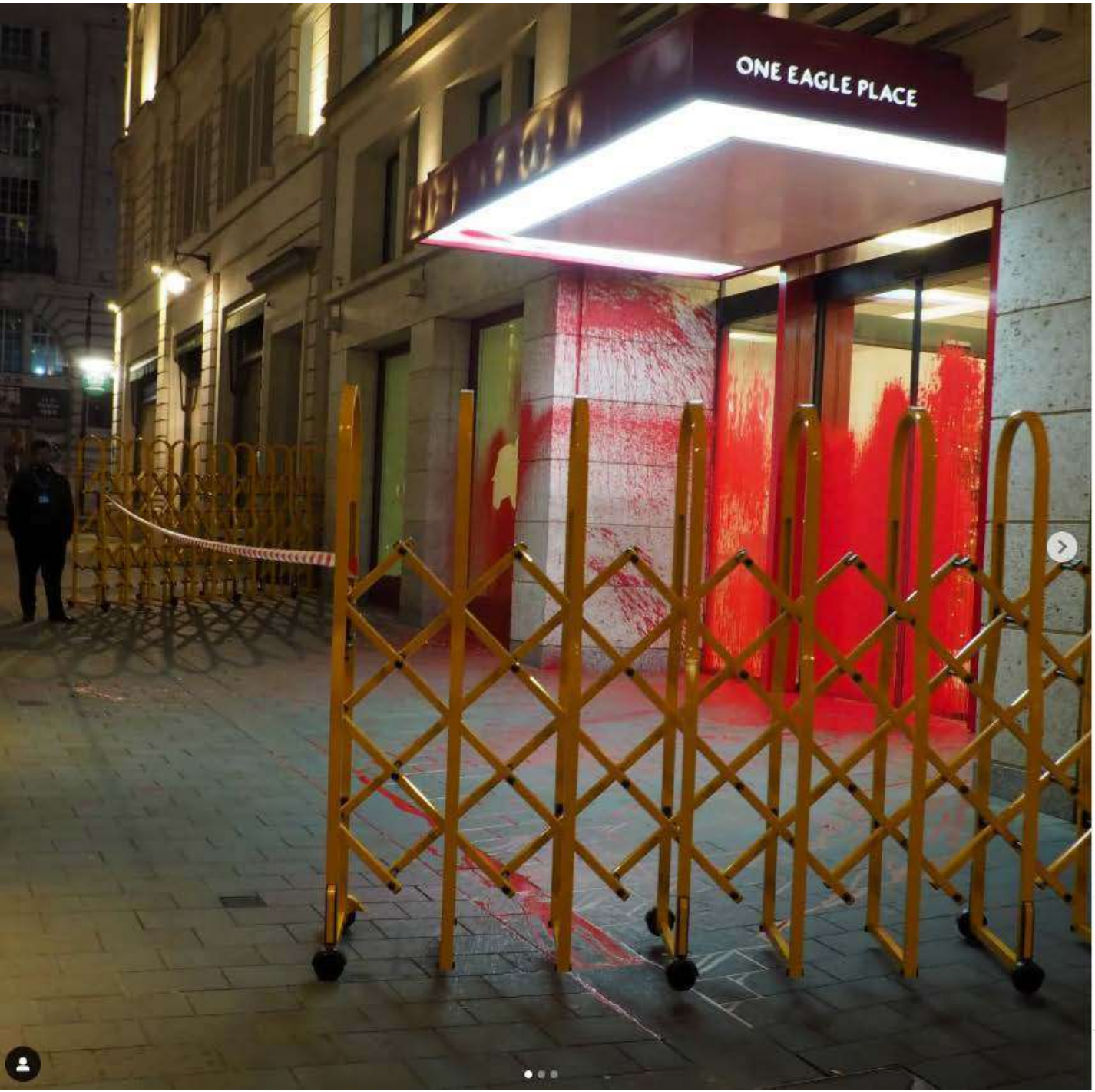

pal_action and 5 others
London, United Kingdom

pal_action BREAKING: Palestine Action target the London offices of Italian weapons firm Leonardo.

Leonardo supply parts for Apache attack helicopters and manufacture laser targeting systems for Israel's F-35 fighter jets from Britain.

This action is part of a wider direct action campaign against the arms giant by actionists in England, Scotland and Italy.

2 w

geqkez Long live the resistance around the world

2 w 121 likes Reply

momma_keri I only wish I had the courage to be doing what you all are. Thank you for doing what we all should be doing. 👏🔥

2 w 55 likes Reply

View replies (1)

geqkez More people should join. They cannot imprison all of us

2 w 63 likes Reply

View replies (1)

annejoelleford 😍😍😍😍😍😍😍😍😍😍

2 w 12 likes Reply

annasobaillu 🔥🍉

37,988 likes
29 December 2024

Add a comment... Post

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37,988 likes
29 December 2024

Add a comment... Post

Injunction signage - Wirral

Teledyne Co

Promap
LANDMARK INFORMATION

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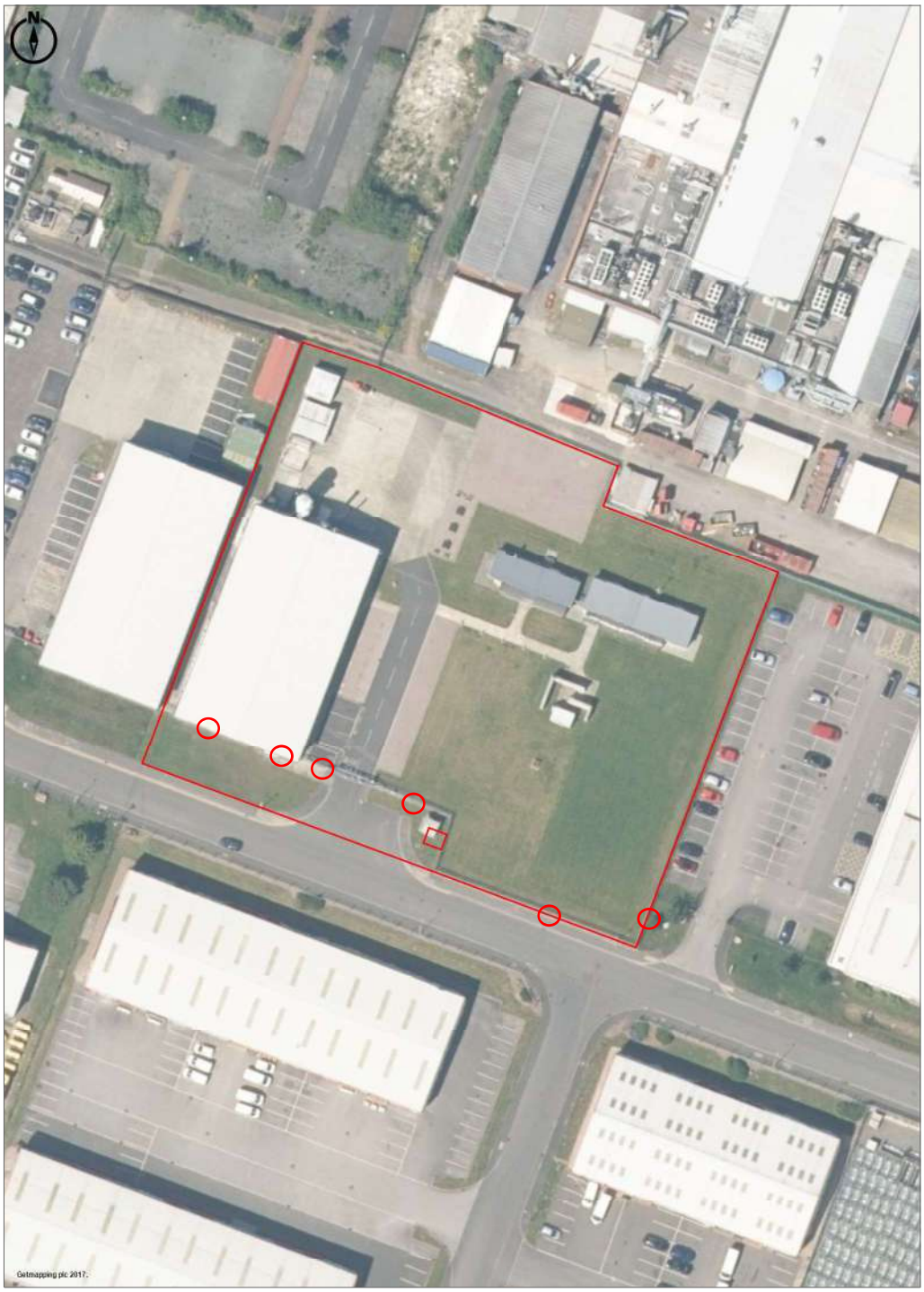
Title Number: EX688035

Injunction signage - Lincoln



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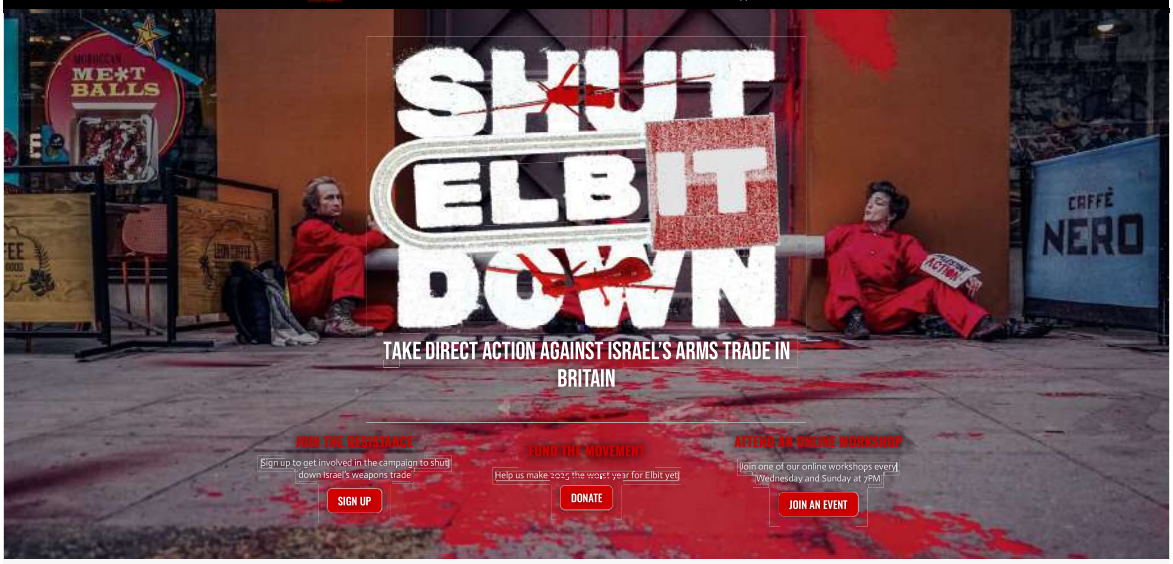
WARNING
INJUNCTION
THIS AREA IS SUBJECT TO A HIGH COURT INJUNCTION WHICH PLACES RESTRICTIONS ON SOME PROTEST ACTIVITIES.
YOU MUST NOT ENTER THIS SITE.
BREACH OF THE INJUNCTION COULD LEAD TO IMPRISONMENT.
FOR DETAILS, PLEASE SEE WWW.TELEDYNE-INJUNCTION.CO.UK OR FOLLOW THIS QR CODE
Anglocabin



JOIN A DIRECT ACTION TRAINING DAY

DIRECT ACTION TRAINING DAY [LONDON]

Date January 19, 2025
Time All Day Event
Website BOOK HERE

DIRECT ACTION TRAINING DAY [LIVERPOOL]

Date January 26, 2025
Time 11:00 am - 5:00 pm
Website BOOK HERE

DIRECT ACTION TRAINING DAY [BRISTOL]

Date February 1, 2025
Time 11:00 am - 5:00 pm
Website BOOK HERE

Load More

Join Palestine Action

JOIN PALESTINE ACTION

First Name
Last Name
Email *
Zip/Postal Code *
PHONE NUMBER *
Not in GB?

ARE YOU INTERESTED IN TAKING DIRECT ACTION AGAINST ISRAEL'S ARMS TRADE? *
YES
NO

IF YES TO THE ABOVE, HAVE YOU TAKEN PART IN A PALESTINE ACTION DIRECT ACTION WORKSHOP?
YES
NO

ARE YOU PREPARED TO SUPPORT ACTIONISTS AT COURT AND POLICE STATIONS? *
YES
NO

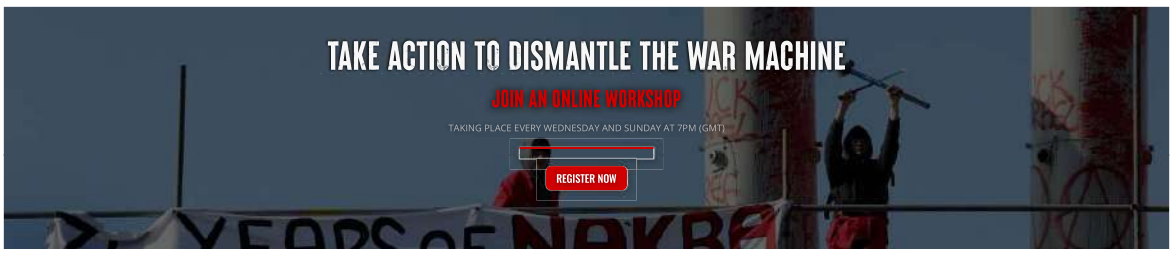
If you are not already subscribed, would you like to receive email updates from Palestine Action? *
Yes, opt in to email updates
No, do not opt in

Note: If you subscribed earlier, this will not unsubscribe you. You can unsubscribe using the link provided in emails you receive. You can always take action without opting in.

I'M IN

Sponsored by: Palestine Action

Action Network



SUPPORT UPCOMING TRIALS

THE #ALLIANZ3 (CROWN) PLEA-HEARING

DATE January 16, 2025
TIME 9:30 am - 11:30 am
VENUE Guildford Crown Court

MORE INFO

THE #FILTON18 HEARING

DATE January 17, 2025
TIME 9:30 am - 12:00 pm
VENUE Old Bailey Crown Court

MORE INFO

THE #LEONARDO 3 SENTENCING

DATE January 21, 2025
TIME 9:30 am - 4:30 pm
VENUE Edinburgh Sheriff Court

MORE INFO

Load More

DIRECT ACTION TRAINING DAY

AS THE GENOCIDE OF PALESTINIANS RAGES ON, IT'S IMPORTANT TO RECOGNISE HOW CLOSE TO HOME THE ISRAELI WAR INDUSTRY IS AND HOW WE CAN IMPACT IT.

Britain is home to several Israeli weapons firms, including Israel's largest weapons firm, Elbit Systems. Elbit manufacture tanks, bullets, drones and munitions for the Israeli military and market their weaponry as "battle-tested" – tested on Palestinian men, women and children.

THE ISRAELI WAR MACHINE IS OPERATING IN BRITAIN, AND THROUGH DIRECT ACTION WE CAN STOP IT IN ITS TRACKS.

The British government has been complicit in the colonisation of Palestine for over 100 years – protests and lobbying efforts has failed to change that. This refusal for the powers that be to end their participation in Israeli war crimes, and the presence of Israeli weapons factories on our doorstep, demands a more effective and direct approach – direct action.

In the words of the late David Graeber:

"PROTEST IS LIKE BEGGING THE POWERS THAT BE TO DIG A WELL. DIRECT ACTION IS DIGGING THE WELL YOURSELF AND DARING THEM TO STOP YOU"

Palestine Action is running training days across the country, to bring together like minded people for a day of talks, trainings and group discussions. All of which is geared towards harnessing the strength of the grassroots and directing it towards bringing down Israel's war machine.

APPLY TO JOIN

Fill in the form to join an upcoming direct action training day in your area.

REGISTER

CRASH COURSE ON DIRECT ACTION [ONLINE WORKSHOP]

Date January 15, 2025
Time 7:00 pm - 9:00 pm
Website BOOK HERE

Join this crash course on direct action to find out how you can be part of this campaign and help us #ShutElbitDown. The workshop will cover our theory on direct action, British complicity and the legal process associated with taking action!

DIRECT ACTION TRAINING DAY [LONDON]

Date January 19, 2025
Time All Day Event
Website BOOK HERE

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Time 7:00 pm - 9:00 pm
Website BOOK HERE

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CRASH COURSE ON DIRECT ACTION [ONLINE WORKSHOP]

Date January 22, 2025
Time 7:00 pm - 9:00 pm
Website BOOK HERE

Join this crash course on direct action to find out how you can be part of this campaign and help us #ShutElbitDown. The workshop will cover our theory on direct action, British complicity and the legal process associated with taking action!

DIRECT ACTION TRAINING DAY [LIVERPOOL]

Date January 26, 2025
Time 11:00 am - 5:00 pm
Website BOOK HERE

Palestine Action is running training days across the country, to bring together like minded people for a day of talks, trainings and group discussions. All of which is geared towards harnessing the strength of the grassroots and directing it towards bringing down Israel...

CRASH COURSE ON DIRECT ACTION [ONLINE WORKSHOP]

Date January 26, 2025
Time 7:00 pm - 9:00 pm
Website BOOK HERE

Join this crash course on direct action to find out how you can be part of this campaign and help us #ShutElbitDown. The workshop will cover our theory on direct action, British complicity and the legal process associated with taking action!

CRASH COURSE ON DIRECT ACTION [ONLINE WORKSHOP]

Date January 29, 2025
Time 7:00 pm - 9:00 pm
Website BOOK HERE

Join this crash course on direct action to find out how you can be part of this campaign and help us #ShutElbitDown. The workshop will cover our theory on direct action, British complicity and the legal process associated with taking action!

DIRECT ACTION TRAINING DAY [BRISTOL]

Date February 1, 2025
Time 11:00 am - 5:00 pm
Website BOOK HERE

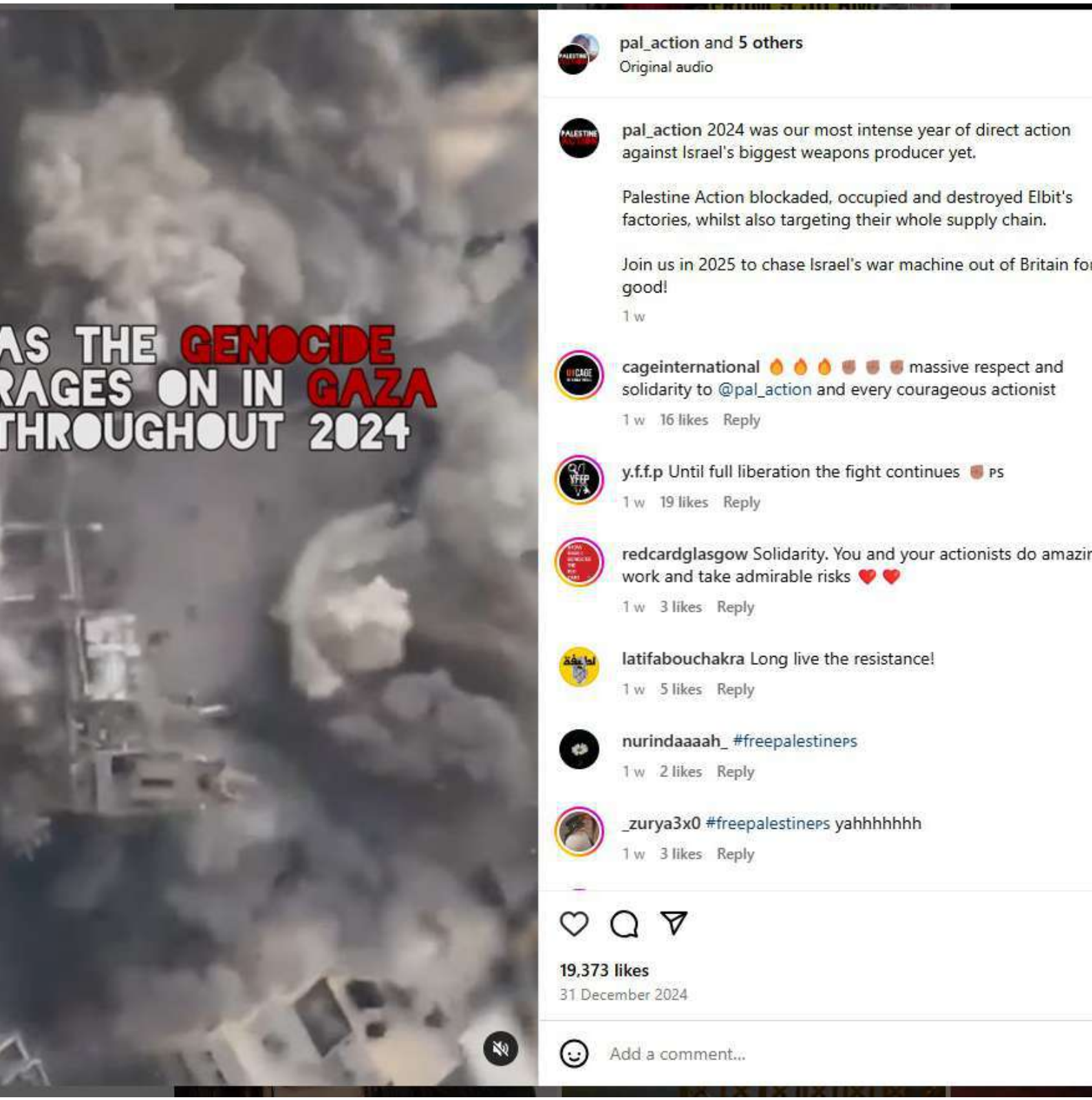
Palestine Action is running training days across the country, to bring together like minded people for a day of talks, trainings and group discussions. All of which is geared towards harnessing the strength of the grassroots and directing it towards bringing down Israel...

DIRECT ACTION TRAINING DAY [BIRMINGHAM]

Date February 2, 2025
Time 11:00 am - 5:00 pm
Website BOOK HERE

Palestine Action is running training days across the country, to bring together like minded people for a day of talks, trainings and group discussions. All of which is geared towards harnessing the strength of the grassroots and directing it towards bringing down Israel...

If you're interested, please fill in the application form. The location of the training day will not be disclosed in advance. We advise you to download signal messenger at signal.org/download where we will contact you directly. Only those who pass our vetting procedure will be informed of the location and allowed to participate.


AS THE GENOCIDE
RAGES ON IN GAZA
THROUGHOUT 2024
pal_action and 5 others
Original audio
pal_action 2024 was our most intense year of direct action against Israel's biggest weapons producer yet.
Palestine Action blockaded, occupied and destroyed Elbit's factories, whilst also targeting their whole supply chain.
Join us in 2025 to chase Israel's war machine out of Britain for good!
1 w
cageinternational massive respect and solidarity to @pal_action and every courageous actionist
1 w 16 likes Reply
y.f.f.p Until full liberation the fight continues PS
1 w 19 likes Reply
redcardglasgow Solidarity. You and your actionists do amazin work and take admirable risks
1 w 3 likes Reply
latifabouchakra Long live the resistance!
1 w 5 likes Reply
nurindaaaah_ #freepalestineps
1 w 2 likes Reply
_zurya3x0 #freepalestineps yahhhhhhh
1 w 3 likes Reply
19,373 likes
31 December 2024
Add a comment...

IN THE HIGH COURT OF JUSTICE **CLAIM NO. KB-2024-004175**
KING'S BENCH DIVISION

B E T W E E N :

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

THIRD 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 return date listed for 24 January 2025 to update the Court on matters that have arisen since the Claimant filed and served the third witness statement of Nicholas Wargent (dated 15 January 2025) in accordance with the Order of Bourne J dated 20 December 2024. Whilst the directions do not make provision for this further witness statement, I make this statement with the intention of assisting the Court on an issue that may be material to the continuation of the Interim Injunction, and therefore respectfully ask that the Claimant be permitted to rely on this short statement.

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 **MS3**. All references to that exhibit are in the format **MS3/page number.**

The Gaza conflict ceasefire

5. On 15 January 2025, national and international media reported that a ceasefire deal had been agreed between Hamas and Israel, which would bring an end to the current conflict in the Gaza region and result in the return of hostages. I understand from that news coverage that the ceasefire deal came into effect on 19 January 2025. I exhibit at **MS3/1 - 3** a copy of an online BBC News article that briefly explains the timeline of the ceasefire, which can also be accessed here (and which I accessed on 23 January 2025 when preparing this statement): https://www.bbc.co.uk/news/articles/cvg4ryde7q5o.

Impact of the ceasefire on protest activity

6. The news of the ceasefire does not appear to have dampened the resolve of activists in this country to engage in acts of direct-action protest. As evidence of this, I refer in particular to:

    i. A post on the Palestine Action's Instagram dated "1 week ago" (which I understand to mean 16 January 2025). The post appears to have been created by an author titled "vocalpolitics", but appears on the Palestine Action Instagram feed. In that video, a lone male is making a statement to the camera, with a video overlay of various images, in which he urges viewers to "*escalate resistance in every form possible from boycotts to direct action the pressure must grow… this is not a moment for celebration, it's a moment for action, direct-action*". The video can be viewed here: https://www.instagram.com/reel/DE5r-a0sCy-/?igsh=MWFya3l6MXAwcHpuaA%3D%3D. The caption that accompanies the

video reads "*The end of the US-Israeli genocide in #Gaza does not mark the end of the battle against their crimes. Now is the time to escalate direct action against Israel and its interests, while keeping focus on the ultimate goal: ending the Israeli occupation across all of Palestine*". I exhibit a screen shot of the post at **MS3/4**. I accessed the post on 23 January 2025 when preparing this witness statement.

ii. Since the announcement and coming into force of the ceasefire, Palestine Action has continued its programme of direct-action. On 22 January 2025, two activists from Palestine Action 'occupied' the Aviva Centre in Bristol. I understand from a news article on the Palestine Action website (https://palestineaction.org/aviva-bristol/), which I exhibit at **MS3/5 – 6** and which I accessed on 23 January 2025 when preparing this statement, as well as other posts made on the Palestine Action Instagram feed, that two activists associated with the group attended the building; one climbed on the building, whilst another sprayed painted it in the familiar red paint. The building appears to have been target as Aviva provide the employer's liability insurance to UAV Engines Ltd, which operates the factory in Staffordshire that was targeted by Palestine Action activists on Christmas Day (as set out in Mr Wargent's third witness statement). I note that the news article states "[d]*espite a ceasefire being implemented in Gaza, the Israeli military begun "Operation Iron Wall" in Jenin, West Bank. In the last 24 hours, they've killed 9 Palestinians and injured 70 in the region*". The article also quotes a spokesperson for Palestine Action as saying "*Palestine Action will continue to take direct action against companies such as Aviva as long as they facilitate the destruction of Palestine and massacres of the indigenous population of the land*".

iii. A further example of Palestine Action continuing its programme of direct-action is documented on the Palestine Action Instagram feed. In a post dated "4 days ago", which I take to mean 19 January 2025, a picture of what appears to be a glass-fronted building can be seen. That building has been splashed with a red substance, and a person appears to be cleaning it from the glass. The accompanying caption reads "*BREAKING: Palestine Action target the London offices of CDW, tech suppliers for Israel's biggest weapons firm. Action won't stop until the zionist war machine is defeated and Palestine is liberated."* I exhibit a copy of the post at **MS3/7**, which I accessed on 23 January 2023 when preparing this statement.

iv. Mr Wargent, in his third witness statement, explained that the Palestine Solidarity Campaign had advertised a march in Chelmsford, to be held on 8 February 2025. For completeness, I observe that further details of that march and its route have been released on the Instagram page of the Chelmsford Branch of the Palestine Solidarity Campaign. The march is still going ahead, and still appears to be planned as a peaceful protest. The Claimant continues to take no issue with this planned protest.

7. Consequently, the news of the ceasefire does not alleviate the Claimant's concern and apprehension of future and imminent acts of direct-action protest at its sites that are the subject of the Interim Injunction.

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

M Singh
…….
Manan Singh
Dated this 23rd day of January 2025

IN THE HIGH COURT OF JUSTICE **CLAIM NO. KB-2024-004175**
KING'S BENCH DIVISION

B E T W E E N :

TELEDYNE UK LIMITED

Claimant

-and-

(1) JULIAN ALLEN GAO

(2) RUBY HAMILL

(3) DANIEL JONES

(4) NAJAM SHAH

(5) RICKY SOUTHALL

(6) AMAREEN AFZAL

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Defendants

EXHIBIT MS3

This is Exhibit MS3 referred to in the Third Witness Statement of Manan Singh.

Key events that led to Israel-Hamas ceasefire deal in Gaza

A protester in Israel called for an end to the conflict in early January 2025

16 January 2025
Updated 19 January 2025

Israel and Hamas have agreed to a Gaza ceasefire and hostage release deal, the US and mediators Qatar have said.

After the Israeli cabinet and government formally approved the agreement, the first six-week phase began on 19 January.

The deal follows 15 months of fighting between Israel and Hamas, a Palestinian armed group and political movement.

The current conflict started when hundreds of Hamas fighters stormed across Israel's southern border on 7 October 2023, killing about 1,200 people and taking more than 250 hostages back to Gaza.

Israel responded with a military campaign, starting with an immediate air bombardment and then a full-scale ground invasion launched on 27 October. Since then, Israel has attacked targets across Gaza by land, sea and air, while Hamas has attacked Israel with rockets.

- **Follow the latest updates here**
- **Who are the released and rescued hostages?**
- **What we know about the Gaza ceasefire deal**
- **How historic deal was sealed with 10 minutes to spare**
- **WATCH: Mixed feelings in Israel about deal with Hamas**

More than 46,700 people - the majority of them civilians - have been killed by Israel's attacks, according to Gaza's Hamas-run health ministry.

Here is a reminder of the key events in negotiations.

Top stories

LIVE Southport killer Axel Rudakubana to be sentenced for attacks

How red flags over Southport killer were repeatedly missed
18 hours ago

Rare red 'danger to life' warnings issued ahead of Storm Éowyn
12 minutes ago

More to explore

How to protect your home before, during and after a storm

Ros Atkins on... the politics of pardons

'I had anti-government views so they treated me for schizophrenia'

REUTERS

What led to the ceasefire deal

2023

7 October: Hundreds of Hamas-led gunmen launch an unprecedented attack on southern Israel, bursting through the border fence and targeting nearby communities, police stations and army bases. About 1,200 people are killed and 251 hostages taken back to Gaza. Hamas also fires thousands of rockets into Israel. The Israeli military immediately responds with air and artillery strikes on Gaza.

27 October: Israel launches a ground invasion of Gaza. Israel's massive military campaign will go on to devastate Gaza, displace most of the 2.3 million population, and kill more than 46,000 people, according to the Hamas-run health ministry.

21 November: A deal brokered by the US, Qatar and Egypt sees Hamas release 105 of the hostages in return for some 240 Palestinian prisoners in Israeli jails during a week-long ceasefire. Israel and Hamas **blame each other** for causing the collapse of the truce.

28 December: Shuttle diplomacy on a new ceasefire and hostage release deal starts.

2024

31 May: US President Joe Biden **outlines an Israeli proposal** for a three-phase ceasefire in return for the release of Israeli hostages. It forms the basis of the deal that is agreed upon eight months later.

10 June: The United Nations Security Council **passes a resolution** supporting the ceasefire plan.

31 July: The talks are suspended **following Israel's assassination** of Hamas political leader and chief negotiator Ismail Haniyeh in the Iranian capital, Tehran. Discussions resume two weeks later, initially in the absence of Hamas.

17 October: Israeli forces **kill Hamas leader Yahya Sinwar** in southern Gaza. Netanyahu calls it the "beginning of the end" of the war.

9 November: After months without a breakthrough, Qatar **suspends its efforts** as mediator in the negotiations. It says Israel and Hamas need to shift their positions. Both sides blame each other for the impasse.

20 November: The US **vetoes a draft** UN Security Council resolution calling for an immediate ceasefire, saying it "abandoned" the necessity for there to be "a linkage between a ceasefire and the release of hostages".

27 November: Israel **agrees a ceasefire** with Lebanon to end a 13-month conflict with the armed group Hezbollah, an ally of Hamas, which was triggered by the Gaza war. It reignites hope for a deal in Gaza, with Biden saying he will make another push with regional powers.

2 December: US President-elect Donald Trump **says there w** 487 **ll to pay"** if the hostages still held in Gaza are not released by the urns to the White House on 20 January 2025.

Pop princesses and Succession stars: The actors tipped for an Oscar nomination later

Trump comes out swinging in rapid start to presidency

Syrians returning home face deadly threat of landmines

'I got a credit card as I lost winter fuel payment'

'A long fight full of tears': Why Thailand became a haven for LGBT couples

US Politics Unspun: As Trump starts his second term, cut through the noise with Anthony Zurcher's newsletter

17 December: A senior Palestinian official **says the indirect talks** are in a "decisive and final phase", while Israeli Defence Minister Israel Katz says an agreement is closer than ever.

2025

13 January: Biden and Netanyahu speak by phone about negotiations during Biden's final week in office, after US Secretary of State Antony Blinken said **an agreement was "very close"** and that he hoped to "get it over the line" before Trump takes office.

15 January: Qatar's prime minister says Israel and Hamas agreed a Gaza ceasefire and hostage release deal, and that it will take effect on 19 January. Biden says it will "halt the fighting in Gaza, surge much needed-humanitarian assistance to Palestinian civilians, and reunite the hostages with their families".

17 January: Israel's cabinet **approves the deal**, following hours of discussion and despite two far-right ministers voting against it, allowing the agreement to come into effect on 19 January.

19 January: The ceasefire comes into effect at 11:15 local time (09:15 GMT), following a delay of several hours from the scheduled start time after Israel said Hamas had not handed over the names of the first 33 hostages due to be released.

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The end of the US-Israeli genocide in #Gaza does not mark the end of the battle against their crimes.

Now is the time to escalate direct action against Israel and its interests, while keeping focus on the ultimate goal: ending the Israeli occupation across all of Palestine.

#vpol #GazaGenocide #GazaUnderAttack

saharrouhani 4 d
👏👏👏

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1,301 likes
6 days ago

Palestine Action occupy Aviva, insurers of Israel's weapons industry

Jan 22, 2025 | 0 comments

Images and videos are available for free, with the relevant credit

From 7.30AM on 22nd January 2025, Palestine Action begun occupying 'The Aviva Centre' in Bristol, BS34 8SQ. One activist is on top of the overhang of the 'UK's largest insurer', whilst another spraypainted the front glass of the building. Messages painted on the building include 'Pal Action' and 'Elbit Out'. Aviva provides the mandatory employers liability insurance for UAV Engines in Staffordshire, a drone engine factory owned by Israel's biggest weapons manufacturer, Elbit Systems.

Recent disclosures show the company no longer holds direct shares in Elbit Systems. However, as well as insuring an Israeli weapons factory, Aviva also continue to hold investments in funds which hold Elbit shares.

By insuring UAV Engines, Aviva is facilitating the design and production of drone engines used to power Israel's killer drone fleet, including the Hermes 450 drones and IAI's Harop and Harpy attack drones. Such drones are used to surveil, massacre and terrorise Palestinians, both in Gaza and in the West Bank.

In direct contradiction with facilitating Elbit weapons production, 'The Aviva Business Ethic Code' states: *"Respecting our customers, colleagues, communities, partners and the environment is part of our approach to human rights.* ***As a company, we have an obligation to ensure our business activities do not cause or contribute to violations of human rights of others***".

Elbit Systems provides over 85% of Israel's military drone fleet and land-based equipment, as well as munitions, missiles and electronic warfare. According to Elbit's CEO Bezhalel Machlis, the company "ramped up production" to arm the Israeli military to commit what the International Court of Justice ruled as a 'plausible genocide' in Gaza. The company routinely uses assaults on Palestinians as a means to market new weaponry as "battle-tested".

Despite a ceasefire being implemented in Gaza, the Israeli military begun "Operation Iron Wall" in Jenin, West Bank. In the last 24 hours, they've killed 9 Palestinians and injured 70 in the region. Many of those killings were conducted using air strikes and drones.

Palestine Action's direct action campaign has also consistently target Allianz offices, as they provide insurance for the other Elbit British subsidiaries. Actions against Allianz included operations against 10 of their British and Irish offices overnight, as well as sustained actions against the insurers premises.

A Palestine Action spokesperson said:

"Israel's biggest weapons firm could not work in Britain in isolation. Aviva is providing the mandatory insurance Elbit needs in order to build Israeli weapons on our doorstep. Without insurance, the Israeli arms maker would not be able to operate in Britain.

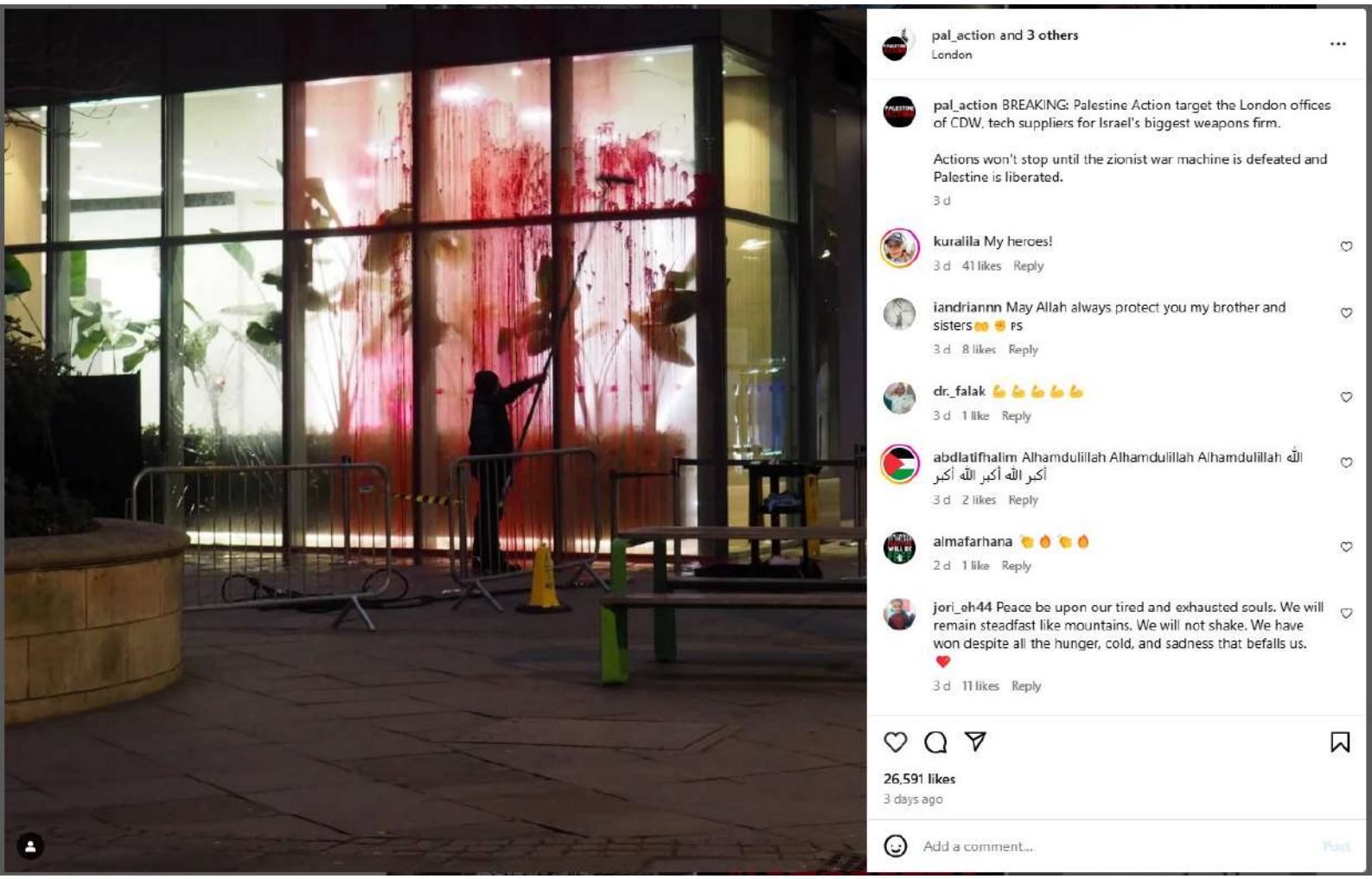
Palestine Action will continue to take direct action against companies such as Aviva as long as they facilitate the destruction of Palestine and massacres of the indigenous population of the land."

NOTES TO EDITORS

If you would like any further information on Palestine action, please contact media@palestineaction.org

Palestine Action is a direct-action network of groups and individuals formed with the mandate of taking direct action against Elbit Systems' UK locations at grassroots level, calling for them all to be shut down and for the British government to end its complicity in Israeli apartheid.

← 'Not Guilty' Pleas on All Counts, #Filton18 Returned to Prison by Judge


pal_action and 3 others
London
pal_action BREAKING: Palestine Action target the London offices of CDW, tech suppliers for Israel's biggest weapons firm.
Actions won't stop until the zionist war machine is defeated and Palestine is liberated.
3 d
kuralila My heroes!
3 d 41 likes Reply
iandriannn May Allah always protect you my brother and sisters PS
3 d 8 likes Reply
dr._falak
3 d 1 like Reply
abdlatifhalim Alhamdulillah Alhamdulillah Alhamdulillah الله أكبر الله أكبر الله أكبر
3 d 2 likes Reply
almafarhana
2 d 1 like Reply
jori_eh44 Peace be upon our tired and exhausted souls. We will remain steadfast like mountains. We will not shake. We have won despite all the hunger, cold, and sadness that befalls us.
3 d 11 likes Reply
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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

(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

Defendants

FOURTH 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 support of the Claimant's Application to add two further persons (namely **Mary Ensell** and **Harry Wade**) as Named Defendants to the Claim, and to also extend the scope of the interim injunction Order granted by Mrs Justice Tipples on 24 January 2025 (the **'Interim Injunction'**) to cover these additional persons, pending the final hearing of the Claim (or settlement by way of undertakings). I set out in more detail at paragraph 7 below the order that is sought.

3. Given how recently the Interim Injunction has been considered (that being on 24 January 2024 at a 1 day return date listing before Mrs Justice Tipples), and in the circumstances of this Application (which I explain below), I respectfully ask the Court to consider this Application on the papers. If the Court does not think that to be appropriate, a 60 minute

listing is suggested; however, as will become clear below, it is desirable that an Order is made as soon as possible, so that the directions that are set for the existing Named Defendants can be extended to apply to Ms Ensell and Mr Wade, without upsetting the listing of the final hearing (or, in the alternative, truncating any directions for Ms Ensell and Mr Wade).

4. 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. This statement was prepared through email correspondence with officers and employees of the Claimant, and the Claimant's external legal representatives.

5. I exhibit to this witness statement a bundle of documents marked **MS4**. All references to that exhibit are in the format **MS4/page number.**

6. This Application will be served by first-class post on Ms Ensell and Mr Wade (the Claimant has obtained addresses for both).

Order sought

7. The Claimant seeks an Order:

   i. adding **Mary Ensell** as the **Nineteenth Defendant** to the Claim (pursuant to CPR 19.4);

   ii. adding **Harry Wade** as the **Twentieth Defendant** to the Claim (pursuant to CPR 19.4);

   iii. extending the scope of the prohibitions of the Interim Injunction to include Ms Ensell and Mr Wade;

   iv. extending the scope of the alternative service Order and directions in the Interim Injunction to include Ms Ensell and Mr Wade.

8. A copy of the Interim Injunction is exhibited at **MS4/1 – 19**.

9. The Draft Order that accompanies this Application replicates the provisions and directions of the Interim Injunction (in so far as they apply to Named Defendants), and simply extends these to Ms Ensell and Mr Wade, whilst also making provision for the necessary further amendments to the Amended Claim Form. I respectfully submit that this is the most sensible approach; the directions that have been set by Mrs Justice Tipples run to a final hearing on 25 July 2025 (if no settlement by way of undertakings is reached). To subject Ms Ensell and Mr Wade to alternative directions would risk upsetting the final listing, which has been deliberately set to bring the Claim against the Named Defendants to a swift conclusion, and the Order against Persons Unknown on for a timely review.

Background

10. By way of a Part 8 Claim Form dated and issued on 13 December 2024, the Claimant sought injunctive relief against seven Named Defendants and four defined categories of Persons Unknown. The causes of action relied upon are trespass, interference with the Claimant's common law right to access the highway and public nuisance caused by obstruction of the highway.

11. The relief from trespass is sought in relation to six of the Claimant's sites throughout the country, including the 'Shipley Site', as defined in the Claim (that being Teledyne UK Limited, Airedale House, Acorn Park, Shipley BD17 7SW). The relief in relation to the other two causes of action is sought in relation to the Shipley Site only.

12. The injunctive relief sought can be categorised as a so-called 'protest injunction' in that it is intended to restrict and prohibit some acts of direct-action protest at the six relevant sites. However, at its core, the relief sought is really just an injunction restraining acts of trespass, with some additional protections sought in relation to the Shipley Site, given recent acts of alleged unlawful direct-action protest that have occurred there.

13. As has been explained in detail in the evidence in this Claim and at both the without notice and return date hearings, the nature of the Claimant's business (and specifically its export

of products under licence to Israel) has caused the Claimant to become a target for pro-Palestinian protests. Those protests have typically taken the form of acts of aggravated trespass, with significant property damage having been caused. Often, the acts of aggravated trespass were committed by protestors associated with the direct-action group known as 'Palestine Action'.

14. The protests increased in frequency throughout 2024, and notably so in the last quarter. Alongside the acts of aggravated trespass, additional incidents began to occur at the Shipley Site by which protestors would obstruct access and egress at the Site, such that the Site was effectively blockaded. On occasion, these blockade incidents have lasted for several hours.

15. Alongside the Part 8 Claim Form, the Claimant issued an Application Notice seeking without notice interim relief (short informal notice of the hearing was given to Palestine Action and various other protest groups by way of email – but the Application was still technically without notice). The Claimant apprehend further and imminent acts of protest over the Christmas period by reason of the increasing frequency of such incidents, the continued instability in the Middle East, and the imminent holiday period (with some previous acts of protest having coincided with holiday periods).

16. A half-day listing of the Application was initially listed for 19 December 2024. Unfortunately, the Judge was required to recuse himself at the hearing by reason of a conflict of interest. Whilst the hearing was taking place, an aggravated act of direct-action protest was taking place at the Shipley Site. The person responsible for that act (Luke Carter), has since been added to the Claim and Interim Injunction as the Eighteenth Defendant.

17. A further half-day listing was secured for the morning of 20 December 2024. At that hearing, Mr Justice Bourne granted the relief sought. I exhibit a copy of that Order at **MS4/20 – 36**. A return date was set for 24 January 2025, with a one-day time estimate.

18. The return date was listed before Mrs Justice Tipples. On Friday 24 January 2025, Mrs Justice Tipples continued the interim relief and alternative service order granted by Mr Justice Bourne (without amendment), permitted the addition of seven further Named Defendants and extended the scope of the interim relief to cover those persons (that being

the Twelfth to Eighteenth Defendants, inclusive), and set directions to the final hearing. As the Claim includes categories of Persons Unknown, a listing date (rather than a window) was fixed for the disposal of the Claim against the Named Defendants and the review of the Order against Persons Unknown.

19. The sealed Interim Injunction was received from the Court on Monday 27 January 2025, and served by the Claimant in accordance with the provisions of the alternative service order on the same day.

Mary Ensell and Harry Wade

20. On 28 January 2025, Ms Ensell and Mr Wade undertook acts of direct-action protest that breached the terms of the Interim Injunction. I shall further explain the actions of Ms Ensell and Mr Wade below. The Claimant is now in the process of gathering the necessary evidence to support possible proceedings to enforce the Interim Injunction. I am cautious about prejudicing any enforcement action, so at this time say only that the Claimant's view is that Ms Ensell and Mr Wade are likely to be in breach of paragraphs 2(i), 2(ii), 2(iii) and 2(vi) of the Injunction Order, and possibly also paragraph 2(v).

21. As Ms Ensell and Mr Wade have been identified, and as their actions fall squarely within the conduct that is prohibited by the Interim Injunction, the Claimant now seeks to add them as Named Defendants to the Claim and interim relief (in accordance with the various guidance from the Court of Appeal and Supreme Court that requires the same).

28 January 2025

22. I have compiled the following summary of events from information passed to me by the Site Manager and other employees at the Shipley Site; all of the photographs referred to were also sent to me by those persons, unless I state otherwise.

23. At around 05:00 on Tuesday 28 January 2025, a Vauxhall Vivaro van (which is a Transit-style van) was deliberately driven at speed into the yellow retractable bollards that protect the front gate to the Shipley Site. The force of the impact damaged two bollards, and the van came to rest on top of one (partially collapsed) bollard. I exhibit at **MS4/37** a

photograph that shows the van having crashed into the bollards, and at **MS4/38** a photograph of the collapsed bollard underneath the van. The van was blocking all vehicular access to the Shipley Site, and an unknown liquid (which was not thought to be harmful) was leaking from the van.

24. CCTV footage from the Shipley Site shows one person leaving the van from the driver's seat after it has crashed; they then leave the scene in a support vehicle (a hatchback style car). That person has not been identified; my firm has made several enquiries with West Yorkshire Police, as I believe that the current CPR 31.17 Order (exhibited at **MS4/39 – 42**) entitles the Claimant to be informed of the identity of that person if West Yorkshire Police were aware of the same but, so far, no response has been received. Two people appear to leave the hatchback car before it drives away; it is now known that these people were Ms Ensell and Mr Wade. Ms Ensell and Mr Wade then proceeded to 'lock-on' to the van. I have viewed the CCTV footage myself but, in the interest of proportionality, do not exhibit the same to this witness statement; I believe and hope that the photographic evidence should be sufficient for the purposes of this Application.

25. The 'lock-on' was quite elaborate, and pre-meditated, and the van was specially modified to facilitate it. The van was reinforced with concrete, and an opening was made in the side of the van into the concrete block. Ms Ensell and Mr Wade inserted their arms into the openings, and somehow affixed themselves. I exhibit at **MS4/43** a photograph that shows the inside of the van, with the concrete reinforcement, and at **MS4/44** a photograph of the tube-like opening in the side of the van (these photographs are taken after Ms Ensell and Mr Wade had been released from the lock-on, so there is damage visible to the lock-on device and van).

26. I exhibit at **MS4/45** a photograph of Ms Ensell locked-on to the van; her arm is in the tube-like opening into the van. I exhibit at **MS4/46** photograph of Mr Wade locked-on to the van; his arm is in the tube-like opening into the van.

27. I am informed by staff at the Shipley Site that Ms Ensell and Mr Wade were released from the lock-on at approximately 12:30 (that being some 7.5 hours after the incident started), and that the police used heavy-duty power tools to cut through the van and concrete (the damage to the van being visible in the exhibited photographs). I now understand from the

initial disclosure from West Yorkshire Police (made pursuant to the CR 31.17 Order) that Ms Ensell and Mr Wade in fact self-released from the lock-on, before they were released by the police.

28. Throughout the period of the lock-on and until the van was removed from the bollard, vehicular access to the Shipley Site was blocked, and all staff had to enter and leave on foot. I exhibit at **MS4/47** a photograph of Ms Ensell being led away from the van by police officers; her right wrist appears to be bound by a chain, which appears to be the remnants of the locking-on device. I exhibit at **MS4/48** a photograph of Mr Wade being led away from the van by police officers; his left wrist appears to be bound by a chain, which appears to be the remnants of the locking-on device.

29. The Site Manager at the Shipley Site informs me that when police officers searched the van, a large tin of cooking oil was recovered. I understand from Nicholas Wargent (a director of the Claimant, who has made witness statements in these proceedings) that on previous occasions when protestors have broken into the Claimant's sites, they have covered surfaces with an oil like substance to hinder the efforts of police who are trying to reach and retrieve them.

30. Ms Ensell and Mr Wade were arrested by West Yorkshire Police, but I do not have any further detail in that regard at this time.

31. I am informed by the Site Manager at the Shipley Site that the impact of this incident included: damage to two bollards (which were replaced overnight on 28 January at a cost of £3,402.16), disruption to deliveries at the Site, disruption and distress caused to staff at the Site (including to a member of staff who is disabled, and who had to be assisted with walking to the Site), and also disruption to neighbouring businesses by reason of the significant response and presence of the police and ambulance services. Further, staff were distressed at having to walk past the protestors – they are fearful of being identified by members of the protest groups, as in the past when the name of a staff member has become known, they have then received target abuse.

32. Lastly, I am informed by staff at the Shipley Site that a small peaceful protest formed on Acorn Park during the course of the lock-on incident (that being the road on which the

Shipley Site is located). This protest was peaceful and did not breach the terms of the Interim Injunction; no complaint is made in relation to this protest or these protestors.

33. Ms Ensell and Mr Wade's identities were not known to the Claimant at the time of the incident. Their identities (and addresses) became known to the Claimant on 29 January 2025, when West Yorkshire Police disclosed the same pursuant to the CPR 31.17 Order.

Palestine Action

34. Ms Ensell and Mr Wade appear to have been acting under the banner of the Palestine Action protest group (which is one of the two main groups that are of concern to the Claimant, as explained in detail in the evidence in the Claim). I exhibit at **MS/49 – 50** a copy of the news item on the Palestine Action website, that describes the incident on 28 January 2025. In the photograph that accompanies the news item, five police officers who are wearing protective clothing can be seen looking inside the van.

35. Further, I exhibit at **MS4/51 – 60** a copy of a post made to the Palestine Action Instagram page on 28 January 2025 (this is a pinned post that appears at the top of the group's Instagram page), which includes several photos. I note that as well as showing Ms Ensell and Mr Wade, those photos show the size of the disc cutter that the police were required to use when trying to free Ms Ensell and Mr Wade, as well as the large tin of cooking oil that was recovered.

36. Whilst in the interests of proportionality I do not exhibit the following, I note that the Palestine Action Instagram page also contains a pinned post which is a video, and which shows the van being driven at speed into the bollards. The video then proceeds to show a piece to camera by Mr Wade as he is locked-on to the van. The video can be viewed here: https://www.instagram.com/share/BAJ_0XLKwP.

Timing of this Application

37. The Claimant had hoped to make this Application sooner, but has been waiting on West Yorkshire Police to respond to my firm's enquiries as to the likely identity of the driver of the van on 28 January 2025. As that information has not yet been forthcoming, the Claimant

has elected to make this Application rather than delay further, so that Ms Ensell and Mr Wade can be given the same directions and timetable as all other Named Defendants. In the circumstances, I submit that the Claimant has made the Application with sufficient promptness, such that it can be dealt with on the papers (as the Interim Injunction, and the proportionality of the relief therein (where applicable) has been considered very recently).

38. If it becomes necessary to do so, a further Application may need to be made in relation to the van driver. It is likely that, to fit them within the same timetable of directions, it will not be possible to give them the same long window to acknowledge service that is enjoyed by the other Named Defendants.

Conclusion

39. By reason of their actions on 28 January 2025, and subsequent identification, the Claimant seeks to add Ms Ensell and Mr Wade as Named Defendants to the Claim, and to the scope of the Interim Injunction. Ms Ensell and Mr Wade are clearly minded to engage in acts of unlawful direct-action protest against the Claimant under the banner of Palestine Action, and the Claimant apprehends, on the basis of their past behaviour, that absent injunctive relief, Ms Ensell and Mr Wade will commit further acts of unlawful direct-action protest at the Claimant's sites.

Statement of Truth

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

M Singh

…….
Manan Singh
Dated this 13 day of February 2025

IN THE HIGH COURT OF JUSTICE **CLAIM NO. KB-2024-004175**
KING'S BENCH DIVISION

B E T W E E N :

TELEDYNE UK LIMITED

Claimant

-and-

(1) JULIAN ALLEN GAO

(2) – (7) OTHER NAMED DEFENDANTS

(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);**

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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) – (18) OTHER NAMED DEFENDANTS

Defendants

EXHIBIT MS4

This is Exhibit MS4 referred to in the Fourth Witness Statement of Manan Singh.

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 :

HIGH COURT OF JUSTICE
27-Jan-25
QUEEN'S BENCH DIVISION

KB-2024-004175

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

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

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 (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 Annexe1 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; actions@palestineaction.org;
media@palestinecampaign.org; branches@palestinecampaign.org;

info@palestinecampaign.org; palestinesolidaritybradford@gmail.com; pscchelmsford@gmail.com; lincolnpalestine@gmail.com; liverpoolfopal@gmail.com; pscshrop@gmail.com; bfdfriendsofpalestine@yahoo.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.

17. All communications with the Court about this Order should be sent to 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

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Title Number: WYK387275

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Plotted Scale - 1:1250. Paper Size – A4

Title Number: WYK387275

ANNEXE 2 – LINCOLN SITE

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Plotted Scale - 1:1250. Paper Size – A4

Title Number: LL317736

ANNEXE 3 – WIRRAL SITE

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Title Number: MS575234

ANNEXE 4 – CHELMSFORD SITE

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Title Number: EX688035

ANNEXE 5 – PRESTEIGNE SITE

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Title Number: CYM839162

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Plotted Scale – 1:750. Paper Size – A4

Title Number: WA552132

ANNEXE 6 – NEWBURY SITE

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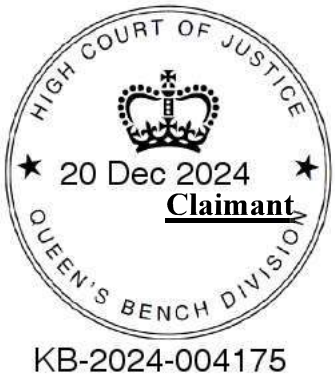
Title Number: BK365055

IN THE HIGH COURT OF JUSTICE **CLAIM NO. KB-2024-004175**
KING'S BENCH DIVISION

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

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

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 Annexe1 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

info@palestineaction.org; actions@palestineaction.org;
media@palestinecampaign.org; branches@palestinecampaign.org;
info@palestinecampaign.org; palestinesolidaritybradford@gmail.com;
pscchelmsford@gmail.com; lincolnpalestine@gmail.com;
liverpoolfopal@gmail.com; pscshrop@gmail.com;
bfdfriendsofpalestine@yahoo.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 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.

13. All communications with the Court about this Order should be sent to 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

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Title Number: WYK387275

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Plotted Scale - 1:1250. Paper Size – A4

Title Number: WYK367275

ANNEXE 2 – LINCOLN SITE

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Plotted Scale - 1:1250. Paper Size – A4

Title Number: LL317736

ANNEXE 3 – WIRRAL SITE

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Plotted Scale - 1:1250. Paper Size – A4

Title Number: MS575234

ANNEXE 4 – CHELMSFORD SITE

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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

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Plotted Scale - 1:750. Paper Size – A4

Title Number: WA552132

ANNEXE 6 – NEWBURY SITE

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Plotted Scale - 1:750. Paper Size – A4

Title Number: BK365055

SC08 CWN

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

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 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/typed 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 20th 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 IJF (Ref: TEL14/40)

TELEDYNE
STOP SUPPORTING
the land grab
the Zionists'
Holocaust
GAZA
ILLEGAL
OCCUPATION
ARMS TO

SC08 CWN

ICE
AMBULAN

PALESTINE ACTION CRASH INTO THE FRONT OF TELEDYNE'S WEAPONS FACTORY IN SHIPLEY

Jan 28, 2025

Images and videos are available for free, with the relevant credit

From 5AM today, Palestine Action crashed a van into the front of Teledyne Defence and Space in Shipley. Activists then attached themselves to the vehicle in order to shut down the factory and disrupt shipments of weapons parts to be used against the people of Palestine and Lebanon.

The site was previously targeted twice by Palestine Action with rooftop occupations involving dismantling the factory. Before then, Palestine Action dismantled its 'Teledyne Labtech' factory at Presteigne, Wales, in 2022 where it caused £1m in losses.

The site, between 2009 and 2014, was granted at least 86 licenses for the export of weapons to Israel – mostly for 'ML11-category military electronics equipment and 'ML4' category explosive weapons, munitions, or parts therefor. After 2014, the company's sales and licensing were handled by the parent company 'Teledyne UK', which continued to export vast quantities of ML4 and ML11 weapons to Israel as part of its 48 export licenses granted between 2014 and 2020.

The American company Teledyne has a $5.6bn yearly turnover and is, along with its subsidiary ev2, the largest exporter (by volume of licenses granted) of weaponry from Britain to Israel. A significant proportion of the company's almost 200 export licenses for weapons and weapons parts to the US, 2009-2020, will also form into finished products ultimately exported to Israel.

Teledyne Defence and Space, Shipley, manufactures critical components for missile systems – specifically missile filters – which will comprise the ML4 exports made yearly from the site. Teledyne Defence and Space boasts of its involvement with missile products procured by Israel, including the AGM-Harpoon, AIM-120 AMRAAM, and AGM-114 Hellfire missiles deployed by Israel against Gaza – the latter reportedly being used to strike Al-Shifa hospital. Teledyne Defence and Space also produces components for the American's Tomahawk and Patriot missiles, deployed by US forces against Yemen.

The company also produces parts, including filters and multi-function assemblies, for UAVs (drones), aircraft, and radar systems, including the AN/APG-81 (AESA) type fitted in Lockheed Martin F-35 Fighter

jets. Teledyne Defence and Space, solely based in Shipley, has sales representatives in Tel Aviv. Shipley-made products can be seen advertised by Ormic Components, the sales company for the Israeli military market. Teledyne, the parent company, also produces image sensors for military applications and radar technologies around the borders of the occupied West Bank and Gaza while also providing armed UAVs to Israel as far back as 1973.

A recent investigation by Declassified also uncovered two shipments from the Teledyne Shipley site which were addressed "to a location near the Israeli air force's (IAF) Hatzerim air base in the Negev desert, which houses fighter jets as well as the IAF Flight Academy".

A Palestine Action spokesperson said: "We are more committed than ever before to disrupting the production of weapons used to massacre our brothers and sisters in Palestine. Whilst our government remains an active participant in Israeli war crimes, it's the duty of ordinary people to take direct action to shut down the merchants of death."

ENDS

NOTES TO EDITORS

If you would like any further information on Palestine action, please contact media@palestineaction.org

Palestine Action is a direct-action network of groups and individuals formed with the mandate of taking direct action against Elbit Systems' UK locations at grassroots level, calling for them all to be shut down and for the British government to end its complicity in Israeli apartheid.

pal_action and **3 others**
Shipley, Bradford, United Kingdom

pal_action Palestine Action shut down the production of crucial components for Israeli missiles and fighter jets today!

By securing themselves to a reinforced van which was crashed into the front of a factory, the police were unable to remove our actionists for eight hours.

Whilst Teledyne's Shipley factory need masses of technology to produce their weaponry, we only need dedication to shut them down.

Elsewhere, over 15 actions were taken across Europe against Allianz, the insurers of Israeli weapons firm Elbit Systems.

Together, we will defeat the Israeli weapons industry once and for all.

Images by @imdmilo

2 w

silverfox99999 Putting bodies on the line for Palestine PS never give up! Thank you for your steadfast activism ❤️🖤🤍💚

57,956 likes
28 January

Add a comment...

SC08

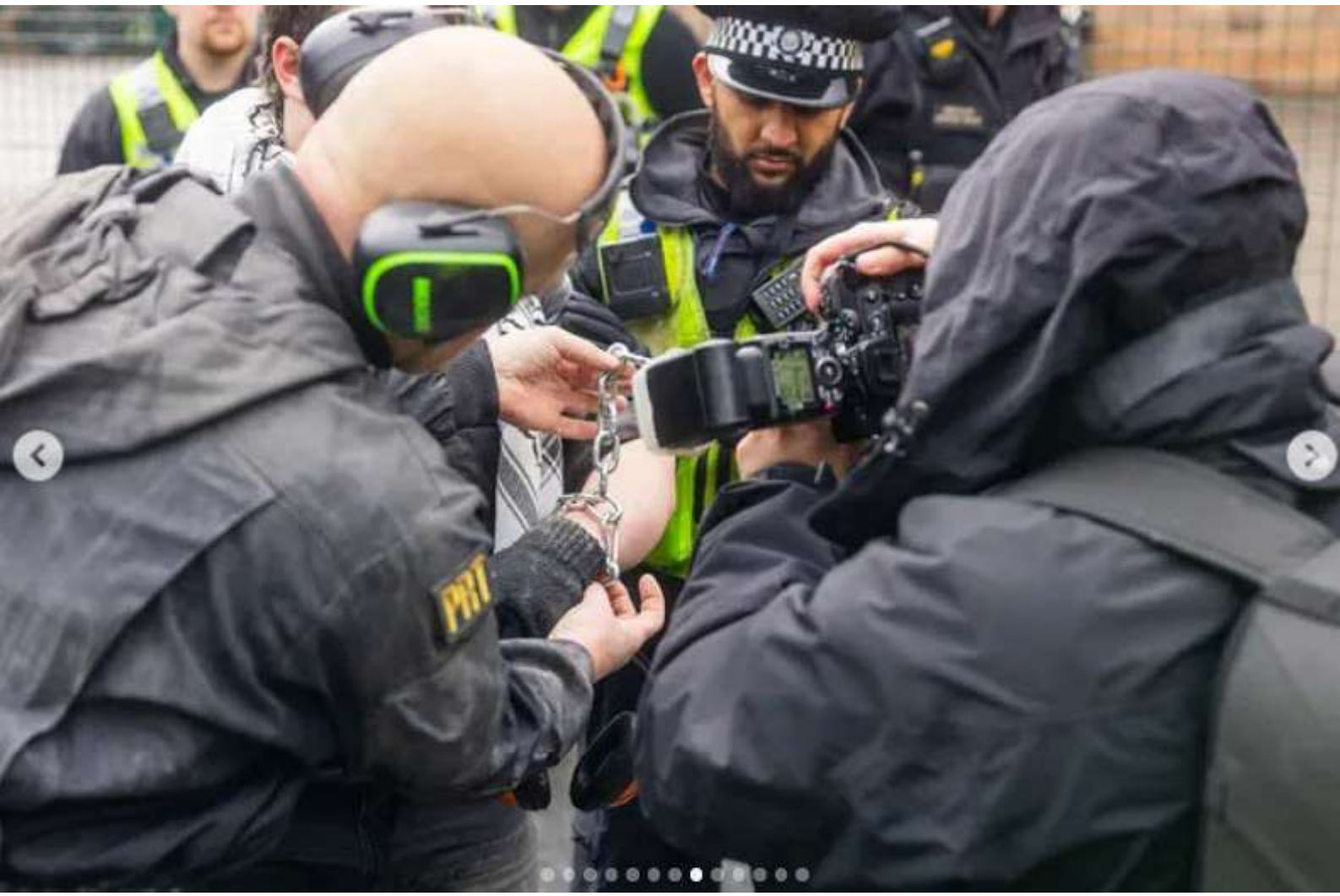
STIHL

HTC
Vegetable
COOKING OIL

Teledyne....
STOP
KILLING
KIDS &
STOP
ARMING
ISRAEL

AMBU NCE

POLICE



Teledyne
STOP
KILLING
KIDS &
STOP
ARMING
ISRAEL
NEVER AGAIN
FOR
ANYONE
FREE
PALESTINE

VAUXHALL
SC08 CWN

IN THE HIGH COURT OF JUSTICE **CLAIM NO. KB-2024-004175**
KING'S BENCH DIVISION

B E T W E E N :

TELEDYNE UK LIMITED

Claimant

-and-

(1) JULIAN ALLEN GAO

(2) – (7) OTHER NAMED DEFENDANTS

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

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

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FROM THE 'SHIPLEY SITE' (TELEDYNE UK LIMITED, AIREDALE HOUSE, ACORN PARK, SHIPLEY BD17 7SW)

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(12) – (18) OTHER NAMED DEFENDANTS

Defendants

FIFTH 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.
2. 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.
3. I make this witness statement in connection with the Claimant's Application dated 13 February 2025 which seeks to add two further persons (namely **Mary Ensell** and **Harry Wade**) as Named Defendants to the Claim.
4. This witness statement is made pursuant to directions issued by the Court, received by the Claimant's solicitors on 18 March 2025, which state as follows: *"Please ask the Claimant's solicitors to provide (i) further to paragraph 6 of the witness statement of Manan Singh dated 13 February 2025, a witness statement as to proof of service of the application on the proposed two additional Defendants; and (ii) a draft order which (unlike the present draft) has Annexes which are not blank."*

5. I exhibit to this witness statement a bundle of documents marked **MS5**. All references to that exhibit are in the format **MS5/page number.**
6. Accordingly, exhibited at **MS5/1 – 4** is the certificate of service, which has been duly filed with the Court as evidence of service of the application and supporting documents on the two proposed additional Defendants, Mary Ensell and Harry Wade. The documents were served by first-class post.
7. Further, exhibited at **MS5/5 – 6** are copies of the letters of service sent by first-class post to each of the proposed additional Defendants. These letters specify the documents enclosed with each service which were sent to each individual.
8. In light of the above, we respectfully invite the Court to grant the application.

Statement of Truth

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

M Singh

…….

Manan Singh
Dated this 18th day of March 2025

IN THE HIGH COURT OF JUSTICE **CLAIM NO. KB-2024-004175**
KING'S BENCH DIVISION

B E T W E E N :

TELEDYNE UK LIMITED

Claimant

-and-

(1) JULIAN ALLEN GAO

(2) – (7) OTHER NAMED DEFENDANTS

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(12) – (18) OTHER NAMED DEFENDANTS

Defendants

EXHIBIT MS5

This is Exhibit MS5 referred to in the Fifth Witness Statement of Manan Singh.

Certificate of service

Name of court	Claim No.
High Court of Justice Kings Bench Division	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? 13/02/2025

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).

See Schedule 2 Attached

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

- [x] 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
- [x] defendant's
- [ ] solicitor's
- [ ] litigation friend

- [x] usual residence
- [x] 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: 17/02/2025

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Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules (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)

Method of service	**Deemed day of service**
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 Tipples J dated 24 January 2025
2. Application Notice
3. Draft Order
4. Fourth Witness Statement of Manan Singh
5. Exhibit MS4
6. Draft Re-Amended Claim Form
7. 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

KEYSTONE LAW

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www.keystonelaw.com

Mary Ensell
24 Aylton Road
Huyton
Merseyside
L36 2LU

Our ref: TEL14/40
020 3319 3700
info.teledyne@keystonelaw.co.uk

13 February 2025

BY FIRST CLASS POSTAGE

Dear Sirs,

TELEDYNE UK LIMITED v JULIAN ALLEN GAO, RUBY HAMILL, DANIEL JONES, NAJAM SHAH, RICKY SOUTHALL, and Others
Claim No. KB-2024-004175

We act for the Claimant, Teledyne UK Limited in the abovementioned High Court Proceedings.

Please find enclosed by way of service on you, our client's application to add you to these proceedings following your breach of the interim injunction order of Tipples J. This comprises of the following documents:

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2. Application Notice
3. Draft Order
4. Fourth Witness Statement of Manan Singh
5. Exhibit MS4
6. Draft Re-Amended Claim Form
7. Response Pack

Please note the final hearing of this Claim is listed to be heard on 25 July 2025 at the Royal Courts of Justice, Strand, London.

We advise that you seek legal advice.

Yours faithfully,

Keystone Law

Keystone Law
Encs.

Keystone Law is a trading name of Keystone Law Limited, a company authorised and regulated by the Solicitors hority with its registered office at First Floor, 48 Chancery Lane, London WC2A 1JF, Unit ngdom. Company number: 4650763. VAT number: GB 200 7302 72. SRA number: 400999. A list of the directors of Ke pen to inspection at the registered office.

KEYSTONE LAW

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Harry Wade
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Wisbech
Cambridgeshire
PE13 1RU

Our ref: TEL14/40
020 3319 3700
info.teledyne@keystonelaw.co.uk

13 February 2025

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Docusign Envelope ID: 64118BFE-269A-4BBF-A9FF-F7F855F201C3

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

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(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

FIRST WITNESS STATEMENT OF SCOTT DOUGLAS PATTERSON

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

1. I am employed by the Claimant, Teledyne UK Limited **('Teledyne UK')** as the Site Director of the Shipley Site (defined in these proceedings as Teledyne UK Limited, Airedale House, Acorn Park, Shipley, West Yorkshire BD17 7SW).

2. I make this witness statement pursuant to paragraph 9 of the Order of Tipples J dated 24 January 2025, and paragraph 9 of the Order of Murray J dated 21 March 2025, both of which require Teledyne UK to file and serve any further evidence upon which it will rely at the final hearing of the Claim against the Named Defendants and at the review of the Order against Persons Unknown by 29 May 2025.

3. The facts and matters set out in this statement are within my own knowledge unless otherwise stated, and I believe them to be true. Where I refer to information supplied by others, the source of the information is identified; facts and matters derived from other sources are true to the best of my knowledge and belief. This witness statement has been made following conference and consultation with Teledyne UK's legal advisers.

4. There is now produced and shown to me a paginated bundle of true copy documents marked **SDP1**. All references to that bundle are in the format **SDP1/page number.**

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Scope of this statement

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

   i. additional information on the Shipley Site;

   ii. further details on incidents of protest at the Shipley Site;

   iii. observations on the effectiveness of the injunction.

6. To assist the Named Defendants, specific evidence in relation to each can be found in the following paragraphs:

   i. D1 Julian Allen Gao: paragraphs 25 to 34;
   ii. D2 Ruby Hamill: paragraphs 25 to 34;
   iii. D3 Daniel Jones: paragraphs 25 to 34;
   iv. D4 Najam Shah: paragraphs 25 to 34;
   v. D5 Ricky Southall: paragraphs 35 to 45;
   vi. D6 Amareen Afzal: paragraphs 35 to 45;
   vii. D7 Serena Fenton: paragraphs 35 to 45;
   viii. D19 Mary Ensell: paragraphs 46 to 66;
   ix. D20 Harry Wade: paragraphs 46 to 66.

ADDITIONAL INFORMATION ON THE SHIPLEY SITE

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

Rear fencing and public footpath

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

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

9. As can be seen from the satellite views annexed to the injunction order (see **SDP1/3**), at the rear of the Shipley Site, there is a wooded area. That wooded area sits between the river bank and the rear of the operational area of the Shipley Site, and is within in the freehold title to the site. The fencing at the rear of the Shipley Site fences off the operational area of the Shipley Site, and sits just back from the wooded area. As such, the wooded area is accessible to the public, and is not fenced off.

10. The fencing at the rear of the Shipley Site which excludes the public from the operational area of the site is link fencing with barbed wire on top; there can be no confusion that the public are excluded from the operational area of the Shipley Site.

11. The location of the fencing, and the wooded area, can be seen on the satellite view map exhibited at **SDP1/4**. This is the map that Teledyne UK have produced to show where the injunction signs have been placed on the perimeter of the Shipley Site (marked by the yellow dots). To the rear of the Shipley Site, two red lines can be seen. The furthest line marks the freehold boundary to the site and runs through the River Aire. The line closest to the operational area of the Shipley Site shows the location of the fencing (to which injunction signs have been attached). The wooded area can also be seen (in which two injunction signs have also been erected).

12. Through the wooded area, there is a public right of way; this is why the wooded area is not fenced off in the same way that the operational area of the Shipley Site is. Referring again to the Land Registry title plan at **SDP1/1 – 2**, the footpath is marked by the dashed line that runs parallel with the River Aire. That footpath is outside of the operational area of the Shipley Site (it being in the wooded area), and is outside of the fenced area of the Shipley Site (ie. it is accessible by the public, as is required by law).

13. I exhibit at **SDP1/5 – 7** the plan of the adopted highways, produced by the City of Bradford Metropolitan District Council (the local highway authority). That plan shows public rights of way, marked in purple. The right of way that runs at the rear of the Shipley Site and

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

The front of the Shipley Site

14. I have made an affidavit in a contempt application in relation to alleged breaches of the injunction by D19 Mary Ensell and D20 Harry Wade. In that affidavit, I explained in detail the location and positioning of the boundary to the Shipley Site at the front of the site. I shall explain the same here.

15. Referring again to the Land Registry title plan of the Shipley Site exhibited at **SDP1/1 – 2**, the vehicular access to the Shipley Site can be seen on the north-west elevation of the Site; the access is off Acorn Park, and is where there is a slight curvature to the red line. This is the only vehicular access to the Site. There is a pedestrian gate to the left of the vehicular gate (if you are facing the gates from Acorn Park). As can be seen, the red-line boundary of the freehold title excludes the pavements (denoted by the dashed lines) that are adjacent to Acorn Park, but includes the pavements that are on the short access road into the Shipley Site. The red-line boundary of the freehold title runs almost (but not quite) up to the bell-mouth of the short access road, and tracks the back edge of the pavement adjacent to Acorn Park.

16. The fencing at the front of the Shipley Site adjacent to Acorn Park, with the exception of the gate (as I shall explain below) and therefore also the fencing at the front of the Site perpendicular to Acorn Park and leading towards the gate, tracks the red-line boundary to the Site.

17. Referring again to the plan of the adopted highways around the Shipley Site, exhibited at **SDP1/7**, that plan shows the adopted highway in yellow, which includes Acorn Park. At the front of the Shipley Site, the extent of the highway appears to follow the same line as the boundary to the freehold title of the Shipley Site. Accordingly, none of the land within

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

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

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

20. Accordingly, it follows that:

    i. there is an area in front of the vehicular gate to the Shipley Site that is within the freehold title to the Shipley Site; but

    ii. the area at the junction of Acorn Park and the access road to the Shipley Site sits outside of the freehold title to the Shipley Site, and is adopted highway.

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

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

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

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

PROTESTS AT THE SHIPLEY SITE

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

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

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

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

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

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

28. Other Teledyne UK staff started arriving at the Shipley Site from around 6am, and I arrived at the site at approximately 7am (as I usually would), upon which I took over the co-ordination of Teledyne UK's response to the incident. By the time of my arrival, there was already a significant police presence at the Shipley Site.

29. Whilst the Defendants were on the roof of the building, I observed them using sledgehammers, crowbars and other similar tools to damage the roof of the building. One of the areas in the building below that was damaged by the falling roof debris was the 'Clean Room', which is a sensitive area of the site in which production occurs. I understand that Mr Wargent has already exhibited the photographs of the damage caused by the Defendants to his first witness statement, so I will not re-exhibit those here. I also observed the Defendants throwing roof tiles; this was especially concerning as they were throwing the tiles towards and on to high pressure gas cylinders. If damaged, those gas cylinders could be a major hazard and risk to safety (I note that a gas cylinder is visible in exhibit NJW1/187 to Mr Wargent's first statement, which is a still CCTV image from the Shipley Site).

30. The incident lasted for approximately 16 hours in total, and my observation was that the Defendants continued to damage the roof for several hours before downing tools and then just sitting on the roof.

31. I estimate that, at the height of the incident, there were approximately 40 police officers at the Shipley Site. It appeared to me that there were a wide range of specialist officers, including a working at heights team and drone operators, as well as officers who were generally securing and controlling the scene on the ground. I also recall there being four ambulances (one for each Defendant on the roof), as well as a fire engine in attendance (which had a platform lift on the appliance).

32. The police officers in attendance did not climb onto the roof to retrieve the Defendants. I understood from the officers in attendance that they considered the damage so extensive, that the roof was not safe. Eventually, after negotiation, the Defendants came down from

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

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

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

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

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

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36. The incident started at approximately 4.30am, when four protestors attended the Shipley Site. I now know these persons to be the Fifth to Seventh Defendants (inclusive), plus one additional person who has not been named as a defendant in these proceedings. On this occasion, the Defendants gained access to the Shipley Site by climbing over the fence to the Shipley Site on the western boundary – where the aforementioned footpath is that runs down to and meets up with the river path. The Defendants used a ladder to scale the fence, and placed a thin mattress-type object over the barbed wire on top of the fence to allow them to climb over it.

37. Once on the Shipley Site, the Defendants ran across the car park, up a fire escape, and then used a short ladder to reach the roof a modular building on the site. Security staff at the Shipley Site detected the intrusion, and I understand that they saw the Defendants climb on to the roof, and called the police immediately.

38. As with the first incident, other Teledyne UK staff started to arrive at the Shipley Site from around 6am and I arrived at the site at approximately 7am (as I usually would), upon which I took over the co-ordination of Teledyne UK's response to the incident. By the time of my arrival, there was already a significant police presence at the Shipley Site.

39. When the Defendants were on the roof of the building, I observed them using hammers and similar tools to damage the roof, hanging flags and banners from the roof and also using spray paint to graffiti the building. I understand that Mr Wargent has already exhibited photographs of the damage caused by the Defendants to his first witness statement, so I will not re-exhibit those here.

40. I was also alarmed to observe the Defendants throwing fireworks from the roof; these were thrown at police officers on the ground, as well as into the modular building on which the Defendants were standing. This struck me as especially reckless and dangerous, and thankfully nobody was hurt, and no fire was caused.

41. I estimate that, at the height of the incident, there were again approximately 40 police officers at the Shipley Site. It appeared to me that there were a wide range of specialist officers, including a working at heights team and drone operators, as well as officers who were generally securing and controlling the scene on the ground. I also recall there being

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

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

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

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

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

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

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

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

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48. In the interests of proportionality, I will not exhibit the CCTV video evidence (as I have in the contempt application), but will instead exhibit still images.

49. On 28 January 2025, shortly before 5am, a white Vauxhall Vivaro van (which is a Transit-style van) was deliberately driven at speed at the yellow retractable bollards that sit in front of the gate to the Shipley Site. At the time of the incident, the bollards were upright and protecting the gate. The impact of the van damaged two bollards, with one bollard partially collapsing and the van coming to rest on top of the bollard. The vehicular access to the site (and egress) was completely blocked by the van. Immediately after the van crashed, two people who had arrived in a support vehicle and who had been observing the van crash, and who I now know to be **D19 Mary Ensell** and **D20 Harry Wade**, proceeded to-lock on to the van, where they remained until approximately 12.30pm. The driver of the van made off in the support vehicle and has never been identified.

50. I was not at the Shipley Site at the time the van crashed, or when the lock-on started. I arrived at the Shipley Site at around 7.25am, upon which I took over the co-ordination of Teledyne UK's response to the incident. There was already a significant police presence at the Shipley Site when I arrived, the security staff having called them immediately upon the van crashing. I have reviewed the CCTV and seen the van crash, and the events that occurred immediately after that (which videos are all exhibited to my affidavit in the contempt application).

51. My review of the CCTV footage, and the reports that I have received from the security staff and other colleagues at the Shipley Site who were present before 7.25am, can be summarised as follows.

52. The van and support vehicle arrived at the Shipley Site just before 5am. The support vehicle (a hatch-back style car) parked-up, and the Defendants exited the vehicle, whilst the van was manoeuvred into position so that it faced head-on the yellow bollards protecting the gate to the Shipley Site. The van was then driven at speed at the bollards as described above. After crashing the van, the driver of the van then exited the vehicle and, within a few minutes, the driver left the scene in the support vehicle. Ms Ensell and Mr Wade, having observed the van crash, then proceed to 'lock-on' to the van. The lock-on was pre-meditated, and must have required a lot of planning. The van had been reinforced with

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

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

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

    i. **SDP1/15 – 16,** are two photographs which show where the van has come to rest, having crashed into the bollards;

    ii. **SDP1/17,** which is captured from underneath the van, and shows the partially collapsed bollard, on which the van has come to rest. As can be seen from the photograph, the van is effectively wedged on the bollard, and it would not be able to reverse back without damaging the underneath of the van further;

    iii. **SDP1/18**, which is taken from the driver's front door of the van, looking into the back of the van. This photograph shows the wooden-structure filled with concrete.

    iv. **SDP1/19** shows **Ms Ensell** sitting on the ground next to the rear driver's side wheel of the van. She is wearing a dark coat with the hood up, and a peaked cap. The lower half of Ms Ensell's body is covered by what appears to be a homemade protest poster. The poster includes a number of hand drawn swastika symbols. Her right arm is inserted into the tube-like opening in the van. In the bottom left corner of the photograph an orange bag is visible, as well as a white powder-like substance on the ground around the back of the van; this is the sand that was used to contain the fluid leakage that I have mentioned above;

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v. **SDP1/20** shows **Ms Ensell** in the same position as described above, but I have taken this photograph as a close-up shot of Ms Ensell (and slightly later in the morning, as is clear from the lighter sky). Ms Ensell's face is partially visible in this photograph, and she appears to have long blonde hair;

vi. **SDP1/21** shows **Mr Wade** sitting on the ground next to the rear passenger side wheel of the van. Mr Wade is wearing dark clothing, but his face and head are uncovered and he is looking directly at the camera. He has short hair on one side of his head, and longer hair with blue/green tinting on the other side. Mr Wade's left arm is inserted into the tube-like opening in the van. Again, the white sand used to contain the fluid leakage from the van can be seen on the ground around the rear of the van.

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

i. **SDP1/22** is taken from the rear of the van. The rear doors are open, and the concrete block can be seen. The concrete has been damaged by police officers, who had been working with heavy duty power tools to release Ms Ensell and Mr Wade (discarded concrete can be seen on the floor around the van); and

ii. **SDP1/23** is taken from the side of the van and shows the black tube-like opening into which either Ms Ensell or Mr Wade inserted their arm. It is not obvious from which side of the van this photograph is taken but, when compared to the photograph of Mr Wade during the lock-on, it appears that this photograph is most likely the passenger side of the van. The police have needed to cause significant damage to the van when working to free Mr Wade or Ms Ensell (they have cut away some of the body work of the van).

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

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

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

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

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

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

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

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

Impact of the incident

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

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

    i. disruption to staff access at the Shipley Site. Approximately 100 staff work at the Shipley Site on a day-to-day basis, the majority of whom arrive by car. Staff were unable to access the site by vehicle throughout the course of the incident, and were forced to park away from the site and enter by foot. As Acorn Park was disrupted because of the incident and significant presence of the emergency services, some staff were forced to park around a 5 minute walk from the site. For most staff, this was an inconvenience. However, for one member of staff who has a disability, the inability to access the site by vehicle was especially problematic and distressing. They were forced to park away from the site and be assisted into work by colleagues. Ultimately, all staff were able to access the site on foot, and were on site by around 8:30am. Therefore, the start of the working day at the site was delayed and disrupted, but the day-to-day business of the site could be conducted; relatedly

    ii. the displacement of the parked Teledyne UK staff cars onto surrounding roads would likely have caused inconvenience to our neighbours and other road users;

    iii. delivery vehicles were unable to access the Shipley Site. However, as the delivery vehicles were able to park reasonably close by, staff from the Shipley Site were able

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

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

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

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

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

18 February 2025: Persons Unknown

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

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

OBSERVATIONS ON THE EFFECTIVENESS OF THE INJUNCTION

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

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

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

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

Statement of Truth

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

Signed by:
Scott Patterson
31711AE08EA84E4...

Scott Douglas Patterson
Dated this 21 day of May 2025

IN THE HIGH COURT OF JUSTICE **Claim No. KB-2024-004175**
KING'S BENCH DIVISION

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

EXHIBIT SDP1

This is Exhibit SDP1 referred to in the First Witness Statement of Scott Douglas Patterson.

Land Registry

10 September 2024

Your ref
TEL14.23

Our ref
WYK387275/OC/113

HM Land Registry
Durham Office
PO Box 75
Gloucester
GL14 9BD

DX 321601 Gloucester 33
Tel 0300 006 0010
Fax NA
Email durham.office@
landregistry.gov.uk
www.gov.uk/land-registry

Official copy/copies

HM Land Registry payment ref 10/09 Z0NE3PNF
Fee debited £3.00

The official copy/copies of the title plan or certificate in form CI you applied for is/are enclosed.

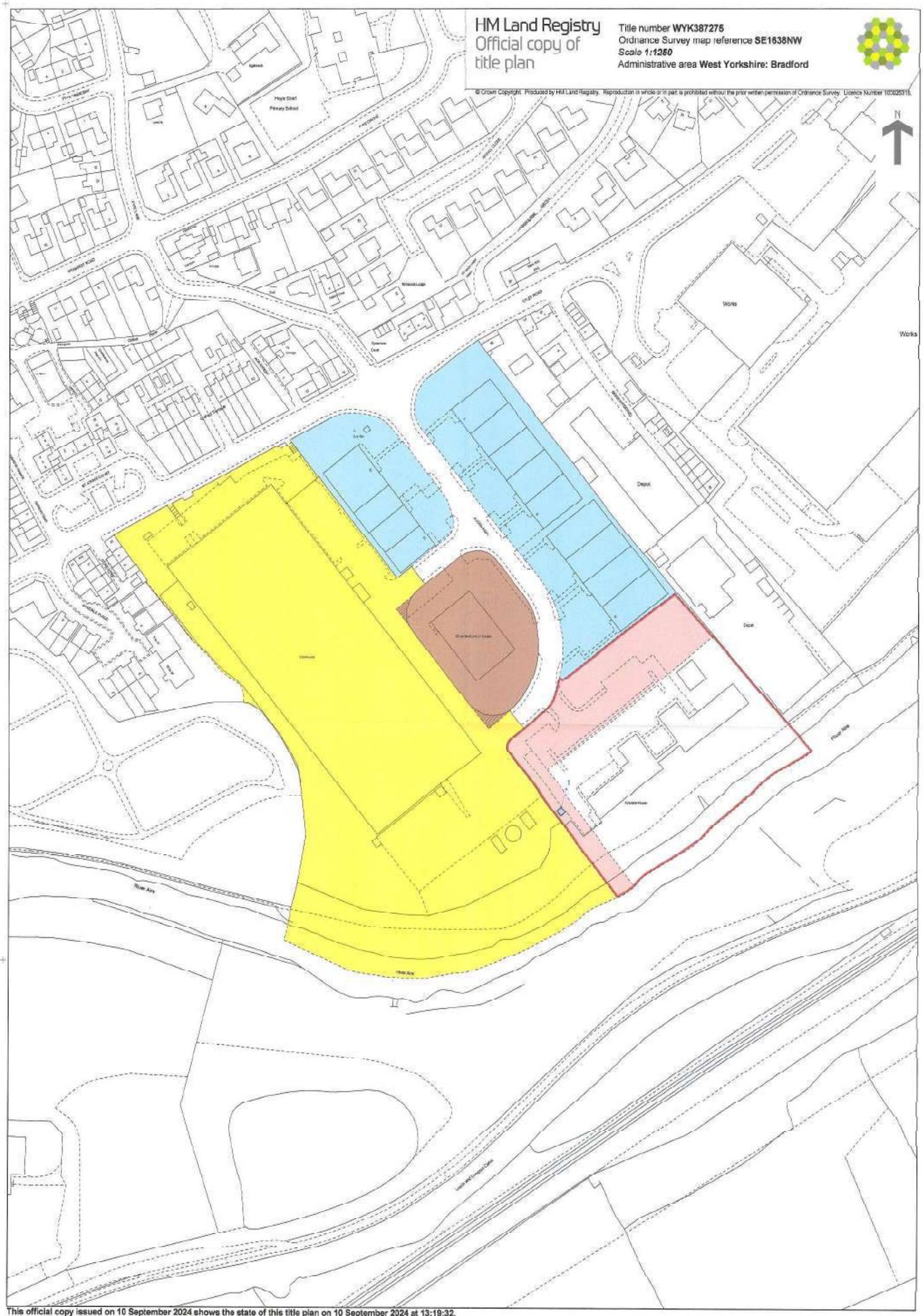
You did not apply for an official copy of the register.

Please contact the HM Land Registry Office named if you have any questions about the enclosed official copy/copies.

TEL14.23

KEYSTONE LAW LTD
DX 193
Chancery Lane

1
0352005002



This official copy issued on 10 September 2024 shows the state of this title plan on 10 September 2024 at 13:19:32.
It is admissible in evidence to the same extent as the original (s.67 Land Registration Act 2002).
This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground.
This title is dealt with by HM Land Registry, Durham Office.

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Plotted Scale - 1:1250. Paper Size – A4

Title Number: WYK387275

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Plotted Scale - 1:1250. Paper Size – A4

Title Number: WYK387275

Highways Extent Plan

Search Details

Prepared for: Keystone Law
Matter: TEL14.40
Client address: 48 Chancery Lane, London, WC2A 1JF

Property:
Teledyne Microwave Uk, Airedale House, Acorn Park Industrial Estate, Charlestown, Shipley, BD17 7SW

Local Authority:
Bradford Metropolitan District Council
City Hall, City Hall, Centenary Square, Bradford, BD1 1HY

Date Returned:	Property type:
27/11/2024	Commercial

This search was compiled by the Local Authority above and provided by InfoTrack Ltd - t: 0207 186 8090, e: helpdesk@infotrack.co.uk. This search is subject to terms and conditions issued by InfoTrack which can be viewed at www.infotrack.co.uk or supplied on request. This search is also subject to terms and conditions issued by the Local Authority, available on request. InfoTrack are registered with the Property Codes Compliance Board (PCCB) as subscribers to the Search Code. The PCCB independently monitors how registered firms maintain compliance with the Code. Visit www.propertycodes.org.uk for more information.

City of BRADFORD METROPOLITAN DISTRICT COUNCIL

Department of Place

Transportation & Highways
Highway Development Control
4th Floor, Britannia House, Hall Ings,
Bradford, West Yorkshire BD1 1HX

Tel No: 01274 433707
Contact: Paul Brooksbank
Email: Paul.Brooksbank@bradford.gov.uk
My Ref: TDP/47307/DC/STATUS/PB
Your Ref: 70504140:TEL14.40

Date: 27 November 2024

Infotrack Limited
Level 11
91 Waterloo Road
London
SE1 8RT

Dear Sirs

RE: Teledyne Microwave Uk Airedale House Acorn Park Industrial Estate, Charlestown Shipley BD17 7SW

Thank you for your email dated 26th November 2024.

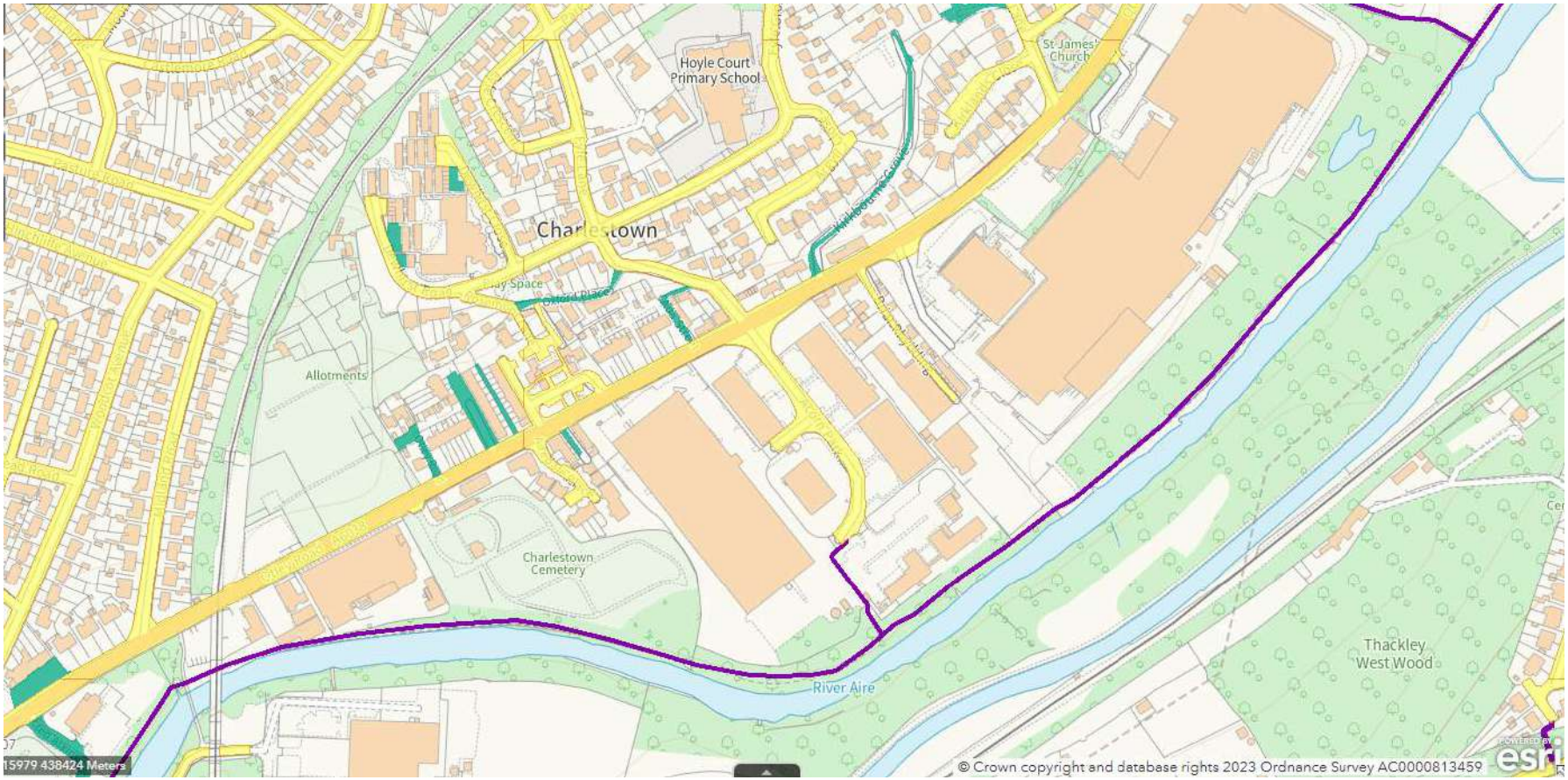
I can confirm that Acorn Park is an adopted highway maintained by the Council at public expense.

I have enclosed a plan highlighting the adopted highway in yellow.

If you have any further queries, please contact me.

Yours faithfully

Paul Brooksbank
Highway Registry Assistant



City of BRADFORD METROPOLITAN DISTRICT COUNCIL	**ACORN PARK**	**YELLOW – ADOPTED**	**TURQUOISE - UNADOPTED**
	PURPLE – PUBLIC FOOTPATH ONLY		
	NOT TO SCALE - FOR IDENTIFICATION PURPOSES ONLY	Plan No. 66700/Gen	
	Department of Regeneration, Highways Development Control, 4th Floor, Britannia House, Bradford BD1 1HX		

CAUTION
STOP
STOP

HOWDENS
POLICE
CAUTION
TELEDYNE

Jury discharged in Pro-Palestine protest trial

Julian Gao, Ruby Hamill, Daniel Jones and Sayed Shah are all on trial at Bradford Crown Court

13 September 2024

The jury in the trial of four pro-Palestine protesters accused of causing nearly £600,000 of damage to a factory has been discharged.

Julian Gao, Ruby Hamill, Daniel Jones and Sayed Shah were arrested after staging a protest at the Teledyne factory in Shipley, which specialises in supplying electronics to the aerospace and defence sectors.

Following the incident all four were charged with causing criminal damage and having articles with intent to destroy or damage property.

However, after a trial at Bradford Crown Court the jury failed to reach verdicts on any of the charges. All four defendants will face a re-trial at the same court in February 2026.

At the start of the trial the jury was shown CCTV footage of the group using an angle-grinder to cut through a security fence in the early hours of 2 April.

The group was filmed carrying items including sledgehammers, crowbars, ladders and flags and staging a protest on the roof of the premises.

The three men and a woman, who were wearing red boiler suits, were then captured on drone footage smashing roof tiles and windows.

When police officers arrived they challenged the group on the roof and were told they were protesting at the site due to **the war in Gaza**, the court heard.

GETTY IMAGES

The protest on 2 April at Teledyne in Shipley lasted 14 hours, prosecutors told the jury

Prosecutor Gerald Hendron told the court the total damage caused externally and internally to the premises had been £571,383.

Teledyne Space and Defence Ltd supplies the defence and aerospace industry.

Mr Hendron said components were used in the manufacture of weapons used by the British Army and NATO, as well as weapons purchased by other countries such as Ukraine and Israel.

On Friday, after about seven hours of deliberation over two days, Judge Sophie McKone asked the jury if they would be able to reach verdicts if they were given more time.

When the forewoman indicated they would not, the judge thanked them for their attention during the trial and formally discharged them.

Mr Gao, 20, of Dalton Ellis Hall, Manchester, Mr Shah, 51, of Reedley Road, Burnley, Mr Jones, 30, of Rossett Road, Crosby, and 20-year-old Ms Hamill, of Emu Road, London, have all been bailed ahead of their next appearance.

Listen to highlights from **West Yorkshire on BBC Sounds**, *catch up with the latest* ***episode of Look North*** *or tell us a story you think* ***we should be covering here***.

Related topics

Israel-Gaza war **Shipley**

More on this story

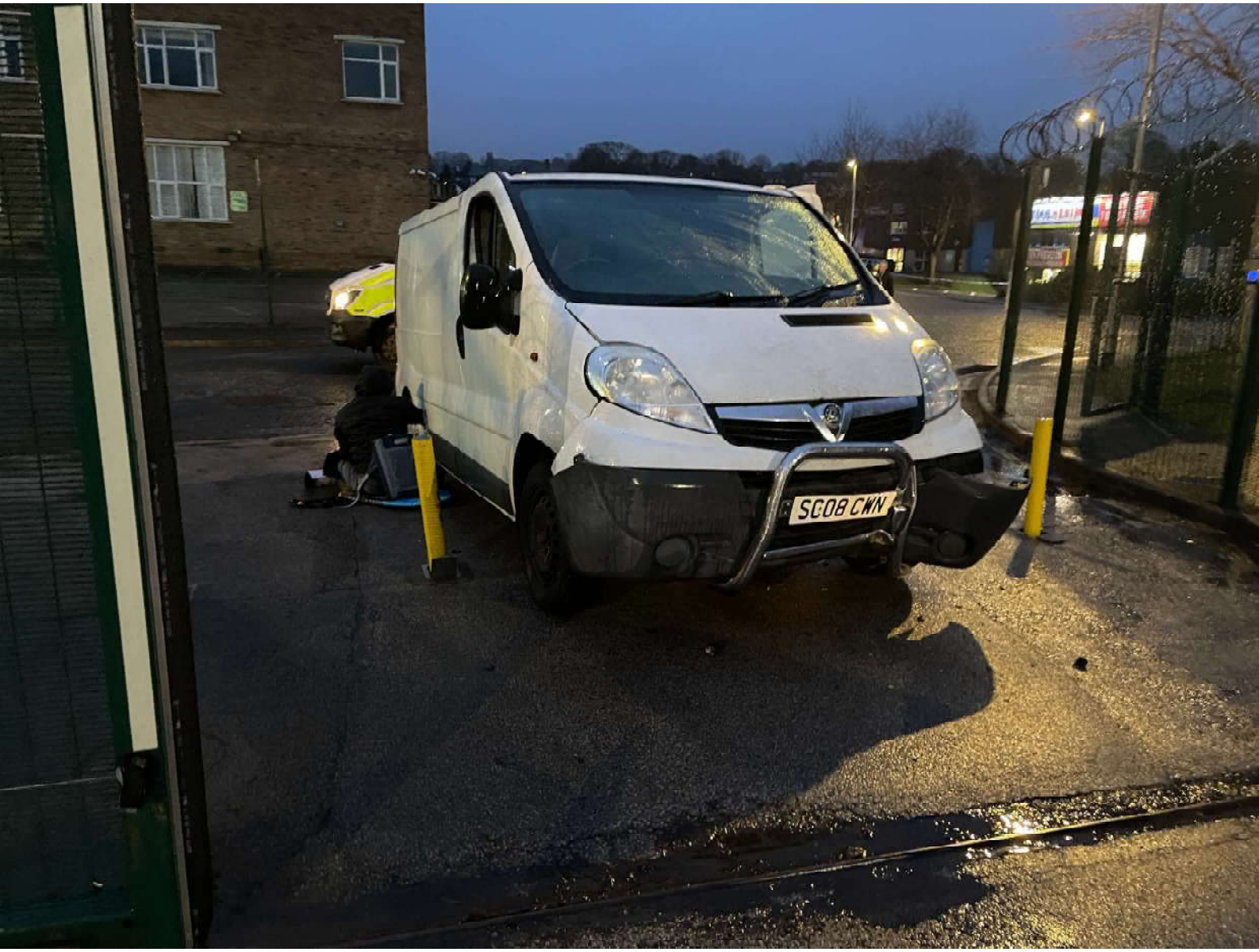
Rooftop protesters caused £571k damage, court told

3 September 2024

From other local news sites

Keighley-district sites & buildings feature in new Local Heritage Hub

TELEDYNE
STOP KILLING
PALESTINE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STOP SUPPORTING
STOP ARMS TO
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STOP SUPPORTING
the land grab
the Zionists'
Holocaust
GAZA
ILLEGAL
OCCUPATION
ARMS TO

SC08 CWN

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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

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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).

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(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)

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

Defendants

FOURTH WITNESS STATEMENT OF NICHOLAS JAMES WARGENT

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

1. I am a director of the Claimant, Teledyne UK Limited (**'Teledyne UK'**). Teledyne UK is a wholly owned subsidiary of Teledyne Technologies Incorporated, a New York Stock Exchange listed company (together the **'Teledyne Technologies Group'**). The Teledyne Technologies Group's operations are primarily located in the United States, the United Kingdom, Canada, and Western and Northern Europe.

2. I am also an in-house solicitor and General Counsel for the Europe, Middle East and Africa, and Asia-Pacific regions for the Teledyne Technologies Group, and I am duly authorised to make this witness statement on behalf of Teledyne UK.

3. I make this witness statement pursuant to paragraph 9 of the Order of Tipples J dated 24 January 2025, and paragraph 9 of the Order of Murray J dated 21 March 2025, both of which require Teledyne UK to file and serve any further evidence upon which it will rely at the final hearing of the Claim against the Named Defendants and at the review of the Order against Persons Unknown by 29 May 2025.

4. The facts and matters set out in this statement are within my own knowledge unless otherwise stated, and I believe them to be true. Where I refer to information supplied by

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others, the source of the information is identified; facts and matters derived from other sources are true to the best of my knowledge and belief. This witness statement has been made following conference and exchanges of emails with Teledyne UK's legal advisers.

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

Scope of this statement

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

    i. my first witness statement dated 13 December 2024 (my **'first witness statement'**);

    ii. my second witness statement dated 19 December 2024 (my **'second witness statement'**); and

    iii. my third witness statement dated 15 January 2025 (my **'third witness statement'**).

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

    i. service of the Tipples J and Murray J Orders;

    ii. further incidents of protest since January 2024;

    iii. further evidence relating to the 2024 incidents at the Wirral Site;

    iv. apprehension of further acts of protest;

    v. additional information.

Docusign Envelope ID: 1CA0DAEA-E9D9-4B5D-8021-B02FE4DA83F1

8. To assist the Named Defendants, specific evidence in relation to each can be found in the following paragraphs:

    i. D2 Ruby Hamill: 64(i);
    ii. D5 Ricky Southall: 62, 64(ii), 82 and 83;
    iii. D6 Amareen Afzal: 80 to 83;
    iv. D7 Serena Fenton: 64(iii) and 82 to 83;
    v. D14 Autumn Taylor-Ward: 46 to 53, and 62;
    vi. D16 Lara Downes: 54 to 59;
    vii. D17 Gabriella Middleton: 54 to 59;
    viii. D19 Mary Ensell: 19 to 22; and
    ix. D20 Harry Wade: 19 to 22.

SERVICE OF THE TIPPLES J AND MURRAY J ORDERS

9. The Order of Tipples J dated 24 January 2025 lists, and gives directions to, the final hearing of the Claim against the Named Defendants (save for D19 Mary Ensell and D20 Harry Wade) and the review of the Order against Persons Unknown. The Order of Murray J dated repeats those directions and listing for D19 Mary Ensell and D20 Harry Wade.

10. As such, those two Orders are, in effect, the notice of hearing, and I shall confirm service of those Orders below.

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

    i. On 27 January 2025, the Order of Tipples J was uploaded to the injunction website in accordance with paragraph 3(i) of the Order. I gave the instruction for the upload, and viewed the page once the Order had been uploaded. As I explained in my affidavit in support of the ongoing contempt application, the website went offline unexpectedly for a brief period between approximately 10pm on 27 January 2025 (after the Order had been uploaded) and 12.15pm on 28 January 2025, because of a

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

ii. Keystone Law inform me that on 27 January 2025, the Order of Tipples J was sent to the eleven email addresses in accordance with, and as set out in, paragraph 3(ii) of the Order;

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

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

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

i. On 25 March 2025, the Order of Murray J was uploaded to the injunction website in accordance with paragraph 3(i) of the Order. I gave the instruction for the upload, and viewed the page once the Order had been uploaded;

ii. Keystone Law inform me that on 24 March 2025, the Order of Murray J was sent to the eleven email addresses in accordance with, and as set out in, paragraph 3(ii) of the Order;

iii. Keystone Law inform me that on 24 March 2025, the Order of Murray J was sent by first class post to the Nineteenth and Twentieth Defendants, in accordance with paragraph 3(iii) of the Order.

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

    i. I explained at paragraph 35 of my third witness statement that the required signs were erected at the Wirral, Shipley, Lincoln and Presteigne Sites on 20 December 2024 to effect service of the Order of Bourne J dated 20 December 2024. Large signs were erected at the entrances to the Chelmsford Site on 20 December 2024, with further perimeter signage being added on 23 December 2024. The required signs were erected at the Newbury Site on 23 December 2024. I exhibited to my witness statement plans showing the locations of the signs at each site (exhibit NJW3/32-38), and certificates of service were included within the hearing bundle (and shall be included in the trial hearing bundle also). Those signs remain in situ, and therefore the requirement at paragraph 3(iv) of the Tipples J and Murray J Orders are met; and

    ii. further signs have also since been erected at the Chelmsford, Lincoln and Shipley Sites to ensure a better coverage of the perimeter of those sites. I exhibit at **NJW4/1-3** plans of the three sites that show the current location of the injunction signs. The plan of the Chelmsford Site is correct as of 31 January 2025. The plan of the Lincoln Site is correct as of 21 January 2025. The plan of the Shipley Site is correct as of 17 February 2025.

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

FURTHER INCIDENTS OF PROTEST

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

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17. There have, however, been two further incidents of protest at the Shipley Site, of which Teledyne UK does complain, and upon which it relies when seeking final injunctive relief against **D19 Mary Ensell** and **D20 Harry Wade**, and also a continuation of the injunction against Persons Unknown. I shall out the details of these two incidents below.

18. As with my previous witness statements, I exhibit at **NJW4/4-8** a spreadsheet maintained by a colleague at Teledyne UK that records the incidents of protest at Teledyne UK's sites. That spreadsheet is updated to include further incidents to the date of this witness statement.

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

19. Shortly before 5am on 28 January 2025, two vehicles attended the Shipley Site. One vehicle, a Vauxhall Vivaro van, was driven at speed into the bollards protecting the gate to the Shipley Site, where it was then abandoned (it becoming wedged on a bollard). The driver of the van remains unidentified; they left the scene in the second support vehicle.

20. **D19 Mary Ensell** and **D20 Harry Wade** arrived at the Shipley Site in the second support vehicle. After observing the van crash, they proceeded to lock onto the van, which had been reinforced with concrete to facilitate the lock-on. Specialist police officers used heavy duty tools to attempt to release Ms Ensell and Mr Wade from the lock-on, but they eventually released themselves at approximately 12:30pm.

21. Following this incident, Ms Ensell and Mr Wade were added as Named Defendants to these proceedings, and the injunction extended to cover them (see the Order of Murray J dated 21 March 2025). Contempt Applications have also been brought against both Defendants and, at the date of this witness statement, are still yet to be determined (but have now been listed for disposal on 28 and 29 July 2025). Ms Ensell and Mr Wade undertook this action under the banner of Palestine Action.

22. Scott Patterson, the Site Director of the Shipley Site, will give further details on this incident in his witness statement in support of the Claim.

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18 February 2025: Shipley Site, Persons Unknown

23. Shortly before 1.45am on 18 February 2025, three unidentified persons attended the Shipley Site, positioned a small ladder against the fence, and threw multiple bottles (or similar) over the fence and towards a building on the Shipley Site. The bottles were full of paint, and smashed on impact, causing the paint to splash on and around the building.

24. Mr Patterson will give further details on this incident in his witness statement in support of the Claim.

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

25. I am informed by Teledyne UK's solicitors (Keystone Law) that, on the early morning of 10 March 2025, four unidentified protestors attended their London Offices (Chancery Lane), and smashed a window, and graffitied the building (including an inside reception area) and pavement with red paint, including the words 'DROP TELEDYNE'.

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

27. Manan Singh, Partner at Keystone Law, will give further details on this incident in a further witness statement in support of this Claim.

30 March 2025: Grenoble, Persons Unknown

28. Whilst not strictly relevant to the Claim, I should also draw the Court's attention to an incident that occurred at a site operated in Grenoble by another wholly-owned subsidiary of the Teledyne Technologies Group. This site is operated by Teledyne e2v Semiconductors SAS. The incident appears to have been carried out by supporters of a pro-Palestinian protest group, Europe Palestine Network, which is similar to Palestine Action, who have taken credit for the incident on social media.

29. In that incident, I am informed by my colleagues that approximately 30-50 protestors entered the site (although the relevant protest group claimed that about 100 protestors were

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

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

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

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

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

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

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

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

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

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Summary

36. Incidents of protest do continue to occur at and proximate to Teledyne UK's sites. However, since the grant of the first without notice injunction in December 2024, there have only been two incidents of alleged unlawful protest at the Shipley Site, and no incidents of alleged unlawful protest at the five other sites protected by the injunctive relief. That shows a deceleration in the occurrence of alleged unlawful incidents, which had been accelerating in 2024, and especially in the last quarter of that year.

37. To that end, in my first witness statement I described specific incidents that Teledyne UK complained of and relied upon when seeking injunctive relief. One occurred in 2022, two occurred in 2023, and seven occurred in 2024 (or eight, after 19 December 2024 was included), five of which occurred from October 2024 onwards. The aforementioned spreadsheet also shows that incidents of protest at or proximate to Teledyne UK's sites have also been generally increasing, although Teledyne UK does not complain of many of those incidents, as they were lawful and peaceful protests.

38. Further, since the grant of injunctive relief, there have been no further instances of protestors standing in front of the gates to the Shipley Site and obstructing access, which was starting to become a feature of the protests at the Shipley Site, and which led to Teledyne UK seeking the additional protections in relation to that site. As the aforementioned spreadsheet shows, there have been several protests held outside and proximate to the Shipley Site, including by the Bradford Friends of Palestine group, whose supporters had taken to acts of obstruction prior to the grant of injunctive relief, but none of the recent protests have included any acts of obstruction in breach of the injunction.

39. Overall, my view is that the injunctive relief has been very effective, and has allowed the right balance to be struck, especially at the Shipley Site; protestors are still able to (and do) protest peacefully outside and proximate to the sites, but Teledyne UK's rights are also upheld and it is able to conduct its business without interference with access to or intrusion upon its sites. I attribute the improvement in the situation to the injunction; I note specifically that, in relation to the incident of 12 April 2025 outside the Shipley Site, the aforementioned spreadsheet records the observation that the organisers of the protest appeared to be referring to the injunction and warning those in attendance not to breach the

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

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

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

2024 INCIDENTS AT THE WIRRAL SITE

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

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

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

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

5 July 2024: D14 Autumn Taylor-Ward

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

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

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

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

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50. I also exhibit at **NJW4/14-16** the MG11 witness statement of PC Belfield, which gives further context to Ms Taylor-Ward's arrest, and in which PC Belfield records his observation of Ms Taylor-Ward passing a re-purposed fire extinguisher out of the van window to the protestor on top of the van, which they then used to spray paint around the surrounding area.

51. Finally, I also exhibit at **NJW4/17-19** the MG11 witness statement of PS Hicks, which again gives further context to Ms Taylor-Ward's arrest, and the incident as a whole. In that statement, PS Hicks records that the van was searched after Ms Taylor-Ward's arrest, and prior to the detention of the protestor on top of the van. Recovered in that search were a Dewalt angle grinder, crowbar, hammer and a further re-purposed fire extinguisher. I exhibit at **NJW4/20-24** exhibits DJH02-DJH06, which accompany PS Hicks' MG11 (exhibit DJH01 is body worn camera footage, which was not disclosed). Those photos show the van, the paint damage to the site and a Teledyne UK employee's car, as well as the items seized.

52. It appears to me from the Merseyside Police disclosure that Ms Taylor-Ward was arrested at the site on suspicion of criminal damage and aggravated trespass, and that pre-charge conditional bail was granted.

53. When preparing this updating witness statement, I requested an update from Merseyside Police on the progress of the criminal proceedings. On 16 May 2025, I was informed that the Crown Prosecution Service have authorised two charges against Ms Taylor-Ward: criminal damage over £5000 and conspiracy to cause a public nuisance. It is not clear to me what the timeline for the listing of any trial is, or what the bail status of Ms Taylor-Ward is at this time.

2 October 2024: D16 Lara Downes and D17 Gabrielle Middleton

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

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

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

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

    i. **NJW4/25** – D16 Lara Downes;

    ii. **NJW4/26** – Gabrielle Middleton.

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

    i. Image 1 is a wide shot image of the roof of the building. One protestor can be seen in red overalls in the middle right of the roof, and two others in the middle/middle left. One protestor appears to be laying on their front, but it is hard to distinguish much else from this image;

    ii. Image 2 shows some damage to/a hole in the roof (middle right of the image). This damage was caused by the protestors. In the top left of the image, a protestor can be seen laying on their front looking into a hole in the roof, which the protestors have again made;

    iii. Image 3 shows Ms Downes and Ms Middleton on the roof. Ms Middleton is wearing a dark coloured coat over red overalls, and is crouching next to a large hole in the roof that has been made by the protestors, and is squirting a green substance (which I believe to be paint) through the hole. Ms Downes is also crouching/lying next to

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

iv. Image 4 is a wider shot of the roof. Ms Middleton is standing on the roof, and Ms Downes is again lying next to and reaching into a large hole in the roof that has been made by the protestors. Towards the top right of the image, a second hole in the roof can be seen, with red paint splashed around the opening;

v. Image 5 shows Ms Middleton on the roof, conferring with the third protestor. Three cans, which appear to be spray paint or similar, are on the roof next to them. The red overalls of the third protestor bear the words "Palestine Action". A pickaxe rests between Ms Middleton and her accomplice, with damage to a nearby flue on the roof visible;

vi. Image 6 is a close-up image of Ms Downes sitting on the roof, with her legs dangling through the hole that the protestors have made. Around her is broken and discarded roof, three jars (jam jars or similar) and an angle grinder in the foreground. Ms Downes appears to be lowering something through the hole and into the building by a blue rope. Subsequent images will show that it is likely to be a yellow-coloured angle grinder that is attached to the end of the rope;

vii. Image 7 again shows Ms Downes reaching into the hole in the roof, with the blue rope, she is now lying on her front when doing so. Her red overalls bear the words "Palestine Action". The third accomplice is in the foreground, using the pickaxe to damage the roof;

viii. Image 8 is a close-up image of Ms Downes lying on her front reaching into the hole (whilst her face is not visible, she can be identified from her shoes). Next to Ms Downes, and attached to a blue rope, is a yellow-coloured angle grinder (which has some green markings on it – probably paint);

ix. Image 9 is captured from directly overhead Ms Downes and Ms Middleton. Ms Middleton appears to have two crowbars with her. Ms Downes is reaching into the aforementioned hole (it appears with the angle grinder on the rope – which can be

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

x. Image 10 is a close-up version of image 9, save that Ms Downes appears to be kneeling. The discarded green paint bottle can be seen in the top left of the image;

xi. Image 11 shows a similar scene to images 9 and 10, but from a wider angler. The third protestor can be seen wielding a pickaxe to the right of the image;

xii. Image 12 again shows a similar scene with Ms Middleton sitting next to the hole. In this image, it is clear that Ms Downes has the yellow-coloured angle grinder attached to the rope, and that she is dangling it into the building;

xiii. Image 13 shows the three protestors on the roof together, next to the large hole that they have made and with their various paraphernalia scattered around. Ms Downes' face is clearly visible, allowing her to be identified. The third protestor is wielding a pickaxe and damaging a flue;

xiv. Image 14 again shows the three protestors standing on the roof, the yellow angle grinder on the blue rope is visible;

xv. Image 15 is a close up shot of Ms Middleton and Ms Downes standing on the roof, again allowing for their identification. Just behind Ms Middleton, a crowbar also appears to be attached to some blue rope;

xvi. Image 16 is a close-up image of a smaller hole that has been made by the protestors in the roof. Ms Downes is inside the hole, looking upwards to Ms Middleton, who is crouching on the surface of the roof. Amongst the discarded roof remains, I note an item in the bottom left of the image which says "PALESTINE" on it. It appears to me that the item is a fire extinguisher, and I know that Palestine Action encourage the use of re-purposed fire extinguishers in their direction action (this is encouraged in the Underground Manual, for example); finally

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

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

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

APPREHENSION OF FURTHER ACTS OF PROTEST

Named Defendants

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

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

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

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

Named Defendants: propensity to commit unlawful direct-action protest

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

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

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

ii. **D5 Ricky Southall** – Sky News published an article dated 7 April 2025, which details an incident at the Trump Turnberry gold course in South Ayrshire, Scotland. The article explains that the clubhouse was defaced with red paint, and the greens also damaged, at around 4.40am on 8 March 2025. A Mr Ricky Southall is named as one of those arrested in relation to the incident. Given the stated location of Mr Southall's arrest, and the known address of Mr Southall, I believe that this is likely to be D5 Mr Southall. I exhibit a copy or the article at **NJW4/55-58**, which can also be viewed here: https://news.sky.com/story/man-and-woman-in-court-over-damage-to-trump-turnberry-golf-resort-in-scotland-13343856. Notably, on 8 March 2025, Palestine Action also published a news article on its website, taking credit for the attack. I exhibit that article at **NJW4/59-60** (https://palestineaction.org/trump-golf/);

iii. **D7 Serena Fenton** – BBC News published an article on 29 January 2025 in which it is said that a Ms Fenton (of an address that matches the address of D7 Ms Fenton) has been charged with racially intentional harassment and using threatening or insulting words to cause harassment, in relation to her alleged displaying of antisemitic posters. Whilst this is not direct-action of the kind complained of in this Claim, it does show a tendency for extreme actions. I exhibit a copy of the article at **NJW4/61** (https://www.bbc.co.uk/news/articles/czx848ywr8ro).

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

Palestine Action

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

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

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

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

    i. at **NJW4/62** I exhibit a copy of the homepage, as it displays on 2 May 2025 (https://palestineaction.org). Midway down the page, there are links to pages titled 'Direct Action Trainings', 'Online Crash Course' and 'Fund the Movement'. At the bottom of the page, there are six links to specific direct action training days that are taking place throughout the UK in the coming months;

    ii. at **NJW4/63** I exhibit a copy of the 'Join the Resistance' page, as it displays on 2 May 2025 (https://palestineaction.org/join/). That page provides various links to the various pages on direct action training days, online crash courses and workshops, with a 'Join Palestine Action' form appearing at the bottom of the page, in which it asks potential new joiners if they are interested in undertaking direct action;

    iii. at **NJW4/64** I exhibit a copy of the 'Direct Action Training Days' page, as it displays on 2 May 2025 (https://palestineaction.org/trainingday/). At the bottom of the page there are links to sign up to training days being hosted across the country throughout May and June 2025.

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

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

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

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

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

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

i. **NJW4/66-67** – is an article published on 14 May 2025, in which the group details that the offices of both Edwards Accountants in Birmingham and JP Morgan at Victoria Embankment in London were targeted in the early hours of that morning because of their association with Elbit Systems UK. The article described that both buildings were covered in red paint, and that the front glass doors of JP Morgan were shattered;

ii. **NJW4/68-69** – is an article published on 18 April 2025, in which the group details how five branches of the insurer Allianz were targeted overnight because of its association with Elbit Systems UK. The article described that the premises had their windows smashed, and were coated in red paint and daubed with the message 'Drop Elbit';

iii. **NJW4/70-71** – is an article published on 16 April 2025, in which the group details that two activists occupied the roof of 'GRiD Defence Systems', which is a supplier

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

iv. **NJW4/72-73** – is an article published on 14 April 2025, in which the group details co-ordinated actions at an Elbit site in Leicester, and a branch of Allianz in Bristol (a lock-on and occupation respectively), and claims responsibility for an overnight action at an Aviva site, in which damage was caused;

v. **NJW4/74-76** – is an article published on 7 April 2025, in which the group details action at five offices of Scottish Enterprise, because of its association with Leonardo UK and Thales UK;

vi. **NJW4/77-78** – is an article published on 31 March 2025, in which the group details that activists were occupying the roof of the Dean Group facility in Manchester, having smashed windows and solar panels, and covered the building in red paint. The article reminds readers that the same site was targeted in July 2024;

vii. **NJW4/79-80** – is an article published on 21 March 2025, in which the group details actions at Keysight Technologies and Allianz (Glasgow), which included what appears to be significant property damage. The article references action that had also been taken at a Leonardo site the previous day;

viii. **NJW4/81-82** – is an article published on 15 March 2025, in which the group details how, that morning, supporters of the group attended Elbit System's Bristol headquarters for the 17th time. The article describes that the protestors used a cherry picker vehicle, with one activist locked-on inside the vehicle, and others in the bucket lift damaging the roof of the premises (including by the use of paint, and swinging a sledgehammer on a rope to smash the windows of the premises).

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

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

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

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

Ceasefire

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

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

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

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

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

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

ADDITIONAL INFORMATION

D6: Amareen Afzal

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

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

> *My name is Amareen, I am an activist with Palestine Action, based in Leeds, and I'm raising funds to cover legal costs for taking direct action against Teledyne Defence and Space, a US-owned company manufacturing arms which have been deployed by Israel against Gaza.*
>
> *On Nakba Day this year, myself and three other activists occupied the Teledyne factory, dismantled the roof, and shut down their operations to disrupt their role in the ongoing genocide in Gaza, and the continued ethnic cleansing of Palestine. As a result, we are now facing trial in September next year.*

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

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

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

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

The fourth Shipley Site protestor on 15 May 2024

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

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

CONCLUSION

85. Teledyne UK continues to apprehend imminent acts of unlawful direct-action protest at its six sites currently protected by the Orders of Tipples J dated 24 January 2025 and Murray J dated 21 March 2025.

86. As to Persons Unknown, it is clear that the primary group with which Teledyne UK is concerned, that being Palestine Action, continues to be active and engaged in such unlawful acts, whilst also continuing to train and recruit new members. As to the Named Defendants who remain live in these proceedings, they have elected not to settle the proceedings by way of undertaking and promise to the Court that they will not again engage in acts of unlawful direct-action at the six Teledyne UK sites.

87. In the circumstances, Teledyne UK respectfully asks that final injunctive relief is granted against the remaining Named Defendants, and a five-year order subject to annual review is made against Persons Unknown. The relief sought goes no further than is necessary to protect Teledyne UK's rights as landowner, whilst balancing the important rights of the Named Defendants and Persons Unknown to protest peacefully at and proximate to the six Teledyne UK sites.

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Statement of Truth

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

DocuSigned by:
NICK WARGENT
753F3005560B4D5...

Nicholas James Wargent
Dated this 23 day of May 2025

IN THE HIGH COURT OF JUSTICE **Claim No. KB-2024-004175**
KING'S BENCH DIVISION

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)

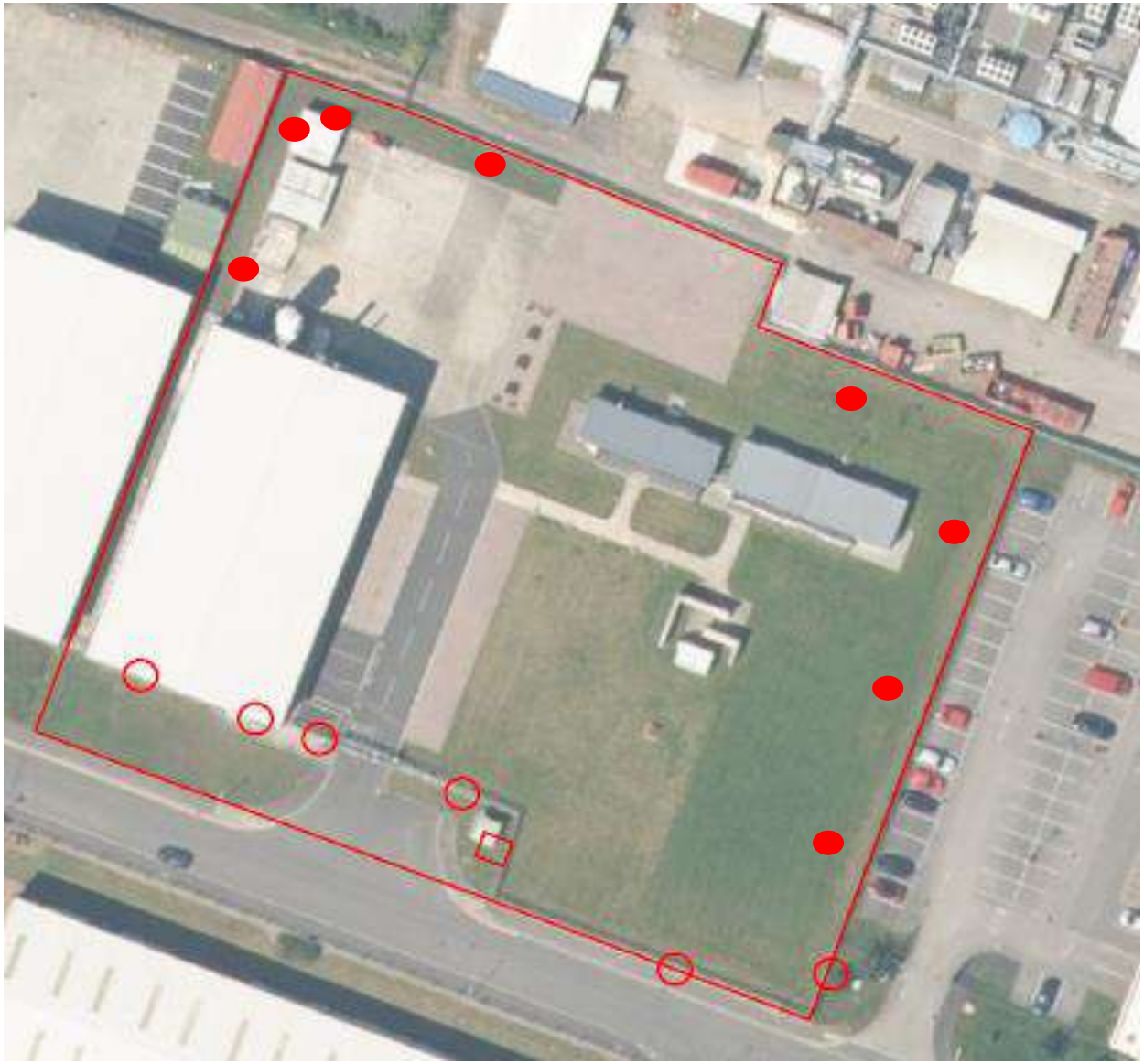
(11) PERSONS UNKNOWN WHO FOR THE PURPOSE OF PROTESTING ARE CAUSING THE BLOCKING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT SCHEDULE 3 TO THE CLAIM FORM

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

Defendants

EXHIBIT NJW-4

This is Exhibit NJW-4 referred to in the Fourth Witness Statement of Nicholas James Wargent.



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Plotted Scale - 1:4000. Paper Size – A4

Teledyne UK - attacks and demonstrations 2022 - 2024								
Date	**Location**	**Duration**	**Group**	**Approx numbers**	**Police attendance**	**Tactics seen**	**Remarks**	**Subsequent Action**
9-Dec-22	**Labtech Presteigne**	**5-6 hours**	**Palestine Action**	**4**	**Yes. Large police response.**	**Accessed reception. Sledgehammers used to break glass and destroy IT equipment. Ladders used to scale roof. Damage to roof and production area.**	**Police at heights team and Fire Service removed and arrested protesters from roof.**	**4 protestors held in prison on remand pending trial. Trial held 9-12 May 2023. [redacted] changed plea to guilty. Sentenced to 23 months imprisonment. [redacted] found guilty. Sentenced to 27 months imprisonment.**
28-Sep-23	**Te2v Chelmsford**	**Minutes**	**Palestine Action**	**1**	**No.**	**Red paint splashed across front wall.**	**Photographer present.**	**Police did not respond - led to subsequent calls with an Essex Detective Chief Inspector. Photo of TDY employee on national press website: taken down on request.**
23-Nov-23	TDS Shipley	1-2hrs	Bradford Friends of Palestine	10	Yes immediate 4 Officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
7-Dec-23	TDS Shipley	1-2hrs	Bradford Friends of Palestine	30	Yes immediate +6 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
19-Dec-23	TDS Shipley	1-2hrs	Bradford Friends of Palestine	120	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
26-Dec-23	**TDS Shipley**	**Minutes**	**Unknown**	**2**	**Yes immediate approx 10 officers**		**Arson attack. No injuries. Minor damage to goods inward area.**	**Suspect arrested September 2024. Thought to be a local, not part of a group. The CPS decided not to charge: evidence not strong enough.**
4-Jan-24	TDS Shipley	1-2hrs	Bradford Friends of Palestine	120	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
18-Jan-24	TDS Shipley	1-2 hrs	Bradford Friends of Palestine	45	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
25-Jan-24	TDS Shipley	1-2hrs	Bradford Friends of Palestine	40	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
8-Feb-24	TDS Shipley	1-2hrs	Bradford Friends of Palestine	15	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
14-Feb-24	TDS Shipley	1-2hrs	Bradford Friends of Palestine	60	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
16-Feb-24	CML Bromborough	1-2 hrs	Palestine Action Liverpool	10	Yes - 1 vehicle 2 Officers	Blocking entrances but allowing employee access trying to hand out leaflets	Not believed to be linked to Palestine Action Group. peaceful banners and posters and handing out leaflets	
29-Feb-24	TDS Shipley	1-2hrs	Bradford Friends of Palestine	20	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	

Teledyne UK - attacks and demonstrations 2022 - 2024

Date	Location	Duration	Group	Approx numbers	Police attendance	Tactics seen	Remarks	Subsequent Action
6-Mar-24	CML Bromborough	1-2hrs	Palestine Action Liverpool	20	Yes immediate 1 vehicle 6 Officers	Blocking entrances trying to hand out leaflets. Possible that as all police/security resource arrives they disperse, thus costing Police and site extra cost.	Peaceful, blocking entrance gates, displaying banners handing out leaflets	
6-Mar-24	Labtech Presteigne	1-2 hrs	Radnor Palestine Links	25	No.	Blocking vehicle gate and handing in a letter	Peaceful. Handing over a letter demanding to speak to management. Subsequent piece in press. Two individuals with known links to PAG and previous protests/damage etc	
15-Mar-24	CML Bromborough	1-2hrs	Palestine Action Liverpool	20	Yes immediate approx 8 officers	Blocking entrances, handing out leaflets	Peaceful, blocking entrance gates, displaying banners handing out leaflets	
18-Mar-24	CML Bromborough	1.5 hrs	Palestine Action Liverpool	20	1 police officer	Blocking entrances but allowing employee entry	As previous. Banners leaflets standing at entrance points	
20-Mar-24	TDS Shipley		Bradford Friends of Palestine	60	5 Police, 2 vehicles in attendance prior to protest	Stood in front of vehicle gates but allowed access	Peaceful displaying banners (pro Palestine/anti Teledyne) 1 protester taking a lot of footage of the site buildings and perimeter. Assessed to be hostile recon. Speaker units and microphone in use (unknown what was said) 2 protesters praying at gate during protests (not seen before). Unite union flags in attendance.	
23-Mar-24	CML Bromborough	45mins	Palestine Action Liverpool	60	1 police vehicle 2 officers	Blocking entrances but allowing employee entry	As previous. Banners leaflets standing at entrance points. No employees required access/exit	
27-Mar-24	Labtech Presteigne	2hrs	Radnor Palestine Links	18	No police	Stood in front of vehicle gates, handed letter to site	Banners, leaflets etc	
2-Apr-24	**TDS Shipley**	**Approx 16hrs**	**Palestine Action Liverpool**	**4 on roof + 20 outside**	**All emergency services in numbers**	**On roof, smashing roof tiles, brickwork, windows etc**	**Eventually arrested and removed. Significant damage to building. Costs estimated at c£700k**	**Daniel Jones & Najam Shah released from custody after 1 week. Ruby Hamill released from custody 2 May. Julian (aka Laila) Gao remained in custody until June. Trial 5-13 Sept 2024. Hung jury. Retrial set for 9 February 2026.**
4-Apr-24	Labtech Presteigne	10 mins	Local councillor and ex mayor	1	No police	Handed letter to site	Nothing further	
9-Apr-24	TDS Shipley	2hrs	Bradford friends of Palestine	20-25	6 Officers	Blocking entrances but allowing ingress egress	Banners, leaflets and speakers	
10-Apr-24	CML Bromborough	1hr	Palestine Action Liverpool	approx 8	No police	Stood in front of entrances but allowed access	Banners, leaflets, chanting	
17-Apr-24	CML Bromborough	1hr	Palestine Action Liverpool	10	No Police	Stood in front of gates allowing access	Banners, leaflets, chanting	
21-Apr-24	E2V Tech Lincoln	30mins	Unknown	3	No police	Damage caused to perimeter fence/gate	No entry onto site, damage repaired following day	
23-Apr-24	E2V Tech Lincoln	10mins	Unknown	1	No Police	1 individual seen early hours inspecting repaired fence and gate	Police informed, images captured	
24-Apr-24	TDS Shipley	2hrs	Bradford Friends of Palestine	30	8 officers	Slow march on approach road, standing in front of gates	Banners, chanting, hands covered in red paint	

Teledyne UK - attacks and demonstrations 2022 - 2024								
Date	**Location**	**Duration**	**Group**	**Approx numbers**	**Police attendance**	**Tactics seen**	**Remarks**	**Subsequent Action**
11-May-24	**Cumbernauld**	**15mins**	**Unknown**	**4**	**No response requested**	**4 individuals smashing windows and spraying paint. Did not enter building**	**Red paint, sledgehammers. Not assessed to be PA**	
12-May-24	Cumbernauld	20 mins	Unknown	1	Reported to Police	1 person taking photos of damaged windows	Reported to Police, they are investigating. Teledyne security investigation found that the individual was an employee but had failed to notify the control room of their visit out of hours. Employee educated and Police informed	
13-May-24	Cumbernauld	5-10 mins	Unknown	2	Reported to Police and response initiated	2 individuals walking along two aspects of the building	Police responded. No feedback from them due to investigation.	
15-May-24	**TDS Shipley**	**7 hrs**	**Palestine Action group**	**4 (3 female, 1 Male)**	**Large emergency services response**	**4 individuals gained access to reception roof and smashed roof and windows. Access to site was via a ladder against the fence. CCTV alarms activated and response called.**	**Police at heights team and fire service removed and arrested protesters from roof. Supporting demonstrators were held by Police at entrance to the industrial estate to prevent support to roof top protesters**	**Ricky Southall, Amareen Afzal, Serena Fenton released on police bail [redacted] in custody (has also attacked Barclays bank)**
7-Jun-24	CML Bromborough	10mins	Unknown	1 male	Nil	1 individual cut through fence and walked through site	Police informed, images captured	
21-Jun-24	CML Bromborough	1.5hrs	Palestine Action Liverpool	15	Large police presence	Stood in front of gates allowing access	Banners, leaflets, chanting	
21-Jun-24	CML Bromborough	10 mins	Unknown	1 male	Nil	Appears to have cut through fence and walked off site	Police informed, images captured	
5-Jul-24	**CML Bromborough**	**4 hrs**	**Palestine Action Liverpool**	**3 females**	**Large Police presence**	**3 individuals attempted to scale ladder to roof. After failing this, they rammed the vehicle gates with a van and proceeded to spray paint over the building whilst live streaming**	**Police arrested 3 protestors. All 3 released on bail. We await court dates**	
7-Aug-14	TDS Shipley	2 hrs	Bradford Friends of Palestine	Approx 20	Large Police presence	Standing in front of gates, chanting and singing	Banners, speakers etc	
18-Sep-24	**TDS Shipley**	**2 hrs**	**Bradford Friends of Palestine**	**Approx 30**	**Large Police presence**	**Standing in front of gates, chanting and singing**	**Banners, speakers etc. One individual carried a mask of [redacted]**	**Mask-wearer arrested, charged with a public order offence and bailed. Plea hearing 18 October 2024.**

Teledyne UK - attacks and demonstrations 2022 - 2024

Date	Location	Duration	Group	Approx numbers	Police attendance	Tactics seen	Remarks	Subsequent Action
23-Sep-24	**TDS Shipley**	**Aprrox 10 minutes**	**Individual - Palestine Action links**	**1 female**	**Not at the time**	**Adjoining property Myers building yard report a person driving into their yard and park alongside the shared fence to the TDY site. Myers CCTV review shows the driver arrive at main gate at 16:50 and drive into the yard looking around, they reverse and leave. The car returns at 16:53 and asks Myers staff if they can reverse around. Instead of reversing the car drives forwards and stops facing the TDY site. Individual uses a camera phone to film site. They then film Myers yard and then drive slowly to the far end of the yard. 16:55 The driver stops alongside the Teledyne shared fence and films the TDY site from 10ft away, then drives away at 1656.**	**Red Fiesta YB63KCC, one female occurpant. Reported on 101 as hostile reconnaissance against section 4 National Security Act. Crime ref 13240522712 / WYP-20240924-0741.**	**We understand from West Yorks police that the individual was arrested with four burner phones, incriminating hostile recon evidence of other locations on her phones and laptop but the phone seen on 23rd was not located. Individual is a regular at protests at the Shipley site with links to Palestine Action. The Police believe she passed the Teledyne recon phone onto Palestine Action before arrest. She gave no comment interview, then released on bail. Update from 28th Dec - CID and CPS are still deciding on next steps.**
2-Oct-24	**CML Bromborough**	**5hrs**	**Palestine Action Liverpool**	**2 males 2 females (1 male, driving the van, left immediately on electric scooter).**	**Large Police response**	**Climbed onto roof via ladder sealed in van, smashed roof and damaged production floor and clean room**	**Police arrested 3 individuals. We await court dates.**	**3 protestors released on police bail.**
30-Oct-24	TDS Shipley	5 hrs approx	Bradford Friends of Palestine	Approx 35	Immediate Police response	Standing in front of gates, chanting and singing	Originally planned for 12pm arrived at 0630hrs, banners, speakers etc	
20-Nov-24	**TDS Shipley**	**2hrs**	**Bradford Friends of Palestine**	**Approx 12**	**Police on scene**	**Standing in front of gates, chanting, singing and dancing**	**Police on scene preventing photography**	
28-Nov-24	TDS Shipley	3 hrs	Bradford Friends of Palestine	Approx 20	Police on scene prior	Initially in front of gates, Police eventually moved them across the road to allow employee access	Police on scene throughout, prevented photography	
8-Dec-24	e2v Chelmsford	N/A	Chelmsford Palestine Solidarity Campaign	n/a	Nil	Social media posted for a protest outside 1130-1330hrs 8 Dec 24. A further post was made postponing the event until 22 Dec 24	No protest took place, due to adverse weather	
19-Dec-24	**TDS Shipley**	**3 hrs approx**	**Bradford Friends of Palestine**	**Approx 17**	**Police attended both protest and subsequent lock-on attempt**	**Poster published on Bradford Friends of Palestine's Instagram account calling for a protest from 12 noon. Initial peaceful protest at top of Acorn Road. Protestors with posters and flags standing on the kerb of the pavement. Subsequent "lock-on" attempt by an individual who drove car in front of main gate.**	**Police attended site early in the morning in anticipation of an early morning blockade. None materialised. The protestors assembled at 1205 on both sides of the junction onto Acorn Park. Police in attendance. They finished at 1340 and dispersed. The police also departed. At 1437 an individual drove his car onto Teledyne property. He stopped in front of the main gate, unfurled a Palestine flag and shouted pro-Palestine slogans and insults towards Teledyne's staff. He then used a steel chain to lock himself to the steering wheel. Police arrived, removed the individual from the car and arrested him.**	**The vehicle was searched by the police who seized 2 x zombie-style knives, a brand new sledgehammer, a box of flares, small hammer, red paint and overnight bag of belongings. W York police subsequently informed us that the individual (Luke Carter) has been bailed. He had no previous arrests and no national intelligence recorded. Bail conditions not to approach / enter any Teledyne site across the UK.**

Teledyne UK - attacks and demonstrations 2022 - 2024								
Date	**Location**	**Duration**	**Group**	**Approx numbers**	**Police attendance**	**Tactics seen**	**Remarks**	**Subsequent Action**
22-Dec-24	e2v Chelmsford		Chelmsford Palestine Solidarity Campaign	25+	Not known	No protest at Teledyne site. Protest instead held on Parkway, some distance from the site.		
28-Jan-25	**TDS Shipley**	**7-8 hours**	**Palestine Action**	**3 or 4**	**Immediate police response**	**Van rammed into bollards in front of main gate. Driver left. 2 protestors carried out a "lock-on" protest having affixed themselves to the van via a chain running through a pipe concreted into the van.**	**Police attended site with specialist removal team. 2 protestors freed from the van by 1230 and arrested. Limited site disruption.**	
5-Feb-25	TDS Shipley	1hr	Bradford friends of Palestine	Approx 20	approx 10 officers	12pm, roadside protest at top of industrial park, followed by a 10 minute chant opposite side of road to vehicle gates before moving back to top of the park	Flags, banners and chanting.	
18-Feb-25	**TDS Shipley**	**Minutes**	**Not known**	**3-Jan**	**Police called after the event**	**Time 0144. Person(s) threw red paint against rear wall of building.**	**No damage apart from paint stains.**	**No arrests made.**
12-Mar-25	TDS Shipley	1hr	Bradford Friends of Palestine	13	Police on scene, prior, during and after protest	approx 0800, protesters at top of estate and then on road opposite main gates before dispersing.	No damage just chanting and placard holding.	
3-Apr-25	TDS Shipley	2hrs	Bradford Friends of Palestine	Approx 12	Police on scene prior, during and after the demonstration	1200 - roadside demonstration at top of the estate. Approx 1310, demonstrators arrived at gates and were held on opposite side of road by police. Demonstrators returned to top of park at approx 1325hrs	No damage, chanting and singing.	No arrests of protesters. However a member of the public (van driver) was arrested for hitting a protester with his van (nudging into him) and then assaulting the demonstrator. This was away from site and the driver was not part of Teledyne.
12-Apr-25	TDS Shipley	2hrs (at site) around 5 hrs in total inc march from town centre	Bradford Friends of Palestine with, we believe, Leeds PSC/Bradford PSC/Dewsbury PSC/Youtube auditors	Approx 300	Police on scene throughout and post event	Protest arrived at site approx 1445. There were a number of speeches, chanting and banner waving but remained peaceful throughout. We understand that reference to the injunction was made by organisers, warning individuals not to breach.	No damage.	No arrests although the police were asked if they would take action under National Security legislation against two Youtube auditors taking photographs. We were told that the photography was not detrimenta to national secuity. Team on site did point out that Palestine Action use such footage for hostile reconnaissance. We understand that two arrests have been made subsequently. Teledyne employees have proivded statements to the police.
18-Apr-25	TDS Shipley	1hr 20 mins	Pray for peace	Approx 11	Police on scene throughout	Arrived at 1440hrs and stood adjacent to the vehicle gate. Incident passed peacefully and they left site at 1558hrs	No damage	Peaceful and no police intervention required.

FREE PALESTINE
GAZA
LIBRE

TELEDYNE
SAUVONS LA
PLANETE
FREE

CPS Use Only

WITNESS STATEMENT (Criminal Procedure Rules R16.2, Criminal Justice Act 1967 S9)			
		URN	**05A40039624**
Statement of	**BEALE, KIERAN**		
Age if under 18	**Over 18** (if over 18 insert 'over 18')	Occupation	**POLICE CONSTABLE**
This statement (consisting of 2 page(s)) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it, anything which I know to be false, or do not believe to be true.			
Signature	**#051610 BEALE, K.**	Date	**05/07/2024 08:57**
Name / Rank / No	**Constable 051610 K BEALE**		

I am writing this statement in relation to the arrest of Autumn TAYLOR-WARD on the 6th July 2024 at 0530HRS for Aggravated Trespass and Criminal Damage.

I am Police Constable 1610 BEALE at MERSEYSIDE Police, based at WALLASEY police station. On the morning of the 6th of July 2024, I was on uniform patrol, in full uniform, in company with Constable 3596 BELFIELD, in a fully marked police car. At 04:37 we were tasked via our police personal use radios to attend TELEDYNE C M L COMPOSITES, UNIT A, OAK HOUSE, 6 TEBAY ROAD, BROMBOROUGH, CH62 3PA due to reports of protesters at the property who have driven a van though the gates, damaging the gates, spraying paint over the premises, and protesting "FREE PALESTINE".

Upon arrival, officers have located the van which was parked inside the property after driving through the gates to gain access. This has caused damage to the gates. One female was on top of the van holding a red flare shouting "FREE PALESTINE" whilst recording this incident on their phone. She also had a canister of red paint which she was spraying across the floor of the premises. Another female was outside of the property and away from the main building holding a sledgehammer and a red flare whilst shouting "FREE PALESTINE". The final female was located inside of the van in the passenger seat and had locked themselves in.

Colleagues have cautioned and arrested the female holding the sledgehammer and the red flare. Officers have then approached the van and have gained entry to the vehicle by smashing the passenger window and opening the door from the inside. The female was subsequently detained, handcuffed to the rear back-to-back position and searched by colleagues.

At 05:30 TAYLOR-WARD was brought to the rear of the police carrier by colleagues to which I cautioned and arrested her for Aggravated Trespass and Criminal Damage to which she made no reply. The necessity for this arrest was to prevent damage and to allow a prompt and effective investigation. The female was then placed into a caged vehicle and was transported to WIRRAL CUSTODY where her detention was authorised.

I had no further dealings with this matter.

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WITNESS STATEMENT

(Criminal Procedure Rules R16.2, Criminal Justice Act 1967 S9)

		URN	
Statement of	**BELFIELD, PHILLIP**		
Age if under 18	**Over 18** (if over 18 insert 'over 18')	Occupation	**POLICE OFFICER 3596**
This statement (consisting of 3 page(s)) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it, anything which I know to be false, or do not believe to be true.			
Signature	**#053596 BELFIELD, P.**	Date	**05/07/2024 08:55**
Name / Rank / No	**Constable 053596 P D BELFIELD**		

I am Constable Phillip BELFIELD 3596 of Merseyside Police, based at Upton Police Station. On the morning of Friday 5th July 2024 I was on duty, in full uniform, with Constable 1610 BEALE, in a fully marked police car. At 04.45 hours we were tasked via our police personal issue radios to attend Teledyne C M L Composites, Unit A, Oak House, 6, Tebay Road, Bromborough, Wirral, Merseyside, CH62 3PA, due to a report of protesters causing damage at this location. I also heard over my police radio that other police patrols were attending the same incident.

I drove to the location using the police cars emergency warning lights and sirens. Upon arrival I could see Constables 7194 DUCKITT and 2855 BOYD at scene. The location is an industrial unit, surrounded by anti-climb fencing. There was a gate through the fencing which was ajar. This appeared to be an electric gate, but the arms which open the gate were snapped off, causing the gate to remain partly open. There was a white panel van parked a short distance past the gate, as though it been driven through the gate and left there. There was a female sat on top of the roof of this van, whom I now know as Mais ROBINSON (dob. 03/10/1993). Around the van, on the floor and up the building, I could see red paint, as though it had recently been sprayed around from the van. This paint was still wet.

I could see a second female stood just outside the fencing, holding a sledgehammer in her hand. I now know this female as Cheryl LEANAGHAN (dob. 03/06/1984). She was holding the handle of the sledgehammer, with the hammer head down. Whilst holding it, she was varying between slowly spinning around and standing face on to us, as though to offer violence. She then lifted the head of the hammer and struck the anti-crime fence with the head of the hammer. The fence shook, but I did not see any damage caused by the strike. LEANAGHAN then put the sledgehammer down and picked up a flare, setting this off so that red smoke was spraying out of the top of it. I could hear the two females shouting "FREE PALESTINE." Constable BOYD and I walked towards LEANAGHAN and she held the flare up high, with both her arms up and out to the sides, making herself look bigger, making me think she may use the flare to assault us. This stance is classed as a warning sign to the police, as it is often used to intimidate people prior to violence. As we got very close to her, LEANAGHAN threw the flare onto the ground, allowing Constable BOYD and I to quickly grab hold of her, before she was able to pick up any more weapons or take any weapons out of her pockets. I took her left arm and Constable BOYD took her right, pulling LEANAGHAN to the ground, with Constable BOYD arresting her. LEANAGHAN struggled on the floor, making it difficult to get her handcuffs on. After a short struggle we were able to handcuff her to rear. Due to the struggling they were not in the perfect position, but were the best we could manage in the circumstances. She was then rolled onto her side, in a semi- recovery position, to help her to breath better. As this was happening, other officers were arriving on scene, including a female officer who searched LEAGHAN. I was also informed there was a third female in the front passenger seat of the van, whom I now know as Autumn WARD (dob. 11/09/2003). Upon the arrival of a fully marked police van, LEANAGHAN was escorted to this and sat in the prisoner cage at the rear. With LEANAGHAN securely in the police van, I went over to other officers to assist with the other two females. Whilst we were discussing what to do next, I saw WARD pass a black bag out of the van, to ROBINSON, who was still on the roof. I then saw ROBINSON pull a fire extinguisher out of this bag. It was

decided that we would remove WARD first from inside the locked cab of the white panel van. When WARD refused to unlock the van door, Constable BOYD used his baton to smash the front passenger window, reach in and open the door. Whilst this was happening, ROBINSON was using the fire extinguisher to spray paint all around, as it was full of red paint. The paint was going all around the van, including the floor, the building and parked cars nearby. WARD was subsequently pulled out of the van and arrested by Constable BEALE. During the arrest, due to WARD struggling, I assisted Constable BOYD in taking her to the floor into a ground pin position, from where she was handcuffed to the rear. Again, she was struggling, meaning we had to do the best we could to handcuff her, given the circumstances. Upon the arrival of a second van, WARD was sat in the prisoner cage at the rear of this one. Other officers then got onto the roof of the panel van with ladders and arrested ROBINSON. With all three detained, Constable BEALE and I escorted WARD to Wirral Custody Suite, where her detention was authorised by the custody sergeant.

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WITNESS STATEMENT (Criminal Procedure Rules R16.2, Criminal Justice Act 1967 S9)			
		URN	**05A40039624**
Statement of	**HICKS, D**		
Age if under 18	**Over 18** (if over 18 insert 'over 18')	Occupation	**POLICE SERGEANT**
This statement (consisting of 3 page(s)) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it, anything which I know to be false, or do not believe to be true.			
Signature	**#055407 HICKS, D.**	Date	**05/07/2024 10:17**
Name / Rank / No	**Constable 055407 D HICKS**		

I am Sergeant 5407 David HICKS of Merseyside Police stationed at Wallasey Police Station.

At approximately 04.50 hours on Friday 5th July 2024, I was on mobile patrol using the callsign AS181, when because of a radio message from the control room I attended to a report of possible protesters who had gained entry to a secure site on TEBAY ROAD, BROMBOROUGH. The information that was being received was that the group were shouting "FREE PALASTINE" and that the group had used a van to ram the gates to gain entry to the compound and that the protesters were attempting to get on the roof of the building and were setting off flares.

Upon arriving at the location I began to asses the situation and saw that one female protestor had been arrested for possession of an offensive weapon as she had been in possession o a sledgehammer, and within the compound, through the clearly damaged security gates, caused by the van being used to ram through the gates and there was one female protester who was on the roof of the van and was spraying red pain from what looked like an improvised fire extinguisher. There was also a third female sat in the passenger side of the van, with the registration GN10 HBY.

From looking around the compound there was a large amount of red pain that had been sprayed on the side of the building, as well as on a vehicle belonging to one of the site security guards, the registration of this vehicle being [redacted], and this was a Ford Mondeo estate.

I made the assessment that the group of protestors were armed, given that one was already under arrest for being in possession of a sledgehammer, and there was a clear risk to the members of staff who were working nights at the site. Therefore, I made sure I had additional patrols in attendance then began to formulate a plan to arrest the other 2 protestors.

I directed my officers to form a small shield team so that the vehicle could be thoroughly checked, and any additional weapons located. A shield team, along with Taser officers were formed and the officers were directed to approach the near side of the vehicle and try to engage with the female who was sat inside the locked vehicle, the officers were directed to engage with the female, but if this wasn't effective they were to use force to access the vehicle and safely remove the female protestor and arrest her. Utilising the shield team to provide protective cover from the protestor on the roof of the van, who was spraying paint and had other objects with her, officers began engaging with the female in the vehicle, however these negotiations were unsuccessful, and the window was smashed, and the female protestor safely removed away and arrested.

I then began assessing how to safely remove the third female protestor from the roof of the vehicle, with my consideration being her safety as she was at a height, as well as the fact that she was in possession of spray paint, and I couldn't see clearly if she had any additional objects. I reformed the team and directed the officers to carry out a search of the vehicle to check for any potential weapons and to ensure that these were removed. The officers searched the vehicle and removed numerous items, including a DEWALT grinder, crowbar, hammer, as well as additional improvised fire extinguishers for spraying paint. Once the vehicle had been checked and the items removed, I again reformed my team, and I directed the officers as to how we were going to get the female from the roof of the van as safely as possible. I directed

Constable 7743 Ballinger to begin engaging with the female protestor and try to establish a rapport and work through an appeal process to see if she would safely come down, when this was unsuccessful, I directed officers using a ladder to approach the rear of the van whilst another officer was at the front of the van. The female protestor was then quickly and safely secured, and brought down from the van, and was then arrested.

The three females were then placed in police vehicles and removed from the location.

I now exhibit the following –

DJH01 refers to body worn camera footage using U08186 showing approach to vehicle and arrest of 2 female protestors.

DJH02 refers to photograph of vehicle [redacted]

DJH03 refers to photograph of items removed from [redacted]

DJH04 refers to photograph showing paint covered vehicle.

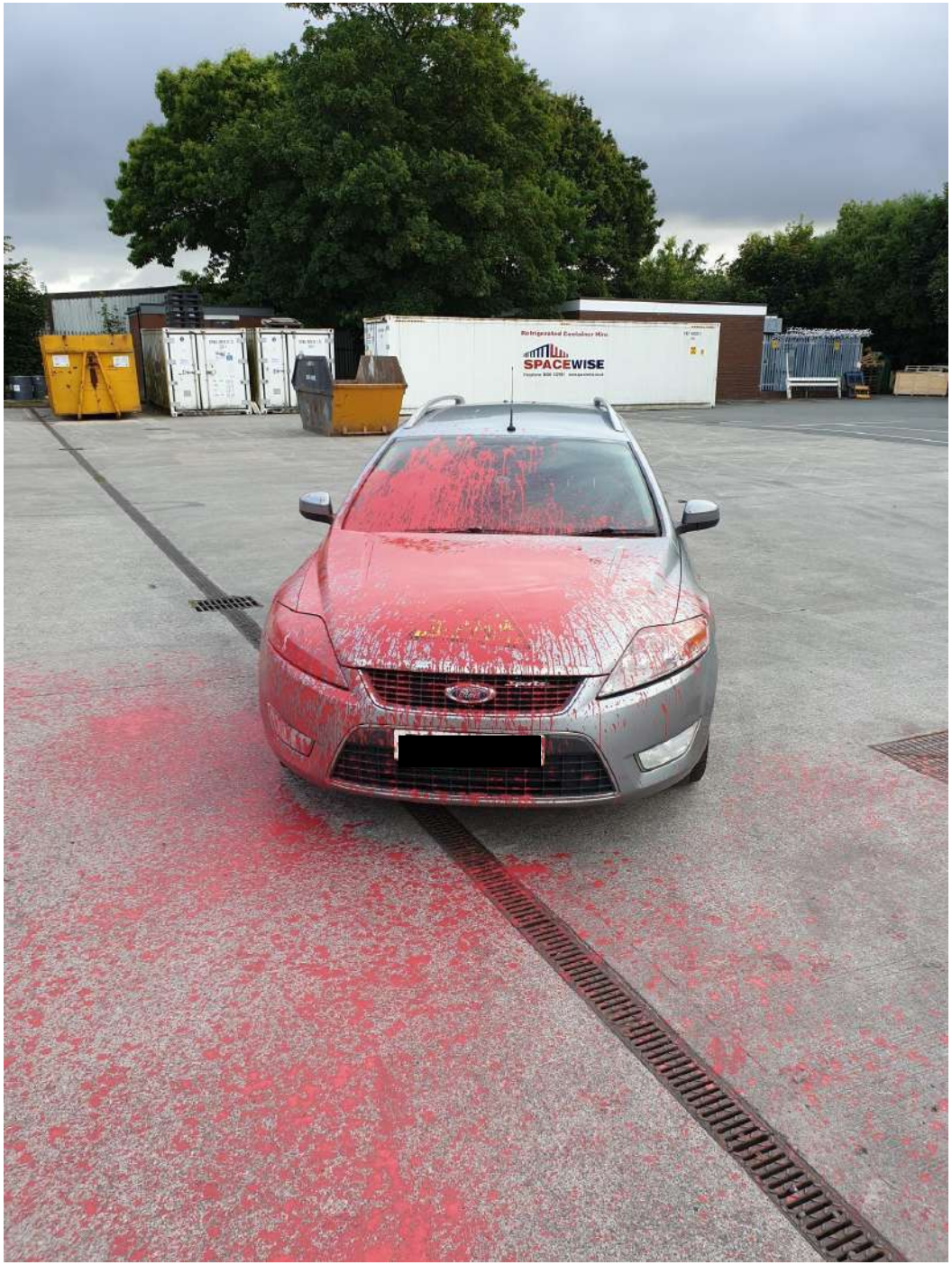
DJH05 refers to photograph showing building with red paint sprayed.

DJH06 refers to photograph showing building with red paint sprayed.

I then remained at the location and preserved the scene and speak with staff from the premises.

CN10 HBY

675


SPACEWISE

677

23

Image 1

Image 2

Image 3

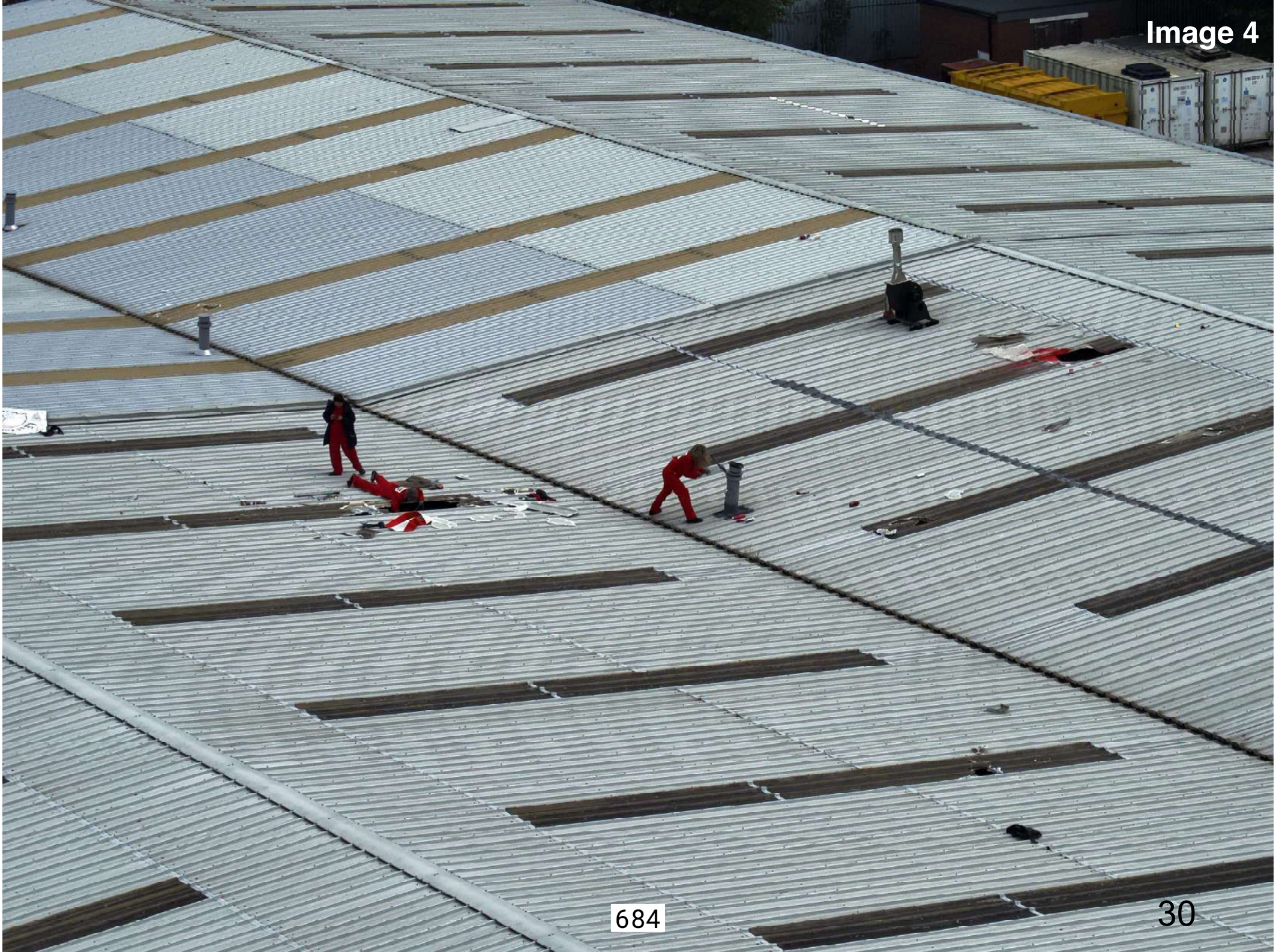


Image 4

Image 5

Image 6

Image 7

Image 8

Image 9

Image 10

Image 11
691
37

Image 12

Image 13

Image 14

Image 15
PALESTINE
ACTION

Image 16

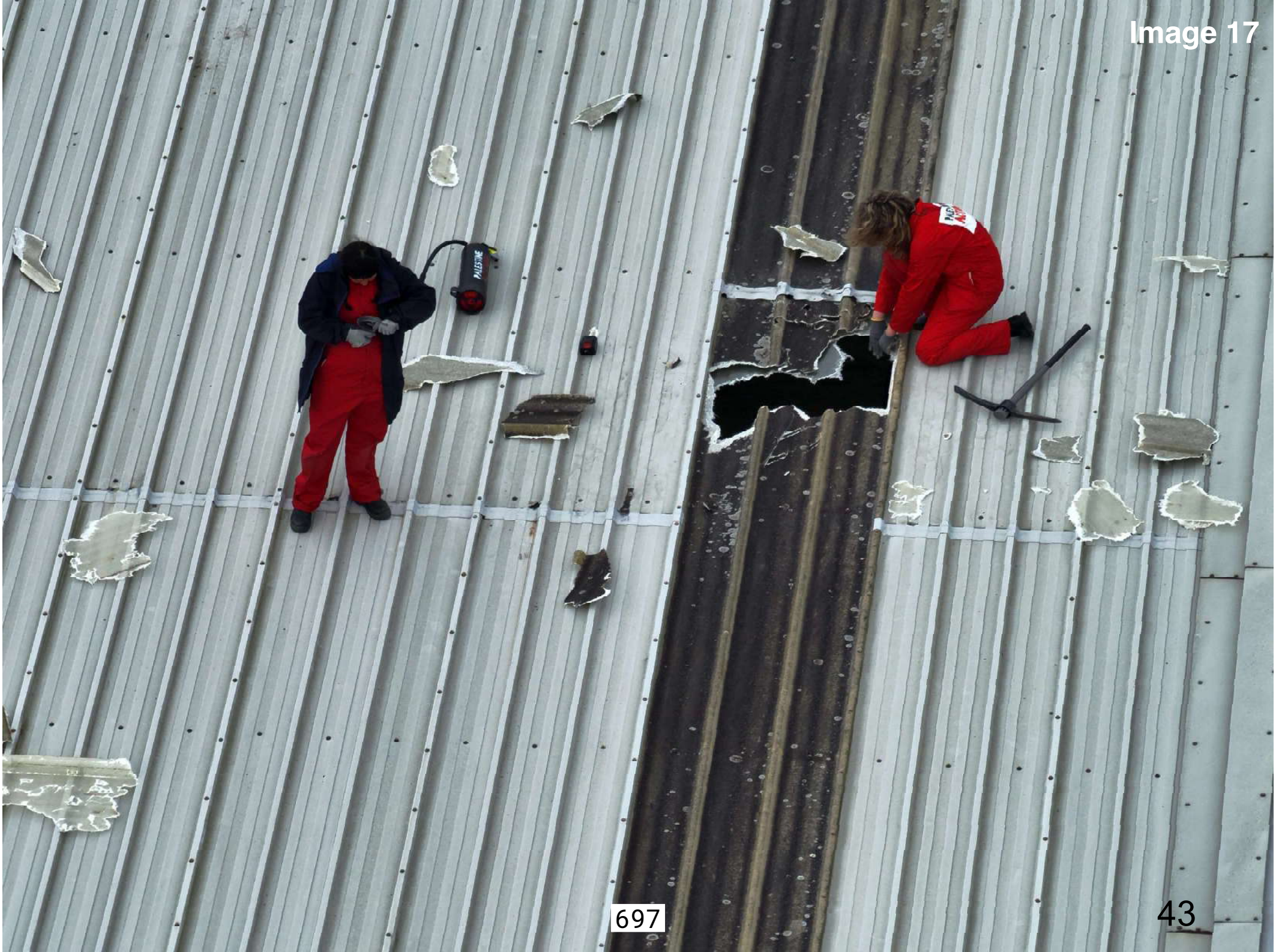


Image 17

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WITNESS STATEMENT

(Criminal Procedure Rules R16.2, Criminal Justice Act 1967 S9)

		URN	**05A40056924**
Statement of	**SWANSON, LUKE**		
Age if under 18	**Over 18** (if over 18 insert 'over 18')	Occupation	**POLICE CONSTABLE**
This statement (consisting of 3 page(s)) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it, anything which I know to be false, or do not believe to be true.			
Signature	**#057599 SWANSON, L.**	Date	**02/10/2024 15:56**
Name / Rank / No	**Constable 057599 L SWANSON**		

I am POLICE CONSTABLE 7599 SWANSON of MERSEYSIDE POLICE based at OPERATIONAL COMMAND CENTRE SPEKE with MATRIX DISRUPTION SYNDICATE 3. On WEDNESDAY 2ND OCTOBER 2024, I was on duty in full uniform. At around 0800 hours, I was briefed in relation to an ongoing incident at Teledyne, Tebay Road, Bromborough, Wirral. Teledyne is a company that provides services to the aerospace and defence industry. The briefing stated that persons from a protest group Palestine Action had broken into the Teledyne premises and were causing damage within. Colleagues from Matrix and I were deployed to the incident. I was part of Callsign XU22.

We arrived at the location at around 0915 hours where we were further briefed by officers on scene. They stated that the persons on the premises had broken in through the roof and were within the roof space. From that roof space they had used tools to break through to the factory floor in several locations. Red paint was then sprayed onto machinery and manufacturing parts. Damage had been caused throughout to both machinery and parts with items being thrown at them by the persons. Information was also passed that they had thrown items at attending officers from the roof and were in possession of pickaxes. Due to this information, the decision was made for officers to wear protective public order kit. I entered the building a short time later in company with colleagues and made to the location where the persons were suspected to be.

As I made my way through the building, I could see several damaged areas to the roof and paint below across the factory floor and equipment where it had been sprayed down.

I met with other colleagues in 'F35 – CLEAN ROOM 2.' I could hear noises and loud banging from above where the persons were using tools to break through the ceiling. At several points they smashed through the ceiling, throwing items down onto manufactured parts and knocking down air vents in the process. This carried on for a time until colleagues spotted the persons within the roof space above. Officers challenged the persons, who I could now see were dressed in full height red boiler suits. Two of the persons agreed to come down from the roof space via a ladder.

I dealt with the second person to come down the ladder to officer, who did not identify themselves at this point but were later identified as GABRIELLE MIDDLETON. I took a hold of MIDDLETON and placed them into handcuffs in the front stack position to prevent any escape. At this point at 1015 HOURS, I informed MIDDLETON they were under arrest on suspicion of Burglary and Criminal Damage. I cautioned MIDDLETON to which they made no reply. I informed them the arrest was necessary for a prompt and effective investigation, and to prevent and further loss or damage to property. MIDDELTON at this point did not identify themselves. MIDDLETON was further informed that their arrest was necessary to ascertain their name and address. MIDDLETON stated that they preferred to be searched by a female officer. MIDDLETON was searched by CONSTABLE 1659 THOMPSON. During the search a mobile phone and USB memory stick was located. I seized and exhibit these as follows:

-LS01 – 1 X BLACK APPLE IPHONE

-LS02 – 1 X USB MEMORY STICK

I activated my bodyworn video during arrest which I exhibit as LS03.

Following MIDDELTONS arrest, I took them outside, handing them over to a colleague to convey them to custody.

This is my first written account of this matter and I have nothing further to add at this time.

CPS Use Only

WITNESS STATEMENT (Criminal Procedure Rules R16.2, Criminal Justice Act 1967 S9)			
		URN	
Statement of			
Age if under 18	(if over 18 insert 'over 18')	Occupation	
This statement (consisting of 4 page(s)) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it, anything which I know to be false, or do not believe to be true.			
Signature	**#051659 THOMPSON, S.**	Date	**02/10/2024 15:47**
Name / Rank / No	**Constable 051659 S THOMPSON**		

I am Police Constable 1659 THOMPSON of Merseyside Police currently based at the Operational Command Centre, Speke, L24 as part of Matrix Disruption.

On Wednesday 2nd OCTOBER 2024 I was on full uniformed duties and was briefed as part of a team by Police Sergeant 2182 WILDMAN in relation to protestors from 'PALESTINE ACTION' gaining entry to a manufacturing plant.

I was informed that there were three protestors and they had gained entry via the roof space to TELEDYNE COMPOSITES, 6 TEBAY ROAD, UNIT A, BROMBROUGH, CH62 3PA.

As part of an entry and arrest team I headed over to the location in company with Police Constable 4135 MCGHEE.

We arrived around 09:15 hours and were briefed by Police Sergeant 6738 MAY who then led a team of us into the premises.

I was dressed in full public order attire including a helmet due to the mention that the protestors were throwing objects and paint around the premises.

In one of the main manufacturing rooms, I could see substantial damage being caused to roof space. The roof tiles were being smashed and red paint had been thrown over a lot of the machinery by the protestors.

I was informed by colleagues that one of the protestors in the roof space was using a large pickaxe to cause the damage. The females were dressed in red boiler type suits.
Colleagues began to try and engage with the protestors and explain that they needed to stop causing damage and needed to come down from the roof space.

The first protestor to climb down a ladder and exit the roof space I now know to be Lara DOWNES (12/03/82).

At 10:15 hours I cautioned and arrested DOWNES on suspicion of burglary. To which they replied, “I UNDERSTAND”.
DOWNES’ arrest being necessary to prevent any further damage to property and injury to any persons.

I searched DOWNS and seized several items from them which I exhibited as:
ST/01- RED BOILER SUIT
ST/02- PAIR OF PROTECTIVE GLOVES
ST/03- GO PRO
ST/04- USB
I could see DOWNES appeared to be agitated and looking around the premises. There were hazards present and to prevent her escape or any injuries I placed DOWNES in handcuffs in a front stack position. I checked the cuffs for fit before double locking them.

At 10:37 hours I reminded DOWNES that they were still under caution and further arrested them on suspicion of criminal damage. To which they made no reply.

DOWNES was then transported to custody by other officers.

I assisted colleagues in searching two other protestors who I now know to be Gabrielle MIDDLETON (22/02/00) and Annabelle BARRINGER (09/10/98).

During the arrest and search of DOWNES and search of MIDDLETON I utilised my body worn camera. The footage I exhibit as ST/05 which has been marked evidential.

The search of BARRINGTON I exhibit on my body worn camera as ST/06, marked as evidential.

Once the protestors had been removed from the premises the building was searched and no other persons were located within.

All exhibits were booked into the Merseyside Police property system and left in the secure store at The Operational Command Centre.

I obtained images of the items seized from DOWNES I exhibit the images as:

ST/01A- IMAGE OF ST/01- RED BOILER SUIT

ST/02A- IMAGE OF ST/02- PAIR OF PROTECTIVE GLOVES

ST/03A- IMAGE OFST/03- GO PRO

ST/04A- IMAGE OFST/04- USB

I played no further part.

I MAKE THIS STATEMENT AS MY ORIGINAL NOTE.

the Edinburgh Reporter

Protesters climb the outside of Queen Elizabeth House

By **Phyllis Stephen** - March 6, 2024 2:40 pm

On Wednesday morning protesters from the This is Rigged group scaled the UK Government building on Sibbald Walk known as Queen Elizabeth House and daubed it with red paint.

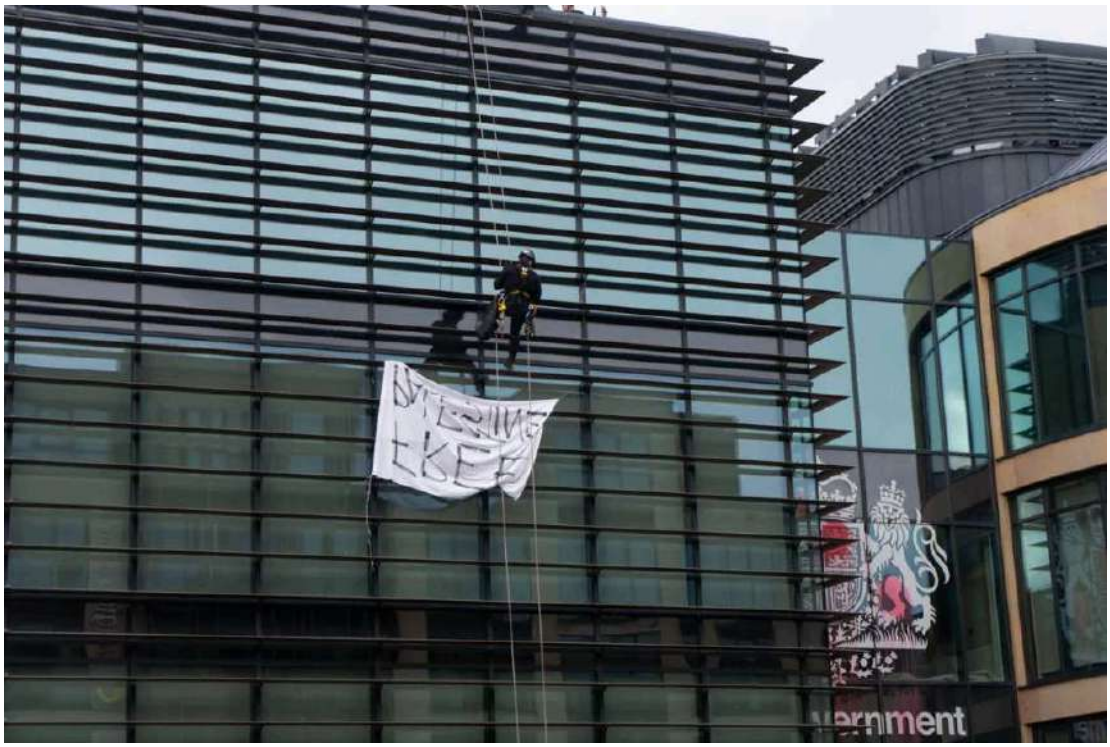
Catriona Roberts, 21, sprayed the glass front of the building with a fire extinguisher full of red paint. Fred Spoliar, 31, Ruby Hamill, 19, and Daniel Knorr, 22, climbed the exterior of the building. Spoliar threw water balloons full of red paint towards the UK Government's crest on the building's facade, and Hamil threw the UK flag from the top of the building, replacing it with a Palestinian one.

The protesters say that today's action was targeted due to the fact that the UK Government continues to endorse the genocide in Gaza. They have pointed out that even though a majority of the UK public supports a ceasefire, also backed by The Scottish Government, the UK Government has continued to support Israel. The group also said that the UK Prime Minister, Rishi Sunak has announced a new crackdown on pro-Palestinian protests with extreme policing measures to be put in place.

By 2pm police officers using climbing gear had ascended to the roof and abseiled down the front of the building to release the Free Palestine banner and the crowds dispersed.

This is Rigged protesters scaled the UK Government buildingon Sibbald Walk in Edinburgh and doused it with red paint.

This is Rigged protesters scaled the UK Government buildingon Sibbald Walk in Edinburgh and doused it with red paint.



This is Rigged protesters scaled the UK Government buildingon Sibbald Walk in Edinburgh and doused it with red paint.

This is Rigged protesters scaled the UK Government building on Sibbald Walk in Edinburgh and doused it with red paint sparking a huge police presence

Phyllis Stephen

Website | + posts

Founding Editor of The Edinburgh Reporter.
Edinburgh-born multimedia journalist and iPhoneographer.

Phyllis Stephen

http://www.theedinburghreporter.co.uk

Founding Editor of The Edinburgh Reporter. Edinburgh-born multimedia journalist and iPhoneographer.

Man and woman in court over damage to Trump Turnberry golf resort in Scotland

Red spray paint was used to deface the Trump Turnberry clubhouse, while damage was also caused to its greens.

Jenness Mitchell
Scotland reporter @Jenster13

Monday 7 April 2025 15:17, UK

Pic: PA

Why you can trust Sky News >

A man and a woman have appeared in court accused of maliciously damaging a Scottish golf course owned by US President Donald Trump.

Police were called to the Trump Turnberry course in South Ayrshire at around 4.40am on Saturday 8 March.

Officers found red spray paint had been used to deface the 800-acre resort's clubhouse, while its greens were also damaged.

Suspects Ricky Southall, 33, and Uzma Bashir, 55, were arrested and charged on Friday in connection with the damage.

Southall was arrested in Wakefield, while Bashir was arrested in Leeds, both West Yorkshire.

The pair appeared before Ayr Sheriff Court on Monday where they made no plea to the single charge of malicious mischief.

Both were granted bail pending a further court appearance

MORE ON DONALD TRUMP

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Donald Trump playing golf at his Trump Turnberry course in 2023. Pic: PA

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A Scottish government publication from October 2023 defines the common law offence of malicious mischief as the "wilful, wanton and malicious destruction of, or damage to, the property of another".

It notes the charge should only be recorded "where widespread damage is caused, where the value of the damage is considerable, or where there is disruption of power supply, flooding or similar".

The publication says there is no specific monetary value at which a potential crime should be recorded as malicious mischief rather than vandalism, but multiple thousands of pounds of alleged damage would be required.

Read more from Sky News:

Wildfire rescue boss warns 'we are not out of danger yet'

Seven people in hospital and homes evacuated after fire

Co-accused Kieran Robson, 33, was arrested and charged last month in connection with the case.

He also made no plea to the charge of malicious mischief when he **appeared in the same court on 31 March**.

A 75-year-old man and a 66-year-old woman were also arrested last month as part of the investigation following enquiries in Oban, Argyll and Bute.

Both were later released pending further inquiries.

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PALESTINE ACTION WRECK TRUMP'S GOLF COURSE: "GAZA IS NOT FOR SALE"

Mar 8, 2025

Pictures and videos from the action are available here

Drone footage free to use – with credit to Hassan Ghani, Freelance Journalist

Palestine Action have struck overnight to wreck the 'Trump Turnberry' golf course, in response to the American administration's plans and threats to destroy, ethnically cleanse, and 'take over' the Palestinian Gaza Strip.

After entering the 800-acre resort, activists painted in 3-metre-high letters, "GAZA IS NOT FOR SALE" across the lawn of the South Ayrshire course. Making the popular opposition to Trump's intentions clear, activists spray painted the club house and dug up the greens including the course's most prestigious holes – used in numerous Open Championships.

Last night's action comes as a direct response to the US administration's stated intent to ethnically cleanse Gaza. Having laid out his plans to "*clean out the whole thing*" and forcibly displace its population [1], the US President last week published an AI video advertising his plans for the Strip, which included himself and the génocidaire Netanyahu, shirtless, drinking at the 'Trump Gaza' resort [2].

The proposed ethnic cleansing of Gaza and the forcible transfer of the Palestinian population would constitute war crimes and crimes against humanity. And while Trump threatens to kill all of Gaza's 2m population – "*To the People of Gaza: A beautiful Future awaits, but not if you hold Hostages. If you do, you are DEAD*" [3] – his administration is, simultaneously, preparing its plans for Israeli annexation of the Palestinian West Bank [4].

A spokesperson from Palestine Action has stated:
"Palestine Action rejects Donald Trump's treatment of Gaza as though it were his property to dispose of as he likes. To make that clear, we have shown him that his own property is not safe from acts of resistance. We will continue to take action against US-Israeli colonialism in the Palestinian homeland."

The action comes shortly after the Trump administration signed off on the shipment of 40,000 bombs to Israel [5], including thousands of the bunker-buster bombs of the type which have been used to "vaporise" dozens of Palestinians in single attacks [6].

Trump's previous term saw him draw ever-closer links with Elbit Systems, Israel's largest weapons company and Palestine Action's primary target, relying on them heavily for maintaining his militarised US-Mexico border wall [7]. As a final favour to his partners, one of the last acts of his first term was ensuring that Elbit Systems of America was able to complete a legally-dubious takeover of a naval technology firm [8].

ENDS

NOTES TO EDITORS

Palestine Action is a direct-action network of groups and individuals operating to end complicity in occupation, apartheid, and genocide in Palestine. The principle target of Palestine Action's campaign is Elbit Systems, Israel's largest weapons company, which has been forced to close numerous arms factories due to relentless efforts.

For media inquiries contact media@palestineaction.org

[1] https://truthout.org/articles/trump-plan-for-gaza-worse-than-ethnic-cleansing-says-un-human-rights-expert/

[2] https://www.nybooks.com/online/2025/03/02/trump-gaza-number-one/

[3] https://www.middleeasteye.net/news/us-president-donald-trump-threatens-palestinians-gaza-death-stunning-social-media-post

[4] https://mondoweiss.net/2025/02/coming-soon-trump-plan-for-israeli-annexation-of-the-west-bank/

[5] https://www.palestinechronicle.com/new-us-arms-deal-to-israel-3-billion-and-thousands-of-bombs/

[6] https://www.aljazeera.com/news/2024/9/12/what-bombs-did-israel-use-against-the-al-mawasi-safe-zone-in-gaza

[7] https://www.jstor.org/stable/26508573

[8] https://www.forbes.com/sites/craighooper/2021/01/25/trump-linked-billionaire-flipping-last-us-owned-sonobuoy-maker-to-foreign-buyer/

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Woman accused of displaying antisemitic posters

Serena Fenton did not enter a plea during Monday's hearing

20 January 2025

A woman has appeared in court accused of putting up antisemitic posters in Leeds.

Serena Fenton, of Foxcroft Green in Headingley, allegedly displayed the posters in Alwoodley on 16 December, Leeds Crown Court was told earlier.

The 57-year-old has been charged with racially intentional harassment and using threatening or insulting words to cause harassment.

She did not enter a plea at Monday's hearing. A pre-trial and preparation hearing was listed at the same court for 17 February, with Ms Fenton granted conditional bail.

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"PROTEST IS BEGGING THE POWERS THAT BE TO DIG A WELL. DIRECT ACTION IS DIGGING THE WELL AND DARING THEM TO STOP YOU"

– Late David Graeber

OUR STRATEGY

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DIRECT ACTION TRAINING DAY [CANTERBURY]
DATE: May 11, 2025
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DATE: May 18, 2025
TIME: All Day Event
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DIRECT ACTION TRAINING DAY [CARDIFF]
DATE: May 24, 2025
TIME: All Day Event
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DIRECT ACTION TRAINING DAY [LONDON]
DATE: May 25, 2025
TIME: All Day Event

DIRECT ACTION TRAINING DAY [LEEDS]
DATE: June 1, 2025
TIME: All Day Event
WEBSITE: BOOK HERE

SUPPORT UPCOMING TRIALS

THE #FILTON18 HEARING
DATE: May 2, 2025
TIME: 9:30 am - 4:30 pm
VENUE: Old Bailey Crown Court
LOCATION: Central Criminal Court, Old Bailey, London EC4M 7EH,

THE #UAV5BLOCKADE PLEA-HEARING
DATE: May 12, 2025
TIME: 9:30 am - 1:30 pm
VENUE: Stafford Crown Court
LOCATION: The Combined Court Centre, Victoria Square, Stafford ST16 2QQ,

THE #BRADFORD 4 TRIAL
DATE: May 12
TIME: 9:30 am - 5:00 pm
VENUE: Bradford crown court
LOCATION: Exchange Square, Drake Street, Bradford BD1 1JA, United Kingdom

THE #DISCOVERYPARK7 PLEA-HEARING
DATE: May 12, 2025
TIME: 9:30 am - 4:30 pm
VENUE: Canterbury Crown Court
LOCATION: The Law Courts, Chaucer Rd, Canterbury CT1 1ZA, United Kingdom

THE #INSTRO8 TRIAL
DATE: May 19
TIME: 9:30 am - 4:30 pm
VENUE: Margate Magistrates
LOCATION: Cecil Square, Margate CT9 1RL,

THE #FERRANTI5 TRIAL
DATE: May 19
TIME: 10:00 am - 4:30 pm
VENUE: Minshull Crown Court
LOCATION: Minshull Street, Manchester M1 3FS, United Kingdom

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JOIN THE RESISTANCE

Get involved in the direct action movement bringing down the Israeli weapons industry.

DIRECT ACTION

DIRECT ACTION TRAINING DAYS

Palestine Action is running training days across the country, to bring together like minded people for a day of talks, trainings and group discussions.

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Can't make a training day? Join an online crash course on direct action to find out how you can be part of this campaign and help us #ShutElbitDown.

REGISTER NOW

ONLINE GLOBAL CRASH COURSE

Palestine Action is a global movement. Join an online workshop to learn about taking direct action in your country.

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UNDERGROUND GUIDE

A guide on taking underground action against companies which enable and profit from Palestinian oppression.

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Find out when upcoming trials and hearings are coming up near you and show up to support actionists.

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Join an online workshop to get involved in our dedicated support team.

JOIN AN ONLINE WORKSHOP

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Support actionists imprisoned for alleged direct action against the zionist war machine.

SUPPORT OUR PRISONERS

SUPPORT NEWSLETTER

Get regular updates and notifications of Palestine Action cases near you by signing up for our support newsletter.

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NEWSLETTER

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JOIN PALESTINE ACTION

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Last Name

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Zip/Postal Code *

PHONE NUMBER *

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ARE YOU INTERESTED IN TAKING DIRECT ACTION AGAINST ISRAEL'S ARMS TRADE? *

YES
NO

IF YES TO THE ABOVE, HAVE YOU TAKEN PART IN A PALESTINE ACTION DIRECT ACTION WORKSHOP?

YES
NO

ARE YOU PREPARED TO SUPPORT ACTIONISTS AT COURT AND POLICE STATIONS? *

YES
NO

If you are not already subscribed, would you like to receive email updates from Palestine Action? *

Yes, opt in to email updates
No, do not opt in

Note: If you subscribed earlier, this will not unsubscribe you. You can unsubscribe using the link provided in emails you receive. You can always take action without opting in.

I'M IN

Sponsored by: Palestine Action

DIRECT ACTION TRAINING DAYS

Direct action is effectively disrupting the Israeli weapons industry. Training days help equip you with the knowledge to join the resistance.

APPLY NOW

The Israeli war machine is operating in Britain, and through direct action we can stop it in its tracks. Read more about our strategy here.

As part of the fight for Palestinian liberation, it's important to recognise how close to home the Israeli war industry is and how we can impact it. Britain is home to several Israeli weapons firms, including Israel's largest weapons firm, Elbit Systems. Elbit manufacture tanks, bullets, drones and munitions for the Israeli military and market their weaponry as "battle-tested" – tested on Palestinian men, women and children.

The British government has been complicit in the colonisation of Palestine for over 100 years – protests and lobbying efforts has failed to change that. This refusal for the powers that be to end their participation in Israeli war crimes, and the presence of Israeli weapons factories on our doorstep, demands a more effective and direct approach – direct action.

In the words of the late David Graeber: "Protest is like begging the powers that be to dig a well. Direct action is digging the well yourself and daring them to stop you"

Palestine Action is running training days across the country, to bring together like minded people for a day of talks, trainings and group discussions. All of which is geared towards harnessing the strength of the grassroots and directing it towards bringing down Israel's war machine.

JOIN A DIRECT ACTION TRAINING DAY

If you're interested, please fill in the application form. The location of the training day will not be disclosed in advance. We advise you to download signal messenger at signal.org/download where we will contact you directly. Only those who pass our vetting procedure will be informed of the location and allowed to participate.

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DIRECT ACTION TRAINING DAY [EDINBURGH]

DATE: May 18, 2025
TIME: All Day Event
WEBSITE: BOOK HERE

DIRECT ACTION TRAINING DAY [CARDIFF]

DATE: May 24, 2025
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DIRECT ACTION TRAINING DAY [LONDON]

DATE: May 25, 2025
TIME: All Day Event

DIRECT ACTION TRAINING DAY [LEEDS]

DATE: June 1, 2025
TIME: All Day Event
WEBSITE: BOOK HERE

ABOUT

Palestine Action is a direct action movement committed to ending global participation in Israel's genocidal and apartheid regime. Using disruptive tactics, Palestine Action targets corporate enablers of the Israeli military-industrial complex and seeks to make it impossible for these companies to profit from the oppression of Palestinians.

OUR TARGET

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

FIND OUT MORE

OUR STRATEGY

Palestine Action takes strategic, sustained and focused **direct action** against key targets, in order to maximise disruption against key pillars of Israel's military-industrial complex. We do not appeal to politicians or anyone else to create the necessary changes, as we understand the depth of complicity within most global institutions. Rather than begging those who are complicit to gain a moral compass, we go straight to the source and shut down the production of Israeli weapons.

FIND OUT MORE

OUR VICTORIES

By taking direct action against focused targets, we have achieved a number of victories. Palestine Action has forced Israeli weapons factories to permanently close down, companies to cut ties with Elbit and lost Elbit lucrative contracts worth £billions.

FIND OUT MORE

THROUGH SUSTAINED DIRECT ACTION, PALESTINE ACTION HAS FORCED ELBIT TO SHUT DOWN WEAPONS FACTORIES, LOSE LUCRATIVE CONTRACTS AND PARTNERSHIPS WITH SEVERAL OTHER FIRMS.

GET INVOLVED

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legalsupport@palestineaction.org

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General Enquiries
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IMPORTANT LINKS

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PALESTINE ACTION TARGET ELBIT'S ACCOUNTANTS AND INVESTORS

May 14, 2025

Images available are free to use, with the relevant credit

In the early hours of Wednesday 14th May, activists from Palestine Action targeted Edwards Accountants in Birmingham and JP Morgan at Victoria Embankment in London. Both firms were covered in red paint, and the front glass doors of JP Morgan were completely shattered.

Both firms directly enable the operations of Israel's biggest weapons producer, Elbit Systems. Edwards Accountants are the listed accountants for Elbit Systems UK and its subsidiaries, whilst JP Morgan hold Elbit shares worth over $22million in the Israeli weapons maker. On 12th May, financial reports showed JP Morgan had reduced their investment in Elbit Systems by over 53%. However, they still remain a major investor in the company which is a major supplier of weapons for the Israeli military, which is committing genocide in Gaza.

Elbit supplies over 85% of Israel's military drone fleet and land based equipment, as well as missiles, bullets, targeting gear, digital warfare and surveillance technology. The Israeli weapons maker also market their weaponry as "battle-tested" on Palestinians, as they are first developed during attacks on Gaza.

Commenting on both actions, a Palestine Action spokesperson said:

"Palestine Action is committed to the liberation of the Palestinian people. As part of our commitment, it is crucial to disable the operations of Elbit Systems, which involves targeting all those who profit from and enable the Israeli weapons maker. Our actions will cease against JP Morgan and Edwards Accountants once they end their ties to Elbit Systems."

ENDS

NOTES TO EDITORS

If you would like any further information on Palestine action, please contact media@palestineaction.org

Palestine Action is a direct-action network of groups and individuals formed with the mandate of taking action against the sites of Elbit Systems and other companies complicit in Israeli apartheid, calling for all such sites to be shut down.

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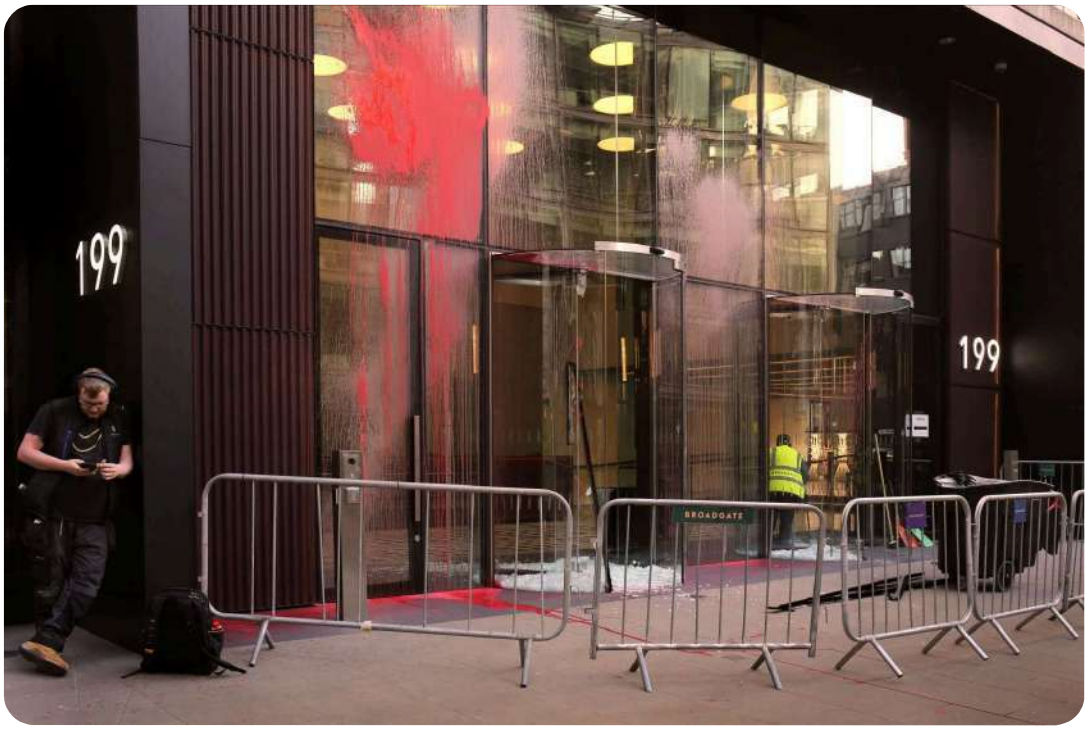
IMPORTANT LINKS

FIVE ALLIANZ BRANCHES STRUCK NATIONWIDE: DROP ELBIT SYSTEMS!

Apr 18, 2025



Images are available and free to use, with the relevant credit

Overnight, activists have struck at five branches of insurance giant Allianz, using disruptive acts of direct action seeking to bring an end to their business relationship with Elbit Systems, Israel's largest arms firm. In Glasgow, Croydon, Chelmsford, Datchet and Bishopsgate, Allianz premises have had their windows smashed, been been coated in blood-red paint, and daubed in the message 'Drop Elbit'.

As their clients' weapons are currently being used for genocide in Gaza [1], where thousands have been killed over the past month and hundreds of thousands are being starved, 'Allianz Insurance Products Trust' continues to provide Employers Liability Insurance to 'Elbit Systems UK'. Without this insurance, Elbit could not operate in Britain, and could not manufacture the litany of weapons products which they export for military end use by Israel [2]. Allianz meanwhile remains a major institutional investor in Elbit [3], doubly profiting from their business of mass-slaughter in Palestine.

The campaign against Allianz was launched in October 2024, when 10 Allianz branches in Britain were hit [4], followed up with a co-ordinated wave of actions in January 2025 at 15 sites across Europe [5]. In the past week alone, actions at Allianz have struck at their branches in Rotterdam [6] and Berlin [7], and activists have occupied their offices in Bristol [8] and, last month, in London [9] to force them closed.

A Palestine Action spokesperson has stated:
"Allianz continues to provide services to Elbit, continues to hold Elbit shares is clear, because the genocide in Gaza remains profitable. Today's actions and the campaign against Elbit is correcting from the externalities of Elbit's business of slaughter. Actions will continue until Allianz drops Elbit as a clien

ENDS

NOTES TO EDITORS

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Palestine Action is a direct-action network of groups and individuals formed with the mandate of taking action against the sites of Elbit Systems and other companies complicit in Israeli apartheid, calling for all such sites to be shut down.

[1] https://www.whoprofits.org/companies/company/3794
[2] https://caat.org.uk/data/companies/elbit-systems/
[3] https://fintel.io/so/us/eslt
[4] https://freedomnews.org.uk/2024/10/08/activists-target-ten-allianz-offices-over-elbit-links/
[5] https://palestineaction.org/europe-allianz/
[6] https://x.com/Pal_action/status/1911740498634506546
[7] https://x.com/Pal_action/status/1912880933138477523
[8] https://www.bristol247.com/news-and-features/news/police-remove-palestine-action-protesters-building/
[9] https://realmedia.press/palestine-action-allianz/

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PALESTINE ACTION OCCUPY ELBIT'S MILITARY ELECTRONICS SUPPLIER

Apr 16, 2025

Videos available are free to use, with relevant credit

In the early hours of this morning, 15th April 2025, two activists from Palestine Action successfully evaded security, to occupy the roof of 'GRiD Defence Systems' at Holtspur Lane, High Wycombe. The military hardware firm is a key supplier to Elbit Systems, Israel's biggest weapons maker, manufacturing a range of military computers and processors, as well as other military electronics.

In addition to supplying Elbit, GRiD provide key components to other arms manufacturers who have been up to their necks in the Gaza Genocide, including Lockheed Martin. manufacturers of F-35 'fighter' jets, Leonardo, who produce Apache attack helicopters, and Instro Precision who make weapons sights, target acquisition systems, and electronic optics systems for the Israeli military.

Palestine Action last visited GRiD in June 2024, with 4 activists barricading themselves inside the plant, and destroying military hardware found there. At the time, a Palestine Action spokesperson warned: "GRiD is just one of the companies we know to be supplying Elbit. From intel gleaned from actions, to information passed on by whistleblowers – we know who you are, and any firm doing business which enables genocide should not be surprised when they too are shut down."

The aim of Palestine Action, in stopping production at GRiD, is to intervene in the genocidal supply chain, which allows British companies to manufacture weapons, in whole or in part, which are then used to devastating effect against the civilian population of Gaza.

A spokesperson for Palestine Action said: "Since our previous occupation of the GRiD Defence Systems site, Gaza has been reduced to rubble, its entire infrastructure laid waste, and the population systematically massacred. Israel threatens the very existence of the Palestinian people, in Palestine, and

while they commit war-crime after war-crime, Keir Starmer, and his corrupt and morally-bankrupt front bench, say nothing.

In marked contrast, there are still people in this country willing to put their liberty on the line to take direct action against Israel's military supply chain and uphold international law. We are on the right side of history."

ENDS

NOTES TO EDITORS

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IN LEICESTER & BRISTOL: PALESTINE ACTION STRIKE ELBIT & ITS FACILITATORS

Apr 14, 2025

In a co-ordinated pair of actions striking at the operations in Britain of Israel's largest weapons company, Palestine Action have shut down operations at Elbit Systems' Leicester drone factory [1] and are occupying Elbit's Bristol insurers [2].

Returning to the Leicester site once again after years of occupations, blockades, and disruption [3, 4, 5, 6], activists have today delivered a truckload of manure to the factory gates. The pile of excrement is serving to blockade the site, halting operations as all access is prevented. The 'UAV Tactical Systems' (U-TacS) plant, which is a major exporter of military drones to Israel [7], has thus been forced shut. The use of manure comes weeks after a similar stunt forced the closure of Elbit's Bristol headquarters [8].

Two activists have secured and locked themselves inside the vehicle, to elongate the blockade and force the closure of the Israeli drone maker.

In Bristol, three activists are currently occupying the headquarters of Allianz – the insurance and financial giant which is responsible for 'Employers Liability Insurance' for Elbit Systems UK. Without this insurance, Elbit's factories – which export arms en-masse to Israel [9] – could not operate. The campaign so far has seen dozens of Allianz' branches struck with disruptive direct action [10], which seeks to raise the costs of their complicity and make it unprofitable to deal with war criminals.

Elsewhere in Britain, Palestine Action claim responsibility for overnight damage to Aviva's corporate offices at the Observatory building in Manchester. And, in Rotterdam, the Netherlands chapter of the Palestine Action movement damaged and defaced the headquarters of Allianz.

Elbit Systems, Israel's largest weapons manufacturer, produces 85% of Israel's killer drone fleet. Such drones are routinely marketed as "battle-tested" or "combat proven" as they are first tested on the

Palestinian people [11]. Despite previous denials, both export licenses and cargo shipments prove UAV Tactical Systems directly exports it's weaponry to Israel during the current Gaza genocide [12].

A spokesperson for Palestine Action has stated:

"Israel's genocide in Gaza is continuing at full steam – and the acts of resistance in the West with demonstrated success are those which strike at the manufacture of Israel's weapons.

By taking on Elbit, and by taking on those facilitating its criminal enterprise, we continue to stand with the Palestinians and to undo our complicity in their killing."

ENDS

NOTES TO EDITORS

[1] https://www.dropbox.com/scl/fo/cee756zd54vu9ko4kx8yt/AO27gt33s9UEQLNhhRzEODw?rlkey=0ow65fivIskaofhltqh1hzs4b&st=gjmsuqo1&dl=0
[2] https://www.dropbox.com/scl/fo/0uc2iw9bwim892xvzka5s/AFWPRLrIV5aBzfthsSXqMLk?rlkey=rln02geks05wx8z7haspqy2jc&st=8vqdg69b&dl=0
[3] https://www.aljazeera.com/news/2021/5/21/pro-palestine-activists-shut-down-uk-drone-factory
[4] https://www.leicestermercury.co.uk/news/leicester-news/live-updates-leicester-drone-factory-6951487
[5] https://palestineaction.org/elbit-leicester-blockade/
[6] https://www.newsweek.com/drone-factory-stormed-pro-palestinian-protesters-england-1835700
[7] https://caat.org.uk/data/exports-uk/overview?company=Elbit+Systems
[8] https://www.thecanary.co/uk/news/2025/02/25/elbit-palestine-protest-bristol/
[9] https://caat.org.uk/data/exports-uk/licence-list?region=Israel&company=Elbit+Systems
[10] https://www.middleeastmonitor.com/20250129-palestine-activists-protest-against-allianz-over-alleged-ties-to-israeli-defence-firm/

[11] https://www.whoprofits.org/companies/company/3794

[12] https://www.declassifieduk.org/vindicated-how-palestine-action-hit-weapons-factories-exporting-to-israel/

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MULTIPLE OFFICES OF SCOTTISH ENTERPRISE TARGETED BY PALESTINE ACTION

Apr 7, 2025

Images available are free to use, with relevant credit (Videos of Edinburgh and Dundee will be uploaded within the next couple of hours)

Today, 7th April, Palestine Action Scotland and Palestine Action targeted 5 offices of Scottish Enterprise, in Dundee, Glasgow, Edinburgh, Glenrothes, and London.

A spokesperson for the activists said:

'Despite the Scottish Government's "talk" about an arms embargo, they have been using our tax money to fund arms companies profiting from the wholesale bombing of Palestine. Since the Scottish Government's actions boost this genocidal industry, we have decided that all Scottish Enterprise offices will be targeted until they stop giving grants to the weapons manufacturers, Thales and Leonardo. We will take back via property damage every penny Scottish Enterprise uses to fund Palestinian genocide, making them think twice about writing another stimulus cheque to these companies. We will make sure this is not a friendly place for genocidal business growth. Free Palestine.'

Why Scottish Enterprise?

Scottish Enterprise (SE) is a business-granting body of the devolved Scottish Government, funded by Scottish tax revenues. Freedom of Information requests by Amnesty International have revealed that SE has provided £159,125 in grants to Leonardo UK since October 2023 [1], and £9,247,974 to Leonardo UK and Thales UK collectively from 2015 to 2023 [2,3,4,5,6]. SE has yet to have any meaningful discussions about changing its policy on giving grants to defense companies linked to the Israeli genocide. [7]

The Scottish government have claimed that no grants have been given to the manufacture of arms in Scotland, and that the funding awarded by Scottish Enterpris[illegible]ted research, training and apprenticeships' [9]. However, Amnety's 2022 Freedom of Information request to SE details a grant

awarded to Thales for 'support to develop two new and distinct products with application and interest to *defence*' (our emphasis) [3].

Amnesty have revealed that Scottish Enterprise's so-called 'human rights checks' on arms companies do not meaningfully take account of where the products are used [9]. In May 2024, Campaign Against Arms Trade stated: 'each arms company that has received funding from the Scottish government [via SE] are also profiting from, and exporting arms to, countries on the FCO's Human Rights Priority list.' [10]

According to Amnesty: 'Money from Scottish Enterprise could directly or indirectly find its way into the supply chain sending weapons for use in the conflict in Gaza [...] the supply chain of arms is complex, with some companies selling component parts to one country – such as the US – for them to be assembled into planes and sold on to others.' [8]

Scottish Enterprise hide their complicity behind the complexity of arms industry supply chains, and the vague and imprecise technical jargon of their grants remits, to deflect legitimate criticism as misinformed, and launder their funding of the arms industry as innocent.

Why Leonardo?

Leonardo UK makes laser targeting systems for F-35 jets, which have been used extensively in Gaza by Israel [11]. Leonardo have stated: "Our Edinburgh site is home to our world-leading laser capability, with our engineers meeting around 80% of the global demand for high-energy military lasers. The targeting laser on the new F-35 stealth fighter is one of the applications developed by our UK engineering team.' [12]

Leonardo also supplies Israel with Aermacchi M-346 aircrafts [11, 13]. As of January 2023, Leonardo acquired Israeli defence company RADA Electronic Industries, manufacturer of tactical radar equipment [14].

Why Thales?

Thales UK is closely linked to Israel's biggest weapons maker Elbit Systems, with whom they produce the Watchkeeper drone [15], modelled on Elbit's infamous Hermes 450 drone, advertised as 'battle-tested on Palestinians' [16]. Thales also partners with Elbit under their joint venture 'UAV Tactical Sytems' which operates in a factory the companies co-own in Leicester. This site is used for the export of equipment for military drones to Israel [23].

Why Now?

The Scottish Government pretends to differentiate itself from Westminster asking them to cease supplying arms to Israel whilst implying that its own hands are tied [22]. This is a disingenuous way to deflect from their multimillion pound funding of the zionist genocide, and to divert protest activity away from their own doorstep, where it can be effective, towards a more distant, more nebulous target.

Palestine Action Scotland intend to starve the logistical, financial and political ecosystem that supports Leonardo and Thales in Scotland in order to force them to shut their sites. The direct action of property damage to Scottish Enterprise's sites is a strategy to make the so-called 'economic gains' of expanding in Scotland not worth the costs.

NOTES TO EDITORS

1. Palestine Action is a direct-action network of groups and individuals formed with the mandate of taking action against the sites of companies complicit in Israeli apartheid, calling for all such sites to be shut down. If you would like further information on Palestine Action, please contact media@palestineaction.org.

2. Photographs of the action against Scottish Enterprise are provided with this release.

3. Footnotes:

https://www.amnesty.org.uk/press-releases/scotland-scottish-government-must-review-due-diligence-grants-arms-companies

[1]https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://www.scottish-enterprise.com/media/svwpjus1/final-report-se-expenditure-over-25k-23-24-26-08-24.xlsx&ved=2ahUKEwiey9vOm7eMAxWuGhAIHbX3DOIQFnoECBUQAQ&usg=AOvVaw2CWChULBXbbQaiiNNJ-jv2

[2] https://www.scottish-enterprise.com/our-organisation/accessing-our-information/freedom-of-information/freedom-of-information-releases/defence-awards

[3] https://www.scottish-enterprise.com/our-organisation/accessing-our-information/freedom-of-information/freedom-of-information-releases/funding-given-to-defence-aerospace-and-marine-firms-in-202122

[4] https://www.scottish-enterprise.com/media/iinbjuml/se-items-of-expenditure-over-25k-21-22.pdf

[5] https://www.scottish-enterprise.com/media/athfjjma/copy-of-final-report-se-expenditure-over-25k-22-23-09-04-24.pdf

[6] https://www.scottish-enterprise.com/media/wdelzgwd/foi-4854-appendix-a-pdf-100kb.pdf

[7] https://theferret.scot/scottish-government-grants-arms-firms-israel/

[8] https://www.bbc.com/news/articles/c2389px8x8eo

[9] https://www.heraldscotland.com/news/24273964.2m-scots-public-grants-given-arms-firms-supplying-israel/

[10] https://caat.org.uk/take-action/campaign-with-us/stop-funding-repression/

[11] https://theaviationist.com/2015/04/27/we-flew-the-itaf-m-346/

[12] https://uk.leonardo.com › en › about › uk-locations › edinburgh

[13] https://theaviationist.com/2024/08/08/leonardo-m-346-20-years/

[14] https://www.calcalistech.com/ctechnews/article/hylgfbyqq

[15] https://www.army-technology.com/projects/watchkeeper/?cf-view

[16] https://electronicintifada.net › blogs › asa-winstanley › britain-ditches-israeli-drones

[19] https://www.aljazeera.com/news/2025/3/18/why-did-israel-break-the-ceasefire-in-gaza

[20] https://caat.org.uk/data/exports-uk/licence-list?index=date&region=Israel&company=Elbit+Systems

[21] https://www.amnesty.org.uk/press-releases/uk-mps-urged-support-calls-immediate-halt-uk-arms-sales-israel

[22] https://www.independent.co.uk/news/uk/humza-yousaf-israel-prime-minister-scottish-first-minister-b2522879.html

[23] https://caat.org.uk/data/exports-uk/overview?region=Israel&company=Elbit+Systems

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PALESTINE ACTION OCCUPY ROOFTOP OF ELBIT SUPPLIER, DEAN GROUP IN MANCHESTER

Mar 31, 2025

Images and videos are available for free, with relevant credit

Manchester, Britain – 31st March 2025 – In a bold act of direct action, activists from Palestine Action are occupying the rooftop of the Dean Group facility in Irlam, Manchester, this morning. They've already smashed windows, solar panels and covered the premises in blood-red paint, symbolising the company's involvement in spilling Palestinian blood.

The action follows one on the 22nd July 2024 in which activists entered the same Dean Group premises, dismantling machinery [1] to prevent its collaboration with Israel's war machine. Dean Group remains a critical partner to the production of sniper sights at Elbit Systems' Instro Precision facility in Kent.

Elbit Systems, Israel's larges weapons firm, relies upon Dean Group for its "investment casted" metals components, including for the Kent 'Instro Precision' factory which is the major exporter of weapons sights and targeting equipment arms to Israel from Britain [2]. Dean Group materials have been identified during previous Palestine Action occupations of Instro Precision [3] – occupations undertaken, like this one, to break the supply chains of murderous arms from Britain to Israel. The brutalisation of Gaza, and the occupation of Palestine, are made possible through Elbit's array of military technologies [4].

As Dean Group say on their website, "So much from a military standpoint requires investment casting, including weapons, missiles, radar, and communications equipment" [5].

Palestine Action spokesperson said:
"*Today, we are once again taking direct action against the Dean Group. Their role in supplying critical components to the Israeli military means they are directly involved in the oppression and killing of Palestinians. As long as these companies enable the production of weapons which are "tested" on*

Palestinians, we will continue to take action to disrupt their operations. The Dean Group is a key link in Israel's military supply chain, and actions will continue until their collaboration ceases."

This occupation forms part of a growing wave of direct action targeting companies and institutions that enable Israel's military-industrial complex. Palestine Action's campaign aims to create an economic blockade on Israel's military suppliers, ensuring that their profits are disrupted and their facilities face continuous resistance.

ENDS

NOTES TO EDITORS

For media inquiries, please contact Palestine Action at media@palestineaction.org

[1] https://morningstaronline.co.uk/article/palestine-supporters-raid-companies-supplying-weapons-israel

[2] https://caat.org.uk/data/exports-uk/licence-list?region=Israel&company=Elbit+Systems

[3] freedomnews.org.uk/2024/06/17/palestine-action-targets-kent-arms-factory-and-scotiabank-offices-in-london/

[4] https://visualizingpalestine.org/visual/field-tested-elbit-systems-2024-update/

[5] https://www.deangroup-int.co.uk/markets/defence-castings/

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PALESTINE ACTION TARGET KEYSIGHT IN EDINBURGH AND ALLIANZ IN GLASGOW

Mar 21, 2025

Images available are free to use, with relevant credit

Following on from Palestine Action's successful action against Edinburgh's Leonardo weapons plant yesterday, there were 2 more actions in Scotland early today.

Overnight, Palestine Action made a return visit to Keysight Technologies at Lochside Place, Edinburgh, breaking windows, and covering the premises in symbolic blood-red paint. The Glasgow offices of Allianz Insurance, on Waterloo Street, were also redecorated with blood-red paint, with the words, "AZ drop Elbit, it's genocide" painted on the building.

Keysight Technologies, whose sites across England and Scotland, have previously been targeted by Palestine Action, provide electronic components to UAV Tactical Systems for use in the killer drones they manufacture at their Leicestershire plant. Keysight also export military electronics direct to Israel. UAV Tactical is owned by Elbit, Israel's biggest weapons maker, who produce more than 85% of Israel's killer drone fleet, with engines for the Hermes 450 and Harop and Harpy attack drones being manufactured at UAV's Shenstone factory.

Allianz provide the insurance without which Elbit could no longer manufacture Israeli weapons in Britain. They have been targeted again and again by Palestine Action, with 15 sites being hit across Europe, on the same night, in January, and dozens of actions before and since then.

A spokesperson for Palestine Action said:

"With Israel having abandoned all pretence to maintain the rules of the agreed 'ceasefire', and respect for international law, returning to its relentless bombing of the Palestinian population of Gaza, it is more important than ever to stop the manufacture and supply of th ns being used to murder Palestinians. Britain is complicit in the slaughter, with Keir Starmer's government, aiding and abetting

the Israeli military, and covering for the war criminals in power there, politically. So long as Israeli weapons are manufactured in Britain, we will continue to target the companies producing them, and every firm who assists them in doing so."

ENDS

NOTES TO EDITORS

If you would like any further information on Palestine action, please contact media@palestineaction.org

Palestine Action is a direct-action network of groups and individuals formed with the mandate of taking direct action against Elbit Systems' UK locations at grassroots level, calling for them all to be shut down and for the British government to end its complicity in Israeli apartheid.

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CONTACT

Join Palestine Action
join@palestineaction.org

Contact Support
legalsupport@palestineaction.org

Write to Palestine Action Prisoners
palactprisoners@protonmail.com

General Enquiries
info@palestineaction.org

PALESTINE ACTION USE CHERRY PICKER TO DAMAGE ELBIT SYSTEMS HQ IN BRISTOL

Mar 15, 2025

Images available are free to use, with relevant credit

This morning, Palestine Action returned to shut down Elbit Systems' Bristol headquarters for the 17th time, using a modified cherry picker to damage the operational hub of Israel's largest arms firm.

To halt operations, stopping the Aztec West site's contributions to genocide in Palestine, an activist has locked-on inside the vehicle of the cherry picker, whilst others from inside the bucket have begun dismantling the factory. They have sprayed red paint across the building and from their high vantage point, they're swinging a sledgehammer on rope to smash the windows of the weapons site.

The Bristol site is Elbit's main operational hub in Britain, overseeing the activities and exporting of all 'Elbit Systems UK' subsidiaries. Recently published arms export license data show that 'Elbit Systems UK' received one quarter of all the arms export licenses for Israel granted by Starmer's government [2]. Since the commencement of the Gaza genocide in October 2023, it has in total been granted at least 24 licenses for exports to Israel, and has made dozens of military cargo shipments [3]

According to Israeli media, Elbit provides up to 80% of the Israeli military's land based equipment [3] and 85% of its killer drones [4], supplying huge numbers of munitions and missiles including the 'Iron Sting', which was first deployed in the Gaza Genocide [5]. Elbit famously advertises its weapons as having been "battle-tested" – against Palestinians.

Palestine Action first shut down Aztec West site on the 13th April 2021 with a rooftop occupation. Since then it has been relentlessly targetted in high-profile actions [6, 7] with the clear aim of ending the British manufacture of weapons used in the genocide and occupation of Palestine. In the past week, Palestine Action has struck numerous times at Elbit's insurers Allianz [8, 9] and Aviva [10], and have rejected calls for ethnic cleansing by Donald Trump by wrecking his Ayrshire golf resort: 'GAZA IS NOT FOR SALE' [11]

A spokesperson for Palestine Action said:

"While Elbit weaponry is used for massacres in Gaza and the West Bank, twenty Palestine Action members, including the Filton18, are imprisoned without trial. Elbit, Starmer, and those facilitating war crimes are the criminals – not those taking action to stop the slaughter in Palestine.

Activists are shutting down Elbit Bristol, making clear that we will not back down against a company whose sole purpose is to profit from the destruction of Palestinian life."

ENDS

NOTES TO EDITORS

If you would like any further information on Palestine action, please contact media@palestineaction.org

Palestine Action is a direct-action network of groups and individuals formed with the mandate of taking action against the sites of Elbit Systems and other companies complicit in Israeli apartheid, calling for all such sites to be shut down.

[1] https://www.thecanary.co/uk/news/2025/02/25/elbit-palestine-protest-bristol/
[2] https://caat.org.uk/data/exports-uk/overview?region=Israel&date_from=2024-07
[3] https://www.declassifieduk.org/vindicated-how-palestine-action-hit-weapons-factories-exporting-to-israel/
[3] https://www.haaretz.com/israel-news/business/2018-03-12/ty-article/elbit-systems-to-buy-imi-in-major-israeli-defense-merger/0000017f-ef5d-df98-a5ff-effdd2fd0000
[4] https://corporatewatch.org/elbit-systems-company-profile-2/#sdendnote2sym
[5] https://www.aljazeera.com/features/2023/11/17/israels-weapons-industry-is-the-gaza-war-its-latest-test-lab
[6] https://www.dazeddigital.com/politics/article/54688/1/palestine-action-on-shutting-down-an-israeli-arms-company-elbit-bristol-hq
[7] https://palestineaction.org/bristol-nakba/
[8] www.instagram.com%2Flowkeyonline%2Fp%2FDHB7KvGIGJC%2F%3Fhl%3Dbg&is_from_rle
[9] https://palestineaction.org/allianz-city/
[10] https://morningstaronline.co.uk/article/palestine-action-occupies-entrance-avivas-manchester-office-over-ties-israeli-weapons-manufacturer
[11] https://palestineaction.org/trump-golf/

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Israeli army starts calling up reservists for planned expansion to Gaza offensive

GETTY IMAGES

Hugo Bachega
Middle East correspondent

Emily McGarvey
BBC News

Reporting from
Jerusalem

4 May 2025
Updated 5 May 2025

The Israeli military has begun calling up tens of thousands of reservists to "intensify and expand" its operations in Gaza.

The Israel Defense Forces (IDF) said it was "increasing the pressure" with the aim of returning hostages held in Gaza and defeating Hamas militants.

Critics say the recent military offensive, after a ceasefire broke down, has failed to guarantee the release of captives, and question Prime Minister Benjamin Netanyahu's objectives in the conflict.

Under the plan, the military said it would operate in new areas and "destroy all infrastructure" above and below ground.

Israeli media report that the Israeli security cabinet has approved the renewed military expansion in Gaza.

But reports suggest it will not happen until after President Donald Trump's trip to the region next week.

International negotiations have failed to reach a new deal for a ceasefire and the release of the remaining 59 hostages being held by Hamas - 24 of whom are believed to be alive.

No Israeli hostages have been released since Israel resumed its offensive on 18 March after the collapse of a two-month ceasefire with Hamas.

Since then, Israel has seized large areas of Gaza, displacing hundreds of thousands of Gazans again.

Israel has said its aim was to put pressure on Hamas, a strategy that has included a blockade on humanitarian aid that has been in place for more than two months.

Aid agencies, who have reported acute shortages of food, water and medicines, have said this was a policy of starvation that could amount to a war crime, an allegation Israel rejects.

An expanded offensive will put more pressure on exhausted reservists, some of whom have been drafted five or six times since the war started, and renew concerns of the families of hostages, who have urged the government to reach a deal with Hamas, saying this is the only way to save those who are still alive.

The measure will also raise new questions about Netanyahu's real intentions in Gaza.

He has been frequently accused by the hostages' families and opponents of sabotaging negotiations for a deal, and of prolonging the war for political purposes, allegations he denies.

And almost 19 months into the war, he has not presented a day-after plan.

- **Israeli reservists speak out against Gaza war as pressure on Netanyahu grows**
- **UN's top court begins hearings on Israel's legal duties towards Palestinians**
- **Qatar claims slight progress towards ceasefire in Gaza**

The military presented Netanyahu with its planned staged offensive in Gaza on Friday, according to local media.

In recent weeks, thousands of reservists have signed letters demanding Netanyahu's government stop the fighting and concentrate on reaching a deal to bring back the hostages.

On Saturday evening, there were fresh protests across Israel calling for an end to the conflict.

In Tel Aviv, the mother of a hostage who remains in captivity called it a "needless war".

The Israeli military said on Sunday that two more Israeli soldiers had been killed in Gaza.

Earlier on Sunday, a missile fired from Yemen by Iran-backed Houthi fighters **landed near the main terminal of Israel's Ben Gurion airport**. Netanyahu has vowed to retaliate.

The Houthis later responded to Israel's new plans for Gaza, saying they would impose an "aerial blockade" on Israel by repeatedly targeting its airports.

In Gaza, the Hamas-run health ministry said as of 11:05 local time (09:05 BST) on Sunday, 40 people had been killed in the previous 24 hours, and a further 125 injured.

The Israeli military launched a campaign to destroy Hamas in response to an unprecedented cross-border attack on 7 October 2023, in which about 1,200 people were killed and 251 others were taken hostage.

At least 52,535 Palestinians have been killed in Gaza during the ensuing war, according to the territory's Hamas-run health ministry.

Of those, 2,436 have been killed since 18 March, when Israel restarted its offensive in the Gaza Strip, the ministry said.

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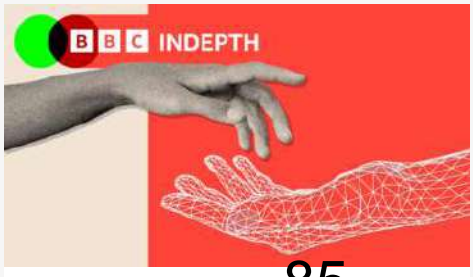

Can AI therapists really be an alternative to human help?

85

Justice for Gaza: Legal Fund for Action Against War Machine

Amareen Afzal is organising this fundraiser.

Donation protected

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

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

I need your support to cover the legal fees for this case. Any support is really welcome and appreciated!

Show your support for this GoFundMe

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Organiser

Amareen Afzal
Organiser
England

Contact

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Please donate to share words of support.

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£3,127 raised

£3,050 target · 125 donations

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Reefa Dixon
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Anonymous
£50 · 4 mos

Laura Freeman
£10 · 5 mos

Sheik Meeran
£25 · 6 mos

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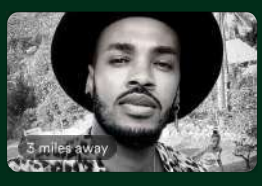

Gregory 'London' Mannings
by David for Funerals & Memorials
£2,590 raised

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by David for Community
£3,107 raised

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Urgent Help For The Reyes Viera Family
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£9,003 raised

IN THE HIGH COURT OF JUSTICE **Claim No. KB-2024-004175**
KING'S BENCH DIVISION

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

FIFTH 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 pursuant to paragraph 9 of the Order of Tipples J dated 24 January 2025, and paragraph 9 of the Order of Murray J dated 21 March 2025, both of which require Teledyne UK to file and serve any further evidence upon which it will rely at the final hearing of the Claim against the Named Defendants and at the review of the Order against Persons Unknown by 29 May 2025.

3. The facts and matters set out by me in this witness statement are either known by me directly and are true, or are known by me indirectly and are believed to the best of my knowledge to be true. In relation to matters falling into the latter category, I have set out the source of my knowledge and belief.

4. I exhibit to this witness statement a bundle of documents marked **MS5**. All references to that exhibit are in the format **MS5/page number.**

10 March 2025

5. Mr Wargent, in his fourth witness statement, makes reference to an incident that occurred at my firm's offices located at 48 Chancery Lane, London on 10 March 2025. I shall here give further details of that incident.

6. In the early hours of Monday 10 March 2025, my firm's offices were targeted and vandalised as a result of its role in this Claim.

7. My firm's offices have a ground floor reception area that fronts onto Chancery Lane, which is accessed by a single-width glass door. There is also a large floor to ceiling window next to the door (on the right-hand side, if approaching from the street). The reception area is manned during working hours. Outside of working hours, access to the building can only be obtained by key card access, such that it is not possible for someone without pre-authorisation access to enter the building.

8. I understand from my firm's Office and Administration Manager that at approximately 2:19am four unidentified persons attended my firm's offices on what appeared to be hire bicycles (such as a Lime Bike or similar). These people were wearing hoods, baseball caps, bike helmets and face masks, and it has not been possible to identify them from the CCTV images obtained. These people were not able to access the building given the security arrangement that I have described above.

9. The four persons then proceeded to smash a hole in the large window next to the door, also causing the glass to shatter and crack. I understand that the review of the CCTV footage shows that the nozzle of a re-purposed fire extinguisher was then inserted to the hole, and red paint was sprayed all over the inside of the reception area. The outside of the building, including windows, window frames and brickwork were also sprayed with red paint from a fire extinguisher. On the pavement outside the building, the words "DROP TELEDYNE" were stencilled in red paint.

10. The four persons then made off on the same bicycles that they arrived on. I understand that the attack took only some 41 seconds.

11. I exhibit at **MS5/1-6** six photographs of the damage caused in the attack.

12. I exhibit at **MS5/7-10** a selection of still CCTV images showing the attack in progress. Unfortunately, as it was dark, the footage is of a reduced quality. The still image at **MS5/10** shows that the out of hours security guard was present in the reception area when the attack started; I understand that she left the reception area quickly, as the paint was being sprayed inside the building. The incident was likely to have been very distressing for her.

13. I note that the use of red paint and re-purposed fire extinguishers, as well as face coverings, is consistent with the usual modus operandi of supporters of Palestine Action, and is consistent with the type of actions encouraged in the so-called Underground Manual, with which the Court has been provided.

14. On 10 March 2025, a post appeared on the Palestine Action Instagram account. I exhibit that post at **MS5/11-14**. The post contained five photographs of my firm's offices, taken in the hours of darkness (presumably by one or more of the four unidentified persons), which showed the damage that had been caused by the incident. The text accompanying the post read:

> *An anonymous submission shows action taken against the London office of Keystone Law, commercial lawyers for American weapons companies arming Israel*

15. The post suggests that the attack was not co-ordinated by Palestine Action itself, but it is notable that the perpetrators followed the guidance in the so-called Underground Manual and carried out such an action and submitted the photographs to Palestine Action for publication.

16. The persons responsible for the attack remain unidentified.

10/11 May 2025

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

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

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

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

21. The poster also reads:

    WANTED

    FOR COMPLICITY IN WAR CRIMES & GENOCIDE

    IF SEEN PLEASE REPORT TO THE ICJ

    KEYSTONE LAW PROVIDE LEGAL SERVICES FOR TELEDYNE WEAPONS

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

15 May 2025

23. Mr Wargent, in his fourth witness statement, also makes reference to an incident that occurred at King's College London. I shall here give further details of that incident.

24. On Thursday 15 May 2025, I received an email from a student at Kings College London informing me that, when leaving the library the day before, they had seen what they described as "*a rather intimidatory poster about you*". A photograph of the poster was enclosed with the email, and it is the same poster described above that was attached to the coffee shop.

The poster campaign

25. On a personal level, it is bemusing to see my face and name on a poster accusing me of being complicit in war crimes and genocide. To the extent I need to deny such accusations, I can confirm that I am not complicit in war crimes and genocide and to wantonly accuse a legal professional of such matters purely as a reaction to them performing their legal role is, if nothing else, an appalling trivialisation of the suffering of those that experience such acts (people that groups like Palestine Action claim to be acting in the name of).

26. On a professional level, I find it deplorable and outrageous that any legal (or indeed other) professional should be subject to threats and attempted intimidation for simply doing their job – my only "*crime*" has been to represent a client of my firm in this matter and to obtain an injunction aimed at preventing trespass, criminal damage and access to their private property.

27. The deep irony of being accused of crimes by anonymous individuals who have in the past celebrated criminal damage and disruption to lawfully operating businesses and educational institutions in this jurisdiction (and who continue to encourage others to commit such crimes while themselves hiding in the shadows) is not lost on me.

28. While robust political debate and peaceful protests are vital elements of democratic society, the individual targeting and harassment of legal professionals simply for

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

West Yorkshire Police

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

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

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

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

D19 Mary Ensell

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

Statement of Truth

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

…….
Manan Singh
Dated this 27 day of May 2025

IN THE HIGH COURT OF JUSTICE **Claim No. KB-2024-004175**
KING'S BENCH DIVISION

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

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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

EXHIBIT MS5

This is Exhibit MS5 referred to in the Fifth Witness Statement of Manan Singh.

CHANCERY LANE
L48
L48

EARTH
ROD
DROP
TELEDYNE

KEYSTONE LAW

CHANCERY LANE
48
PULL

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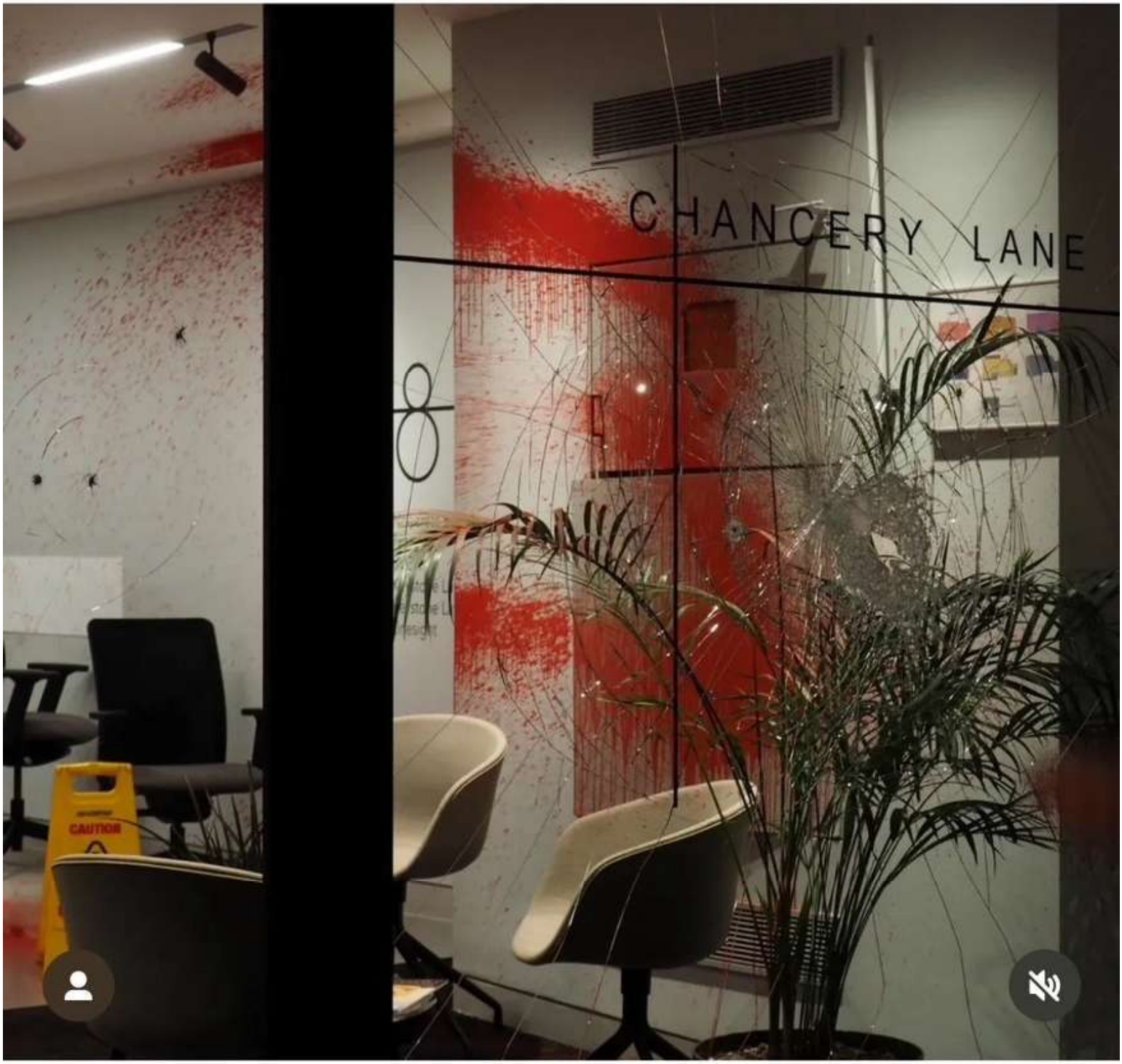
Camera 03

03-10-2025 Mon 02:19:26 (W)
Camera 03

03-10-2025 Mon 02:19:29 (W)
Camera 03

03-10-2025 Mon 02:19:51 (W)
Camera 01

pal_action and 2 others
London, United Kingdom



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pal_action BREAKING: An anonymous submission shows an action taken against the London office of Keystone Law, commercial lawyers for American weapons companies arming Israel.

1 day ago

pal_action and 2 others
♫ 47SOUL · Hold Your Ground (feat. Lowkey)

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pal_action BREAKING: An anonymous submission shows an action taken against the London office of Keystone Law, commercial lawyers for American weapons companies arming Israel.

1 day ago

pal_action and **2 others**
London, United Kingdom
♫ 47SOUL · Hold Your Ground (feat. Lowkey)

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pal_action BREAKING: An anonymous submission shows an action taken against the London office of Keystone Law, commercial lawyers for American weapons companies arming Israel.

1 day ago

pal_action and 2 others
London, United Kingdom

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pal_action BREAKING: An anonymous submission shows an action taken against the London office of Keystone Law, commercial lawyers for American weapons companies arming Israel.

1 day ago

WANTED
MANAN SINGH
PARTNER, KEYSTONE LAW
FOR COMPLICITY IN
WAR CRIMES & GENOCIDE
IF SEEN PLEASE REPORT TO THE ICJ
KEYSTONE LAW PROVIDE
LEGAL SERVICES FOR
TELEDYNE WEAPONS
PALESTINE
ACTION

BLACK SHEEP COFFEE
WANTED
WANTED
WANTED

IN THE HIGH COURT OF JUSTICE **Claim No. KB-2024-004175**
KING'S BENCH DIVISION

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 ae 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 Bize 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 organised, 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 in 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 overlayed 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]*hilst 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.

M Singh

…….
Manan Singh
Dated this 21 day of July 2025

IN THE HIGH COURT OF JUSTICE **Claim No. KB-2024-004175**
KING'S BENCH DIVISION

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

EXHIBIT MS7

This is Exhibit MS7 referred to in the Seventh Witness Statement of Manan Singh.

PALESTINE ACTION TARGET THE LONDON-BASED LANDLORDS OF KENT'S ISRAELI WEAPONS FACTORY

May 29, 2025

Images are available for free, with the relevant credit

During the early hours of Thursday 29th May, activists from Palestine Action targeted the London-based landlords of 'Discovery Park' business park which Elbit's Instro Precision weapons factory is situated in. The registered address of Discovery Park Ltd was covered in red paint and the front windows were shattered, to demonstrate against the company's involvement in arming the Gaza genocide.

Instro Precision is a weapons maker owned by Elbit Systems, Israel's biggest weapons producer. The factory, which produces targeting gear for the Israeli military to commit genocide, is based in and leased by Discovery Park Ltd.

In 2024, according to recent FOI disclosures, Instro Precision was granted over a dozen weapons export licenses for the shipment of arms to Israel. Most of the goods exported to Israel by Instro fall under category 'ML5b' (target acquisition and related systems). Instro's products include SpectroXR imaging systems for Israel's *Skylark* drones, while Elbit has boasted that thousands of the 'XACT' weapons sights systems manufactured by Instro have been delivered to the Israeli military and are most likely used to massacre Palestinians.

Palestine Action's direct action campaign involves targeting all those who facilitate, enable and profit from the operations of Israel's biggest weapons producer. This includes landlords, recruiters, investors, suppliers, lobby firms, logistics firms and more. As a result, over a dozen companies have cut ties with Elbit to date.

A Palestine Action spokesperson said:

"Discovery Park Ltd are the landlords of a Kent-based Israeli weapons factory which is exporting targeting gear for the Israeli military to commit genocide in Gaza. As part of our commitment to the Palestinian people, we will not allow companies on our doorstep to profit from mass murder. Discovery Park must evict Elbit, or expect Palestine Action."

ENDS

NOTES TO EDITORS

If you would like any further information on Palestine action, please contact media@palestineaction.org

Palestine Action is a direct-action network of groups and individuals formed with the mandate of taking action against the sites of Elbit Systems and other companies complicit in Israeli apartheid, calling for all such sites to be shut down.

SIGN UP FOR UPDATES

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Help grow the movement against the Israeli weapons industry

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PALESTINE ACTION TARGET TECH SUPPLIERS FOR THE ISRAELI WEAPONS TRADE

Jun 1, 2025

Images are available for free, with credit to Milo Chandler

Activists from Palestine Action targeted CDW, tech suppliers for Israel's biggest weapons manufacturer, Elbit Systems, in an anonymous, covert action at their Peterborough premises today. Glass panels were cracked and the building was covered in red paint, symbolising the bloodshed of the Palestinian people. This is not the first time Palestine Action has targeted the firm, having previously hit their London, Manchester and Peterborough offices. The action comes as part of Palestine Action's continued commitment to targeting the supply chains used by Elbit Systems.

CDW provide supply chain management, IT solutions, cyber security and eProcurement services for the Israeli weapons maker, making Elbit's deadly business more efficient. This action highlights the company's role in the genocide of the Palestinian people and urges CDW to end its ties with Elbit.

Since October 7th, over 54,000 Palestinians have been killed, more than 123,000 injured and the majority of the people in Gaza are now displaced and still subjected to brutal bombardment. Elbit Systems supply the majority of Israel's military drone fleet, land based equipment, bullets, munitions and missiles. Their weaponry is often marketed as "battle-tested", after it's deployed and experimented on the people of Gaza and before it's sold on to other regimes across the world. The genocide of Gaza would not be possible without Elbit's weaponry and those who facilitate and profit fro[illegible] deadly business.

A Palestine Action spokesperson said:

“Palestine Action continues to target all those who enable the operations of Israel’s biggest weapons producer, Elbit Systems.

When companies fail to abide by any moral compass and maintain their involvement in genocide, we will intervene and cost them more than they gain by working with Elbit. As a result of our direct action movement, over a dozen companies have cut ties with Elbit to date. CDW must also follow suit.”

ENDS

NOTES TO EDITORS

If you would like any further information on Palestine action, please contact media@palestineaction.org

Palestine Action is a direct-action network of groups and individuals formed with the mandate of taking direct action against Elbit Systems’ UK locations at grassroots level, calling for them all to be shut down and for the British government to end its complicity in Israeli apartheid.

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PALESTINE ACTION RAID DURHAM GENOCIDE SUPPLIER PERMOID INDUSTRIES

Jun 14, 2025

Images available are free to use, with relevant credit

Under cover of darkness, a Palestine Action team cut through fences and broke into Permoid Industries of Newton Aycliffe near Durham, entering the factory to destroy machinery, weaponry and remove private documents.

Since the start of the Gaza Genocide in October 2023, Permoid have shipped more than a thousand munitions containers to the Israeli arms industry, at least 920 of which went to Israel's biggest weapons maker, Elbit Systems, in Ramat Hasharon near Tel Aviv. Permoid produces a wide range of weapons and ammunition containers, suitable for belted heavy machine-gun ammunition, and cartridge, mortar, and shell munitions, including 155mm artillery shells. At the time of the raid by Palestine Action, another shipment was due to be picked up from the factory.

Elbit Systems supplies up to 85% of the Israeli military's killer drone fleet, and land-based military equipment, with numerous weapons factories in Britain. The Ramat Hasharon site produces a range of armaments, including artillery shells, and 155mm and 122mm mortar rounds. Elbit's weapons and ammunition has been central to the Genocide perpetrated by Israel in Gaza.

A Palestine Action spokesperson said: "It is inexcusable to arm the Israeli military and profit from the escalating Gaza genocide. Factories operating on our doorstep who are building the tools needed to destroy Palestine and massacre its people, must know by now that we will directly intervene. If Permoid Industries wants to stay in business and avoid the wrath of Palestine Action, it must cease supplying the Israeli weapons industry."

ENDS

NOTES TO EDITORS

If you would like any further information on Palestine action, p 797 ntact media@palestineaction.org

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Email *

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PALESTINE ACTION RETURN TO PERMOID INDUSTRIES, OCCUPYING THE ROOF AND SHUTTING THE FACTORY DOWN

Jun 16, 2025

Images available are free to use, with relevant credit

Only 48 hours after launching a daring raid on Permoid Industries of Newton Aycliffe near Durham, Palestine Action have returned to occupy the roof of the factory ahead of a planned shipment of ammunition boxes to Israeel.

In the early hours of Saturday morning, a team of Palestine Action activists cut through perimeter fencing and entered the factory, smashing machinery and weaponry, covering it in blood-red paint, and removing confidential documents from the site. The paint was barely dry when Palestine Action were back to refresh it, once more evading security, and this time scaling the roof to unfurl banners exposing Permoid's part in the Gaza Genocide. From the roof, activists today created holes to further damage the inside of the site. The factory has been shut down.

Since October 2023, while Palestinian civilians have been murdered by the thousand, Permoid have been busy making money, assisting the Israeli military, shipping out over a thousand ammunition containers. At least 920 of these containers went to the Ramat Hasharon weapons factory of Elbit Systems, Israel's biggest arms company, with a further 160 containers going to Elbit's 'Advanced Technology Centre' in Haifa.

Permoid manufacture a wide range of weapons and ammunition containers, suitable for everything from grenades and heavy machine-gun ammunition, to mortar and shell munitions, including 155mm artillery shells. Permoid's customer, Elbit Systems, supplies up to 85% of the Israeli military's killer drone fleet, and land-based military equipment, with numerous weapons factories in Britain. The Ramat Hasharon

site, near Haifa, produces a range of armaments, including artillery shells, and 155mm and 122mm mortar rounds. Elbit's weapons and ammunition has been central to the Genocide in Gaza.

A spokesperson for Palestine Action said: "Permoid have been making blood money supplying Israel's biggest weapons firm, during the Gaza Genocide. Now their dirty secret is out, we will target them like any other Genocide-complicit company, something underlined by our return visit today. We advise them to immediately cut their ties to Elbit, and stop assisting in the slaughter of Palestinian civilians. If they continue, we will do everything we can to put them out of business."

ENDS

NOTES TO EDITORS

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Palestine Action is a direct-action network of groups and individuals formed with the mandate of taking direct action against Elbit Systems' UK locations at grassroots level, calling for them all to be shut down and for the British government to end its complicity in Israeli apartheid.

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pal_action • Follow
Bristol

pal_action Front and back entrances to the Bristol head office of Allianz Insurance are completely BLOCKED.

The site is shut down and the demand is clear: Allianz must stop insuring Israel's biggest weapons producer!

2w

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2w 2 likes Reply

wilf.msmsm 🔥🔥🔥
2w 2 likes Reply

revuesinshoes ✊🖤🤍💚❤️🩸
2w 2 likes Reply

jordmcl I've walked passed there loads recently and that floor and building is HABITUALLY RED 😍😂 any time they get an inch of it out, it's covered again. BOSS
2w 26 likes Reply

pitvillagelife All love and respect to you all! 🙏✌️
2w 6 likes Reply

parveens.insta 👏👏👏✊✊✊✊PSPS❤️❤️
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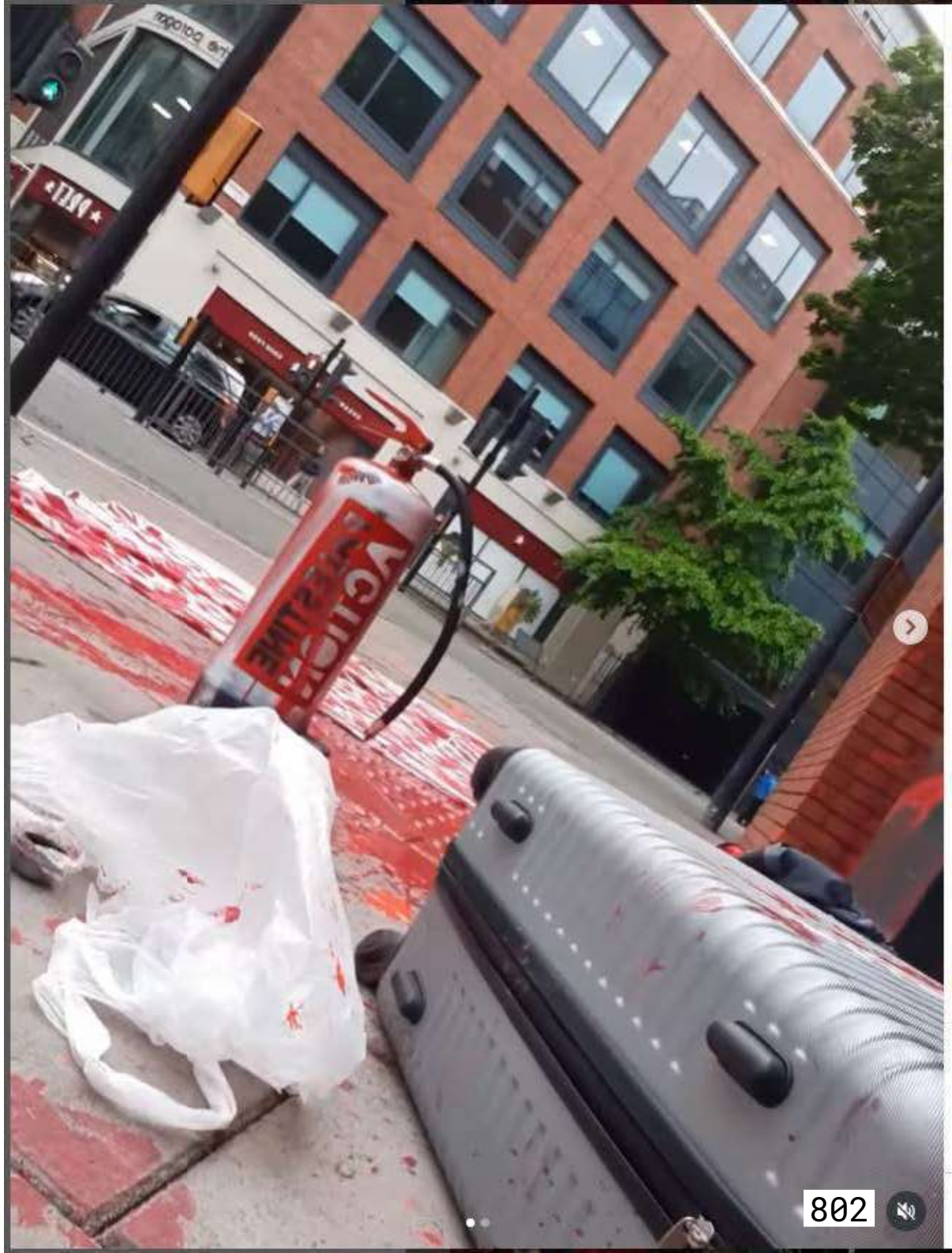
mypunksnotdead ❤️❤️❤️
2w Reply

4,064 likes
June 9

Add a comment... Post



pal_action • Follow
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pal_action Front and back entrances to the Bristol head office of Allianz Insurance are completely BLOCKED.

The site is shut down and the demand is clear: Allianz must stop insuring Israel's biggest weapons producer!

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sulea182 👏👏👏👏👏...
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revuesinshoes 🤎🖤🤍💚❤️🩸
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jordmcl I've walked passed there loads recently and that floor and building is HABITUALLY RED 😍🤩 any time they get an inch of it out, it's covered again. BOSS
2w 26 likes Reply

pitvillagelife All love and respect to you all! 🫶✌️
2w 6 likes Reply

parveens.insta 👏👏👏✊✊✊✊PSPS❤️❤️
2w 2 likes Reply

mypunksnotdead ❤️❤️❤️
2w Reply

4,064 likes
June 9

Add a comment... Post

pal_action • Follow
Original audio

pal_action Palestine Action is surrounding the Bristol head office of Allianz, to ensure the insurance firm stays SHUT.

Allianz invests in, and provides insurance for, Israel's biggest weapons producer, Elbit Systems.

The insurance giant should know after dozens of actions against them: the only way to stop us from showing up on our doorstep is by ending all ties with Elbit!

2w

annejoelleford 😍😍😍😍😍🔥🔥🔥🔥🔥
2w 2 likes Reply

sulea182 👏👏👏👏👏...
2w 2 likes Reply

shannon_galpin 🙌❤️ superheroes every one. Solidarity and respect.
2w 16 likes Reply

faizkarim86 Great respect for your support to Palestine. God bless you all
2w 2 likes Reply

laurafavs_ PS PSPSPSPS❤️❤️❤️
2w 2 likes Reply

asmieteddy Heeeroeeessss 🔥🔥🔥 I put so much respect on you guyyysss

2,112 likes
June 9

803

Add a comment... Post

pal_action • Follow
Original audio

pal_action Whilst the police attempt to remove an actionist blockading Alliamz Insurance, they continue to resist and speak up for Palestine!

Allianz provide insurance for Israel's biggest arms producer, enabling them to build weapons in Britain — so today, we shut it down.

2w

danielle_phoenixrising I love these people 🥹 ✊ PS
2w 151 likes Reply

nomi_vlogs_ Every act of bravery counts ❤️
2w 59 likes Reply

ballaterbboy ❤️ ❤️ PS ✊ ❤️ ❤️
2w 2 likes Reply

parveens.insta Heroes ✊ PS ❤️
2w 7 likes Reply

stanleeeymiller Amazing speaker
1w 4 likes Reply

fi.mil9 Solidarity with this courageous woman taking action to save Palestinian children and their families ❤️ ✊ PS
2w 27 likes Reply

hadeel.bashi ❤️ 👏

7,429 likes
June 9

Add a comment... Post

pal_action • Follow
Original audio

pal_action Arrested for shutting down Allianz, insurers of the Israeli weapons firm fueling the Gaza genocide.

For Palestine, we will put our liberty on the line ❤️

2w

rosarioomoledous 😍

1w 1 like Reply

lilybecketthair 👏

2w 2 likes Reply

doctor.rahmeh Thank you for showing us that humanity exists. In heart and in deed ❤️

2w 23 likes Reply

View replies (1)

hannahxmills ❤️

2w 4 likes Reply

abby.faye.yoga ❤️❤️❤️

2w 4 likes Reply

tari.nazwa 💚💚💚

1w 1 like Reply

whoissu_115 The people united will never be defeated!!! free Palestine!!!!!ps

2w 59 likes Reply

5,037 likes

June 9

805

Add a comment...

Post

pal_action • Follow
Original audio

pal_action Four actionists arrested after they shut down the Bristol head office of Allianz, to demand the firm stops investing in, and providing insurance for, Israel's biggest weapons producer

2w

danielle_phoenixrising Amazing heroes!!!!! ✊ PS

2w 29 likes Reply

barzy42.69 Till the end he was smiling 👏 👏 👏 Free Free Free Palestine PS ❤️

1w 3 likes Reply

chillin4ever333 ❤️ ❤️ ❤️

1w 1 like Reply

aicha_lsfr ❤️ ❤️

1w 1 like Reply

mariammarianne ✊ ✊ ✊ ✊ ✊ ✌️ PS

2w 10 likes Reply

View replies (1)

catherine_lambert_art ❤️

1w 3 likes Reply

luschlaepfer ✊ ✊ ✊ ✊

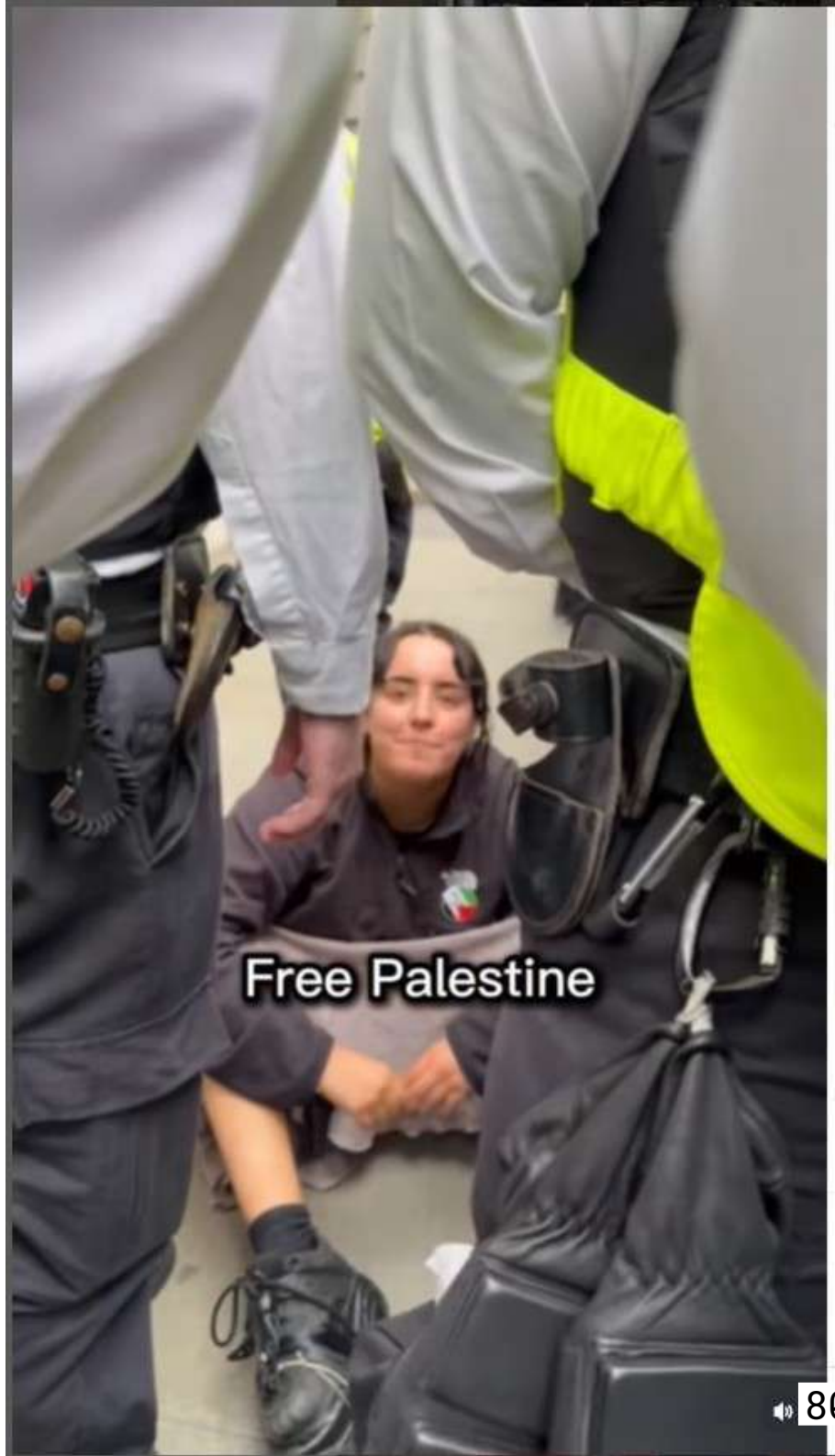
1w 2 likes Reply

2,189 likes
June 9

806

Add a comment...

Post



pal_action • Follow
Original audio

pal_action BREAKING: Actionist arrested whilst protesting at the UK Foreign Office in support of the 12 'Madleen' crew members who were kidnapped by the Israeli military.

Edited · 1w

camconn89 Let's go ❤️

1w 13 likes Reply

doctor.rahmeh The training days are really fun and you can learn more about what you can get involved with and make an informed decision PS

1w 31 likes Reply

View replies (4)

victortrancea 👏👏👏

1w 4 likes Reply

watermelon09702 So proud of these super human beings thank you so much ❤️

2w 130 likes Reply

View replies (2)

mrpezcub I'm in awe of your conviction! 👏 You're making a difference by speaking out against oppression and advocating for positive change.

1w 8 likes Reply

ladygold.222 Azione 🚨🚨🚨🌐 PS🕊️

10,896 likes

June 9

807

Add a comment...

Post

pal_action • Follow
London, United Kingdom

pal_action BREAKING: Palestine Action target the London HQ of Italian weapons firm Leonardo.

Leonardo supply the Israeli military with a range of weaponry, including naval guns and fighter jet parts, used to commit genocide in Gaza.

The arms company is the primary target of Palestine Acion's group in Italy and their Edinburgh factory has been repeatedly shut down by Palestine Action Scotland.

The resistance is global.

Photos by Novapix

1w

digitalslowmad.blog 🔥🔥🔥
1w 1 like Reply

teo.emj 👏👏👏👏👏👏👏
1w 4 likes Reply

erurizu 🔥🔥👏👏❤️
1w 2 likes Reply

shaikhnaim1 🔥🙌😳
1w 1 like Reply

fhna12235 Pal Action . May more join this heroic movement 👏👏👏
1w 29 likes Reply

2,927 likes
June 10

Add a comment... Post

pal_action • Follow
London, United Kingdom

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erurizu 🔥🔥👏👏❤️
1w 2 likes Reply

shaikhnaim1 🔥🙌😊
1w 1 like Reply

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2,927 likes
June 10

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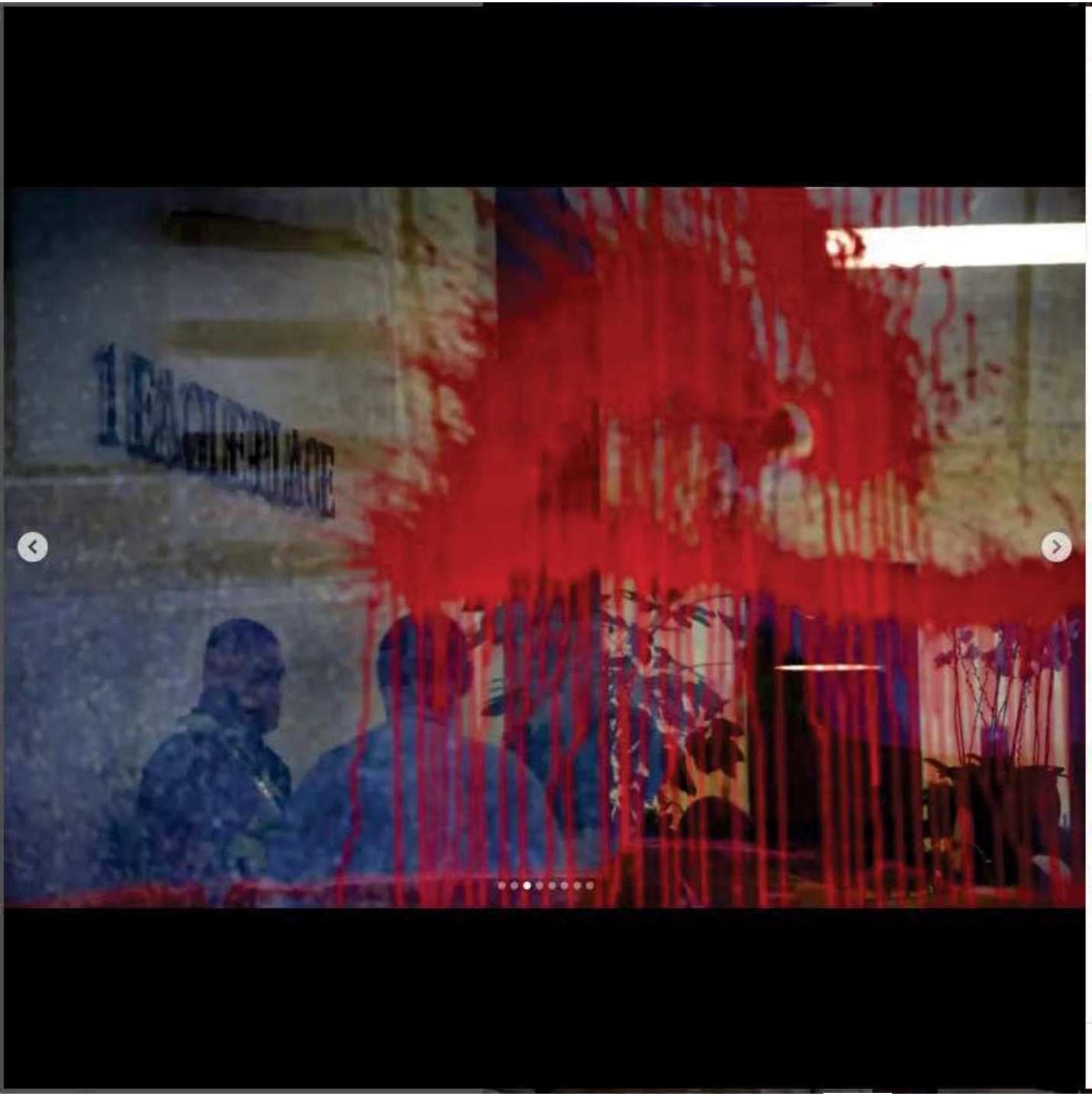

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London, United Kingdom

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1w 4 likes Reply

erurizu 🔥🔥👏👏❤️
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shaikhnaim1 🔥🙌😊
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Photos by Novapix

1w

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1w 1 like Reply

teo.emj 👏👏👏👏👏👏👏
1w 4 likes Reply

erurizu 🔥🔥👏👏❤️
1w 2 likes Reply

shaikhnaim1 🔥🙌😜
1w 1 like Reply

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June 10

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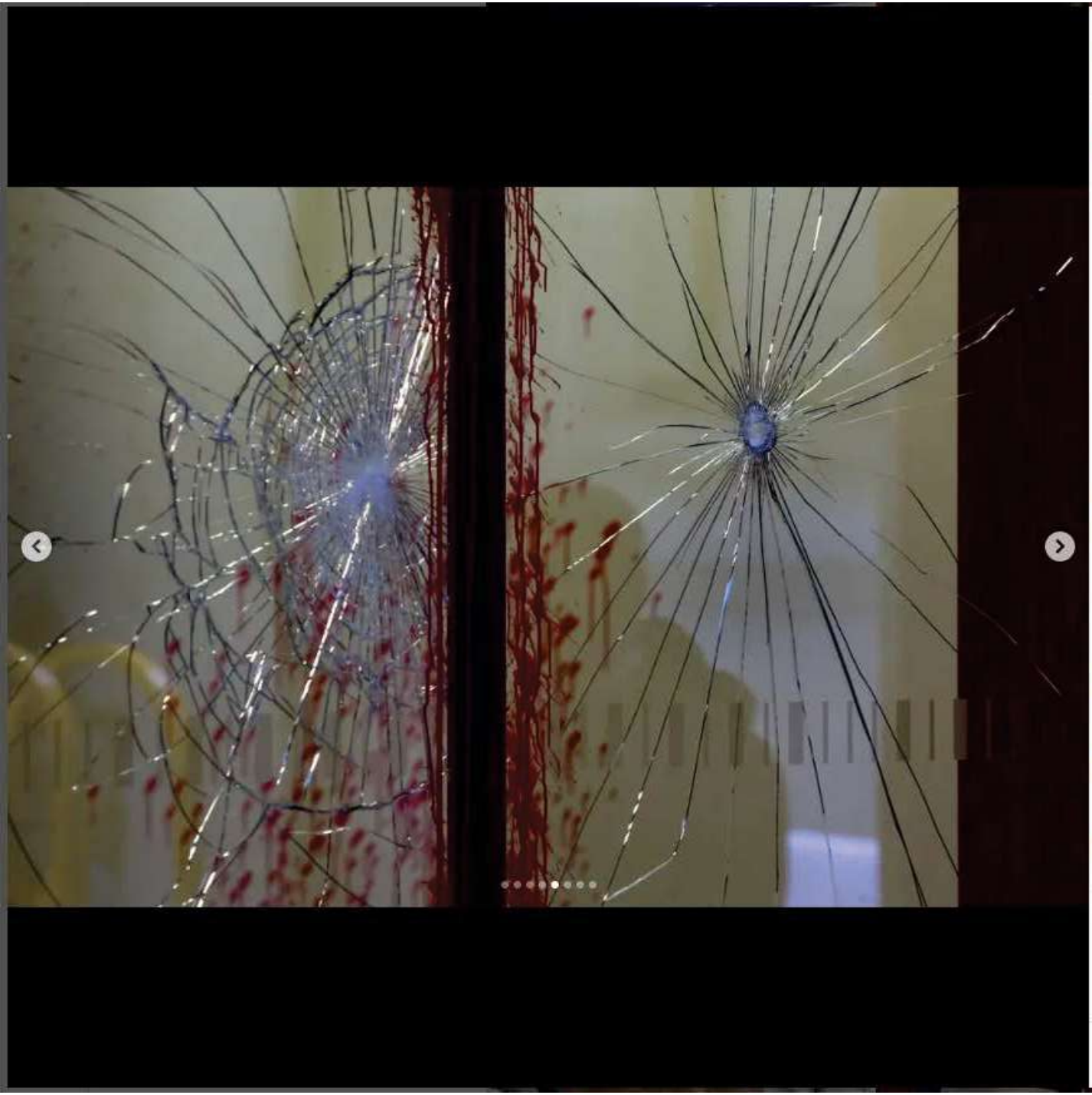

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Photos by Novapix

1w

digitalslowmad.blog 🔥🔥🔥
1w 1 like Reply

teo.emj 👏👏👏👏👏👏👏
1w 4 likes Reply

erurizu 🔥🔥👏👏❤️
1w 2 likes Reply

shaikhnaim1 🔥👐🥹
1w 1 like Reply

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1w 29 likes Reply

2,927 likes
June 10

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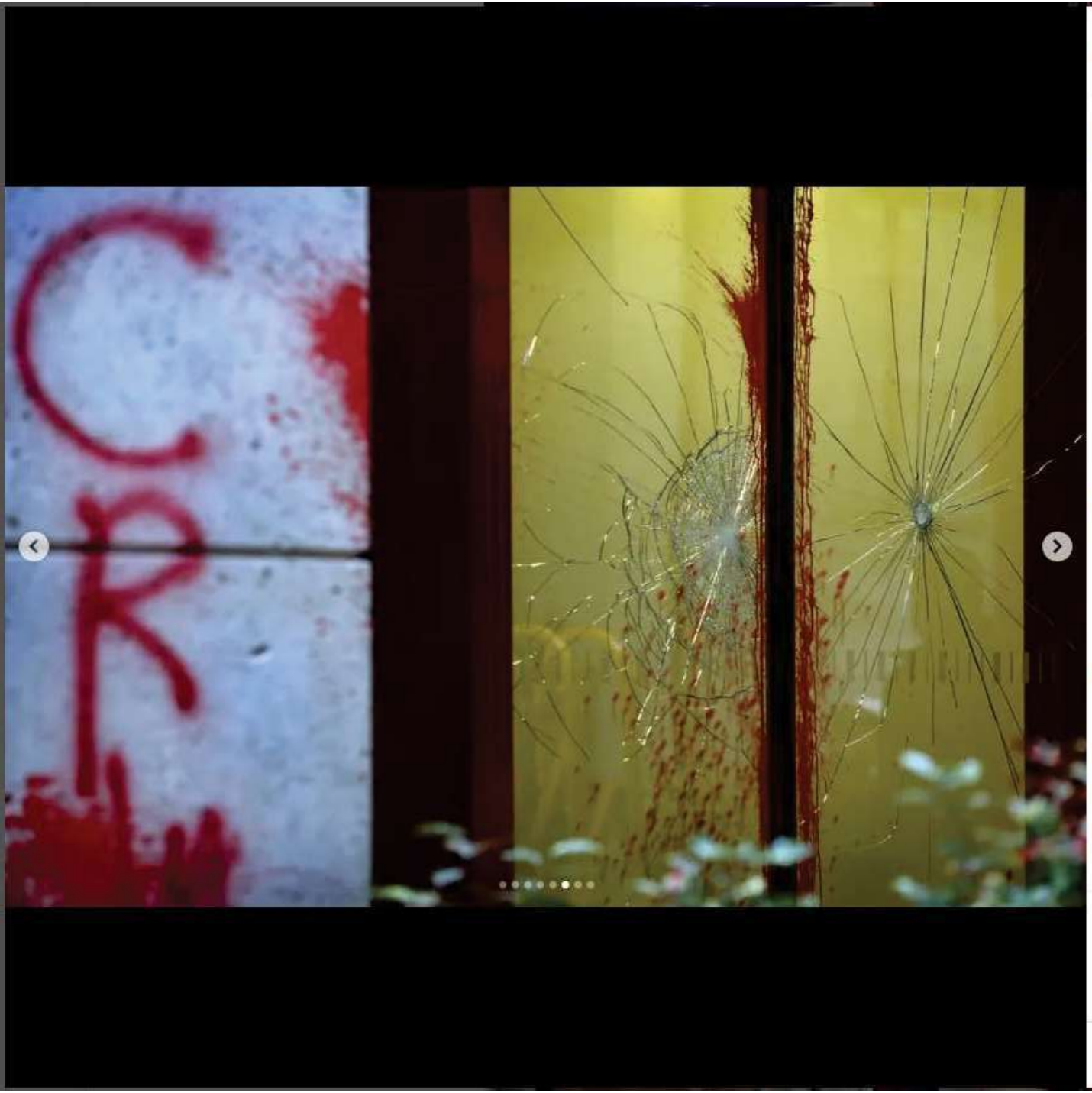

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Photos by Novapix

1w

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1w 1 like Reply

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1w 4 likes Reply

erurizu 🔥🔥👏👏❤️
1w 2 likes Reply

shaikhnaim1 🔥🙌😳
1w 1 like Reply

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2,927 likes
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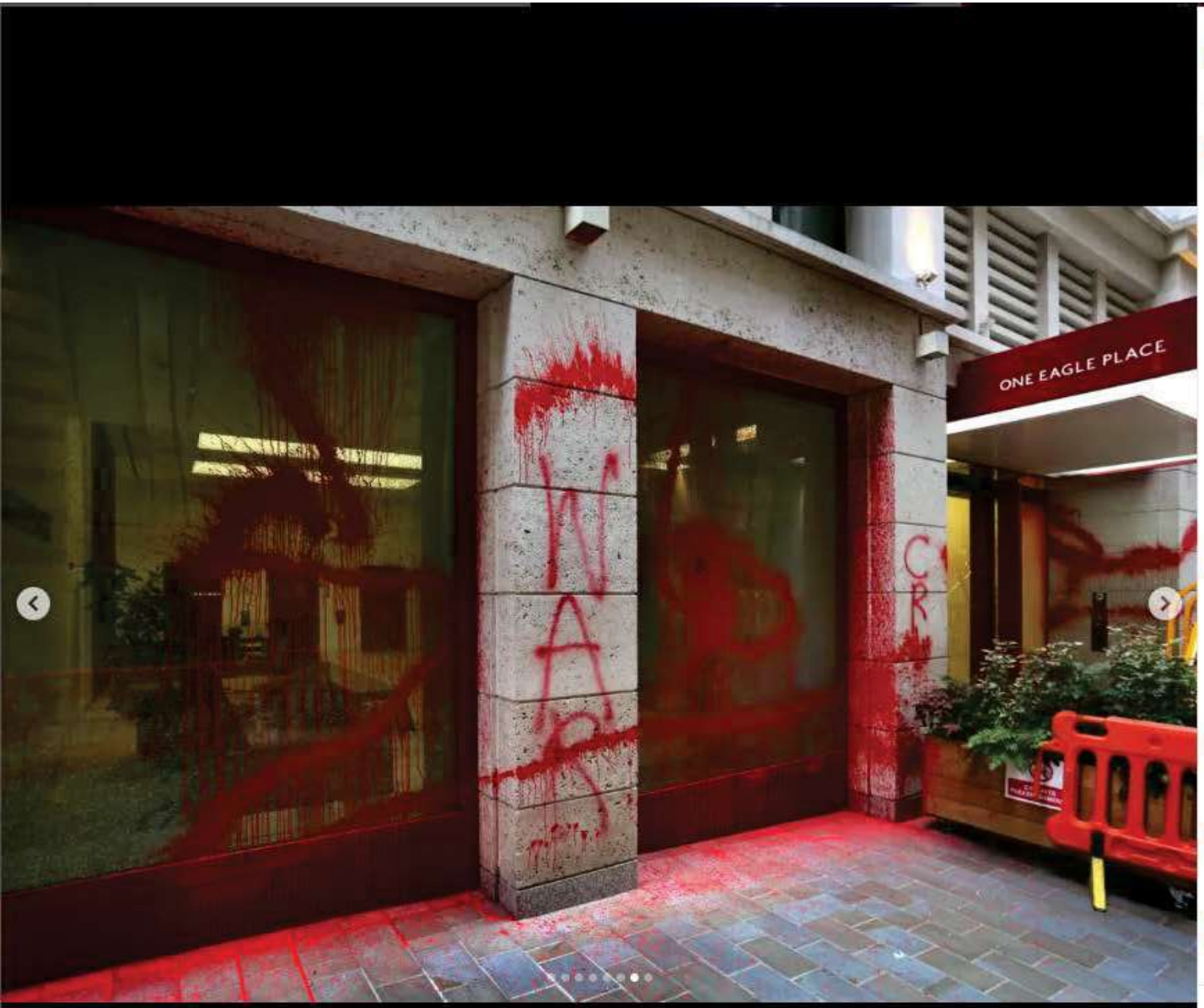

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1w

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shaikhnaim1 🔥🙌🥹
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1w

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1w 1 like Reply

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1w 4 likes Reply

erurizu 🔥🔥👏👏❤️
1w 2 likes Reply

shaikhnaim1 🔥🙌😋
1w 1 like Reply

fhna12235 Pal Action . May more join this heroic movement 👏👏👏
1w 29 likes Reply

2,927 likes
June 10

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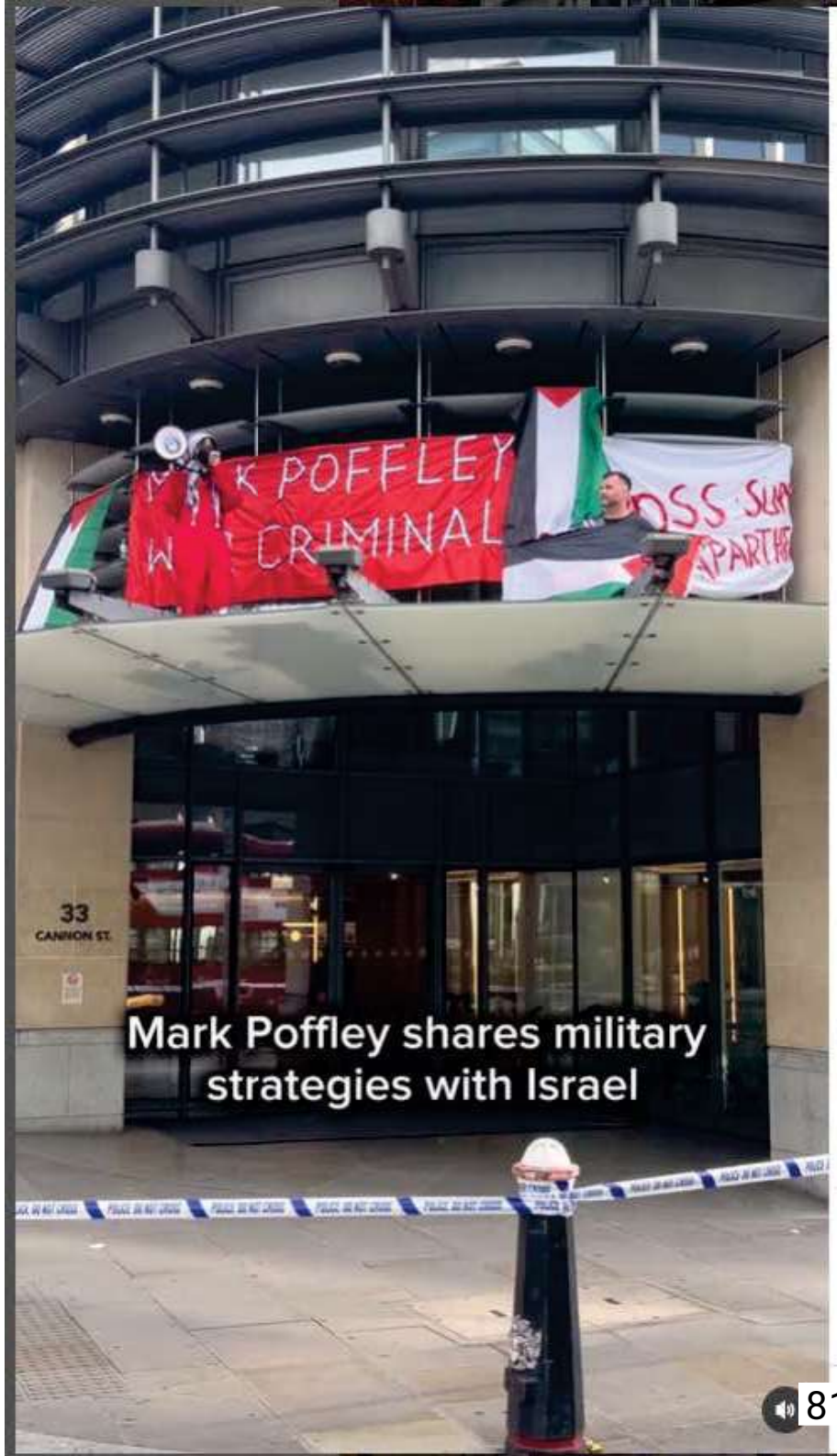

pal_action • Follow
Original audio

pal_action Palestine Action are currently occupying a weapons consultancy firm for international governments, which shares a director with Israel's biggest arms producer.

Mark Poffley used to be the Deputy Chief at the UK Ministry of Defence — now, he uses his contacts to further the genocide in Gaza.

War criminals can no longer hide in plain sight.

Support the ongoing action at 33 Cannon Street, London, EC4M 5SB

Edited · 1w

sulea182 👏👏👏👏👏..
1w 3 likes Reply

_rimaa_95 ❤️....
1w 2 likes Reply

leyla_karaca60 👏👏👏👏👏👏
1w 2 likes Reply

drzaina_gadema 🙌🙌🙌🙌🙌❤️❤️❤️❤️❤️
1w 1 like Reply

edinburghactivistsnetwork Love the chill of these humans 😍
1w 7 likes Reply

shaolin84 ❤️👏❤️👏❤️👏❤️👏👏❤️🔥🔥🔥🔥🔥

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June 12

816

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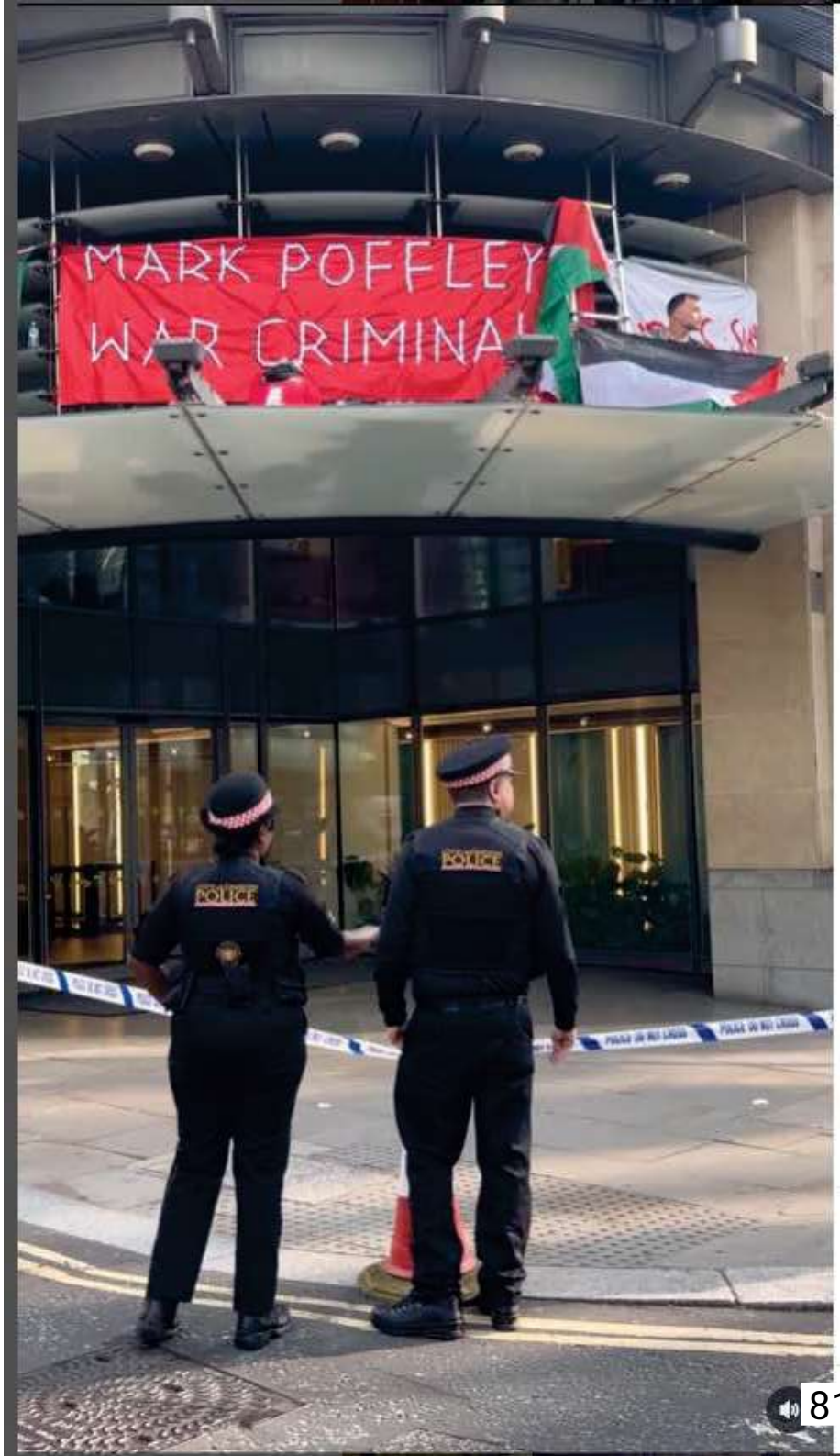


pal_action • Follow
BilalShabib • Ataba

pal_action War criminals can no longer hide in plain sight.

Mark Poffley, former deputy to the head of the British army, now works with both the weapons consultancy firm were occupying today and Israel's biggest weapons producer.

Using his contacts gained by overseeing a £38billion budget for the UK Ministry of Defence, he now profits from the escalating genocide in Gaza.

1w

aminahjpg ❤️ ❤️
1w 5 likes Reply

nesma.maher.12 💚 💚 💚
1w 9 likes Reply

annejoelleford 😍 😍 😍 😍 😍 😍 😍 😍
1w 5 likes Reply

nairobi078 🙌 🙌 🙌
1w 1 like Reply

cgstory12 🙌 🙌 🙌
1w 4 likes Reply

edinburghactivistsnetwork 👏 👏 👏
1w 6 likes Reply

asiah05 🍋 🍋 🍋

Liked by **eye.on.palestine** and **2,507 others**
June 12

817

Add a comment...

Post

pal_action • Follow
Original audio

pal_action The occupation of 'Universal Defence and Security Solutions' remains strong!

Mark Poffley, a director of Israel's biggest weapons producer, also sits on the board of the military consultancy firm.

Using his connections to government which he gained as the deputy to the head of the British army, he makes a killing from Israeli weaponry which is "battle-tested" on Palestinians.

Join the occupation now at 33 Cannon St, London!

1w

77makkun77 Wooohooo!!!!
1w 1 like Reply

aminahjpg keep it up beautiful people!
1w 4 likes Reply

kimiyaf ❤️❤️❤️
1w Reply

hannahxmills ❤️
1w Reply

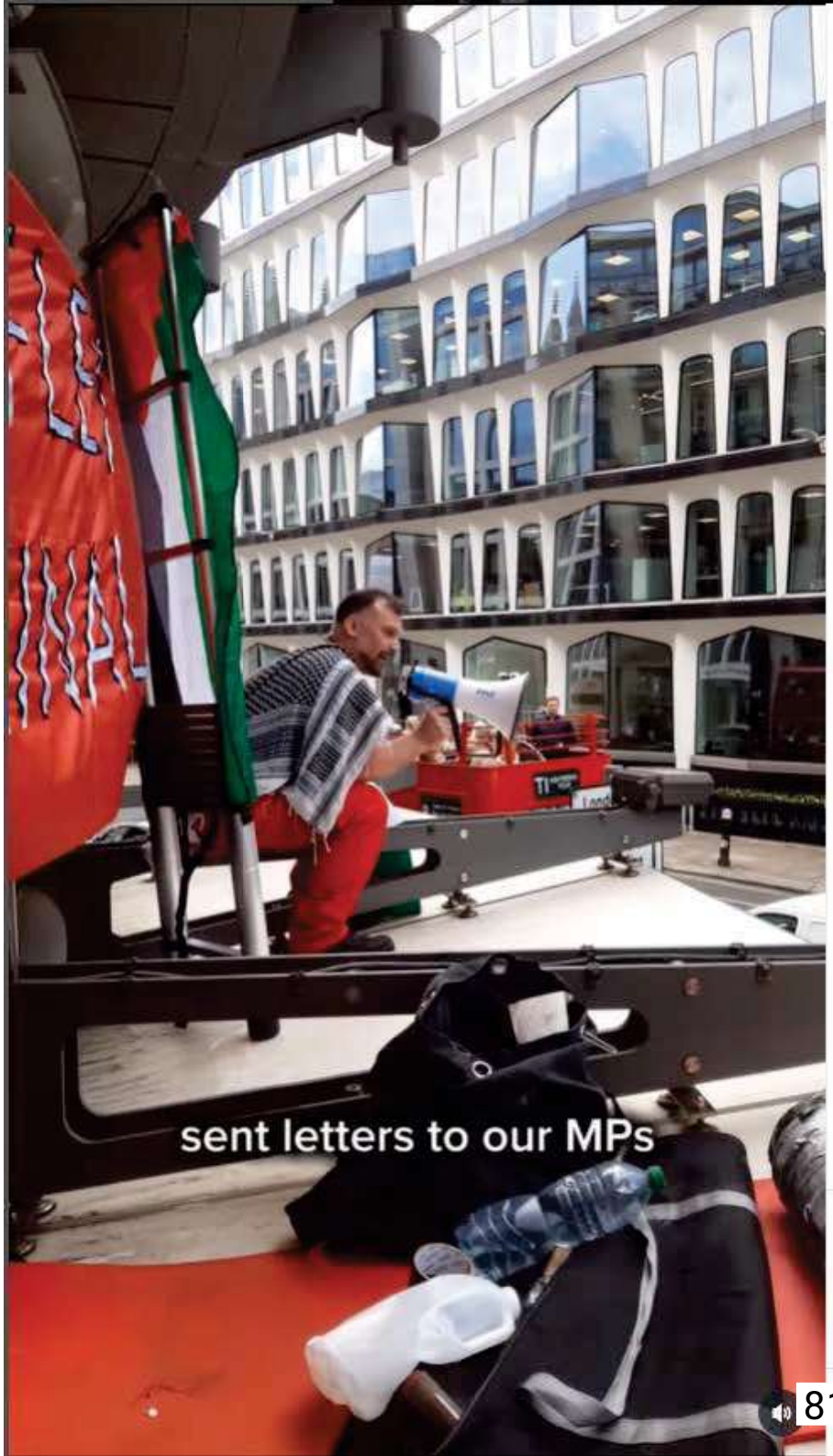
faizkarim86 Great respect for you all. God bless you all
1w 6 likes Reply

parveens.insta Heroes ✊ PS ❤️
1w 3 likes Reply

Liked by **eye.on.palestine** and **896 others**
June 12

818

Add a comment... Post



pal_action • Follow
Original audio

pal_action Direct action against the Israeli war machine has never been more necessary.

Palestine Action continues to occupy 'Universal Defence and Security Solutions, a military consultancy firm who share a director with Israel's biggest weapons producer.

Join us at 33 Cannon St, London!

1w

doctor.rahmeh ENOUGH IS ENOUGH 🫂 🔥 ✊🏿 legends 🍉🍉

1w 150 likes Reply

newcastlepsc keep going legends! we're with you all the way ❤️

1w 62 likes Reply

london_lime We love you!!!!! Absolute total heroes!

1w 54 likes Reply

doctor.rahmeh Training days are fun and available across the country. Go and see what you can get involved with ✊🏿 🔥

1w 69 likes Reply

View replies (2)

beardvoyage beautiful people

1w 14 likes Reply

Liked by **eye.on.palestine** and **7,757 others**

June 12

Add a comment... Post

pal_action • Follow
Original audio

pal_action Actionists have locked on to each other, to lengthen the occupation of a military consultancy in London, which shares a director with Israel's biggest weapons producer.

Get down as soon as possible to 33 Cannon St, London.

1w

zarahtoria Fucking love Pal Action, putting in real work and sacrifice 🍋 it's so frickin admirable and inspiring

1w 31 likes Reply

sarahcotterbds Legends 🔥❤️🙌

1w 4 likes Reply

aminahjpg when you think it can't get any better!! ❤️ ❤️

1w 3 likes Reply

sibtain_silver Well done you wonderful activists. Viva resistance.

1w 8 likes Reply

edinburghactivistsnetwork 🙌 🙌 🙌

1w 2 likes Reply

nowayits.mj FREE FREE PALESTINE PS

1w 3 likes Reply

mariethatsme1 ✊ 💪 PSPSPS

1w 7 likes Reply

1,895 likes
June 12

820

Add a comment...

Post

pal_action • Follow
Original audio

pal_action Two actionists resist until the very last moment in order to prolong the disruption to military consultancy firm, Universal Defence and Security Solutions.

The firm share a director with Israel's biggest weapons producer, who is Mark Poffley, former deputy to the head of the British army.

1w

vivavivapalestina786 👏👏
1w 1 like Reply

doctor.rahmeh 🔥🔥🔥🔥🔥
1w 4 likes Reply

aminahjpg Pal Action you make us so proud. ❤️
1w 17 likes Reply

mmr.stars will there be a police station support call out? ❤️
1w 10 likes Reply

sour.sumac Pal action You make us proud!
1w 26 likes Reply

margatelocationhouse So much love for Pal Action ❤️❤️❤️❤️
1w 14 likes Reply

ana.terapeutaintegrativa ❤️ #freepalestineps

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June 12

821

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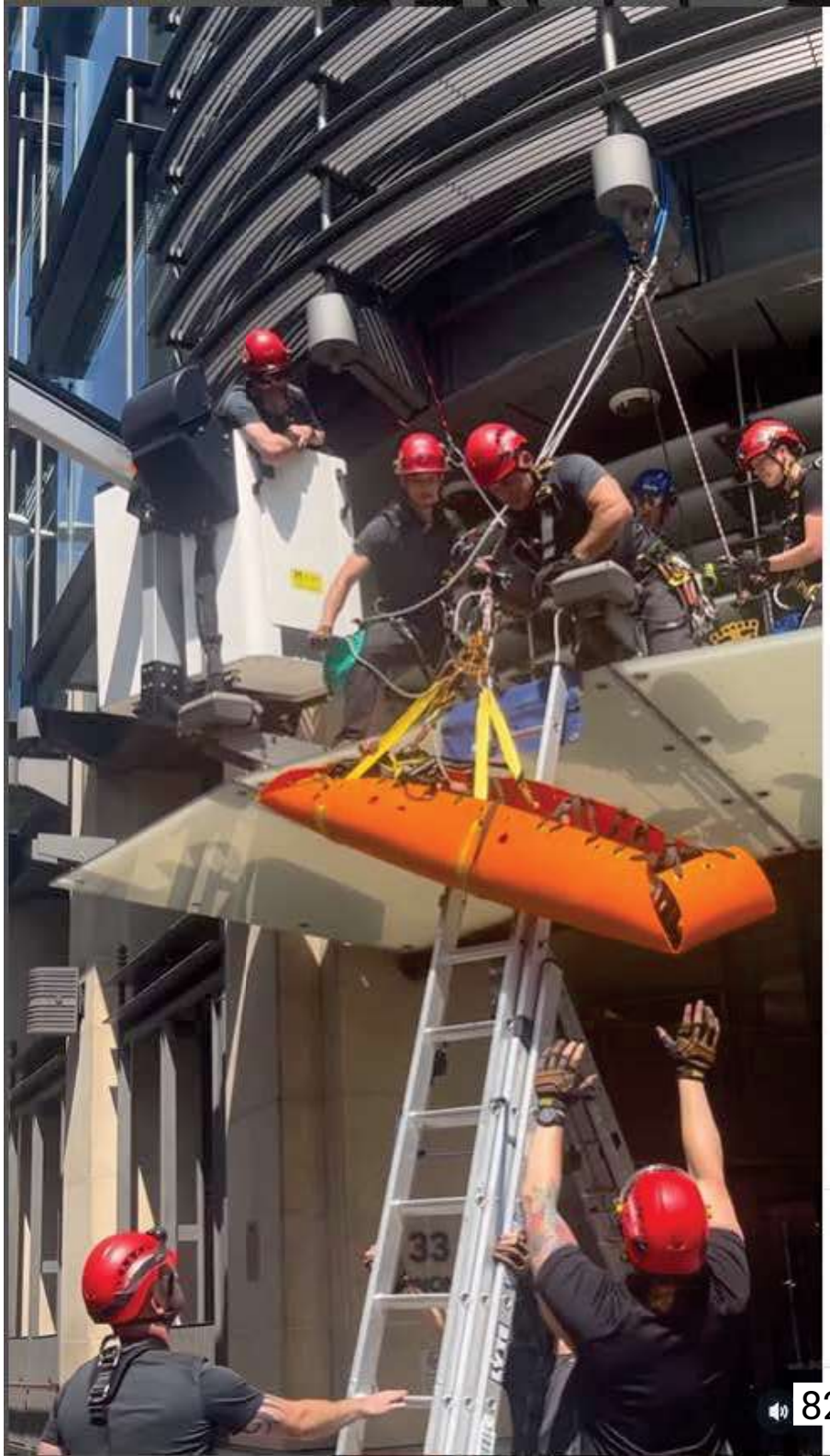

pal_action • Follow
Original audio

pal_action Two actionists arrested after they occupied a military lobby firm which shares a director with Israel's biggest weapons firm
1w

eye.on.palestine Heroes
1w 40 likes Reply

aminahjpg we LOVE you girl!!! two absolutely unreal humans
1w 26 likes Reply

amrin_ahmed1986 Plz explain what exactly they are offloading. Too excited to know! PS ✊ PS
1w 6 likes Reply

View replies (3)

hippydipppy 🔥🔥🔥
1w 3 likes Reply

avril.blethers Thank you Pal Action for doing the things most of us don't have the bravery for. Next level good humans!
1w 14 likes Reply

newcastlepsc PalAction you make us proud!!
1w 23 likes Reply

twentyeight.art We love you!!!
1w 9 likes Reply

Liked by eye.on.palestine and 1,781 others
June 12

822

Add a comment...

Post

pal_action • Follow
Lowkey • Intifada

pal_action BREAKING: Palestine Action Scotland target JP Morgan in Glasgow.

Despite cutting its shares in Elbit by over 50%, the bank still invests over $22million in Israel's biggest weapons producer.

Edited · 1w

iamchrislindsay 50% is 100% too much
1w 32 likes Reply

View replies (1)

candace.howie 👏👏👏👏
1w 1 like Reply

mrpezcub 👏👏👏👏
1w 1 like Reply

kobbo1888 ❤️❤️
1w 1 like Reply

parveens.insta Heroes ✊ PS ❤️
1w 3 likes Reply

sobya9514 👏👏👏👏👏
1w 1 like Reply

annelee_steyn Well done brave people!! Leve leve Falastine!
1w 3 likes Reply

2,476 likes
June 15

823

Add a comment...

Post

pal_action and **2 others**
Chelmsford, Essex

pal_action BREAKING: Palestine Action target the Chelmsford offices of Allianz.

By providing insurance for Israel's biggest arms producer, Allianz directly enable the manufacture of weaponry used to murder Palestinians.

Dozens of actions have now been taken against the insurance giant, and they will continue until Allianz drops Elbit!

Photos by Direct Action Images

3d

xrforpalestine ❤️❤️❤️
3d 3 likes Reply

sarahali.b 😍😍😍
3d Reply

edinburghactivistsnetwork 👏👏👏
3d 2 likes Reply

hippydipppy 👏👏👏🔥🔥🔥
3d Reply

tm__stn 🔥🔥🔥
2d Reply

mamapubg ❤️❤️❤️❤️❤️❤️❤️
3d Reply

1,973 likes
3 days ago

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sarahali.b 😍😍😍
3d Reply

edinburghactivistsnetwork 👏👏👏
3d 2 likes Reply

hippydipppy 👏👏👏🔥🔥🔥
3d Reply

tm__stn 🔥🔥🔥
2d Reply

mamapubg ❤️❤️❤️❤️❤️❤️❤️
3d Reply

1,973 likes
3 days ago

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3d Reply

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3d 2 likes Reply

hippydipppy 👏👏👏🔥🔥🔥
3d Reply

tm__stn 🔥🔥🔥
2d Reply

mamapubg ❤️❤️❤️❤️❤️❤️❤️
3d Reply

1,973 likes
3 days ago

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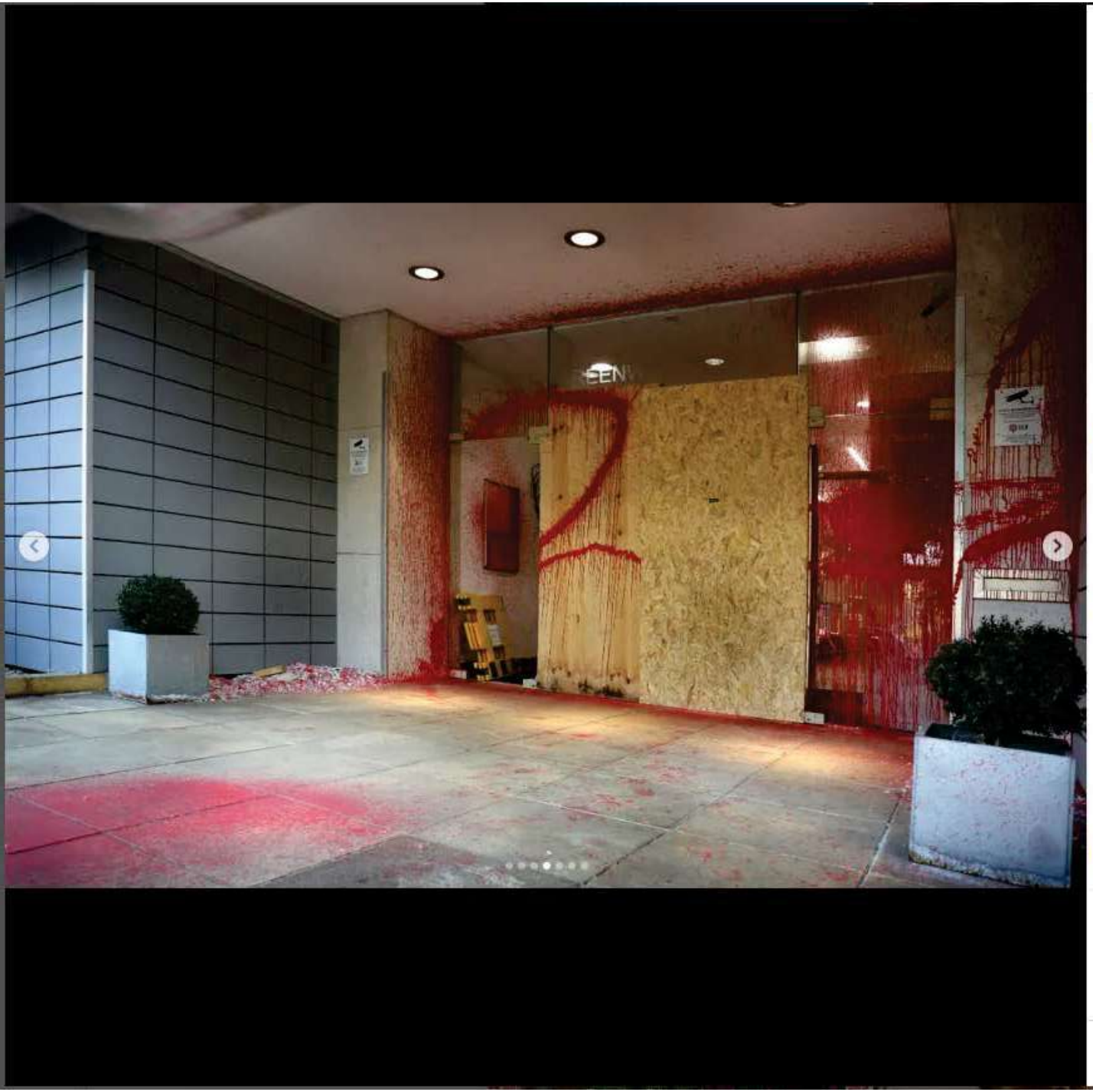

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Dozens of actions have now been taken against the insurance giant, and they will continue until Allianz drops Elbit!

Photos by Direct Action Images

3d

xrforpalestine ❤️❤️❤️
3d 3 likes Reply

sarahali.b 😍😍😍
3d Reply

edinburghactivistsnetwork 👏👏👏
3d 2 likes Reply

hippydipppy 👏👏👏🔥🔥🔥
3d Reply

tm__stn 🔥🔥🔥
2d Reply

mamapubg ❤️❤️❤️❤️❤️❤️❤️
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1,973 likes
3 days ago

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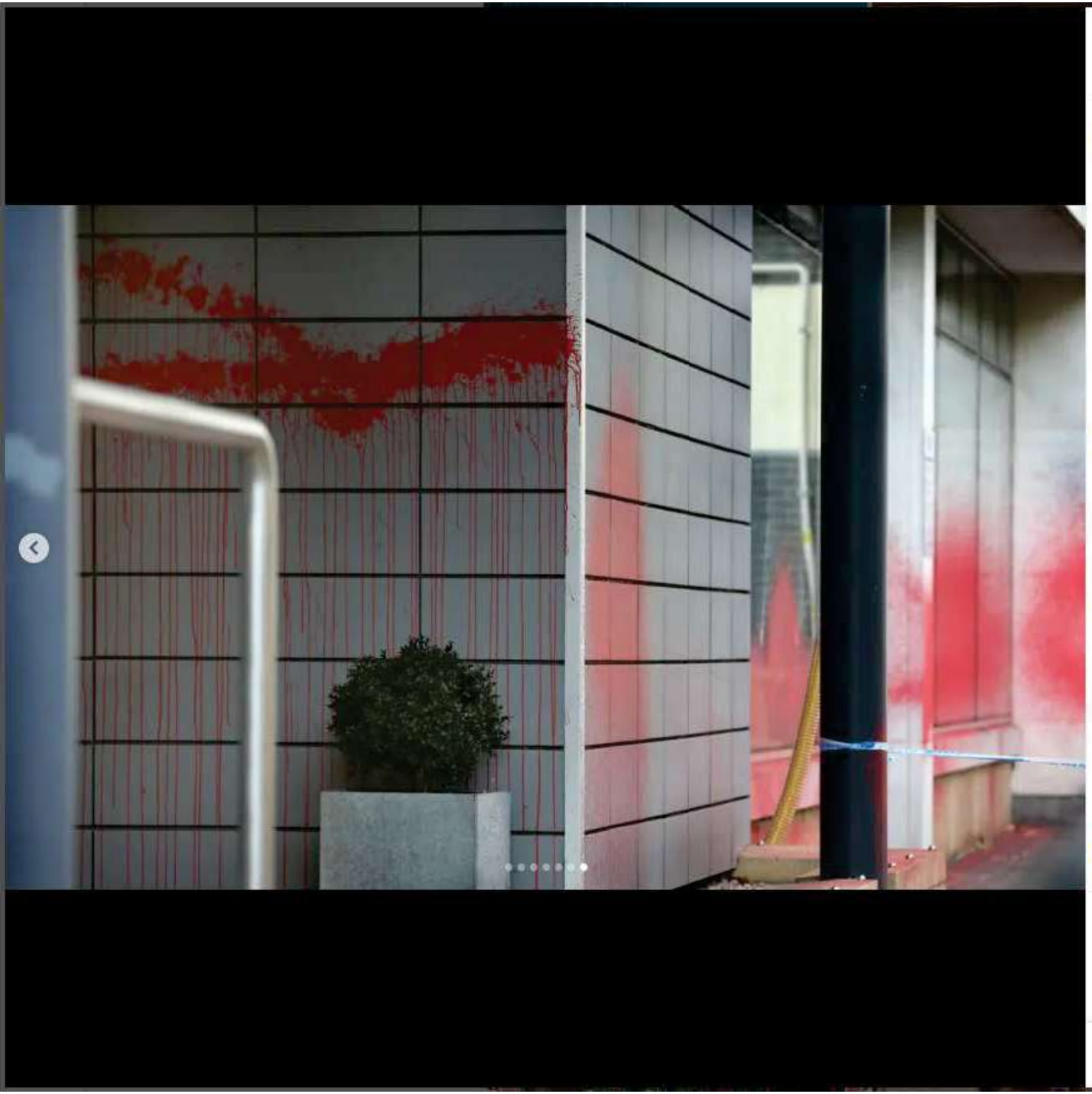

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Work with Elbit? Expect Palestine Action.

3d

juminten5054 We love you humanity people 💚❤️🤍🖤🙏

3d 47 likes Reply

_rimaa_95 🙌😍

3d 1 like Reply

jenny_nibhaolain 🔥🔥🔥

3d 5 likes Reply

wendycook303 👏👏👏👏

3d 7 likes Reply

ealingfriendsofpalestine Red our favourite colour.

🔻🔻🔻🔻🔻🔻

3d 65 likes Reply

georges.gaff 🙌🙌🙌🙌🙌

3d 5 likes Reply

pal.actions_tn 🔻🔻🔻🔻

18,739 likes
3 days ago

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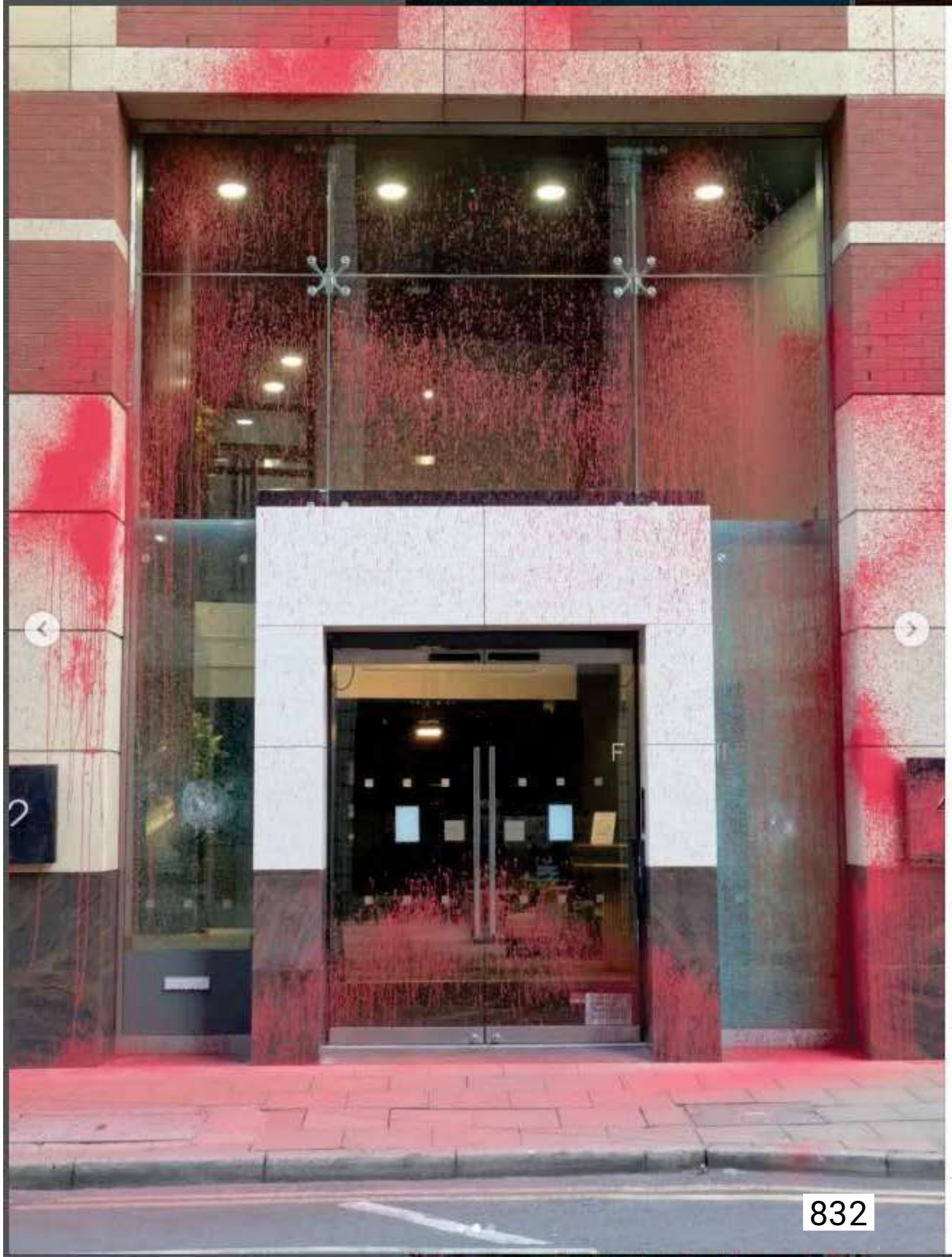

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Add a comment... Post

833

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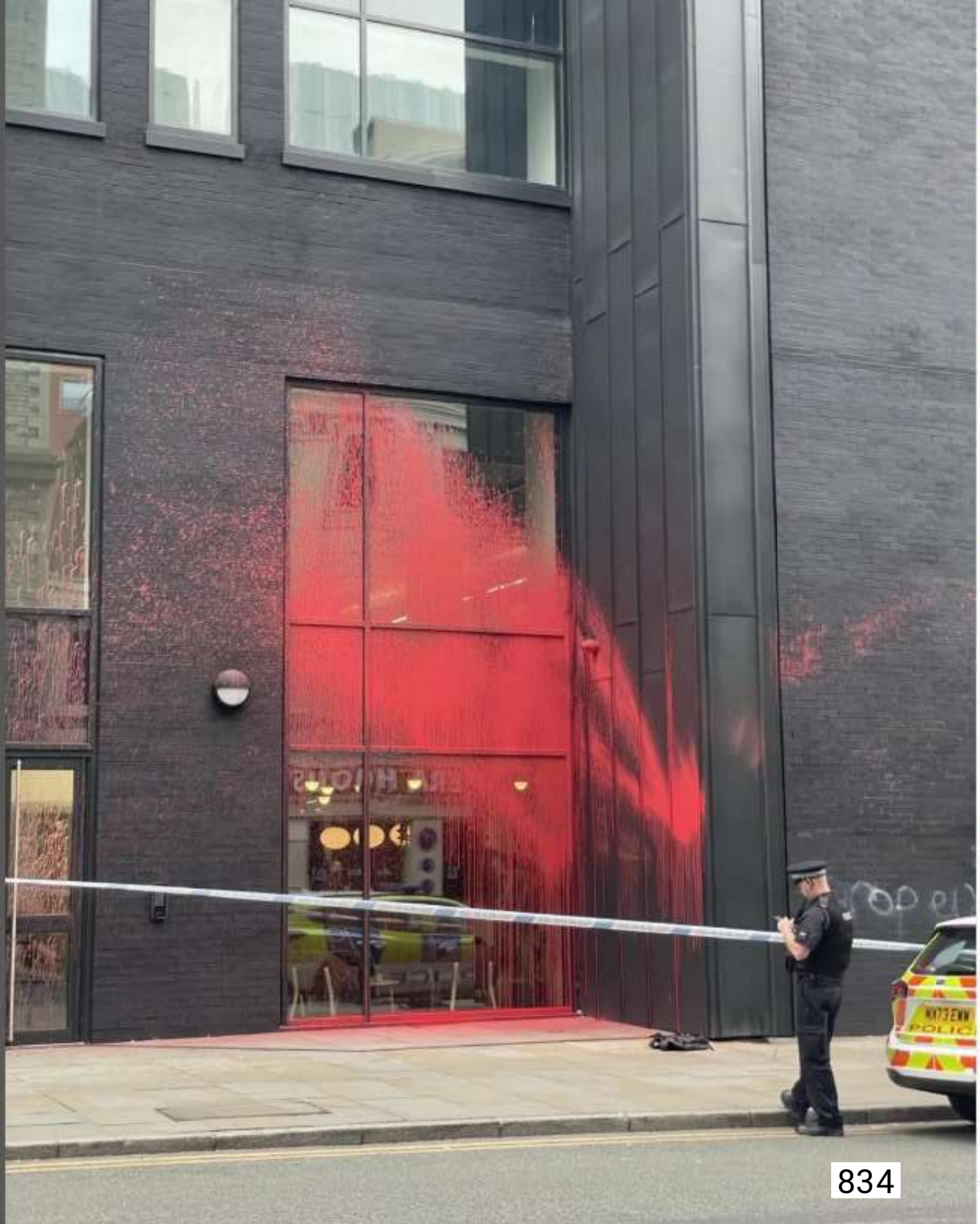
41

Post



pal_action • Follow
Manchester

pal_action BREAKING: Palestine Action target the Manchester office of CDW, tech suppliers for Israel's biggest weapons producer, Elbit Systems.

Today, actionists also decommissioned two British military planes and targeted Elbit's insurers.

3d

danielle_phoenixrising Legends!!!!!! ✊ PS

3d 28 likes Reply

o_shocknasty 👏👏👏

3d 1 like Reply

roundroundmrrrygoround Playing an absolute blinder today folks! Xxx

3d 29 likes Reply

View replies (1)

homalien649 👏🙌 Free Palestine!PS

3d 20 likes Reply

rossellabitti ❤️

3d 1 like Reply

melisaa 🔥

2d 1 like Reply

zhulduz.kun 🙌🔥🔥🔥🔥❤️❤️❤️

3,880 likes

3 days ago

Add a comment...

pal_action and **3 others**
University of Liverpool

pal_action BREAKING: University of Liverpool Engineering building and Vice Chancellors office targeted over research partnerships with weapons manufacturers.

Qinetiq is one of these partnerships. They have received several export licenses to Israel and fulfilled contracts for the Watchkeeper drone, developed for the British army by Elbit Systems and Thales. These have been described as the backbone of Israel's illegal occupation of the Gaza Strip.

Another is Leonardo, an Italian 'defense' company. Leonardo is the 9th largest weapons manufacturer in the world, exporting arms to a number of oppressive regimes including Israel.

The university also has an active partnership with Rolls Royce, who is involved with the F-35 programme.

This action follows global calls for the university to cut ties with arms companies or face consequences, and is a reminder for any potential students attending the open day that this university is guilty of committing genocide in Palestine.

3d

london_lime wow!!!! amazing amazing work! pal action is on a roll today. what a day!

2d 13 likes Reply

parveens.insta Heroes ✊ PS 💖 👏👏👏👏

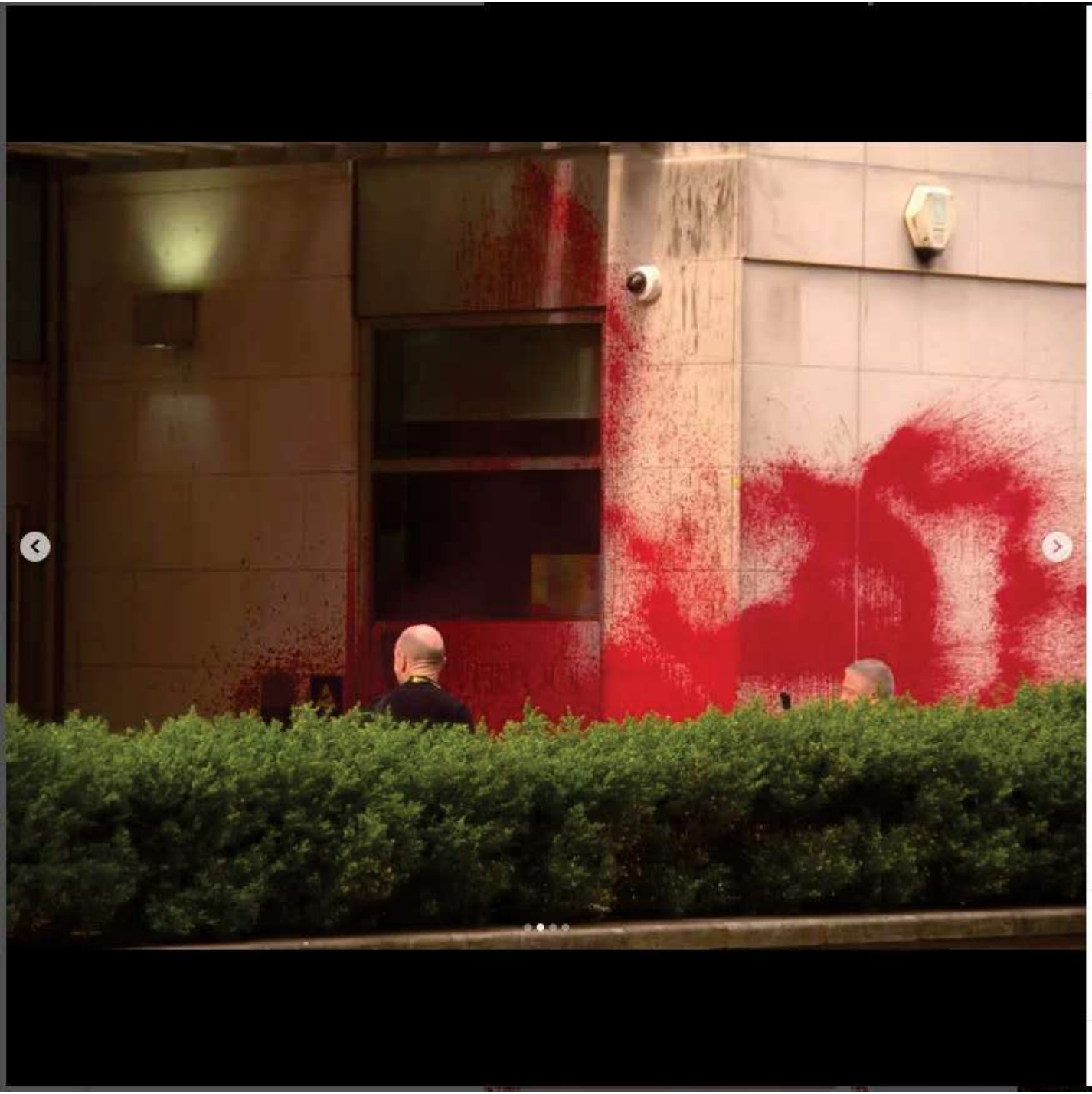
3d 80 likes Reply

View replies (1)

mari_am1445 👏👏👏👏

31,534 likes
3 days ago

Add a comment... Post



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839

pal_action and 3 others

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The message remains clear: if you enable Elbit, expect us.

Photos by Direct Action Images

Edited · 1d

futureselfhouse In Star Wars everyone supports the resistance - we should do the same in real life 🙌

1d 460 likes Reply

View replies (3)

afonsodimasmartins They don't mind the blood on their hands, but mind the paint on their buildings? 😂 Keep it up Pal Action PS

1d 579 likes Reply

View replies (1)

chrishaughton 👏👏👏 Thank you so much for the work you are doing.

1d 144 likes Reply

View replies (1)

eleanorweeksbell Yes!! Unwavering solidarity 🔥❤️

1d 74 likes Reply

View replies (1)

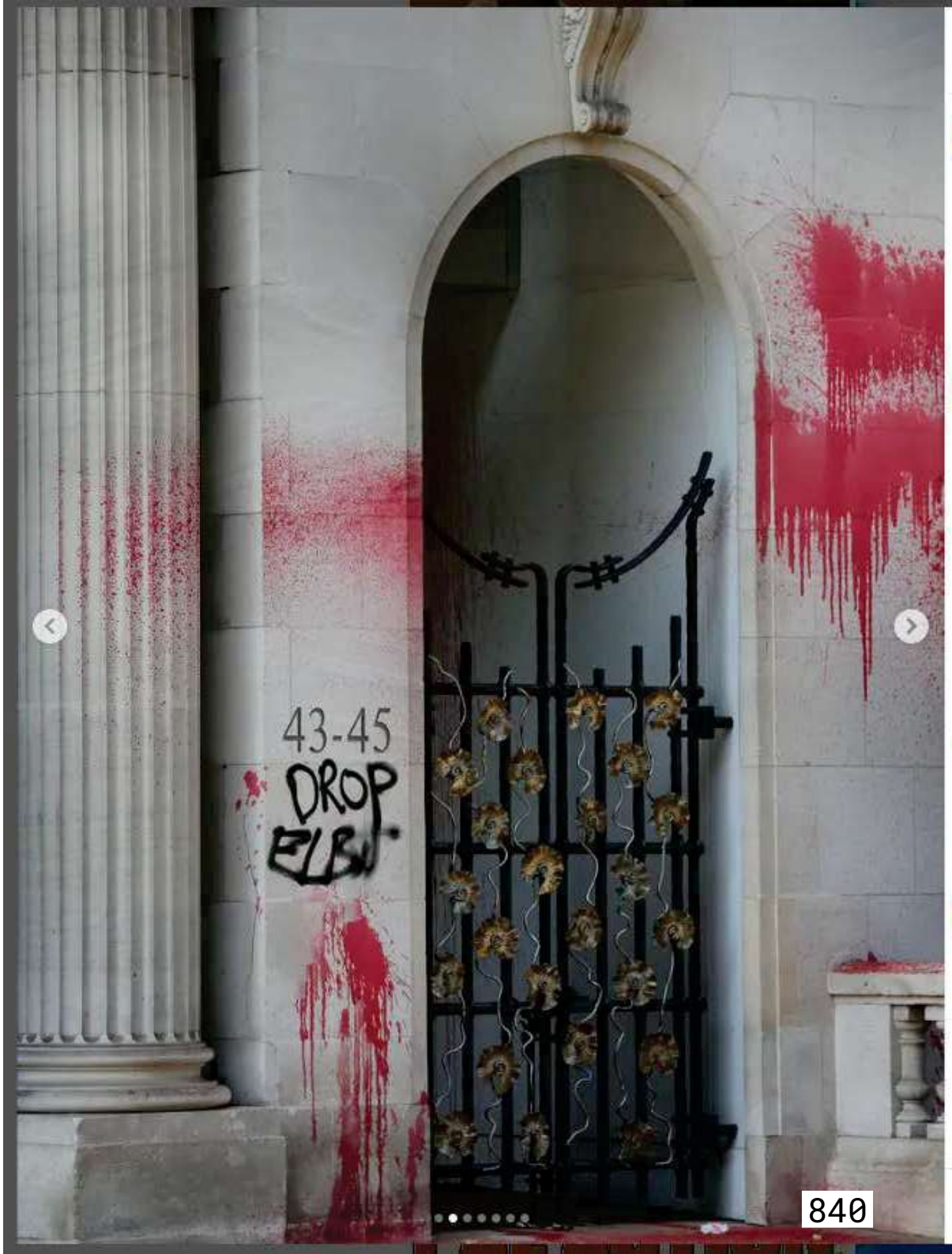
25,646 likes

1 day ago

Add a comment...

47

Post



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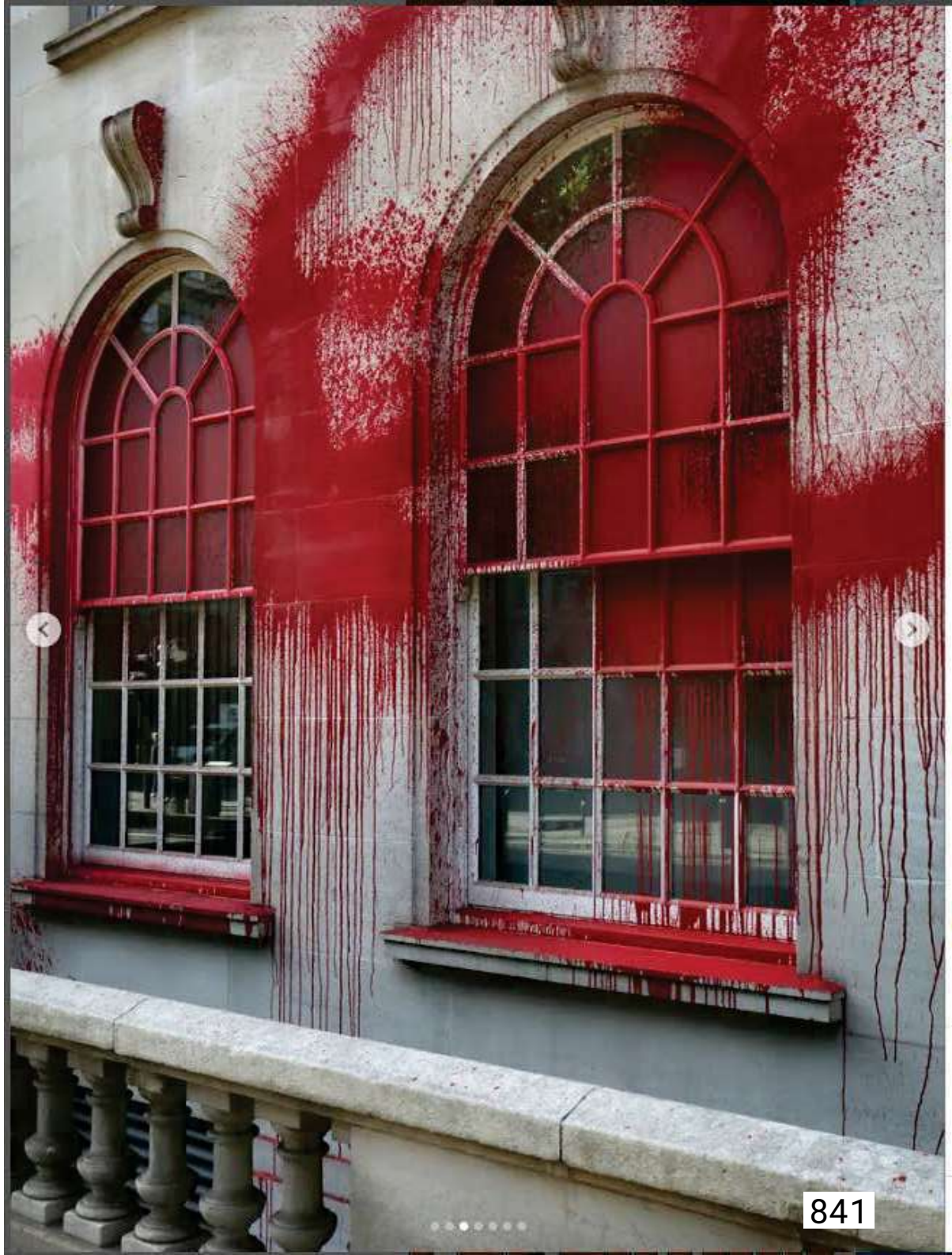
840

48



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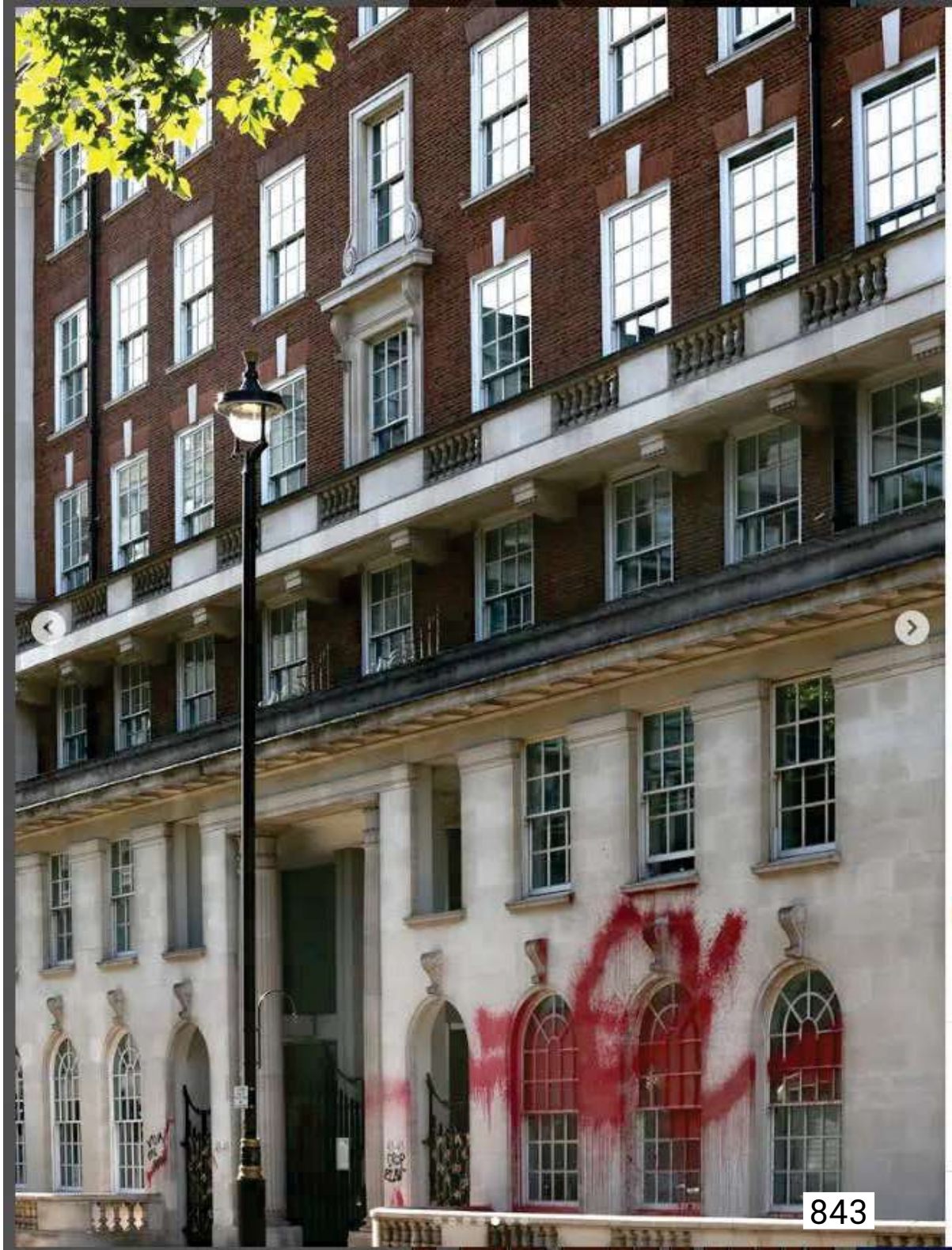

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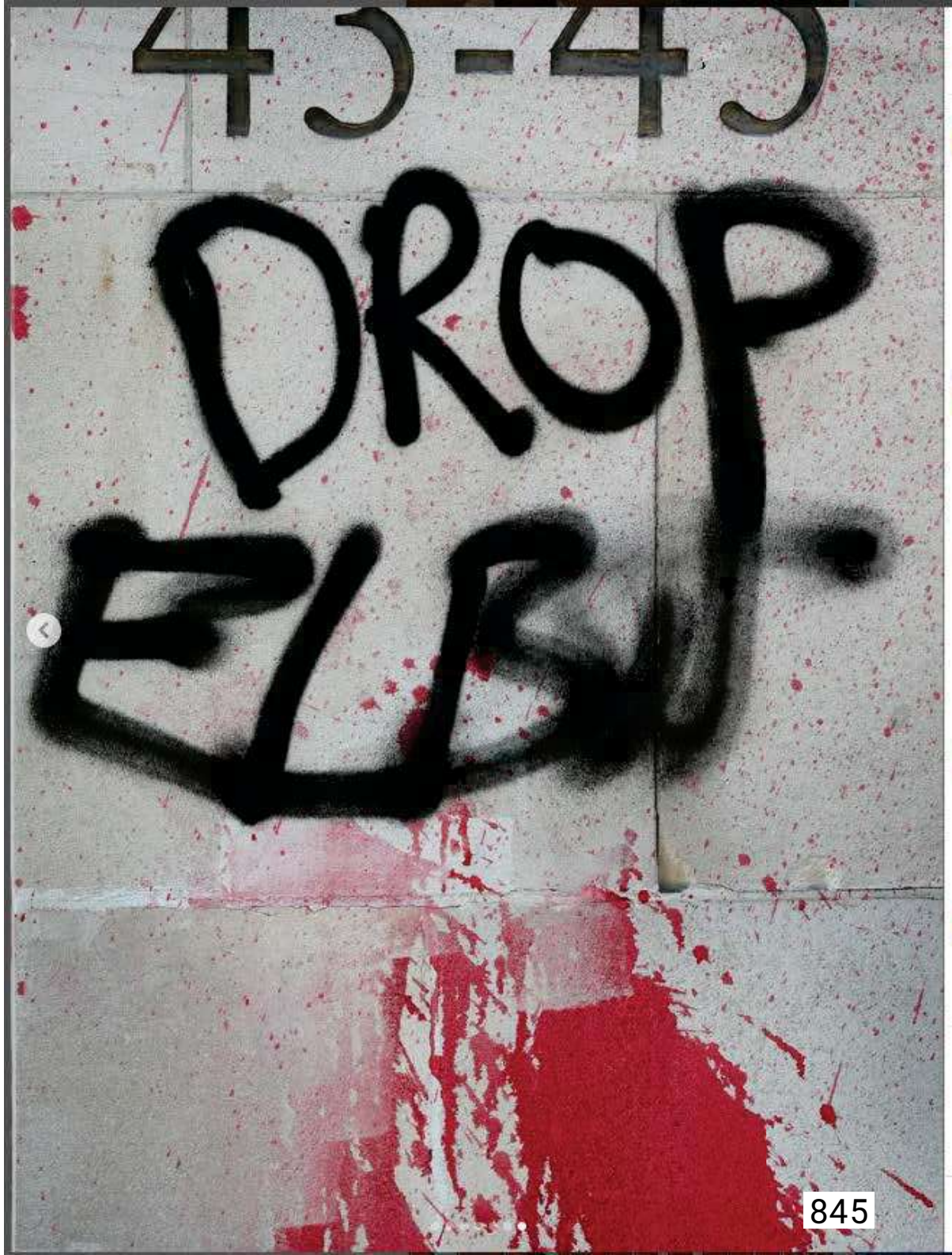

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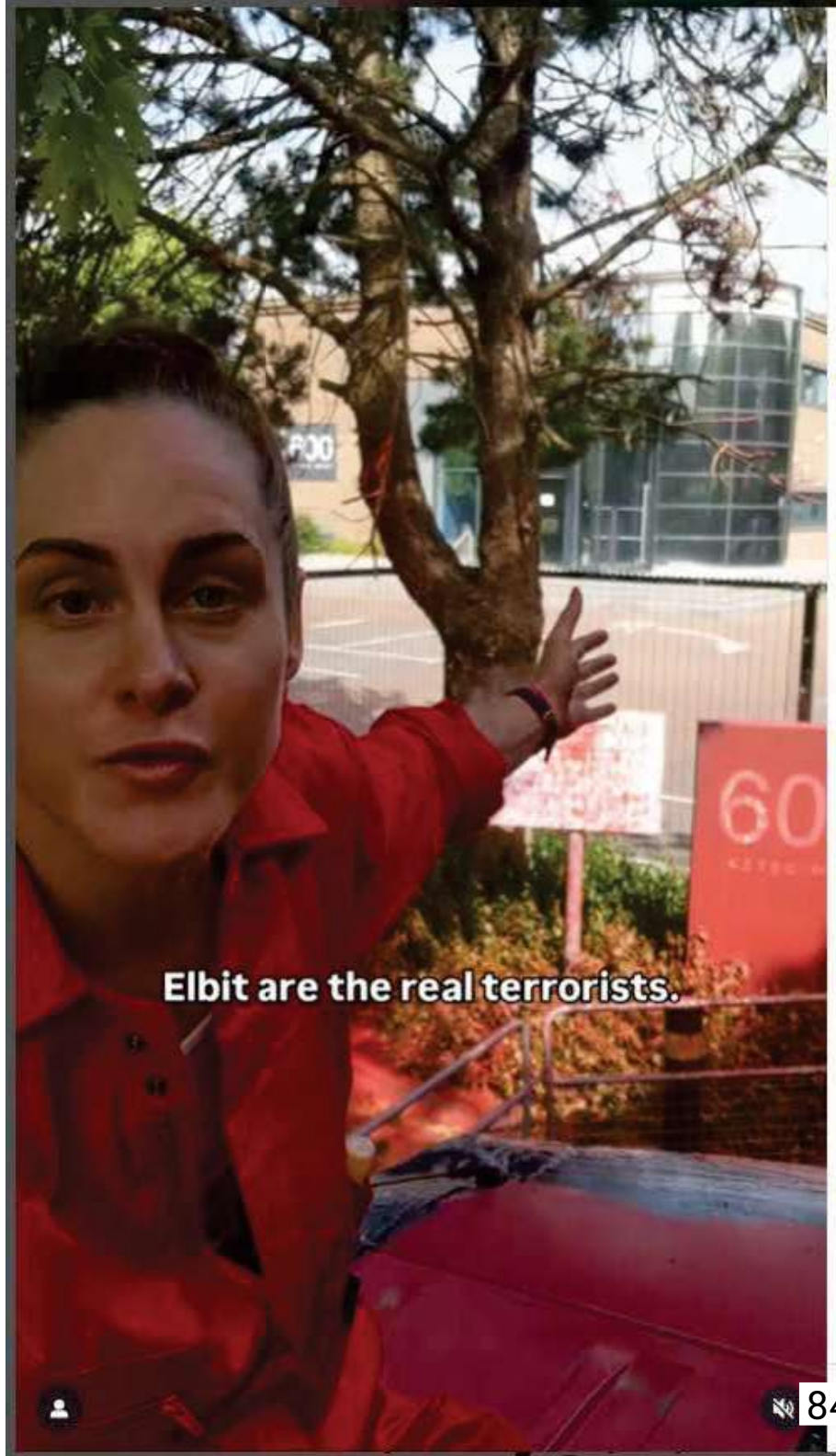


pal_action and 2 others
Original audio

pal_action Today, actionists shut down the Bristol HQ of Israel's biggest weapons producer, Elbit Systems.

Elbit are the terrorists, not Palestine Action.

1d

jessiejessyg So much love for you all. ❤️ ❤️ 🤎

1d 34 likes Reply

View replies (1)

this_hybrid_reads I love you guys with the purest form of love there is. You are heroes in the truest sense.

1d 228 likes Reply

View replies (1)

europe.palestine.network 💗 💗 💗

1d 47 likes Reply

thebigkathika ❤️ 👏 🙌

19h 1 like Reply

surf_mandalore 🤎 🤎 🤎 ❤️ ❤️ ❤️

17h 2 likes Reply

pamhoggfashion ❤️ 🕊️ 🤎 ⚔️

22h 6 likes Reply

urbanxhippi 👏 👏 👏

13,173 likes
1 day ago

Add a comment... Post

pal_action and **5 others**
Original audio

pal_action BREAKING: Palestine Action are blockading the only entrance to Elbit's Bristol HQ, to shut down the Israeli weapons maker!

From atop a van, actionists have locked on to each other to prevent access to the British command centre of Israel's biggest weapons producer.

For Palestine, we shut Elbit down.

Support the ongoing action at Elbit, Aztec West 600, Patchway, Bristol!

Edited · 1d

london_lime AMAZING! and I am barely waking up and Pal Action is already storming it! We love you!!!

1d 176 likes Reply

View replies (2)

reb.duce PalAction are heroes and make us so proud 🍉 Free Free Palestine

1d 385 likes Reply

View replies (2)

chrishaughton 👏👏👏

21h 1 like Reply

abby.faye.yoga Opposing genocide isn't terrorism. Genocide is. Free Palestine ❤️

1d 375 likes Reply

13,977 likes
1 day ago

Add a comment... Post

pal_action and **5 others**
Original audio

pal_action Palestine Action SHUT DOWN the British command centre of Israel's biggest weapons producer.

It's our duty to disrupt the genocidal supply chain.

Mobilise at Elbit, Aztec West 600, Patchway, Bristol

1d

eva_maria_beatrice Every person speaking up for Palestine matters. Every single one PS

1d 265 likes Reply

View replies (12)

thekasheff The whole Youth Demand group is proud of you ❤️ PS

1d 185 likes Reply

View replies (1)

kuralila Yes! Shut it down! You beautiful humans ❤️

1d 96 likes Reply

leonies.arts ❤️ 🙌 awesome work

1d 19 likes Reply

aishafromwales Heroes, every one of you. 🔥 ❤️

1d 124 likes Reply

View replies (1)

36,691 likes
1 day ago

Add a comment... Post

pal_action and 3 others

pal_action Days away from potentially being proscribed and Palestine Action shut down the HQ, and supplier, of Israel's biggest weapons producer.

Direct action until victory!

1d

m.l.s.x.x 🙌🙌🙌🙌

1d Reply

View replies (1)

amyexton Long live Palestine Action ❤️

1d 7 likes Reply

View replies (1)

the_only_boleyn ❤️❤️❤️ we are all Palestine action

1d 43 likes Reply

View replies (1)

tiger_knots_macrame We are all Pal Action! True Heros!

1d 76 likes Reply

View replies (1)

crochetfromthewood 🍋🍋🍋

1d Reply

View replies (1)

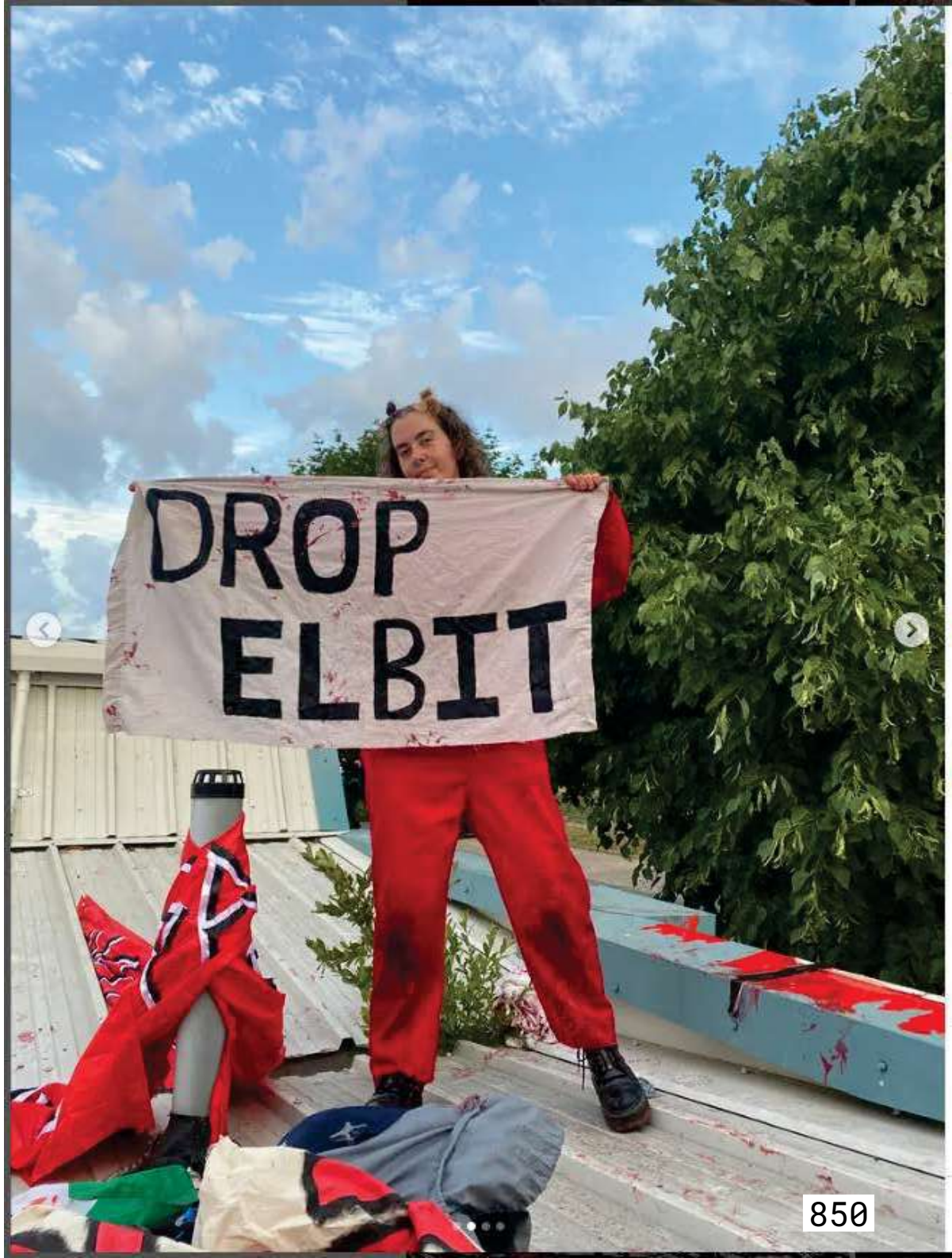
18,040 likes

1 day ago

Add a comment... Post

849

57



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1d 43 likes Reply

View replies (1)

tiger_knots_macrame We are all Pal Action! True Heros!

1d 76 likes Reply

View replies (1)

crochetfromthewood 👏 👏 👏

1d Reply

View replies (1)

18,040 likes

1 day ago

Add a comment... Post

850

58

pal_action and 3 others

pal_action Days away from potentially being proscribed and Palestine Action shut down the HQ, and supplier, of Israel's biggest weapons producer.

Direct action until victory!

1d

m.l.s.x.x 🙌🙌🙌🙌

1d Reply

View replies (1)

amyexton Long live Palestine Action ❤️

1d 7 likes Reply

View replies (1)

the_only_boleyn ❤️❤️❤️ we are all Palestine action

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crochetfromthewood 👏👏👏

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View replies (1)

18,040 likes

1 day ago

Add a comment...

60

Post

pal_action and 4 others
Original audio

pal_action BREAKING: Palestine Action are occupying the roof of Guardtech, suppliers to Israel's biggest weapons producer.

This company makes and repairs clean rooms for Elbit Systems, which are essential for factories to be able to make weaponry to massacre Palestinians.

Today, we're here to shut it down.

Support the action at Unit 2-3 Highbury Road, Brandon, Suffolk IP27 0ND

1d

amyexton ❤️❤️❤️❤️❤️
1d 9 likes Reply

andreakimvaldez You are such heroes!
1d 99 likes Reply

View replies (2)

futureselfhouse 🙌
19h 3 likes Reply

jewishantizionistnetwork 👏👏👏👏👏
20h 6 likes Reply

jessmonroex 👏👏👏👏👏👏👏👏
1d 6 likes Reply

nishenton ✌️❤️✊

10,466 likes
1 day ago

Add a comment... Post

pal_action and 2 others
Original audio

pal_action Police have arrived but actionists remain on the roof of Guardtech, suppliers to Israel's biggest weapons producer.

Through direct action, they're halting the operations of the cleanroom producers, who make it possible for Elbit to make weapons to be used against the Palestinians.

Mobilise at Unit 2-3 Highbury Road, Brandon, Suffolk, IP27 0ND

1d

empath_action My neighbour, a woman on her own, got an intruder at night in her home. She called 999, they said they were sending someone. That someone never came... she was also told, when she called again to complain, as no one was physically hurt (who cares about her mental health following the incident) and nothing was stolen 'no crime was committed'!!! 'Glad' to see the police come fast when peaceful protesters are 'threatening' multi-million £ pro-genocide companies

1d 495 likes Reply

View replies (12)

khadijabarisse 🔥🔥🔥

1d 3 likes Reply

vivavivapalestina786 ❤️❤️

1d 2 likes Reply

avril.blethers Let them know we see them even if we can't get there. Solidarity with all those taking direct action.

1d 171 likes Reply

10,167 likes
1 day ago

Add a comment... Post

pal_action and **4 others**
Original audio

pal_action Actionists are STILL occupying the roof of Guardtech, suppliers to Israel's biggest weapons producer.

Support them at Unit 2-3 Highbury Road, Brandon, Suffolk, IP27 0ND!

23h

la_yan1469 ❤️👏👏👏👏🔥

23h 9 likes Reply

View replies (2)

khawlah_koala Hope you're staying as cool and hydrated up there as possible! You rock ❤️

23h 75 likes Reply

View replies (1)

plague_arcade We love you 💚💚💚💚💚💚💚💚💚💚💚💚

22h 15 likes Reply

ballaterbboy ❤️❤️PS✊❤️❤️

22h 5 likes Reply

View replies (1)

iamchrislindsay You're amazing. ❤️❤️❤️

23h 19 likes Reply

raghdaa_team Artist from the shadows... G A PS Just a bit

9,899 likes
23 hours ago

855

Add a comment...

Post

pal_action and 3 others
Suffolk, United Kingdom

pal_action Palestine Action is STILL on the roof of Guardtech, suppliers to Israel's biggest weapons producer.

Guardtech make and repair the cleanrooms needed by Elbit Systems to manufacture parts for Israeli weaponry used to massacre Palestinians.

Photos by @martin_pope_photographer

Edited · 17h

bigbabybea ❤️❤️❤️❤️❤️
17h 5 likes Reply

sunisgonnakeeponshining_xo The best of us 🤎 PS ❤️
17h 41 likes Reply

View replies (4)

dsag823 🙌🙌🙌
5h 1 like Reply

humantiproject Hero's
17h 11 likes Reply

ladygold.222 👏👏👏🔥🔥🔥
17h 4 likes Reply

rachaelgbournee Remarkable. Shut it down! ‼️
17h 26 likes Reply

14,416 likes
18 hours ago

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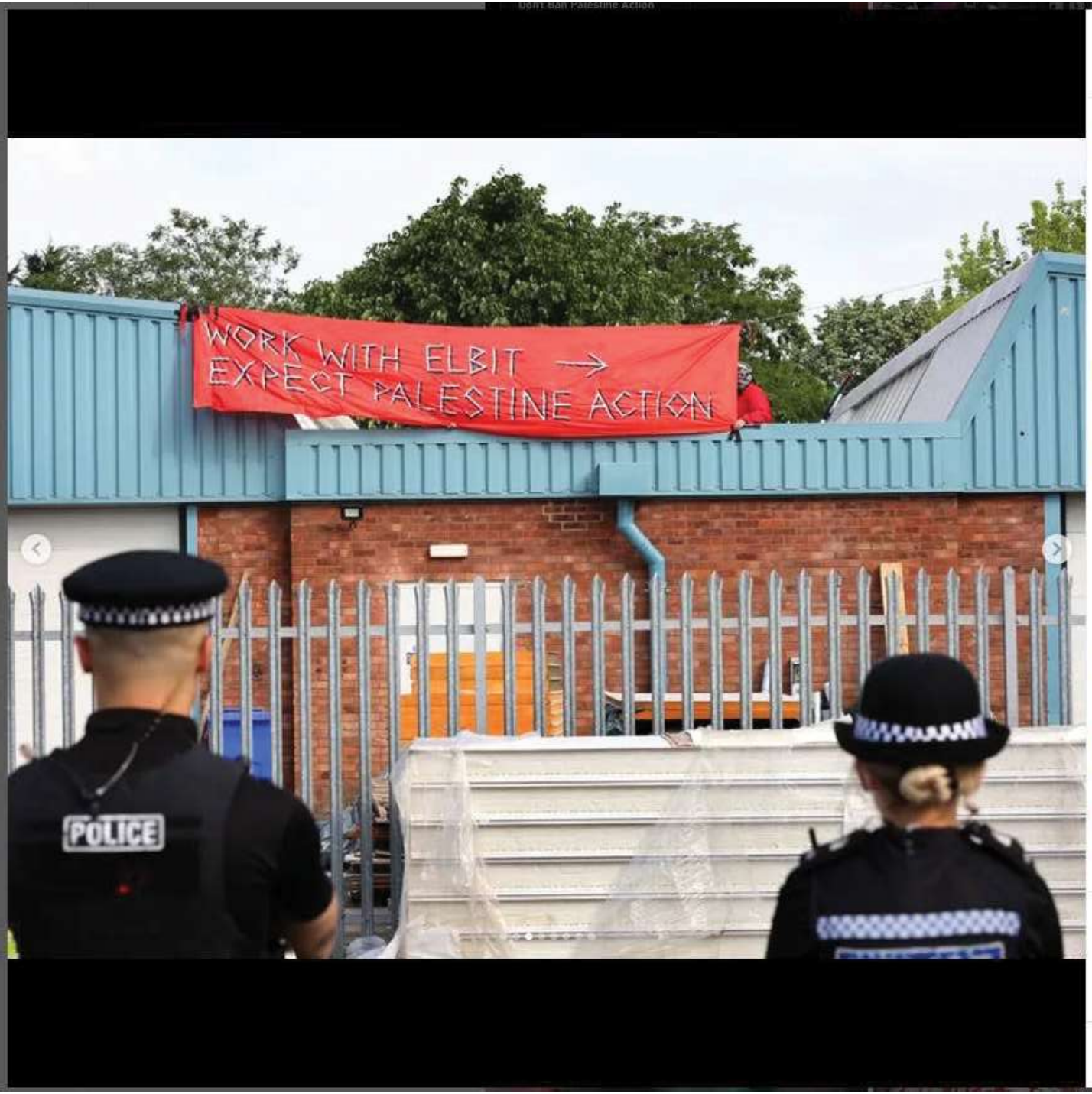

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18 hours ago

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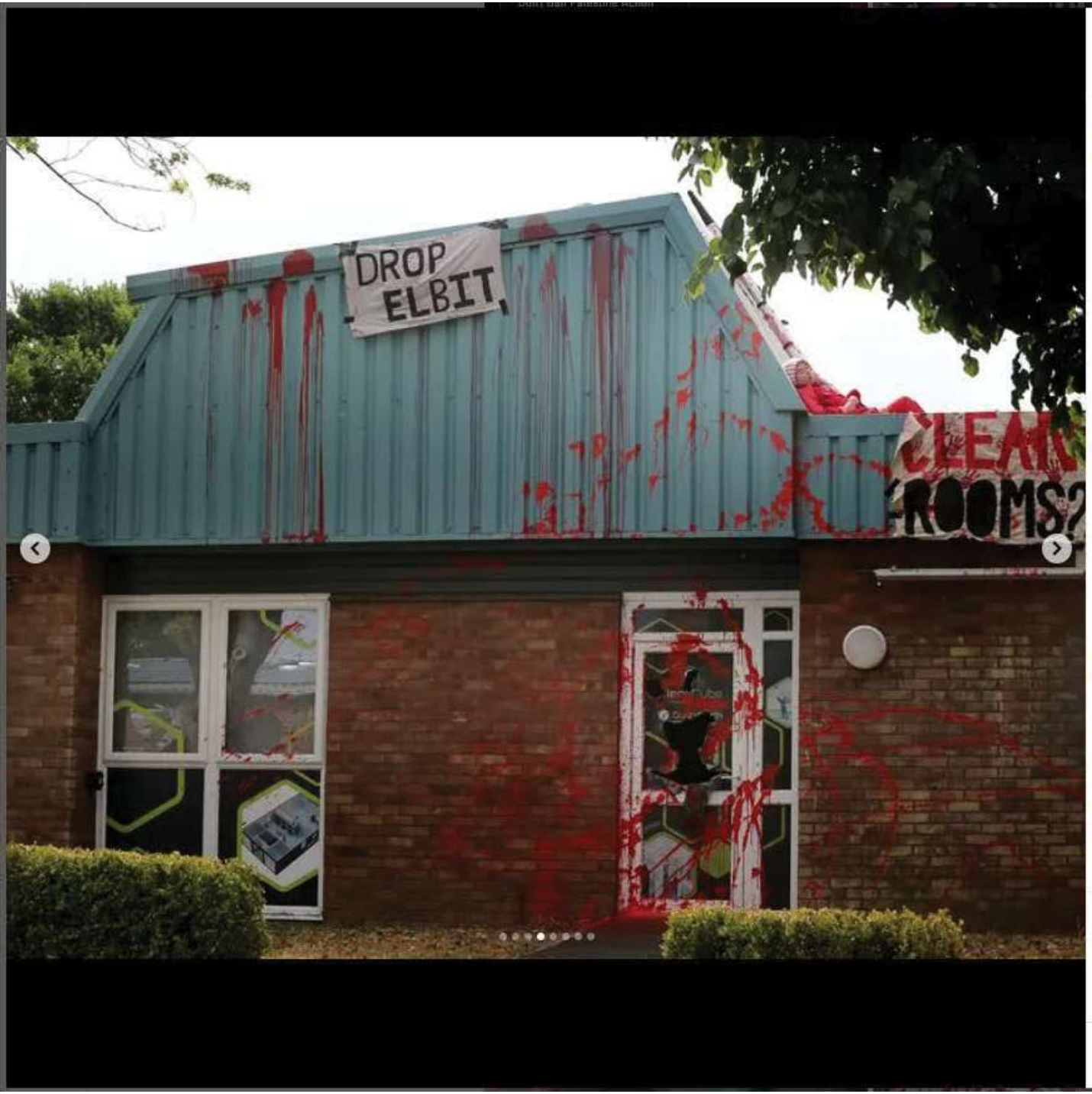

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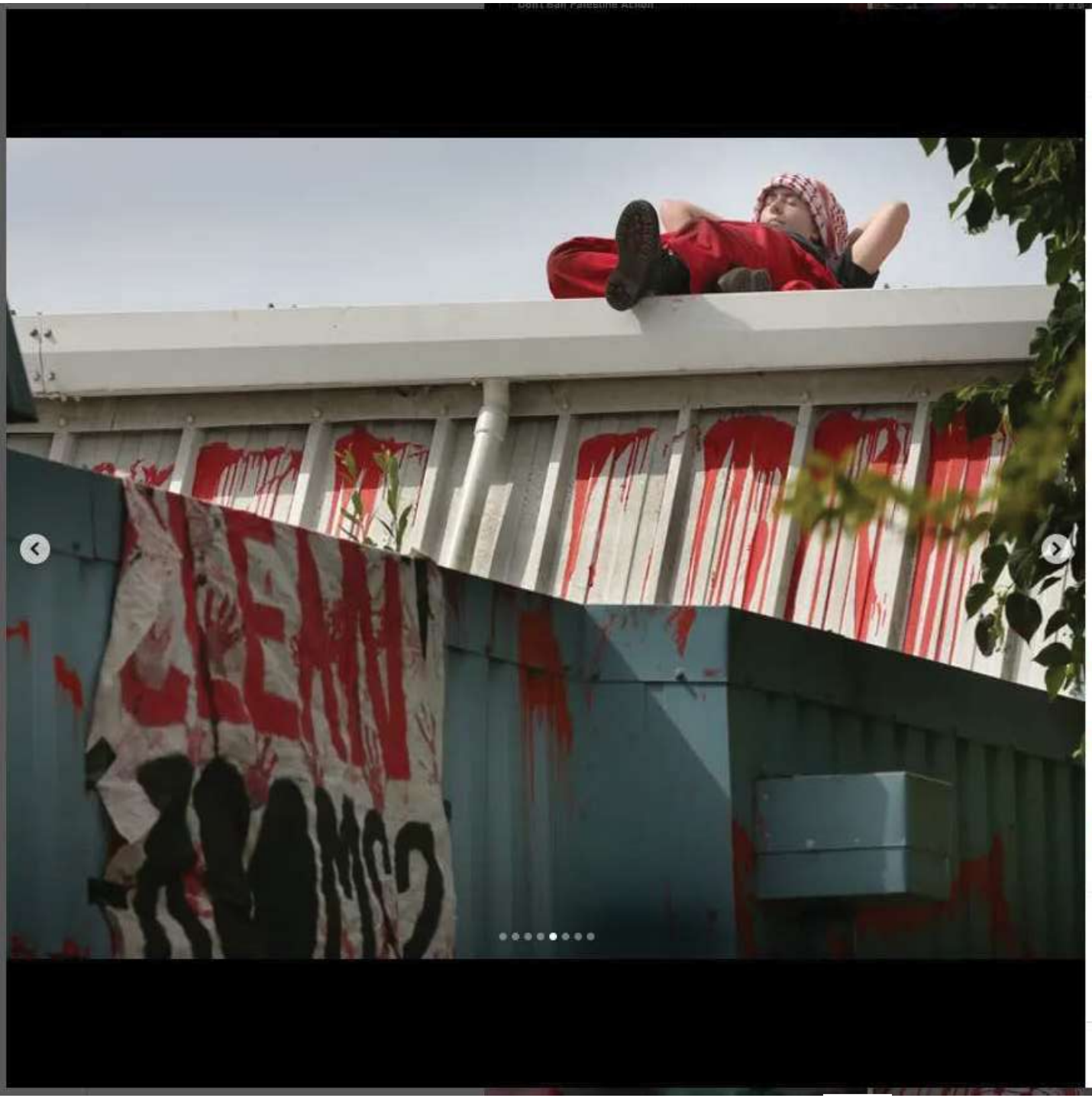

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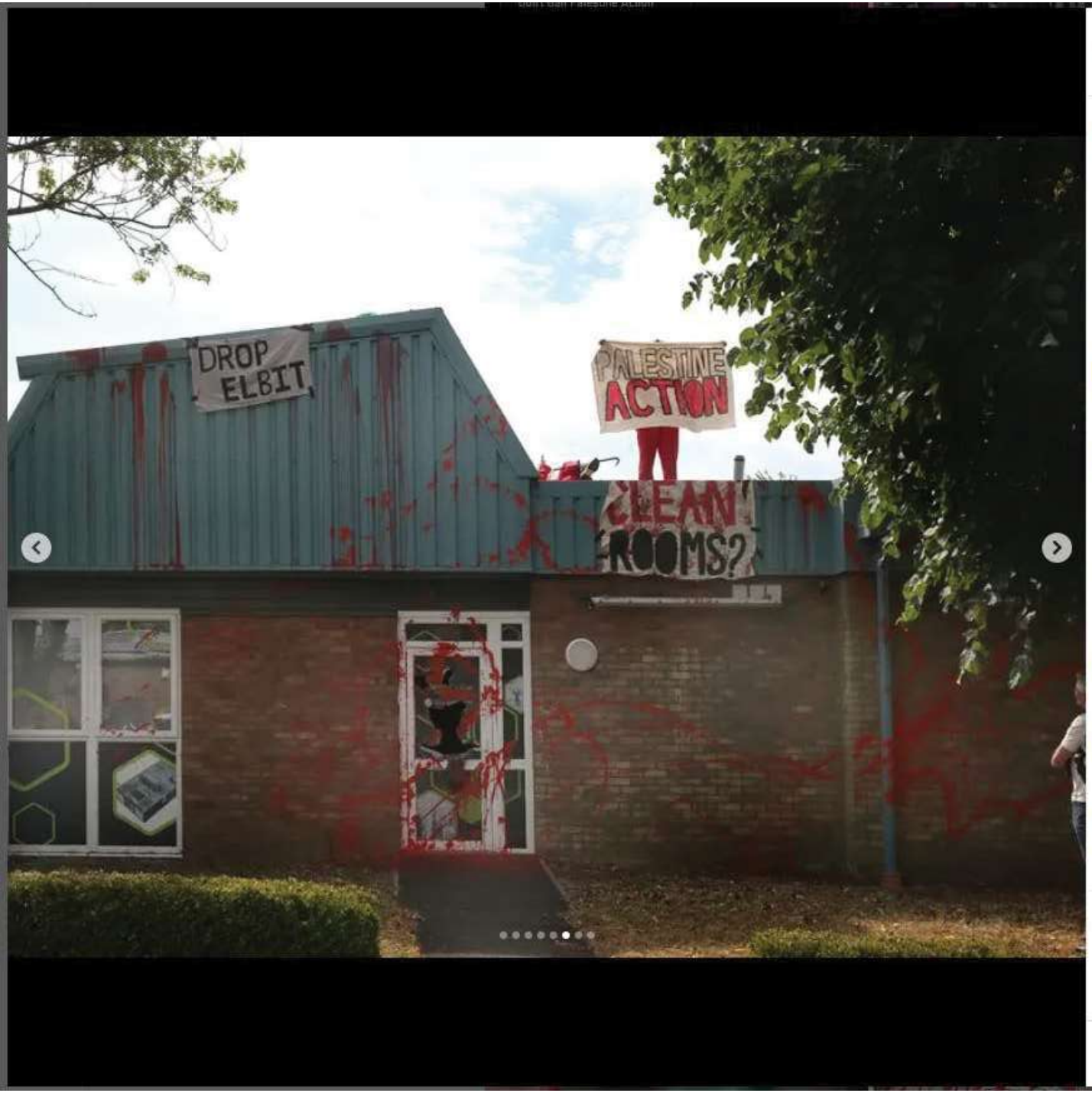

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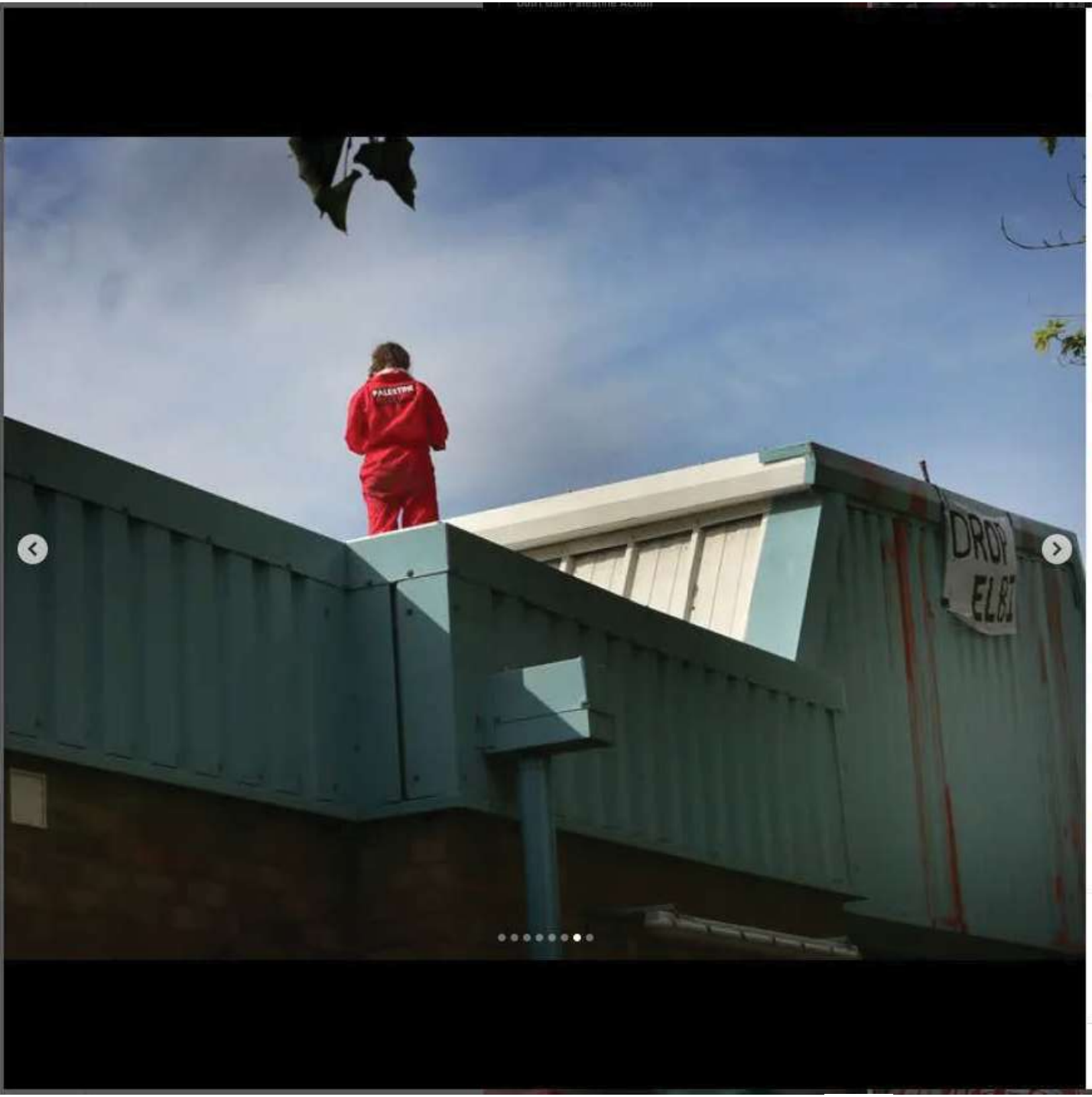

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14,318 likes
18 hours ago

Add a comment... Post

y.f.f.p and 4 others
Abe Batshon, Samer, Sammy Shiblaq • Palestine Will Rise (Instrumental)

y.f.f.p BREAKING: Free people of Manchester protested outside of Allianz offices today, the protective insurers of Israel's largest weapons manufacturer, Elbit Systems!

Today commemorates 58 years since the Naksa, another marker of the ongoing Israeli expansion and ethnic cleansing. The Naksa saw 6 days of brutal consolidation of settler colonialism over Palestinian lands. This is another of the steps that have lead to the genocide today, a genocide that Allianz funds.

Allianz directly profits from the murder of Palestinian people. Their money funds the drones, bombs and bullets massacring men, women and children in Palestine. We cannot stay silent as genocide profiteers operate on our doorsteps. Here in Britain we cannot stand by and allow our cities to house companies covered in the blood of Palestinians.

Forced starvation, genocide and murder trace a path of complicity across the world, a path that ends at Allianz's door, a path that ends at the door of every company supporting, enabling and protecting the genocidal Zionist entity.

We call on Allianz to cut all ties from Elbit systems and no longer profit from murder. We must not rest until active support of genocide is out of our cities!

2w

selmaekinci2019 👏👏👏👏
2w 2 likes Reply

hannahxmills ❤️
2w Reply

696 likes
June 5

Add a comment... Post

y.f.f.p and 2 others
Shabjdeed, Al Nather • Intro

y.f.f.p BREAKING: YFFP Birmingham and activists crash the offices of Allianz Insurance, a substantial shareholder and insurer of Elbit Systems – israel's largest weapons manufacturer.

In addition to its £655k of investments in the genocidal zionist machine, Allianz provides Employers Liability Insurance to Elbit Systems UK, through its subsidiary 'Allianz Insurance Products Trust'. Without Liability Insurance Elbit would not be able to carry on operating and building its mass murder machines in Britain.

Today we commemorate the Palestinian Naksa (setback), when the Zionist entity occupied the rest of Palestine after the Nakba and spread further corruption, displacement, and mass killing of the Palestinian people. We remember the Naksa as well as the Nakba, and the Zionist genocide of the Palestinian people that continues in its most horrific forms in Gaza today.

Allianz's shameful complicity and active participation in the slaughter and displacement of the Palestinian people is cannot go unnoticed any longer and will not go unaccounted. Palestinians are fighting their barbaric Zionist occupiers in Gaza and across Palestine, and therefore it is a duty we continue to support this struggle here in Britain by taking a stand, and our stand is taking action.

Today and everyday, we will hit Allianz and the complicit corporations where it hurts - their pockets. And while Allianz insures the soaked-in-blood Zionist machine, we will insure it has no moment of peace on our high streets and in our cities.

This is our globalised Intifada, and we won't set back until it fulfils the Palestinian people's demands and freedom.

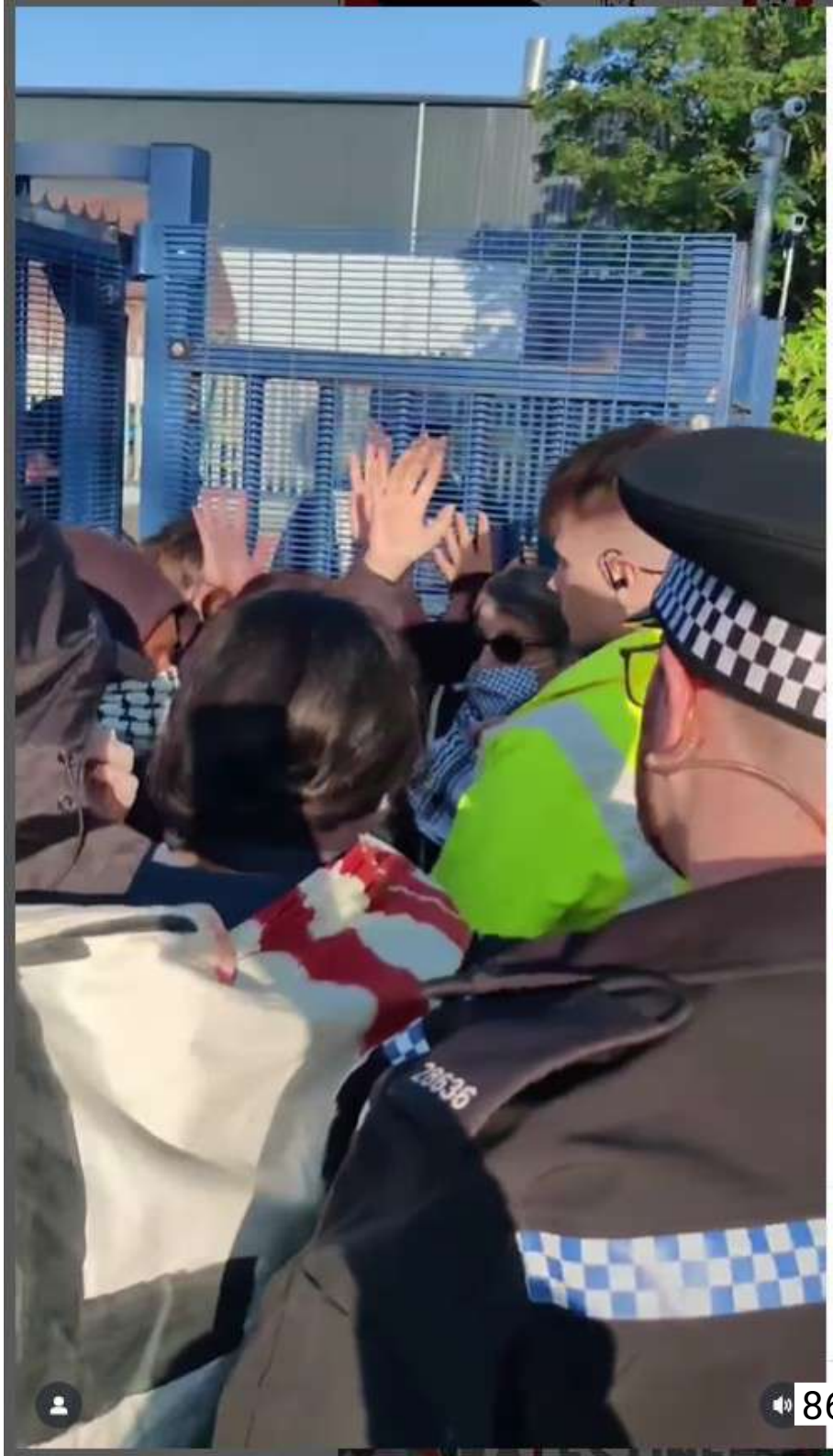
Long Live Palestine, and Long Live the Palestinian Intifada. PS

7,318 likes
June 5

865

Add a comment...

Post



y.f.f.p and 3 others
Original audio

y.f.f.p 🚨 Happening Now 🚨

ENGINES FOR GENOCIDE SHUT FOR TODAY!

Activists from around Britain are blockading the entrance to a UAV Engines site in Shenstone, near Birmingham.

UAV Engines Ltd, a subsidiary of Elbit Systems, manufactures the engines for the Hermes 450 drone and directly contributes to the genocide and occupation of the Palestinian people. The Hermes 450 Drone is a surveillance and missile carrying drone used by the israeli occupation forces (IOF) across occupied Palestine and was used by Britain during the US-led invasion of Iraq and Afghanistan to terrorise and brutally murder people. It is the same drone that has been used in the past week to attack the people and infrastructure of Iran.

We will continue to put popular and consistent pressure on UAV Engines, with one clear demand to SHUT ELBIT DOWN ‼️

2d

shortforjacket 👏

2d 1 like Reply

thanet4palestine Standing in Respect Solidarity with you every Day ✊ ❤️
Shut Them Down ps

2d 22 likes Reply

ladygold.222 👏👏👏👏👏👏🔥🔥🔥

2d 2 likes Reply

1,453 likes
2 days ago

866

Add a comment...

Post

PALESTINE ACTION DAMAGE MILITARY PLANES AT RAF BRIZE NORTON TO INTERVENE IN THE GENOCIDE

Jun 20, 2025

Images and videos are free to use, with credit to Palestine Action

Palestine Action have damaged two military planes at RAF Brize Norton, where flights leave daily for RAF Akrotiri in Cyprus, a base used for military operations in Gaza and across the Middle East. Two activists broke into the largest air force base in Britain and used electric scooters to swiftly manoeuvre towards the planes. They used repurposed fire extinguishers to spray red paint into the turbine engines of two Airbus Voyagers and caused further damage using crowbars. Red paint, symbolising Palestinian bloodshed was also sprayed across the runway and a Palestine flag was left on the scene. Both activists managed to evade security and arrest.

By putting the planes out of service, activists have interrupted Britain's direct participation in the commission of genocide and war crimes across the Middle East. From Akrotiri, the RAF have flown hundreds of surveillance missions in support of Israel's genocide in Gaza [1], and the base is also used for UK and US military cargo transports to the Israeli military [2]. In a speech to troops at Akrotiri in December 2024, Keir Starmer hailed the troops' efforts while stating that "Quite a bit of what goes on here can't necessarily be talked about [...] we can't necessarily tell the world what you're doing" [3]. By this point, Israel had massacred tens of thousands in Gaza, the Akrotiri base had been used to collected up-to 1,000 hours of reconnaissance footage over the Strip in assistance of Israel [4].

The targeted planes are Airbus Voyagers, which can carry military cargo and are used to refuel Israeli/US/UK military aircrafts and fighter jets. Previously, such Voyagers were used to refuel RAF Typhoon aircraft and US military planes for bombing runs against Yemen [5], where combined US-UK-Israeli airstrikes have killed hundreds of Yemenis [6][7]. Recently, British Airbus Voyagers have been seen flying over Jordan, Iraq and towards Syria, where they stop to refuel Israeli or US fighter jets for 4-5 hours and then return to Akrotiri.

From the military base, Airbus Atlas flights also travel to RAF Akrotiri. Atlas flights can carry soldiers, guns, ammunition, bombs and munitions. During the escalating genocide in Gaza, the British military have flown Atlas flights from Akrotiri to Tel Aviv, carrying soldiers and/or military cargo [8].

RAF Brize Norton, where the aircrafts are now grounded, has also played host to numerous Israel Air Force transport flights within recent months [9].

QUOTES

A Palestine Action spokesperson has stated:

"Despite publicly condemning the Israeli government, Britain continues to send military cargo, fly spy planes over Gaza and refuel US/Israeli fighter jets. Britain isn't just complicit, it's an active participant in the Gaza genocide and war crimes across the Middle East.

By decommissioning two military planes, Palestine Action have directly intervened to break the chains of oppression."

ENDS

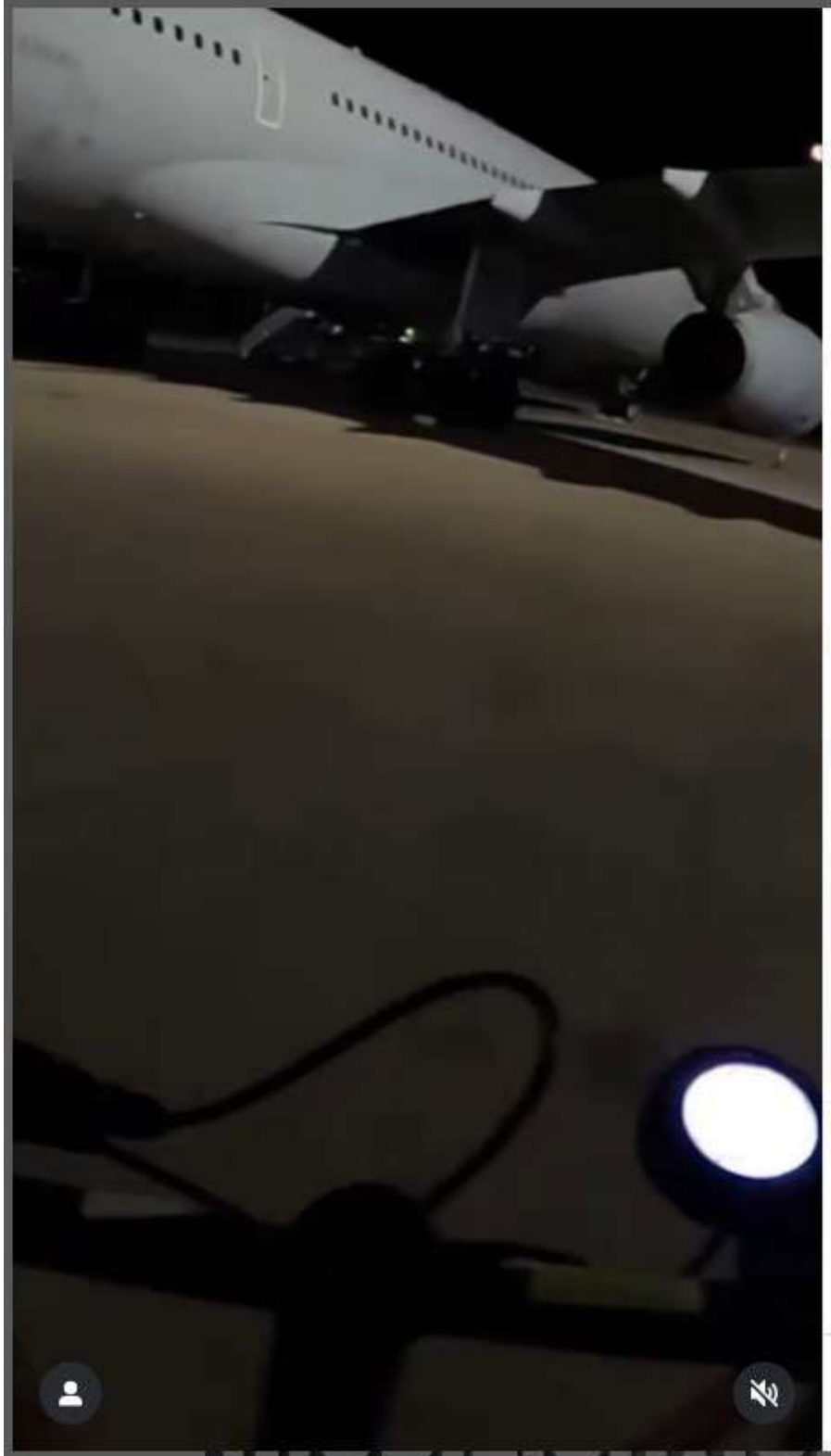
NOTES TO EDITORS

[1] https://aoav.org.uk/2025/britain-sent-over-500-spy-flights-to-gaza-aoav-study-reveals-the-scale-of-british-intelligence-gathering-above-gaza-raising-fears-of-complicity-in-israeli-war-crimes/
[2] https://www.declassifieduk.org/raf-admits-to-making-17-military-flights-to-israel-since-gaza-bombing-began/
[3] https://www.middleeasteye.net/news/starmer-visits-gaza-spy-planes-air-base
[4] https://www.aljazeera.com/news/2024/10/3/what-did-al-jazeeras-investigation-into-israeli-war-crimes-in-gaza-reveal
[5] https://www.key.aero/article/insight-raf-ops-response-gaza-war
[6] https://www.independent.co.uk/news/uk/home-news/david-lammy-israel-hamas-pat-mcfadden-rupa-huq-b2717203.html
[7] https://www.aljazeera.com/news/2025/4/14/us-attacks-on-yemen-killed-123-people-since-mid-march-health-authorities
[8] https://x.com/kennardmatt/status/1924374676286939484

[9] https://www.declassifieduk.org/why-have-israeli-military-aircraft-been-landing-at-a-uk-air-base/

Email *

SIGN UP



pal_action and **3 others**
Original audio

pal_action BREAKING: Palestine Action decommission two military aircrafts at RAF Brize Norton.

Flights leave daily from the base to RAF Akrotiri in Cyprus. From Cyprus, British planes collect intelligence, refuel fighter jets and transport weapons to commit genocide in Gaza.

Not only did actionists gain access to the military base, they also escaped undetected.

Britain isn't just complicit, it's a direct participant in the genocide in Gaza. But through direct action, we can break the chains of oppression.

Edited · 3d

61,141 likes
3 days ago

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Post

869

77

Security review launched after activists break into RAF base

Watch: BBC looks at how activists breached RAF base Brize Norton

Ruth Comerford
BBC News

Jonathan Beale
Defence correspondent

20 June 2025

A security review has been launched across UK military bases after pro-Palestinian activists broke into RAF Brize Norton and sprayed two military planes with red paint.

Prime Minister Sir Keir Starmer condemned the action as "disgraceful", saying it was an "act of vandalism".

Footage posted online by Palestine Action on Friday showed two people inside the Oxfordshire airbase in darkness, with one riding on a scooter up to an Airbus Voyager and spraying paint into its jet engine.

South East counter terrorism police later confirmed its specialist officers were investigating the incident alongside Thames Valley Police and the Ministry of Defence (MoD).

Downing Street said the incident had not blocked any planned aircraft movements or stopped any operations.

Defence Secretary John Healey said he was "really disturbed" by the incident and had ordered an investigation and the wider security review.

Palestine Action said the activists evaded security and claime[illegible]ad put the air-to-air refuelling tankers "out of service".

However, RAF engineers are assessing the damage and a defence source told the BBC they did not expect the incident to affect operations.

In a statement, a Palestine Action spokesperson said: "Despite publicly condemning the Israeli government, Britain continues to send military cargo, fly spy planes over Gaza and refuel US and Israeli fighter jets."

Counter-terror police said the incident happened in the early hours of Friday and added enquiries were "ongoing to establish the exact circumstances".

Thames Valley Police earlier said it had received a report about people gaining access to the base and causing criminal damage.

"Inquiries are ongoing to locate and arrest those responsible," the force said.

Red paint can be seen on parts of the plane

RAF Brize Norton serves as the hub for UK strategic air transport and refuelling, including flights to RAF Akrotiri in Cyprus. The air force has conducted reconnaissance flights over Gaza out of the Cyprus base.

The base is encircled by a large perimeter fence, with security camera and sensors in the area in addition to manned security checkpoints. Patrols around the base are also carried out from time to time.

But a defence source said these measures would not have been able to provide complete cover around the large airbase.

Palestine Action has engaged in similar activity since the start of the current war in Gaza, predominantly targeting arms companies. In May, it claimed responsibility for the daubing of a US military plane in Ireland.

The group said the activists who entered RAF Brize Norton used repurposed fire extinguishers to spray red paint into the planes' engines.

Footage posted by Palestine Action activists riding on scooters inside the Oxfordshire airbase

It also said they caused "further damage" using crowbars - though this is not visible in the bodycam footage it provided.

Video shows the activists then roaming around the airbase.

The protesters did not spray paint on the Vespina aircraft - used by the prime minister for international travel - which was also on the base.

The MoD told the BBC that RAF Voyager aircraft had not been involved in refuelling or supporting Israeli Air Force jets.

A spokesman said Voyagers have been used in the Middle East to refuel RAF Typhoon jets involved in the ongoing international efforts to tackle the so-called Islamic State group in eastern Iraq and Syria.

They have also been used in the Red Sea in the past in operations against Yemen's Houthi rebels.

Lord West, Labour minister for UK security and former head of the Royal Navy, said earlier that while he was not aware of the full details, the break-in was "extremely worrying".

"We can't allow thing like this to happen at all," he told BBC Radio 4's Today programme, adding that breaches like it were "really a problem" for national security.

Conservative leader Kemi Badenoch said the security breach was "deeply concerning".

"This is not lawful protest, it is politically motivated criminality," she said in a statement.

"We must stop tolerating terrorist or extremist groups that seek to undermine our society."

Greg Bagwell - a former RAF deputy commander - said that in targeting the Voyager, the activists picked "a strange target".

Air Marshall Bagwell, now a distinguished fellow at the Royal United Services Institute (Rusi), told the BBC "those aircraft do not do what these protesters think they do. They're largely used for moving passengers or fuel".

He added that Voyagers had "the wrong connectors" that would stop them being used to help refuel Israeli or US jets, as the action group suggested.

But he said if the activists "wanted to create an effect, they've clearly done that".

Shadow armed forces minister Mark Francois told the BBC any attempt to interfere with the engines of large aircraft was "totally reprehensible".

He added there were "serious questions for the MoD to answer" about how protesters were able to "gain access to what is supposed to be a secure RAF airbase".

The local Liberal Democrat MP Charlie Maynard described the activists' actions as "stupid and dangerous".

He said the investigations should establish "how this happened and what can be done in future to make sure no further breaches occur".

Additional reporting by Joe Inwood, world news correspondent

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Four arrested after RAF Brize Norton break-in

Ewan Somerville
BBC News

27 June 2025, 11:17 BST
Updated 43 minutes ago

Counter-terror police have arrested four people after military planes were sprayed with paint during a break-in at RAF Brize Norton that was claimed by a pro-Palestinian group.

Footage posted online last Friday by Palestine Action showed two people inside the Oxfordshire airbase in darkness, with one riding on a scooter up to an Airbus Voyager and spraying paint into its jet engine.

South East counter terrorism police have now arrested a 29-year-old woman of no fixed abode and two men, aged 36 and 24, both from London, on terror charges.

A 41-year-old woman, of no fixed abode, was arrested on suspicion of assisting an offender.

The suspects aged 24, 29 and 36 are suspected of "the commission, preparation or instigation of acts of terrorism, contrary to Section 41 of the Terrorism Act 2000", police said.

The arrests took place in Newbury, Berkshire, and all suspects remain in custody.

South East counter-terror police gave no further details about the individuals arrested, nor their suspected link to the incident.

The government has said it will proscribe Palestine Action following the incident at Brize Norton, making it illegal to be a member or invite support for the group.

Home Secretary Yvette Cooper said a draft proscription order would be laid before Parliament on 30 June.

Palestine Action said its activists were able to evade security and claimed they had put two air-to-air refuelling tankers "out of service".

The group said activists used repurposed fire extinguishers to spray the paint and caused "further damage" using crowbars.

However, Downing Street said the incident had not blocked any planned aircraft movements or stopped any operations.

The base is encircled by a large perimeter fence, with security camera and sensors in the area in addition to manned security checkpoints. Patrols around the base are also carried out from time to time.

But a defence source said these measures would not have been able to provide complete cover around the large airbase.

Defence Secretary John Healey said he was "really disturbed" by the incident and ordered a wider security review of all UK military bases.

Prime Minister Sir Keir Starmer condemned the break-in as "disgraceful", characterising it as an "act of vandalism".

RAF Brize Norton serves as the hub for UK strategic air transport and refuelling, including flights to RAF Akrotiri in Cyprus.

The air force has conducted reconnaissance flights over Gaza out of the Cyprus base, though the Ministry of Defence told the BBC that RAF Voyager aircraft had not been involved in refuelling or supporting Israeli Air Force jets.

A Palestine Action spokesperson said in a statement shortly after the break-in: "Despite publicly condemning the Israeli government, Britain continues to send military cargo, fly spy planes over Gaza and refuel US and Israeli fighter jets."

Police said the incident took place in the early hours of 20 June and that "damage was caused to two aircraft".

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COUNTER-TERRORISM POLICE ARREST FOUR PEOPLE AFTER RED PAINT SPRAYED ON MILITARY PLANES

Jun 27, 2025

Images available are free to use, with relevant credit

Counter-terrorism police have arrested four people in connection to the protest by Palestine Action at RAF Brize Norton, in which two activists on scooters spray painted two British military planes with red paint and evaded security and police.

Three have been arrested on suspicion of the commission, preparation or instigation of acts of terrorism. Another was arrested of assisting an offender.

The embarrassment caused to the government by the recent Palestine Action incursion at Brize Norton, has led rapidly to the announced proscription of

Palestine Action. Keir Starmer explicitly referred to the spray-painting of the planes as "vandalism", not 'terrorism' and many Parliamentarians including former Justice Secretary Lord Falconer, have stated that the protest may be criminal damage, but not terrorism.

Former First Minister of Scotland Humza Yousaf MSP writes in an opinion piece that "proscribing Palestine Action as a terrorist organisation is a shameful and dangerous misuse of anti-terror legislation by the UK Government". Leading legal and human rights organisations Amnesty UK and Liberty have described the threat to proscribe Palestine Action as "a shocking escalation of the Government's crackdown on protest" and have urged the Home Secretary to abandon the proposal.

Keir Starmer was directly involved in defending one of the Fairford Five, who attempted to put military aircraft at RAF Fairford out of action, at the start of the Iraq War in 2003. Starmer's client, who had planned to set fire to the planes, was acquitted after he argued that he was attempting to prevent an illegal war.

From 1981 to 2000, protestors disrupted RAF Greenham Common, frequently breaking into the grounds, by cutting or ripping down fences, and climbing on top of missile silos. In 2016 and 2017, activists from the Ploughshares movement disarmed war planes bound for Indonesia and Saudi Arabia, being acquitted in both cases. When protestors broke into RAF Mildenhall in 2017, and RAF Yeovilton in 2020, they were charged with trespass.

Today's arrest is the first time that counter-terror powers have been used in relation to a protest at a British military base. The use of counter-terrorism laws mean that anyone arrested will be kept incommunicado, potentially held in solitary confinement, and questioned, for several days, without being charged.

A spokesperson for Palestine Action said:

"The fact this arrest has taken place before the proposed proscription has been voted on, further demonstrates that proscription is not about enabling prosecutions under terrorism laws – it's about cracking down on non-violent protests which disrupt the flow of arms to Israel during its genocide in Palestine. Proscribing Palestine Action is a political gesture to satisfy pro-Israel groups and arms companies who have been lobbying for us to be banned because we're hitting their profits and having an real impact on Israel's war machine."

"In response to widespread condemnation of the Government's proposed proscription of Palestine Action from the leading human rights organisations among others, the Home Secretary claimed it was an accumulation of actions which led to her assessment rather than a knee-jerk reaction by a humiliated Government.

"However, this arrest confirms they are treating red paint on military planes as an act of terrorism, despite the fact that the same action by protesters for decades – including the protester Keir Starmer defended – has never been treated as terrorism. The only difference is that this time it was done for Palestine and this Government is in the pocket of the weapons companies arming Israel's war crimes."

At the time of the action, Palestine Action said:

"Despite publicly condemning the Israeli government, Britain continues to send military cargo, fly spy planes over Gaza and refuel US/Israeli fighter jets. Britain isn't just complicit, it's an active participant in the Gaza genocide and war crimes across the Middle East.

By decommissioning two military planes, Palestine Action have directly intervened in the genocide and prevented crimes against the Palestinian people."

ENDS

NOTES TO EDITORS:

Leading legal and human rights organisations Amnesty UK and Liberty have described the threat to proscribe Palestine Action as "a shocking escalation of the Government's crackdown on protest" and have urged the Home Secretary to rethink before potentially bringing this to Parliament.
See Amnesty and Liberty statements here –
https://x.com/amnestyuk/status/1936132832956469734?s=46
https://x.com/libertyhq/status/1936380707296682209?s=46

Former Labour Justice Secretary Lord Falconer has stated that the action at RAF Brize Norton would not justify proscription, and a number of MPs have already stated their opposition to the move. https://www.theguardian.com/uk-news/2025/jun/22/palestine-action-raf-base-vandalism-not-enough-legal-justification-ban-lord-falconer

Former First Minister of Scotland Hamza Yousaf MSP has written "proscribing Palestine Action as a terrorist organisation is a shameful and dangerous misuse of anti-terror legislation by the UK Government".

https://www.lbc.co.uk/opinion/views/palestine-action-not-a-terrorist-organisation/

Award winning author Sally Rooney has written an opinion piece in the Guardian saying "it's vital we fight this alarming attack on free speech", adding "I admire and support Palestine Action wholeheartedly – and I will continue to, whether that becomes a terrorist offence or not." https://www.theguardian.com/commentisfree/2025/jun/22/israel-palestine-action-uk-government-terrorism-sally-rooney

As legal and human rights experts have made clear, this would be an entirely unprecedented and extremely dangerous kneejerk reaction to rank protest groups who engage in non-violent direct action as "terrorists" and treat them the same as ISIS, National Action, or Boko Haram.

The non-violent action on Friday 20th June saw activists spray paint two RAF aircraft, which was the first time the group had taken any action regarding RAF or on British military land or infrastructure. There is a decades-long history of protest activity, including acts of trespass, criminal damage, sabotage, and more, by activists at British military sites – none of whom have been branded as "terrorists".

In 2004, Keir Starmer defended a man who broke into an RAF base and attempted to set fire to military aircraft, arguing in Court that the activists' actions were justified because they were to stop an 'illegal war.' Palestine Action now faces proscription for the same protest action which Starmer had defended as legal – this time using only paint, not fire. This would mean those who "join" or express support for Palestine Action could face sentences of up to 14 years in prison. In 2023, then Policing Minister Chris Philp stated that "Palestine Action does not meet the threshold for proscription as they do not commit, participate in, prepare for promote, encourage, or otherwise be concerned with acts of terrorism."

Examples of comments from MPs:

Many MPs have expressed their opposition, including Labour MPs. Some key examples:

Former Shadow Home Secretary Diane Abbott MP has tweeted today saying "the government seems confused between protest and terrorism. To clarify, what Israel is doing is terrorism. What Palestine Action is doing is protesting it." https://x.com/HackneyAbbott/status/1937082625505526245

Labour MP Jon Trickett tweeted saying Liberty is correct and that we must oppose this drive towards authoritarianism. https://x.com/jon_trickett/status/1936516227943264733?s=46

Labour MP Nadia Whittome has tweeted saying "targeting non-violent protesters in this way is a misuse of terrorism-related powers. It sets a dangerous precedent, which governments in future could further use against their critics." https://x.com/NadiaWhittomeMP/status/1937121833310212354?t=5fV0rId6IY-d34PURVaD4Q&s=19

Labour MP Richard Burgon has called this a "dangerous step" saying there is a "long tradition in our country of people using non-violent direct action to oppose war – like the women at the Greenham Common base."

Zarah Sultana, elected as a Labour MP, tweeted "In 2003, anti-war activists broke into RAF Fairford to stop US bombers heading to Iraq. Keir Starmer defended their actions and said it was justified to prevent war crimes. Now his government is banning Palestine Action for doing the same. The Prime Minister is a hypocrite." https://x.com/zarahsultana/status/1936723523818737956?s=46

Former Shadow Chancellor John McDonnell MP has tweeted saying “prosecuting Palestine Action protestors for criminal damage for paint spraying at the airbase would be expected but putting them on a par with mass killers like Jihadis & Boko Haram & proscribing doesn’t seem appropriate & not what the counter terrorism laws were introduced for.”
https://x.com/johnmcdonnellmp/status/1936518364261671201?s=48

If you would like any further information on Palestine action, please contact media@palestineaction.org

Palestine Action is a direct-action network of groups and individuals formed with the mandate of taking action against the sites of Elbit Systems and other companies complicit in Israeli apartheid, calling for all such sites to be shut down.

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Two more people arrested over damage to aircraft at RAF base

Palestine Action has claimed responsibility for damage to two aircraft at RAF Brize Norton in Oxfordshire on 20 June. Sir Keir Starmer condemned the "act of vandalism" as "disgraceful".

Saturday 28 June 2025 23:09, UK

Activists infiltrate RAF base

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Two more people have been arrested on suspicion of a terror offence after two aircraft were vandalised at RAF Brize Norton in Oxfordshire.

Counter Terrorism Policing South East said the men, aged 22 and 24 and both from London, were arrested on Saturday afternoon on suspicion of the commission, preparation or instigation of acts of terrorism, contrary to Section 41 of the Terrorism Act 2000.

On Thursday, police said a woman, aged 29 of no fixed address, and two men, aged 36 and 24 from London, had been taken into police custody after the incident at RAF Brize Norton on 20 June.

Damage to planes at Brize Norton

A 41-year-old woman, of no fixed address, was also arrested on suspicion of assisting an offender, they previously said.

Read more:

What does proscription mean?

Palestine Action supporters defiant as group faces ban

The 'enemy within' or non-violent protesters?

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The group posted a video online claiming it was behind the **vandalism at the Oxfordshire airbase** last Friday, saying activists had damaged two military planes at the base.

Palestine Action - which focuses its campaigns on multinational arms dealers and has previously **targeted corporate banks** - said two activists "broke into the largest air force base in Britain and used electric scooters to swiftly manoeuvre towards the planes".

Palestine Action protests over ban

Repurposed fire extinguishers were used to spray red paint into the turbine engines of two Airbus Voyagers, while further damage was made using crowbars.

"Red paint, symbolising Palestinian bloodshed was also sprayed across the runway and a Palestine flag was left on the scene," a statement by the group said.

Brize Norton is the largest RAF station, with approximately 5,800 service personnel, 300 civilian staff and 1,200 contractors.

A security review was launched across the "whole defence estate" following the breach, which was condemned as "absolutely staggering" by Ben Obese-Jecty, a Tory MP and former Army officer.

Sir Keir Starmer condemned the "act of vandalism" as "disgraceful", adding: "Our Armed Forces represent the very best of Britain and put their lives on the line for us every day. It is our responsibility to support those who defend us."

Home Secretary Yvette Cooper said on Monday that Palestine Action will be proscribed as a terrorist organisation following the breach at RAF Brize Norton.

She said a draft proscription order will be laid in parliament next week, and if passed, it will make it illegal to be a member of, or invite support for, Palestine Action.

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The Terrorism Act 2000 (Proscribed Organisations) (Amendment) Order 2025

Draft Legislation:
This is a draft item of legislation and has not yet been made as a UK Statutory Instrument.

Draft Order laid before Parliament under section 123(4)(a) of the Terrorism Act 2000 (c.11), for approval by resolution of each House of Parliament.

DRAFT STATUTORY INSTRUMENTS

2025 No.

PREVENTION AND SUPPRESSION OF TERRORISM

The Terrorism Act 2000 (Proscribed Organisations) (Amendment) Order 2025

Made

Coming into force in accordance with article 1(2)

The Secretary of State makes this Order in exercise of the powers conferred by section 3(3)(a) and (c) of the Terrorism Act 2000(**1**).

The Secretary of State believes that the organisations to be added to Schedule 2 to that Act by article 2 of this Order are concerned in terrorism(**2**).

In accordance with section 123(4)(a) of that Act, a draft of this Order has been laid before and approved by a resolution of each House of Parliament.

Citation, commencement and extent

1.—(1) This Order may be cited as the Terrorism Act 2000 (Proscribed Organisations) (Amendment) Order 2025.

(2) This Order comes into force on the day after the day on which it is made.

(3) This Order extends to the United Kingdom.

Proscribed Organisations

2. In Schedule 2 to the Terrorism Act 2000 (proscribed organisations), after the entry for "Terrorgram collective"(3), insert—

"Palestine Action

Maniacs Murder Cult (MMC) (MKU) (MKY)

Russian Imperial Movement (RIM) (RID), including Russian Imperial Legion (RIL)".

Note on Proscribed Organisation

3. In Schedule 2 to the Terrorism Act 2000 (proscribed organisations), at the end of the note to the Schedule, insert—

"The entry for Palestine Action refers to the organisation using that name that is based in the United Kingdom.".

Minister of State
Home Office

EXPLANATORY NOTE

(This note is not part of the Order)

Part 2 of the Terrorism Act 2000 (c. 11) makes provision for proscribed organisations (including setting out offences in relation to such organisations in sections 11 to 13). An organisation is proscribed if it is listed in Schedule 2 to that Act ("Schedule 2") or, in most cases, it operates under the same name as an organisation so listed (section 3(1)).

Article 2 of this Order adds Palestine Action, Maniacs Murder Cult and Russian Imperial Movement to the list in Schedule 2 as new entries.

Article 3 of this Order adds a note to Schedule 2 providing that the entry for the first organisation added to Schedule 2 by article 2 of this Order is the organisation using that name that is based in the United Kingdom.

A full impact assessment has not been produced for this instrument as no, or no significant, impact on the private, voluntary or public sectors is foreseen.

---

(1) 2000 c. 11.

(2) "Terrorism" has the meaning given by section 1(1) of the Terrorism Act 2000, and section 1(1) was amended by the Terrorism Act 2006 (c. 11) and the Counter-Terrorism Act 2008 (c. 28).

(3) The entry for Terrorgram collective was inserted by S.I. 2024/569.

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July 2, 2025

Huda Ammori -v- Secretary of State for the Home Department (order)

Administrative Court (https://www.judiciary.uk/subjects/administrative-court/)

High Court (https://www.judiciary.uk/subjects/high-court/)

King's Bench Division (https://www.judiciary.uk/subjects/kings-bench-division/)

Order (https://www.judiciary.uk/judgment-types/order/)

Case number: AC-2025-LON-002122

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

1 July 2025

Before:

The Hon. Mr Justice Chamberlain

Between:

The King
on the application of
Huda Ammori

-v-

Secretary of State for the Home Department

Order

UPON the Claimant's application for judicial review dated 27 June 2025;

AND UPON the Claimant's urgent application for interim relief dated 27 June 2025 ("the interim relief application");

AND UPON hearing leading counsel for the Claimant and leading counsel for the Defendant at a case management hearing on 30 June 2025;

IT IS ORDERED THAT:

Interim Relief Application

1. The interim relief application is to be determined after a hearing at 10.30am on Friday 4 July 2025, with a time estimate of 3 hours (not including judgment).
2. The Defendant must file any evidence and submissions (to stand as a skeleton argument) in respect of the interim relief application by 4pm on Tuesday 1 July 2025.
3. The submissions filed pursuant to paragraph 2 above must address inter alia the form of interim relief which the Defendant considers would be effective to suspend the effect of any order to proscribe Palestine Action made prior to the hearing of the interim relief application.

4. The Claimant must file any reply evidence and updated submissions (to stand as a skeleton argument) in respect of the interim relief application by 4pm on Wednesday 2 July 2025.

5. The parties are to agree the contents of a paginated and indexed bundle containing all relevant documents required for the hearing, and of a paginated and indexed bundle containing all authorities on which the parties intend to rely. This is to be filed in electronic and hard copy form, in accordance with the guidance in the Administrative Court Judicial Review Guide, by 12 noon Thursday 3 July 2025.
6. Any requests for directions concerning the transmission of the hearing of the interim relief application are to be received by 4pm Thursday 3 July 2025.
7. Any application by a non-party under CPR 5.4C(2) for permission to obtain from the records of the Court a copy of documents filed in these proceedings prior to the hearing of the interim relief application:
(a) must be sent to the Administrative Court, copied to the Clerk to Mr Justice Chamberlain at Danielle.Jarvis@justice.gov.uk; and
(b) the Defendant must make any submissions in response to the application within 3 hours of receiving the application.

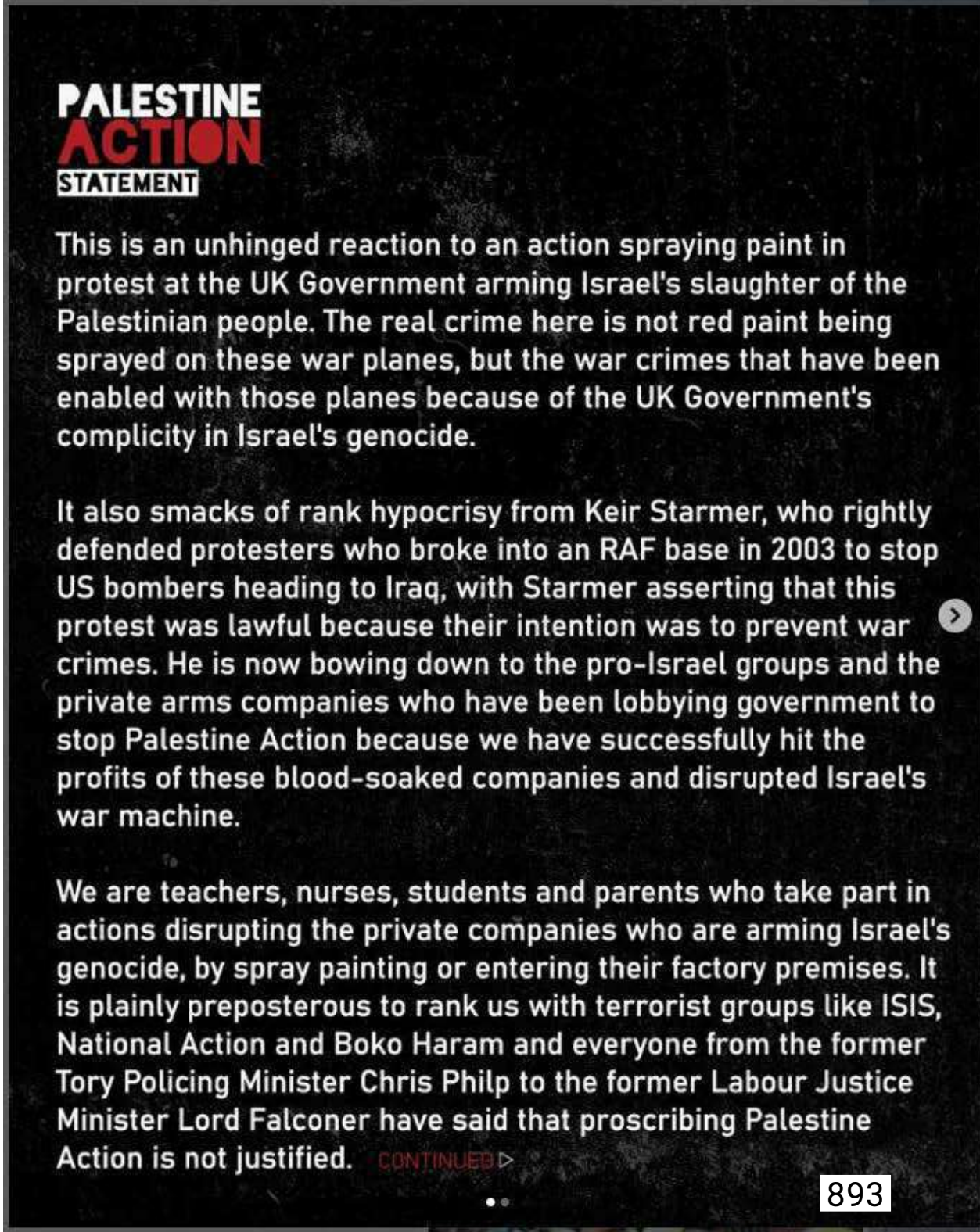
Further directions

8. A hearing to determine whether to grant permission to apply for judicial review is to be listed on a date to be fixed in the week commencing 21 July 2025, after consultation with counsels' clerks, with a time estimate of 1 day.
9. At the same time as filing submissions pursuant to paragraph 2 above, the Defendant must:
(a) indicate whether the Defendant intends to make any application for a declaration under section 6 of the Justice and Security Act 2013 and for permission under section 8; and
(b) if such an application is to be made, propose a timetable for the making and hearing of that application.

Liberty to apply and costs

10. The parties have liberty to apply.
11. Costs in the interim relief application.

Approved on 1 July 2025
BY THE COURT



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doctor.rahmeh We support you now and forever. Resistance till liberation PS ✊
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PALESTINE ACTION STATEMENT

CONTINUED ▷

As leading legal and human rights organisations Amnesty UK and Liberty have stated, proscribing Palestine Action is a shocking and unacceptable escalation of the Government's crackdown on the right to protest in our country. Future generations will look at the people who stood up the UK Government's complicity in this genocide as being on the right side history. We have a long, proud history of direct action, from the suffragettes to Nelson Mandela and others, who were called 'terrorists' at the time.

The Home Secretary's statement makes a series of categorically false claims which have been made by the pro-Israel groups which lobbied the government to proscribe us. We have instructed lawyers who are pursuing all avenues for legal challenge.

We echo the call made by world renowned writer Sally Rooney on everyone who opposes Israel's genocide to express your support for Palestine Action and your solidarity, to show how unworkable this absurd, unacceptable attack on free speech is.

894

pal_action and cageinternational

pal_action Palestine Action response to the Home Secretary's statement on proscribing us.
1d

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Fight the Proscription of Palestine Action

by **Palestine Action**

Judicial review

Lawyers: Birnberg Peirce

United Kingdom

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pal_action and 2 others

pal_action Palestine Action has instructed lawyers who will fight against the Home Secretary's attempt to ban our movement.

Contribute to the legal fundraiser to help us stop the proscription.

If we are proscribed, we may be restricted from fundraising for legal fees to be de-proscribed.

So please share this far and wide to help us raise the money as soon as possible!

Donate at crowdjustice.com/case/palestine-action

Edited · 21h

sydsleeper 💚🖤💚🖤💚

20h Reply

liltraceyb ❤️🙌

20h Reply

ndschris I can't wait to see Pal Action defeat the UK government in the courts ✊

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by **Palestine Action**

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Palestine Action
Case Owner

A direct action network crowdfunding to fight proscription

About the case

The Home Secretary has announced her plans to proscribe Palestine Action as a terrorist organisation, which would be an unprecedented attack on civil liberties and the right to protest.

What is Palestine Action?

Palestine Action is a network of activists which have used direct action to expose and target property and premises connected to war crimes in Palestine. It was formed approximately 5 years ago and has used a range of tactics, including direct action, to disrupt the operations of Elbit Systems, Israel's largest arms firm. Elbit Systems is directly implicated in grave crimes against Palestinians including offences under the International Criminal Courts Act 2003.

The campaign to proscribe Palestine Action

For years, pro-Israel lobby groups, the Israeli government and Elbit Systems have been lobbying for repressive treatment of Palestine Action. Just days before government sources told the press of their intentions to ban the direct-action group, 'We Believe in Israel' released a report and 'Campaign Against Antisemitism' wrote to the Home Secretary asking for her to proscribe us.

Now, the Home Secretary is trying to rush through a vote in Parliament to make joining or supporting Palestine Action **a terrorist offence**. If they're successful, it would rank Palestine Action amongst ISIS and National Action, despite our actions being in line with a long history of direct-action protests targeting property and weapons linked to war crimes.

The legal fight back

Palestine Action has received an outpouring of support in response to the government's attempts to proscribe us for which, we couldn't be more grateful.

We hope you will support us in fighting this draconian attack on our movement.

Gareth Peirce from Birnberg Peirce Solicitors has been instructed to fight the proscription process, assisted by Kellys

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Challenge the Proscription of Palestine Action

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on 24th June 2025

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Judicial review Lawyers: Birnberg Peirce United Kingdom

About the case

This project is raising funds for the legal costs incurred in bringing a challenge to the proscription of Palestine Action. Birnberg Peirce Ltd are instructed as solicitors to bring this challenge; raised funds are transferred directly to the firm's account.

The legal costs incurred are in relation to proceedings challenging the proscription of Palestine Action by the Home Secretary (the course of the proceedings to be followed is in accordance with the Order of the High Court dated July 1st, 2025").

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Exposed: Where Palestine Action plans to strike next

Telegraph uncovers major recruitment drive days before group is proscribed as terrorist organisation

3062 Gift this article free

Will Bolton
Crime correspondent
26 June 2025 5:51pm BST

Palestine Action is preparing to attack targets across the country including RAF bases and a drone factory.

In a meeting recorded by Telegraph reporters, the group outlined a list of new targets after its members damaged planes during a break-in at RAF Brize Norton last week.

Palestine Action has launched a major recruitment drive just days before it is officially proscribed as a terrorist organisation, putting it on a par with Hamas, al-Qaeda and Islamic State.

The Telegraph was able to access one of its online meetings and can, for the first time, disclose details about the group's secretive structure, its new focus on covert action, and advice given to members on exploiting the legal aid system following any arrest.

The meeting's organiser boasted that its activists ranged from "nursery teachers to surgeons", aged from 18 to 80.

Tactics discussed included breaking into factories and hitting "everything you can find with a sledgehammer", as well as how to set up autonomous cells able to target military bases without detection.

A slide in the call identified three RAF bases most suitable for attack: RAF Cranwell and RAF Barkston Heath, both in Lincolnshire, and RAF Valley, in Anglesey, North Wales. It also recommended action against defence companies believed to be supplying arms to Israel, including a drone factory in Leicester.

Palestine Action targets

RAF Valley

Home to No 4 Flying Training School, responsible for training the UK's next generation of fighter pilots

The Telegraph has shared details of the plans with police and the Ministry of Defence.

Palestine Action triggered a major security review of military bases after breaking into Brize Norton, where it sprayed red paint on two military planes and potentially caused millions of pounds of damage.

Yvette Cooper, the Home Secretary, called the attack “disgraceful” and vowed to proscribe the group. Palestine Action said it would mount a legal challenge against that decision.

In the wake of the announcement, the group has been carrying out an intensive series of recruitment workshops in an attempt to build a network of autonomous cells across the country that will target military bases.

RAF Cranwell was the world’s first Air Academy and it continues to select and train the next generation of RAF officers. RAF Barkston Heath is a relief landing ground for RAF Cranwell and is the home of 57 Sqn’s B Flight of No 3 Flying Training School. RAF Valley on Anglesey is home to No 4 Flying Training School, responsible for training the UK’s next generation of fighter pilots.

© OpenStreetMap contributors

All three bases are said by Palestine Action to have links to Elbit Systems UK, a military manufacturer that has been repeatedly targeted by the group.

Other targets listed included UAV Tactical Systems, a drone company owned by Elbit.

At the start of the online “direct action workshop”, an unidentified female activist told the group of around 50 potential recruits that they would be required to make “sacrifices” for the cause.

The participants were told they would be part of a new, sustained wave of attacks targeting military bases.

The organiser said that the proposed proscription was “draconian and dangerous” and Palestine Action would “continue to operate” even if designated as a terror group.

She was standing in front of a flag associated with the YPJ an all-female militia involved in the Syrian civil war whose members are mostly Kurdish.

New members were asked to download the encrypted messaging app Signal and were told they would be messaged by anonymous organisers at some point after the workshop.

After being contacted, the new recruits would be divided into cells which could plot their own actions.

Among those said to be in the meeting were university lecturers and a clergyman.

Instructions to download Signal, create a unique username and send it discreetly to a member of Palestine Action proved a struggle for some of the older participants.

The division of the groups into individual autonomous units is a deliberate strategy to prevent leaders of the organisation being arrested in connection with various plots, as has happened in the case of other protest groups, such as Extinction Rebellion.

In an article published in April, Huda Ammori, the group's co-founder, said it had deliberately been structured to prevent those in leadership roles from being detained.

She said: "By being security-conscious and working in small groups, we can make it difficult for the authorities to respond to individual actions by targeting the movement as a whole – such that Palestine Action can continue to grow, even in hostile conditions."

Ms Ammori, who previously supported the Palestine Solidarity Campaign, founded the group in 2020 alongside Richard Barnard, 51, a former member of Extinction Rebellion.

The 31-year-old was born in Bolton to a Palestinian father, a surgeon, and an Iraqi mother. She graduated from the University of Manchester with an international business and finance degree.

Legal warnings

The recruits were told that they must be aware of the legal ramifications of their actions, but were advised they could benefit from a free lawyer under government rules if arrested.

The group was shown a list of the potential punishments they could receive for specific actions.

For a “locking offence”, where one locks themselves onto property and refuses to move, they could expect up to six months in prison.

Aggravated trespass would lead to three months and a £2,500 fine, as would causing criminal damage under £5,000.

Criminal damage that was over £5,000 could lead to a 10-year sentence, while burglary charges would lead to a similar sentence.

The organiser said: “The conviction and courage it takes to take this action in the first place is accepting that level of sacrifice.”

She said there were currently 19 members of the group in prison and boasted that activists consisted of everyone from “nursery teachers to surgeons” and “from 18 to 80-year-olds”.

She added: “As much as we can stand by our morals and our ethics, we have to know for a fact we have to be well informed that there are risks that we are taking – that is both legal consequences especially as time has gone on, things have gotten worse in the legal framework and what results we are getting in the courtrooms, but also psychologically and financially.”

The organiser did not mention the fact that if Palestine Action is proscribed, anyone who is a member of the group or expresses support for it would face sentences of up to 14 years in prison.

All of the recruits were read out an “actions agreement”, in which it was stated: “Each individual takes part in the movement from their own free will.

“We encourage all to join but we do not pressure people into doing things that make them uncomfortable.”

Recruits were warned that if they were arrested, Palestine Action would not pay their legal fees but would offer “support”.

An “arrest support group” would be on hand to help those detained and recruits were told that if they did not have enough money to pay legal costs, they could rely on legal aid.

The organiser said: “We do not use duty solicitors. [Our lawyers] will apply for legal aid on your behalf if eligible.

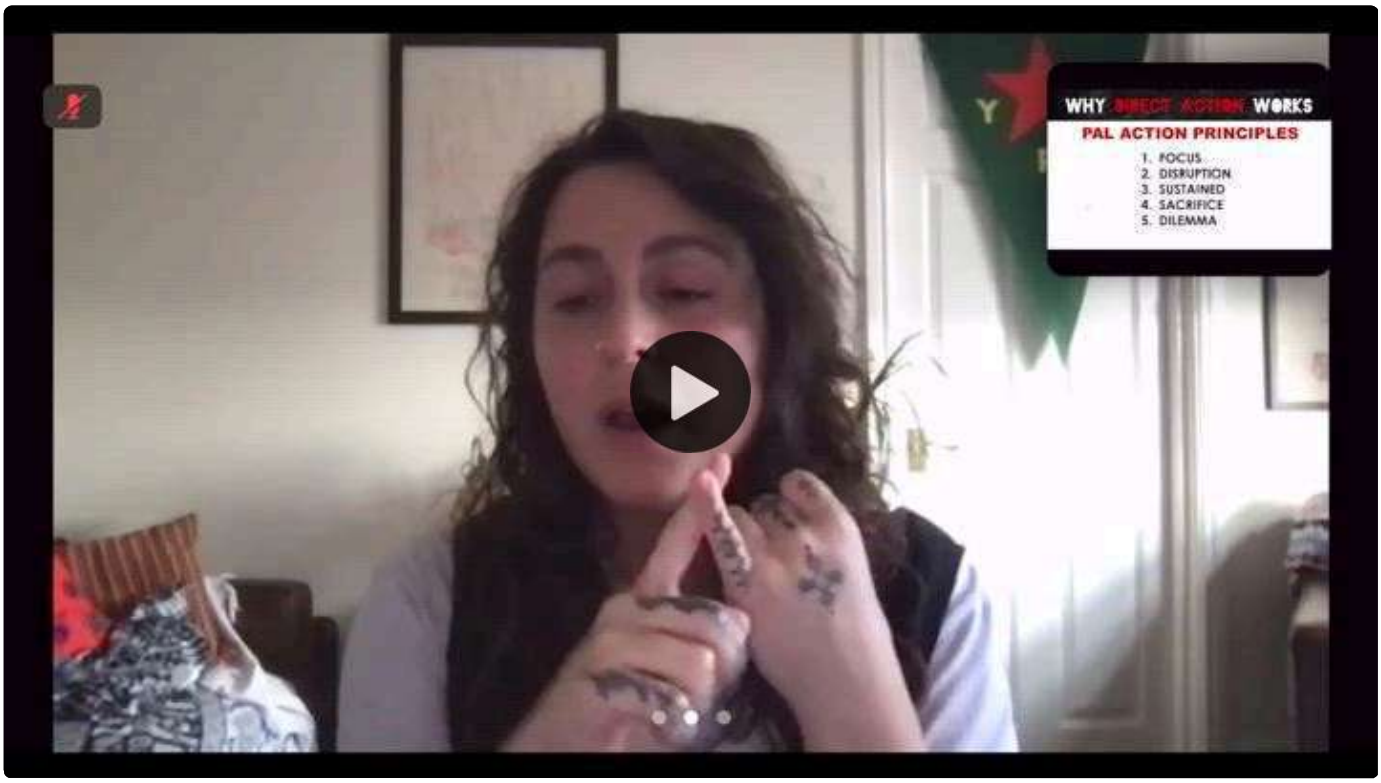
“And everybody, as I said, even if you’re a millionaire, you get free legal advice in the police station.”

Covert action

Outlining the various strategies for attacking targets, the organiser said that the plan was to carry out sustained, serious disruption.

In the past the group had focused on carrying out “accountable” attacks with the aim of getting caught and raising publicity.

The focus for the new recruits is on carrying out covert actions and escaping undetected. They were told not to take phones on raids and to hand over their belongings to neighbours in case their homes were searched if they were arrested.



The organiser said: “There is obviously a risk of getting arrested but the aim is not to get arrested.

“It means covering up anything that might make you identifiable, doing the action at a certain time, making sure it is as quick as possible, and essentially trying to get away at the end of it.”

She said that the actions could be categorised as low risk, mid risk, high risk and extra high risk.

She added: “Essentially, whether it’s locking yourself on, whether it’s getting up on a factory and, starting to hit everything that you can find with the sledgehammer and everything in between, whether it’s being in front of the gates... we’ve seen so many examples of this, there are so many different ways of disrupting.”

The recruits were told not to speak about actions to anyone outside the group or to share the identity of anyone participating in attacks.

“We do not provide police with any information that may compromise activists, actions or the movement... cause comes first”, the organiser added.

RECOMMENDED
Palestine Action: We're spreading 'intifada' in prisons

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A Ministry of Defence spokesman said: “The UK’s defence estate is vital to our national security and this government will not tolerate those who put that security at risk.

“This Government is taking the strong step of proscribing Palestine Action due to its activities, which are a threat to our national security.”

A spokesman for North Wales Police said: “Our officers continue to liaise with MoD staff in relation to security matters at RAF Valley, Anglesey.

“The emergence of potential threats to the site is recognised, with the need for additional policing and security patrols kept under regular review.”

Lincolnshire Police has been contacted for comment.

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Will Bolton
Crime correspondent
26 June 2025 5:51pm BST

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WE ARE ALL PALESTINE ACTION

Jun 23, 2025

Monday 23rd June 2025

Following the spray-painting of two British war planes at RAF Brize Norton on Friday, Home Secretary Yvette Cooper made the dramatic announcement that she planned to initiate the proscription of Palestine Action in Parliament today. The attempt to ban a political protest group, and effectively brand them a 'terrorist' organisation, is unprecedented.

Civil liberties organisations and campaign groups immediately issued strong statements condemning the move. Liberty said, *"Targeting a protest group with terrorism powers in this way is a shocking escalation of the Government's crackdown on protest, and we urge the Home Secretary to rethink.This move would be a huge step change in how counter-terror laws are applied. The actions of Palestine Action don't meet Govt's own proportionality test to be proscribed."*

Amnesty International UK said, "*We're deeply concerned at the use of counter terrorism powers to target protest groups. Terrorism powers should never have been used [against] Palestine Action activists, and they certainly shouldn't be used to ban them.*"

The phrase 'We are all Palestine Action' spread across social media, and was chanted at Pro-Palestine protests on Saturday. A long list of civil liberties and campaign groups are supporting the demonstration today, including Campaign Against the Arms Trade, Code Pink, Sisters Uncut, the Muslim Association of Britain, Healthworkers & Allies 4 Palestine, and CAGE.

Metropolitan Police Commissioner Mark Rowley issued a nakedly political statement in advance of the planned Palestine Action protest outside Parliament. Referring to Palestine Action as an "organised extremist political group", he claimed that "actions in support of such a group go beyond what most would see as legitimate protest." Rowley announced Public Order Conditions using Section 14 of the Public Order Act to create a huge exclusion zone around Westminster, effectively banning the protest. In response, the protest moved to Trafalgar Square.

Despite Rowley's intimidatory statement, heavy-handed policing, and the last minute change of venue, thousands still gathered in support of Palestine Action. They chanted "We are all Palestine Action" and "We won't be intimidated". Police aggression, given license by Rowley, was not long in coming, with protestors being assaulted, grabbed from the crowd, and dragged away under arrest. According to reports, at least eight protestors appear to have been arrested.

Speaking at the demonstration, in relation to the ban on protesting outside Parliament, a Palestine Action spokesperson stated, "*It's really troubling that the head of the Met would pre-empt the government and ban us from protesting. It's a frustrating turn for democracy in this country*.

Another added: "*Providing military and arms supports for a state committing genocide, while detaining and outlawing the activists opposing their complicity: this is naked authoritarianism.*"

Another Palestine Action support demonstration is being held today at St Peter's Square, Manchester, starting at 6pm.

In earlier news, activists from Palestine Action visited the UK offices of Invesco Ltd at Henley-on-Thames covering the premises in symbolic blood-red paint, and

leaving the message 'Drop Elbit'. Invesco are an American-owned international investment company, who hold over $126 Million in shares in Elbit Systems, Israel's biggest weapons company.

The group previously stated, in response to the Home Secretary's announcement: *"On Monday, Yvette Cooper is due to tell Parliament that she will be banning Palestine Action, but Palestine Action is every person who opposes genocide and the Israeli war machine. We represent every person who believes that Palestinian lives are worth more than the tools used to kill them. The terrorists are those facilitating the daily massacres of Palestinians – not those taking action to stop them."*

A separate press statement will be issued relating to events in Parliament.

ENDS

NOTES TO EDITORS

If you would like any further information on Palestine action, please contact media@palestineaction.org

Palestine Action is a direct-action network of groups and individuals formed with the mandate of taking action against the sites of Elbit Systems and other companies complicit in Israeli apartheid, calling for all such sites to be shut down.

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Not in GB?

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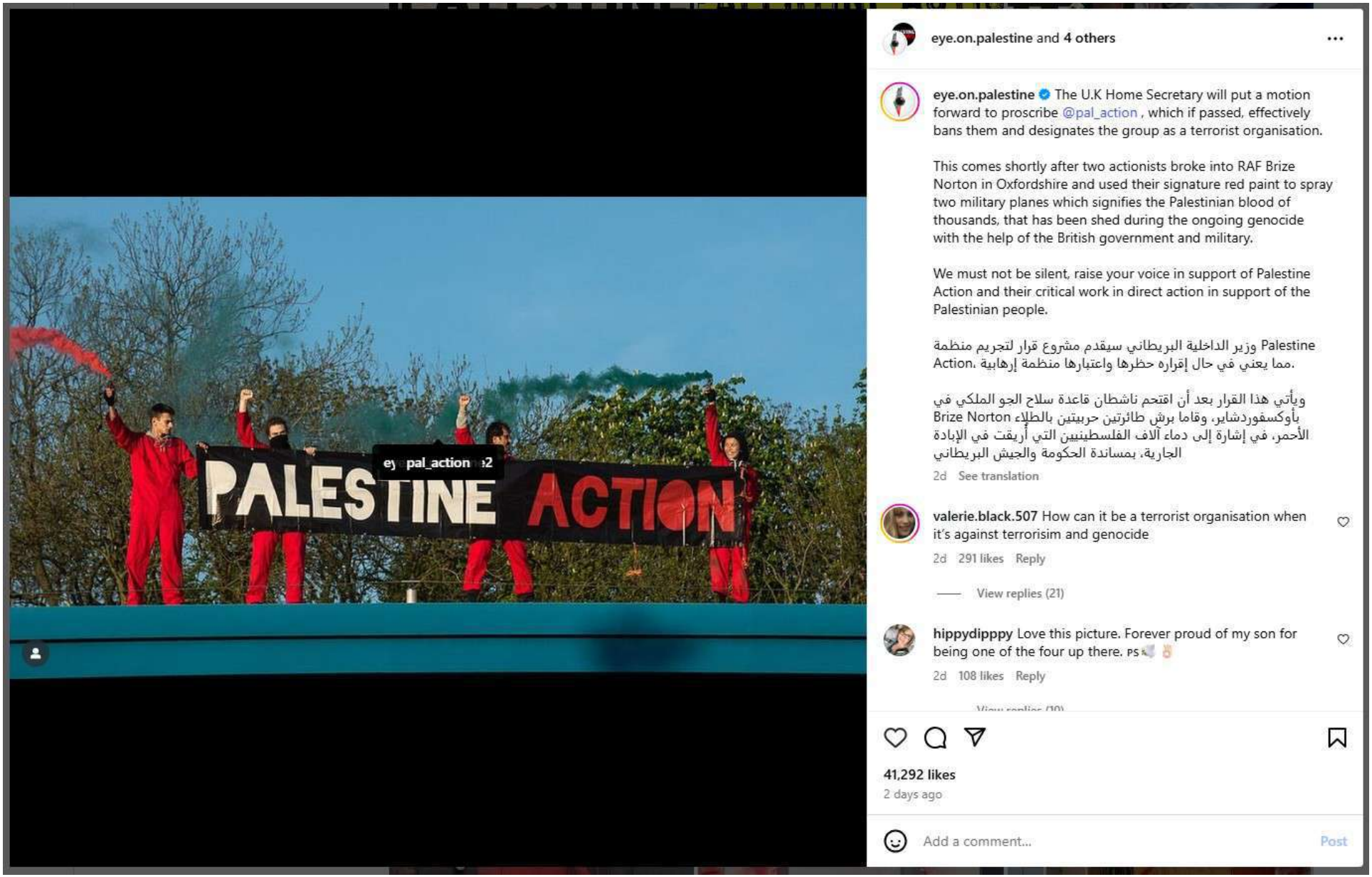
PALESTINE ACTION
eye.on.palestine and 4 others
eye.on.palestine The U.K Home Secretary will put a motion forward to proscribe @pal_action , which if passed, effectively bans them and designates the group as a terrorist organisation.
This comes shortly after two actionists broke into RAF Brize Norton in Oxfordshire and used their signature red paint to spray two military planes which signifies the Palestinian blood of thousands, that has been shed during the ongoing genocide with the help of the British government and military.
We 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.
وزير الداخلية البريطاني سيقدم مشروع قرار لتجريم منظمة Palestine Action، مما يعني في حال إقراره حظرها واعتبارها منظمة إرهابية.
ويأتي هذا القرار بعد أن اقتحم ناشطان قاعدة سلاح الجو الملكي في بأوكسفوردشاير، وقاما برش طائرتين حربيتين بالطلاء Brize Norton الأحمر، في إشارة إلى دماء آلاف الفلسطينيين التي أُريقت في الإبادة الجارية، بمساندة الحكومة والجيش البريطاني
2d See translation
valerie.black.507 How can it be a terrorist organisation when it's against terrorisim and genocide
2d 291 likes Reply
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hippydipppy Love this picture. Forever proud of my son for being one of the four up there. PS
2d 108 likes Reply
41,292 likes
2 days ago
Add a comment...
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defendourjuries and **2 others**
Woolwich Crown Court

defendourjuries WE ARE ALL PALESTINE ACTION

The use of anti-terror laws to silence those opposed to gen0c'de MUST STOP!

The suggestion to consider @pal_action as a proscribed group is a gross violation of UK law, opposes the definition of what a terrorist actually does, and insults the memories of victims both of genuine terrorism and of the atrocities committed in Palestine.

This suggestion must be opposed.

Join us in support of the #Filton18 outside Woolwich Crown Court on June 30th - full details on our feed.

Edited · 2d

thelidonascream 🔥🔥❤️❤️
2d 1 like Reply

abstrak_timages ✊✊✊✊
2d 1 like Reply

fu_mansu Everyone sign up. They can't arrest us all. Or maybe they can. Brilliant.
2d 2 likes Reply

freefreepalestine72 Thank you, solidarity🙌🔥❤️
2d 2 likes Reply

stranger_or_wayfarer Ppl coming from Birmingham & black country. Link to coach on page ✌️

1,720 likes
2 days ago

Add a comment... Post

defendourjuries and **4 others**
Woolwich Crown Court

defendourjuries WE ARE ALL PALESTINE ACTION

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2d

dennismouse In our millions, in our billions! WE ARE ALL PALESTINIAN'S!! ❤️❤️🔥🔥

2d 16 likes Reply

cllosgi Fkin heroes! All Starmer is doing is launching a huge graffiti project.

2d 13 likes Reply

romanshortall When will the British state proscribe itself for all the acts of terror it has committed worldwide?

2d 17 likes Reply

tm__stn PSPSPS

2d 1 like Reply

3,312 likes
2 days ago

Add a comment... Post

parentsforpalestine and pal_action
London, United Kingdom

parentsforpalestine When we have a government that believes red paint is more dangerous than bombs that maim and kill children, that criminalises solidarity with those that are oppressed while sending military spy planes in the service of genocide.

"We represent every individual who opposes the Israeli war machine. We represent every person who stands for Palestinian liberation. If they want to ban us, they ban us all."

#We are all Palestine Action

Bring a placard, t-shirt, badge with 'We are all Palestine Action' on it to the national demo tomorrow - we'll be at Whitehall from 1-3pm with some too.

Edited · 2d

annejoelleford Exactly this 💯
2d 14 likes Reply

View replies (1)

fayaz7691 👏
2d 1 like Reply

mk5sto 👏👏👏👏
2d 1 like Reply

its_feeny 🔥🔥🔥💗
2d 1 like Reply

4,517 likes
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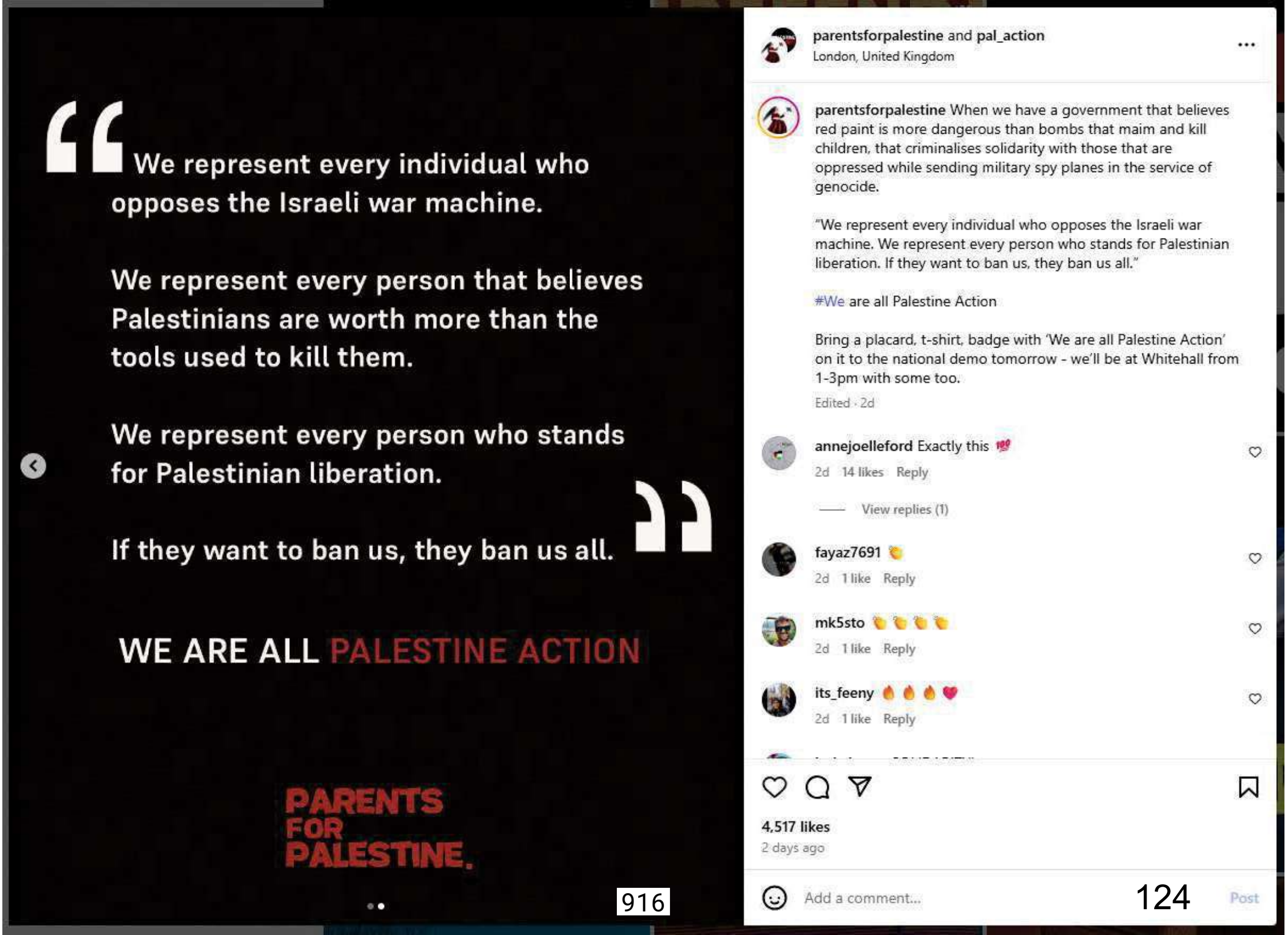
915

123


We represent every individual who opposes the Israeli war machine.
We represent every person that believes Palestinians are worth more than the tools used to kill them.
We represent every person who stands for Palestinian liberation.
If they want to ban us, they ban us all.
WE ARE ALL PALESTINE ACTION
PARENTS FOR PALESTINE.
916
parentsforpalestine and pal_action
London, United Kingdom
parentsforpalestine When we have a government that believes red paint is more dangerous than bombs that maim and kill children, that criminalises solidarity with those that are oppressed while sending military spy planes in the service of genocide.
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Edited · 2d
annejoelleford Exactly this 💯
2d 14 likes Reply
View replies (1)
fayaz7691 👏
2d 1 like Reply
mk5sto 👏👏👏👏
2d 1 like Reply
its_feeny 🔥🔥🔥❤️
2d 1 like Reply
4,517 likes
2 days ago
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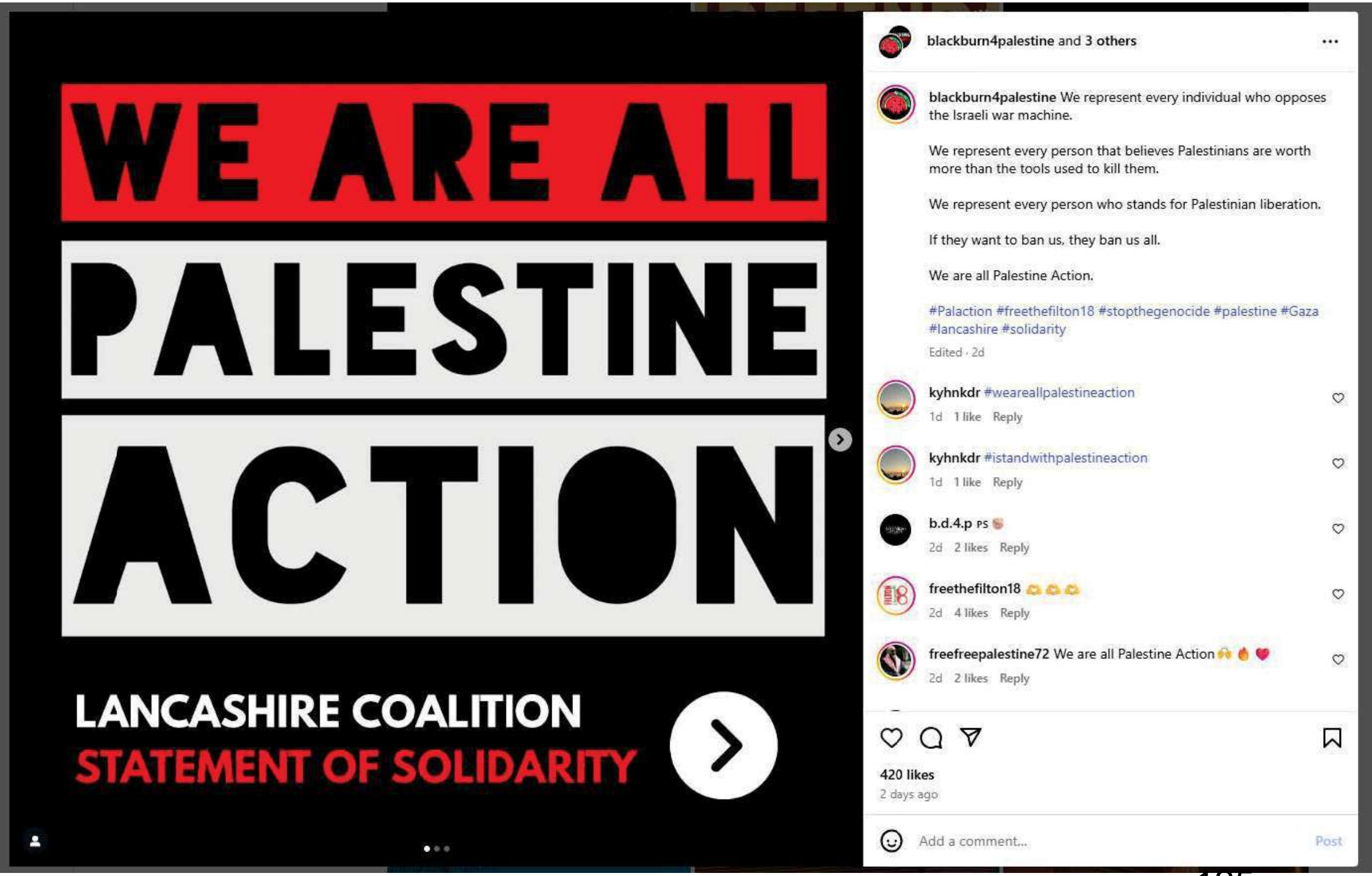
Post


WE ARE ALL
PALESTINE
ACTION
LANCASHIRE COALITION
STATEMENT OF SOLIDARITY
blackburn4palestine and 3 others
blackburn4palestine We represent every individual who opposes the Israeli war machine.
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If they want to ban us, they ban us all.
We are all Palestine Action.
#Palaction #freethefilton18 #stopthegenocide #palestine #Gaza #lancashire #solidarity
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kyhnkdr #weareallpalestineaction
1d 1 like Reply
kyhnkdr #istandwithpalestineaction
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freethefilton18
2d 4 likes Reply
freefreepalestine72 We are all Palestine Action
2d 2 likes Reply
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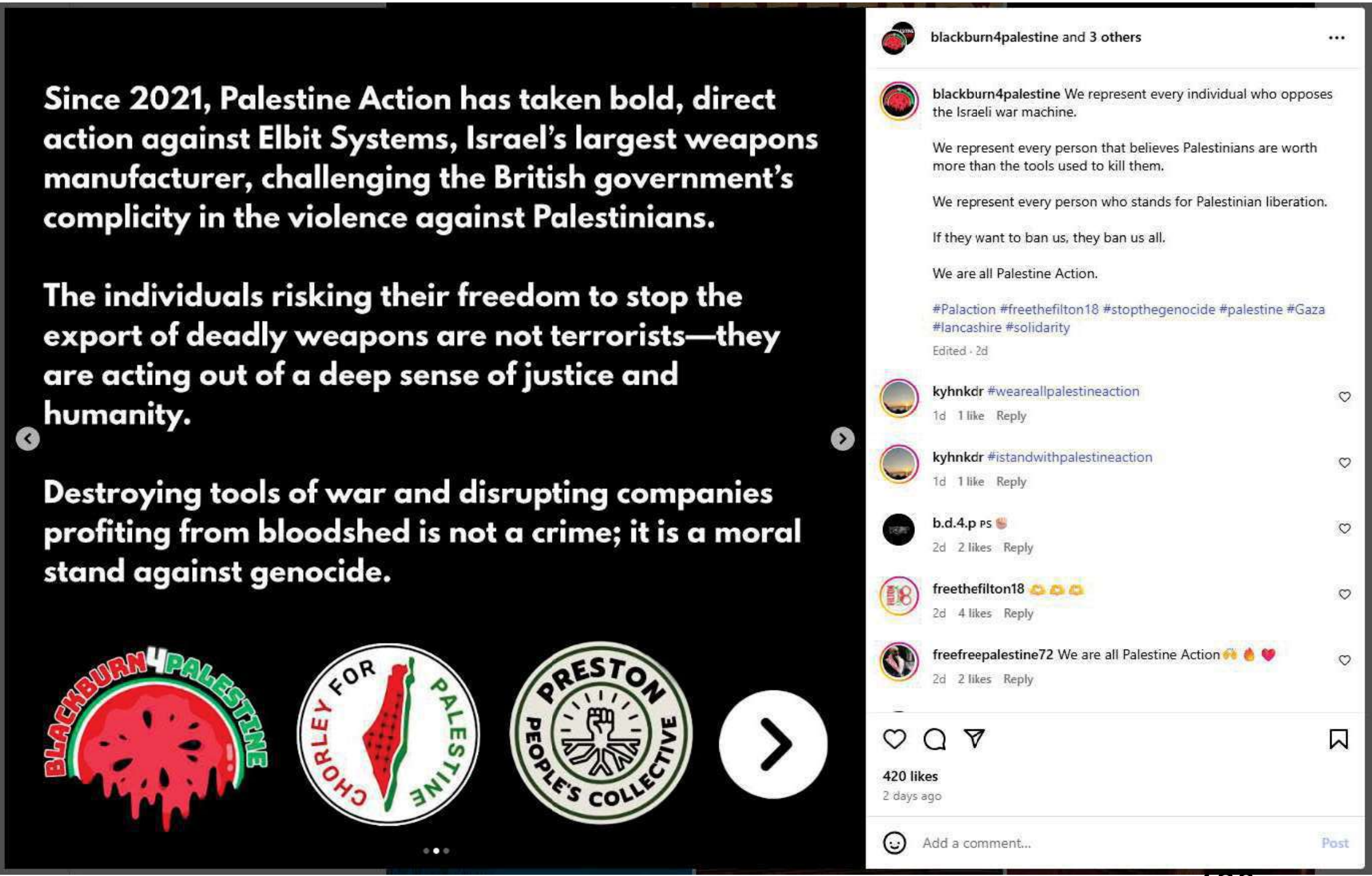
Since 2021, Palestine Action has taken bold, direct action against Elbit Systems, Israel's largest weapons manufacturer, challenging the British government's complicity in the violence against Palestinians.
The individuals risking their freedom to stop the export of deadly weapons are not terrorists—they are acting out of a deep sense of justice and humanity.
Destroying tools of war and disrupting companies profiting from bloodshed is not a crime; it is a moral stand against genocide.
BLACKBURN 4 PALESTINE
CHORLEY FOR PALESTINE
PRESTON PEOPLE'S COLLECTIVE
blackburn4palestine and 3 others
blackburn4palestine We represent every individual who opposes the Israeli war machine.
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We are all Palestine Action.
#Palaction #freethefilton18 #stopthegenocide #palestine #Gaza #lancashire #solidarity
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kyhnkdr #weareallpalestineaction
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freethefilton18
2d 4 likes Reply
freefreepalestine72 We are all Palestine Action
2d 2 likes Reply
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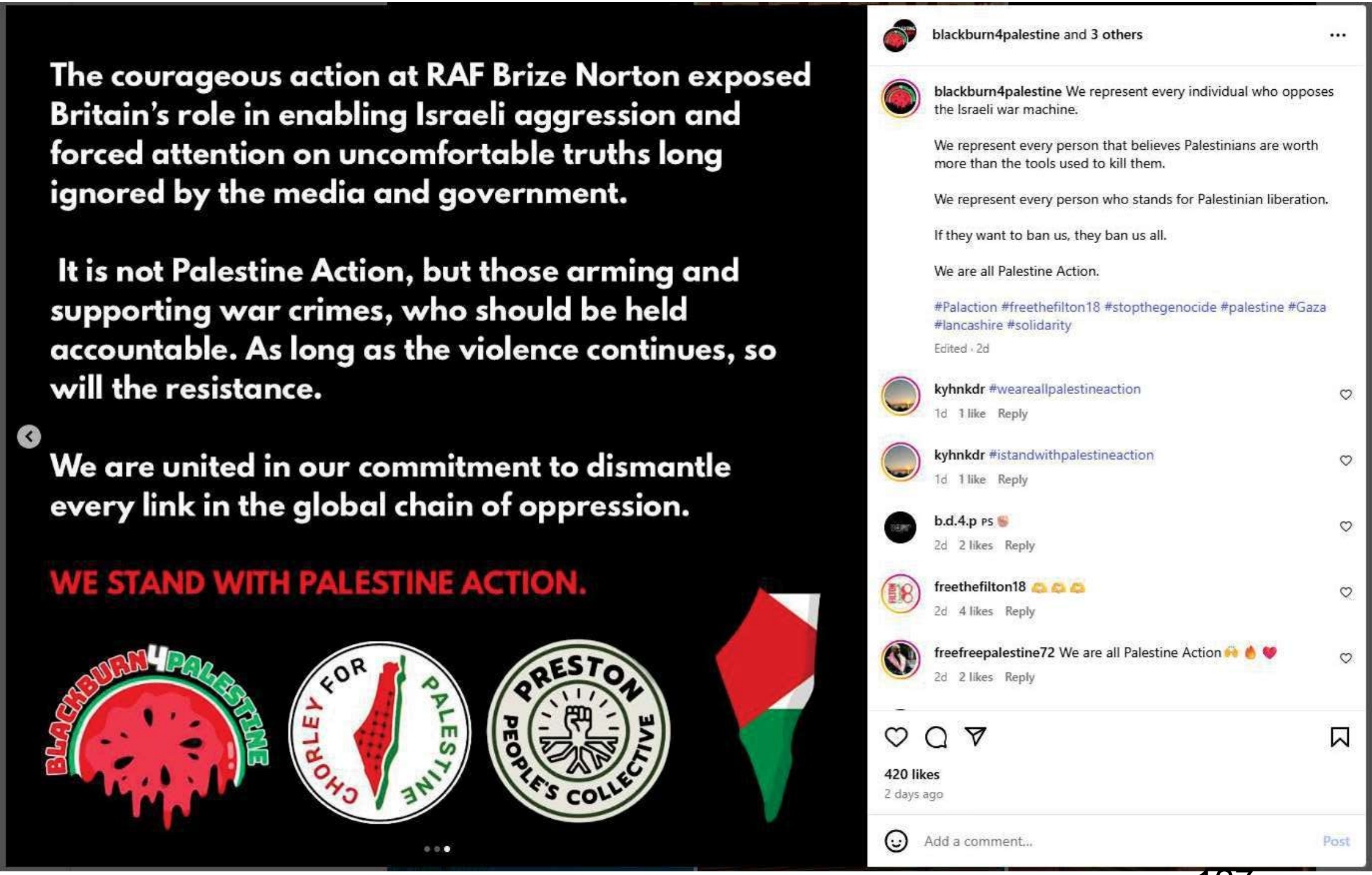
The courageous action at RAF Brize Norton exposed Britain's role in enabling Israeli aggression and forced attention on uncomfortable truths long ignored by the media and government.
It is not Palestine Action, but those arming and supporting war crimes, who should be held accountable. As long as the violence continues, so will the resistance.
We are united in our commitment to dismantle every link in the global chain of oppression.
WE STAND WITH PALESTINE ACTION.
BLACKBURN4PALESTINE
CHORLEY FOR PALESTINE
PRESTON PEOPLE'S COLLECTIVE
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kyhnkdr #weareallpalestineaction
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kyhnkdr #istandwithpalestineaction
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freethefilton18
2d 4 likes Reply
freefreepalestine72 We are all Palestine Action
2d 2 likes Reply
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just.stopoil and 2 others

just.stopoil When the Ploughshares Women smashed up RAF planes in the 1990s, they were charged with criminal damage and found not guilty by a jury. They were not labelled terrorists.

Who are the terrorists? Those who blow up babies and destroy hospitals, or those who seek to stop the bombs falling?

We stand with Palestine Action.

2d

stephenmbarlow 💯

2d Reply

angiewickenden 👏😍

1d Reply

siobhannichurrain 🙌🙌🙌🙌🙌

1d Reply

hollyexley_illustration The Overton window has swung so far to the right since the 90s

2d 20 likes Reply

shortforjacket 👏

2d Reply

hintofsarcasm Aw. I was with you all the past few years and now you've spoiled it 🙄

2d 2 likes Reply

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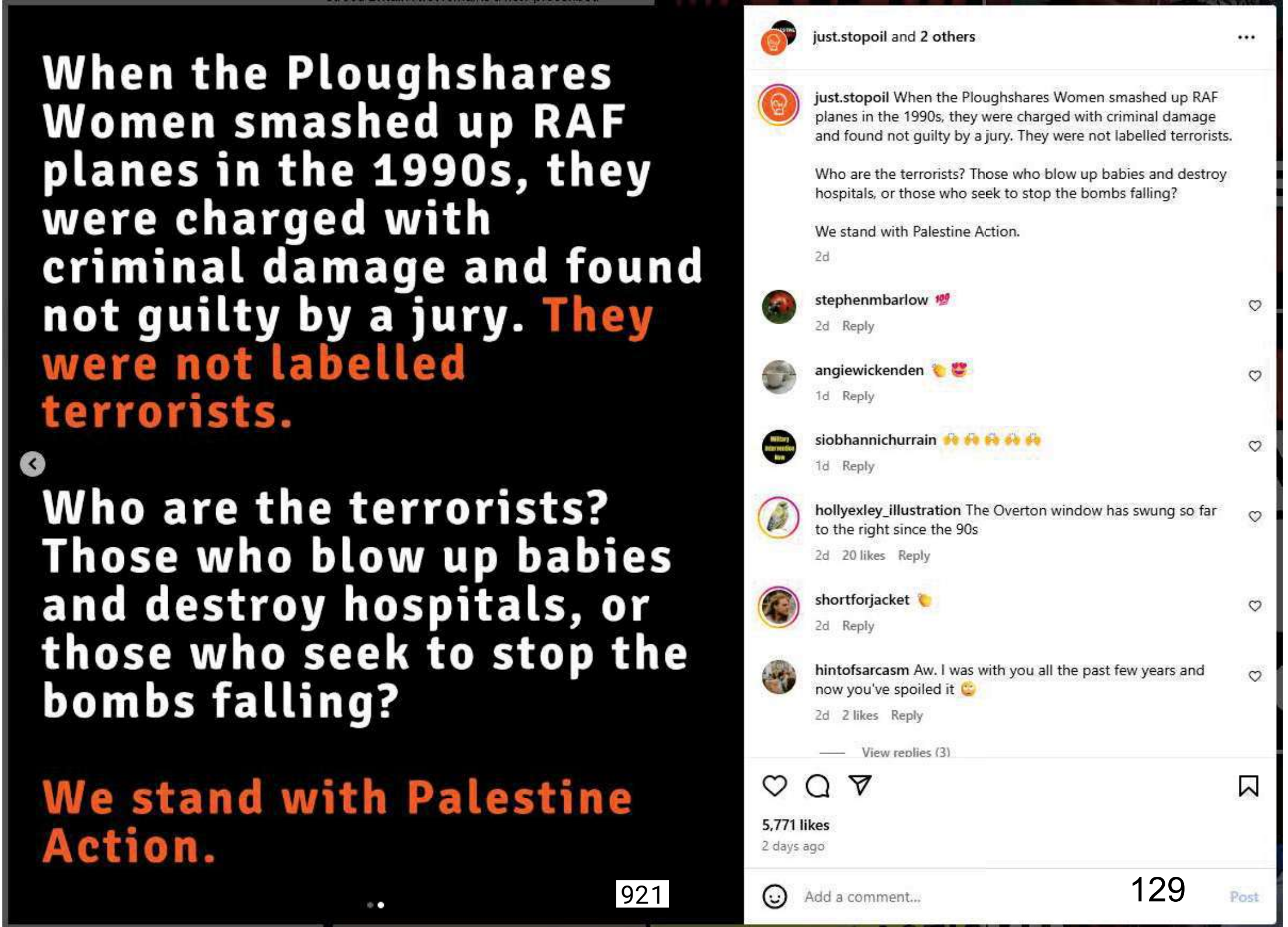
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2d 20 likes Reply
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europe.palestine.network We are all @pal_action ! 🫶🏻❤️
2d

anitaaa.rk_ WE LOVE YOUUUU🔥🔥🔥❤️❤️❤️❤️
2d 1 like Reply

kyhnkdr #weareallpalestineaction
2d 1 like Reply

singing_global 🌍❤️‍🩹🎶
2d Reply

amayarahusseinassegaf The face of the resistance, the face of heroes 🔻
2d 2 likes Reply

View replies (1)

alhawteo respect Free Palestine
2d Reply

maferz_18 📢🆘⛴️ PSPSPS🕊️🫶🏻🙏
1d Reply

itx._.talha._.rajput #weareallpalestineaction PS
1d Reply

jamila_alquds_jewellery 🔻🔻🔻🔻🔻 love and solidarity pal-action

1,563 likes
2 days ago

Add a comment... Post

sistersuncut and pal_action

sistersuncut WE ARE ALL PALESTINE ACTION

THE USE OF ANTI-TERROR LAWS TO SILENCE THOSE OPPOSED TO GENOCIDE MUST STOP!

The U.K Home Secretary will put a motion forward to proscribe @pal_action which if passed bans them and designates the group as a terrorist organisation.

This comes after two actionists broke into RAF Brize Norton in Oxfordshire and used their signature red paint to spray two military planes which signifies the Palestinian blood of thousands, that has been shed during the ongoing genocide with the help of the British government and military.

We must not be silent!

Support Palestine Action and their critical work in direct action in support of the Palestinian people.

2d

zane.zaza 🙌🙌🙌🙌🙌❤️💚🤍🖤

1d 2 likes Reply

walk__it__out PSPSPSPSPS

1d 1 like Reply

walk__it__out PSPSPSPSPS

1d 1 like Reply

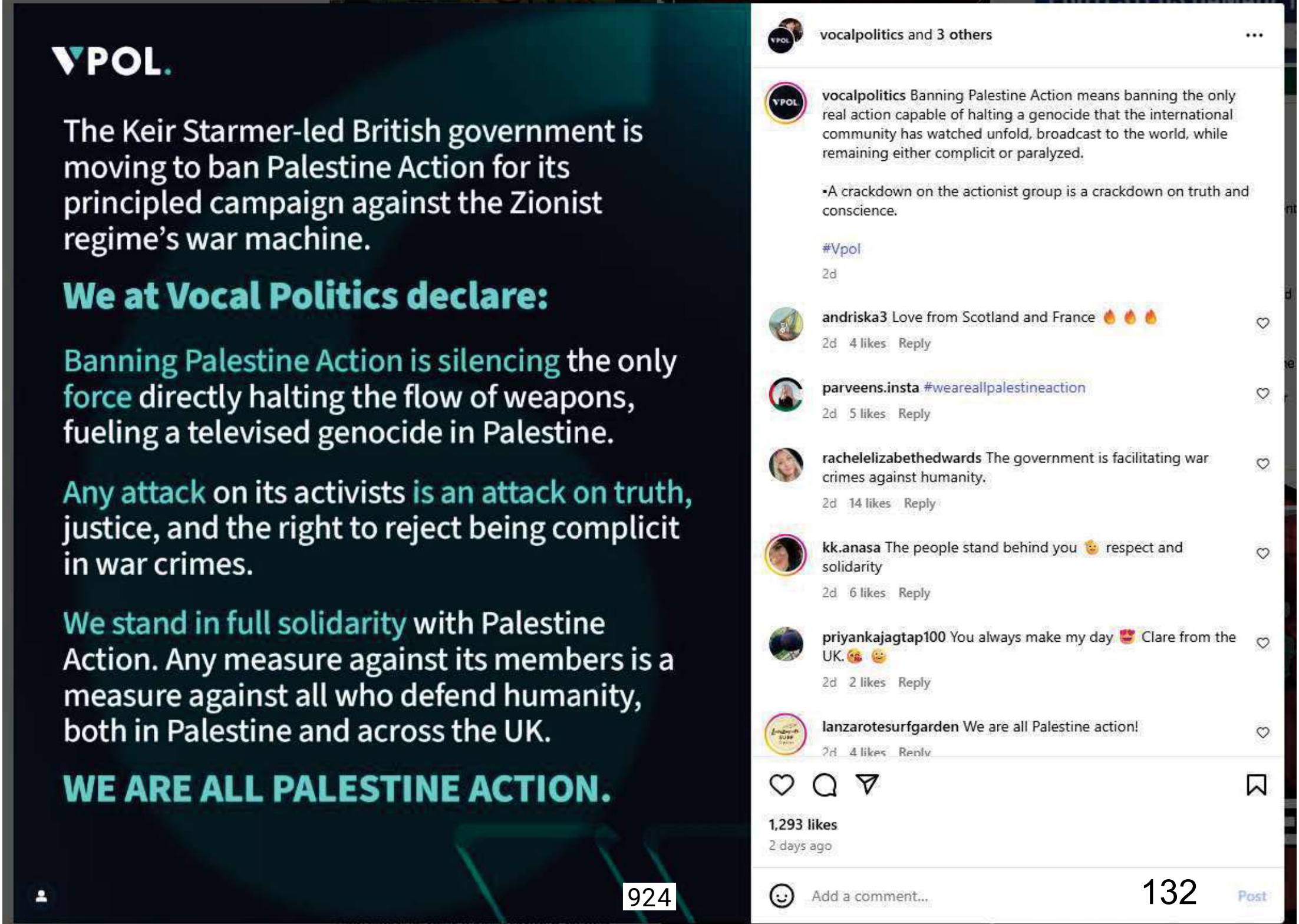
bobslassor SOLIDARITY!

2d 2 likes Reply

1,726 likes

2 days ago

Add a comment... Post


VPOL.
The Keir Starmer-led British government is moving to ban Palestine Action for its principled campaign against the Zionist regime's war machine.
We at Vocal Politics declare:
Banning Palestine Action is silencing the only force directly halting the flow of weapons, fueling a televised genocide in Palestine.
Any attack on its activists is an attack on truth, justice, and the right to reject being complicit in war crimes.
We 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.
WE ARE ALL PALESTINE ACTION.
924
vocalpolitics and 3 others
vocalpolitics Banning Palestine Action means banning the only real action capable of halting a genocide that the international community has watched unfold, broadcast to the world, while remaining either complicit or paralyzed.
▪A crackdown on the actionist group is a crackdown on truth and conscience.
#Vpol
2d
andriska3 Love from Scotland and France
2d 4 likes Reply
parveens.insta #weareallpalestineaction
2d 5 likes Reply
rachelelizabethedwards The government is facilitating war crimes against humanity.
2d 14 likes Reply
kk.anasa The people stand behind you respect and solidarity
2d 6 likes Reply
priyankajagtap100 You always make my day Clare from the UK.
2d 2 likes Reply
lanzarotesurfgarden We are all Palestine action!
2d 4 likes Reply
1,293 likes
2 days ago
Add a comment...
132
Post

leicsaction4pal and 2 others

leicsaction4pal Leicester Action for Palestine stand with @pal_action and condemn the UK home secretary's call to proscribe them as a terrorist organisation. Solidarity to all facing repression for fighting against the UK war machine, from those targeting corporate banks to those disrupting military planes and equipment on UK soil which are used to commit genocide against the Palestinian people.

Globalise the Intifada.

Free Palestine.

1d

attpsummer 🍋

1d Reply

leicesterpsc 🔥🔥🔥🔥🔥🔥🔥🔥🔥🔥🔥

1d 1 like Reply

saramasry Nice work 👀👀
shame, everlasting shame on every complicit party

1d 4 likes Reply

View replies (2)

veg_doll They have resources to rescue gazans using the route to Cyprus. How are the pilots tolerating orders after so long and becoming so traumatised what life do they think they are living

1d 3 likes Reply

View replies (1)

4,980 likes
1 day ago

Add a comment... 133 Post

926

leicsaction4pal and 2 others

leicsaction4pal Leicester Action for Palestine stand with @pal_action and condemn the UK home secretary's call to proscribe them as a terrorist organisation. Solidarity to all facing repression for fighting against the UK war machine, from those targeting corporate banks to those disrupting military planes and equipment on UK soil which are used to commit genocide against the Palestinian people.

Globalise the Intifada.

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1d

attpsummer 🍋

1d Reply

leicesterpsc 🔥🔥🔥🔥🔥🔥🔥🔥🔥🔥🔥

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1d 3 likes Reply

View replies (1)

4,980 likes
1 day ago

Add a comment... Post

134

927

pymbritain and 3 others

government's defamatory threats of possible proscription.

As this critical part of our movement is targeted, we must extend our unwavering support to Palestine Action and join forces to collectively resist the precedent that this will set. We must insist on continuing taking to the streets in mass, providing support for comrades facing state repression and violence, and insisting that an attack on one part of our movement is an attack on the entire movement.

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🗓️ Friday 4th July | 10:30AM | Royal Courts of Justice
➡️ Stop the potential ban before it's imposed. Stand with Palestine Action.

Edited · 1d

msji.uk Unconditional solidarity 💜
1d 1 like Reply

sarahdenisonphoto ❤️❤️❤️❤️❤️❤️❤️❤️
1d Reply

jpn_1983 👏👏👏👏👏👏👏👏👏👏👏👏👏👏👏👏👏👏 PS ❤️
14h Reply

rotherhamfop ✊ PS
1d Reply

1,385 likes
1 day ago

Add a comment... Post

135

928

pymbritain and 3 others

pymbritain ‼ UPDATE: OVER 100 GRASSROOTS ORGANISATIONS STAND IN SOLIDARITY WITH @pal_action ‼

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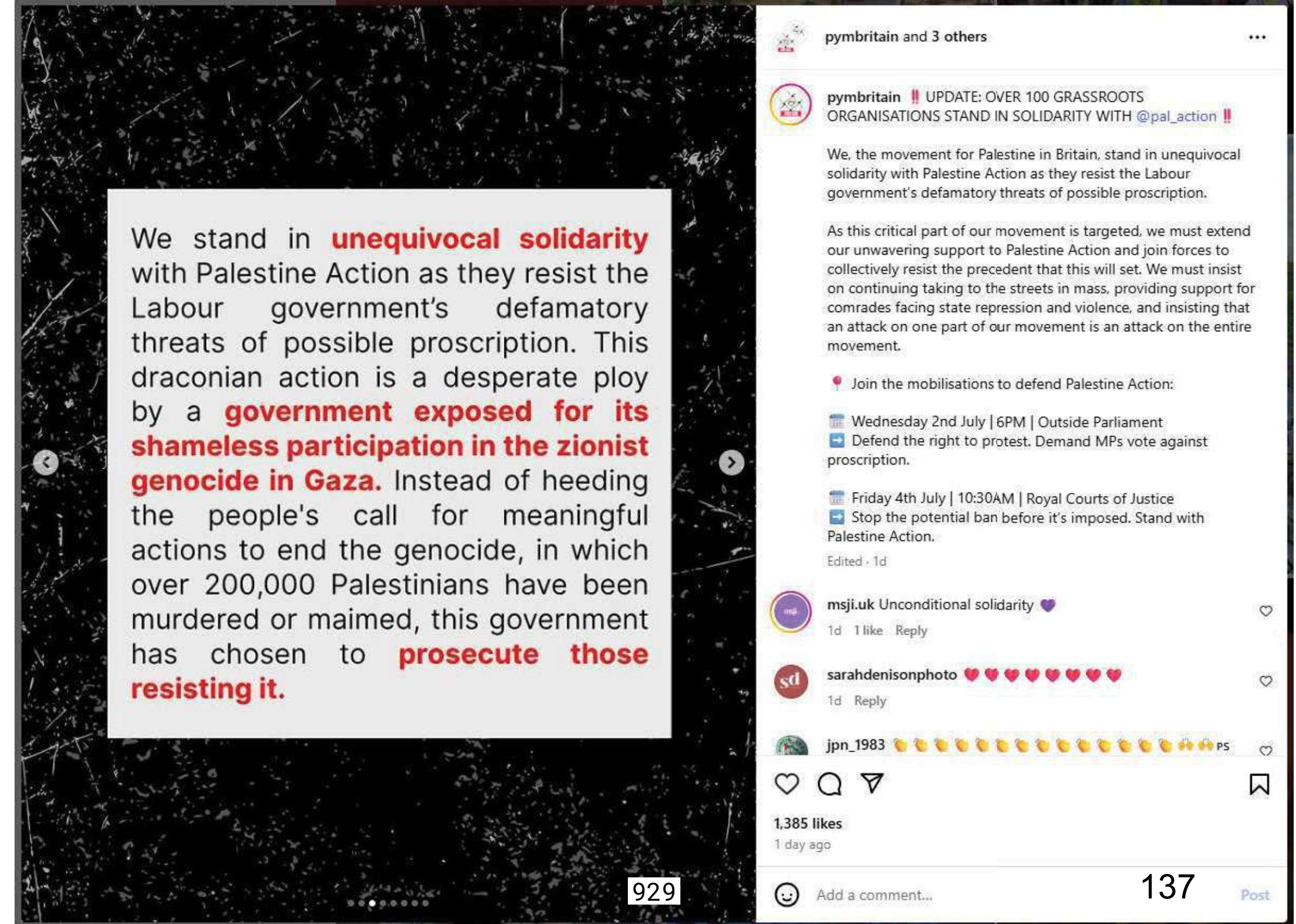
1d Reply

jpn_1983 👏👏👏👏👏👏👏👏👏👏👏👏👏👏👏👏👏👏 PS

1,385 likes
1 day ago

Add a comment... Post

136


We stand in unequivocal solidarity with Palestine Action as they resist the Labour government's defamatory threats of possible proscription. This draconian action is a desperate ploy by a government exposed for its shameless participation in the zionist genocide in Gaza. Instead of heeding the people's call for meaningful actions to end the genocide, in which over 200,000 Palestinians have been murdered or maimed, this government has chosen to prosecute those resisting it.
pymbritain and 3 others
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jpn_1983 PS
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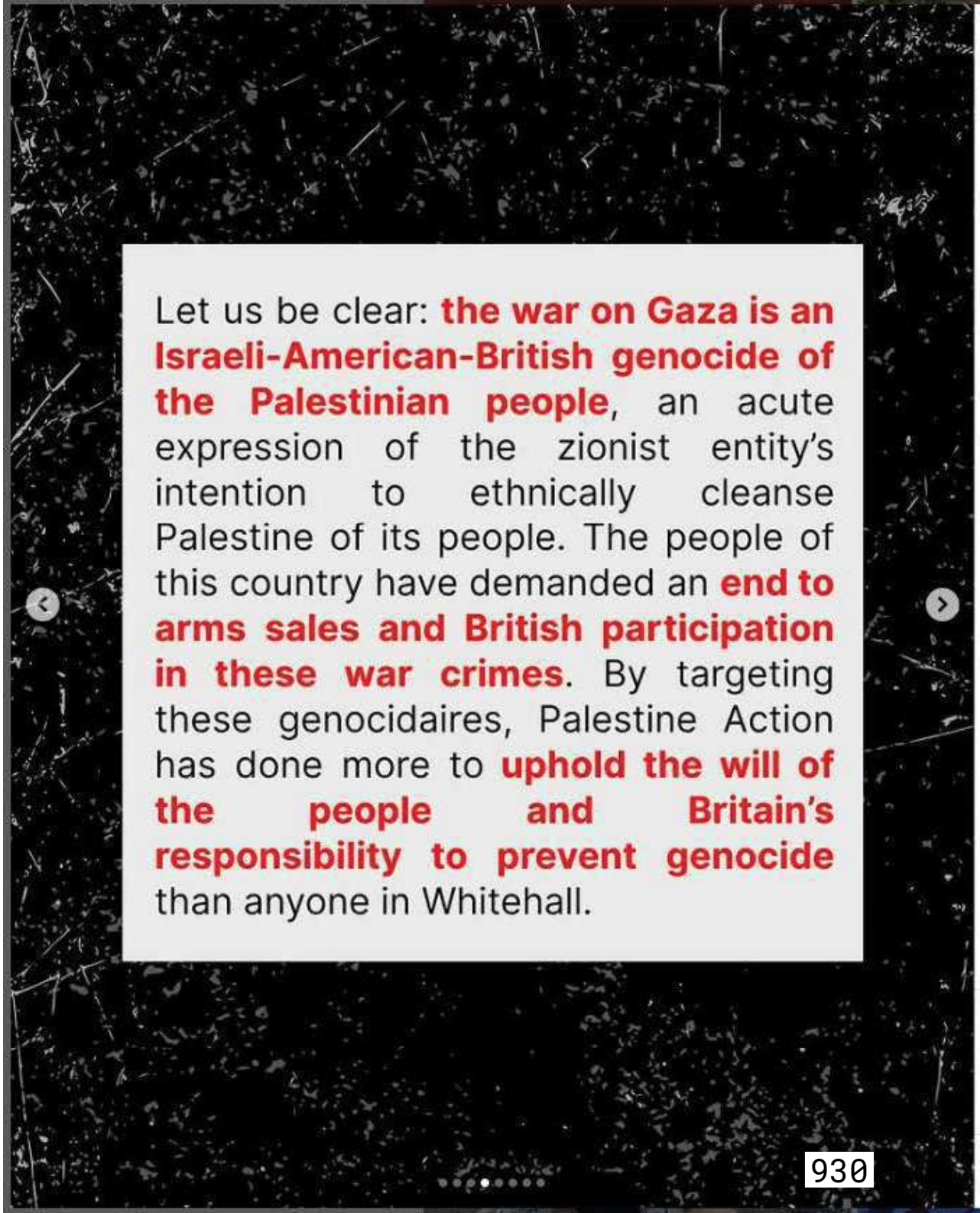
1 day ago
Add a comment...
Post
929
137



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1d Reply

jpn_1983 👏👏👏👏👏👏👏👏👏👏👏👏👏👏🔥🔥PS

1,385 likes
1 day ago

Add a comment... Post

138

pymbritain and 3 others

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sarahdenisonphoto ❤️❤️❤️❤️❤️❤️❤️❤️
1d Reply

jpn_1983 👏👏👏👏👏👏👏👏👏👏👏👏👏👏👏👏👏👏PS

1,385 likes
1 day ago

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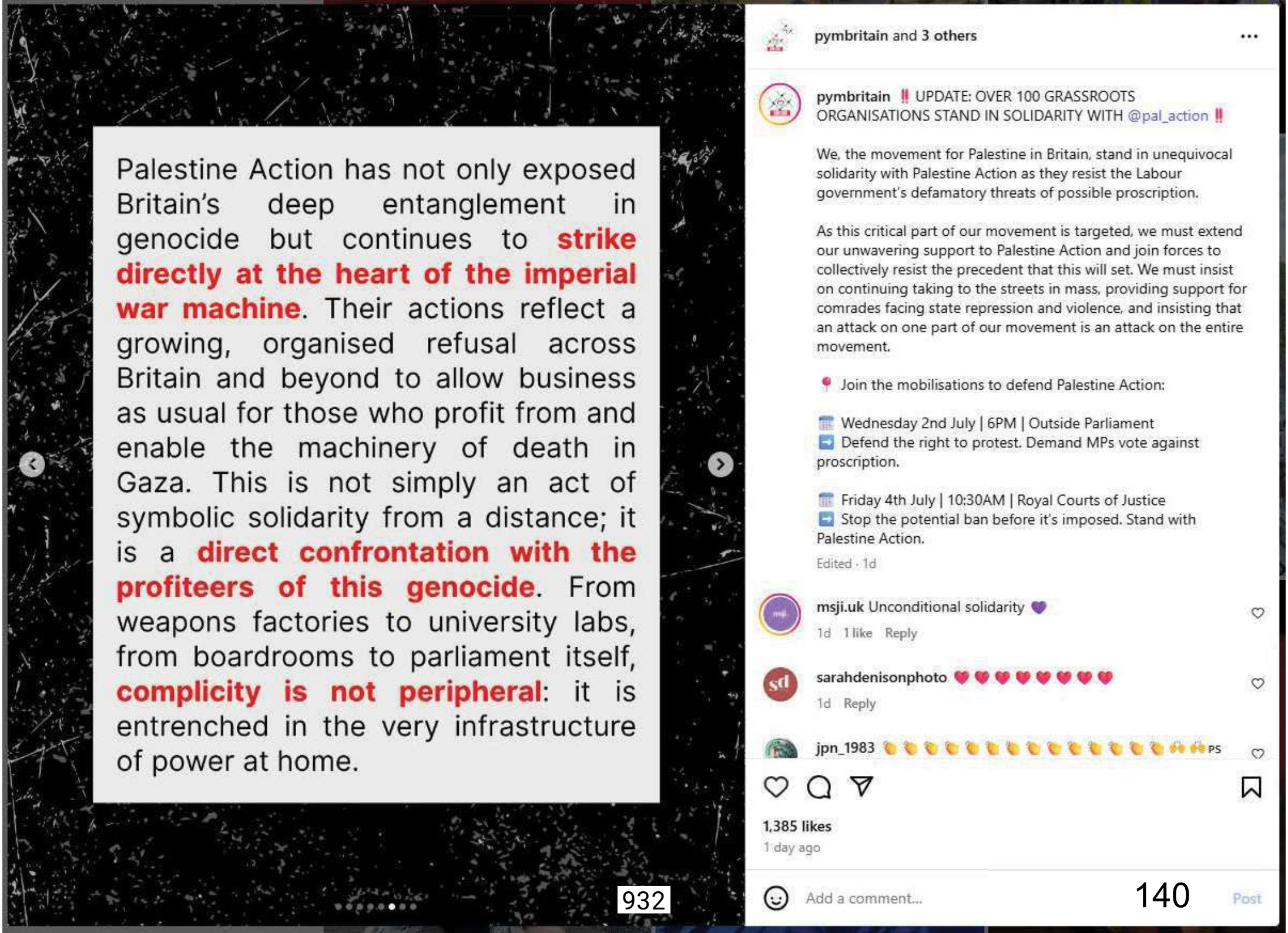
Palestine Action has not only exposed Britain's deep entanglement in genocide but continues to strike directly at the heart of the imperial war machine. Their actions reflect a growing, organised refusal across Britain and beyond to allow business as usual for those who profit from and enable the machinery of death in Gaza. This is not simply an act of symbolic solidarity from a distance; it is a direct confrontation with the profiteers of this genocide. From weapons factories to university labs, from boardrooms to parliament itself, complicity is not peripheral: it is entrenched in the very infrastructure of power at home.
pymbritain and 3 others
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Edited · 1d
msji.uk Unconditional solidarity 💜
1d 1 like Reply
sarahdenisonphoto ❤❤❤❤❤❤❤❤
1d Reply
jpn_1983 PS
1,385 likes
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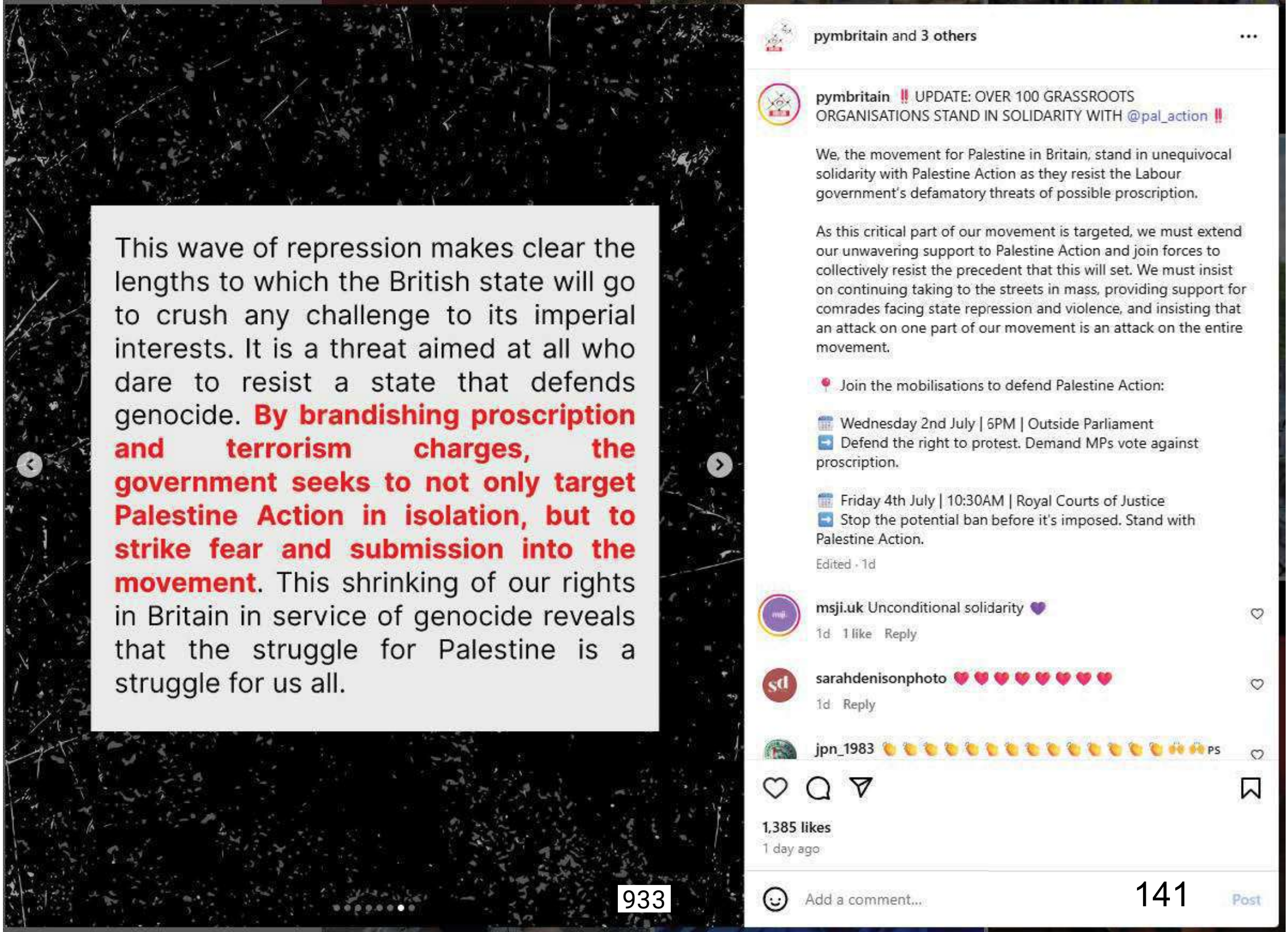
Add a comment...
Post


This wave of repression makes clear the lengths to which the British state will go to crush any challenge to its imperial interests. It is a threat aimed at all who dare to resist a state that defends genocide. By brandishing proscription and terrorism charges, the government seeks to not only target Palestine Action in isolation, but to strike fear and submission into the movement. This shrinking of our rights in Britain in service of genocide reveals that the struggle for Palestine is a struggle for us all.
pymbritain and 3 others
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jpn_1983 👏👏👏👏👏👏👏👏👏👏👏👏👏👏👏👏👏👏 PS
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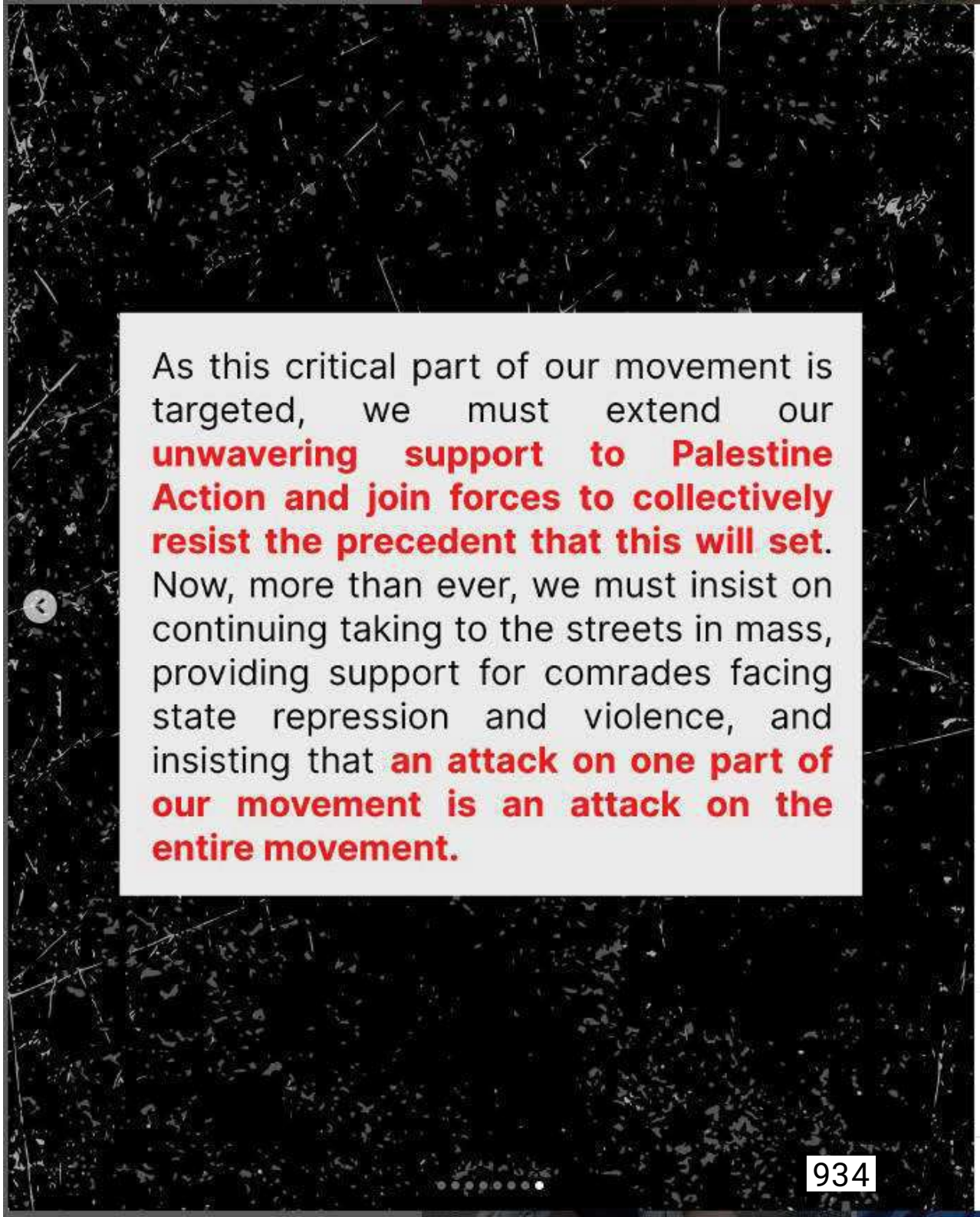
Add a comment...
Post
933
141



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1d Reply

jpn_1983 👏👏👏👏👏👏👏👏👏👏👏👏👏👏🙌🙌PS

1,385 likes
1 day ago

Add a comment... Post

934

142

yvette_copper and **3 others**
Original audio

yvette_copper 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?

3d

ah_1_3_1_2 We are all yvette cooper PSIE ✊

3d 664 likes Reply

View replies (10)

cllosgi I LOVE this... and that fact that sooner or later, they will try to ban Yvette Cooper.

3d 550 likes Reply

View replies (3)

s0ci3ties_r3i3ct This is top class shithouserv. I ove it.

16,747 likes
3 days ago

Add comment...

143

yvette_copper

YVETTE COOPER

NEW

1 post

4,782 followers

1 following

A direct action group aimed at ending British complicity with genocide. Our name is a parody, but the mission is real.

Follow Message

yvette_copper and **3 others**
Lowkey, Jon McClure, Mic Righteous, Faith SFX • Revolution

yvette_copper 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.

7h

lyndonedwardson Finally, a Yvette Cooper I can get behind 👏 😂 PS

6h 438 likes Reply

View replies (2)

colletegwenningham I stand with Yvette Cooper! Never thought I'd say that but here we are! 😜 🙌

6h 191 likes Reply

View replies (1)

conor_daly_49 Super idea from Yvette, wonder how her

Liked by **eye.on.palestine** and **9,847 others**

7 hours ago

937 a comment... 145 Post

938

pal_action and 3 others
London, United Kingdom

pal_action 🚨 LOCATION OF PROTEST CHANGED TO TRAFALAR SQUARE 🚨

After the Metropolitan police banned the protest from happening at the Houses of Parliament, it has been moved to Trafalgar Square, London.

The state is trying EVERYTHING to deter people from supporting Palestine Action. Dont let them win - make sure to pass this message on far and wide.

MOBILISE FROM 12PM TODAY (MONDAY 23RD JUNE) AT TRAFALGAR SQUARE, LONDON.

Edited · 9h

stand_with_palestine_gr ❤️❤️ we are all with pal action ❤️❤️
9h 14 likes Reply

View replies (1)

fadlimutadar #freepalestineps👊 ❤️ ID
8h 2 likes Reply

View replies (1)

mew3ree When do these public servants get to tell us where to protest f them we can protest where we like
9h 27 likes Reply

dennismouse I'm so sorry I can't make this. Thank you all who can. ❤️🔥
8h 3 likes Reply

9,638 likes
9 hours ago

Add a comment... Post

146

pal_action and 3 others
Houses of Parliament

pal_action UPDATE: LOCATION CHANGED TO TRAFALGAR SQUARE, LONDON.

12PM Start
Monday 23rd June
Trafalgar Square, London

Stand in unequivocal solidarity with Palestine Action as we resist the Labour government's defamatory threats of possible proscription.

Palestine Action has taken direct action for the past 5 years against the zionist weapons industry. On Friday 20 June, they decomissioned two Royal Air Force military aircrafts at RAF Brize Norton, a crucial node for the imperialist war machine where British spy planes are refueled and primed for surveillance flights over Gaza. For breaking the tools used to commit genocide, the British government plans to proscribe the group.

A rushed banning of a protest group is unprecedented, draconian, and is an attack on the movement as a whole. Mobilise with us en masse to show solidarity and stand against the British state's attempt to repress us all!

The Home secretary plans to issue a statement on Monday to ban Palestine Action: be there in numbers to stand against it

Edited · 9h

christiemegs 🙌
2d 3 likes Reply

kernekerney Yes 🔥
2d 11 likes Reply

5,368 likes
2 days ago

Add a comment... Post

939

147

940

pal_action and 3 others
Houses of Parliament

pal_action UPDATE: LOCATION CHANGED TO TRAFALGAR SQUARE, LONDON.

🕛 12PM Start
🗓️ Monday 23rd June
📍 Trafalgar Square, London

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Edited · 9h

christiemegs 🙌
2d 3 likes Reply

kernekerney Yes 🔥
2d 11 likes Reply

5,368 likes
2 days ago

Add a comment...

148

Post

Palestine Action group to be banned, home secretary confirms

EPA

Hundreds demonstrated in Trafalgar Square ahead of the announcement on Monday, after police blocked protesters from gathering outside Parliament

23 June 2025, 12:55 BST

Updated 58 minutes ago

Imogen James
BBC News

Ellie Price
BBC News in central London

Home Secretary Yvette Cooper has said she will proscribe Palestine Action under anti-terror law.

It comes days after activists from the group broke into RAF Brize Norton in Oxfordshire and spray-painted two military planes red - an incident Cooper called "disgraceful".

The move effectively brands the group a terrorist organisation and, if passed in Parliament, would make membership of and support of the group illegal.

Palestine Action called the government's action "unhinged".

Cooper's announcement came as Palestine Action held a protest in central London, with hundreds in attendance and thirteen arrested as scuffles broke out.

Announcing her intention to ban the group, Cooper said Palestine Action had a "long history of unacceptable criminal damage".

"The UK's defence enterprise is vital to the nation's national security and this Government will not tolerate those that put that security at risk," she added.

Counter-terrorism police are leading the investigation into **Friday's incident at Brize Norton.**

In a statement, Palestine Action said: "The real crime here is not red paint being sprayed on these war planes, but the war crimes that have been enabled with those planes because of the UK Government's complicity in Israel's genocide."

"We are teachers, nurses, students and parents who take part in actions disrupting the private companies who are arming Israel's genocide, by spray painting or entering their factory premises. It is plainly preposterous to rank us with terrorist groups like ISIS, National Action and Boko Haram", it said.

"We have instructed lawyers who are pursuing all avenues for legal challenge."

Israel has strongly denied allegations of genocide relating to the ongoing war in Gaza.

Cooper will lay the draft order before Parliament next week.

If passed, the ban would make it a criminal offence to belong to or support the group, punishable by up to 14 years in prison.

Cooper said in a written statement: "This decision is specific to Palestine Action and does not affect lawful protest groups and other organisations campaigning on issues around Palestine or the Middle East.

"It is vitally important that those seeking to protest peacefully, including pro-Palestinian groups, those opposing the actions of the Israeli government, and those demanding changes in the UK's foreign policy, can continue to do so."

She added that the group had committed several acts of serious damage since it was created in 2020, costing more than £1m in damage.

In 2022, **the group broke into Thales defence factory in Glasgow**, setting off pyrotechnics and throwing a smoke bomb into an area where staff were being evacuated.

The damage at the site was estimated at £1,130,783.

Cooper also referenced two incidents last year, when seven Palestine Action members were arrested for aggravated burglary at the Instro Precision factory in Kent, while several others broke into the Bristol HQ of Elbit Systems UK.

"I have considered carefully the nature and scale of Palestine Action's activity. Proscription represents a legitimate response to the threat posed by Palestine Action," Cooper added.

Palestine Action member tells BBC plan to ban group 'absurd'

1 day ago

Palestine Action to be banned after RAF base break in

2 days ago

Former Scottish First Minister, Humza Yousaf, **told the BBC's Scotcast podcast** Cooper's action to ban Palestine Action is a "shameful abuse of anti-terror legislation".

He added that it is an "utterly ludicrous overreaction by the United Kingdom [government] in an attempt to intimidate and ultimately silence protestors and pro-Palestinian protesters".

Nadia Whittome, Labour MP for Nottingham East, said: "We should all be concerned about plans to proscribe Palestine Action as a terrorist group. It sets a dangerous precedent, which governments in future cou 942 er use against their critics."

Chancellor Rachel Reeves condemned Palestine Action's behaviour as "totally unacceptable".

"To cause damage to military assets, but also to cause such damage to privately owned assets, it is unacceptable whatever your views are on what's happening in the Middle East," she said ahead of Cooper's statement.

Hundreds of people met at Trafalgar Square after police banned them from protesting outside of Parliament.

Some scuffles broke out during the protest

Organisers made the last-minute venue change after Scotland Yard enforced an exclusion zone across much of Westminster.

Metropolitan Police chief Sir Mark Rowley said while the force had no legal power to stop the protest, they would impose the conditions "robustly".

Charing Cross, next to Trafalgar Square, was blocked for a time as the protesters gathered.

Some supporters of the group waved Palestinian flags and carried placards, with other protesters chanting: "We will not be silenced."

The protest was required to end at 15:00 BST, when police moved in to disperse the crowd.

The Met Police said it made 13 arrests at the protest.

Six of these were for assaulting an emergency worker, one for a racially aggravated public order offence, four for refusing to disperse, and two were held for obstructing a constable in the execution of their duty, the Met said.

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cageinternational and 3 others

cageinternational YOU CAN STILL SUPPORT PALESTINE ACTION!!

Many are unsure about how to react to the government's announcement that it intends to proscribe Palestine Action.

Simply put, IT IS STILL LEGAL to support, join, and partake in the activities of Palestine Action.

Here's a brief explainer:

Edited · 21h

doctor.rahmeh Thank you for this, we need to do everything we can to stop this 🙏

21h 21 likes Reply

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15h Reply

renzcasquejo 👏👏👏👏❤️❤️❤️❤️❤️❤️🔥🔥🔥🔥🔥🔥

7h Reply

dramaschools4palestine Let's go! Resist resist resist!!

16h 7 likes Reply

m_fromholland We won't stop protesting all over the world 🙏🖤🍉✌️⏳

20h 9 likes Reply

copwatchnetwork ❤️

21h 3 likes Reply

3,813 likes

22 hours ago

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Add a comment... Post

WHAT HAPPENS TO THE MOVEMENT IF PALESTINE ACTION IS BANNED?

We mustn't let that happen. However, if it does, the work must continue to stop the genocide in Gaza and that will still include direct action methods.

948

cageinternational and 3 others

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22 hours ago

Add a comment... Post

157

WE ARE ALL PALESTINE ACTION: THE TIMETABLE

Jul 1, 2025

In a matter of days, Palestine Action could be proscribed as a terrorist organisation. It would be one of, if not the, most draconian attack of everyone's freedom of speech and right to dissent. However, we do not plan to go down without a fight, and we need everyone to join the struggle to resist proscription. **After all, we are all Palestine Action.**

For clarity, here is a timeline of key events and ways to protest the planned proscription:

WEDNESDAY 2ND JULY

Expected from 5.30PM: Debate and vote in the House of Commons

6PM: Protest – Don't Ban Palestine Action, Outside Downing St (Organised by PSC's coalition)

THURSDAY 3RD JULY

Afternoon: Debate and vote in the House of Lords

FRIDAY 4TH JULY

10.30AM-3PM: Urgent Hearing to apply for 'interim relief' to stop the proscription ban coming into effect, pending a judicial review. Protest from 10.30AM outside Royal Courts of Justice, London.

7PM: Online event on steps forward if Palestine Action is banned [Register at bit.ly/PalActionPlan]

SATURDAY 5TH JULY

00.01 [Subject to change]: If interim relief is not granted by the High Court, Palestine Action will become a proscribed organisation

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Email *

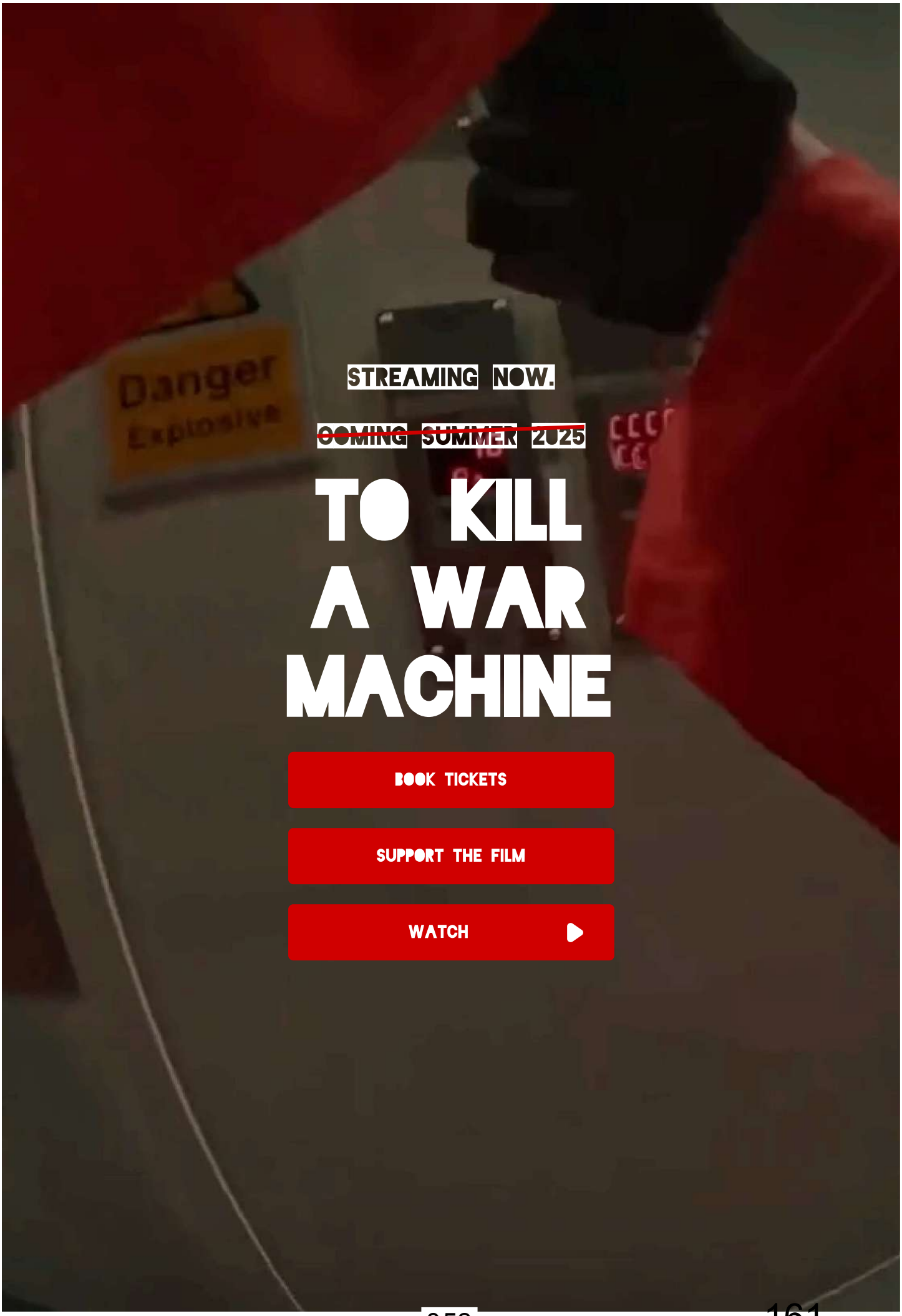
Not in GB?

SIGN UP

FUND THE MOVEMENT

Help grow the movement against the Israeli weapons industry

DONATE


Danger
Explosive
STREAMING NOW.
~~COMING SUMMER 2025~~
TO KILL A WAR MACHINE
BOOK TICKETS
SUPPORT THE FILM
WATCH

ABOUT THE FILM

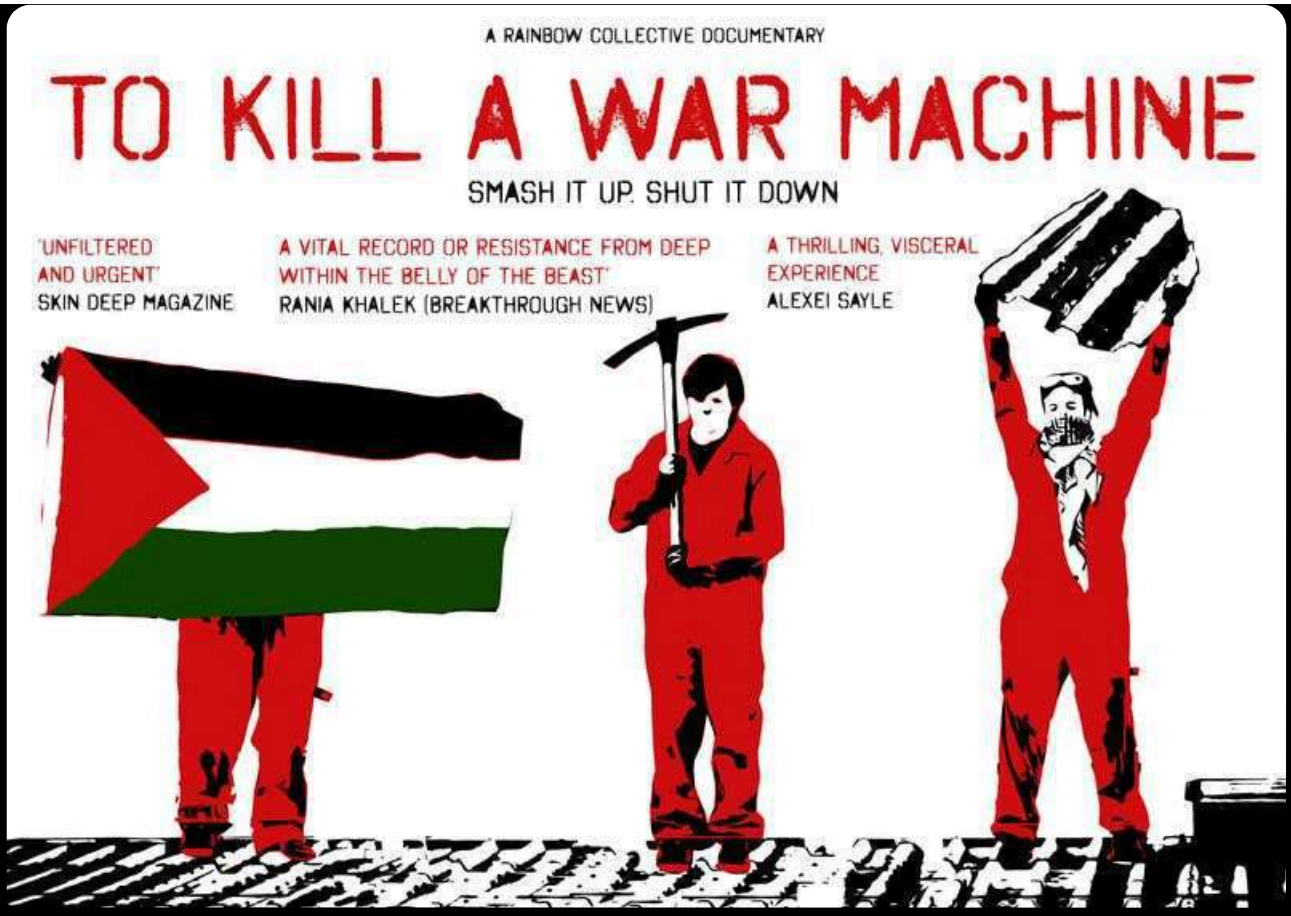
Through real-time bodycam and phone footage, frontline activists take audiences along on their audacious raids to tear down arms factories around the UK.

Since 2020, direct action group Palestine Action have documented their operations to dismantle the companies and infrastructure supplying weapons to the ongoing genocide in Gaza.

Independent film makers Rainbow Collective have combined this cache of footage with narration by the group's founders to follow the explosive growth of one of the world's most effective and confrontational protest groups, and the backlash activists face as they incur the wrath of the British state and the arms companies operating on their soil.

15 BBFC RATED 15

STREAM ONLINE



STREAM NOW

SUPPORT THE FILM

We are raising funds to distribute 'To Kill A War Machine' in the UK, USA and then worldwide. The film is ready for release, but in the current hostile climate we need your help to independently bring the film to cinemas. The more we raise, the more towns and cities the film can open in.

DONATE NOW

SCREENINGS

ROTHERHAM

1 JULY

DATE & TIME:
Tuesday 1 July 2025, 18:00

LOCATION:
Unity Centre, St. Leonards Road, Rotherham, S65 1PD

MORE INFO

CORNWALL

1 JULY

DATE & TIME:
Tuesday 1 July 2025, 18:00

LOCATION:
Redwing Gallery 32 Alverton Street Penzance TR18 2QN United Kingdom

BOOK TICKETS

MANCHESTER

1 JULY

DATE & TIME:
Tuesday 1 July 2025, 18:00

LOCATION:
Bridge 5 Mill, 22a Beswick Street, Manchester, M4 7HR

MORE INFO

LONDON – UCU

1 JULY

DATE & TIME:

Tuesday 1 July 2025, 18:30

LOCATION:

BLOC 1 Westfield Way #ArtsOne Building London E1 4PD

BOOK TICKETS

LUTON

1 JULY

DATE & TIME:

Tuesday 1 July 2025, 19:00

LOCATION:

Crescent Hall, 50 Dunstable Rd, Luton LU1 1EF

GLASGOW

1 JULY

DATE & TIME:

Tuesday 1 July 2025, 19:00

LOCATION:

The Ark, 70 Coplaw St, Glasgow, G42 7JG

LONDON

1 JULY

DATE & TIME:
Tuesday 1 July 2025, 19:00

LOCATION:
Space4, Finsbury Park

BOOK TICKETS

LONDON – SKIN DEEP

1 JULY

DATE & TIME:
Tuesday 1 July 2025, 19:00

LOCATION:
Staffordshire Street, SE15 5TJ

BOOK TICKETS

STROUD

1 JULY

DATE & TIME:
Tuesday 1 July 2025, 19:30

LOCATION:
Redz, 6 Threadneedle Street

MORE INFO

MANCHESTER

2 JULY

DATE & TIME:
Wednesday 2 July 2025, 18:00

LOCATION:
Bridge 5 Mill, 22a Beswick Street, Manchester, M4 7HR

MORE INFO

LEICESTER

2 JULY

DATE & TIME:
Wednesday 2 July 2025, 18:30

LOCATION:
Highfields Centre

LONDON

2 JULY

DATE & TIME:
Wednesday 2 July 2025, 18:30

LOCATION:
2 Hurlock St, London N5 1ED, GB

BOOK TICKETS

BELFAST

2 JULY

DATE & TIME:
Wednesday 2 July 2025, 19:00

LOCATION:
Cultúrlann, 216 Falls Rd, Belfast BT12 6AH

BRISTOL

3 JULY

DATE & TIME:

Thursday 3 July 2025, 17:00

LOCATION:

Waterside 3 Event Space, Watershed

BOOK TICKETS

MANCHESTER

3 JULY

DATE & TIME:

Thursday 3 July 2025, 18:00

LOCATION:

Bridge 5 Mill, 22a Beswick Street, Manchester, M4 7HR

MORE INFO

CORNWALL

3 JULY

DATE & TIME:

Thursday 3 July 2025, 18:00

LOCATION:

The Fish Factory Art Space, Commercial Road, Penryn TR10 8AG

BOOK TICKETS

SHEFFIELD

3 JULY

DATE & TIME:
Thursday 3 July 2025, 18:00

LOCATION:
Central United Reformed Church, 60 Norfolk Street, Sheffield S1 2JB

BOOK TICKETS

SURREY

3 JULY

DATE & TIME:
Thursday 3 July 2025, 18:30

LOCATION:
The Maybury Centre, 7 Board School Road, Woking GU21 5HD

BOOK TICKETS

BRISTOL

3 JULY

DATE & TIME:
Thursday 3 July 2025, 19:00

LOCATION:
Waterside 3 Event Space, Watershed

BOOK TICKETS

MANCHESTER

4 JULY

DATE & TIME:
Friday 4 July 2025, 18:00

LOCATION:
Bridge 5 Mill, 22a Beswick Street, Manchester, M4 7HR

MORE INFO

BELFAST

4 JULY

DATE & TIME:
Friday 4 July 2025, 20:00

LOCATION:
The (A) Centre, 6 Wellington Court, Belfast BT1 6HW

LONDON

9 JULY

DATE & TIME:
Wednesday 9 July 2025, 18:00

LOCATION:
The Orange Room, 375 High St, London E15 4QZ

BOOK TICKETS

NEWTOWN NSW, AUSTRALIA

17 JULY

DATE & TIME:
Thursday 17 July 2025, 18:00

LOCATION:
Dendy Cinemas Newtown, Newtown NSW, Australia

BOOK TICKETS

LONDON – UK PREMIERE

18 JULY

DATE & TIME:
Friday 18 July 2025, 19:00

LOCATION:
Rich Mix, 35-47 Bethnal Green Road, London E1 6LA

BOOK TICKETS

BRADFORD

25 JULY

DATE & TIME:
Friday 25 July 2025, 19:00

LOCATION:
Cineworld Bradford, Vicar Lane Bradford BD1 5LD

BOOK TICKETS

SHEFFIELD

28 JULY

DATE & TIME:
Monday 28 July 2025, 19:00

LOCATION:
Cineworld Sheffield, Boughton Lane, Sheffield S9 2EP

BOOK TICKETS

CANTERBURY

3 AUGUST

DATE & TIME:
Sunday 3 August 2025, 19:00

LOCATION:
Gulbekian Arts Centre, University of Kent, Canterbury CT2 7NB

BOOK TICKETS

BRIGHTON

5 AUGUST

DATE & TIME:
Tuesday 5 August 2025, 19:00

LOCATION:
Cineworld Brighton, Brighton Marina, Brighton and Hove BN2 5UF

BOOK TICKETS

BOOMTOWN FAIR - HAMPSHIRE

8 AUGUST

DATE & TIME:
Friday 8 August 2025, 10:00

LOCATION:
Boomtown Fair, Reel News Tent, Thrutopia, Matterly Estate, Hampshire SO21 1HW

BOOK TICKETS

LIVERPOOL

13

AUGUST

DATE & TIME:
Wednesday 13 August 2025, 19:00

LOCATION:
The Casa Bar, 29 Hope Street, Liverpool L1 9BP

BOOK TICKETS

LIVERPOOL

18 AUGUST

DATE & TIME:
Monday 18 August 2025, 19:00

LOCATION:
FACT Liverpool, 88 Wood Street, Liverpool L1 4DQ

BOOK TICKETS

BIRMINGHAM

20 AUGUST

DATE & TIME:
Wednesday 20 August 2025, 19:00

LOCATION:
Midlands Arts Centre, Cannon Hill Park, Birmingham B12 9QH

BOOK TICKETS

WATCH TEASER 1

WATCH TEASER 2

STAY UPDATED

Sign up to our newsletter to get updates on the release and screenings.

19:57

RESISTTHEBAN
Posts

resisttheban and 2 others
♫ Llunr · Wake Up

2,750 47 136

resisttheban The protest is continuing outside the Royal Courts of Justice, despite police brutality against those taking part.

We are expecting a decision any minute. However, if it doesn't go our way, we MAY appeal TONIGHT.

If you can, get down to the protest now. It may be a long evening of resistance.

Photos by Novapix

2 hours ago

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Llunr · Wake Up

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2 hours ago

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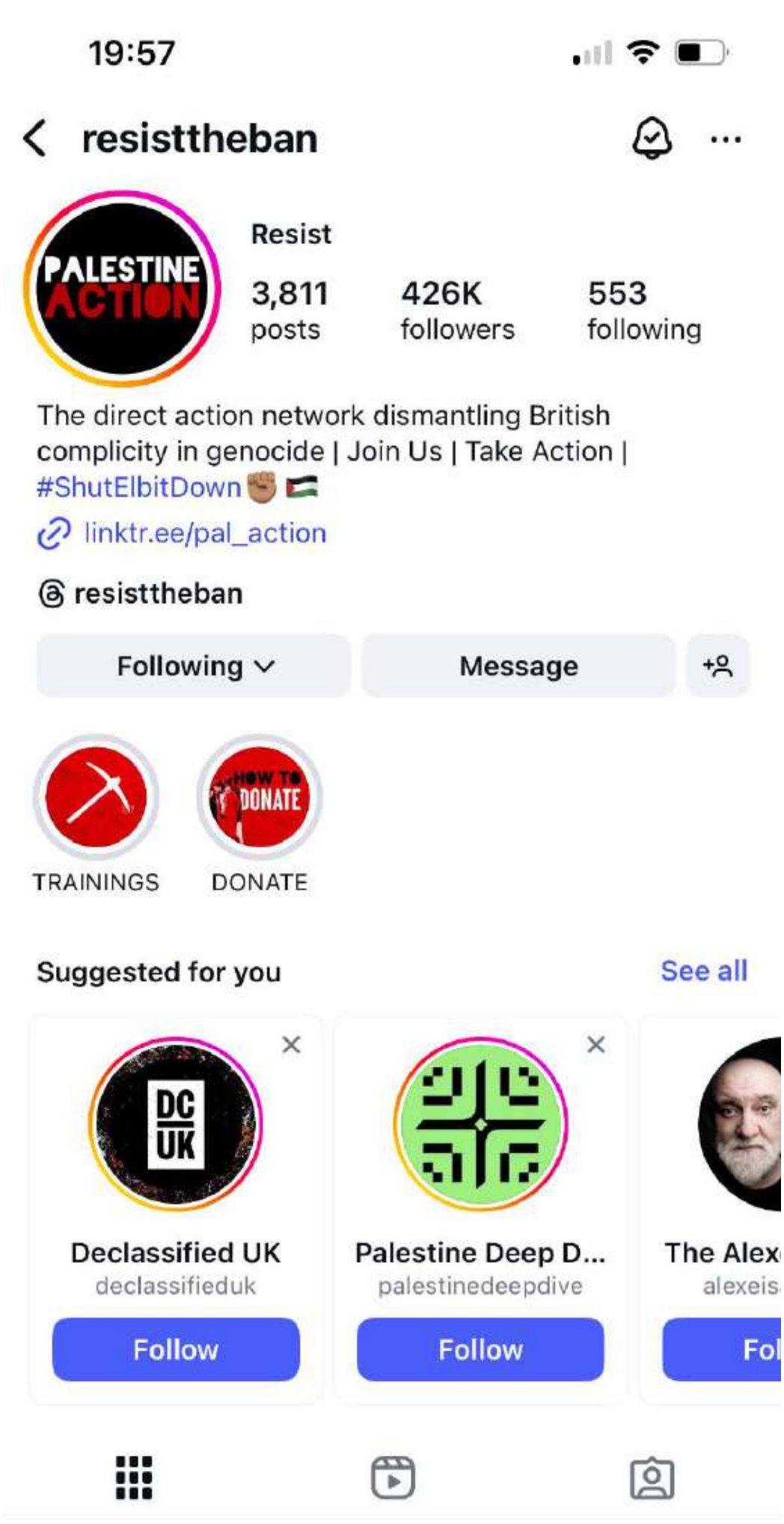
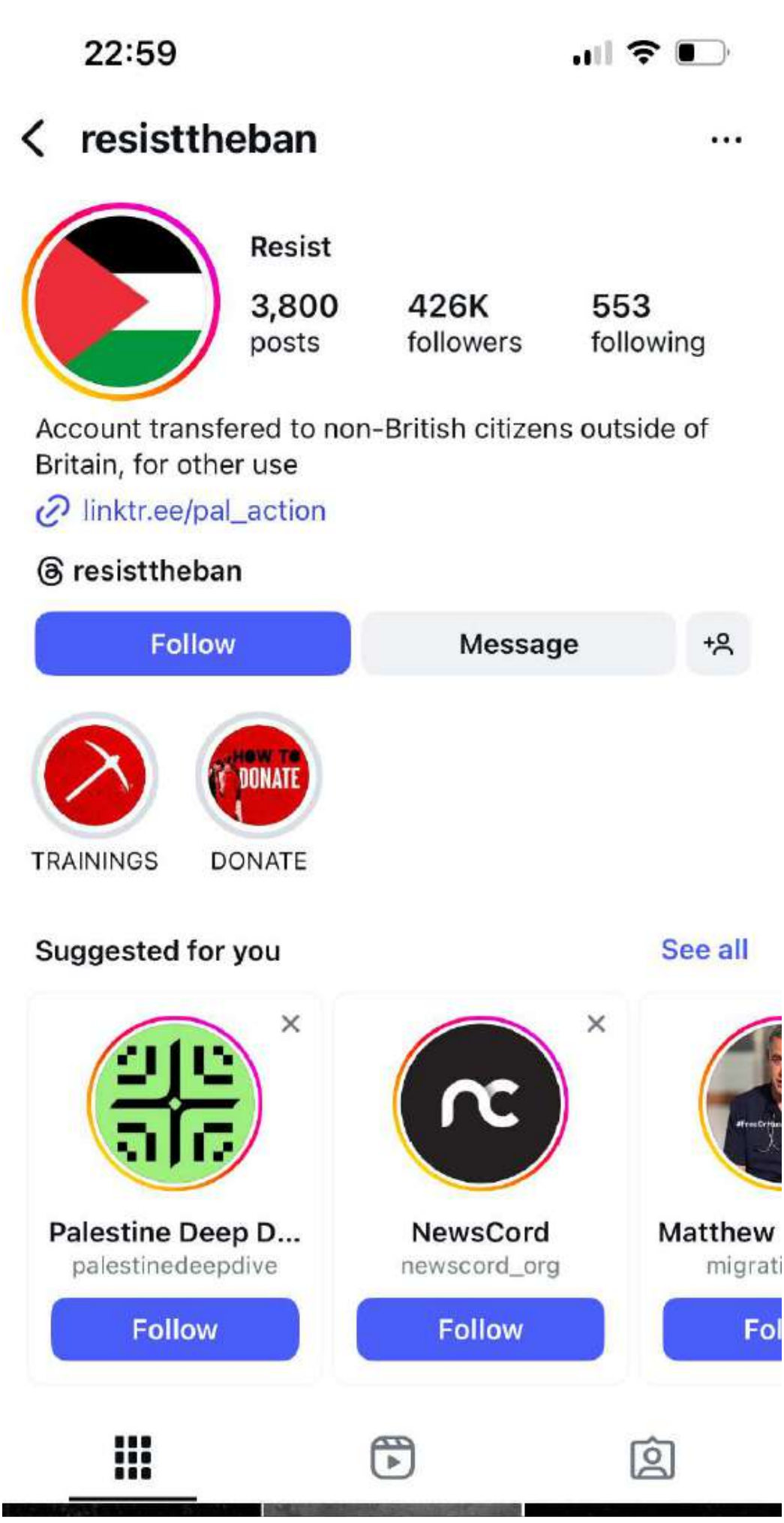
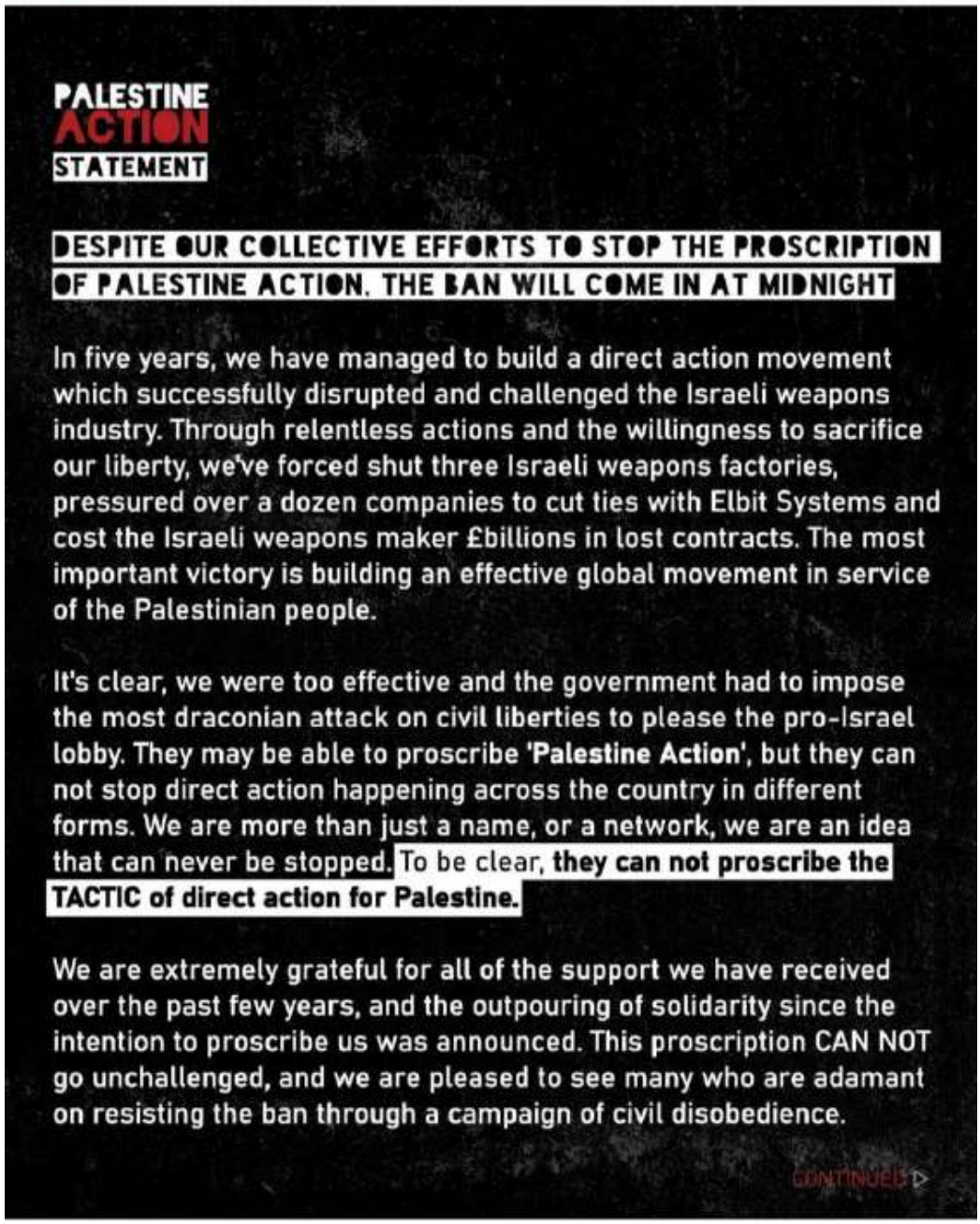
2 hours ago

resisttheban


19:57
resistheban
PALESTINE ACTION
Resist
3,811 posts
426K followers
553 following
The direct action network dismantling British complicity in genocide | Join Us | Take Action | #ShutElbitDown
linktr.ee/pal_action
resistheban
Following
Message
TRAININGS
DONATE
Suggested for you
See all
DC UK
Declassified UK
declassifieduk
Follow
Palestine Deep D...
palestinedeepdive
Follow
The Alex
alexeis
Fol


22:59
resisttheban
Resist
3,800
posts
426K
followers
553
following
Account transfered to non-British citizens outside of Britain, for other use
linktr.ee/pal_action
resisttheban
Follow
Message
HOW TO DONATE
TRAININGS
DONATE
Suggested for you
See all
Palestine Deep D...
palestinedeepdive
Follow
NewsCord
newscord_org
Follow
Matthew
migrati
Fol

resisttheban and cageinternational

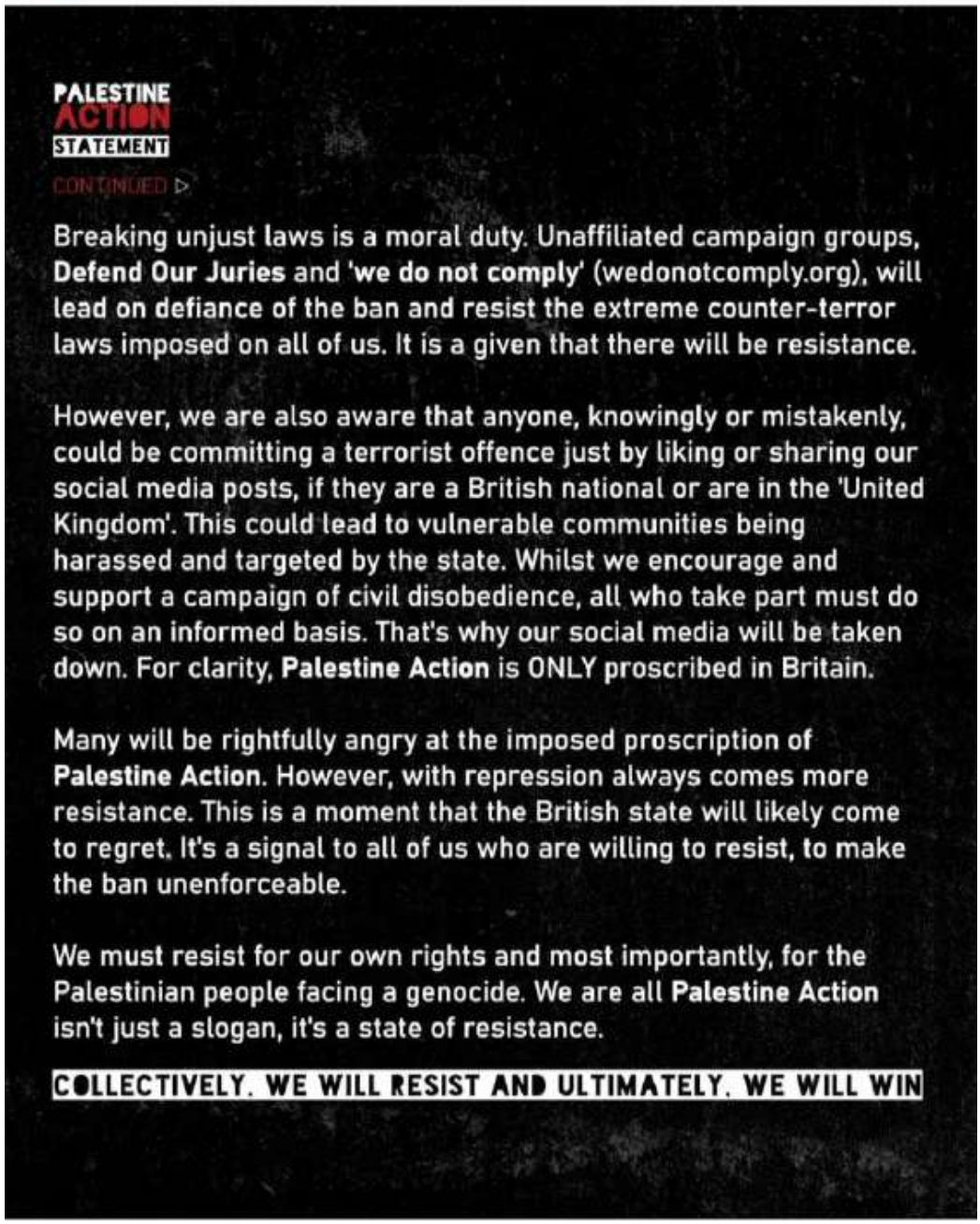


8,709 294

resisttheban Palestine Action will be proscribed at midnight. Our statement.

59 minutes ago

resisttheban and cageinternational



8,709 294

resisttheban Palestine Action will be proscribed at midnight. Our statement.

59 minutes ago

Police arrest 29 protesters on suspicion of terror offences after Palestine Action banned

The protest group was officially classified as a terrorist organisation from midnight on Saturday after the measure received overwhelming support from MPs and following the failure of a last-minute legal challenge to delay it.

Saturday 5 July 2025 22:21, UK

Why were protesters arrested outside Parliament?

Why you can trust Sky News >

Police have arrested 29 protesters on suspicion of terror offences after a ban on the Palestine Action group came into effect.

The protest group was **officially proscribed as a terrorist organisation** from midnight on Saturday after a last-minute legal challenge at the Court of Appeal to delay it failed.

The Metropolitan Police said on Saturday afternoon that the protesters had been held on suspicion of committing offences under the Terrorism Act 2000 following a protest in London's Parliament Square.

"The group is now proscribed and expressing support for them is a criminal offence," the force added. "Arrests are being made."

MPs overwhelmingly **voted in favour** of Home Secretary Yvette Cooper's decision to ban the protest group under the legislation **on Wednesday** and the House of Lords approved the move the following day.

Pic: PA

Police remove 83-year-old Reverend Sue Parfitt from the protest in London. Pic: PA

The law change adds **Palestine Action** to the list of banned organisations along with the likes of al Qaeda, ISIS and Hezbollah, and makes membership of, or support for, the direct action group a criminal offence punishable by up to 14 years in prison.

Even wearing a T-shirt or badge with the group's name on attracts a maximum six-month sentence.

On Saturday, a large number of Metropolitan Police officers circled around dozens of protesters carrying placards that said: "I oppose genocide. I support Palestine Action."

Israel has strongly denied any allegations of genocide.

Campaign group Defend Our Juries said demonstrators were set to gather in Parliament Square on Saturday holding signs supporting Palestine Action.

Officers remove people from a protest by the Defend Our Juries group. Pic: PA

Officers who attended the protest were met with cries of "Met Police you are puppets of the Zionist state" and "leave them alone".

Others were heard shouting, "British police off our streets", and "from the river to the sea, Palestine will be free".

Chants of "shame" were directed at police.

A woman seen lying on the floor in handcuffs was carried away by officers and put in a police van.

Protesters gathered in Parliament Square

Sue Parfitt talking to police at the protest

She was heard saying: "Free Palestine, stop the genocide, I oppose genocide, I support the rights of the Palestinian people, I support freedom of speech, I support freedom of assembly."

A large group of people crowded around to film the scene.

Officers placed her in a vehicle before returning to the square's Mahatma Gandhi statue.

The protest started at about 1.10pm and officers were seen taking people away shortly after 1.30pm. Most of the officers dispersed at around 2.10pm.

'Creeping totalitarianism'

Leslie Tate, 76, a Green councillor from Hertfordshire, said the group is not a violent organisation, and the proscription is wrong, adding the protest

was "necessary to defend our democracy, and this is the creeping edge of totalitarianism".

Among those removed by police was Reverend Sue Parfitt, who is 83.

Ms Cooper announced plans to proscribe Palestine Action after **two Voyager aircraft were allegedly damaged at RAF Brize Norton in Oxfordshire on 20 June**, which police said caused around £7m worth of damage.

A placard at the protest

Police said the protesters were breaking the law as the group is now banned

T-shirt could bring six-month jail term

Even wearing a T-shirt or badge with the group's name on attracts a maximum six-month sentence.

On Friday, the High Court heard the decision to ban the group was taken before the aircraft were allegedly damaged and as early as March this year.

Huda Ammori, the co-founder of Palestine Action, is seeking to bring a legal challenge against the Home Office with a hearing for permission to bring a judicial review set to take place during the week of 21 July.

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On Friday, her lawyers applied for "interim relief" to temporarily block the legislation from coming into force until that hearing, arguing the Irish author Sally Rooney, who wrote Normal People, was among supporters who fear the "ramifications".

But three judges, including the Lady Chief Justice Baroness Carr, refused a bid to pause the ban coming into effect pending any Supreme Court bid at about 10.30pm on Friday, less than two hours before the ban was due to come into force.

Read more on Sky News:
Palestine Action proscribed - but what does that mean?
Oasis reunion 'all about the music'
Liverpool stars at Jota's funeral

In their judgment, the judges said: "The role of the court is simply to interpret and apply the law.

"The merits of the underlying decision to proscribe a particular group is not a matter for the court... Similarly, it is not a matter for this court to express any views on whether or not the allegations or claims made by Palestine Action are right or wrong."

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Parliament Square

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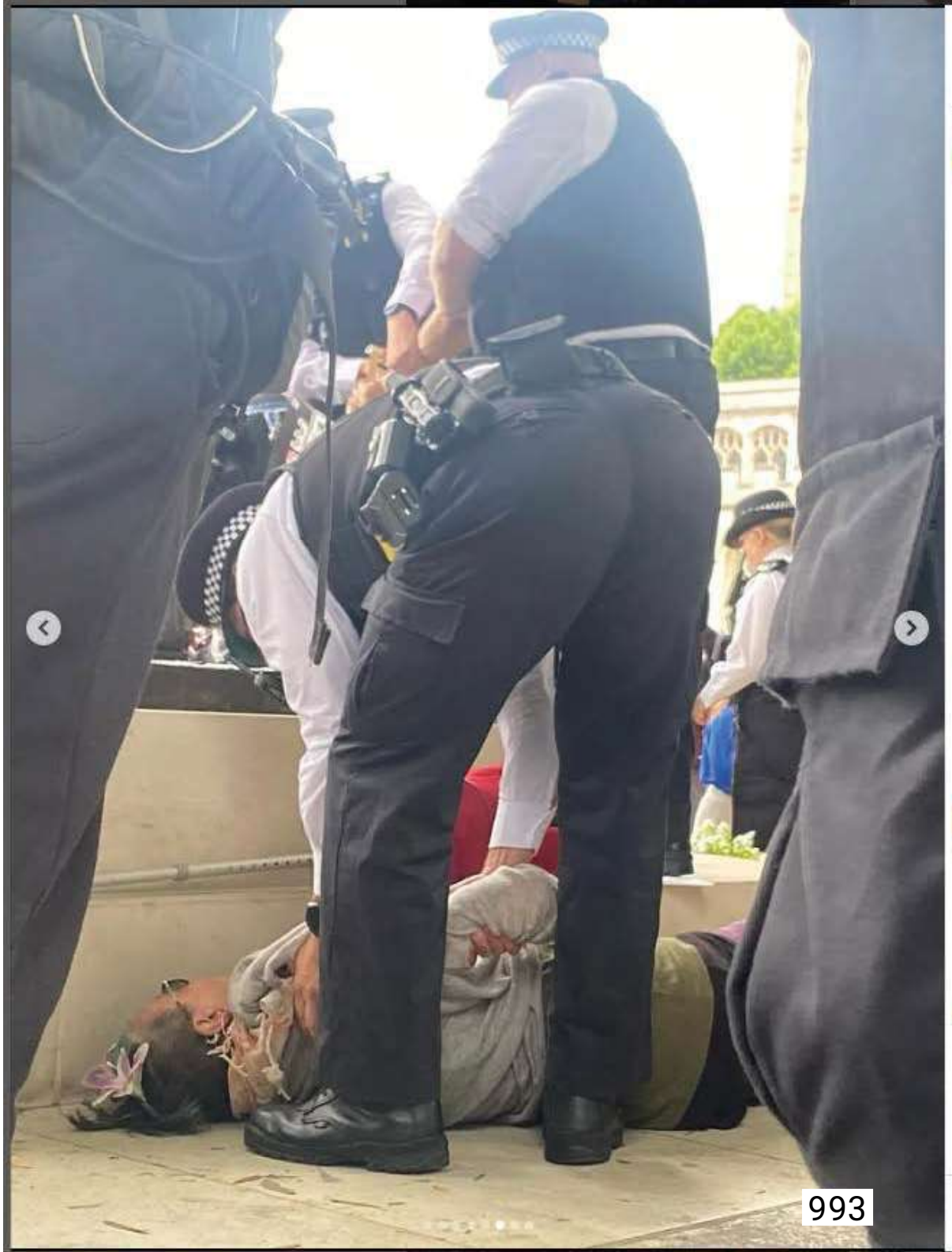

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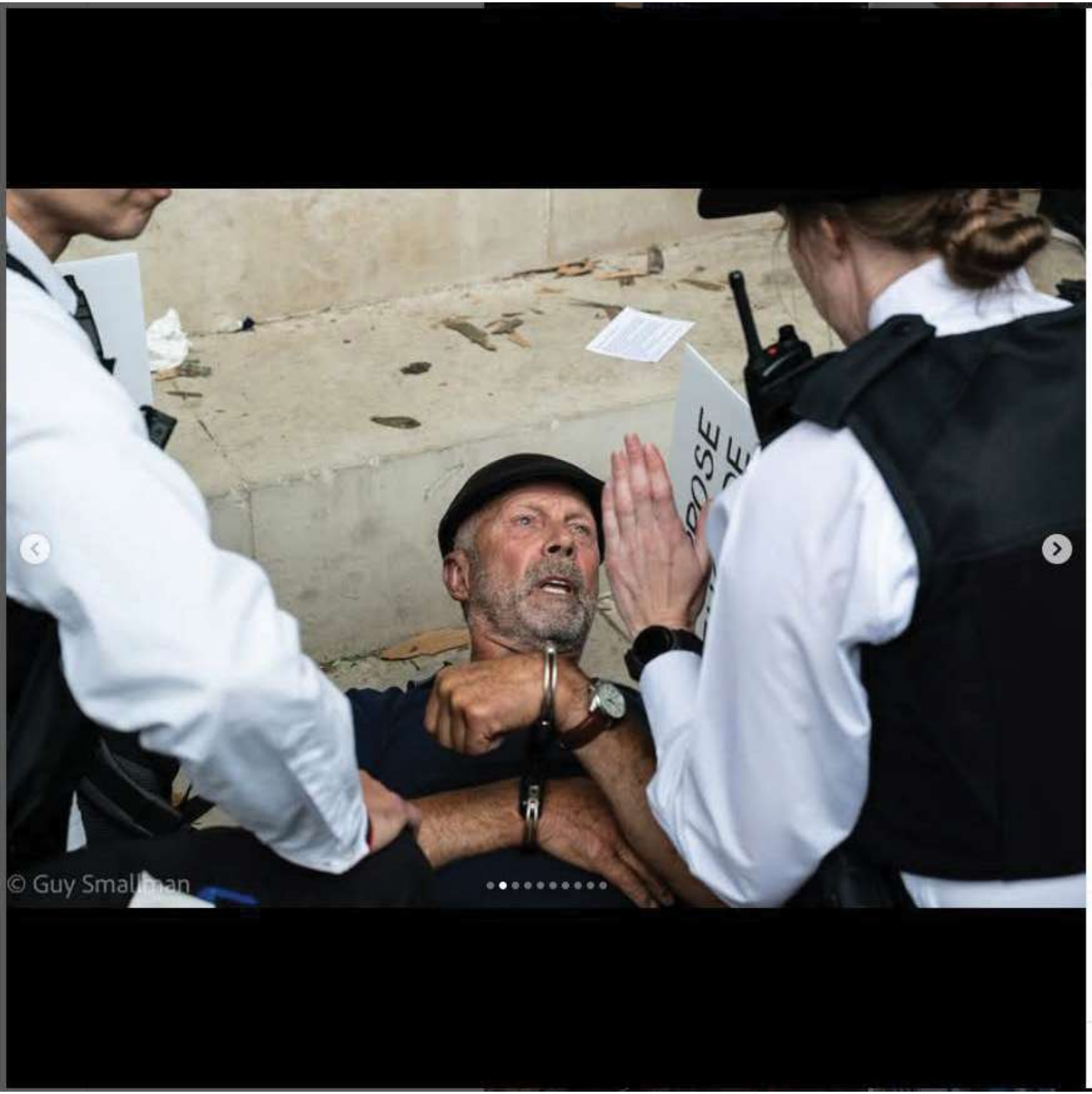

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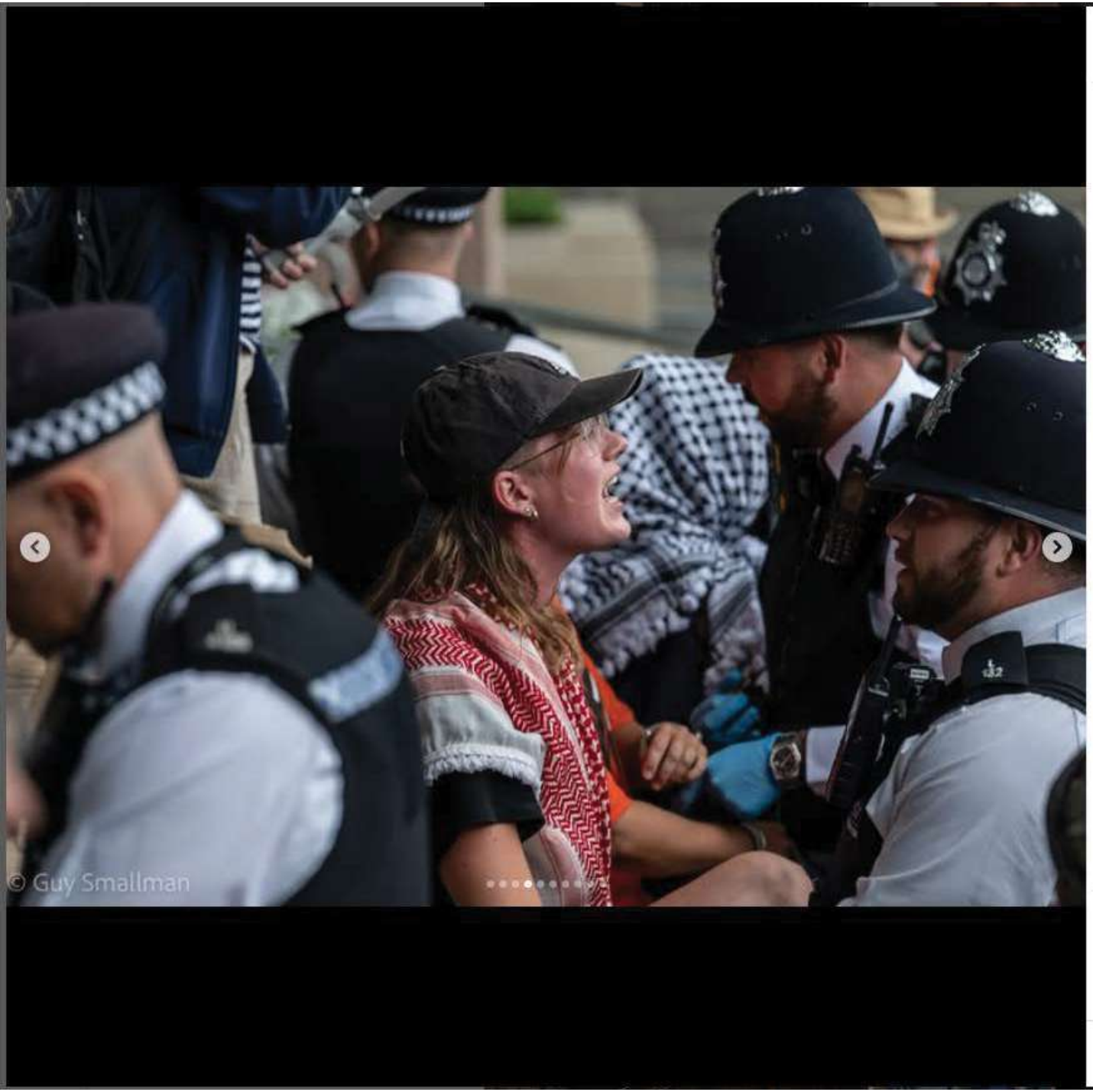

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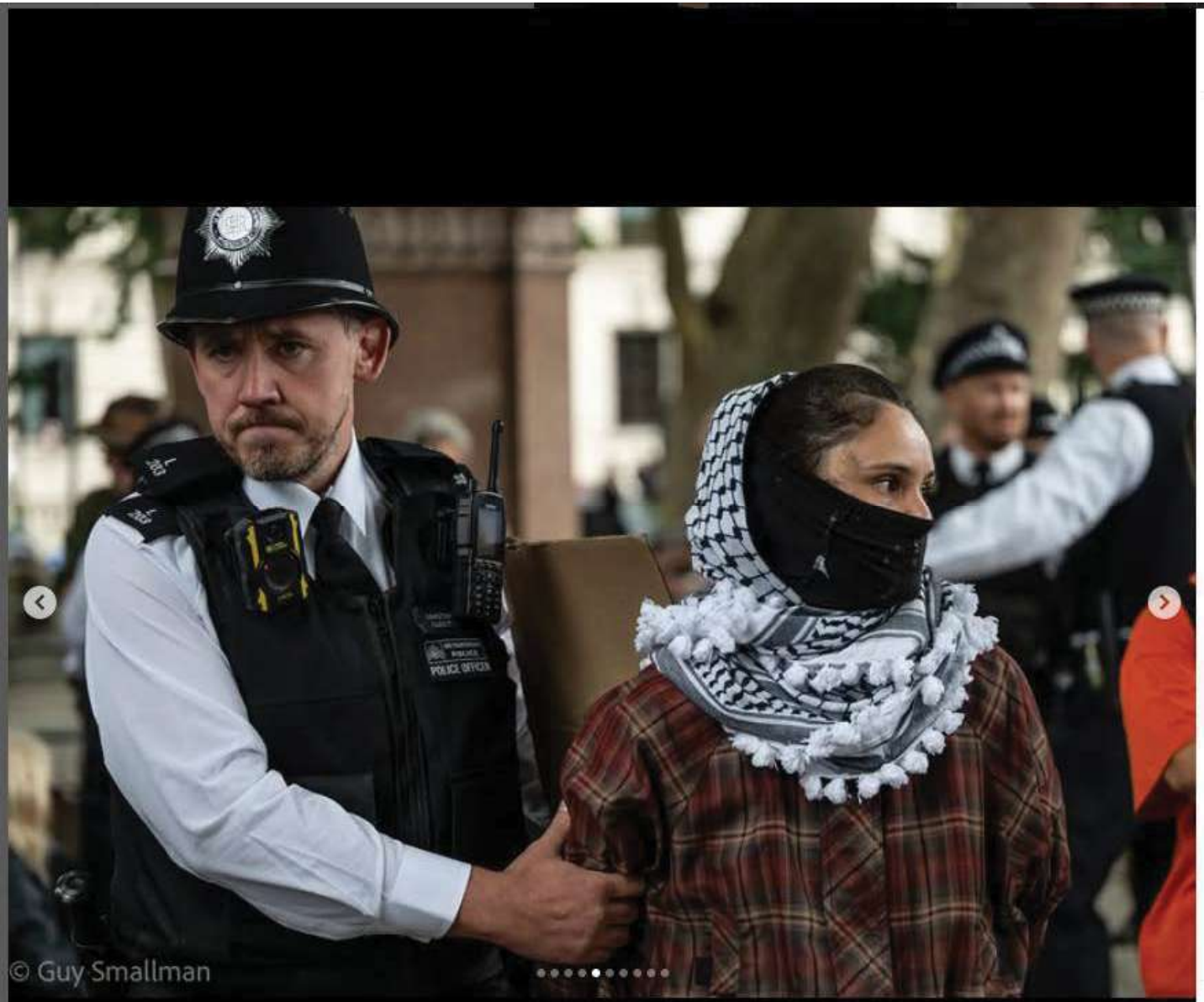

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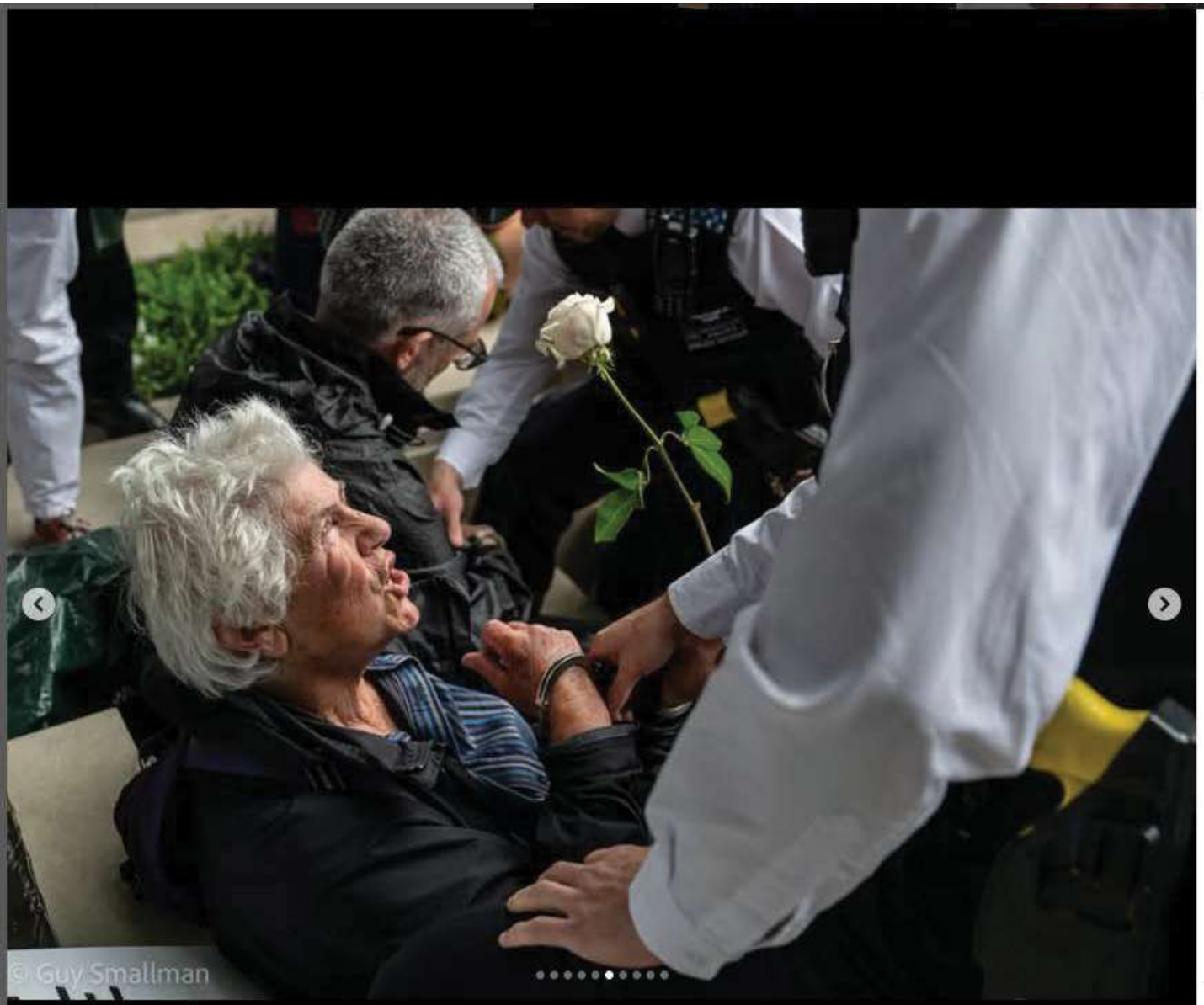

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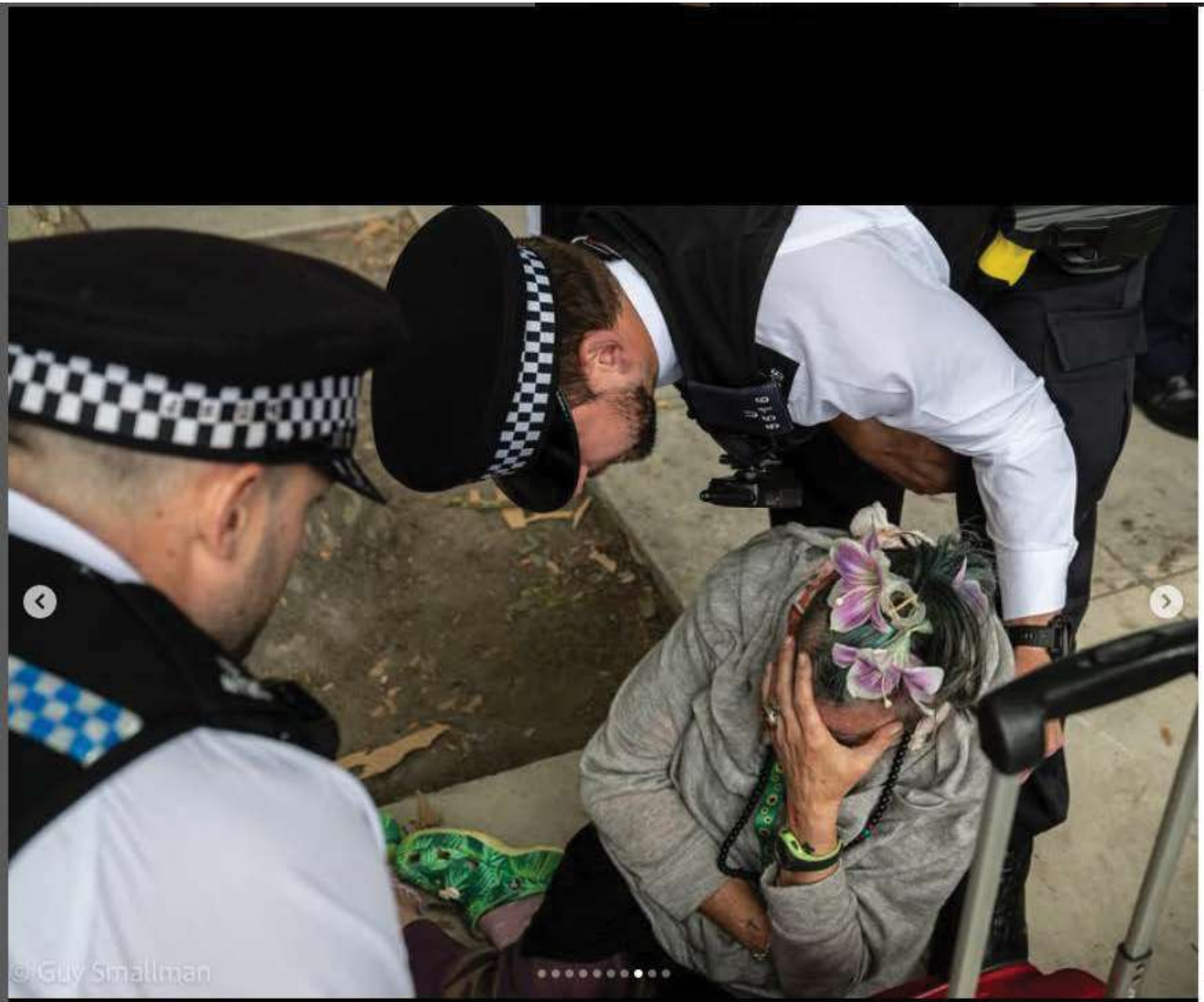

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27 ARRESTED FOR TERRORISM ACT OFFENCES IN PARLIAMENT SQUARE

A group of 27 people, including a priest, an Emeritus Professor and a number of health professionals, have been arrested in Parliament Square for offences under the Terrorism Act.

They were sitting by the statue of Gandhi, holding home-made cardboard signs, saying:

> **“I oppose genocide. I support Palestine Action”.**

Had they done the same thing yesterday, few would have noticed, but today the Government’s new order came into force, proscribing Palestine Action as a ‘terrorist’ organisation. Palestine Action is a direct action group which aims to stop arms being trafficked from the UK to support the genocide in Gaza, including by using red spray paint to protest against the use of RAF planes in supporting the Israeli military.

It is now an offence under the Terrorism Act to express support for Palestine Action.

Yesterday, the group wrote to the Met Commissioner, Sir Mark Rowley, to warn of their action [1]:

> **“We would like to alert you to the fact we may be committing offences under the Terrorism Act tomorrow, Saturday 5 July, in Parliament Square at about 1pm.**
>
> **We do not intend to cause you any alarm. We are committed to nonviolence and there is no risk whatsoever of anyone being harmed.”**

A spokesperson for Defend Our Juries said:

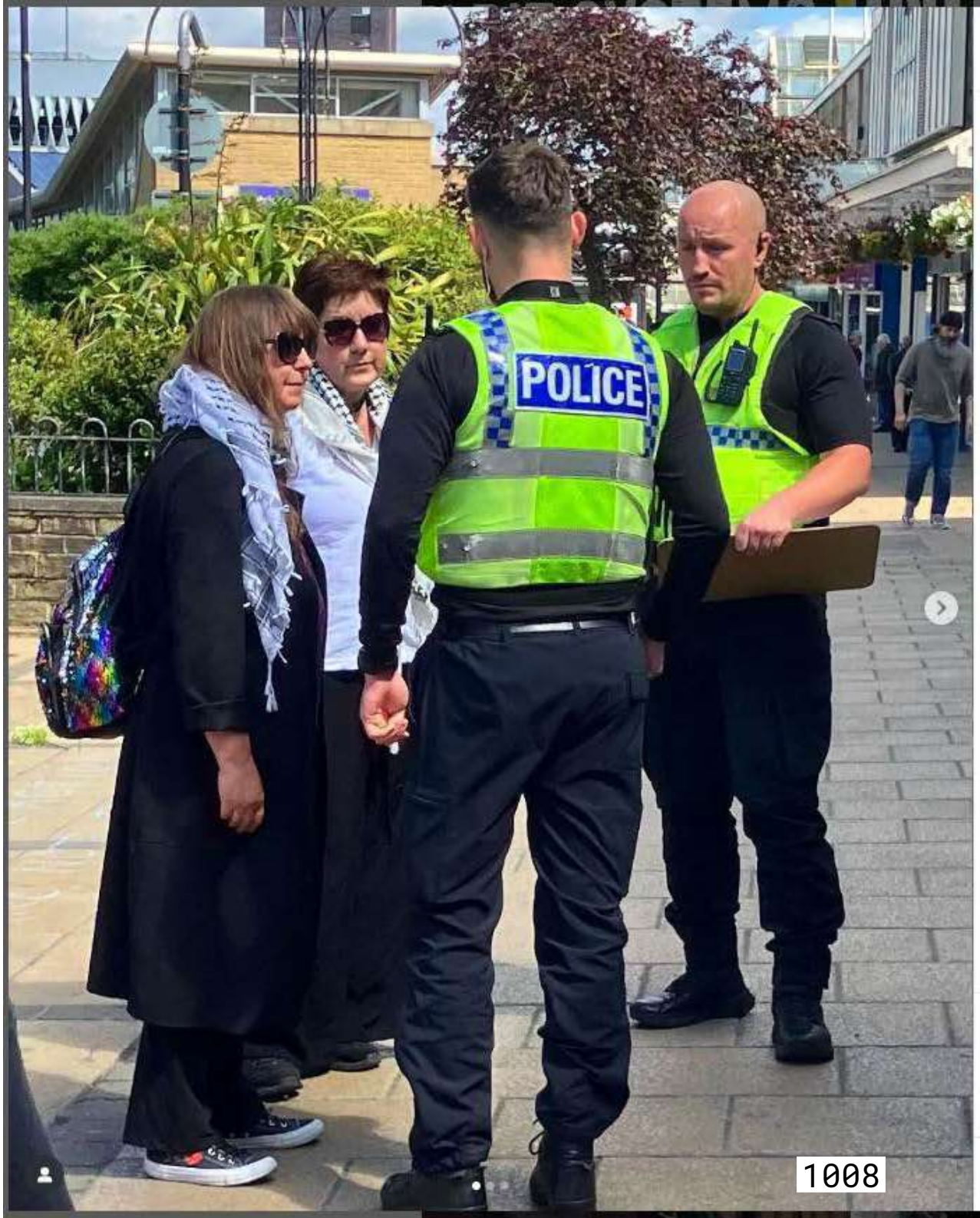
> **“We commend the Counter Terrorism police for their decisive action in protecting the people of London from some cardboard signs opposing the genocide in Gaza and expressing support for those taking action to prevent it. It’s a relief to know that Counter Terrorism police have nothing better to do”**

Further such actions are expected to follow shortly.

[1] https://docs.google.com/document/d/1c-JrTDNpXMH9OsFVuGUuvtUbgbg9Gcrad4TNy-5njEg/edit?tab=t.0

ENDS

For further info:
[Paddy +447736526143; Frieda +447576878834]
Email: defendourjuries@protonmail.com



1008

defendourjuries and **just.stopoil**

defendourjuries Another two arrest took place in Bradford for holding a "We are all Palestine Action" sign at a Bradford Friends of Palestine event on Saturday.

This brings the arrest total in support of Palestine Action to 111 since Labour's ban.

We stand with Maggie and Corinna.

Wherever a person is arrested for opposing Labour's ridiculous and totally unenforceable ban on direct action groups taking action to prevent genocide, multiple people show up at police stations in support.

The snowball is beginning to roll. Are Labour ready for the avalanche?

With the release under investigation of the Bradford two, we can confirm that all of the 111 people arrested for holding signs in support of Palestine Action have been released.

Reports coming in of people handing themselves in at police stations...

2d

hex_tarot Corrina is a dear friend! And I can categorically state that she has never incited hate or violence towards any human or other living thing. She's the kindest most intellectual and intelligent person I've ever met. These charges are ludicrous and disgraceful.

2d 46 likes Reply

View replies (5)

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realmediauk and **defendourjuries**
London, United Kingdom

realmediauk Last week, 29 people were arrested in London under Section 13 of the Terrorism Act 2000, but none have yet been charged.

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 entity by the Home Secretary Yvette Cooper (who has received hundreds of thousands of pounds funding from pro-Israel lobbyists).

Protests organised by @defendourjuries

2d

greycourt2 I don't think Nelson Mandela or the Suffragettes would have approved. Stop misbehaving, toe the line. That's the sort of thing they'd have said if they'd been there today. They definitely wouldn't have been fans of PSPSPS. No way.

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jbay.si Can. U share it. @london.locality

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325 likes
2 days ago

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More than 70 arrests at protests over Palestine Action ban

Demonstrations are held in London, Manchester, Cardiff and Leeds over the group being added to a list of proscribed terrorist groups.

Saturday 12 July 2025 22:43, UK

Police officers remove a person after they took part in a protest in Parliament Square. Pic: PA

Why you can trust Sky News >

More than 70 people have been arrested at protests against Palestine Action being designated a proscribed terrorist group.

Protesters gathered for the second week in a row in central London, where the Metropolitan Police made 42 arrests.

Other demonstrations took place around the UK, including in Manchester, where police said 16 arrests were made, in Cardiff, where South Wales Police arrested 13 people, and in Leeds, where West Yorkshire Police made one arrest.

In London, two groups of protesters gathered underneath statues of Mahatma Gandhi and Nelson Mandela in Parliament Square, shortly before 1pm.

They wrote the message "I oppose genocide, I support Palestine Action" on pieces of cardboard and silently held the signs in the air as they were surrounded by police officers and members of the media.

Police officers remove a person. Pic: PA

Police with demonstrators in Parliament Square. Pic: PA

Some demonstrators could be seen lying on top of each other on the floor as police searched their bags, and took their ID cards and signs.

Officers then carried away a number of protesters, lifting them off the ground and into waiting police vans.

The last protester was lifted from the Nelson Mandela statue shortly after 2.30pm.

Forty-one of the 42 arrests at the London protest were for showing support for a proscribed organisation, while one person was arrested for common assault, the Met Police said.

Advertisement

Read more:
Palestine Action has been proscribed - but what does that mean?

People take part in a protest in Parliament Square, London. Pic: PA

Palestine Action's terror group designation means membership of, or support for, the group is a criminal offence punishable by up to 14 years in prison.

Greater Manchester Police said it had arrested 16 people under the Terrorism Act 2000 after responding to a protest in St Peter's Square at around 2.30pm.

Police lead a protester away in Manchester

South Wales Police confirmed 13 people were arrested on suspicion of offences under the same act in the vicinity of Central Square in Cardiff.

West Yorkshire Police said a person was arrested in Leeds on suspicion of demonstrating support for Palestine Action.

The Met Police **arrested 29 people** at a similar protest last weekend.

Read more from Sky News:

Tennis star in tears after crushing Wimbledon defeat

Care whistleblower could face removal from Britain

Scotland Yard has said its stance remains that officers will act where criminal offences, including support of proscribed groups or organisations, are committed.

It added that this includes "chanting, wearing clothing or displaying articles such as flags, signs or logos".

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The move to ban Palestine Action came after **two aircraft were damaged** at RAF Brize Norton in Oxfordshire last month.

Police said the incident caused around £7m worth of damage.

Related Topics

Greater Manchester | London | Wales

Three women arrested under Terrorism Act after van driven into Edinburgh factory fence owned by defence company

A pro-Palestine action group, which aims to close defence company Leonardo's Edinburgh plant, said it is "taking action to shut down Leonardo's weapons factory".

Tuesday 15 July 2025 20:27, UK

Aftermath of a van crashing into a fence outside Leonardo's Edinburgh factory. Pic: Shut Down Leonardo / X

Why you can trust Sky News >

Three women have been arrested under the Terrorism Act after a van was driven into an Edinburgh-based defence company's fence.

Police Scotland said the three women - aged 31, 34 and 42 - were arrested after a disturbance in the Crewe Road North area of **Edinburgh** on Tuesday.

The force said a van was driven into an external fence of a business premises, and that its Counter Terrorism Unit was leading the investigation.

It added: "Enquiries are ongoing. We are treating this as targeted, and we do not believe there is any wider threat to the public."

Direct action campaign group Shut Down Leonardo - which said it aims to target aerospace, defence and security company Leonardo's headquarters in Edinburgh - posted a photo of the van.

It shows police on the roof of the vehicle, which has a Palestine flag hanging off the back.

Shut Down Leonardo claims the factory makes components for Israel's F-35 fighter jets.

MORE ON EDINBURGH

Stephen Doohan: Paramedic who secretly gave pregnant woman abortion drug jailed for more than 10 years

Liam Gallagher hits out at Edinburgh council after Oasis fans branded 'rowdy'

Women's centre founded by Harry Potter author JK Rowling to host conference on internet pornography

Related Topics:

Edinburgh | Protest | Scotland | Terrorism

In a separate post, the group said "we're taking action to shut down Leonardo's weapons factory in Edinburgh" and shared a video of an "action taker" explaining why the site has been targeted.

Read more:

Palestine Action has been proscribed - what does that mean?

John Torode sacked from MasterChef

Doctor among four people killed in Southend Airport plane crash

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A Leonardo spokesperson told the PA news agency: "Leonardo UK is subject to UK government export controls and does not supply equipment direct to Israel.

"The right to peaceful protest is an important principle in our society, however, aggressive and violent activity should have no place in protest.

"The intimidation of our people, who work hard to support the security and defence of the UK, is not acceptable.

"Our main customer is the UK Armed Forces. We are proud to manufacture technology that supports our service personnel and helps keep them safe. Their dedication underpins the freedom on which our society is based."

Palestine Action - now **proscribed as a terrorist group** - had also targeted Leonardo's Edinburgh site, cutting off the electricity supply to the factory in March.

Related Topics

Edinburgh | Protest | Scotland | Terrorism

shutdownleonardo Follow

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Shut Down Leonardo Edinburgh
This is a direct action campaign, not a statement
The target is Leonardo's Edinburgh factory: A producer of laser... more

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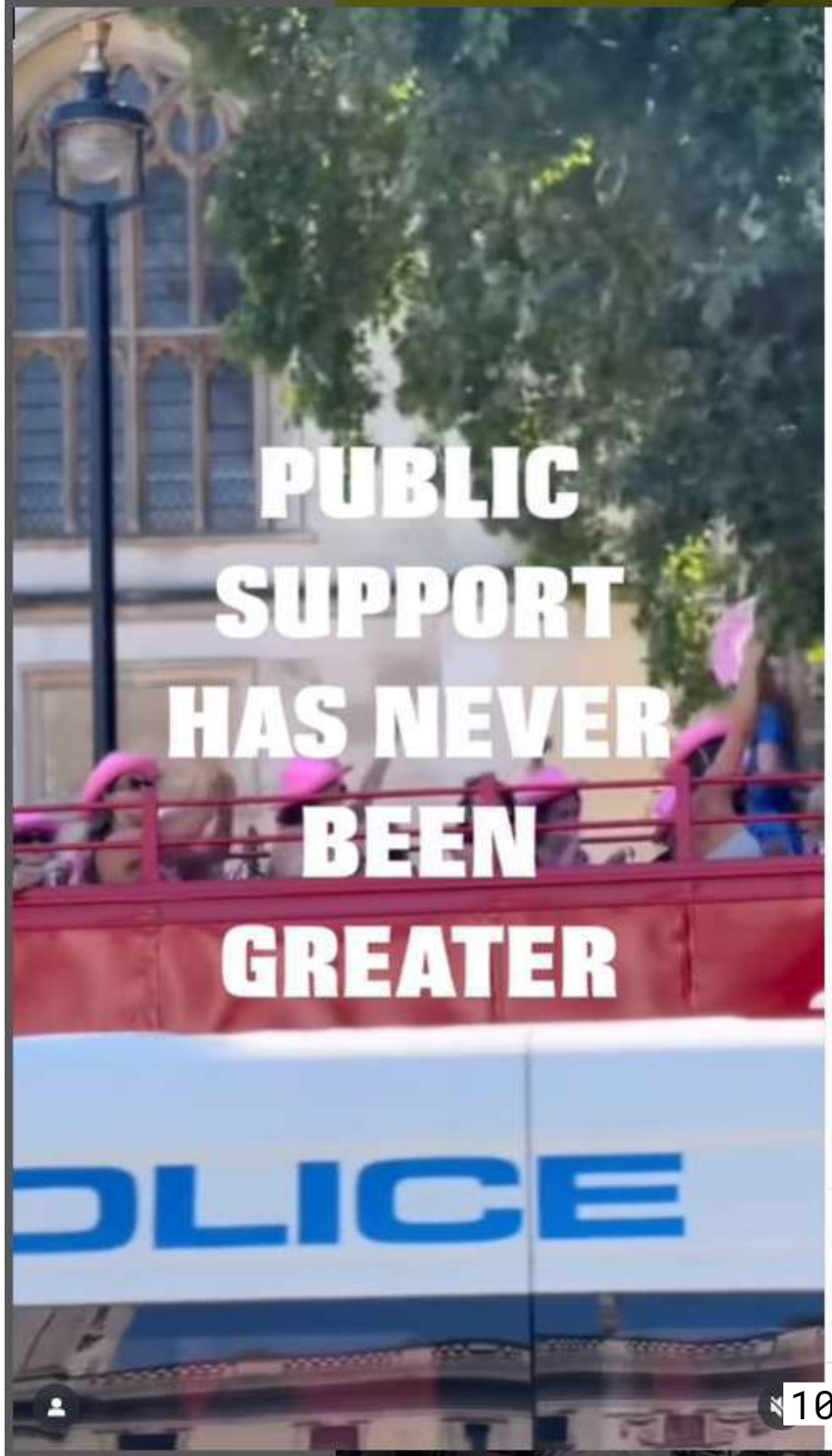
Special Rapporteur Francesca
nese's report names more than 60
panies said to play a role in 'sustaini
el's settler-colonial project'.



defendourjuries and **europe.palestine.network**
Original audio

defendourjuries Here's how the state responds to peaceful protest, despite overwhelming support from the public against Israel's genocide on Gaza.

Women enjoying a hen party took time out to show support to 49 peaceful sign-holders as they were carried to police vans in London.

In Manchester, 16 peaceful sign-holders were dragged off the streets as the police violently burst through supportive crowds.

In Caerdydd (Cardiff), 13 peaceful sign-holders were removed from the entrance to the BBC Cymru HQ, their houses raided, and held in cells for over 30hrs, including an 86yr old man who uses two canes to walk.

All 76 arrested on Saturday under accusation of "terrorism", for supporting those who use direct action to oppose genocide.

This is what happens when the state is nervous. They lash out.

Sign up for action on July 19th (link in @defendourjuries insta bio): https://actionnetwork.org/forms/get-involved-in-july-2025-onwards-local-action

1d

gjsmeenk Well done brave and courageous people ❤️❤️❤️❤️❤️❤️

1d 118 likes Reply

View replies (1)

orangeturtlebakery Huge respect (from Canada)!

4,574 likes
1 day ago

Add a comment...

Bringing down the terrorism laws

"WE DO NOT COMPLY"

What is happening

The British government has attempted to ban Palestine Action, the direct action network, from operating in England, Wales, Scotland and Occupied Ireland.

From 00:01 on Sat 5th July, direct action network Palestine Action will be classed as a terrorist organisation alongside the likes of ISIS and National Action. This is one of, if not the, most draconian attack of everyone's freedom of speech and right to dissent in this country. We will not comply with unjust laws.

Civil Disobedience

One may well ask: "How can you advocate breaking some laws and obeying others?" The answer lies in the fact that there are two types of laws: just and unjust. I would be the first to advocate obeying just laws. One has not only a legal, but a moral responsibility to obey just laws. Conversely, one has a moral responsibility to disobey unjust laws. I would agree with St. Augustine that "an unjust law is no law at all."

- *Martin Luther King, Jr.*

The Plan

We 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 lawbreaking is the heart of classical civil disobedience. The law you disagree with, you break en-masse.

The most effective, powerful and damaging to the state is mass civil disobedience all together in one place. This has power both visually, from a media perspective and also from a problem for the state. Arresting a mass of people together under terrorism laws will be tricky for them. Equally ignoring them and allowing them to flagrantly flout the law in public is equally undesirable for the state.

There are two different levels of risk.

- In a public place, wear an item of clothing or item that "would arouse reasonable suspicion that they are a member of a proscribed organisation". This means wearing a Palestine Action t-shirt or jumper. Read the legal risks. This can only be tried in the magistrates court and comes with a maximum sentence of 6 months in prison, and the likely outcome if prosecuted would be far less (e.g. fines or conditional discharge).
- Express your explicit support for Palestine Action. Read the legal risks. If this is tried in magistrates, the max sentences is the same as above. The risk here is if the case is moved to crown court the maximum jumps up to 14 years in prison.

Steps to take before you take action

- Print off and bring a bust card with you. See bust cards on GBC's website.
- Clear out tech (laptop, desktop, phone) from your home before taking action. This is to protect all of your friends and family as well as keeping your devices safe from the police
- Bring some money (cash) and a book in case you are arrested.
- Make sure someone is there to film what happens, and send it in to us.

Where and when are people taking action?

Every Saturday, people will be taking action to defy the ban. This will start on the 5th July 2025. On the morning of 5th July 2025, Defend our Juries, who had until this point legally campaigned against the courts crackdown on protest, defied the ban and held placards that read "I oppose genocide. I support Palestine Action". 27 people were arrested under s.13 Terrorism Act 200 which is summary only and will appear in the Magistrates' court, but so far have not been charged.

Keep up to date

Get updates on Telegram: https://t.me/we_do_not_comply

Email: breakunjustlaws@proton.me

More than 100 people arrested across UK in series of protests against Palestine Action ban

The direct action group has been designated as a proscribed terrorist organisation by the Home Secretary.

Saturday 19 July 2025 17:04, UK

Police arrest Palestine Action protesters. Pic: PA

Why you can trust Sky News >

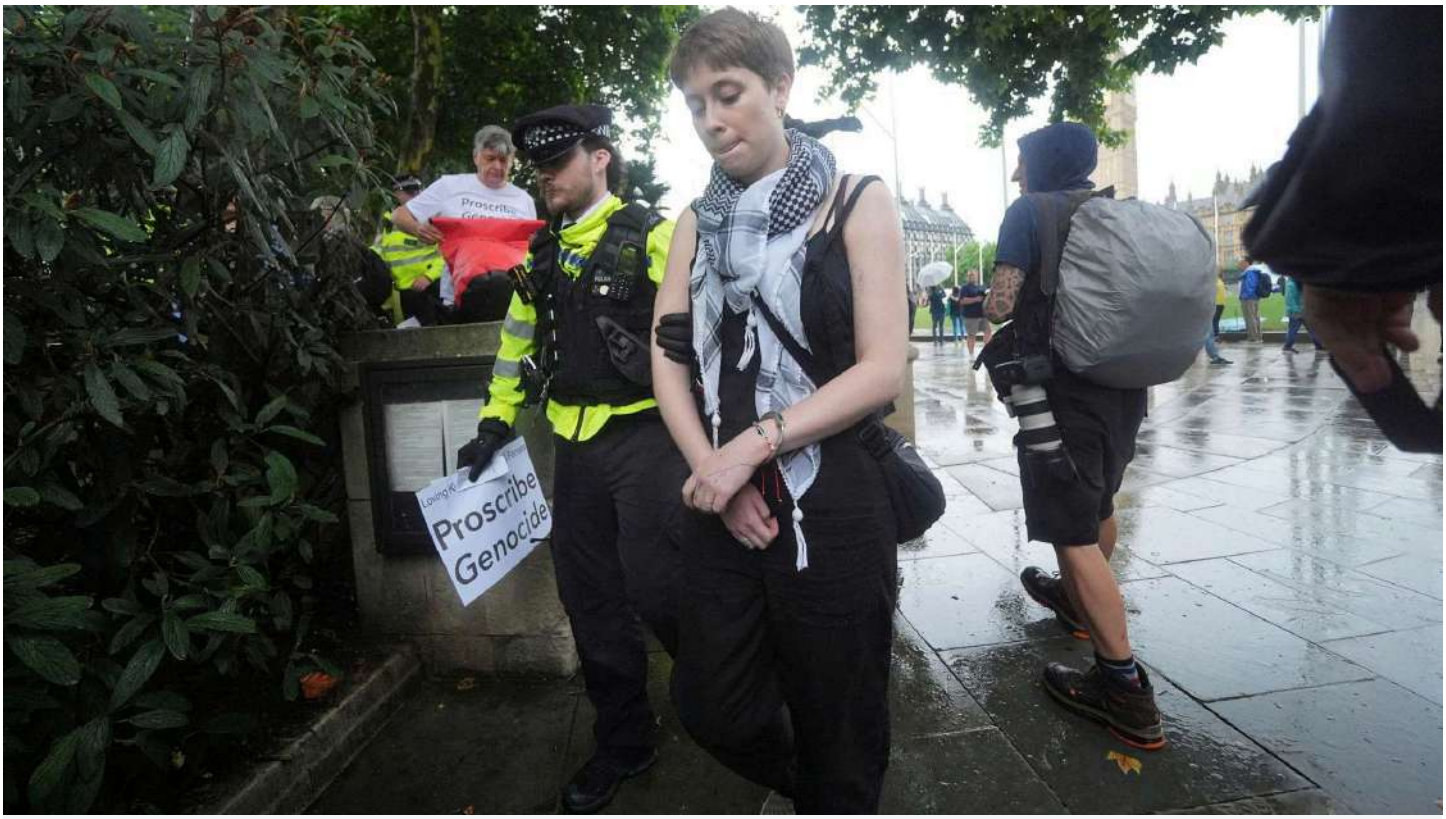
More than 100 people protesting against the ban of Palestine Action have been arrested in towns and cities across the UK.

As well as in London's Parliament Square, demonstrations were also held in Manchester, Edinburgh, Bristol and Truro after the group was officially designated as a **proscribed terrorist organisation** two weeks ago.

Protesters gathered in Parliament Square in Westminster carrying white placards with the message: "I oppose genocide, I support Palestine Action."

Some were carried away by officers, while others were led away in handcuffs.

A sign displayed in London during the protest



Palestine Action has been designated a terrorist organisation. Pic: PA

The **Metropolitan Police** said in a post on X: "55 people were arrested in Parliament Square for displaying placards in support of Palestine Action, which is a proscribed group."

The arrests were made under Section 13 of the Terrorism Act 2000, which carries a maximum six-month prison sentence.

The force said a further nine people were arrested for supporting Palestine Action within a separate large-scale march to Whitehall on Saturday by the Palestine Coalition.

Greater Manchester Police said it arrested 18 people on suspicion of support of a proscribed organisation, adding that they remained in custody for questioning.

Avon and Somerset Police said 17 people were arrested during a protest in Bristol, while eight people were arrested near Truro Cathedral in Cornwall after protesters gathered to show support for Palestine Action.

'FAST-MOVING' EVENTS DRAW A CROWD IN MANCHESTER

by Charlotte Leeming - North of England correspondent

In the pouring rain, a small group of protesters sat silently on stones in front of the Gandhi statue in Manchester city centre.

Within an hour of their arrival, each of them was arrested and taken away in police vans. Not for what they said or chanted, but because of the signs they held.

Handwritten placards with the words "I oppose genocide, I support Palestine Action" - now potentially an offence under the terrorism act.

16 people were swiftly arrested one after the other. Some had to be carried off, while others were led away in handcuffs.

The fast-moving events drew a crowd and were filmed by onlookers on their phones. At one point, a police woman asked people to stand back, so officers could do their jobs. One man shouted, "I wouldn't like it if that was my grandma being arrested."

But the protestors said they came prepared to spend a few hours in the cells. They looked unphased as the van doors were closed behind them.

With a large protest being planned for next month in London, activists say they're willing to break the law again for what they believe in, even if those actions could lead to 14 years in prison.

Seventy people were **arrested at similar demonstrations** in Parliament Square over the past two weekends.

Eight people were arrested near Truro Cathedral under Section 13, Devon and Cornwall Police said, while protesters have also been arrested at a demonstration in Manchester.

Before Saturday's protests, Defend Our Juries, which is coordinating the campaign, said a total of 120 people had previously been arrested across the UK.

A woman is led away by police in Manchester

The Met warned anyone expressing support for Palestine Action would likely face arrest and that officers would be on the lookout for chants similar to **"death to the IDF"** led by punk rap duo **Bob Vylan** at **Glastonbury** Festival.

Home Secretary Yvette Cooper announced plans to proscribe Palestine Action after two Voyager aircraft were allegedly damaged at RAF Brize

Norton in Oxfordshire on 20 June, which police said caused around £7m worth of damage.

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The ban means that membership of, or support for, the direct action group is now a criminal offence punishable by up to 14 years in prison, under the Terrorism Act 2000.

Even wearing a T-shirt or badge with the group's name on attracts a maximum six-month sentence.

Huda Ammori, the co-founder of Palestine Action, is seeking to challenge the ban, with a hearing for permission to bring a judicial review set to take place at the High Court on Monday.

Related Topics

Metropolitan Police | Protest

defendourjuries and **4 others**
Original audio

defendourjuries "We want Yvette Cooper to remove the proscription of Palestine Action"

A retired software engineer was just arrested under the Terrorism Act, alongside seven others in Truro, for holding a sign in opposition to genocide and in support of Palestine Action.

Join the 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.

Link to sign up for action is in our Instagram bio.

Edited · 1d

ron__the__person Imagine being arrested for speaking out against a genocide!

1d 1,294 likes Reply

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kenttisher The police exist to protect the interests of the rich.

1d 560 likes Reply

View replies (19)

greenneighbour Well said, sir. I have the utmost respect for your courage and commitment to freedom, democracy, and decency. Thank you.

1d 27 likes Reply

officialannielennox Such an elegant - articulate - compassionate man, with a strong sense of moral compass and

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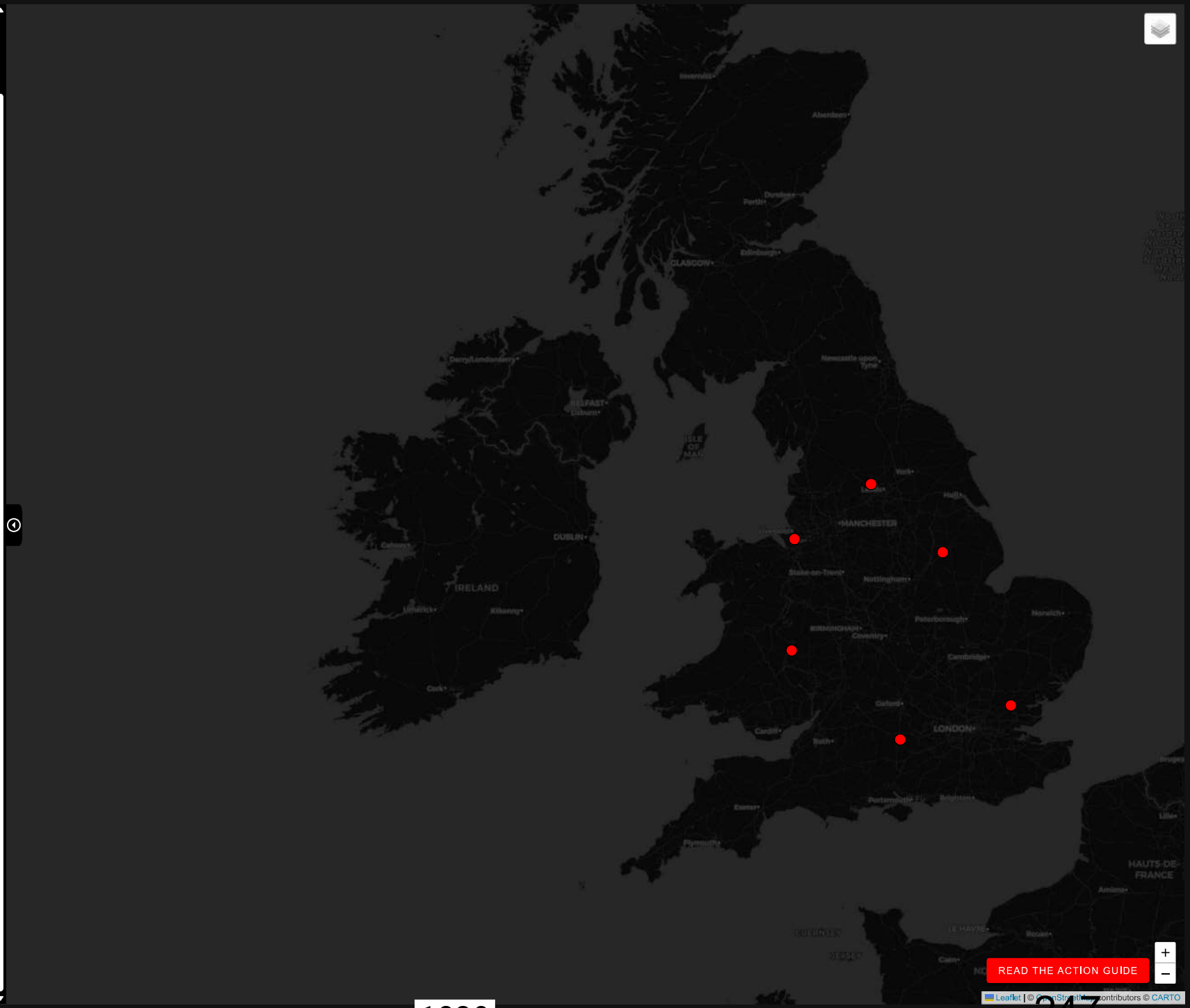

Teledyne UK - attacks and demonstrations 2022 - 2024

Date	Location	Duration	Group	Approx numbers	Police attendance	Tactics seen	Remarks	Subsequent Action
09-Dec-22	**Labtech Presteigne**	**5-6 hours**	**Palestine Action**	**4**	**Yes. Large police response.**	**Accessed reception. Sledgehammers used to break glass and destroy IT equipment. Ladders used to scale roof. Damage to roof and production area.**	**Police at heights team and Fire Service removed and arrested protesters from roof.**	**4 protestors held in prison on remand pending trial. Trial held 9-12 May 2023. [redacted] changed plea to guilty. Sentenced to 23 months imprisonment. [redacted] found guilty. Sentenced to 27 months imprisonment.**
28-Sep-23	**Te2v Chelmsford**	**Minutes**	**Palestine Action**	**1**	**No.**	**Red paint splashed across front wall.**	**Photographer present.**	**Police did not respond - led to subsequent calls with an Essex Detective Chief Inspector. Photo of TDY employee on national press website: taken down on request.**
23-Nov-23	TDS Shipley	1-2hrs	Bradford Friends of Palestine	10	Yes immediate 4 Officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
07-Dec-23	TDS Shipley	1-2hrs	Bradford Friends of Palestine	30	Yes immediate +6 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
19-Dec-23	TDS Shipley	1-2hrs	Bradford Friends of Palestine	120	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
26-Dec-23	**TDS Shipley**	**Minutes**	**Unknown**	**2**	**Yes immediate approx 10 officers**		**Arson attack. No injuries. Minor damage to goods inward area.**	**Suspect arrested September 2024. Thought to be a local, not part of a group. The CPS decided not to charge: evidence not strong enough.**
04-Jan-24	TDS Shipley	1-2hrs	Bradford Friends of Palestine	120	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
18-Jan-24	TDS Shipley	1-2 hrs	Bradford Friends of Palestine	45	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
25-Jan-24	TDS Shipley	1-2hrs	Bradford Friends of Palestine	40	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
08-Feb-24	TDS Shipley	1-2hrs	Bradford Friends of Palestine	15	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
14-Feb-24	TDS Shipley	1-2hrs	Bradford Friends of Palestine	60	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
16-Feb-24	CML Bromborough	1-2 hrs	Palestine Action Liverpool	10	Yes - 1 vehicle 2 Officers	Blocking entrances but allowing employee access trying to hand out leaflets	Not believed to be linked to Palestine Action Group. peaceful banners and posters and handing out leaflets	
29-Feb-24	TDS Shipley	1-2hrs	Bradford Friends of Palestine	20	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	

Teledyne UK - attacks and demonstrations 2022 - 2024								
Date	**Location**	**Duration**	**Group**	**Approx numbers**	**Police attendance**	**Tactics seen**	**Remarks**	**Subsequent Action**
06-Mar-24	CML Bromborough	1-2hrs	Palestine Action Liverpool	20	Yes immediate 1 vehicle 6 Officers	Blocking entrances trying to hand out leaflets. Possible that as all police/security resource arrives they disperse, thus costing Police and site extra cost.	Peaceful, blocking entrance gates, displaying banners handing out leaflets	
06-Mar-24	Labtech Presteigne	1-2 hrs	Radnor Palestine Links	25	No.	Blocking vehicle gate and handing in a letter	Peaceful. Handing over a letter demanding to speak to management. Subsequent piece in press. Two individuals with known links to PAG and previous protests/damage etc	
15-Mar-24	CML Bromborough	1-2hrs	Palestine Action Liverpool	20	Yes immediate approx 8 officers	Blocking entrances, handing out leaflets	Peaceful, blocking entrance gates, displaying banners handing out leaflets	
18-Mar-24	CML Bromborough	1.5 hrs	Palestine Action Liverpool	20	1 police officer	Blocking entrances but allowing employee entry	As previous. Banners leaflets standing at entrance points	
20-Mar-24	TDS Shipley		Bradford Friends of Palestine	60	5 Police, 2 vehicles in attendance prior to protest	Stood in front of vehicle gates but allowed access	Peaceful displaying banners (pro Palestine/anti Teledyne) 1 protester taking a lot of footage of the site buildings and perimeter. Assessed to be hostile recon. Speaker units and microphone in use (unknown what was said) 2 protesters praying at gate during protests (not seen before). Unite union flags in attendance.	
23-Mar-24	CML Bromborough	45mins	Palestine Action Liverpool	60	1 police vehicle 2 officers	Blocking entrances but allowing employee entry	As previous. Banners leaflets standing at entrance points. No employees required access/exit	
27-Mar-24	Labtech Presteigne	2hrs	Radnor Palestine Links	18	No police	Stood in front of vehicle gates, handed letter to site	Banners, leaflets etc	
02-Apr-24	**TDS Shipley**	**Approx 16hrs**	**Palestine Action Liverpool**	**4 on roof + 20 outside**	**All emergency services in numbers**	**On roof, smashing roof tiles, brickwork, windows etc**	**Eventually arrested and removed. Significant damage to building. Costs estimated at c£700k**	**Daniel Jones & Najam Shah released from custody after 1 week. Ruby Hamill released from custody 2 May. Julian (aka Laila) Gao remained in custody until June. Trial 5-13 Sept 2024. Hung jury. Retrial set for 9 February 2026.**
04-Apr-24	Labtech Presteigne	10 mins	Local councillor and ex mayor	1	No police	Handed letter to site	Nothing further	
09-Apr-24	TDS Shipley	2hrs	Bradford friends of Palestine	20-25	6 Officers	Blocking entrances but allowing ingress egress	Banners, leaflets and speakers	
10-Apr-24	CML Bromborough	1hr	Palestine Action Liverpool	approx 8	No police	Stood in front of entrances but allowed access	Banners, leaflets, chanting	
17-Apr-24	CML Bromborough	1hr	Palestine Action Liverpool	10	No Police	Stood in front of gates allowing access	Banners, leaflets, chanting	
21-Apr-24	E2V Tech Lincoln	30mins	Unknown	3	No police	Damage caused to perimeter fence/gate	No entry onto site, damage repaired following day	
23-Apr-24	E2V Tech Lincoln	10mins	Unknown	1	No Police	1 individual seen early hours inspecting repaired fence and gate	Police informed, images captured	
24-Apr-24	TDS Shipley	2hrs	Bradford Friends of Palestine	30	8 officers	Slow march on approach road, standing in front of gates	Banners, chanting, hands covered in red paint	

Teledyne UK - attacks and demonstrations 2022 - 2024

Date	Location	Duration	Group	Approx numbers	Police attendance	Tactics seen	Remarks	Subsequent Action
11-May-24	**Cumbernauld**	**15mins**	**Unknown**	**4**	**No response requested**	**4 individuals smashing windows and spraying paint. Did not enter building**	**Red paint, sledgehammers. Not assessed to be PA**	
12-May-24	Cumbernauld	20 mins	Unknown	1	Reported to Police	1 person taking photos of damaged windows	Reported to Police, they are investigating. Teledyne security investigation found that the individual was an employee but had failed to notify the control room of their visit out of hours. Employee educated and Police informed	
13-May-24	Cumbernauld	5-10 mins	Unknown	2	Reported to Police and response initiated	2 individuals walking along two aspects of the building	Police responded. No feedback from them due to investigation.	
15-May-24	**TDS Shipley**	**7 hrs**	**Palestine Action group**	**4 (3 female, 1 Male)**	**Large emergency services response**	**4 individuals gained access to reception roof and smashed roof and windows. Access to site was via a ladder against the fence. CCTV alarms activated and response called.**	**Police at heights team and fire service removed and arrested protesters from roof. Supporting demonstrators were held by Police at entrance to the industrial estate to prevent support to roof top protesters**	**Ricky Southall, Amareen Afzal, Serena Fenton released on police bail [redacted] in custody (has also attacked Barclays bank)**
07-Jun-24	CML Bromborough	10mins	Unknown	1 male	Nil	1 individual cut through fence and walked through site	Police informed, images captured	
21-Jun-24	CML Bromborough	1.5hrs	Palestine Action Liverpool	15	Large police presence	Stood in front of gates allowing access	Banners, leaflets, chanting	
21-Jun-24	CML Bromborough	10 mins	Unknown	1 male	Nil	Appears to have cut through fence and walked off site	Police informed, images captured	
05-Jul-24	**CML Bromborough**	**4 hrs**	**Palestine Action Liverpool**	**3 females**	**Large Police presence**	**3 individuals attempted to scale ladder to roof. After failing this, they rammed the vehicle gates with a van and proceeded to spray paint over the building whilst live streaming**	**Police arrested 3 protestors. All 3 released on bail. We await court dates**	
07-Aug-14	TDS Shipley	2 hrs	Bradford Friends of Palestine	Approx 20	Large Police presence	Standing in front of gates, chanting and singing	Banners, speakers etc	
18-Sep-24	**TDS Shipley**	**2 hrs**	**Bradford Friends of Palestine**	**Approx 30**	**Large Police presence**	**Standing in front of gates, chanting and singing**	**Banners, speakers etc. One individual carried a mask of [redacted]**	**Mask-wearer arrested, charged with a public order offence and bailed. Plea hearing 18 October 2024.**

Teledyne UK - attacks and demonstrations 2022 - 2024

Date	Location	Duration	Group	Approx numbers	Police attendance	Tactics seen	Remarks	Subsequent Action
23-Sep-24	**TDS Shipley**	**Approx. 10 minutes**	**Individual - Palestine Action links**	**1 female**	**Not at the time**	**Adjoining property Myers building yard report a person driving into their yard and park alongside the shared fence to the TDY site. Myers CCTV review shows the driver arrive at main gate at 16:50 and drive into the yard looking around, they reverse and leave. The car returns at 16:53 and asks Myers staff if they can reverse around. Instead of reversing the car drives forwards and stops facing the TDY site. Individual uses a camera phone to film site. They then film Myers yard and then drive slowly to the far end of the yard. 16:55 The driver stops alongside the Teledyne shared fence and films the TDY site from 10ft away, then drives away at 1656.**	**Red Fiesta YB63KCC, one female occupant. Reported on 101 as hostile reconnaissance against section 4 National Security Act. Crime ref 13240522712 / WYP-20240924-0741.**	**We understand from West Yorks police that the individual was arrested with four burner phones, incriminating hostile recon evidence of other locations on her phones and laptop but the phone seen on 23rd was not located. Individual is a regular at protests at the Shipley site with links to Palestine Action. The Police believe she passed the Teledyne recon phone onto Palestine Action before arrest. She gave no comment interview, then released on bail. Update from 28th Dec - CID and CPS are still deciding on next steps.**
02-Oct-24	**CML Bromborough**	**5hrs**	**Palestine Action Liverpool**	**2 males 2 females (1 male, driving the van, left immediately on electric scooter).**	**Large Police response**	**Climbed onto roof via ladder sealed in van, smashed roof and damaged production floor and clean room**	**Police arrested 3 individuals. We await court dates.**	**3 protestors released on police bail.**
30-Oct-24	TDS Shipley	5 hrs approx	Bradford Friends of Palestine	Approx 35	Immediate Police response	Standing in front of gates, chanting and singing	Originally planned for 12pm arrived at 0630hrs, banners, speakers etc	
20-Nov-24	**TDS Shipley**	**2hrs**	**Bradford Friends of Palestine**	**Approx 12**	**Police on scene**	**Standing in front of gates, chanting, singing and dancing**	**Police on scene preventing photography**	
28-Nov-24	TDS Shipley	3 hrs	Bradford Friends of Palestine	Approx 20	Police on scene prior	Initially in front of gates, Police eventually moved them across the road to allow employee access	Police on scene throughout, prevented photography	
08-Dec-24	e2v Chelmsford	N/A	Chelmsford Palestine Solidarity Campaign	n/a	Nil	Social media posted for a protest outside 1130-1330hrs 8 Dec 24. A further post was made postponing the event until 22 Dec 24	No protest took place, due to adverse weather	
19-Dec-24	**TDS Shipley**	**3 hrs approx**	**Bradford Friends of Palestine**	**Approx 17**	**Police attended both protest and subsequent lock-on attempt**	**Poster published on Bradford Friends of Palestine's Instagram account calling for a protest from 12 noon. Initial peaceful protest at top of Acorn Road. Protestors with posters and flags standing on the kerb of the pavement. Subsequent "lock-on" attempt by an individual who drove car in front of main gate.**	**Police attended site early in the morning in anticipation of an early morning blockade. None materialised. The protestors assembled at 1205 on both sides of the junction onto Acorn Park. Police in attendance. They finished at 1340 and dispersed. The police also departed. At 1437 an individual drove his car onto Teledyne property. He stopped in front of the main gate, unfurled a Palestine flag and shouted pro-Palestine slogans and insults towards Teledyne's staff. He then used a steel chain to lock himself to the steering wheel. Police arrived, removed the individual from the car and arrested him.**	**The vehicle was searched by the police who seized 2 x zombie-style knives, a brand new sledgehammer, a box of flares, small hammer, red paint and overnight bag of belongings. W York police subsequently informed us that the individual (Luke Carter) has been bailed. He had no previous arrests and no national intelligence recorded. Bail conditions not to approach / enter any Teledyne site across the UK.**

Teledyne UK - attacks and demonstrations 2022 - 2024

Date	Location	Duration	Group	Approx numbers	Police attendance	Tactics seen	Remarks	Subsequent Action
22-Dec-24	e2v Chelmsford		Chelmsford Palestine Solidarity Campaign	25+	Not known	No protest at Teledyne site. Protest instead held on Parkway, some distance from the site.		
28-Jan-25	**TDS Shipley**	**7-8 hours**	**Palestine Action**	**3 or 4**	**Immediate police response**	**Van rammed into bollards in front of main gate. Driver left. 2 protestors carried out a "lock-on" protest having affixed themselves to the van via a chain running through a pipe concreted into the van.**	**Police attended site with specialist removal team. 2 protestors freed from the van by 1230 and arrested. Limited site disruption.**	**Both protestors arrested and subsequently bailed.**
05-Feb-25	TDS Shipley	1hr	Bradford friends of Palestine	Approx 20	approx 10 officers	12pm, roadside protest at top of industrial park, followed by a 10 minute chant opposite side of road to vehicle gates before moving back to top of the park	Flags, banners and chanting.	
18-Feb-25	**TDS Shipley**	**Minutes**	**Not known**	**03-Jan**	**Police called after the event**	**Time 0144. Person(s) threw red paint against rear wall of building.**	**No damage apart from paint stains.**	**No arrests made.**
12-Mar-25	TDS Shipley	1hr	Bradford Friends of Palestine	13	Police on scene, prior, during and after protest	approx 0800, protesters at top of estate and then on road opposite main gates before dispersing.	No damage just chanting and placard holding.	
03-Apr-25	TDS Shipley	2hrs	Bradford Friends of Palestine	Approx 12	Police on scene prior, during and after the demonstration	1200 - roadside demonstration at top of the estate. Approx 1310, demonstrators arrived at gates and were held on opposite side of road by police. Demonstrators returned to top of park at approx 1325hrs	No damage, chanting and singing.	No arrests of protesters. However a member of the public (van driver) was arrested for hitting a protester with his van (nudging into him) and then assaulting the demonstrator. This was away from site and the driver was not part of Teledyne.
12-Apr-25	TDS Shipley	2hrs (at site) around 5 hrs in total including march from town centre	Bradford Friends of Palestine with, we believe, Leeds PSC/Bradford PSC/Dewsbury PSC/Youtube auditors	Approx 300	Police on scene throughout and post event	Protest arrived at site approx 1445. There were a number of speeches, chanting and banner waving but remained peaceful throughout. We understand that reference to the injunction was made by organisers, warning individuals not to breach.	No damage.	No arrests although the police were asked if they would take action under National Security legislation against two YouTube auditors taking photographs. We were told that the photography was not detrimental to national security. Team on site did point out that Palestine Action use such footage for hostile reconnaissance. We understand that two arrests have been made subsequently. Teledyne employees have provided statements to the police.
18-Apr-25	TDS Shipley	1hr 20 mins	Pray for peace	Approx 11	Police on scene throughout	Arrived at 1440hrs and stood adjacent to the vehicle gate. Incident passed peacefully and they left site at 1558hrs	No damage	Peaceful and no police intervention required.
17-Jun-25	e2v Chelmsford	2hrs	Various groups	Approx 12	Police on scene	Arrived from 0645hrs, stretched along opposite pathway and conducted peaceful, silent protest, dispersed around 0900hrs	No damage or abuse	Peaceful and no police intervention required.

Teledyne UK - attacks and demonstrations 2022 - 2024								
Date	**Location**	**Duration**	**Group**	**Approx numbers**	**Police attendance**	**Tactics seen**	**Remarks**	**Subsequent Action**
02-Jul-25	Shipley	25mins	Bradford friends of Palestine	Approx 30	Police on scene in numbers	Demonstrators arrived approx 1315hrs and left approx 20 minutes later	No damage or abuse	Peaceful with no Police intervention. Youtube auditors at site but did not take any footage of site. One photographer (possibly press) warned by police to not take photos
03-Jul-25	Shipley	Approx 1 hr	Unknown	4	Police in attendance	4 females arrived and quietly demonstrated	No damage or abuse	Peaceful and the demonstrators left at 0833hrs. They claim they will come every week until 'Teledyne is shut down'
08-Jul-25	Shipley	Approx 1 hr	Unknown	4	Police in attendance	4 females arrived and quietly demonstrated	No damage or abuse	Peaceful and the demonstrators left after about an hour approx 0730-0830hrs. Same individuals as 3 Jul 25

Certificate of service

Name of court	Claim No.
High Court of Justice Kings Bench Division	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? 18/07/2025

The date of service is 18/07/2025

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

Hearing Bundle

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 1 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 1.....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 1 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 Emails 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: 18/07/2025

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Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules (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)

Method of service	Deemed day of service
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. media@palestinecampaign.org - Email sent at:10:43
2. info@palestineaction.org - Email sent at:10:44
3. info@palestinecampaign.org - Email sent at:10:44
4. pscchelmsford@gmail.com - Email sent at: 10:44
5. pscshrop@gmail.com - Email sent at:10:44
6. lincolnpalestine@gmail.com - Email sent at:10:49
7. liverpoolfopal@gmail.com - Email sent at:10:49
8. palestinesolidaritybradford@gmail.com - Email sent at:10:49
9. branches@palestinecampaign.org - Email sent at:10:49
10. actions@palestineaction.org - Email sent at:10:49
11. bfdfriendsofpalestine@yahoo.com - Email sent at:10:50

Certificate of service

Name of court	Claim No.
High Court of Justice Kings Bench Division	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	

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The date of service is 18/07/2025

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

Hearing Bundle

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)

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- ☐ 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)*
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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
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- ☐ 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: 18/07/2025

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