

OPUS2

MBR Acres Limited & Others v Free the MBR Beagles & Others

Day 6

May 3, 2023

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Phone: 020 4518 8448

Email: transcripts@opus2.com

Website: <https://www.opus2.com>

Wednesday, 3 May 2023

(10.29 am)

MR JUSTICE NICKLIN: Yes, Ms Bolton.

MS BOLTON: My Lord, I think Mr Curtin has a couple of housekeeping matters he wants to raise.

MR JUSTICE NICKLIN: Okay. Yes, Mr Curtin.

MR CURTIN: My suggestion is that we do this after the witness perhaps and see how we get on. It's to call -- in my witness statement, there's a number of witnesses that I've called for that are not there. I've spoke to counsel for MBR and she's telling me something about hearsay and that ... I need to speak to you about a number of witnesses that I've called that are not going to be here. Do you want to do that now?

MR JUSTICE NICKLIN: No, we'll do it after the witness.

MR CURTIN: Excellent.

MR JUSTICE NICKLIN: Okay. Right.

MS BOLTON: My Lord, we're calling our next witness, Demetris Markou. I don't know if we're ready yet.

MR JUSTICE NICKLIN: Are you there? (Pause)

There we are.

THE WITNESS: Yes.

MR JUSTICE NICKLIN: We need a full screen really. I don't know what's happening with that. It's not your end, Mr Markou.

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Okay, who is in charge of the screen?

MS BOLTON: I believe it's Opus.

THE EPE OPERATOR: The court.

MR JUSTICE NICKLIN: What's the problem with the --

THE CLERK OF THE COURT: It's fine.

MR JUSTICE NICKLIN: Good.

MR DEMETRIS MARKOU (sworn)

Examination--in--chief by MS BOLTON

MS BOLTON: Mr Markou, good morning. You should have a bundle in front of you and I'm going to ask you to turn to page 1047. My Lord, that's in the persons unknown bundle. It starts at page 441 for Mr Curtin's bundle. That should be the first witness statement of Demetris Markou. Do you have that document?

A. Yes.

Q. If I could ask you to turn through that document to page 1069 --

A. Yes.

Q. -- is that your signature?

A. Yes.

Q. And also, if I could ask you to look at pages 1072 to 1084, is that --

A. Sorry?

Q. 1072 to 1084, is that the exhibit to your witness statement?

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A. Yes.

Q. Is that witness statement still true to the best of your knowledge and belief?

A. Yes.

MS BOLTON: Mr Markou, thank you very much. If you could wait there, there may be some further questions for you.

Cross--examination by MR CURTIN

MR CURTIN: Good morning. Please bear with me. I'm not a trained lawyer so if there's any questions you don't understand, then please make it clear. If my question is not clear enough, then remind me, please. Yes?

So you took over from Jane Read -- is that correct? -- as the person responsible for representing MBR in this entire court case; yes?

A. Sorry, which paragraph of my statement are you referring to?

Q. Pardon?

A. Which paragraph of my statement are you referring to?

MR JUSTICE NICKLIN: Mr Curtin isn't referring you to any part of your witness statement yet. He's just asking you some general questions, so if you just listen to the question and answer as best you can.

MR CURTIN: Paragraph 1, the first sentence.

A. Yes.

Q. "I am the Second Claimant representative, having taken

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over the role from Jane Read in [October] 2021."

A. Yes.

Q. Now, please, if you can accept from me, in Jane Read's submission, she explained that the reason that she had been chosen to be representative of this company was based on her seniority and her experience; yes?

A. Yes.

Q. Why were you chosen for this role, do you know?

A. As explained in my statement, Jane Read had an absence due to sickness so I took on that role.

Q. My question was: why you? Okay, you describe yourself as a line manager -- you are a line manager; is that correct?

A. Yes.

Q. Are there other line managers -- are you the line manager or are you one of a number of line managers?

A. I'm one of a number of line managers.

Q. Okay. So, again, I ask you why -- how long have you worked for MBR?

A. I'm one of the senior staff members on site.

Q. How long have you worked at MBR?

A. As explained in my statement, since 2018.

Q. Since 2018. So not long really; a few years?

A. Since 2018.

Q. Were you employed in the breeding of animals for

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1 vivisection prior to this? Were you employed in
 2 a similar business prior to 2018?
 3 MS BOLTON: My Lord, sorry, I think that the witness can't
 4 hear very well. I think he needs the volume turning up.
 5 I think there is a solicitor in the room who might be
 6 able to do that, but obviously it needs a direction from
 7 you, my Lord.
 8 MR JUSTICE NICKLIN: Okay. If you can try and sort that out
 9 in the remote location, please.
 10 MR CURTIN: Also I'm --
 11 MR JUSTICE NICKLIN: Wait a minute.
 12 MR CURTIN: I beg your pardon.
 13 THE SOLICITOR: Sorry, we're actually at the maximum volume
 14 already.
 15 MR JUSTICE NICKLIN: Are you having difficulty hearing?
 16 A. I can hear you perfectly but I cannot hear Mr Curtin.
 17 I believe he needs to go closer to --
 18 MR JUSTICE NICKLIN: Now we can't hear him.
 19 A. Can you hear me? (Pause)
 20 MR JUSTICE NICKLIN: Mr Markou, can you hear me?
 21 A. I can hear you fine, yes.
 22 MR CURTIN: Can you hear me? I'm Mr Curtin.
 23 A. It sounds like your voice comes from the room but not
 24 from the microphone.
 25 MR JUSTICE NICKLIN: Okay. Which of these is the live

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1 microphone that's transmitting? Is it this one?
 2 (Indicates)
 3 MR CURTIN: Is that better?
 4 A. Yes.
 5 Q. Okay, good. So were you employed in the breeding of
 6 animals for vivisection prior to 2018?
 7 A. Yes.
 8 Q. You were. What was the nature of that? I'm just trying
 9 to gather if you are a suitable person, as far as I'm
 10 concerned, to represent MBR. So you had -- where was
 11 your previous experience of breeding animals for
 12 vivisection, please?
 13 A. It was at Envigo.
 14 Q. Pardon?
 15 A. At Envigo.
 16 Q. At Envigo. In the UK?
 17 A. Yes.
 18 Q. How much experience did you have at Envigo, meant in
 19 years?
 20 A. I was -- more than a year.
 21 Q. I still don't understand why you're here today giving
 22 evidence on behalf of this company as a general
 23 spokesperson. You've worked there for a number of years
 24 as one of the line managers. What are your
 25 qualifications to speak on behalf of this company?

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1 Did you -- okay. Did you ask to be in this position or
 2 were you appointed?
 3 MS BOLTON: With respect, Mr Curtin is wrong to be putting
 4 that to the witness. He is not speaking on behalf of
 5 the MBR. He is speaking on behalf of the second
 6 claimant class, which is the staff and the contractors
 7 who work for MBR, of which he is a member. So it keeps
 8 being put to him why is he representing this company.
 9 He's not representing the company. He's representing
 10 the second claimant class, of which he is a member.
 11 MR JUSTICE NICKLIN: Well, who constituted that class?
 12 MS BOLTON: Well, my Lord, the point is that that should be
 13 somebody from that group --
 14 MR JUSTICE NICKLIN: I see that. I don't suppose --
 15 MS BOLTON: -- and so what he said to him is why is he
 16 speaking on behalf of MBR. He's not. He's speaking on
 17 behalf of the second claimant class.
 18 MR JUSTICE NICKLIN: But who appointed him to that role?
 19 MS BOLTON: Well, that may very well be MBR, my Lord, but
 20 that's not who he is speaking on behalf of.
 21 MR JUSTICE NICKLIN: Right.
 22 MS BOLTON: What he's being asked is, "Well, who gave you
 23 the authority to speak on behalf of MBR?". Well, that
 24 was Ms Pressick. This is to do with the impact on staff
 25 and he represents that class.

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1 MR JUSTICE NICKLIN: Right.
 2 MS BOLTON: I just make that point because it keeps being
 3 put to the witness and it's not a fair question because
 4 the witness isn't going to understand it because that's
 5 not what he's doing. He's replaced Jane Read, he's
 6 explained why, and again Jane Read is a member of staff.
 7 That's why he's in this position. So I just make the
 8 point --
 9 MR JUSTICE NICKLIN: Mr Curtin, you understand what the
 10 point is?
 11 MR CURTIN: Yes.
 12 MR JUSTICE NICKLIN: He's not technically representing MBR,
 13 although I think it's recognised that he's likely to
 14 have been appointed to the role he occupies by MBR, but
 15 he's strictly representing the class that are identified
 16 in the second claimant. So, I mean, you can pursue the
 17 questions in relation to how he got that role if you
 18 want.
 19 MR CURTIN: Briefly and then I'll move on. Were you
 20 appointed -- were you asked by a member of Marshall Farm
 21 Group Limited, by Bantin & Kingman -- were you asked by
 22 somebody to adopt this role as ...?
 23 A. Which role?
 24 Q. The one you're in now, speaking on behalf of the second
 25 claimant. Why is it you? I want to know why it's you

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1 that's here to represent the second claimant.
 2 A. I was asked if I wanted to take on that role and
 3 I accepted.
 4 Q. And did another employee of MBR Acres or did an employee
 5 from another company ask you or did a solicitor ask you?
 6 Who asked you?
 7 A. My company asked me.
 8 Q. A company can't ask you. It must be a human being.
 9 A. (Inaudible — overspeaking). My employer asked me.
 10 MR JUSTICE NICKLIN: You can't talk over each other; right?
 11 MR CURTIN: I'm sorry.
 12 MR JUSTICE NICKLIN: Right. Mr Markou, please could you
 13 answer the question, which is: who appointed you?
 14 A. My employer appointed me for this role.
 15 MR CURTIN: Mr Markou, you seem to be acting vague. Can you
 16 give a name of a human being? At any point did a single
 17 human being — think about it. It's a simple question.
 18 You've told the court you were requested to take part in
 19 this role. Which human being asked you to become the
 20 man sitting there today to talk on behalf of the second
 21 claimant? It's a simple question.
 22 A. Sue Pressick.
 23 Q. Sue Pressick. So you've worked there since 2018. So
 24 you were working there at the beginning of Camp Beagle
 25 in the summer, early summer, of 2021; correct?

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1 A. Yes.
 2 Q. And you continue to work there to this day?
 3 A. Yes.
 4 Q. So that means — do you attend work on a sort of Monday
 5 to Friday type basis?
 6 A. Yes.
 7 Q. So you drive past Camp Beagle regularly and a number of
 8 times a week — four to five times every week, you drive
 9 in and out of the gates; would that be correct?
 10 A. Yes.
 11 Q. And in that time you've witnessed the protestors?
 12 A. Yes.
 13 Q. And in relation to you, your experience, have you been
 14 shouted at many times?
 15 A. Yes.
 16 Q. What do you remember being — give me some examples of
 17 what people have shouted at you.
 18 A. From my statement? From my witness statement?
 19 MR JUSTICE NICKLIN: Mr Curtin is just asking you general
 20 questions now, so from your memory what can you remember
 21 protestors shouting at you?
 22 A. "Bastard", "Scum", things like — quite some really bad
 23 insults which I don't think it's the place to state
 24 those insults, but really bad insults.
 25 MR JUSTICE NICKLIN: You don't need to be in any way

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1 restrained, Mr Markou. It's important that you tell me
 2 what you remember. Don't worry. I sit in the
 3 Criminal Court. I hear lots of things.
 4 A. Things like "Motherfucker", "Scumbag", "Scum".
 5 MR CURTIN: Okay. And how does that make you feel, to be
 6 called "Scum" and "Bastard", et cetera — when people
 7 use expletives, how does it feel?
 8 A. It's feels really bad, really insulting. It feels
 9 intimidating sometimes yes. There are some words I even
 10 had to Google their meaning because I didn't even know
 11 what they mean. I had to understand what they mean
 12 because I'm not used to this kind of wording being used,
 13 so I had to look up the vocabulary (inaudible) the
 14 insults sometimes. Like "scumbag", I had to look it up;
 15 like "scum", I had to look it up (inaudible).
 16 MR JUSTICE NICKLIN: Can I just enquire, is there something
 17 obstructing the microphone at the remote end?
 18 A. No.
 19 MR JUSTICE NICKLIN: Okay.
 20 MS BOLTON: I wonder if he's sitting a bit too close to it,
 21 my Lord. It could be that. It might be worth sitting
 22 back a little bit, Mr Markou, because we can't always
 23 hear you properly.
 24 A. Okay. Is that better?
 25 MR JUSTICE NICKLIN: No. There's something — if it's

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1 a directional microphone, it may be pointing in the
 2 wrong direction. There's something muffling the sound.
 3 MS BOLTON: My Lord, I think his sound test was being done
 4 when you came in. I'm wondering if that is still needed
 5 to be properly completed. I didn't realise until
 6 literally you were coming in that somebody was still
 7 checking. I'm not sure if it's been done fully and
 8 whether perhaps we should have five minutes because
 9 I couldn't hear a word of that last bit of the evidence
 10 from the witness.
 11 MR JUSTICE NICKLIN: Yes. I'm worried that the stenographer
 12 is going to have the same difficulties that we are.
 13 I'm going to rise just for a few moments, Mr Curtin,
 14 so we can try to sort out what the sound problem is
 15 because otherwise we're going to struggle to hear what
 16 Mr Markou is saying.
 17 (10.48 am)
 18 (A short break)
 19 (11.04 am)
 20 MS BOLTON: I think we're there, my Lord.
 21 MR JUSTICE NICKLIN: Okay. Right. Carry on, Mr Curtin.
 22 MR CURTIN: Before we were interrupted, we were talking
 23 about language use. Can I just take you to — can I ask
 24 you a wider point first about how you made this
 25 statement? Was this statement made entirely of your own

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1 words? Was this statement made of your own words?
 2 A. Those are my own -- those are my words in my statement.
 3 Q. Were you coached or guided by anyone to make this
 4 statement or was it entirely of your own wording?
 5 Were you guided? Were you helped or was it entirely
 6 your statement that you made on your own?
 7 A. This is my statement.
 8 Q. Can I draw your attention to paragraph 10, please, the
 9 first sentence?
 10 A. Yes.
 11 Q. "During the summer of 2021, the protests outside the
 12 Wyton Site became more intense, and entering or exiting
 13 the Wyton Site safely either in a convoy or not was not
 14 possible."
 15 A. Yes.
 16 Q. I beg your pardon, my Lord. Sincere apologies.
 17 MR JUSTICE NICKLIN: Well, if you want an example,
 18 Mr Curtin, paragraph 9 of the Production Manager's
 19 statement.
 20 MR CURTIN: Yes, my point is that exact -- go to the exact
 21 wording, thank you. I have written it down and I've
 22 made notes. I put it to you that this exact sentence
 23 appears in many, many of the witness statements.
 24 Would you be able to explain that? Were you guided to
 25 make this statement?

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1 A. I haven't seen --
 2 Q. I'm saying -- sorry, let me speak. I'm saying to you
 3 this exact sentence word for word appears in many other
 4 statements. Could you explain that to me, please?
 5 A. I haven't read any other statements so I cannot comment
 6 on that. I haven't read any other statements.
 7 Q. Do you think it peculiar that the same sentence in your
 8 statement appears in many, many other statements?
 9 Would you say that's a coincidence?
 10 A. That's says what happened. (Inaudible) the site, just
 11 exactly what happened.
 12 Q. I put it to you that you were in fact guided in the
 13 making of this statement and I want to know who guided
 14 you and how that guidance went along. It's impossible
 15 that the same people can use the same sentence.
 16 Would you agree with that? It's impossible.
 17 MS BOLTON: It's not the same sentence, with respect --
 18 MR JUSTICE NICKLIN: Well, it's very similar.
 19 MS BOLTON: -- and the witness explains how he's done his
 20 statement in paragraph 2. It's not the same sentence.
 21 MR CURTIN: There are many --
 22 MR JUSTICE NICKLIN: Right. Let's look at the example. In
 23 the bundle you have in front of you, Mr Markou, if you
 24 go over to -- I think hopefully it will be in the same
 25 structure. So if you look at tab 6 ...

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1 MR CURTIN: My Lord, paragraph 9.
 2 MR JUSTICE NICKLIN: I know. Do you have that? It's the
 3 witness statement of the Production Manager who gave
 4 evidence yesterday or the day before. Do you have that
 5 statement?
 6 A. Not yet.
 7 MR JUSTICE NICKLIN: All right. It's in the persons unknown
 8 bundle 3, tab 6.
 9 MS BOLTON: Page 1124.
 10 MR JUSTICE NICKLIN: Yes, I've got it. I'm just waiting for
 11 them to get the bundle open.
 12 A. Yes.
 13 MR JUSTICE NICKLIN: If you go to page 1124.
 14 A. Just a moment.
 15 MR JUSTICE NICKLIN: Are you on page 1124?
 16 A. Yes.
 17 MR JUSTICE NICKLIN: If you look at paragraph 9, the first
 18 sentence of that witness' evidence states:
 19 "During the summer of 2021, the protests outside the
 20 Wyton Site became more intense ..."
 21 If you look back to your paragraph 10 --
 22 A. Yes.
 23 MR JUSTICE NICKLIN: -- "During the summer of 2021, the
 24 protests outside the Wyton site became more intense ..."
 25 A. Yes.

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1 MR JUSTICE NICKLIN: It's unusual for witnesses that have
 2 written their own statements to use exactly the same
 3 words, so can you provide any explanation? Did you
 4 discuss your evidence with the Production Manager?
 5 A. No.
 6 MR JUSTICE NICKLIN: Can you explain the fact that those two
 7 sentences have the same words in them?
 8 A. I can't explain it --
 9 MR JUSTICE NICKLIN: I mean, Mr Markou, it's not unusual for
 10 legal advisers to assist witnesses in preparing their
 11 statements, so that wouldn't be at all unusual and
 12 I believe that's what's happened in your case. And
 13 sometimes a draft is provided and you look at it and
 14 say, "Yes, that's fine. That's my evidence".
 15 A. Yes.
 16 MR JUSTICE NICKLIN: Now, is that what happened in your
 17 case?
 18 A. Yes.
 19 MR JUSTICE NICKLIN: Right.
 20 MR CURTIN: So you were guided to make this statement?
 21 A. I discussed my statement with the legal team.
 22 Q. And was it just the legal team or were there other MBR
 23 or Marshall employees helping you to make this
 24 statement?
 25 A. Just the legal team.

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1 Q. Just the legal team, okay. Okay, let's move on.
 2 So let's go back to the -- I asked you how it felt
 3 to be called these names that you gave.
 4 A. Do you mean the insults?
 5 Q. Pardon?
 6 A. Do you mean the insults?
 7 Q. Yes. I mean the -- yeah, the "Scum" -- yes, those.
 8 A. It felt really degrading, intimidating, humiliating,
 9 sometimes threatening.
 10 Q. What about words such as "Puppy killer", "Murderer"?
 11 Would that be similar?
 12 A. Yes.
 13 Q. Are you a puppy killer?
 14 A. No. Can you clarify that, please? Can you clarify
 15 that?
 16 Q. Not really, no.
 17 A. What do you mean by "Puppy killer"?
 18 Q. In the course of your work, does it involve killing
 19 puppies?
 20 A. If we need to euthanise an animal, yes, we would
 21 euthanise the animal, but I don't classify myself as
 22 a puppy killer in that -- in the way that the site -- in
 23 the way the persons shout at us, I don't accept that
 24 term. But if we need to euthanise an animal, we will
 25 euthanise; the same way a vet at a practice would

1 euthanise an animal, you wouldn't call the vet a killer,
 2 or if somebody is on life support and their family
 3 decides -- they agree to remove the support, you
 4 wouldn't call the physician a killer, or like a soldier,
 5 if they fight in a country, you wouldn't call that
 6 soldier a killer.
 7 Q. Why do you put your job next to a veterinary surgeon or
 8 a doctor, people whose profession it is to care for
 9 animals? Your job, is it not, is to raise and sell
 10 animals to be experimented upon, isn't it?
 11 A. We work under Government regulations and we do care for
 12 animals.
 13 Q. Well, we'll talk about that. What about -- so you've
 14 euthanised animals. Why have you euthanised them? Why
 15 have you -- you -- why have you euthanised puppies?
 16 Think about it --
 17 A. If they are unwell -- if they are unwell, we need to
 18 euthanise them and if they are -- to prevent
 19 suffering -- pain, suffering, distress, we will
 20 euthanise them.
 21 Q. So do you frequently kill puppies?
 22 A. No.
 23 MR JUSTICE NICKLIN: Mr Curtin, we're starting to move off
 24 the area.
 25 MR CURTIN: We're starting to, only starting to.

1 MR JUSTICE NICKLIN: You can ask -- the question you need to
 2 ask, if you want to, is the point about terminal
 3 bleeding.
 4 MR CURTIN: Well, he may kill puppies routinely.
 5 MR JUSTICE NICKLIN: No, no, no, no.
 6 MS BOLTON: I think the term is "terminal anaesthesia", my
 7 Lord. That's the technical term.
 8 MR JUSTICE NICKLIN: Well, it's not the term that
 9 Ms Pressick used.
 10 MS BOLTON: I think that that was explained -- I think
 11 Ms Pressick wasn't the only witness that explained it,
 12 but it's -- "terminal anaesthesia" is the technical
 13 term, just from the point of view of -- it's not
 14 "terminal bleeding". It's to do with a procedure when
 15 they're under anaesthetic for an animal that is already
 16 unwell. I think we need to be clear on that because
 17 it's being put to the witnesses as "terminal bleeding"
 18 and it's actually "terminal anaesthesia" --
 19 MR JUSTICE NICKLIN: Right. Well, I'll need to look back at
 20 Ms Pressick's evidence.
 21 MS BOLTON: -- so they don't wake up from the anaesthetic.
 22 MR JUSTICE NICKLIN: I know that.
 23 MS BOLTON: That's the point.
 24 MR CURTIN: If I may be allowed -- I'm on the edge, but
 25 again my question --

1 MR JUSTICE NICKLIN: Mr Curtin, it's not a process of you
 2 challenging me every day to see how far you can get.
 3 MR CURTIN: No.
 4 MR JUSTICE NICKLIN: Okay? The rules are the same every
 5 day.
 6 MR CURTIN: Are you aware that this company that you're
 7 speaking on behalf of -- are you aware that it holds two
 8 project licences, one for breeding animals for
 9 experiments and another one for bleeding? Are you aware
 10 of the bleeding element?
 11 A. Yes.
 12 Q. And are you aware of part of that project licence, it
 13 involves a procedure called "terminal anaesthesia"?
 14 A. Yes.
 15 Q. As a result of carrying out the terminal anaesthesia,
 16 which, if I'm right, is to bleed the dogs of their last
 17 drop of blood, the dog in question dies as a result, is
 18 killed; is that correct?
 19 A. No, you are wrong. We don't bleed -- can you repeat the
 20 question, please, because you are -- it was wrong. Your
 21 question, it suggested that I answer "Yes" or "No" for
 22 a question that's long. Can you repeat that, please?
 23 Q. You are aware of the terminal bleeding, the terminal
 24 anaesthesia element of the bleeding process? Are you
 25 aware of this?

1 A. Yes.
 2 Q. As a result of that procedure, as a result of a puppy
 3 being subjected to the terminal anaesthesia, are they
 4 alive or dead at the end of that procedure?
 5 A. We do not submit puppies to terminal anaesthesia. You
 6 are wrong.
 7 Q. Who do you subject to terminal anaesthesia then?
 8 A. Not puppies.
 9 Q. Cats?
 10 A. Dogs, adult dogs.
 11 MR CURTIN: May I explore?
 12 MR JUSTICE NICKLIN: Do you need to go further than that?
 13 MR CURTIN: I wish to, yes.
 14 MR JUSTICE NICKLIN: What for?
 15 MR CURTIN: A dog killer -- I just want to --
 16 MR JUSTICE NICKLIN: This is -- it's back to the point which
 17 is you've demonstrated --
 18 MR CURTIN: I don't wish to annoy you.
 19 MR JUSTICE NICKLIN: Well, you can ask him, if you like,
 20 about -- you've asked previous witnesses about this,
 21 which is how -- does he appreciate how other people
 22 might construe that --
 23 MR CURTIN: Okay.
 24 MR JUSTICE NICKLIN: -- and why it is that protestors shout
 25 "Puppy killer" at the workers.

1 MR CURTIN: Okay. Let me build it up.
 2 One question. At what age does a puppy become
 3 a dog? Could you draw the distinction for me, please,
 4 as simply as you can? You don't kill puppies -- you do
 5 kill -- there are elements of -- puppies are killed on
 6 site because of euthanasia, but in the bleeding process,
 7 tell me your -- when I say, "Do you kill puppies?", you
 8 say, "No, I don't. I kill dogs". Could you tell me
 9 your understanding of the concept of "puppy" and "dog",
 10 please?
 11 A. A puppy is a dog.
 12 Q. When is a puppy -- when is a dog -- which way round
 13 is it? When is a puppy not a dog or when is a dog --
 14 when does a puppy become a dog?
 15 A. The puppy is considered a dog. It's not a different
 16 species. It's a dog.
 17 Q. Okay. I'll move on.
 18 MS BOLTON: You can ask --
 19 MR CURTIN: No, I think I'll move on.
 20 You previously worked for Envigo; yes?
 21 A. Yes.
 22 Q. Like MBR -- so that's two companies you've worked for,
 23 both of whom receive extensive coverage in the media; is
 24 that correct?
 25 A. I'm not aware of coverage in the media for this

1 company --
 2 Q. You're not aware? You're not aware of Envigo or MBR
 3 appearing in the media; is that your evidence?
 4 A. Do you mean at the moment?
 5 MR JUSTICE NICKLIN: No. In the time that you've worked for
 6 those companies, Mr Markou, are you aware that they have
 7 been the subject of media attention because of the work
 8 that they do?
 9 A. Yes.
 10 MR CURTIN: Yes. So let's put it this way: it's very
 11 controversial business, isn't it, animal experiments?
 12 A. I understand different people have their own views and
 13 I respect that.
 14 Q. Good. Yes, there are very strong emotions and views
 15 held here. That's correct, isn't it?
 16 A. As I said, people have their own views and it's -- you
 17 know, it's debatable subject.
 18 Q. Okay. As part of my witness bundle, I have a copy of
 19 the Daily Mirror from this year. It's a double-page
 20 spread and the headline is "Horrors of the Puppy
 21 Factory", then it goes into detail and there are
 22 photographs of dogs inside MBR. Would that be a typical
 23 example of MBR and Envigo appearing in the press?
 24 A. I'm waiting to see the article.
 25 Q. I'm just asking you to accept. You can see it if you

1 want. I can ask you to accept that there were some
 2 headlines about MBR where they called "The Horrors of
 3 the Puppy Factory"?
 4 A. Yes, there are articles like that.
 5 Q. Okay. So extremely high emotions, difference of
 6 opinion. So are you aware of the people's right to
 7 protest about vivisection?
 8 A. Yes.
 9 Q. And in the course of their protest, there will be
 10 shouting and people will choose words to shout that
 11 suits their feelings about this issue -- yes? -- and
 12 sometimes they may use very strong language, such as
 13 "Scum"?
 14 A. I would accept a peaceful protest. That's not
 15 considered a peaceful protest, in my opinion.
 16 Q. That's your opinion. But what about when people call
 17 you "Puppy killer" or how you perceive -- you believe
 18 that these people -- do you take everything that the
 19 protestors shout personally or do you see it as
 20 a generic -- as an across-the-board criticism of all MBR
 21 workers? Have you taken -- when you hear the shouts of
 22 "Scum" or "Puppy killer", do you take it personally or
 23 do you understand that this is projected at any worker
 24 inside MBR?
 25 A. If it's addressed to me directly, then yes. If it's

1 addressed to me -- if it is addressed to me, as I'm
 2 moving between buildings or as I drive through the
 3 protestors, if it's addressed to me, then, yes, it is
 4 addressed to me.
 5 Q. But I put it to you there's a different scenario. You
 6 can take it like that if you want, but what about this
 7 scenario: nearly every car that drives in and out of MBR
 8 gets -- they end up getting shouted at; "Scum", "Puppy
 9 killer", "Murderer". Isn't it the case that every car
 10 gets shouted at? Would you agree with that?
 11 A. Not every car is shouted at.
 12 Q. Which ones are not shouted at?
 13 A. There are occasions they are not shouted at, from what
 14 I remember and from some videos.
 15 Q. I'd say -- is there evidence in your statement that I've
 16 shouted anything at you?
 17 MS BOLTON: I'm sorry, that's got to be put to the witness.
 18 If there is somewhere, then it needs to be challenged.
 19 It's not for the witness to go through their witness
 20 statement now and pick out the evidence for Mr Curtin.
 21 It keeps being put to the witnesses in this way and
 22 that's not fair.
 23 MR CURTIN: Okay.
 24 Is it your case that I have singled you out and
 25 called you names in particular? You, Demetris Markou,

1 that I, John Curtin, have -- is it your case that I want
 2 to single you out and cause you some alarm, harassment
 3 or distress or to upset you by calling you names that --
 4 specifically about you? Is it your case -- do you make
 5 that case in your statement against me?
 6 A. I had a quick look, but I do not recall quickly anything
 7 about you calling me those names, but I can have a quick
 8 look.
 9 MR JUSTICE NICKLIN: Okay, I'm having problems hearing again
 10 now.
 11 MS BOLTON: It's because the witness is looking away I think
 12 from the microphone, my Lord. I think he's looking at
 13 his statement. He probably needs to be directed to the
 14 paragraphs. Mr Curtin has got evidence which is in the
 15 main body of the evidence focused on him and he needs to
 16 take the witness to those paragraphs --
 17 MR JUSTICE NICKLIN: Well, it's actually perfectly
 18 legitimate for him to ask the question of whether
 19 Mr Markou considers that he's been targeting him
 20 specifically. That's a perfectly legitimate question.
 21 MS BOLTON: That is, my Lord, but if it tails onto "in your
 22 witness statement", then the witness needs to be taken
 23 to it.
 24 MR JUSTICE NICKLIN: Mr Markou, if you could assist by
 25 answering this question: is your evidence that Mr Curtin

1 himself has targeted personal abuse towards you?
 2 A. Do you mean from my statement, from my written
 3 statement?
 4 MR JUSTICE NICKLIN: Well, just do it from your memory at
 5 the moment. In your time that you have been coming and
 6 going to the Wyton site and you've passed the
 7 protestors -- Mr Curtin is one of those protestors and
 8 you've set out some various examples in your witness
 9 statement -- but from your memory, is Mr Curtin one of
 10 those that you identify as somebody that has targeted
 11 you with personal abuse?
 12 A. He has used words directed to us as a team, from what
 13 I recall, and from -- things like "Those bastards", from
 14 a loudhailer, and directed to me being part of the group
 15 on the site, things like that, and the (inaudible)
 16 dates, like he was throwing insults. But I can't recall
 17 specifically (inaudible) my car, specifically, but, as
 18 a group, with me being part of that group, going in --
 19 coming on to the site, then, yes, he has voiced insults
 20 directed to me as part of the group going in and out of
 21 site.
 22 MR CURTIN: Can I just put it simply to you that I would say
 23 it's ridiculous and it's actually -- I'd go so far to
 24 say that it's impossible that I have targeted you. I do
 25 not know you and I would ask you to accept that the

1 reason that you get shouted at is because you work at
 2 MBR, full stop. It's nothing to do with you, as such,
 3 your personal job -- by being a worker, you get shouted
 4 at. Is that the case or is your case, "No, this is
 5 a personal campaign against Demetris Markou"?
 6 A. I understand you are shouting insults against the staff
 7 members of the company, yes.
 8 Q. Okay. Paragraph 10, five lines down --
 9 A. Yes.
 10 Q. -- where you say:
 11 "... and police assistance was often required to
 12 enter and exit the Wyton Site."
 13 A. Yes.
 14 Q. Isn't it the case -- at least prior to the injunction
 15 and some time initially after the injunction, isn't it
 16 the case that the police were in attendance every single
 17 day at the Wyton site anyway? What do you mean -- you
 18 say they're required. The police used to attend every
 19 single day -- isn't that the case? -- or is it your case
 20 that they had to be called specifically?
 21 A. The police had to be called.
 22 MR JUSTICE NICKLIN: Okay. You need to break the questions
 23 down, Mr Curtin. You put too many thoughts in one
 24 question.
 25 Before the grant of the injunction, Mr Markou, so

1 before August -- so we're thinking about the early
 2 months of the protest -- there was a lot of protestor
 3 activity and Mr Curtin is suggesting to you that during
 4 that period the police were there every day. Now, is
 5 that your recollection or do you recall that there were
 6 some days that they weren't present and you needed to
 7 call them?
 8 A. The police was called to come and assist us to go in and
 9 out of the site. They were not there as, you know,
 10 a post -- a policeman post that they have to be there.
 11 They were called in to be there.
 12 MR CURTIN: Can I put it to you that that's utter nonsense?
 13 It wasn't a case of MBR calling the police every day and
 14 the police being surprised and perhaps having to have an
 15 emergency response. There was -- day in, day out, there
 16 was an established police presence at the gate. That's
 17 the case, isn't it? Not what you're saying, that the
 18 police had to be called. That's utter nonsense.
 19 A. From my understanding, being part of the team, that was
 20 the process from my understanding.
 21 Q. Well, you're wrong --
 22 A. (Inaudible - overspeaking).
 23 MR JUSTICE NICKLIN: Mr Curtin.
 24 Mr Markou, were you responsible for making the call
 25 or were you aware of a call being made on a daily basis

1 to the police?
 2 A. I'm aware of a call being made on a daily basis.
 3 MR JUSTICE NICKLIN: On a daily basis?
 4 A. From what I remember, yes. From what I remember, yes.
 5 Not by me.
 6 MR CURTIN: But you don't really know because you're not
 7 part of the management, are you? You're not part of the
 8 management of MBR; right? Are you part of the
 9 management of MBR?
 10 A. Yes.
 11 Q. You are?
 12 A. Yes.
 13 Q. Could you explain -- you've said you're a line manager.
 14 Is a line manager someone who has some technical
 15 responsibilities for a certain area but there are
 16 a number of line -- are you a senior member of the
 17 management?
 18 A. I am a senior member of staff.
 19 Q. Could you explain to the court -- I thought you were
 20 just a line manager and you're talking on behalf of the
 21 employees. Now could you tell the court what makes you
 22 so -- what part of the senior management do you play,
 23 please?
 24 A. I am a senior member of staff and line manager. A line
 25 manager is part of -- a line manager is part of

1 management on site.
 2 Q. This is confusing. So --
 3 MR JUSTICE NICKLIN: Well, hang on, Mr Curtin. The
 4 relevance of this is limited. The relevance is limited
 5 but let me just try to ask. Mr Markou, if the evidence
 6 of the police were that they had identified that the
 7 protest activities at the Wyton site were going to
 8 require police attendance every day, would that surprise
 9 you?
 10 A. Sorry? Can you repeat that, please? Can you repeat
 11 that?
 12 MR JUSTICE NICKLIN: If the police -- as soon as the
 13 police -- let's say there was an initial call when the
 14 protest began and the police were called because the
 15 protesting activity was felt to be a threat or a risk --
 16 so the police turn up and they make an assessment of
 17 what's going on. Certainly my understanding of the
 18 police evidence is that, from that early point, the
 19 police officers had worked out that there was going to
 20 be a continuing issue of regulating the protestors and
 21 those who needed to get access to the Wyton site, so
 22 from that point forward and at least until the
 23 injunction started to have its effect, the police used
 24 to deploy resources, in other words police officers, on
 25 a daily basis as a matter of routine. They didn't wait

1 for a call from MBR Acres every day to come and attend.
 2 They proactively attended because they knew that,
 3 without police attendance, there was likely to be
 4 difficulties.
 5 A. From my understanding, the police was called to come in
 6 on a daily basis and for the staff to go out because it
 7 was -- to make sure there was police there for us to
 8 safely go in and out. They wouldn't be aware if police
 9 was there -- if we didn't call the police, to know that
 10 they would be there on site and what time they would be
 11 there. So we wouldn't be aware police would be there
 12 exactly at 8 o'clock or exactly at 9 o'clock. We
 13 wouldn't be aware otherwise. We had to call the police
 14 to be there. And the police had to be available to be
 15 there at that time, and sometimes police wasn't
 16 available to be exactly at that time. We had to wait
 17 for police first to be available --
 18 MR JUSTICE NICKLIN: Right, okay. We may be at
 19 a cross-purpose then, Mr Markou. It may be that the
 20 police -- you were regularly in contact with police in
 21 order to confirm the movements of the employees, ie
 22 people are going to be going into the facility at this
 23 time and leaving the facility at some time, and that
 24 then informed the police as to the activities that were
 25 likely to take place on any day. But the police -- what

1 I'm putting to you, suggesting to you, is that the
 2 police were very well aware that there was going to be
 3 the need of police presence at the Wyton site.
 4 A. Yes.
 5 MR JUSTICE NICKLIN: Right. Okay. I think it's about that,
 6 Mr Curtin. It's not that every day they ring up 999 and
 7 say, "There's a group of protestors outside. Send
 8 somebody". I think it is once the protest activity was
 9 established, a method of communicating between MBR and
 10 the police, to notify the police of what the movements
 11 were, informed the police deployment for the relevant
 12 day.
 13 MR CURTIN: My only points here are he's been put up by the
 14 company and he doesn't seem to be the man to answer my
 15 questions.
 16 MR JUSTICE NICKLIN: But where does that get us, Mr Curtin,
 17 in the end?
 18 MR CURTIN: Say, for, his authority to talk on behalf of
 19 this convoy -- he wasn't in charge, he wasn't in these
 20 negotiations and he's shown a woeful ignorance of them.
 21 He's the one that MBR put forward and he's just rambling
 22 of his own personal opinions.
 23 MR JUSTICE NICKLIN: Please don't criticise the witness'
 24 evidence.
 25 MR CURTIN: I didn't mean that by "rambling".

1 MR JUSTICE NICKLIN: Yes.
 2 MS BOLTON: My Lord, it's paragraph 9 of the witness'
 3 statement, and that is actually -- what the witness is
 4 explaining is correct. There may very well have been
 5 a police liaison, but the police presence day-to-day was
 6 informed by what was going on and, as a number of the
 7 staff have explained, they couldn't always -- sometimes
 8 they couldn't get into site because the police weren't
 9 there and they weren't ready. So there might have been
 10 an -- there wasn't a 24/7 person standing there from the
 11 police. There was a liaison officer and then there was
 12 a need to step up or reduce, depending on what was
 13 happening.
 14 So it isn't as is being put across to the witness.
 15 It is -- as your Lordship has just obtained from the
 16 witness, that is what the situation was on the ground.
 17 That's I think where there's confusion here. It wasn't
 18 a case of the police turned up with seven officers every
 19 day and stood there and stayed there and just took it in
 20 shifts. That didn't happen.
 21 So I just make it clear that's what the witness is
 22 explaining there and that's why you've heard a number of
 23 the witnesses say that they wouldn't proceed unless the
 24 police told them it was safe to because some days they
 25 needed more officers, some days they didn't, and so it

1 was a day-to-day changing thing and there always had to
 2 be calls to check what was going on before they came in.
 3 So I do think that's been a little misunderstood as to
 4 what was going on on the ground.
 5 MR JUSTICE NICKLIN: Right. I think we've cleared that up.
 6 But Mr Curtin's base point is that when the protestors,
 7 as it were, got underway in the summer of 2021, there
 8 was -- Mr Curtin will correct me if I'm wrong. He will
 9 ultimately give evidence about this -- but it is that
 10 there was daily presence with the police.
 11 MR CURTIN: Whether there was trouble or no trouble.
 12 MS BOLTON: Well, I'm not sure that that's right because
 13 there certainly wasn't 24 -- that sort of suggests that
 14 there's a police officer stationed outside the gate
 15 when --
 16 MR JUSTICE NICKLIN: No, no, I'm sure that that's not the
 17 case --
 18 MR CURTIN: No.
 19 MR JUSTICE NICKLIN: -- and there may have been days when
 20 the police response -- and I'm thinking of the
 21 famous July incident -- where the police were totally
 22 overwhelmed. Now, the policing response to the protest
 23 does depend on various factors. Probably the most
 24 significant is how many people are there --
 25 MS BOLTON: Yes.

1 MR JUSTICE NICKLIN: -- so whether you send two officers or
 2 whether you have to send 20 depends on the numbers that
 3 are present.
 4 MS BOLTON: Yes.
 5 MR JUSTICE NICKLIN: But the police worked out that this was
 6 going to be a continuing police operation that was going
 7 to require deployment of personnel and officers and
 8 management, so it wasn't a daily responsive activity.
 9 It was the police knew that this was going to require
 10 policing. As to the precise resources that were going
 11 to be required any day, that required discussion.
 12 MS BOLTON: Yes.
 13 MR JUSTICE NICKLIN: Right.
 14 MR CURTIN: Good.
 15 Paragraph 10, you've talked about how, because of
 16 the -- you call it "abuse" -- you find it very
 17 threatening and frightening; correct?
 18 A. Yes.
 19 Q. And you've talked before how unpleasant you found it to
 20 be called those names; yes?
 21 A. Yes.
 22 Q. Now I want to take you to paragraphs 13 and 14.
 23 A. Yes.
 24 Q. Can you see it? I put it to you -- while we're on the
 25 subject of fear, it's quite clear from your evidence --

1 as in a number of witnesses, there's one level of
 2 screaming and shouting and protesting, however
 3 unpleasant that may be for the person that's being
 4 protested against, but isn't it right to say that your
 5 top fear, your main fear, is to be targeted away from
 6 the site? The worst scenario being targeted at home;
 7 would that be correct?
 8 A. It's the same fear, targeted at home and at work.
 9 Q. Pardon? Could you say that again? I heard "It's the
 10 same fear".
 11 A. Targeted at home and at work.
 12 Q. To you it's the same to be targeted at home as it would
 13 be if people were to stand outside your door? For you,
 14 the fear would be the same?
 15 A. Well, the same -- even worse at home because at home you
 16 don't have the police there if you need them to be
 17 there.
 18 Q. So you're driving into work and people are shouting at
 19 you "Scum", "Bastard", and then there's -- 10 o'clock at
 20 night, people outside your front door, shouting, "Scum",
 21 "Bastard", is it the same level of fear, roughly?
 22 A. It's the same level of fear if it's the same people that
 23 were at MBR, and then if they record that and post it
 24 for, you know, protestors to -- on social media.
 25 Q. I put it to you, Mr Markou, that -- I challenge that.

1 I think you're being obstructive to the court. I don't
 2 believe that answer that you just gave. To me, it
 3 seems ...
 4 MR JUSTICE NICKLIN: Well, Mr Markou, if you look at
 5 paragraph 14 of your witness statement, you explain
 6 there that -- you say:
 7 "Since the protests began, I have always been
 8 really worried about being identified by the
 9 protestors and then being targeted outside of work at my
 10 own home. Sadly, targeting at home has happened to
 11 a few of my colleagues who have been identified by the
 12 protestors ..."
 13 And then you give examples of that.
 14 A. Yes.
 15 MR JUSTICE NICKLIN: Then the final sentence:
 16 "I fear that the same will happen to me if I am
 17 identified by the protestors."
 18 Mr Curtin is suggesting to you that the base level
 19 of fear that you had was a daily occurrence of being
 20 shouted at and abused as you arrived or left the Wyton
 21 site. Certainly my reading of paragraph 14 of your
 22 witness statement suggests that there's that -- what
 23 I might call that base level of daily activity that you
 24 encountered, but you had a fear that, because it had
 25 happened to other colleagues of yours, the protestors,

1 if they were able to identify you, might visit your
 2 home.
 3 A. Yes.
 4 MR JUSTICE NICKLIN: And certainly the impression that I've
 5 got from your witness statement is that that would be
 6 a significantly worse thing to happen because you might
 7 be able to deal with the daily going to and from the
 8 site, but to be targeted at home would be a serious
 9 escalation in the protest activity. Would that be
 10 a fair thing to say?
 11 A. Yes, and I was targeted outside work.
 12 MR JUSTICE NICKLIN: Right.
 13 MR CURTIN: Were you targeted by me?
 14 A. No.
 15 Q. Then we won't deal with it. You talk in paragraph 13 of
 16 having some knowledge of protestors. You name one,
 17 Mr Broughton, and you talk of social media.
 18 A. Yes.
 19 Q. Do you have information that you've gathered either from
 20 online articles, from Camp Beagle Facebook or from other
 21 sites or from gossip at work -- do you hold -- have you
 22 got any information about me -- think about it -- that
 23 you haven't put in your statement that you've learned
 24 about me?
 25 MS BOLTON: That's not --

1 A. I've read articles about you, yes.
 2 MR CURTIN: Tell me about those articles, please.
 3 A. That you took part in protests in the past --
 4 Q. Yes.
 5 A. -- as an animal activist.
 6 Q. And that's all?
 7 A. That you were found -- that you were jailed for a period
 8 of time for your activities.
 9 Q. Okay. Anything else?
 10 A. That's all.
 11 Q. Have you ever heard Mr Curtin being discussed as,
 12 "Mr Curtin steals the money from the campaign money"?
 13 Have you ever heard that, "Mr Curtin steals campaign
 14 money"?
 15 A. Sorry, what campaign?
 16 Q. "Mr Curtin steals money from the Camp Beagle campaign",
 17 have you ever heard such -- allegations such as that?
 18 A. No.
 19 Q. Okay.
 20 MS BOLTON: Can I help Mr Curtin here because he's referred
 21 to this Connie Jurtin website that somebody has put up
 22 with a number of these accusations. Just to be very
 23 clear, none of us knew anything about that. That's no
 24 part of our case.
 25 MR CURTIN: Mr Manning did.

1 MS BOLTON: I don't know if Mr Manning did or not. I can't
 2 remember.
 3 MR CURTIN: Mr Manning did.
 4 MS BOLTON: It's no part of our case that those accusations
 5 are -- no one is putting accusations about --
 6 MR CURTIN: It's part of my defence.
 7 MS BOLTON: Well, it doesn't need to be part of his defence
 8 because it's not part of our claim that he's run off
 9 with funds or any of the other personal accusations made
 10 against him by other members of the protest or things
 11 like that. It's not part of our case.
 12 MR CURTIN: My defence will be, before anyone writes
 13 a statement about me, my character has been coloured by
 14 what they've read.
 15 MS BOLTON: But it's not come from our claim. That's come
 16 from other people's websites. It's nothing to do
 17 with -- I appreciate he's aggrieved about it --
 18 MR JUSTICE NICKLIN: Well, why isn't he entitled to explore
 19 with witnesses the extent to which they are aware of
 20 Mr Curtin and how they form their opinions of him? Why
 21 is that not relevant?
 22 MS BOLTON: They've explained how they've formed their
 23 opinions and over what, but it's nothing to do with
 24 these allegations about campaign money or any of the
 25 other personal allegations that have been made against

1 what Mr Curtin may or may not have done whilst he was at
 2 camp.
 3 MR JUSTICE NICKLIN: But you do appreciate that the purpose
 4 of cross-examination is to elicit further information
 5 from the witnesses that may have a bearing on the
 6 defendant's case.
 7 MS BOLTON: But it's no part of the defendant's case -- the
 8 defendant is defending this claim, and this is to do
 9 with things that other protestors have smeared Mr Curtin
 10 over which is nothing to do with our claim.
 11 MR JUSTICE NICKLIN: I understand that.
 12 MS BOLTON: All the witnesses are being asked about it and
 13 I'm just trying to save Mr Curtin the time and trouble
 14 because we're not making points about that and, to be
 15 very clear, there's nothing -- I've not even read this
 16 website that's being referred to.
 17 MR JUSTICE NICKLIN: Okay.
 18 MS BOLTON: So it's no part of our case, because everyone is
 19 being asked about --
 20 MR JUSTICE NICKLIN: I return to the point, which is that
 21 cross-examination is not limited by the claim that
 22 you're making.
 23 MS BOLTON: But it should be limited by what's relevant to
 24 the claim that we're making, my Lord, and the defence of
 25 that claim, and it's got no part of it --

1 MR CURTIN: Mr Curtin --
 2 MR JUSTICE NICKLIN: Mr Curtin, let me deal with it, please.
 3 MR CURTIN: I'm so sorry. I apologise. I don't ever mean
 4 to.
 5 MS BOLTON: Intimidation, verbal abuse, those are
 6 accusations made against Mr Curtin which I don't --
 7 things concerning campaign funds and the like are
 8 nothing to do with -- they're -- if he's upset about
 9 them --
 10 MR JUSTICE NICKLIN: Mr Curtin, it seems to me, is to be
 11 entitled to explore with the witnesses what impression
 12 they have of him and where they get that from. If, for
 13 example, some of the witnesses think that Mr Curtin is
 14 a seasoned activist who might be capable of doing home
 15 visits, somebody who is dishonest and can't be trusted
 16 and therefore adds to the risk he presents, then that
 17 would be relevant and their appreciation of the risk
 18 that he poses to them and the level of intimidation and
 19 harassment and fear that they have in relation to his
 20 activities.
 21 If Mr Curtin is able to establish that they have
 22 formed that belief not by what he's done outside the
 23 Wyton site as part of his protest activities but what
 24 they have read or learned from other people, then that
 25 might have a bearing on whether their fears are real or

1 not.
 2 MS BOLTON: My Lord, I accept that. I just raise that we
 3 seem to be going quite away from that on things that
 4 Mr Curtin doesn't need to be concerned about because
 5 we're not going to be relying on them. That's certainly
 6 the issues of this website and the fundraising issues
 7 that have been raised. That's no part of anything --
 8 MR JUSTICE NICKLIN: Well, I'm sure that Mr Curtin is very
 9 pleased to hear that, but it's not -- that doesn't mean
 10 that he's foreclosed from asking these questions. He's
 11 done so remarkably economically with the witnesses thus
 12 far. It has taken probably a maximum of five or six
 13 questions for him to establish whether the witness knows
 14 anything about the Connie Jurtin site and what they've
 15 learnt from it.
 16 MS BOLTON: My Lord, I understand that. I simply make the
 17 point so that he's clear that we are not pursuing
 18 anything on those lines.
 19 MR JUSTICE NICKLIN: Right.
 20 Carry on, Mr Curtin.
 21 MR CURTIN: So I ask you again, in terms of -- let me just
 22 call it a canteen -- normal workplace gossip -- do you
 23 ever remember discussing anything about me that someone
 24 had heard on the internet, for example that I'd been to
 25 prison? Had you ever had any discussion at work about

1 me along those lines or any discussion from what anyone
 2 had picked up on social media?
 3 A. Yes.
 4 Q. How many times has my name come up? Let me just call it
 5 the canteen, whether you have a canteen or not. Has my
 6 name come up regularly?
 7 A. I do not go to the canteen but I cannot state how many
 8 times your name was brought up because I don't remember
 9 how many times.
 10 Q. But more than once -- I want to move on -- more than
 11 once?
 12 A. Your name has been discussed more than once.
 13 Q. Okay. Let's move on. In terms of -- so do you ever
 14 remember the police coming to the MBR site -- and when
 15 I say "police", perhaps the anti-terrorist squad -- to
 16 come and give a presentation to your workers? Do you
 17 remember this?
 18 A. Anti-terrorist squad?
 19 Q. If I could --
 20 A. I cannot remember it.
 21 Q. If I could help you, do you ever remember the police
 22 coming to the site to address the workers to give them
 23 a talk about security procedures, such as checking their
 24 homes, checking under their cars, because of previous
 25 bomb attacks in the history of the animal rights

1 movement?
 2 A. I don't recall being advised to check under my cars by
 3 anti-terrorist or check my home. I can't recall that,
 4 like being told to check under my car or in my home by
 5 anti-terrorist police. Sorry.
 6 MR JUSTICE NICKLIN: Mr Markou, do you recall ever an
 7 occasion on which a police officer or more than one
 8 police officer attended the MBR site to give advice,
 9 general security advice, to the workers about
 10 protestors?
 11 A. Yes.
 12 MR CURTIN: And what was the nature of that presentation to
 13 the workers? What do you remember? How could you
 14 summarise what they said to you?
 15 A. Just to be alerted about the protestor activities .
 16 Q. I'm sorry, I didn't catch that. Could you say that
 17 again?
 18 MR JUSTICE NICKLIN: Did you say --
 19 A. Just to be alerted.
 20 MR JUSTICE NICKLIN: -- being alert to protestor activities?
 21 A. Yes, that we are alert at site that, you know, the
 22 nature of our job can attract these kinds of activities .
 23 MR CURTIN: And did they give you examples of previous
 24 actions that activists have taken over the years?
 25 A. I'm sorry, I can't remember.

1 Q. Okay. Are you aware of -- at Camp Beagle there's lots
 2 of shouting and protestors. Are you aware of far more
 3 serious criminal incidents in the history of the
 4 anti-vivisection movement? Are you aware of militant
 5 activities, militant criminal activities? Have you an
 6 awareness of this?
 7 A. Yes.
 8 Q. And some of the actions that have taken place in the
 9 past would be alarming for you. I'm asking you to
 10 accept that, from what you know of in the past, there
 11 have been some very, very, very, very strong actions
 12 taken that have resulted in people, if they were caught
 13 for those actions, being imprisoned for a number of
 14 years -- very serious actions; violence and extreme
 15 attacks on property and houses. Are you aware of such
 16 actions taking place in the past?
 17 A. Yes.
 18 Q. Through your entire statement there's the word "the
 19 protestors". You have a term, "the protestors". It's
 20 in your statement God knows how many times. You
 21 continually refer to "them" and "the protestors"; is
 22 that correct?
 23 A. Yes, I use that term in my statement.
 24 Q. So when you write "the protestors", who do you refer to?
 25 In case you were recognised by the protestors -- to

1 prevent the protestors getting too close, not being
 2 aware of what the protestors would be able to do.
 3 "I fear that the same will happen to me if I am
 4 identified ..."
 5 Who are the protestors in your mind? Every time you
 6 write "the protestors", what do you mean?
 7 A. Those protesting against our site, against our work --
 8 Q. So anybody -- sorry.
 9 A. Those linked with the protest activities on site and
 10 what they post on social media against us.
 11 Q. So anybody that protests about how you breed the
 12 puppies, how you treat the puppies and what happens to
 13 the puppies not only at your site but once they're taken
 14 to the laboratory -- anybody that has a problem with
 15 that, they become "the protestors"; is that correct?
 16 A. They protest for that reason, so, yes, they are part of
 17 the term "protestors". If they protest against that
 18 reason, but -- against the company, then, yes, they are
 19 considered protestors for me.
 20 Q. Okay. Are you aware of, in this case, some attacks on
 21 the houses of Mr Manning and some of the other workers?
 22 Are you aware that there have been some attacks in this
 23 case?
 24 A. Yes.
 25 Q. Is it your case that those attacks were carried out by

1 the protestors?
 2 A. Those cases were carried out by people that were linked
 3 with the activities outside our work. In my view, they
 4 were protestors.
 5 Q. In your view they are protestors, okay.
 6 MR JUSTICE NICKLIN: Mr Curtin I think is trying to ask you
 7 whether you draw a distinction between protestors who
 8 engage in what might be called the more extreme
 9 activities of targeting employees' homes and those
 10 protestors who merely stand at the entrance to the site
 11 and hold a placard, for example.
 12 A. Those that hold placards outside work can also be the
 13 same protestors attacking homes and the same protestors
 14 that I have to confront outside work. So they can have
 15 the same role, but it can be on site --
 16 MR JUSTICE NICKLIN: So you don't draw a distinction between
 17 them?
 18 A. It's a grey line. I cannot -- to me, they're considered
 19 protestors so -- they can change their role whenever
 20 they can so when do I change my perception against them?
 21 I hope you understand. They can be there but they can
 22 also attack our homes and confront us outside work, so
 23 there's no distinction in my view between them.
 24 MR JUSTICE NICKLIN: Okay. Thank you.
 25 MR CURTIN: Then your statement makes more sense, then,

1 doesn't it, that the protestors outside the gates and
 2 the protestors outside somebody's house -- it makes
 3 sense then that you should have -- because they're the
 4 same people. They -- yes.
 5 A. I don't -- yes, I don't know if they're the same people
 6 until we were told they were the same people.
 7 Q. Yes, you've made that clear now. Okay. Let's move on.
 8 MR JUSTICE NICKLIN: Okay, we're not going to move on now
 9 because we're going to have our break for the
 10 transcribers. We'll come back at 12.15; all right?
 11 MR CURTIN: Okay.
 12 (12.03 pm)
 13 (A short break)
 14 (12.17 pm)
 15 MR JUSTICE NICKLIN: Right. Okay, Mr Curtin.
 16 MR CURTIN: If I can take you to -- ah, one last thing
 17 actually before we go on to that. Go back to
 18 paragraph 14, the first sentence:
 19 "... I have always been really worried about being
 20 identified by the protestors and then being targeted
 21 outside of work ..."
 22 Yes?
 23 A. Yes.
 24 Q. Now, you worked at Envigo before working here. You're
 25 aware of the controversial nature. Before Camp Beagle,

1 were you already concealing your identity to some
 2 degree? For example, if someone asked you at a party,
 3 "Where do you work?", one of your answers might not
 4 necessarily be, "I work -- I breed puppies for
 5 vivisection". You would maybe give vague answers; you
 6 wouldn't give clear answers. This is before
 7 Camp Beagle. When asked by a stranger or a protestor or
 8 asked by other people, I put it to you that you already
 9 learned to conceal your identity because of the
 10 controversial nature of the work you're involved in. Is
 11 that correct?
 12 A. I would tell to people that I trust what I do for
 13 a living, (inaudible).
 14 Q. What about -- like I said, a stranger at a party, "What
 15 do you do, mate?", what would your answer be? Before
 16 Camp Beagle this is.
 17 A. I know this is a sensitive matter so I wouldn't just say
 18 to anybody what I do for a living.
 19 Q. Okay.
 20 A. Anybody unknown.
 21 Q. Right. Let's move on, paragraph 22. This involves
 22 a very short video where your evidence is, and I don't
 23 dispute it, that there was a car which you've been told
 24 by the claimants -- whether it's mine or not, but I take
 25 responsibility for it -- a red Corsa -- there was a car

1 parked at the entrance of the gates. That's what this
 2 video relates to; yes?
 3 A. Yes.
 4 Q. I want to ask you, whilst making this statement of your
 5 own free will, why did this particular video come to
 6 your mind that you wanted to put it into your statement?
 7 Your statement, there's a claim against me. Why did you
 8 put this particular statement of my car being parked?
 9 What was it that came to the top of your agenda and the
 10 top of your consciousness that this needed to go into
 11 your report?
 12 A. On that day, 25 July 2021, I was at work and we couldn't
 13 get out of work because your car was blocking the
 14 entrance.
 15 Q. But the evidence -- we can watch the video if you
 16 choose. It's very, very short -- and it indeed shows my
 17 car parked by the access road, but there's also a lot of
 18 cages in front of the gate and it doesn't last for very
 19 long. There's nothing in your statement about how long
 20 my car was parked there for, when it left. It's just my
 21 car -- it's a very brief video, just my car being
 22 parked, and that's it. It doesn't give a story of how
 23 my car blocked your road that day, does it?
 24 A. No, but your car is blocking the road along with the
 25 cages.

1 Q. Okay. I'm not sure how long the video lasts. I think
 2 it's under a minute --
 3 MS BOLTON: I think you probably need to take the witness to
 4 it.
 5 MR CURTIN: Okay, let's take you to the video. 55.
 6 MR JUSTICE NICKLIN: Are you sure? It says "56" in the
 7 statement.
 8 MR CURTIN: 55 and 56.
 9 MR JUSTICE NICKLIN: Oh, 55, all right.
 10 MR CURTIN: Is that 55?
 11 THE EPE OPERATOR: 55.
 12 MS BOLTON: It's 56 you want to see.
 13 MR CURTIN: Yes, 56.
 14 (Video played)
 15 Okay, you just saw the red car. I accept that's me
 16 driving the car. The car is parked at the entrance and
 17 at the end of the video, the one and a half minutes, it
 18 actually seemed to be reversing; is that correct?
 19 A. Can I see the video? I can't see the video. Can you
 20 show me the video?
 21 MR JUSTICE NICKLIN: Can we try to play it again?
 22 Mr Markou, can you tell --
 23 A. Yes, I can see it now, yes.
 24 MR JUSTICE NICKLIN: Okay, good.
 25 (Video played)

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1 Okay, we've watched it.
 2 MR CURTIN: Did you see the video?
 3 A. Yes.
 4 Q. And you saw the car?
 5 A. Yes.
 6 Q. Were you prompted -- isn't it correct that you were
 7 prompted -- the claimants' solicitors told you that that
 8 was my car?
 9 A. This was the -- my statement, just a moment. "Parked
 10 his car", so they told me that was you in the car, yes.
 11 Q. Okay.
 12 A. I'm not aware it's your car or not but you were in the
 13 car.
 14 Q. Okay. That video lasts for one and a half minutes and
 15 in that time you can see the car doing some minor
 16 movements and then the last thing you see is the car
 17 reversing away out of shot; is that correct?
 18 A. If the last part of the video -- what I see now, your
 19 car is still there.
 20 Q. It's gone back to the start. Yes, look at this. This
 21 is the last few seconds.
 22 (Video played)
 23 And then from that it goes back to the start. The
 24 car is moving away.
 25 A. Okay. So you are adjusting the car, yes.

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1 Q. Well, yes, the car is moving out of shot; is that
 2 correct? Can you accept the car is --
 3 A. The car isn't moving out of the shot. The car is still
 4 there.
 5 Q. Yes, but it's moving out of shot --
 6 A. The car is still there.
 7 Q. But it's moving out of shot, isn't it? "Yes" or "No"?
 8 A. I can still see the car.
 9 Q. The last thing you see is the car -- it appears to be --
 10 who knows what it's doing? It appears to be reversing
 11 and -- as far as it looks. We don't know what happens
 12 after this, do we?
 13 Anyway, can you see the police officers present?
 14 A. Yes.
 15 Q. They're not engaging with the parked car, are they?
 16 A. I don't see them engaging in that, no.
 17 Q. And do you see the cages in front of the gate?
 18 A. Yes.
 19 Q. They're blocking the gate; yes?
 20 A. Yes, they are.
 21 Q. When you said -- you put in your statement that you were
 22 trying to leave the site at this point. Is that your
 23 evidence?
 24 A. Yes. We were on site on that day, yes.
 25 Q. It's 12 o'clock -- that's the timer, 12.00 pm; yes?

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1 12.00 noon?
 2 A. Hmm--hmm.
 3 Q. Do you remember why you were leaving the site that day
 4 at that time because normally you would leave site --
 5 normal working hours would be 8 o'clock to 4.00 pm.
 6 A. I cannot recall exactly, but at the start of the protest
 7 we had to follow the advice from police as to when it
 8 was safe to enter and leave the site -- because of
 9 increased activity, make sure we are safely on site and
 10 safely off site.
 11 MR JUSTICE NICKLIN: If it makes any difference, the
 12 25th was a Sunday.
 13 MR CURTIN: Ah. That does make -- that's the end of your
 14 working day, isn't it, 12 o'clock on a Sunday? So
 15 that's why you're leaving work; is that correct?
 16 A. As I said previously, at the start(?) of the
 17 protestors -- protests in 2021, we had to follow the
 18 police advice as to when we would leave the site. It
 19 was earlier than usual or later than usual.
 20 Q. Okay. Is it correct that at MBR Acres, on a weekday,
 21 the workers who look after the animals, who are there to
 22 tend to the animals, leave at 4.00 pm, whereas, on the
 23 weekend, it's typical for the workers to leave at
 24 12.00 pm and not return until the next morning? Is that
 25 correct? Simple question.

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1 A. That's not -- that's not correct. That's not correct.
 2 Q. Tell me what is correct, then, about the weekend as
 3 opposed to the weekly -- you're saying I'm blocking the
 4 gate at 12 o'clock. You need to get out. I'm asking
 5 you to explain the normal work rotas for the people who
 6 are meant to be in charge of maintaining the animals.
 7 Is it correct that on a weekday it's 8.00 till 4.00? Is
 8 that correct, roughly?
 9 A. That's the usual working hours, yes.
 10 Q. Is it usual at the weekend, 8.00 till 12.00, which is
 11 the time on this video?
 12 A. It depends on the team working on the weekend.
 13 Q. I put it to you there's absolutely -- as much as the
 14 weekday is 8.00 till 4.00, I think you're being
 15 obstructive. Weekends, we're talking 8.00 to 12.00,
 16 7.00 to 11.00, something along those lines.
 17 MS BOLTON: Can he stop accusing the witness of being
 18 obstructive? The witness is answering the questions and
 19 Mr Curtin obviously feels that the witness' hours are
 20 different. He can put that to him, but it's not
 21 a matter of obstruction and that's not fair.
 22 This is quite a nervous witness. Employees have
 23 been very, very scared about this process and that's not
 24 helpful.
 25 MR JUSTICE NICKLIN: Right. Mr Curtin, try to avoid

1 commenting on the witness' answers; all right?
 2 MR CURTIN: Is there a pronounced difference between the
 3 working hours of a weekday and a weekend?
 4 A. Yes.
 5 Q. Is it fair to say at the weekend -- at the weekday,
 6 there's the full team with the full complement of
 7 workers, as long as no one was off sick, and they would
 8 run 8.00 till 4.00? At the weekend, everything changes,
 9 there's a relatively small skeleton staff. It's routine
 10 perhaps. On a weekday, there will be perhaps 12/15
 11 dog workers. Of a weekend, that goes down to three or
 12 four and they go in for four hours. Isn't that correct
 13 as an absolute pattern?
 14 A. No. On weekends we could also work in the afternoon --
 15 we could also return in the afternoon.
 16 Q. Say again. At the weekend, what about the afternoon?
 17 You're on oath.
 18 A. We would also return in the afternoon.
 19 MR JUSTICE NICKLIN: I didn't hear the answer. Sorry, could
 20 you repeat the answer, please?
 21 A. On weekends we would normally also return in the
 22 afternoon.
 23 MS BOLTON: They return in the afternoon.
 24 MR JUSTICE NICKLIN: Employees return in the afternoon?
 25 A. Employees would return in the afternoon, yes.

1 MR JUSTICE NICKLIN: Right.
 2 MR CURTIN: So the week, the full complement of workers,
 3 every staff member available; at the weekend they go
 4 down to a skeleton crew. So I put to you the case is
 5 it's absolutely normal for it to go down to a skeleton
 6 crew at the weekend and the workers, perhaps four or
 7 five of them, go in at 8 o'clock and they leave at
 8 12.00. Over the past six months it's been a pattern
 9 where perhaps two workers go in for perhaps half
 10 an hour, say from 4.00 to 4.30. Is that what you're
 11 referring to when you say "We go back"? But at this
 12 time, in July, once the workers left at 12.00, that was
 13 it until 8 o'clock tomorrow morning. That has changed
 14 in the past eight -- six months. Now, workers in fact
 15 at a weekend do go in for -- perhaps two workers go in
 16 on a Saturday and a Sunday for between half an hour and
 17 an hour; is that correct?
 18 A. It's not for the past six months. We've tried it for
 19 a while now.
 20 Q. What does "a while" mean?
 21 A. More than six months.
 22 Q. Were you doing -- this is back to July, right at the
 23 start of the campaign. I put it to you, once the
 24 workers leave at 12 o'clock, they don't -- in that
 25 period they were not returning until 8 o'clock the next

1 morning. Is that correct at that time by your memory?
 2 A. That's correct. We were following what is advised as to
 3 our safety, when we should go in and out, based on the
 4 activity outside.
 5 Q. Is it your suggestion to me that the police are
 6 instructing -- advising the workers that, having left
 7 the site at 12 o'clock, with no animal workers on
 8 board -- are you telling me it's the police advice to
 9 you that you shouldn't go back until 8 o'clock tomorrow
 10 morning at that time? It's the police who were in
 11 charge of MBR's rota; is that what you're telling the
 12 court?
 13 A. No.
 14 Q. It's what you just said, though, that it was dependent
 15 on the police. Which one is it?
 16 A. The police will advise when it will be safe to go on
 17 site.
 18 Q. Okay. Let's move on. Will you accept from me that this
 19 video showed my car parked for one and a half minutes at
 20 the road and that's all it shows?
 21 A. I can see a car that you drive. They are on the
 22 accessway to the main road, to the highway.
 23 Q. I've got one more question about this. It might turn
 24 into a few.
 25 On this day, do you remember anything special about

1 this day, as in do you remember anything about an
 2 incident, that there was talk of a dog being put into
 3 a boot and then the police were called. Demonstrators
 4 were worried that they were going to take the dog out or
 5 sneak the dog out. This is just an open question.
 6 Do you remember anything specific about that morning of
 7 25 July?
 8 A. I don't -- I cannot remember that incident linked to
 9 that day, I'm sorry. It's been over -- about a year
 10 since that incident.
 11 Q. In your experience, the whole time you've been --
 12 throughout the entire existence of Camp Beagle, I put it
 13 to you that this was extremely rare incident, that you
 14 were actually blockaded. Well, in fact this incident
 15 doesn't show how long you were blockaded. How long
 16 were you blockaded on this day? Do you know?
 17 A. I cannot recall, I'm sorry.
 18 MR JUSTICE NICKLIN: Mr Markou, do you accept the suggestion
 19 that Mr Curtin has made, that it was an unusual event
 20 for you to be physically blockaded into the site?
 21 A. No. At some point it was on a daily -- almost on
 22 a daily basis. At some point it was almost on a daily
 23 basis -- at some point.
 24 MR JUSTICE NICKLIN: Where there were physical obstructions
 25 placed in the gateway?

1 A. Yes.
 2 MR CURTIN: I put it to you that that's not correct, that
 3 you're embellishing the truth and this was an extremely
 4 rare occurrence. Look at the action -- look at the --
 5 you've just seen the video. For example, the police in
 6 the background were not too upset. I put it to you this
 7 was a rare event, one last time.
 8 A. I disagree.
 9 Q. Okay. Right, we need to go on to the video, on to the
 10 incident of 15 August, which was a large demonstration
 11 that took place. From paragraph 23 [video 205].
 12 (Video played)
 13 Can we hold it there?
 14 My Lord, I really am thinking of time.
 15 MR JUSTICE NICKLIN: If we haven't finished by 1 o'clock,
 16 we'll carry on tomorrow.
 17 MR CURTIN: Okay. I really would have liked to speed this
 18 up but I'm also -- I was going to suggest let's get the
 19 rest of the questions out and see if we can -- because
 20 I may have to show the entire video, which is ten
 21 minutes of this, but -- it might be necessary, unless
 22 the ...
 23 MR JUSTICE NICKLIN: Okay.
 24 MR CURTIN: I do feel that time --
 25 MR JUSTICE NICKLIN: Don't worry about it.

1 MR CURTIN: Okay. Thank you.
 2 I think for the purposes, let's show the video and
 3 I'm going to stop/start it.
 4 MR JUSTICE NICKLIN: Well, before we do that, it will
 5 probably be helpful for everybody if you outline in
 6 general what you say we will see when we watch this so
 7 that the witness knows what he's looking out for -- all
 8 right? -- what features you say you want him to note in
 9 the video.
 10 MR CURTIN: Okay. I put it to you in this next video what
 11 you'll see, the scene of again I would say an unusual
 12 event. It's of a demonstration when there were --
 13 I think you describe it as "hundreds of people" --
 14 a very large demonstration, and what I invite you to
 15 look at in this video -- because you talk in your
 16 statement of the fear you had of being told that there
 17 were hundreds of protestors. I put it to you that this
 18 video -- in fact, if I could point you to paragraph 24,
 19 the second line, "One of the protestors ... Mr Curtin
 20 ...", and you saw me marshalling the protestors. Do you
 21 remember? Have you got that in your statement?
 22 A. Yes.
 23 Q. And you will see, throughout the entire video of this,
 24 Mr Curtin indeed marshalling the protestors and rather
 25 than, by the time you arrive, facing a mob where

1 everyone is doing whatever they want, in fact Mr Curtin
 2 is one of the people marshalling the crowd to absolutely
 3 make sure that your cars enter the site relatively
 4 unimpeded compared to what might have happened if
 5 I hadn't been there marshalling. So what you're going
 6 to watch in this video is Mr Curtin helping to
 7 facilitate a peaceful protest. Noisy, yes, passionate,
 8 yes, but peaceful, with no illegal incidents. That's
 9 what I'm inviting you -- that's what I say you're going
 10 to see in this video.
 11 MR JUSTICE NICKLIN: Right. Let's watch it.
 12 (Video played)
 13 MR CURTIN: Pause it slightly.
 14 I would ask you to pay attention also to the words
 15 of the lady in question, and it would be my case that
 16 she, along with me, was marshalling. This is a team
 17 effort to marshal. Thank you.
 18 (Video played)
 19 Stop there.
 20 I put it to you that what you've seen there is the
 21 protestors and they're actually -- they're at least
 22 professing that they are worried about the fact that you
 23 haven't gone into work, not the fact that they don't
 24 want you to go into work. In fact the opposite is true.
 25 You've put in your statement -- well, first of all, is

1 that — would you accept that that's what appears to be
 2 happening, that the protestors are actually worried
 3 because you haven't gone in?
 4 A. That's the lady's statement, yes.
 5 Q. On paragraph 23:
 6 "The protestors obstructed access to the Wyton Site
 7 from around 10:17 and continued to do so thereafter."
 8 Where does the 10.17 come from because you were
 9 meant to go to work — the workers should have been in
 10 by 7 o'clock or 8 o'clock. Why have you put 10.17 in
 11 your statement? I just want to know.
 12 A. As I mentioned in my statement, on the first days of the
 13 protestors being there, we would meet in an agreed place
 14 somewhere outside work at an agreed time before it's
 15 time to go in and wait for advice as to why it's safe to
 16 go on site. So we would meet before the agreed time,
 17 before the time to go in on site, but to wait until they
 18 give us all clear, that it's safe for us to drive
 19 unobstructed on site.
 20 Q. So is it going to be a joint — were you part of the
 21 decision-making? As you were parked in the convoy,
 22 are you part of the — I'm not quite sure what role you
 23 played in terms of senior management. Was it one of
 24 your roles to directly liaise with the police as to when
 25 the vehicles should go in?

1 A. No.
 2 Q. I take you to the middle of that paragraph — let's
 3 carry on with the video actually. Ah — I put it to
 4 you — I've stopped the video there. I ask you to
 5 listen out for a gravelly voice on a megaphone, which is
 6 me. You can actually see me with the megaphone and
 7 I ask you to listen out for the words. Some of it can
 8 be indistinct. What you're about to hear straightaway
 9 is me saying, "This stinks. They are using [forgive the
 10 court, but it was my language] they are using the
 11 fucking dogs today, they use them every day, but this is
 12 a game for them, a political game, to do with the
 13 injunction. Keep the focus everyone". I'm asking you
 14 to listen out for those kind of words, me saying to
 15 everyone that this is a trap. It may be indistinct.
 16 Let's play the video and see if you hear that, "This
 17 stinks".
 18 (Video played)
 19 "This absolutely stinks"
 20 (Video played)
 21 Can we stop the video there? Did you just hear
 22 someone shout, "They're coming"?
 23 A. Yes.
 24 Q. "I think they're coming. Clear the gates. They're
 25 coming". Now, when we replay the video now, I ask you

1 to listen out for the words, which is not by me —
 2 I would say a man called Mel Broughton, but another
 3 organiser, "When they come, just move and let them in".
 4 Okay, play the video. Also — no, don't play the video
 5 yet. Also — so I ask you to look — there's
 6 definitely — an aim of the protestors is to get the
 7 vehicles in. Again, you will hear the woman's voice,
 8 "As you can see, we are all moving out of the way, we
 9 are clearing the way".
 10 Let's watch the video.
 11 (Video played)
 12 Can we stop there? I'm asking you to accept — you
 13 don't have to at all, but I've transcribed the words,
 14 "Let's show these [forgive my language] fuckers what
 15 discipline looks like, what community looks like. We
 16 are letting them in". Do you accept my version so far?
 17 A. Your version? I can't understand the point of this
 18 question.
 19 Q. I'm asking you to look out for — you're in the lay-by,
 20 you talk of being terrified of all these people. As you
 21 approach these people, you talk in your statement of
 22 being scared and you don't know what they're going to
 23 do. What you don't know is that, amongst the
 24 protestors, there are people who are actually actively
 25 organising to make sure that this unusual day, when

1 there are hundreds of people around, goes well and goes
 2 smoothly and peacefully actually for you as a worker.
 3 So my point is that Mr Curtin is definitely trying to
 4 help you to get into work, on this occasion at least.
 5 A. I disagree.
 6 Q. What makes you disagree? Let's watch more of the video
 7 and we'll come back to this.
 8 (Video played)
 9 Stop there. I'm heard on the megaphone there, but
 10 I don't think you're going to accept it — it's me
 11 saying, "Let's show them beautiful love and compassion".
 12 A. If you play the video, it will show the compassion
 13 later, that you are —
 14 Q. Pardon?
 15 A. If you play the video, we can see what compassion you
 16 are talking about.
 17 Q. Okay. Excellent. Let's play the video.
 18 (Video played)
 19 Stop the video. You talk of being terrified and
 20 it's up to you how you feel, but there are a large
 21 number of police around your cars, aren't there? There
 22 are a number of police?
 23 A. There is police around our cars, yes.
 24 Q. Okay, thank you.
 25 (Video played)

1 not a way to pacify the protestors, by saying "This
 2 stinks", so I do not agree with your statement, with
 3 what you describe.
 4 MR JUSTICE NICKLIN: Mr Markou, having watched the video and
 5 looked closely at what Mr Curtin was doing, would you
 6 accept that Mr Curtin was trying to facilitate the
 7 passage of the vehicles of the workers into the site?
 8 A. Yes.
 9 MR CURTIN: Finally.
 10 MR JUSTICE NICKLIN: It's 1 o'clock, Mr Curtin, so we'll
 11 stop now, unless you've got only one or two further
 12 questions on this video -- this video.
 13 MR CURTIN: Ah, the video, yes. I'm finished with the
 14 video.
 15 MR JUSTICE NICKLIN: That's fine.
 16 Right. I'm afraid, Mr Markou, you'll need to come
 17 back tomorrow. I'm sorry for the inconvenience that
 18 causes but we aren't able to sit this afternoon. All
 19 right?
 20 A. Hmm--hmm.
 21 MR JUSTICE NICKLIN: Right. Tomorrow at 10.30. Thank you
 22 very much.
 23 (1.03 pm)
 24 (The hearing adjourned until
 25 Thursday, 4 May 2023 at 10.30 am)

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