



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

Day 10

May 11, 2023

Opus 2 - Official Court Reporters

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1 Thursday, 11 May 2023
 2 (10.30 am)
 3 MR JUSTICE NICKLIN: Right. Mr Curtin.
 4 MR CURTIN: Yes.
 5 MR JUSTICE NICKLIN: The moment has come. You've got two
 6 distinct roles today. The first, if you choose to
 7 exercise it, is your right to make an opening speech.
 8 That is to tell me in broad terms what your case is.
 9 Bear in mind that I've read the documents that you sent
 10 me, your defence, and the documents that you sent to me
 11 before the trial, setting out your case, so I largely
 12 know what your case is. But you have the opportunity to
 13 make a statement explaining what your case is.
 14 Then, after you've finished that, it will be then
 15 time for you, if you choose, to give evidence. That
 16 will consist of you going into the witness box,
 17 confirming your witness statement and any other
 18 documents that need to be confirmed, as you've seen
 19 other witnesses do, and then Ms Bolton will have an
 20 opportunity to ask you some questions herself. All
 21 right? Does that make you clear?
 22 MR CURTIN: Yes.
 23 MR JUSTICE NICKLIN: Were you expecting that today?
 24 MR CURTIN: Yes.
 25 MR JUSTICE NICKLIN: Good. Excellent. Right, so what

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1 would you like to tell me by way of your opening speech?
 2 MR CURTIN: I do that from here?
 3 MR JUSTICE NICKLIN: Yes.
 4 Submissions by MR CURTIN
 5 MR CURTIN: I'd see it as a help if my Lord wanted to
 6 intervene and ask me some questions because I'm kind of
 7 giving a monologue here.
 8 So my defence is a simple defence. I don't think
 9 there's -- hardly any of the physical evidence so far
 10 that I've come across, especially the evidence that
 11 I went through with the witnesses -- the physical events
 12 on the ground have been captured by cameras and people,
 13 it's all been in broad daylight in my case, so I'm not
 14 disputing identity or whether I was there or not. What
 15 I'm disputing is the claimants' readings into my action,
 16 which I am proud -- I may have made some mistakes which
 17 may come out during the cross-examination or it may not.
 18 I'm a human being, I've spent 22 months living on the
 19 side of that road and I'm proud of it.
 20 The evidence bundle here reads -- the way it's
 21 presented to me, it reads like a catalogue of horrors,
 22 like a mob has been unleashed on MBR. In my evidence
 23 I would like to point out to my Lord that, yes, there's
 24 been the non-stop energy at the gates. When I first
 25 arrived, I noticed how strong this energy was and it's

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1 still strong to this day, and I'll come to that in
 2 a minute. But the first thing I would like to -- in my
 3 defence is to say the positives of the camp. By being
 4 there, by our physical presence, it has inspired people
 5 all over the world. We've allowed -- we've been,
 6 I would say, instrumental in putting animal experiments
 7 where it belongs, back in the open.
 8 One of the witnesses, Wendy Jarrett, her evidence
 9 was that we needn't have protestors. I utterly condemn
 10 that. Yes, the writing is on the wall for animal
 11 experiments, but it needs a push -- more than a push, it
 12 needs a shove. Their own witness talked about wanting
 13 to see the end of animal experiments, so there we have
 14 something in common, but to say that we don't need
 15 protests is a ridiculous comment really.
 16 Can I just describe it? The very simple role of the
 17 camp is just to be there as a physical presence.
 18 I mentioned Greenham Common in my -- as one of my
 19 questions to one of the witnesses and the camp being
 20 there, I think it's a great local amenity. It means
 21 that people can stop -- and they do every day -- and
 22 we're famous for our tea and cake and people can engage
 23 with us face to face. I say "us" because it's like
 24 a community, a very fluid one, but people get to come
 25 and stop.

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1 One of the very common things here -- I've had it
 2 said to me by court officials, when we've discussed the
 3 case -- "I thought it didn't go on anymore". It's one
 4 of the most common responses, "I thought those things
 5 had stopped". It's interesting for me because I've been
 6 involved for 40 years and, if I took a time machine back
 7 even just 20 years, 20 years ago, a very common
 8 perception would have been, "Well, what about my baby?
 9 Are you telling me that they shouldn't have safe
 10 medicine? What about my granny? We need these
 11 medicines and we need these animal experiments".
 12 To me, the situation now is that vivisection, animal
 13 experiments, they went off the agenda and now they're
 14 back. People are embracing the fact we're in the
 15 21st century and there is -- and Camp Beagle has been
 16 part of it -- a growing demand for change. I feel that
 17 the science is bankrupt as well as morally.
 18 So the camp. We've organised parliamentary
 19 petitions. In my defence, it would not be my goal and
 20 it's not one I've gone down, is to -- I do want
 21 MBR Acres to shut down. It will be one of the happiest
 22 days of my life when it happens. A strategy that I have
 23 not employed to shut that place down is by targeting
 24 individuals, by targeting workers. It's a place -- it's
 25 a beagle breeding factory. None of the workers talked

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1 of a particular highly specialised skill set that I can
2 work out. If you get rid of one worker, another one
3 will arrive, if you get rid of one security guard,
4 another, which is why from the beginning -- is there
5 a time limit to this? No.

6 If I can begin -- I'll do it chronologically like
7 I did with the witnesses. That's probably going to --
8 because I haven't got anything prepared as such. I have
9 a history with this site. I was indeed imprisoned.
10 I was caught in 1990 for what I would see as liberating
11 beagles from the site when it was run by another
12 company. However, the law being the law, I was charged
13 with property, I was charged with burglary. I was found
14 guilty of that. I did go for an honest intent, in my
15 defence, but the jury, in their wisdom, declined that.
16 I was found guilty and sentenced to 18 months.

17 MR JUSTICE NICKLIN: Which crown court was that?

18 MR CURTIN: Leicester Crown Court. Part of my defence in
19 that, the honest intent, was I felt the law was letting
20 these animals down and I had tried -- I'd written to the
21 MPs, I'd done the petitions, I'd lobbied. I had done,
22 I felt, all the legal means open to me and it was a last
23 resort.

24 MR JUSTICE NICKLIN: How old were you then?

25 MR CURTIN: I was born in 63. Could you do -- 27.

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1 MR JUSTICE NICKLIN: Yes.

2 MR CURTIN: There's something -- I've been involved a long
3 time, 40 years. Actually, there's something regarding
4 my past that I kind of don't want to speak about.

5 MR JUSTICE NICKLIN: You don't have to.

6 MR CURTIN: I've spoken about --

7 MR JUSTICE NICKLIN: You have revealed in your questioning
8 so far your conviction that you've just told me about in
9 relation to breaking into the Wyton site and removing
10 a number of dogs. You would have been rehabilitated in
11 the eyes of the law in relation to that offence and,
12 strictly, if you hadn't decided to waive your rights in
13 that respect, Ms Bolton would have needed my permission
14 to ask you questions about it because the law says that,
15 after a while, people are to be treated as if they've
16 been rehabilitated --

17 MR CURTIN: Yes.

18 MR JUSTICE NICKLIN: -- so you're in that position. I don't
19 know whether you've got any subsequent convictions, but
20 Ms Bolton, if she wants to ask you questions about any
21 other convictions, she'll need -- if they are ones that
22 are now spent and you're rehabilitated -- she'll need my
23 permission to ask you questions about those. So you
24 don't need to volunteer anything more about your
25 background unless you wish to.

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1 MR CURTIN: I'll leave it at this for now, that my
2 involvement in the animal liberation movement -- and
3 it's been part of my life since I was 20 -- it was
4 relating to a dog. I went out with a vegetarian woman
5 for years and I went to live in Ireland. I had a dog
6 die in my arms and I had a Road to Damascus jobbie.
7 I was brought up Roman Catholic and I kind of believed
8 that until then, until that dog died, that I was a human
9 being and this was something called an "animal". That
10 dog dying blew the whole thing away and this was my
11 brother, this was my sister, and we were equals.

12 I came back to England and I joined the animal
13 liberation movement, which I knew was there. I looked
14 for it, and from then -- from 1984 up until the early
15 2000s, I would say there's a block -- we could call it
16 the first 15/20 years -- a block of -- I was doing
17 campaigning throughout that, but involvement in
18 illegal -- I don't know what the word is. I could call
19 it "militant", "extreme" -- illegal direct actions.

20 MR JUSTICE NICKLIN: Okay. You don't have to tell me about
21 anything and you specifically don't have to tell me
22 about your involvement -- anything that might disclose
23 your commission of any criminal offence, so be careful
24 about that.

25 MR CURTIN: Yes. For me, it actually goes in my defence

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1 because it's a block of behaviour which is non-stop.
2 I was on a revolving door.

3 MR JUSTICE NICKLIN: Can I summarise it this way because
4 I picked up in your questioning -- would it be a fair
5 summary of the position to be that, in your youth, you
6 took a much more activist approach to protesting, but
7 your approach to protesting over the years has changed
8 and that you have adopted or tried to adopt protest
9 methods that keep you within the law?

10 MR CURTIN: That wouldn't be how I would put it because that
11 would lead me to think I was -- and I was when I was
12 20 years old. But Britain was a different place. The
13 animal liberation movement was a different place. My
14 defence wouldn't be that I was a crazy kid, I was naive
15 and I grew up. If anything, the movement has changed,
16 the movement, and I've moved around that, I've moved
17 with it, and I don't need to go into any morals or
18 ethics. For me, it became natural and tactical to obey
19 the law, not because I had the Road to Damascus
20 jobbie -- and I would still to this day -- and it's my
21 defence -- I would still -- for example, at MBR, when
22 people have come, the Animal Rebellion people, and on
23 two occasions liberated five dogs and 20 dogs, well,
24 is it breaking the law? I thought it was, but I knew
25 there was an honest intent. But I still to this day --

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1 it warms my heart that other people do illegal actions
 2 but John Curtin stopped doing that a long time ago.
 3 When I said -- maybe we'll come to it in
 4 cross-examining -- and while I'm dealing with it --
 5 let's deal with it now -- that I do feel picked out --
 6 I was going to say -- use the term "victimised",
 7 "targeted" because of my history, because of my perhaps
 8 senior position, because I have -- outside the gates of
 9 MBR, I've happily used "leadership role" in this court,
 10 just for the sake of the court and the witnesses; more
 11 complicated than that, but some sort of senior role.
 12 And it's not because -- I feel the case against me
 13 I think was put not so much as what I did, more of who
 14 I am, really, and then putting an interpretation on
 15 that.

16 MR JUSTICE NICKLIN: What I've got from your
 17 cross-examination so far is, as I understand your case,
 18 you will ultimately submit to me that the impression
 19 that MBR Acres employees have of you is more to do with
 20 your past and their impression of what you've done than
 21 what you've actually been involved in doing outside the
 22 gates.

23 MR CURTIN: Yes, but if you notice, I didn't take away
 24 their -- I tried not to take away their feelings.

25 MR JUSTICE NICKLIN: I know that.

1 MR CURTIN: But I am someone who is passionate and I'm --
 2 you know, I've got Irish blood in me. I'm like
 3 a terrier. Once I get my teeth into something and I've
 4 done that here -- so I might be the most annoying person
 5 they see, the most person that's in their head and the
 6 loudest because I use the megaphone, but I think there's
 7 a cocktail of ingredients and circumstances that have
 8 led them -- for example, Employee V, when I put -- he'd
 9 be terrified of meeting me in Tesco's. That is not the
 10 person I am. It's wild. If I was to meet Employee V --
 11 I wouldn't want to get arrested, and 40 years standing,
 12 I'm not going to stand in Tesco's, "There he is, people.
 13 There's a worker". No, no, I leave that for the
 14 appropriate place of shouting, which is at the gates of
 15 MBR.

16 So I do have a history with the site. I was aware
 17 of the Daily Mirror article. Yes, I was aware of the
 18 Daily Mirror article when it came out. I was aware that
 19 the camp began. To be honest, I tried to keep away from
 20 it. I was like "Oh, no". One of the things I didn't
 21 want to go was to go -- was to muscle in on the, if
 22 I can call them, new kids on the block; "Okay, I'll take
 23 over now. I've been involved all this time, telling
 24 lots of Jackanory stories and -- I actually -- I didn't
 25 want to go there, and was a big demonstration early on,

1 at the very start of July, on a Friday, on a working
 2 day, and I didn't go to it deliberately, but I felt this
 3 sort of magnetic force pulling me and I went on the
 4 Saturday night, following the first live demonstration
 5 and I got stuck. I did -- I went on a Saturday night,
 6 thinking I was going to go and have a look and say
 7 "hello" to everyone and wish them luck, and that was 22
 8 months ago and I haven't really left since.

9 I took one look at what was going on and found it
 10 fascinating, and I could definitely sense lots of new
 11 people, lots of emotion, lots of excitement, lots of
 12 anger -- lots of anger towards the workers, which you've
 13 displayed [sic] -- I'll be cross-examined -- "Shame on
 14 you". I share that anger, but I would say there were
 15 people with far more -- that wanted to direct things at
 16 the workers.

17 Me, it's part of a campaign, but the way we're going
 18 to do this is very long, drawn-out -- if I may call it
 19 "unsexy techniques", petitioning parliament. And on my
 20 first -- I think I may have arrived on 12 July and
 21 I remember the first couple of incidents at the gate and
 22 I was -- I found it challenging myself, you know. The
 23 police were there. The police were always there at
 24 the -- and there were these flashpoints at the gate.
 25 But the camp, which I want to talk about, there's a lot

1 more than just the workers. We're there for the cup of
 2 tea, we fly the drone, we carry out surveillance and
 3 there's a whole team of other people. But I could
 4 definitely sense this twice-daily flashpoint and wanted
 5 to do something about it.

6 So I didn't know the people there. I didn't -- I'd
 7 never -- I don't think I'd met any of the people that
 8 were there. So I can remember conversations, for
 9 example, with the workers, "I'm not ..." -- individual
 10 people -- "I'm not going to let them in. I'm not going
 11 to let anything in. We're going to blockade the gates
 12 and we're going to keep a permanent blockade or we're
 13 not going to let them out. F them. Let them stay in
 14 all night". And I can empathise with that point of view
 15 as a demonstrator, but we live in the real world and
 16 even though the police -- the police were there on the
 17 daily demonstrations and I would say the police were --
 18 took a -- not soft, but a working relationship with the
 19 protestors; a not heavy-handed approach that you might
 20 expect perhaps in other parts of the country. Me
 21 personally, Liverpool or some -- the Met Police would
 22 have perhaps been a lot more harsh.

23 But people saying to me, "I ain't letting the
 24 workers out" or a number of people -- we used to have
 25 meetings. I helped to instigate meetings every single

1 day at the camp. We'll have meetings every day and we
 2 did have meetings every day in the first period. And,
 3 "What are we going to do then?", well -- and there would
 4 be a body of people, "Let's block the workers in".
 5 I said, "Well, if that's the road you want to go down,
 6 then there's such a thing as the police force and laws.
 7 If you make a stand here today to not let the workers
 8 out or not let the workers in -- if you don't let the
 9 workers in, that's an animal welfare problem, and if you
 10 want to keep the workers in all night, you might be able
 11 to do that for an hour, two hours, you might be able to
 12 do it for three hours or four hours, but at some point
 13 there will be a military industrial complex show of
 14 policing and those workers will be got out, you'll be
 15 arrested, you'll all be arrested and the camp is over".

16 So I took one look at it, you could say, and
 17 I was -- not for any moral reason -- my mind was
 18 immediately on longevity and staying within the law.
 19 I've been consistent with that. It's made me very
 20 unpopular with some certain sections because there's an
 21 example of me on the -- of some of the witnesses on
 22 I think September 15 -- August 15, when there was
 23 a large number of people, and you can hear me on the
 24 megaphone, screaming at people, "We're going to let the
 25 effing workers in", which is a strange thing perhaps to

1 hear from the demonstrators. Normally you would expect
 2 someone agitating the crowd, but, in my case, it was to
 3 cool the cocoa and -- for example, the police liaison
 4 officers, I immediately struck up relationships with any
 5 officers that were there and eventually -- it didn't
 6 take long -- police liaison officers were -- it was
 7 either police liaison officers or local police officers,
 8 and it something I used to get a lot of stick for
 9 because, being in activist circles, "Don't talk to the
 10 coppers, don't talk to the fascists", I knew -- I was
 11 relaxed about talking to the police. I wasn't going to
 12 be breaking any law. I had nothing to leak out in any
 13 conversations with the police because I wasn't -- I was
 14 going to go out of my way not to involve myself in
 15 anything illegal.

16 MR JUSTICE NICKLIN: Tell me about the discussions you've
 17 had with the police liaison. Have the police given you
 18 guidance about, for them, what they think -- what lines
 19 they think you shouldn't cross?

20 MR CURTIN: Yes. I mean, I could talk for a whole day, you
 21 know, about discussions every single day, up to the
 22 point -- let me give you an example.

23 MR JUSTICE NICKLIN: Yes.

24 MR CURTIN: Say the obstruction of the highway. Obstruction
 25 of the highway sounds simple enough. I won't deal with

1 it in the criminal element yet, but in the -- I mean in
 2 the civil. In the criminal terms, you think you block
 3 a road off on a protest with a banner, that's
 4 obstructing the highway. As my Lord knows and I know,
 5 being a protestor, it's actually -- you know, I could
 6 talk all day -- I could talk for a week actually. It's
 7 fascinating -- about obstruction of the highway.

8 MR JUSTICE NICKLIN: Obstruction of the highway, Mr Curtin,
 9 is possibly one of the most difficult areas of the law
 10 at the moment and there is no clarity in the law. You
 11 might think that in an area as important as what
 12 protestors can and can't do on the highway, we might
 13 need a bit more clarity but we don't have that at the
 14 moment.

15 MR CURTIN: Yes. I'd be talking to the police about some
 16 law from the 1850s about sheep, about hay lorries, about
 17 everyone's right to stop on a protest and park your car
 18 and unload and six minutes, 59 seconds, I remember as
 19 some limit to when it becomes ... So there was periods
 20 at Camp Beagle where -- it didn't last long, but that
 21 would be very early -- where the police would
 22 accommodate I think six minutes, 59 -- a blockage. That
 23 then went down and down and down and down, and by the
 24 time we get to September, near the injunction, we're on
 25 30 seconds and then it became a five-stage warning,

1 which can be done in ten seconds, "I'm asking you to
 2 move. If you don't move ...", but even then --
 3 MR JUSTICE NICKLIN: So at various points the police made
 4 clear to you what they regarded as being acceptable from
 5 their point of view and where they would intervene?

6 MR CURTIN: Yes. We're talking extensive -- to the point
 7 where -- and it's still to this point where I try to
 8 explain to the police liaison officers, "We talk that
 9 much that we need to talk a bit less. Can we keep this
 10 a bit more formal?", because it wouldn't be unusual for
 11 me to spend a quarter of an hour, half an hour. For
 12 example, there's lots of people who -- when I arrived
 13 the demos had already been going and this thing, this
 14 "Evil monsters", "Puppy killers", was already in
 15 operation.

16 So the police, I wouldn't go as far as even to say
 17 they were resigned to it, they were accepting of this
 18 situation and I felt my role in that one was to
 19 facilitate it and not have any criminal arrests, which
 20 would be -- definitely the agreement with the police was
 21 some obstruction, some obstruction but no blocking.
 22 Free passage with some -- they were accommodating and
 23 they didn't seem to mind what was said. Obviously if it
 24 turned into threat, I mean, "You effing ..." -- there
 25 was colourful language being used --

1 MR JUSTICE NICKLIN: How often did the police intervene
 2 about language?
 3 MR CURTIN: I think on the first day someone got called
 4 for calling the security guard "fat", something relating
 5 to ... so I did see the police arrest, and when it
 6 became personal -- and that's what I was able to say,
 7 and I still say it and I still ... it's like, "Don't
 8 make it personal". I had to share that with other
 9 people. For example, making remarks about people's
 10 personal appearances, it's definitely personal. You
 11 can't argue it's not. But they're all puppy killers,
 12 "Shame on you all".
 13 So when people -- I can understand -- and they've
 14 actually said they found it -- they take it personal.
 15 It's never personal for me and sharing that information
 16 with other people, that -- if you don't personalise it,
 17 you are allowed to express your opinion about the
 18 workers of MBR. If you know certain information,
 19 Employee A, be careful, even if it's true. Say you knew
 20 that someone worked in the -- we've heard the bleeding
 21 room, the procedure room. If you -- "There's the one
 22 that bleeds. That's the one", that's dodgy ground. So
 23 "You're all puppy killers".
 24 MR JUSTICE NICKLIN: Did the police ever suggest to you that
 25 what I'll call your protest messages, the repeated

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1 "Puppy killers", "Murderers", "Scum", "Get a different
 2 job", "How do you sleep at night?" -- did the police
 3 ever suggest to you that those protest slogans were in
 4 any way harassing?
 5 MR CURTIN: No, not that I remember. I was arrested for an
 6 offence that I went into with the last witness. The
 7 witness statements were --
 8 MR JUSTICE NICKLIN: It was a section 5, threatening words
 9 and behaviour, was it?
 10 MR CURTIN: Causing alarm, harassment and distress.
 11 MR JUSTICE NICKLIN: Yes, section 5, I think.
 12 MR CURTIN: And there was evidence in there that I'd used
 13 the word "moron" and I gave evidence and my point was
 14 it's moronic to work for this company. So the police
 15 seemed -- but there was the striking the car incident,
 16 where I was meant to hit the car, which ...
 17 But I have never been warned and I honestly
 18 haven't -- I don't remember -- because people there are
 19 clearly in an emotional -- some -- often people are in
 20 a very, very, very, very high emotional state,
 21 extremely -- you know, I've seen people wet themselves.
 22 MR JUSTICE NICKLIN: You're talking about protestors?
 23 MR CURTIN: Yes, I've seen protestors that frenzied and that
 24 full of emotion.
 25 MR JUSTICE NICKLIN: I've had that demonstrated to me by --

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1 well, Mr Maher is an example of somebody who has
 2 accepted to me, in his evidence earlier in the
 3 proceedings, that he finds himself overwhelmed by his
 4 emotions and he finds it difficult to control himself.
 5 MR CURTIN: Yes, many is the time I shook Mr Maher and asked
 6 him to get real, to discipline himself. So, yes, the
 7 talks with the police -- let me think if there are any
 8 other -- I'd be the go-to person.
 9 MR JUSTICE NICKLIN: What is the rank of the officer you
 10 would usually speak to?
 11 MR CURTIN: PCs.
 12 MR JUSTICE NICKLIN: Nobody higher than a PC?
 13 MR CURTIN: There's only been grade 2. I did ask one if he
 14 would be my witness, but it got complicated. I would
 15 have to write to the chief inspector for a summons.
 16 I am extremely -- far too friendly actually with the
 17 police liaison. I would say the general -- I tried to
 18 keep a positive -- on behalf of the camp, if I could say
 19 that -- a positive relationship with the police. I am
 20 constantly surrounded by people who take a different
 21 view of the police, a view that I once upon a time have
 22 held, yes, the police being the enemy and to never be
 23 talked to. That's -- I'm not interested in that.
 24 I know we're going to be here. Issues come all the
 25 time. For example, when I look at the videos now, the

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1 blocking people's pathway as they're coming out the
 2 gates -- hmm, I don't know when but after months --
 3 after September, October, I can remember this
 4 becoming -- coming to be dealt with as an issue by the
 5 highways and the police and there were some kind of
 6 moves that, "No, you can't stand there with your flag.
 7 You've got to move because the people are coming out".
 8 I'd be happy -- in that case it would be great
 9 because the police could perhaps say to me -- rather
 10 than the police having to go to move that person --
 11 because that person doesn't need to be -- there's no --
 12 there's nothing -- you don't need to hold your ground at
 13 that corner of the road. You can move, as long as you
 14 can be seen with the banner.
 15 I do -- I have to say this, while I'm talking, that
 16 I do find -- I'm used to a policeman's truncheon back in
 17 the day, when you were expressing your freedom of
 18 protest. I'm used to, like, "Yeah, pssht, get out the
 19 way". When I arrived this time round and I have kept --
 20 in all these 40 years I've kept my -- it's been
 21 a continual involvement of some form or another, but
 22 actually there's a thing called "Save demonstrations".
 23 They go outside slaughterhouses and they witness the
 24 trucks as they come past, and I did notice a real
 25 burning desire and need that "We will have our say", a

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1 real, real -- much, much stronger than mine.
 2 So a lot of times when I was negotiating the six
 3 minutes, 59, it was on behalf of other people.
 4 I didn't -- to me, two minutes, three minutes,
 5 30 seconds -- as long as we're there, because there's
 6 always other things to do as well. So I could get stuck
 7 on this, but that flashpoint was there and I would
 8 involve myself every day with it.
 9 In my defence on the civil part of it, I look at the
 10 video now and they can tell me now that two-thirds of
 11 that drive or half of that drive is their private
 12 property. That was not ever, ever brought up at the
 13 time. You can clearly see the action of the guards as
 14 like a force field, which was actually open to some --
 15 the police were very -- my evidence now, I'm telling
 16 you, the police were often very frustrated with the MBR
 17 guards for not having some more assertiveness at those
 18 gates. That's how it was. It was the security this
 19 side and you can see Mr Manning on one of the videos
 20 even saying something about -- to the police officer,
 21 "Tell him to stop touching the car". That's how it was.
 22 It was unquestioned.
 23 So the evidence will show that what we now know,
 24 I did used to protest on the drive on the understanding
 25 it was a drive, on the understanding it was part of the

1 public highway, not wanting to get arrested, so I -- the
 2 police liaison never brought it up, that, "At some point
 3 we think you should go over the road". That was never
 4 brought up until the injunction.
 5 I think the police have welcomed this injunction but
 6 the police could have dealt with it -- I was amazed at
 7 how liberal the police were, I must say. But good,
 8 we've got the Human Rights Act and people do have this
 9 right to protest. And the police were kind of delighted
 10 when the injunction came in and, remember, the original
 11 claimants -- the original injunction was to ban us
 12 a mile away and allow us to come back once a year as
 13 a demonstration -- to kindly allow us to go outside the
 14 gates --
 15 MR JUSTICE NICKLIN: Are you talking the Harlan injunction?
 16 MR CURTIN: No, no, the original injunction of this --
 17 MR JUSTICE NICKLIN: The one that was granted in August?
 18 MR CURTIN: Yes, the original claim, the original request
 19 was --
 20 MS BOLTON: Sorry, I'm nodding. I think you're talking
 21 about what was asked for, not what was --
 22 MR CURTIN: Yes, what was asked for. What was asked for
 23 was --
 24 MR JUSTICE NICKLIN: Well, they were trying to get a Harlan
 25 injunction again.

1 MR CURTIN: Yes. That didn't happen, but the police --
 2 I think this case is kind of interesting. I feel as if
 3 this injunction attempts to criminalise us and the
 4 police are more than happy for this court to do its job.
 5 I think if you look at those videos now -- and I've put
 6 it in my defence statement -- I accept that the box, the
 7 20-metre box -- I argued for it to be smaller -- has had
 8 a significant impact, and as part of my defence I will
 9 ask to be struck off as a named person. I have seen no
 10 justification. The only reason I think -- yes, I'll be
 11 asking to be struck off for a number of reasons. This
 12 persons unknown thing still stands and, if there is
 13 a box of any description, I've been compliant with --
 14 I've been compliant with any police instructions to me
 15 whilst protesting and I've been compliant -- tried to be
 16 compliant, attempted to be compliant within the
 17 injunction.
 18 But the fact remains that I will -- I'll have to --
 19 in my final submissions I'll be putting to you what my
 20 case is and what I ask from the court and what I ask for
 21 restrictions not to be put on the court [sic].
 22 I haven't finalised those yet but I don't think I've
 23 done anything to be punished in a punitive way.
 24 MR JUSTICE NICKLIN: That's not what the civil courts do.
 25 The civil courts aren't in the business of punishing

1 people. That's not ... they provide remedies for civil
 2 wrongs and those remedies, principally, are injunctions
 3 and damages and they're not seeking damages against you.
 4 So they're asking for a remedy of an injunction against
 5 you.
 6 Now, let me ask you this. We've looked a lot at the
 7 videos and, in the early days, before the injunction --
 8 and you've been quite candid about this -- the
 9 protestors that we can see on the videos have what you
 10 described as the "ritual", which is delaying the entry
 11 and exit of the employees each day so that you could
 12 confront them with your protest message. That was
 13 essentially the ritual.
 14 Now, the claimants say that they have a civil right
 15 or their employees have a civil right not to be
 16 obstructed when they go in and out of the Wyton site.
 17 Now, that appears to me to be one of the key issues that
 18 the claimants complain about. It's what led to the
 19 imposition of the exclusion zone because it was that
 20 which I was determined to prevent because it was that
 21 which was generating the flashpoint and the feelings of
 22 intimidation and harassment by the employees.
 23 Now, one point -- you don't have to answer it now,
 24 but ultimately one point that we're going to need to
 25 look at is the extent to which you say the law permits

1 you to delay people or obstruct vehicles going in and
 2 out of the Wyton site facility as an exercise of
 3 a protest right.
 4 MR CURTIN: It's not my case that I've got a God-given right
 5 but I've got a legal right to obstruct -- say, people
 6 that work at MBR, I haven't got a right to obstruct
 7 them -- well, I do have the right to protest and so
 8 there has to be something of a -- there has to be
 9 something of a balance in there. The right to
 10 protest -- and I'm proud to be addressing the court
 11 today about the right to protest, given what happened
 12 last Saturday. Perhaps the first time in Britain that
 13 a banner has been taken off people even before they held
 14 it. So the rights I hold as a protestor with genuine
 15 beliefs -- and as we've said, even if they weren't
 16 genuine, I've still got the right to protest -- there's
 17 a balancing act to be done.
 18 MR JUSTICE NICKLIN: The law would say you have the right to
 19 have your say and to protest. What you don't have the
 20 right to do is to make people listen to you.
 21 MR CURTIN: Yes.
 22 MR JUSTICE NICKLIN: And arguably the purpose behind
 23 obstructing the vehicles is to make the occupants of the
 24 various cars have to confront your protest message, as
 25 opposed to just driving past it.

25

1 MR CURTIN: Okay. If I may -- sorry.
 2 MR JUSTICE NICKLIN: You don't -- I mean, at the moment
 3 I don't think the law permits a protestor -- in the same
 4 way that nobody has the right to stop me in the street
 5 and prevent me from leaving and demand that I listen to
 6 what they want to protest about, just as much as I have
 7 the right to protest about something, those who are
 8 being protested about have the right to ignore it. They
 9 don't have to listen. Hand in hand with your freedom of
 10 expression is their freedom to ignore it and to pass on
 11 by.
 12 MR CURTIN: In my case I was kind of taking on some --
 13 I don't know how you would put it -- managerial role,
 14 knowing that other people felt much more strongly than
 15 me. I had a passing interest in how much those workers
 16 would see(?) us. I am -- myself, I am satisfied that
 17 standing across the road -- and the place is full of
 18 banners. We're Camp Beagle. No one could describe
 19 [sic] that we're there. I was acting on their behalf in
 20 a working way with the police, so I was acting -- I was
 21 negotiating on behalf of people that wanted to delay
 22 them for an hour, you know, and I was kind of putting
 23 that position to the police and then it was, "No, that's
 24 not going to happen".
 25 MR JUSTICE NICKLIN: So it's a product of compromise?

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1 MR CURTIN: Yes.
 2 MR JUSTICE NICKLIN: The ritual -- and I'll keep using that
 3 phrase because we know what we mean by that -- the
 4 ritual was a compromise between various elements of the
 5 protestors, some of whom wanted to do a great deal more?
 6 MR CURTIN: Absolutely.
 7 MR JUSTICE NICKLIN: So it was devised as a way of
 8 accommodating the various views, the differing views of
 9 protestors, as to what strategy should be adopted?
 10 MR CURTIN: Yes, and I definitely felt it was -- people felt
 11 powerless there and, by stopping a worker, it gave them
 12 some sense of "Ha-ha", some sense of control, and I was
 13 working with that control, so -- and this is my honest
 14 evidence and it's the truth and it's gone on day after
 15 day after day after day for 22 months. The injunction
 16 was a complete game-changer in relation to those -- how
 17 close you would get to the vehicles and another form of
 18 compromise.
 19 MR JUSTICE NICKLIN: Talk to me about the different
 20 protestors because you've made the point in your
 21 questioning of various MBR workers that they use the
 22 label "protestors" to apply to everybody and I detect
 23 from your questioning -- and what you've said to me in
 24 your recent answers tends to reinforce that message --
 25 that there is a broad spectrum of people who are

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1 protesting, some of whom wish to do more by way of
 2 direct action and others of whom -- well, you describe
 3 to me. Describe to me, as it were, the least or the
 4 most passive protestors that there are at the camp,
 5 going through to -- don't name them but going through to
 6 people who may be wanting to use more forceful methods
 7 of protest.
 8 MR CURTIN: Yes. To be honest, I think looks and age can be
 9 deceptive. I'd say Camp Beagle has got one of the
 10 biggest ranges -- it would have to -- of a particular
 11 campaign that I've ever known because -- I call it the
 12 "puppy factor". We're dealing with -- it's why I say
 13 "Puppy killer". It's emotive by its nature. We're on
 14 the side of the road, we are literally -- we have
 15 a rule. No one is excluded. Anyone is welcome. For
 16 example, we have a vegan kitchen. But from day one,
 17 when I arrived, I could sense this puppy factor and
 18 I wanted to hold on to this puppy factor, so you won't
 19 see anything about veganism, you won't see anything
 20 about hunting, you won't see anything about any other
 21 cruelty issue apart from animal experiments on our side.
 22 So it was to put the word out to dog lovers,
 23 Yorkshire terrier lovers, and on the basis of that -- be
 24 careful what you wish for -- we get the great and the
 25 good and the mad, the bad and the sad, Mr Average and

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1 punk—rockers, old age pensioners, with sometimes very
 2 little common denominator except we like puppies. So
 3 nearly all the people, I would say very, very, very
 4 inexperienced. Most of the people are from the
 5 locality. People have lived there for ten and 20 and
 6 30 years and not known about this place, so they're
 7 hopping mad by its nature. So a broad range of people.
 8 What we lost quite early on was I could say the more
 9 militant balaclava—y, masking up — a militant section.
 10 There's been a bit of a clash with that at Camp Beagle
 11 because we're out and out law—abiding, talk to the
 12 police, actually asking people, "Don't ..." — I never
 13 tell people what to do, but time and time again, if
 14 I saw someone — you mentioned a person animated and
 15 I'm, "Don't — try not to kick the car, the mirror" —
 16 what are they called? — "the side mirror. I know you
 17 want to, but don't". So I really, really, really,
 18 really — people come out of the woodwork, old
 19 campaigners, because vivisection has not been really on
 20 the agenda for like 15 years. It went off.
 21 So a massive cross — impossible. Puppy — having
 22 an affection for puppies as opposed to animal rights
 23 extremists — most of the people have never been on
 24 a demonstration before and they — especially in the
 25 early days, I called it the "Narnia Tellytubby

1 Republic", Camp Beagle. They were excited, they were
 2 having some — people were doing something and it felt
 3 like it was going to be easy and they were going to shut
 4 down the place.
 5 That was from the inexperienced brand of people
 6 who — it was their first campaign and they were in at
 7 the deep end, like on the day the van — the first lot
 8 of vans went out, there were hundreds of police and
 9 helicopters, and this gave these people, who had never
 10 witnessed these things before, a real sense of purpose
 11 and power. So a massive cross—section of people and the
 12 vast majority —
 13 MR JUSTICE NICKLIN: Does that reflect how they express
 14 themselves in their protest activities? Are some people
 15 more passive? Do some people just hold placards or just
 16 stand by or just support others? Do others limit
 17 themselves by holding placards? Do some people engage
 18 in the shouting? Other people want to do more than
 19 that? In other words, there's not one protestor?
 20 MR CURTIN: No.
 21 MR JUSTICE NICKLIN: You don't all do the same things.
 22 MR CURTIN: Yes. For what it's worth, when I arrived, I had
 23 this idea of, like, let's keep it going, let's ... what
 24 I thought was going to happen was that it was going to
 25 become like a hotbed for militant activities and that

1 was going to be the way the camp went. But that's not
 2 the way it went, and if there were people who wanted to
 3 use the camp for that reason, there was a divide, you
 4 could say, and the camp was seen as — the softies and
 5 the wussies, we were preventing other people from —
 6 like what you won't see, those — between the early days
 7 is "We're going to shut it down". Yes, we talked about
 8 closing it, but, "This is the van, this is the one, this
 9 is the ..." — so arranging big exciting spectacles.
 10 When we did arrange days, it was a real, real hot,
 11 sweaty task of trying to get these people and asking
 12 them, "Look, you're coming to our space. This isn't
 13 going to be a free—for—all", I even say it on one of the
 14 videos, "Please ..." — and, of course, if people wanted
 15 to come and do what they were going to do at night—time,
 16 that was their business.
 17 I thought there was going to be a lot of that. When
 18 I first arrived, that's what I looked and thought, "Oh,
 19 my God, we're outside this place. 30 years ago I used
 20 to crawl on my hands and knees every night for months
 21 and months in the hedge and here we are in tents, having
 22 a cup of tea". But that's not what happened. The
 23 militant — for what it's — I'm giving evidence — the
 24 militant block of the animal rights movement, it's kind
 25 of gone away and what's left is a rump of people who

1 I would say are living in some nostalgic era. Now we
 2 have all these new techniques, DNA, cameras, so to carry
 3 out this militant revolution, it's a fantasy that
 4 I wanted nothing — no part of it. As a result of that,
 5 the camp has got this reputation for being grasses and
 6 police informers and being ultra—mild and liberal and
 7 we've prevented MBR being shut down by our tactics.
 8 So a massive — I can't explain to you — please
 9 curb me on the time because I could talk about the
 10 people all day. But definitely someone who a year
 11 before — we've got one classic guy. He loves — "Oh,
 12 my God, this time last year, who knew they'd have
 13 a camper van". I used to get my Daily Mail every day
 14 and I used to believe everything about the
 15 pharmaceuticals and I used to trust the police and it's
 16 been an incredible experience for me.
 17 So being at the side of the road is the key. We go
 18 out of our way. Say if someone arrived and they are
 19 very challenging and they're a handful, we try not to
 20 kick them out. But, for example, racist comments, I've
 21 heard — in the time I was there I've heard — I was
 22 going to say three, I think maybe four racist comments;
 23 for example, the guards are all of a Pakistani origin
 24 and it's been such a — not massive effort, but it's
 25 been an effort to make sure that that doesn't become an

1 issue. And when I have heard people say racist things
2 to the guards because -- I'm on it like a tonne of
3 bricks, and that would go with homophobic comments as
4 well.

5 So, yes, it's been such hard work because it wasn't
6 planned -- it was not planned. If it had been planned,
7 then you can have a committee and you can have
8 strategies and you can have things that we're not going
9 to do or -- it's been a spontaneous, organic, crazy,
10 crazy project that's been difficult, it's been trying to
11 herd cats, but somehow it's still going today. Does
12 that give some ...?

13 MR JUSTICE NICKLIN: Hmm--hmm.

14 MR CURTIN: So I would draw attention to all the great
15 things the camp has done. Even with -- some of the
16 witnesses talked about, "They shouldn't even be allowed
17 to camp there. They should be allowed to protest but
18 silently". The case against me and I could say against
19 the camp, even though -- it's is not that the camp is at
20 issue here. We're not -- this isn't a movement -- it
21 was, to try to get rid of us, but now they've accepted
22 the camp is there and good. And long may the camp stay
23 there and I hope it does remain.

24 Yes, so all the great things. But for me, the most
25 important thing -- and I talk about it a lot -- is we're

1 physically there. It's a physical thing. In this day
2 and age of social media, it's a physical entity. And
3 the support has incrementally increased --

4 MR JUSTICE NICKLIN: Tell me about your social media
5 activities.

6 MR CURTIN: Okay. I used to give talks prior to Camp Beagle
7 where I would tell people, "Put down your bloody phone".
8 I would criticise -- I couldn't believe that there were
9 people -- whole generations of people who were spending
10 their life on the phone. I am now one of those people.
11 So --

12 MR JUSTICE NICKLIN: Because you recognise that it has
13 a power to communicate the message?

14 MR CURTIN: Yes, with problems. As a way of -- a form of
15 communication, I like something that I heard on Radio 4
16 a long time ago: a calibre of what you see on social
17 media is kind of like what you see scrawled on the back
18 of a public toilet. But we wouldn't be there -- the
19 daily means we used to have, it would be my case of we
20 are not going to be answerable to social media. We're
21 here in the real world, we will put things out to social
22 media and we must not let social media tell us what to
23 do. That's been a very difficult challenge.

24 But, when I arrived, I think there was already
25 a Facebook -- Camp Beagle Facebook. Because I had an

1 allergy to Facebook, I couldn't believe it existed and
2 I wanted nothing to do with it, and the people -- one
3 thing about Camp Beagle -- and you might have noticed
4 it -- do you know the -- and I've mentioned it
5 earlier -- the Life of Brian film, with the People's
6 Judean Front -- the Judean People's Front, split as --
7 it's been -- I call the camp -- as far as people, it's
8 like the Christmas Eastenders edition on a loop every
9 day. Constant politics.

10 And the camp, the social media, it was -- I had
11 nothing to do with it when it was set up. I used to
12 look at it and despair, but I didn't take a -- I had
13 no -- I didn't really get involved with the -- as time
14 went on I got involved, but I think by the time -- so it
15 began at the very end of June/start of July. By the
16 time -- I would imagine maybe while we're getting
17 to August and September, I'm begrudgingly having
18 a hands-on role, for things like "Stop putting ..." --
19 I remember our neighbour is a farmer and he's in
20 dispute, he produces oat milk, and I went away for one
21 day and while I was away, the front page of Camp Beagle
22 became like a vegan page, which I didn't want, and it
23 became -- they chose to pick the side of the adversary
24 of our neighbour in court. I was like, "He's our
25 neighbour". So I got dragged into the social media

1 reluctantly, but after the first three months I've
2 always tried to have an input.

3 MR JUSTICE NICKLIN: Let's talk about a specific. So you
4 have the witness who came along that you had filmed
5 while he was trying to fix the fence.

6 MR CURTIN: Yes.

7 MR JUSTICE NICKLIN: Now, talk to me about what your purpose
8 was in doing that.

9 MR CURTIN: Okay. If I can tie it up with -- so I get
10 dragged into it and then -- okay, and I wish I was the
11 leader of Camp Beagle because then people would do what
12 I say, but I wouldn't want to be round people who just
13 obeyed me anyway. But everything's a challenge. And
14 what I would say -- and this is my evidence. I have
15 done campaigning for 40 years but for some reason, if
16 I was going to start making tables and there was
17 a carpenter over there that had spent 40 years, I'd be
18 interested in listening to the carpenter. In this day
19 and age, everyone has got their own little bubble,
20 "Don't tell me what to do". I find it incredibly
21 challenging.

22 Sorry to not answer your question, but things like
23 the highways man, there's been lots of etiquette and
24 things with him. Things like, "Don't put banners on the
25 road barriers" -- the amount of times I've -- someone

1 has put it on the barrier, and I've gone, "No, no, we
 2 don't do that"; "But I want to put it here and it looks
 3 good"; "It's about the only place here we can't"; "We'll
 4 have to talk about it at the meeting"; "Why?"; "No, you
 5 can't. We'll get kicked off if you do this".
 6 So social media I got dragged into, so by the time
 7 Employee V --- I am an editor on Facebook. That gives me
 8 ability to do some editing and have a creative purpose.
 9 We've also got an Instagram and we've got a Twitter.
 10 It's incredibly fluid, the organisation of the camp, so
 11 fluid, heartbreakingly fluid. I've been a constant,
 12 I would say, throughout, so --- and I --- if I'm shown
 13 challenging Facebook articles or something, then since
 14 September of 2021 I have had some input --- never like an
 15 editor, full control, but an input.
 16 So Employee V, our job --- one of our jobs on social
 17 media and how we put it out there --- I actually say it
 18 all the time --- and it allows me to perhaps address some
 19 issues that might be spicy; for example, at the moment
 20 there's a banner at the front and it gets painted on
 21 sometimes. I mean, that's an example --- offensive
 22 language on it, like --- forgive the court, but
 23 I remember I woke up one morning, "Shitshow cunts" was
 24 on the banner. Forgive my language.
 25 MR JUSTICE NICKLIN: Whose banner?

1 MR CURTIN: An MBR banner.
 2 MR JUSTICE NICKLIN: Because after the injunction I think
 3 MBR put up a banner on the gates.
 4 MR CURTIN: Yes, and if it was an organised campaign, it
 5 would be like "Oh, no". I can't go over and take it
 6 anyway, but of all the things to write, so ---
 7 MR JUSTICE NICKLIN: Sorry, to drag you back to the --- it's
 8 quite important to me that you tell me in your own words
 9 what was your motivation behind filming the employee who
 10 was fixing the fence. What were you hoping to achieve
 11 by that?
 12 MR CURTIN: What I was hoping to achieve --- what I set out
 13 to do every day I'm there is to just tell the world ---
 14 tell people what --- be a journalist really --- a biased
 15 one, but a journalist who described, "This happened
 16 today, this truck came in today". So it's very --- I say
 17 "very rare". I think that occasion --- apart from some
 18 security guards coming over to the road, I think that
 19 was the only occasion I've ever seen a worker on this
 20 side of the fence. So by it being unusual, I cannot
 21 remember but I saw him going or someone shouted. So
 22 I put the camera on, I'm going to do a livestream, which
 23 I do regularly anyway, but that livestream I imagine
 24 would have been because it's a worker. Let's see what
 25 happens next. A worker is on the outside of the fence,

1 remarkable. I'm addressing the audience the whole time.
 2 It's them I'm addressing. That's it. There's a man
 3 outside the fence putting some strands of barbed wire
 4 there --- yes, just to say it how it is and try --- yes,
 5 just to say how it is. Just journalistic.
 6 MR JUSTICE NICKLIN: Okay. Well, it's time --- we're almost
 7 at the time for the break and I think it's been helpful
 8 for you to talk to me about those issues. Are there any
 9 others that you wanted to raise with me?
 10 MR CURTIN: Let me have a look. (Reads to self).
 11 Bantin & Kingman I want to talk to you about, that
 12 part of the evidence. Basically, in my terms, who,
 13 what? No evidence has been put about ---
 14 MR JUSTICE NICKLIN: Yes, your ultimate point will be there
 15 isn't a sufficient threat to justify an injunction
 16 against --- that protects the other site?
 17 MR CURTIN: In my case, that's why --- persons unknown ---
 18 MR JUSTICE NICKLIN: You don't need to worry about persons
 19 unknown.
 20 MR CURTIN: Me, personally, I've got no ---
 21 MR JUSTICE NICKLIN: Have you even been to the site?
 22 MR CURTIN: No, and I've got no intention of going. Even as
 23 an MBR --- Camp Beagle, I've got no desire.
 24 Night-time security, the added security, it's part
 25 of the evidence, Susan Pressick's, kind of what's that

1 got to do with me? Take it up with the Animal Rebellion
 2 people.
 3 MR JUSTICE NICKLIN: Yes, it's your point that not all
 4 protestors are the same.
 5 MR CURTIN: Far from it.
 6 MR JUSTICE NICKLIN: Your point is you're not answerable for
 7 those people who target or use direct action and break
 8 the law. You're only answerable for what you have done.
 9 MR CURTIN: Yes.
 10 MR JUSTICE NICKLIN: Yes.
 11 MR CURTIN: I think I've raised most of those points. If we
 12 have a break, I'll think some more and then ---
 13 MR JUSTICE NICKLIN: We'll have a break and then you can go
 14 in the witness box. Don't worry, there's plenty ---
 15 I mean, Ms Bolton will be doing a thorough job of
 16 cross-examining you so I suspect any of the issues that
 17 were really important, she's likely to address in the
 18 cross-examination so I suspect you'll have an
 19 opportunity to answer any particular points that she
 20 wants to challenge you on; all right?
 21 MR CURTIN: Yes.
 22 MR JUSTICE NICKLIN: So the process isn't complete yet, and
 23 even when she's finished, if there's something that
 24 she's asked you about that has provoked in your memory
 25 something you want to tell me, then I'll let you keep

1 a note in the witness box and you can --- when she's
 2 finished cross-examining, you can say, "Ms Bolton asked
 3 me about this. I'd just like to mention this"; all
 4 right?
 5 MR CURTIN: Okay.
 6 MR JUSTICE NICKLIN: So that process is fine.
 7 MR CURTIN: Okay.
 8 MR JUSTICE NICKLIN: Right. We'll come back at midday.
 9 (11.44 am)
 10 (A short break)
 11 (12.00 pm)
 12 MR JUSTICE NICKLIN: Right.
 13 MR CURTIN: I think if I can address --- I've got two points
 14 here, but I think it's the same point really and then
 15 I'll take to the witness box. Can I be allowed to
 16 address the court --- because I'm not cross-examining
 17 myself --- after the questions?
 18 MR JUSTICE NICKLIN: Yes --- well, subject to my being
 19 satisfied that what you're telling me is relevant, yes.
 20 MR CURTIN: I've got here a project licence. Last night
 21 I submitted some evidence and one of the pieces of
 22 evidence was in that project licence there was no
 23 mucking about with the words, "The dogs will be killed".
 24 I think even my Lord --- because of the --- I think the
 25 way MBR, through their solicitors, have presented the

1 claim, I think they've had an eye on propaganda and
 2 they've used a propaganda speech to sort of put some
 3 glitter on every single last thing, but to me this is
 4 about killing dogs and killing puppies and that's what
 5 happened. All those dogs are on death row. I know it's
 6 not part of the evidence and you've stopped that channel
 7 from happening ---
 8 MR JUSTICE NICKLIN: But you understand why I've done that,
 9 don't you, Mr Curtin?
 10 MR CURTIN: Yes, on a legal basis. And it's of some relief
 11 to me actually because I felt, part of my overwhelming,
 12 "Oh, my God" --- I can talk about vivisection, I can
 13 address, but me, battling with scientific papers in
 14 a courtroom --- so I'm kind of relieved it hasn't gone
 15 that way.
 16 Right, so I'm ready to go in the box and then if
 17 I can address the court afterwards.
 18 MR JUSTICE NICKLIN: Okay. Take your place.
 19 MR CURTIN: Can someone take notes?
 20 MR JUSTICE NICKLIN: You can sit there and then you have
 21 a proper place to rest to make notes on; all right?
 22 Do you need more paper?
 23 MR CURTIN: No.
 24 MR JUSTICE NICKLIN: Don't forget you'll get the transcript
 25 as well.

1 MR JOHN CURTIN (affirmed)
 2 MR JUSTICE NICKLIN: Mr Curtin, you can sit down if you want
 3 during your evidence, as you wish.
 4 Now, first, formally, you've provided in the
 5 litigation your original defence and you've provided to
 6 the court, shortly before the trial, your witness
 7 statement.
 8 A. Yes.
 9 MR JUSTICE NICKLIN: Do we have those anywhere to hand,
 10 Ms Bolton?
 11 MS BOLTON: My Lord, apologies.
 12 MR JUSTICE NICKLIN: Do we have Mr Curtin's witness
 13 statement anywhere to hand so he can formally confirm
 14 it? Has it made its way into any of the bundles?
 15 MS BOLTON: It should be in the box in front of him. It's
 16 open on the right page, Mr Curtin, in the bundle.
 17 A. Excellent, yes. I read it last night and I confirm this
 18 is my statement.
 19 MR JUSTICE NICKLIN: All right. And just for the
 20 purposes --- because this morning you were strictly
 21 making submissions to me, but in what you said --- part
 22 of what you said at least was capable of being
 23 evidence --- are you happy to confirm that what you've
 24 told me this morning is true to the best of your
 25 knowledge and belief?

1 A. Absolutely, yes.
 2 MR JUSTICE NICKLIN: All right. Wait there then and
 3 Ms Bolton will have some questions.
 4 Cross-examination by MS BOLTON
 5 MS BOLTON: Mr Curtin, I'd like to explore a number of
 6 topics with you. I want to look at some of the points
 7 you've advanced in your defence statement first and your
 8 witness statement and through evidence that you've
 9 adduced whilst you've been cross-examining some of the
 10 claimants' witnesses. I then want to look at the
 11 specific allegations that the claimant has made which
 12 concern the trespass on the claimants' land, the
 13 interference with the common law right to access the
 14 highway, obstruction of the highway and harassment.
 15 That's the way we're going to go through this. I'm
 16 going to take it date incident by date incident because
 17 I think, if I do it issue by issue or cause of action by
 18 cause of action, we'll be looking at the same videos
 19 many times ---
 20 A. Yes.
 21 Q. --- and we'll probably not --- as your witness statement
 22 was fairly limited, we're probably going to look at it
 23 from the video evidence and those incidents that are
 24 relied upon by the claimant mainly, rather than
 25 paragraph by paragraph of the witness statement; okay?

1 A. Yes.
 2 MS BOLTON: My Lord, before we go any further, Mr Curtin
 3 indicated to you earlier on that we'd had a discussion
 4 about some of the convictions that have come out during
 5 the course of the hearing so far. Your Lordship
 6 indicated about the need for permission. There are two
 7 convictions which Mr Curtin has asked our witnesses
 8 about, both of which he's highlighted again today. I do
 9 ask for permission to deal with those very briefly
 10 because they have been put to our witnesses and they are
 11 of relevance on the questions that were asked. They
 12 won't take me very long. I don't intend to go to
 13 anything that hasn't been raised.
 14 MR JUSTICE NICKLIN: Right. You've discussed this with
 15 Mr Curtin?
 16 MS BOLTON: I indicated to Mr Curtin -- because he asked me
 17 if he's going to raise them and I said that things that
 18 he's put to our witnesses I will raise but I won't be
 19 raising anything else. I think that's why he wanted to
 20 know whether he should canvass it with you this morning.
 21 MR JUSTICE NICKLIN: Are you happy with that?
 22 A. I'm happy -- not happy. There's a conviction that
 23 happened 40 years ago that I've spent my life --
 24 I did it as part of the animal liberation movement.
 25 MR JUSTICE NICKLIN: Can I use shorthand, which is: is that

1 the grave incident?
 2 A. Yes, and I haven't put it to the witnesses.
 3 MR JUSTICE NICKLIN: Now, just hang on a minute. Mr Curtin
 4 has put this as a question to the witnesses on the basis
 5 of what they believe or understand the position to be.
 6 Why is it relevant to establish what is actually the
 7 position?
 8 MS BOLTON: Well, my Lord, from the point of view it's been
 9 put to the witnesses that it's a matter of gossip rather
 10 than fact --
 11 MR JUSTICE NICKLIN: Okay.
 12 MS BOLTON: -- and that's not the case. So we were going
 13 to --
 14 MR JUSTICE NICKLIN: Well, none of these witnesses said they
 15 knew anything about it other than the fact they were
 16 aware of the allegation.
 17 MS BOLTON: My Lord, Employee H gave detailed evidence that
 18 she knew all about it and what had happened and how.
 19 MR JUSTICE NICKLIN: Okay. Then I'll take that into account
 20 about what she believes the position to be. Why is it
 21 necessary to go, in open court, through details of what
 22 now are very stale convictions?
 23 MS BOLTON: My Lord, I simply make the point that it was put
 24 to the witnesses that it was gossip rather than fact.
 25 That was why we were going to cover it. It wasn't our

1 intention to cover it before that information was put to
 2 the witnesses.
 3 The second incident, my Lord, concerns the Wyton
 4 site itself --
 5 MR JUSTICE NICKLIN: Yes.
 6 MS BOLTON: -- and that is relevant, we would say.
 7 MR JUSTICE NICKLIN: Yes, it is.
 8 MS BOLTON: I would like to ask --
 9 MR JUSTICE NICKLIN: Yes, you can ask questions about that.
 10 You can't ask questions about the first. That's a stale
 11 conviction that, for the reasons I canvassed with you in
 12 argument, doesn't appear to me to be relevant. It is
 13 relevant to the extent that -- and it's part of
 14 Mr Curtin's case -- that the employees' approach to him
 15 and what they think he's capable of has largely been
 16 informed by what they understand about his past. That's
 17 a question of subjective belief.
 18 Proving the objective truth of any of those matters
 19 is not relevant, so you can have, for what it's worth,
 20 the evidence the employees have given in relation to
 21 what they understand Mr Curtin's past to include, but we
 22 don't need to go into the matter as a matter of fairness
 23 to the witness because he is entitled to have that
 24 conviction rehabilitated and it must be necessary and
 25 relevant to an issue that I have to decide before

1 I would allow questions on something like that. So you
 2 can't ask questions about the earlier of those two
 3 convictions; you can ask questions about the Wyton site
 4 incident.
 5 MS BOLTON: My Lord, I'm grateful for the indication.
 6 A. I know it's not my job to -- if I can add, seeing as
 7 it's in court. For me, this would have been especially
 8 interesting -- especially important if there was
 9 a journalist because it does -- there's something in my
 10 past which I'm not going to talk about, which I'm forced
 11 to talk about because it's very controversial --
 12 MR JUSTICE NICKLIN: No, Mr Curtin, the law gives you the
 13 entitlement to be rehabilitated. It's an important
 14 right. It's a dimension of your Article 8 rights as an
 15 individual citizen, which is the right eventually to be
 16 rehabilitated and not to be constantly confronted with
 17 things that you did many years ago. You don't need to
 18 say anything more on it.
 19 A. I would like to say one more sentence, just as --
 20 I would like to --
 21 MR JUSTICE NICKLIN: Be careful what you say because I'm
 22 doing my best to protect that aspect of your life. Be
 23 very careful what you say about it.
 24 A. I will. It's more that -- I just want to say as
 25 a statement of fact that there was an act of

1 grave—digging which took place 15/20 years ago for which
 2 I was a suspect. I was arrested for it. There was no
 3 evidence and, on the contrary, I absolutely bitterly ,
 4 bitterly condemned it.
 5 MR JUSTICE NICKLIN: Fine. You're not going to be asked any
 6 questions about that.
 7 A. Good.
 8 MR JUSTICE NICKLIN: Right. Carry on.
 9 MS BOLTON: My Lord.
 10 Mr Curtin, you provided some time ago now a defence
 11 statement with a statement of truth. You'll find that
 12 in your bundle at page 63.
 13 A. Okay.
 14 MR JUSTICE NICKLIN: It's in volume 1, folder 1, tab 2.
 15 MS BOLTON: I think Opus have the wrong bundle at the
 16 moment. Can we have Mr Curtin's bundle, please?
 17 A. I've got it .
 18 Q. I think we're still in the wrong bundle.
 19 A. I have my statement —
 20 MR JUSTICE NICKLIN: Don't worry, not you. You're in the
 21 right bundle.
 22 THE EPE OPERATOR: I have one that's "D11 evidence
 23 bundle" and one "Trial bundle D11 evidence".
 24 MS BOLTON: "Trial bundle D11".
 25 If we can go to the fourth paragraph from the bottom

1 of the statement, please —
 2 A. Yes.
 3 Q. — you'll see it starts with the words, "I am offering
 4 ...".
 5 A. I am looking at my defence statement?
 6 Q. Yes. And it's on page — it's on the second page of
 7 your defence statement.
 8 A. Ah, yes.
 9 Q. You'll see the words:
 10 "I am offering to accept ..."
 11 A. Yes.
 12 Q. Right. And you said in your defence statement:
 13 "I am offering to accept the terms and conditions of
 14 this injunction as it stands ..."
 15 A. Yes.
 16 Q. "I feel that they strike a correct balance between the
 17 right to protest and those we protest against."
 18 A. Yes.
 19 Q. But in fact you've not been prepared to settle the
 20 proceedings on that basis, have you?
 21 A. I chose not to when the actual choice came and I can
 22 explain why.
 23 Q. And it's right, isn't it — to use your words earlier in
 24 these proceedings, when you've been cross—examining the
 25 witnesses, you hoped that this would be an opportunity

1 to put vivisection on trial?
 2 A. Yes, I'm — that — I'm here to defend my right to
 3 protest and, while I'm doing it, I might as well do some
 4 protesting while I'm here.
 5 Q. You also say in paragraph 5 of your statement — if we
 6 can go to the first page, please, would you count down
 7 five paragraphs, please?
 8 A. Yes.
 9 Q. You suggest that you offered an undertaking at the
 10 earliest stage at the preliminary hearing.
 11 A. Yes.
 12 Q. Which hearing are you referring to?
 13 A. I think the hearings began in around September,
 14 did they?
 15 Q. Are you talking about —
 16 A. Not — it wasn't the first couple of hearings. It's as
 17 the case went on, so I don't know but many months after
 18 the injunction began, I'd say.
 19 Q. So after the injunction began?
 20 A. Yes.
 21 Q. Okay. So not at the earliest stage?
 22 A. At the earliest stage there were a number of conditions
 23 which I can't remember. I think we either signed up to
 24 them or we had to agree to them anyway, but they
 25 seemed — I remember there being some conditions and

1 I cannot remember now whether I was going to adhere to
 2 any conditions that were put on us.
 3 Q. So, just to be clear, you're not talking about at the
 4 time the injunction order was made by Mrs Justice Stacey
 5 at the beginning of these proceedings?
 6 A. No, there was no — it was not in my head then to
 7 voluntarily do some undertakings.
 8 Q. And when did you communicate this offer to the
 9 claimants' solicitors ?
 10 A. Through this statement. I don't think I did contact
 11 the — I don't know if I did. I'm not a paperwork
 12 person. I believed that this piece of paper might
 13 suffice. I may have written a letter to your
 14 solicitors. I can't remember doing so and, if I did,
 15 then I did. But I thought this was doing the job.
 16 Q. Help me with this, Mr Curtin, because you're saying in
 17 your defence, in the document we're looking at, that at
 18 the earliest opportunity in the proceedings you offered
 19 undertakings.
 20 A. Yes — I was prepared to, yes, and I did offer them,
 21 yes.
 22 Q. I want to clarify this because the claimants are not
 23 aware of receiving any offer of undertakings from you in
 24 these proceedings at all .
 25 A. Yes.

1 Q. That's right, isn't it?
 2 A. When I wrote this, I may not have filled out the proper
 3 form or gone through the legal etiquette. It was --
 4 when I said I was prepared to accept the undertakings,
 5 I may have not gone through the formal lengths, but
 6 I've said in open court I discussed the possibility of
 7 the undertakings and I wanted to see if there was some
 8 sort of -- if we can call it "a deal" available, and not
 9 just on my behalf. Remember, it's very important,
 10 collectively .
 11 Q. So would you agree with me that you've never, either in
 12 writing or in open court, made a formal offer saying,
 13 "I'm prepared to undertake not to do this in settlement
 14 of these proceedings"?
 15 A. I would be in the judge's hands to know if I'd answered
 16 that correctly. By standing up and saying, "We can
 17 finish this today", perhaps by all of us doing an
 18 undertaking along those words -- I was minded at some
 19 point, for reasons you haven't asked me yet, of why
 20 I was so keen on the undertakings. But, no, I'm
 21 prepared to accept, if you say so and the judge doesn't
 22 dispute it, that I haven't made the formal document.
 23 Q. Well, it's more than not the formal document, isn't it?
 24 There has not been any formal offer of, "I will
 25 undertake not to do these things now".

1 A. By standing in the court and saying it and encouraging
 2 a debate about an undertaking, that's the role -- that's
 3 what I did and, whether I did it formally or not, I ...
 4 Q. So you would accept nothing formal was advanced?
 5 A. This was about as formal as I get.
 6 Q. So in your defence statement would have been the first
 7 time that you formally --
 8 A. Yes.
 9 Q. -- offered an undertaking --
 10 A. Yes.
 11 Q. -- which subsequently you've not been prepared to settle
 12 on that basis?
 13 A. I've chosen not to.
 14 Q. Yes.
 15 A. If you want the reasons, I can give them to you.
 16 Q. No, I don't need your reasons. I just wanted to clarify
 17 your position to make sure we understood.
 18 MR JUSTICE NICKLIN: Well, make a note. That's one of the
 19 things you want to make a note of because, if you want
 20 to tell me about that later, you can do.
 21 A. Okay. Thank you.
 22 MR JUSTICE NICKLIN: Yes.
 23 MS BOLTON: Now, have you still got your statement in front
 24 of you?
 25 A. Yes, I have 25 May 2022.

1 Q. No, that's your defence. So you've also got your
 2 witness statement?
 3 A. Yes.
 4 Q. Now, in paragraph 3 --
 5 MR JUSTICE NICKLIN: Do you have that, Mr Curtin?
 6 A. Pardon?
 7 MR JUSTICE NICKLIN: Do you have your witness statement?
 8 A. Yes.
 9 MS BOLTON: You've confirmed in paragraph 3 that you've been
 10 protesting outside the gates of the first claimant's
 11 property since July 2021.
 12 A. Yes.
 13 Q. You've described yourself throughout these
 14 proceedings -- well, sorry, throughout this hearing as
 15 somebody who has been an unofficial marshal?
 16 A. Yes.
 17 Q. An unofficial police liaison officer?
 18 A. Yes.
 19 Q. Would it be fair to say that you've portrayed yourself
 20 as someone trying to facilitate and encourage lawful
 21 protest at the site?
 22 A. Yes, striking a balance between all the energies, yes.
 23 Yes.
 24 Q. And someone who has tried to facilitate access to and
 25 from the site for the MBR staff?

1 A. But not -- until the injunction, not absolute free
 2 passage. Absolute, as if we weren't there, no, but,
 3 yes, the free passage of vehicles in and out, of the
 4 workers' vehicles.
 5 Q. What about your position since the injunction?
 6 A. I've just complied -- seeing as it's been -- it's made
 7 it easy for my brain cells, I've just complied with the
 8 orders of the injunction. So since the injunction,
 9 I have endeavoured -- I've set out, considering how
 10 often I'm there and how many incidents I go through --
 11 I have tried to comply.
 12 Q. Would you say that -- have I understood your evidence to
 13 be that you would -- because you said you hadn't tried
 14 to facilitate free passage absolutely before the
 15 injunction was granted. Is it your position that you've
 16 tried to do that since the injunction was granted?
 17 A. What are you asking me?
 18 Q. Well, is it your position that you say, "I have tried to
 19 facilitate free passage of the staff cars in and out of
 20 the Wyton site since the injunction was granted"?
 21 A. Whilst accommodating the right to protest, yes.
 22 Q. So, again, not absolutely. Would that be a fair
 23 assessment?
 24 A. Yes. Absolutely adhere -- tried to absolutely adhere to
 25 the conditions of the injunction, yes. They're always

1 in my mind.
 2 Q. But not to absolutely facilitate free passage?
 3 A. Yes, to not facilitate the -- not to dilute the protest,
 4 the right to protest so far down that we'd be 100 yards
 5 up the road, you know. So we're in the area, we're
 6 loud, we're passionate, and -- yes, and that the cars
 7 are going in and they're going to leave the site.
 8 MR JUSTICE NICKLIN: Okay. Let's get some grounds rules
 9 straight about -- Mr Curtin is giving evidence. You're
 10 not going to be putting to him, are you, that he's
 11 breached the injunction because, if you are, I have to
 12 give him a warning. No?
 13 MS BOLTON: No, my Lord, we're -- well, we're not putting to
 14 Mr Curtin he's breached the injunction. I'm asking
 15 Mr Curtin about what he understands his facilitator role
 16 is and how far it goes and what he facilitates.
 17 MR JUSTICE NICKLIN: All right. That's fine.
 18 MS BOLTON: So I want to be clear on that, Mr Curtin. Since
 19 the injunction has been granted -- you've given evidence
 20 that you facilitated the staff cars coming and going --
 21 A. Yes.
 22 Q. -- not absolutely, that they were slowed down -- that's
 23 your position -- before the injunction.
 24 A. Yes.
 25 Q. What has been your position after the injunction?

1 A. To -- because I have been involved with the
 2 injunctions -- over my 40 years' involvement in the
 3 Animal Rights Movement, I've had a number of injunctions
 4 that I've been involved in; injunctions very similar to
 5 this, actually -- yes, very similar.
 6 So just like I could use my experience of
 7 protesting, I could use my fairly extensive -- I think
 8 I'm in the textbook somewhere, Curtin v Huntingdon or
 9 Huntingdon v Curtin. So I could share that knowledge
 10 with people, especially people who are not -- who are
 11 brand new, for example, and one of my main priorities
 12 would be to give people as much information as possible.
 13 For example, if I may expand, some people might think
 14 that that injunction was literally like a force field
 15 and, if they passed it, they would go straight to jail
 16 and they would be arrested by the police. And to a --
 17 can I just give you a typical example of what I might
 18 say to someone?
 19 Q. Yes.
 20 A. Someone who -- we're by the side of the road, it's the
 21 first time we're about to protest. They see us standing
 22 at the road and they're like, "What are you standing
 23 over there for?", I would say, "There's an injunction".
 24 "Does that apply to me?", my answer would be, "We need
 25 to sit down. It's actually quite complicated. There's

1 such a thing as a persons unknown. I'm not here to tell
 2 you what or what not to do but it's not my job either to
 3 serve the terms of the injunction. But there is an
 4 injunction. It's up to that injunction. I am a named
 5 defendant. I would get in a lot of trouble if I went
 6 over the road. If you intend to go over the road, just
 7 be cautious. Nothing may happen if you go over the
 8 road, it could become extremely serious. You could end
 9 up with massive court costs against you. If you're
 10 a house owner, you may lose your house by going in front
 11 of the gates today", and people are like -- so to share
 12 my experience and -- yes, to share my experience.
 13 Q. So you wouldn't go as far as to say, "Please don't go
 14 and step in front of the cars. Please don't do that
 15 under any circumstances. We just don't want that here"?
 16 A. I'm under oath. I've heard other demonstrators, other
 17 Camp Beagle -- especially when the injunction -- that's
 18 the sort of language they used to use and it's not the
 19 language I would use, speaking to someone. "It's up to
 20 you. You do what you want, but I'm telling you now that
 21 there could be extremely serious consequences if you're
 22 doing it and, then again, nothing may happen". And my
 23 experience, in my eyes, it's very, very, very random --
 24 I think you've got a random selection of named
 25 defendants that make no sense whatsoever compared to the

1 scale of their activity. So my response to people would
 2 be a bit nuanced. No, I didn't use that language of
 3 like, "Whatever you do, you must not go into that box".
 4 It was more like, "There is a box. I'm not going there.
 5 You should be aware that there could be extremely
 6 serious consequences by you doing that, but it's up to
 7 you what you do".
 8 Q. So basically you leave it to their judgment?
 9 A. Yes, yes. I didn't -- yes.
 10 Q. Now, if I understand your position correctly, whilst
 11 there's been some splits between the protestors at the
 12 MBR site and within Camp Beagle --
 13 A. Yes.
 14 Q. -- you have the respect of a number of the protestors.
 15 Would that be a fair assessment?
 16 A. But you'd have to add the other bit and I've got
 17 disrespect from another section.
 18 Q. Yes.
 19 A. Yes, I get, "Oh, John, you're so great" -- I get it on
 20 Facebook and I get it on the ground, yes. I also get,
 21 "John, you're so bad and you're so terrible".
 22 Q. You've explained that what was happening at the MBR
 23 gates before the injunction was granted --
 24 A. Yes.
 25 Q. -- was a daily ritual.

1 A. Yes.
 2 Q. That's how you've described it. And that ritual would
 3 occur both when staff came and entered and exited the
 4 Wyton site?
 5 A. Yes.
 6 Q. It would occur when other contractors entered and exited
 7 the Wyton site?
 8 A. Yes.
 9 Q. And if I've also understood your position on this, your
 10 position is that you don't target a particular member of
 11 staff or contractor; you target all of them. It's
 12 a message to all of them?
 13 A. Yes, but while dealing with a particular contractor,
 14 it's the contractor -- you may have to -- some -- no
 15 targeting of individuals, of human beings. If you ask
 16 me about a contractor, if there's a contractor, there
 17 may be occasions where you give some details or you
 18 specify something about that contractor. So no
 19 targeting of individuals and some -- what's the word I'm
 20 looking for? -- some -- I don't know. If you're dealing
 21 with a van that does alarms or something, then I'm not
 22 making, "Oh, my God" -- there's nothing special about
 23 that alarm company. It's just another supplier. So in
 24 that level, yes, all contractors to be treated the same.
 25 Q. There would be some targeting of contractors, for

1 instance, an Impex van?
 2 A. The Impex van you could say -- you could put the --
 3 you'd have to put the Impex van into a different --
 4 I would put it into a different category.
 5 Q. What category would you put that into?
 6 A. Raw emotive blood on their hands nitty-gritty direct
 7 involvement in the dog suffering, direct. So Impex
 8 you'd have to put into a category of treating them very
 9 similar, perhaps, to how you might treat MBR. They
 10 would be animal abusers. It's a company who -- as far
 11 as I know, they specialise in transporting animals
 12 around the country, rather than the gas company or the
 13 alarms who just go in there because they've got the
 14 contract. So Impex -- a slightly special niche for
 15 Impex.
 16 Q. Would you agree that they are targeted specifically?
 17 A. Well, they are targeted -- not by me they're not
 18 targeted, but they are targeted as a campaign against
 19 them and so of the contractors they would stick out.
 20 There's no other contractors that I can think of that
 21 have gone in there -- the food suppliers, the people who
 22 supply the litter, they're just -- they don't care where
 23 they're going to. Impex are directly involved, I would
 24 say, in animal abuse so put them in the animal abuse
 25 category. The same would be if people had to come

1 inside with a big -- with blood extractors or something
 2 for the blood licence, these people -- there's a -- yes,
 3 there's -- Impex stick out like a sore thumb of all the
 4 contractors because of the nature of what they do.
 5 They're not just a van company, they ...
 6 Q. Let's look at it this way. The ritual doesn't
 7 coincidentally happen at the time the staff enter and
 8 leave or Impex enter and leave; it occurs because
 9 they're entering and leaving the site, doesn't it?
 10 A. I hope -- I'm not understanding.
 11 Q. So it's not coincidental that the ritual happens --
 12 A. Yes.
 13 Q. -- at the time --
 14 A. No.
 15 Q. -- either the staff enter and leave or Impex enter and
 16 leave? It happens because they're entering and leaving
 17 the site?
 18 A. Yes.
 19 Q. And I think you explained to some of the employees, when
 20 they were giving evidence, that they're targeted either
 21 because they work for MBR or because they work for
 22 Impex. That's the reason, isn't it?
 23 A. For the workers, the fact they're a worker, for Impex,
 24 because they are an Impex van, and someone supplying
 25 some gas, if you did get a chance to speak to them, you

1 just want to ask them to "Educate your bosses" and tell
 2 them why you're here, so there's different reasons.
 3 Q. Okay. Let's look at that. Let's look at the MBR staff
 4 first.
 5 A. Yes.
 6 Q. Whether you're the maintenance person --
 7 A. Yes.
 8 Q. -- somebody who works on admin in the offices --
 9 A. Yes.
 10 Q. -- or an animal technician, you've put to all of the
 11 staff that they're all culpable for the death of any
 12 dogs that are euthanised, whether on the site or
 13 elsewhere.
 14 A. Yes.
 15 Q. So you consider that they are all a legitimate target
 16 because they work for MBR?
 17 A. A target for protests, yes. These -- yes.
 18 Q. And it's also right, isn't it, that you consider the
 19 drivers of the Impex van to be a legitimate target
 20 because they carry the dogs between MBR and to places
 21 where you consider it will end with the dogs being
 22 euthanised?
 23 A. Killed. They're not euthanised in the labs. Not at
 24 all. That's not -- euthanasia is when you do something
 25 for their own --

1 Q. I'm not going to get into a debate on that.
 2 A. --- because sometimes --- sorry to go on.
 3 Targeted but not --- targeted as an Impex driver, not
 4 as Mr Bloggs, and you're targeted as an MBR worker, not
 5 as ...
 6 Q. Yes.
 7 A. Yes.
 8 Q. And when another contractor comes on to the site, if
 9 they wish to do business with MBR, they will also be the
 10 target of the protest message?
 11 A. Yes, but that --- it comes into a whole different variety
 12 of response, different types of responses. If there's
 13 an opening for discussion, then brilliant. Some of
 14 those --- a whole different array. Some people you can
 15 tell them what's going on and they're like, "What? In
 16 there?", and they'll do a U-turn and go. We've actually
 17 had that. We've had that from people who were horrified
 18 that they'd taken the contract on. There was a company
 19 called "Zircon", a flooring people. Then there's other
 20 contractors that know damn well what they're doing and
 21 they'll tell you, "Listen, mate, it's about the money".
 22 And then you'll get ones that just don't care and then
 23 they'll get the ones that, "Listen, it's nothing to do
 24 with me. I get forced to come here".
 25 So when you say "targeted", they all come into

1 the --- yes, but any vehicle that goes in and out of that
 2 business, I think it would be good for them to know that
 3 we're there and for them to be given full awareness of
 4 the business that they're involved in.
 5 Q. And save for those who might learn for the first time at
 6 the gate what MBR does and reverses out and says, "I'm
 7 not coming back" ---
 8 A. Yes.
 9 Q. --- they're subject to that targeting and that protest
 10 message, aren't they?
 11 A. Every --- all the other cars?
 12 Q. Yes.
 13 A. Some, yes. Of course. I'm a protestor. I wouldn't
 14 like to be standing there and a vehicle to drive in and
 15 we just not --- I can't think of a reason why I couldn't
 16 be bothered to address that person. Yes, whoever they
 17 are, they're important and they're worth addressing.
 18 Q. And concerning the MBR workers, would it be fair to say
 19 that the view is, from the point of view of the protest
 20 message and the targeting --- if they work for MBR, your
 21 view is they have blood on their hands; they're fair
 22 game effectively?
 23 A. Now you're asking me the protestors' point of view.
 24 I've challenged that term, the "protestor". Let's use
 25 it for simplicity, but, as I gave evidence there, it's

1 one of the biggest ranges of people I've ever had to
 2 deal with so I'd rather talk about me. And you've asked
 3 me, "Is someone fair game?". Yes, because they're
 4 connected with the company, but they're not fair game
 5 to --- for me, it would be a tactical mistake to ---
 6 "Mr Bloggs, the maintenance man, is a monster". That's
 7 taking it too far. This is the guy who works for MBR
 8 and we are challenging this situation. So it's to
 9 challenge. The idea of protest is to challenge, to make
 10 people think, provoke, break the train of thought.
 11 Q. But to be clear on that, Mr Curtin, you have put to all
 12 of the witnesses, whether they're the maintenance man or
 13 an animal technician, that they have blood on their
 14 hands because they work for MBR.
 15 A. Yes, I do believe that, yes. They all have culpability.
 16 Q. So you do consider them fair game, whether they're the
 17 maintenance man or the animal technician?
 18 A. They're fair game for either some education, fair game
 19 for --- yes, they're in the equation. By driving through
 20 the gate or wanting to drive through the gate, they come
 21 into the equation.
 22 Q. And you don't think there's anything wrong, therefore,
 23 with them having to suffer, for instance, drones flying
 24 over their heads when they're moving around the site,
 25 do you?

1 A. That would be up for them to talk of their suffering.
 2 Q. I'm asking you ---
 3 A. Yes.
 4 Q. --- if you think that's, in your view, something they
 5 just have to tolerate because they work for MBR?
 6 A. I think --- given the background, I think it's correct
 7 that people involved in a controversial industry,
 8 surrounded by secrecy, even if they've never known ---
 9 they're an alarm company, they've never had a drone
 10 watching them before --- in this scenario, yes, this is
 11 a place where the drone does fly. This is an unusual
 12 place and you may go to another place that sells
 13 potatoes later on this afternoon to put another alarm
 14 and I imagine you --- it's to give some people some
 15 background, some scenario. So I don't think --- I don't
 16 know why you mentioned that word "suffer", but people
 17 that should go into MBR, I see no problem at all why
 18 they shouldn't fully --- there's a protest camp outside,
 19 they can put two and two together and they can be told
 20 by security, "That's the protestors' drone up there",
 21 and they'll --- yes, if that's suffering, then --- I don't
 22 think it's suffering. It's not the word I'd use.
 23 Q. So you think it's legitimate because of who they work
 24 for that they should be followed by a drone when they're
 25 moving around the site?

1 A. I think it's important to get the truth out, I think
 2 it's important to discuss things, it's important to get
 3 it out in the light, and if a drone is a way of doing
 4 that, if they've got nothing to hide or -- they should
 5 welcome as much openness as possible.
 6 Q. And you think -- because they work for MBR, do you think
 7 it's right that they should be filmed on people's camera
 8 phones as they enter and exit the site with their
 9 registration numbers being filmed?
 10 A. I have filmed -- as workers are coming out, I have held
 11 the camera for some of the livestreams and I'm just
 12 saying -- I'm just showing the scene. I have filmed
 13 down the side, I have filmed and I have witnessed and
 14 I've engaged in people putting alarms up, and I think
 15 that's -- in this case it's extreme suffering we're
 16 dealing with, that, yes, I do feel that any contractor
 17 going into work at MBR can expect something that they
 18 wouldn't get in a potato factory. This is unusual so
 19 let's deal with it.
 20 Q. And that's the point, isn't it? You would accept that
 21 generally that may not be acceptable, but if you work
 22 for MBR, that's different?
 23 MR JUSTICE NICKLIN: Well, you're straying dangerously
 24 between what you're alleging Mr Curtin has done and what
 25 other people have done. Mr Curtin is not answerable

1 for -- Mr Curtin has been clear about the extent to
 2 which he has filmed and the purpose of doing so. You
 3 are putting to him whether he thought it was okay to
 4 film workers coming in and out of the MBR Acres. Now,
 5 that's not an allegation I understand you make against
 6 him and he's not here to answer for the behaviour of
 7 others.
 8 MS BOLTON: Well, my Lord, there is an allegation that
 9 concerns Employee V. It's not at the gates but I'm
 10 exploring with Mr Curtin what his position is on why he
 11 feels this is acceptable conduct.
 12 MR JUSTICE NICKLIN: Well, why is that relevant?
 13 MS BOLTON: Well, it is relevant, my Lord, from the position
 14 of it shows the reasons why the employees are being
 15 targeted and it's an issue between Mr Curtin and the
 16 claimants as to what amounts to targeting. So that's
 17 what I'm exploring. I don't have many more questions on
 18 it, my Lord.
 19 MR JUSTICE NICKLIN: Right.
 20 MS BOLTON: It's right, isn't it, Mr Curtin, that when this
 21 ritual was taking place of the workers entering and
 22 exiting the Wyton site, each individual staff car was
 23 slowed down or stopped?
 24 A. No, in 22 months since the injunction, you've had
 25 three/four solid months, varying degrees, but it would

1 be typical in August -- it would be a typical event for
 2 some slowing-down to take place, yes.
 3 Q. But it wouldn't be a case of just slowing down the first
 4 car and then stepping out the way and all of them
 5 continuing to drive past. It would be slowing down of
 6 individual cars, wouldn't it?
 7 A. There was some even discussion I mentioned earlier to
 8 my Lord about entering negotiations with the police
 9 that, yes, in fact, each car -- the protestors want to
 10 get a message to kind of each car. So there was an
 11 element of, like, "This is your turn" -- you said about
 12 fair game -- "This is your turn to have the protest",
 13 and then "This is your turn" and "This is your turn".
 14 Yes, there was an element of -- yes, that each person --
 15 each person should be aware of the protest, yes.
 16 Q. And it's right, isn't it, that it wasn't a case of, as
 17 the staff cars entered or exited the site, everybody
 18 stood back once the first car had gone through and
 19 simply shouted a message? Things were shouted by you,
 20 with the loudhailer quite often, directly at individual
 21 drivers or passengers --
 22 A. Yes.
 23 Q. -- of those vehicles?
 24 A. Yes.
 25 Q. And in that respect they were individually targeted,

1 weren't they?
 2 A. No, each -- no, I actually don't accept that. Only in
 3 the fact that if you start treating them as Employee A,
 4 Employee B, how is -- I would agree I could see no
 5 problem with the -- what you call "targeting each
 6 person". Each car, you want to get a message to each
 7 human being in that car. So I kind of get your point,
 8 that on one respect there's this generic thing, but
 9 let's -- each person, as they go in, you can't -- we're
 10 people. You've got to get the message to the --
 11 Q. To the individual.
 12 A. -- it's too simple to say "all the workers". I get what
 13 you're saying, but on one level -- but no person for any
 14 particular different treatment. They would all get the
 15 same treatment, and in that case targeted but all the
 16 same.
 17 Q. Well, you heard some of the witnesses give evidence that
 18 they had experienced protests in the past at the Wyton
 19 site but that their perception of that protest was that
 20 it was not as intense as this. One of the things that
 21 the witnesses singled out was the difference between
 22 having people shouting right up at their car --
 23 A. Yes.
 24 Q. -- and a protest that was further away from them, that
 25 might chant and shout slogans when they entered and

1 exited the site . This ritual was going up to each
 2 individual and shouting at them the protest message,
 3 sometimes through loudhailers, sometimes through people
 4 surrounding the car and holding placards up, sometimes
 5 over the windscreen. It was much more focused on each
 6 car, wasn't it , than a situation where everybody stood
 7 back and chanted as they just drove through?
 8 A. We could still stand back and chant and you could say
 9 some terrible things --
 10 Q. Yes.
 11 A. -- standing back and target ... So I give the same
 12 answer, that there was -- and it felt important to a lot
 13 of people that each worker should know that we're here.
 14 So I get your point, but, remember, targeted but
 15 targeted all the same, if you want to use that.
 16 Q. Yes, I think we might be getting hung up on the word
 17 "targeted" here, Mr Curtin.
 18 A. Yes.
 19 Q. The point is there was a focus of putting the message
 20 across to each individual staff member, wasn't there?
 21 A. Yes, because -- yes. Well, you can't have
 22 a groupthink -- it would be impossible for workers to
 23 come to decisions collectively .
 24 Q. As I've understood it, it's your position that if they
 25 work for MBR, they should expect to experience that kind

1 of protest?
 2 A. When you say "that kind", it would be like if you work
 3 for MBR --
 4 Q. Because I think that's important; not "protest", "that
 5 kind of protest".
 6 A. -- you should expect a possibility that there's going to
 7 be a demonstration and I rejoice in the fact that people
 8 are actually protesting, so -- and seeing as we're
 9 talking about the camp, "The camp is there. Deal with
 10 it . You work for this company. It's extremely
 11 controversial". So, yes, I would ask them that there
 12 should be, amongst the workers, a level of acceptance,
 13 which some of the witnesses did show some level of
 14 acceptance for what they called "peaceful protest".
 15 Q. Now, I want to make sure we're clear on your answer
 16 there. I asked you whether it's your view that the
 17 workers of MBR -- we've talked about the more focused
 18 protest on the individual members of staff as they
 19 access and leave the site and the ritual that was being
 20 undertaken before the injunction.
 21 A. Yes.
 22 Q. I'm asking you, is it your view that if somebody works
 23 at MBR, that they should expect that kind of protest?
 24 Never mind other forms of protest, that kind of protest.
 25 A. Yes, I don't want to -- they should -- they've got to

1 accept some level of angry protests.
 2 Q. Angry protests?
 3 A. They know people are angry. There's anger about this,
 4 there's emotions. So, yes, to want to -- to shut your
 5 eyes and hope the protestors have gone away, it's not
 6 going to happen, so --
 7 Q. But that's not what I'm asking you. You're answering
 8 a slightly different question there.
 9 A. Okay.
 10 Q. I'm asking you, is it your view that the ritual that was
 11 happening before the injunction of holding up staff
 12 cars, directing the protest message in a very focused
 13 way at the staff, that that is something people who work
 14 from MBR should expect?
 15 A. Okay. Well, there's -- you talk of particular focus in
 16 on the staff. The focus on the staff comes as they're
 17 driving in. That's all. The only reason they're being
 18 focused on, because they're physically there. And I'm
 19 going to give a pretty similar answer on that. I'm not
 20 going to say they should expect -- well, it depends.
 21 You know, like people swearing at them, it's not -- you
 22 know, I can understand how that's not nice and not
 23 pleasant, but some level of expectation of protest. And
 24 then, when there's police around and we have
 25 injunctions, they know that we don't live in a world

1 without police or ... so, yes, I give the same answer,
 2 I'm afraid. Not -- I think -- I don't know if you're
 3 trying to get me to say they should expect exactly what
 4 happened to them.
 5 Q. Well, that's what I'm asking you. What's your view on
 6 that?
 7 MR JUSTICE NICKLIN: The trouble is there's a huge variety
 8 of what's happened on almost every occasion. There are
 9 some similarities and there are themes in the protest,
 10 but there are particular aggravating factors in certain
 11 instances. You're trying to package it into a, "This is
 12 what was going on. Do you think they have to expect
 13 that?". The trouble is that there's a wide variety of
 14 what's going on.
 15 MS BOLTON: My Lord, I'm --
 16 A. Some of them expected to be dragged out their cars,
 17 didn't they? Some of them expected a lot worse.
 18 Q. We'll come to all of that later, Mr Curtin.
 19 But, my Lord, I'm obviously very much --
 20 MR JUSTICE NICKLIN: I'm not sure of the value of the
 21 question, you see, because I'm trying to think, well,
 22 ultimately, what cause of action does this go to and
 23 what ultimately are you going to submit to me on the
 24 back of it .
 25 MS BOLTON: My Lord, I'm simply dealing with Mr Curtin's

1 word of "ritual" and wanting to understand. He's drawn
 2 the distinction of ritual as to whether he thinks that's
 3 something --
 4 MR JUSTICE NICKLIN: Well, "ritual" -- Mr Curtin will
 5 correct me if I'm wrong -- I've understood his use of
 6 that word in the way that he's used it in the
 7 cross-examination of witnesses is to describe the
 8 pre-injunction protest behaviour of standing in the path
 9 of vehicles in order to delay their entry to the site so
 10 as to confront them with the protest message.
 11 MS BOLTON: Yes. I'm asking Mr Curtin if it's his opinion
 12 that people who work for MBR should expect that.
 13 A. Okay. Let me answer it like this. Because some
 14 expected perhaps to be dragged out of their cars and
 15 have their windows smashed, exactly as things turned
 16 out -- I don't know. To have some expectation, yes --
 17 you're going to go on a demonstration, there's going to
 18 be a variety of people there. I can't think they're
 19 going to expect everyone there to be completely animated
 20 but they've got to expect that some people are really
 21 angry. And the reason I use "ritual" is because, if
 22 they're heading towards these people, going, "Shame on
 23 you", they could expect that to get completely out of
 24 hand. But the reason I called it a "ritual", because it
 25 didn't go wildly out of hand to the point where the

1 police would intervene and arrest everyone. So that's
 2 why I called it a "ritual", because it looks relatively
 3 heated and explosive but in fact everyone kind of gets
 4 to have an idea of eventually what's going to happen.
 5 Q. Okay.
 6 A. So, yes, by working at MBR, those first three months
 7 wasn't -- they could have expected that kind of thing.
 8 Once the camp had started up and the daily protests,
 9 yes, some level of expectation should be expected from
 10 those people. This talk of us being this quiet
 11 protestor, this peaceful protestor, they need to get
 12 real. People have strong feelings about this. So it's
 13 not extraordinary, what happened, and any
 14 right-thinking, ordinary, reasonable person could have
 15 a level of expect -- that, yes, they're going to drive
 16 in, people are going to be going crazy. Yes, expect
 17 that in the world that we live in.
 18 Q. Okay. Do you think that you -- when you're protesting
 19 against MBR and its activities, do you think that it's
 20 right that you enter their land as part of your protest?
 21 A. Well, I wouldn't expect them to think it's right, no.
 22 They're going to be, "How very dare you?".
 23 Q. But I'm exploring with you, Mr Curtin, do you think it's
 24 right for you?
 25 MR JUSTICE NICKLIN: Okay, why is that relevant? Trespass

1 is -- the law doesn't expect you to either accept or
 2 reject the law of trespass. It's just a question of
 3 whether you do or not.
 4 MS BOLTON: It's going to be relevant to your discretion,
 5 my Lord, at the end of this and what remedies you should
 6 grant.
 7 MR JUSTICE NICKLIN: Right.
 8 A. There's a whole variety of new protest laws. I'm aware
 9 of aggravated trespass. So whether I believe it's
 10 philosophically -- there's laws that relate to this.
 11 There's police, there's criminal laws. So you're asking
 12 me -- it's a really massive hypothetical question,
 13 whether I think it's right for myself to trespass --
 14 MS BOLTON: No, do you think it's right?
 15 A. For who? For me or for other people?
 16 Q. For you, in your protesting, to enter MBR's land.
 17 A. Well, I've talked before of when I actually did break
 18 in, many, many years ago, and I pleaded honest intent.
 19 At that time I did feel a necessity myself and
 20 I understand the Animal Rebellion people -- well,
 21 I don't know. But the reason that I haven't trespassed
 22 on MBR Acres is completely down to the law.
 23 Q. So it's down to --
 24 A. I don't have to think about any morality relating to it.
 25 I would -- and in Italy -- we haven't talked about

1 much -- the local people did just that and they did this
 2 trespass and they took dogs. I'm on oath here, and it's
 3 not -- I was delighted. It gives me joy to witness
 4 that. Yes, it looks like a crime, but what if it's not?
 5 So -- but you're asking me about me and trespass and
 6 I'll go to the law book.
 7 MR JUSTICE NICKLIN: Right. Lunchtime. We'll come back at
 8 2 o'clock, Mr Curtin. The same rule applies to you
 9 while you're giving evidence, which is you mustn't
 10 discuss your evidence with anybody else.
 11 A. Okay.
 12 MR JUSTICE NICKLIN: All right?
 13 A. Yes.
 14 MR JUSTICE NICKLIN: See you at 2 o'clock.
 15 (1.02 pm)
 16 (The short adjournment)
 17 (2.04 pm)
 18 MR JUSTICE NICKLIN: Right, are you okay?
 19 A. Yes.
 20 MS BOLTON: Now, Mr Curtin, I don't think we need to go to
 21 it, but it's right, isn't it, in your defence you've
 22 said at paragraph 2 that you consider MBR to be
 23 a criminal enterprise?
 24 A. Absolutely.
 25 Q. And you want to see MBR Acres shut down?

1 A. Yes.
 2 Q. And your position is that you will continue to protest
 3 there until you achieve that objective?
 4 A. I hope I continue to protest that long, yes.
 5 Q. It's right, isn't it, there's been no prosecution
 6 against MBR Acres Limited?
 7 MR JUSTICE NICKLIN: Okay, now, where are you going with
 8 this?
 9 MS BOLTON: Well, again, it's part of the witness' evidence
 10 that they are a criminal enterprise and I think that
 11 this is -- I've understood this might be part of an
 12 argument on harassment, so I'm simply just doing a few
 13 questions, my Lord, to confirm that we both understand
 14 each other on what has and hasn't happened at MBR Acres.
 15 MR JUSTICE NICKLIN: Right. This is a topic you're not
 16 likely to agree upon and it's not one -- I've been at
 17 pains to make clear to Mr Curtin that I'm not going to
 18 be ruling on any of these things.
 19 MS BOLTON: I'm not going into any detail about cases in
 20 other jurisdictions or anything like that, my Lord. I'm
 21 simply talking about the claimant.
 22 MR JUSTICE NICKLIN: Right, okay.
 23 MS BOLTON: There's been no prosecution against MBR Acres
 24 Limited, has there, Mr Curtin?
 25 A. There hasn't been but there should be, and if it

1 necessitates a change in the law, then that must happen.
 2 The fact that there hasn't been a prosecution is what's
 3 at stake here. There should be.
 4 Q. And you've been outside the gates of MBR Acres
 5 protesting for nearly two years. In that time you've
 6 flown drones over the site on countless occasions,
 7 you've placed a camera on a stick and fed it through the
 8 air vents of one of the buildings at the Wyton site and
 9 filmed inside that building and you've obtained video
 10 evidence from break-ins from Animal Rebellion. None of
 11 that evidence has led to any prosecution of MBR Acres
 12 Limited, has it?
 13 A. Number one, I didn't put a camera on the end of a pole.
 14 A camera was put on the end of a pole. I didn't put it
 15 at the end of a pole --
 16 Q. I thought you accepted that when we looked at the
 17 footage in your evidence --
 18 A. Yes, I'm part of that general team and you're absolutely
 19 correct that -- and I see that as perhaps the biggest
 20 scandal of all, that Britain, a nation of animal
 21 lovers -- I would say we've got a catalogue of crimes,
 22 but the way the law stands at the moment, you're
 23 correct, it hasn't been possible to bring out
 24 a successful prosecution.
 25 Q. No, because whilst it's your view it should be classed

1 as criminal activity, it is actually legal, isn't it?
 2 A. Tragically, yes, but the -- if they were to conduct
 3 themselves like they should, according to the
 4 paperwork -- it's a scandal that that is not illegal,
 5 but it's my belief that it's an industry that's been
 6 hidden away behind ivory towers and razor wire and
 7 secrecy and I believe, like in Italy, if a judge were --
 8 in this country, a judge, the judiciary, the police, the
 9 RSPCA, the MPs cannot get involved. It's only down to
 10 the Home Office and even the regulation unit of the
 11 Home Office is paid for by Marshalls. So I want to see
 12 a change in the law and -- yes.
 13 Q. I just want to make sure we understand each other's case
 14 on that.
 15 Now, you put to all of the witnesses that their
 16 concerns of you were based on gossip.
 17 A. Yes -- no, not all gossip but -- based on what they'd
 18 witnessed, but that would be filtered and coloured by
 19 the gossip, always.
 20 Q. We're not going to look at what a lot of that gossip, in
 21 your view, may have concerned, but one of the things
 22 that you canvassed with the witnesses was your break-in
 23 to the Wyton site.
 24 A. Yes.
 25 Q. And it's right, isn't it, that you accept that as part

1 of that break-in you stole 82 beagles from the Wyton
 2 site?
 3 A. No, I don't accept. My defence was honest intent and
 4 part of that is I do not consider -- I understand the
 5 technicalities of it but I don't consider those dogs
 6 should be classed as property.
 7 Q. Let me put it to you in a different way then. It's
 8 right, isn't it, that you were convicted --
 9 A. Yes.
 10 Q. -- of stealing 82 dogs?
 11 A. Yes.
 12 Q. You succeeded in carrying out this break-in after
 13 a significant amount of surveillance at the site,
 14 didn't you?
 15 A. Yes.
 16 Q. And you realised through your surveillance, if I've
 17 understood correctly, that there was a weakness in that
 18 you could access the dog pens via the roof?
 19 A. Yes. Any security firm is going to have its weakness
 20 and the job of that surveillance would be to find the
 21 weakness. Ah --
 22 Q. And that allowed you to drop directly into the dog pens,
 23 didn't it, where there wasn't any alarms or movement
 24 sensors?
 25 A. Yes. Do you mind if I expand on the reason why we went

1 through the roof and why we knew the roof wasn't
 2 alarmed?
 3 Q. Yes, please.
 4 A. And, remember, I'm on oath. It's because when I was
 5 planning --- helping to plan the raid --- that's what
 6 I would call it, "the raid" --- I asked the help of the
 7 local hunt saboteurs, and their response was, "We're
 8 already looking at it. We've already had I think one
 9 dog taken out of the site", and they were already
 10 looking into it. And they'd done a stall, an
 11 information stall in the town centre, and an ex-worker
 12 had come up to them and she was in tears and she
 13 explained that she used to work there, she got
 14 emotionally attached to one of the dogs, she asked the
 15 manager if she could take it home. The manager told her
 16 to bring the dog to the office. The dog was then, as
 17 you would say, "euthanised" --- I would say "killed" ---
 18 in front of her with an injection to the heart. The dog
 19 was screaming. She was given the sack a week later.
 20 They said she had hair lice and that was the reason she
 21 had the sack. She was a very embittered ex-worker and
 22 she was able to --- I met her and she was able to give
 23 the full plans of the security. So that's why we chose
 24 the roof, because she told us that the doors and the
 25 alarm --- and even in the corridors there were movement

1 sensors.
 2 Q. And it's right, isn't it, that that was at the time when
 3 the site was owned by Harlan Interfauna; yes?
 4 A. No, it was owned by Interfauna.
 5 Q. Interfauna, just Interfauna.
 6 A. Yes, and then that was --- it became Harlan Interfauna.
 7 Q. And it's right, isn't it, that you --- when you were
 8 cross-examining the witnesses, I think you indicated
 9 that you were proud of your actions that day.
 10 A. Definitely not ashamed. "Proud", a bit too ego, but,
 11 yes, I am proud of my involvement in that.
 12 Q. Now, you've raised concerns that you've been singled out
 13 in these proceedings because of your past ---
 14 A. Yes. Yes.
 15 Q. --- but in fact it's right, isn't it, that a number of
 16 the people who were named as defendants in these
 17 proceedings didn't have any criminal past at all,
 18 did they?
 19 A. Correct.
 20 Q. And it's right, isn't it, that the real reason why
 21 you're here is because they've either settled or their
 22 claims have been stayed? That's just left you.
 23 A. That's the reason I'm in the witness box.
 24 Q. Not because you've been singled out because of your
 25 past. You're just simply the defendant that hasn't

1 settled or had their claim stayed?
 2 A. I accept that it --- on the face of the evidence, it's
 3 not totally illogical to put my name there, but what is
 4 illogical is the testimony of the witnesses to say how
 5 they found me particularly terrifying, et cetera. So
 6 I can understand how I drew attention to myself and
 7 I am --- there is video of me on the drive acting in an
 8 animated way, but --- for example, there's a video that
 9 one of the witnesses talked about in their evidence and
 10 "Mr Curtin is waving a flag". So what? I don't think
 11 that would have been pointed out with any other
 12 defendant, that they were around. And really? Who else
 13 isn't on the injunction? Will Young, for example.
 14 Q. Well, we've done that discussion before ---
 15 A. We've never done that.
 16 Q. --- in other hearings, Mr Curtin, but ---
 17 A. I find it baffling that I find myself --- considering the
 18 evidence against me is --- I'm not dismissing it, I'm not
 19 being complacent --- on the really, really low end of the
 20 scale and there's --- if I wanted to be some sort of
 21 supergrass, I could --- and your company should know
 22 it --- I can name at least 40 to 50 --- I won't do --- but
 23 other people who should be way above me in the terms of
 24 their engagement and what they've done to deserve being
 25 on the injunction, so I'm, in my actions, way down the

1 scale.
 2 Q. Now, you say your actions are down the scale. Let's
 3 start to have a look at those, then, please.
 4 A. Okay.
 5 Q. I'm going to start with the incident of 13 July.
 6 Mr Curtin, before we go through these incidents, I just
 7 want to be clear, at the Wyton site you've got the
 8 highway?
 9 A. Yes.
 10 Q. When you turn off the highway, you enter what has been
 11 throughout the pleading referred to as the "access
 12 road". That's the road leading up to the gates?
 13 A. Access road, driveway.
 14 Q. I just want to be clear, so when I put points to you,
 15 you understand the difference.
 16 A. Okay, yes.
 17 Q. You're aware that there's a yellow line now ---
 18 A. There is now, yes.
 19 Q. --- partway across the access road?
 20 A. Yes.
 21 Q. Between that line and the metal strip before the gates
 22 I'm going to refer to as the "access land"; okay?
 23 A. If you choose, yes.
 24 Q. Just so you're clear what we're talking about.
 25 A. Yes.

1 Q. Which you know that the first claimant considers to be
 2 their land?
 3 A. Yes, but if you show me incidences prior to me listening
 4 to all the discussions about the orange band, the access
 5 road used to be called the "driveway" and everybody
 6 treated it --- it got treated in so many different ways.
 7 There was one argument that it was a private road, one
 8 argument it was part of the highway. It was never
 9 known --- "no man's land" I used to personally call it,
 10 because of the amount of massive conversations with
 11 the --- "no man's land" is what I called it.
 12 Q. So, just so we're clear, when I'm talking about the
 13 "driveway", I'm talking about the bit between the metal
 14 strip and the gates to MBR because that's what we've
 15 pleaded it as in the particulars of claim; okay?
 16 A. Say that again. The metal bit and the gates ---
 17 Q. The metal strip and the gates ---
 18 A. Oh, the access land, yes, I understand.
 19 Q. No, that's the "driveway". The "access land" is the bit
 20 between the metal strip and the yellow line on the road
 21 and the rest of it is just the access road. It's part
 22 of the public highway.
 23 A. Okay.
 24 Q. Okay?
 25 A. Yes.

1 Q. Don't worry, I'll remind you if you're in any doubt, but
 2 I just want to be clear because that's how the claimant
 3 has pleaded it ---
 4 A. Okay.
 5 Q. --- so that's why we're using those terms; okay?
 6 A. Yes.
 7 Q. Now, I'm going to start with 13 July and if we could go,
 8 please, to video 24 and if we could play the first
 9 17 seconds of that video, please.
 10 (Video played)
 11 Right. Can you go back just a tiny bit, please?
 12 Just there will do. Right. Mr Curtin, that's you,
 13 isn't it, on the far side of the access drive ---
 14 A. Yes.
 15 Q. --- with the loudhailer in your hand, isn't it?
 16 A. Yes.
 17 Q. Can we play to 26 seconds, please?
 18 (Video played)
 19 And it's right, isn't it, we can see you're moving
 20 from the side to the middle --- from the side, just as
 21 the car is coming out to access the highway?
 22 A. I really don't want to be --- I don't think --- I haven't
 23 moved to the middle. I'd still class --- it looks --- I'm
 24 the other --- I'm on the side of the ---
 25 Q. Let's go back a few seconds, please. Can we go back to

1 20 seconds, please? If we could play there, please.
 2 (Video played)
 3 We can pause now. Right, you've moved back and
 4 forward there, haven't you?
 5 A. This is going to go on quite a while ---
 6 Q. Well, don't worry. We'll pick up speed.
 7 A. If I can help you by --- if I could --- I'm still a little
 8 tiny figure. I'm still in --- I'm not in front of the
 9 car so far. I've come towards the car, but I'm --- yes.
 10 Q. You're one of the people on the access road at the
 11 moment, aren't you?
 12 A. Absolutely, yes.
 13 Q. And that's --- all of you are preventing that car from
 14 accessing the highway at the moment. That's right,
 15 isn't it?
 16 A. Not preventing, allowing. Remember, my thing is to
 17 facilitate. I'm allowing that car to get onto the
 18 highway in a safe way, considering a heated
 19 demonstration is taking place.
 20 Q. It's right, isn't it, that at the moment that employee,
 21 who is Employee F, cannot simply drive down the access
 22 road and access the highway? That's right, isn't it?
 23 A. Yes, because, if he did, he'd run over two police
 24 officers.
 25 Q. And some protestors; yes?

1 A. Yes.
 2 Q. Including you?
 3 A. Yes --- no, not including me.
 4 Q. Okay. We'll keep having a look at this in a moment.
 5 If we can play the video and pause at 40 seconds,
 6 please.
 7 (Video played)
 8 Right. So that's you with the megaphone directing
 9 abuse directly at Employee F's car, isn't it?
 10 A. No, because I'm not directing abuse. I'm directing
 11 protest slogans. I'm talking about --- when they start
 12 to come out, "Are you going to have a shower? You won't
 13 wash this smell". It's not to do with their own
 14 personal hygiene, it's to do with the smell of where
 15 they work. I'm at the side and I've got a loudhailer,
 16 which is an iconic thing that protestors use, so, so
 17 far ---
 18 Q. It allows you to shout at him loudly, doesn't it, from
 19 fairly close to his car?
 20 A. I've used one for 40 years. If you think of who uses
 21 a megaphone, there's nothing more iconic than
 22 a protestor. I've been arrested for using a megaphone
 23 before and been found not guilty. A megaphone is a tool
 24 of protest.
 25 Q. Yes, but it's loud, isn't it?

1 A. This one, if you look at it -- it's like a toy one, this
 2 one. If you get a chance to see it, it's small, made in
 3 China. There's different types of megaphones. There's
 4 one that really deliver a --
 5 Q. You're shouting at him loudly through that megaphone?
 6 A. I'm shouting, like you do on a protest. The windows are
 7 shut. I want to make sure my letters -- my messages are
 8 heard. This is probably within a day or two of me
 9 getting there. I'm sure, as we go on, my voice --
 10 I literally lost my voice. So the megaphone is an aid
 11 to protesting. If I wanted to -- if one of my things
 12 was to target people's ear lobes to damage -- I don't
 13 know -- that's not my intention.
 14 Q. It's so that your protest message can be clearly and
 15 loudly heard by the staff member in the car, isn't it?
 16 A. Yes.
 17 Q. It's right, isn't it, that if we look there, you're
 18 standing on the access land which is owned by the
 19 claimant?
 20 A. I'll just say "Yes" because I might be on the verge
 21 because you can't -- but yes. Yes, I'll accept.
 22 Q. Now, as we go through this video -- because I don't want
 23 to have to keep stopping it every time you go on to the
 24 access land in this video --
 25 A. Yes.

1 Q. -- I'm going to say to you that -- put to you that you
 2 do go on to the access land you're going to see in
 3 a moment on a number of occasions and the actual
 4 driveway, the bit between the gates and the metal strip.
 5 A. Yes.
 6 Q. So if we can -- it's right, isn't it -- you don't
 7 suggest for one minute that you've been invited onto
 8 MBR's land, do you, by MBR?
 9 A. Ah, it's really, really important to understand that at
 10 the point -- I am treating this like everyone else, like
 11 every police officer, every protestor, every security
 12 guard, that this is a driveway. I am aware of the laws
 13 of trespass. There's trespass and there's aggravated
 14 trespass. Aggravated trespass is when you go on to
 15 trespass with the idea of interfering with someone's
 16 lawful pursuits. So if I did know at this time that
 17 this driveway was private property, by slowing the cars
 18 up, you can kind of -- there could be an argument that
 19 it's possibly aggravated trespass, once you do know.
 20 You understand? But I'm actually -- I'm thinking of the
 21 criminal law on tres-- -- I'm not even thinking of the
 22 criminal law on trespass. I'm on -- part of the highway
 23 is how I acted on that day and every day until we
 24 started to talk of yellow lines and having sat here.
 25 Q. Okay. But it's no part of your defence, is it, that you

1 were invited by MBR onto MBR's land?
 2 A. That's not part of my defence.
 3 Q. And it's right, isn't it, that the reason you stepped
 4 into that area that we can see you in in the video is
 5 because you wanted to deliver your protest message to
 6 the driver of that car?
 7 A. Yes. Ideal, convenient place. I can't go -- I could go
 8 into the land but that would obviously be trespassing.
 9 I can't go into the road. That would be a road traffic
 10 problem. So here, it's -- yes -- a no-brainer. If
 11 there's going to be a demonstration, this is where it
 12 should be.
 13 Q. Right.
 14
 15 Cross-examination by MS BOLTON
 16 And, remember, I'm with other
 17 people who definitely want
 18 to -- who definitely have
 19 other -- they have different
 20 ideas to me and a different
 21 range, but I had -- me
 22 standing there, there was no
 23 intention at all of adding or
 24 subtracting particularly to
 25 the amount of time that this
 person was going to spend
 there.
 Q. Let's play on to 1 minute, 24 seconds, please.
 (Video played)
 Right. So it's right we can see you in that video
 follow Employee F along the access road all the way to
 the highway, can't we?

1 A. I'm not sure where I am. But just so I don't disagree
 2 with everything you say, I walked off and I was in
 3 mid-sentence as the car went off, so I get very little
 4 chance, this little bubble of opportunity to speak to
 5 the workers, so, yes, I went near to the road.
 6 Q. And, in fact, if we look at the gentleman in the
 7 white -- there's a white T-shirt. Can you see --
 8 A. Yes.
 9 Q. -- there's somebody with their arm out on the left-hand
 10 side --
 11 A. Yes.
 12 Q. -- and there's a person in the white T-shirt and then
 13 just behind that, that's where you are, isn't it?
 14 A. I'd only be agreeing with you now for the sake of it.
 15 I don't know.
 16 Q. Would you like me to take the video back a little bit so
 17 you can see?
 18 A. I'm not really disputing it, where I'm standing. I'll
 19 take your word for it at the minute. I'll believe you
 20 that I'm there.
 21 Q. Okay. It's right, isn't it, that that's preventing him
 22 from having a clear path to the highway and a clear view
 23 along the highway?
 24 A. I don't wish to be clever, but are we looking at the
 25 same image?

1 Q. Yes.
 2 A. There's police, there's protestors, there's one, two,
 3 three, four, five, six, seven -- there's eight more
 4 protestors, if you're saying that is me, between me --
 5 that car has got more than me to worry about. I am part
 6 of this group, yes.
 7 Q. Well, let's rewind it by 20 seconds, please, and play it
 8 back to 1 minute, 24. We can see where you are.
 9 A. Yes.
 10 Q. If we could play that.
 11 (Video played)
 12 Pause there, please.
 13 A. Yes.
 14 Q. We can see it's not the other protestors, is it, that
 15 are following Employee F out on to the road? It's you.
 16 A. It is. Leave -- giving some invitation to leave. Yes,
 17 I'm finished with my sentence.
 18 Yes, that person, whoever they are -- remember, I've
 19 only -- I still -- we'll never going to find out who
 20 they are -- "You're a MBR worker". So it's that same
 21 point, they're getting -- they're just -- generically
 22 they're getting targeted and it happens to be this one,
 23 and, without watching it, I'm going to give all
 24 importance in a minute to this next car.
 25 Q. And it's right, isn't it, that by doing that, you're

1 interfering with his ability to access the highway?
 2 A. I am part of a group of protestors that are there.
 3 They're in there with the police there. I did not have
 4 a civil injunction in mind and, if I had, I would have
 5 still stood there because no one would have suggested
 6 I was on private property at that point.
 7 Q. But you are interfering with his ability to access the
 8 highway, aren't you?
 9 A. Yes, we all are. We're there. We exist and we're
 10 there.
 11 Q. And by not giving him a clear view to the right, you're
 12 also obstructing his access on the highway, aren't you?
 13 A. That's not my aim, and I'm behind the car. I never --
 14 I'm amazed and I'm really grateful -- and thank God
 15 there hasn't been a serious accident while Camp Beagle
 16 has been there for 20 months. I actually think it's
 17 a miracle. It's more in terms of -- well, and constant
 18 vigilance to it. But I'm there and, because I'm there,
 19 if I'm standing there as a protestor and I'm in some way
 20 impairing a perfect view if I wasn't there, then, yes.
 21 But these thoughts were not in my mind and they're more
 22 likely -- they should have been in the mind of the
 23 police officer really. In fact the police did
 24 eventually -- and especially the highways man, it became
 25 an issue. It was not an issue on that day. If it had

1 been pointed out to me, I would have been more than
 2 happy -- because my job that day was to protest and it
 3 wasn't to endanger anyone. I wouldn't have wanted that.
 4 Q. If we could play on to 1 minute, 40 seconds, please.
 5 (Video played)
 6 Now, you're shouting at the next staff vehicle again
 7 through the loudhailer --
 8 A. Yes.
 9 Q. -- and it's right, isn't it, that on this occasion
 10 you're on -- you're certainly on both the driveway and
 11 the access land, aren't you?
 12 A. We now know -- yes, I am by the gate, which we now know
 13 is the access land.
 14 Q. No, but you're also on the driveway, though, aren't you?
 15 A. I'm on the driveway, yes.
 16 Q. If you look at where that metal strip is --
 17 A. Yes.
 18 Q. -- where your leg is ...
 19 A. I'm probably this side of -- I treated the metal bar as
 20 a bit of a force field, so I'm this -- I'm the
 21 protestors' side of the metal bar, I imagine. That
 22 would be my intention. If you're able to show me a bit
 23 where I'm not, then that would have been a minor mistake
 24 by me.
 25 Q. We'll look at those in a moment, Mr Curtin.

1 It's right, isn't it, again you're directing your
 2 protest message directly at the driver of that vehicle?
 3 A. Being a worker in MBR, they're driving past me, I'm
 4 seeing my job at that moment as a picket line, so
 5 a worker is coming past -- so, yes, at this present
 6 moment in time, 3.57.37, this car -- it could be any
 7 car. It's not important to me what car.
 8 Q. If we can play on to two minutes and 8 seconds, please.
 9 (Video played)
 10 And again we see you following the staff member all
 11 the way to the highway -- sorry, to the carriageway,
 12 shouting at them and preventing them having unimpeded
 13 access onto the highway?
 14 A. I'm making use of every last nanosecond while that car
 15 is within hearing distance. There's no evidence that
 16 I'm blocking the road in that way and it wasn't my
 17 intention anyway. So, no, I don't accept that I'm --
 18 Q. Again, you're right on the part of the road where the
 19 road meets the carriageway --
 20 A. Yes.
 21 Q. -- obscuring a driver's view?
 22 A. I don't think your case is -- I reject that. There
 23 might be some other videos where I'd have to go "Yeah",
 24 but, no, case not proven for me.
 25 Q. Well, Mr Curtin, a number of the employees have given

1 evidence about their views being obscured.
 2 MR JUSTICE NICKLIN: Well, they didn't give evidence that
 3 Mr Curtin was doing it.
 4 MS BOLTON: Employee F did on this incident, my Lord. It's
 5 Mr Hardy's evidence. He was a named witness.
 6 So it's right, isn't it, Mr Curtin, once again
 7 you're following that car all the way to the highway,
 8 interfering with their right to access the highway and
 9 obstructing them trying to access the carriageway?
 10 A. I don't accept that.
 11 Q. Can we play on to three minutes and 20 seconds, please?
 12 (Video played)
 13 And again we've seen you standing close to the green
 14 car with your loudhailer to deliver your protest
 15 message. That's correct, isn't it?
 16 A. I'm on the driveway. The car is coming past, yes.
 17 Q. And it's right we've seen you follow that car all the
 18 way to the carriageway? That's correct, isn't it?
 19 A. Yes. I mean, I don't know -- it's -- how was it? --
 20 15 foot. I'm going to the full extent of the road so
 21 I can use my megaphone and finish my sentence.
 22 Q. Interfering with her ability to access the carriageway?
 23 A. I don't think that's shown here, not proven, and
 24 I don't -- there may be some other times where I'm
 25 going, "Yeah, you know, it looks like it", but not here.

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1 Q. And standing in a position to the right of that vehicle
 2 that would obstruct her access on the highway because
 3 she couldn't see to the right?
 4 A. I don't accept that and I can't believe I'm involved in
 5 a multi-million-pound injunction going into minutiae of
 6 what could have been dealt with at the time by security
 7 or a police officer or anybody saying, "Listen, by doing
 8 that you're making a road traffic problem". We'd have
 9 worked around it.
 10 Q. The police officers, Mr Curtin, are trying to get the
 11 staff cars through the group at the moment, aren't they?
 12 A. No, they're not overwhelmed. They're relaxed. They've
 13 got their arms crossed. Surely they've got a general
 14 purpose role to look after the road users and
 15 everyone -- and us and the guards and the whole lot.
 16 Q. Well, let's look at the next one, Mr Curtin. If we can
 17 play on to three minutes and 47 seconds, please.
 18 (Video played)
 19 Again, you've moved close to the employee's car as
 20 it's trying to access the highway to deliver your
 21 protest message?
 22 A. I did what I did -- as with the other cars, I'm on
 23 a very small space. I'm -- yes, I want to be as near to
 24 that car as I can be because they're the ones I'm
 25 directing -- there's no members of the public around so

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1 I want them to hear me. I want the police to hear me
 2 and the guards to hear me as well.
 3 Q. If we look -- we can just about see your head still,
 4 can't we, through the crowd there? Do you see
 5 Mr Paterson? You're sort of further behind him,
 6 aren't you, in the distance there?
 7 A. That little shiny head, is that me? Yes, maybe, yes.
 8 Q. It's right, isn't it, you've followed that car actually
 9 onto the carriageway there, haven't you?
 10 A. You can't possibly --
 11 Q. Well, let's rewind it --
 12 A. Okay.
 13 Q. -- ten seconds, please.
 14 A. And if I had gone to the carriageway --
 15 MR JUSTICE NICKLIN: Let's watch it.
 16 (Video played)
 17 A. Where am I now? I can't see myself.
 18 MS BOLTON: There you are, Mr Curtin. You've followed that
 19 car onto the carriageway, haven't you?
 20 A. Can we play it again?
 21 Q. Yes, certainly.
 22 A. Where am I? I honestly don't know -- ah okay, yes,
 23 I can see me there. Okay, I've got me now. Where's
 24 the -- okay.
 25 (Video played)

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1 I don't want to accept that I'm on the road just to
 2 please you, so I'm saying that I don't know and I don't
 3 think I am, and if I was, then I was, but I don't -- I'm
 4 not prepared to accede to that. I'm not being
 5 difficult, but just why should I?
 6 Q. But you accept you've approached close to the car to
 7 deliver your protest message?
 8 A. Of course, yes.
 9 Q. And directing it at the driver of that vehicle?
 10 A. Yes, I want the driver to hear the words.
 11 Q. And you're interfering with their access on to the
 12 highway, aren't you?
 13 A. I'm protesting. I'm making noise. It's got to act as
 14 some level of distraction to a driver, hasn't it, you
 15 know?
 16 Q. And that's obstructing the driver's access to the
 17 highway, isn't it?
 18 A. You know, you make a better door than a window. If
 19 I stand between the car, whilst protesting, and the
 20 wrong place as far as -- but the driver must have a care
 21 of a duty for himself and they shouldn't drive out into
 22 the road. They could stop the vehicle and say,
 23 "Officer, I can't see what's bloody going on", and the
 24 officer has got to listen to that.
 25 Q. It's right, isn't it, that you're obstructing their

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1 access onto the highway?
 2 A. I'm not prepared to accept that from what you've shown
 3 me here.
 4 Q. Right. If we can play on and pause at four minutes and
 5 11 seconds, please.
 6 (Video played)
 7 Now, I just want to clarify with you, Mr Curtin,
 8 that's Mr Morley, isn't it, right in front of the
 9 vehicle -- the white vehicle there, the gentleman with
 10 the grey T-shirt on?
 11 A. If I may spend a minute or two --
 12 Q. Do you want us to rewind a little bit because he speaks?
 13 A. No, I was, under the advice of my sisters, going to ask
 14 or request for some acceptance from the court that I've
 15 had 40 years involved with activists and it's -- I've
 16 learnt in my life that -- we have a culture, if nothing
 17 else, within these -- it's such a no--no to mention other
 18 people. So I really, really, really, really, really,
 19 really am going to be -- bear with me -- I'm really
 20 going to be reluctant about casually, "Yes, that's
 21 Billy, that's Mary, that's Suni, oh, that's ...". This
 22 person is a named defendant.
 23 MR JUSTICE NICKLIN: All right.
 24 MS BOLTON: Mr Morley has agreed to an order, Mr Curtin.
 25 He's not --

1 A. I recognise that person -- yes, I recognise that person
 2 and I recognise that person as one of the named
 3 defendants. Can we -- because I do not want to be
 4 obstructive --
 5 Q. Well, I'm going to put to you it's Mr Morley --
 6 A. Okay, good.
 7 Q. -- and he's not moving out the way of the car at that
 8 moment. I might need to replay this for you --
 9 A. No.
 10 Q. -- but did you hear the words --
 11 A. I did.
 12 Q. -- "He hasn't asked me to move yet"?
 13 A. Yes.
 14 Q. The police officer is trying to get Mr Morley to move
 15 and he's giving that as the reason why he hasn't moved
 16 yet, isn't he? That's right, isn't it?
 17 A. That's -- yes.
 18 Q. It's right, isn't it, that this was what was typically
 19 happening before the injunction, that drivers were being
 20 asked to -- they were being required to ask the
 21 protestors to move, for them to get out of the way?
 22 A. My answer is it went through so many different
 23 manifestations. Each -- when I talked to the police
 24 liaison, sometimes it would be police that had never
 25 been there before and you'd have to begin the whole

1 conversation, "This is what tends to happen". This
 2 phase here, it was this person, who is a named
 3 defendant -- it seemed to be his idea that he could --
 4 he seems to, with some confidence, be able to stand in
 5 front of a vehicle and his idea of obstruction law at
 6 this point, which is being kind of tolerated by the
 7 police, is that, "He has to ask me to move out the way".
 8 Q. And that's consistent with what the staff said in their
 9 witness statements, that they were being required to ask
 10 for permission of some of the protestors to move out the
 11 way. That's what's going on there, isn't it?
 12 A. It's obviously what's going on there, yes. It is, yes.
 13 Q. Now, you're not, in this video, trying to encourage
 14 Mr Morley to move out of the way, are you?
 15 A. No.
 16 Q. You're not discussing with the police officer how you
 17 might get Mr Morley to move out of the way, are you?
 18 A. I'm not because it's -- the ritual is performing itself.
 19 There's no need for an intervention, which does mean
 20 this white car is held up.
 21 Q. If we can play the video and pause at five minutes and
 22 14 seconds, please.
 23 (Video played)
 24 Again, you're standing on the claimants' access land
 25 and you're directing your protest message up close at

1 the staff vehicle.
 2 A. That's correct.
 3 Q. If we can then play on to six minutes and three seconds,
 4 please.
 5 (Video played)
 6 Again, there, we can see you have followed that last
 7 car onto the highway, haven't you, shouting your protest
 8 message?
 9 A. Yes, I can actually -- you can actually see me sort of
 10 just catching the -- kind of -- yes, getting every --
 11 squeezing every bit of sound relationship of my voice,
 12 and the car driving -- yes, squeezing every last bit out
 13 till it drove off.
 14 Q. Now, I want to look at this from a different camera
 15 angle, Mr Curtin. If we could look at video 21, please.
 16 (Video played)
 17 If we could pause the video there, please. Now,
 18 do you see yourself on the right-hand side of that with
 19 the loudhailer?
 20 A. I do.
 21 Q. Right. Okay. If we can play the video now to two
 22 minutes and 14 seconds, please.
 23 (Video played)
 24 If we could stop there, please. We can see there
 25 that you followed that second car, that black car, right

1 up to the highway. The other protestors have moved out
 2 the way at that point, but you've tracked that car all
 3 the way onto the carriageway, haven't you?
 4 A. I think you're using some really colourful language
 5 to --- of me walking, taking a few steps. Remember, the
 6 other people, they seem to be engaged in definitely
 7 slowing the cars down. Yes, there's me on the ---
 8 "tracking" in such a small space, I think it's --- it's
 9 too colourful.
 10 Q. You've followed that car, delivering your protest
 11 message, and you're obstructing or interfering with that
 12 car's access to the highway ---
 13 A. No, I'm actually not.
 14 Q. --- because you're standing in a position that will
 15 obscure a driver's view?
 16 A. Not in this case. I don't accept that.
 17 Q. If we can play from two minutes, 35 seconds, to three
 18 minutes and eight seconds, please.
 19 (Video played)
 20 Pausing there for a second, we can see --- you've
 21 just stepped back with a police officer, but we can see
 22 that you've been shouting your protest message at the
 23 green car; yes?
 24 A. Yes.
 25 Q. If we can play on to three minutes and eight seconds,

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1 please.
 2 (Video played)
 3 Stop there a second. Again we can see you're now
 4 starting to walk to meet the car as it's going down the
 5 driveway.
 6 A. I think --- yes.
 7 Q. If we can play on to the three minutes and eight
 8 seconds, please.
 9 (Video played)
 10 Again, you're right on the edge, aren't you, between
 11 the end of the access road and the carriageway ---
 12 A. Yes ---
 13 Q. --- standing there, shouting your protest message, where
 14 it would obscure a driver's view to the right?
 15 A. I think in --- I'm not actually accepting --- I think I'm
 16 more behind the vehicle. I should have been more --- if
 17 I'd have wanted to --- if you're suggesting I wanted ---
 18 are you suggesting I want to interfere with these
 19 people's view because that's not what --- I didn't want.
 20 So, no, I'm sorry, I'm not being overly
 21 argumentative, but I think some nodding of the head
 22 could do it by the driver. But I'm standing --- I exist,
 23 I'm there as a protestor and you as a --- that person as
 24 the driver has got to negotiate their way out into the
 25 real world.

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1 Q. So it's the driver's problem if you're obscuring their
 2 view?
 3 A. Yes ---
 4 MR JUSTICE NICKLIN: That's likely to engender a debate
 5 rather than asking a question, so move to the next
 6 question.
 7 MS BOLTON: If we can play from three minutes and
 8 25 seconds, please, to three minutes and 35 seconds.
 9 (Video played)
 10 Again, we see the same. You're delivering your
 11 protest message to the white vehicle and you're
 12 standing --- following the white vehicle right to the
 13 edge of the carriageway. That's correct, isn't it?
 14 A. That's correct. I'm there and I'm at the edge, yes.
 15 Q. And you're interfering with their ability to access the
 16 highway?
 17 A. I think there's someone there with a placard. By the
 18 nature of the man with the placard --- well, I'm sure it
 19 wasn't their view either --- they're shining the placard
 20 at the road protestor. I'm not going to apologise for
 21 existing and I'm standing there and I'm not transparent,
 22 but it's not my aim to block any vehicle. It would
 23 never be in a million years.
 24 Q. But it's right, isn't it, Mr Curtin, that the person
 25 with the placard is much further back from the

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1 carriageway than you are?
 2 A. This site, the person is probably ---
 3 Q. Well, there are at least three people, aren't there?
 4 A. You can obscure the side --- the more you go to the side,
 5 actually, in this side, the more you obscure --- the
 6 further away --- like, there's a tall person on the
 7 right-hand side. Without knowing it, they'll be
 8 obstructing the highway probably worse than anyone else.
 9 Q. I'm suggesting to you, Mr Curtin, that you are
 10 obstructing or you're interfering with the person's
 11 right to access the highway.
 12 A. No. I utterly reject that.
 13 Q. If we can play from three minutes and 37 seconds to four
 14 minutes and 16 seconds, please.
 15 (Video played)
 16 We can see you there. Again, you've approached the
 17 car to deliver your protest message?
 18 A. Hmm---hmm.
 19 Q. We saw you then lean down to shout into the side window,
 20 didn't we, just before the car moved off onto the
 21 carriageway?
 22 A. Yes.
 23 Q. So it's right, isn't it, that yet again you're
 24 interfering with the car's ability to access the
 25 highway? You're right at the driver's side window.

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1 A. Yes, and by -- like you said, by doing that, I think
 2 that's going to -- I'm going to take up a bit more space
 3 of the driver's window. Like I said, what am I meant
 4 to -- it's as if you want me to apologise for being --
 5 I'm there, I'm loud, you can't miss me. The driver --
 6 I don't think drivers do have complete freedom in the
 7 universe to do as they wish. When things happen in the
 8 world, you have to take that into account as a driver.
 9 So that's more of a common sense approach to this than
 10 you wishing I wasn't there or the driver wishing
 11 I wasn't there.

12 Q. But you accept that you would be in the way of the
 13 driver's view of the highway to the right?

14 A. I accept I -- I don't want to be funny. I'm accepting
 15 I'm not transparent. The driver would have to -- might
 16 have to move their neck out or their head or, if they
 17 can't move -- they should not move onto a highway if
 18 they can't see. And if that had been relayed to anyone
 19 at the time, it would have been part of the police
 20 liaison procedure.

21 Q. Four minutes and 16 seconds to four minutes and
 22 32 seconds, please.

23 (Video played)

24 Can we stop there, please? We've just seen you
 25 stand in front of that vehicle, haven't we?

1 A. There's -- yes, you know, a slight movement to the --
 2 yes, to the -- yes.

3 Q. If we could play on, please, to four minutes and
 4 32 seconds.

5 (Video played)

6 We saw you do it again and then you've gone to the
 7 driver's side window, haven't you?

8 A. Yes.

9 Q. You're clearly interfering with that vehicle's ability
 10 to access the highway, aren't you?

11 A. I'll give the same answer, and in that case I am at the
 12 side of the road, now we can see it in a bit of scale,
 13 and because I'm not transparent, I must offer some
 14 obstacle to the person's view.

15 Q. Well, you've interfered in two ways there, haven't you,
 16 Mr Curtin? You've interfered, first of all, by standing
 17 in front of the vehicle and then by standing at the
 18 driver's side window. That's right, isn't it?

19 A. The car was stationary. I'll concede that Mr Curtin
 20 goes in front of that for some sort of nanosecond, but
 21 if you had something to worry about in terms of blocking
 22 your car, I don't think I'm your man in this scenario.

23 Q. And if we can go to four minutes, 33 seconds, to five
 24 minutes, 34 seconds, please.

25 (Video played)

1 And it's right, particularly with that last vehicle,
 2 we can see that you've stood in front of the vehicle,
 3 obstructing its access to the highway -- sorry,
 4 interfering with its access to the highway?

5 A. In this scene where there's been people standing in
 6 front of the car from -- it looks like on purpose, it --
 7 yes, I go in front of the car for a nanosecond, and
 8 then, as it's going -- like I said, that's the one where
 9 I appear to -- goodbye. There's a police car opposite.
 10 You can see that.

11 What you do see there -- look at the security
 12 guards. Why aren't they -- if road safety was an issue,
 13 they had every opportunity to be guiding the traffic
 14 out, to stop the traffic, to do something to help the
 15 drivers. The guards are doing absolutely nothing except
 16 imagining there's some force field in front of them.

17 Q. It's right that that was more than a nanosecond, wasn't
 18 it, Mr Curtin? You were stood in front of that
 19 vehicle --

20 A. No, I really wasn't. I went in front of the vehicle for
 21 whatever reason --

22 Q. And you then stepped to the side of that vehicle as it
 23 was trying to access the carriageway.

24 A. I did do that, yes.

25 Q. You were clearly interfering with the vehicle's access

1 to the highway?

2 A. Same answer to that. Because I'm not transparent and
 3 I'm there protesting what I considered -- what we all
 4 considered was part of the highway, then I'm allowed to
 5 protest on the highway. I'm allowed -- I get your point
 6 that it's wrong to endanger traffic and I don't think --
 7 for me, you've got to use common -- unless this person
 8 who is driving thinks, "That person shouldn't be there.
 9 They're obstructing my -- if they weren't there, I'd
 10 have a better view", and just being reckless and getting
 11 in a bad mood over there and not showing -- not driving
 12 onto that carriageway until it's safe -- there's nothing
 13 stopping any one of those drivers saying, "Officer, will
 14 you get a grip? I can't see either way".

15 Q. Let's look at video 22, please.

16 MR JUSTICE NICKLIN: Well, let's have our afternoon break
 17 there now, if possible.

18 Right. We'll come back at 3.25, please. Again,
 19 same rules, Mr Curtin. Don't discuss your evidence with
 20 anybody; all right?

21 A. Thank you.

22 (3.08 pm)

23 (A short break)

24 (3.25 pm)

25 MR JUSTICE NICKLIN: Ms Bolton, I've had a quick check

1 during the 15 minutes I've had to see if I can locate
 2 the evidence of Mr Hardy, where he says that Mr Curtin
 3 was blocking his view of the carriageway. I haven't
 4 been able to find it, so if you can help me at the end
 5 of the day with --- just email me later today with the
 6 relevant reference.
 7 MS BOLTON: My Lord, yes.
 8 MR JUSTICE NICKLIN: Thank you very much.
 9 MS BOLTON: Mr Curtin, I want to have a look now at
 10 video 22, please.
 11 (Video played)
 12 If we could pause there, please. This is the same
 13 incident but this is a different camera of the vehicles'
 14 access onto the highway; okay?
 15 A. Yes.
 16 Q. We've just seen the first staff car go, and that's you
 17 on the edge on the carriageway, isn't it?
 18 A. Yes.
 19 Q. Okay. If we can play on, please.
 20 (Video played)
 21 If we can stop there, we see that you've gone up to
 22 the driver's side window as they're accessing the
 23 highway.
 24 A. Yes.
 25 Q. If we can play on, please.

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1 (Video played)
 2 Again, if we can stop the video there, we can see
 3 again you're at the driver's side window as they're
 4 trying to access the carriageway; yes?
 5 A. Yes. Can I --- if for some strange reason I had
 6 deliberately wanted to block the view, I would have gone
 7 forward there. If I'd had had some crazy idea to try
 8 and make an accident happen, I'd deliberately stand
 9 a little bit towards --- further towards the bonnet.
 10 Q. Well, it's right, isn't it, Mr Curtin --- it's already
 11 quite narrow because we can see there's a vehicle parked
 12 on the left, then there's a trolley and a chair and
 13 a protestor with a dog. Then we've got another
 14 protestor to the left of the car. So the car already
 15 has quite a narrow access. You're quite close to it,
 16 aren't you?
 17 A. I am close to it, yes ---
 18 Q. The car is trying to access the carriageway and you are
 19 obscuring the driver's view there, aren't you?
 20 A. Again, because I don't --- I'm not being facetious but
 21 I'm not transparent. At this moment in my life I'm
 22 pleased I'm there, I'm pleased there's a protest going
 23 on. I'm not drawing any distinction at this point
 24 between the road and that drive because we all thought
 25 it was the highway. Sometimes in life I block people's

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1 views to things in the course of my daily life, and this
 2 is one of them.
 3 Q. Right. If we can play on, please.
 4 (Video played)
 5 A. Did you see that? The police officer speaks to that
 6 person there with the banners. She pointed something
 7 out to her. I don't know what.
 8 (Video played)
 9 Q. And again, if we stop, we can see you've actually
 10 followed the car onto the carriageway there,
 11 haven't you?
 12 A. Yes.
 13 Q. So, again, do you accept that you're obstructing the
 14 vehicle's view as it's accessing the highway?
 15 A. No. Because I'm not transparent, I am bound to have
 16 some --- yes --- sorry, yes, I'm not --- because I'm not
 17 see-through, that driver might have to move their head
 18 in some different angles than if I wasn't there.
 19 Q. Well, you're obstructing their view, aren't you?
 20 A. Well, of course I am. If --- I'm causing ---
 21 MR JUSTICE NICKLIN: Don't feel you have to be worn down,
 22 Mr Curtin. If you want to say, "I reject that
 23 suggestion. I'm not obstructing the view", you can say
 24 that.
 25 A. I'm definitely not wilfully obstructing. There's not

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1 one atom in my head and, as a police liaison type of
 2 person, it was not an issue. That was not running
 3 through my head and I actually don't think --- I actually
 4 don't believe I'm obstructing the view of that person so
 5 they can move out in the highway safely.
 6 Q. I'm going to ask the --- I'm going to suggest to you that
 7 you are obstructing their view and you're doing it
 8 whilst you're delivering your protest message.
 9 A. I reject that.
 10 Q. If we can play on, please.
 11 (Video played)
 12 If we stop there, please. Go back a few seconds,
 13 please. If you can play just for a few seconds, please.
 14 (Video played)
 15 And stop there, please. Again we can see that
 16 you're in the carriageway, aren't you?
 17 A. Yes.
 18 Q. And again you're standing at the driver's side window of
 19 that vehicle; yes?
 20 A. Yes.
 21 Q. And again you will be obscuring the driver's view as
 22 they are accessing the carriageway?
 23 A. Only to the point where I'm not transparent. I'm not
 24 attempting in any way to enlarge myself or cause this
 25 person to be obstructed, but by my presence I am being

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1 there.
 2 Q. And it's right that you're interfering with their access
 3 to the highway?
 4 A. Only in the fact that I'm there, and this can be dealt
 5 with by moving of the head, taking a bit more caution
 6 than you would do if I wasn't there.
 7 Q. And you're obstructing their access to the highway?
 8 A. Only in the fact that I'm not transparent; only in
 9 a natural cause of events?
 10 Q. It's right, isn't it, that you're deliberately there
 11 because you're standing there determined to deliver your
 12 protest message?
 13 A. That bit is correct, yes, that I'm there to deliver the
 14 protest.
 15 Q. Okay. If we could play on, please.
 16 (Video played)
 17 If we pause. Again we can see that that's held up
 18 the vehicle that's just coming into view there.
 19 A. Yes. The vehicle has slowed down, thank God, and people
 20 are acknowledging that road protestors obviously — you
 21 can't just drive round as if they're not a protest.
 22 That's what you seem to be suggesting, that we should
 23 vapourise and not be there. I'm glad there's people
 24 there.
 25 Q. If we can play on, please.

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1 (Video played)
 2 And, again, if we can pause there. You're clearly
 3 very close to this vehicle, aren't you, Mr Curtin?
 4 A. Yes.
 5 Q. And it's right that, again, you're just entering the
 6 carriageway as the vehicle is trying to access the
 7 carriageway?
 8 A. Yes, I go onto the carriageway whilst being close to the
 9 car, yes.
 10 Q. And it's right you would be obscuring the vehicle's view
 11 to the right?
 12 A. In the sense that I'm not transparent, of course they
 13 can't see straight through me.
 14 Q. And it's right, isn't it, that you're deliberately
 15 standing there to deliver your protest message?
 16 A. I'm definitely delivering — standing there with the
 17 deliberate idea of protesting, yes.
 18 Q. And you're interfering with their right to access the
 19 highway?
 20 A. If — because I am there by —
 21 Q. Because you're standing there obscuring their view?
 22 A. I'm not setting out to interfere with their use of the
 23 highway. I'm accepting there's a protest and, because
 24 of the protest, everyone is going to have to adjust to
 25 this situation.

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1 Q. And you're obstructing their access to the highway by
 2 standing in the way of their view to the right?
 3 A. Absolutely no, I'm not.
 4 MR JUSTICE NICKLIN: Which vehicle is that?
 5 MS BOLTON: My Lord, I'm just double-checking I've got the
 6 right car.
 7 MR JUSTICE NICKLIN: Well, it's not a white Ford.
 8 MS BOLTON: No, my Lord.
 9 MR JUSTICE NICKLIN: It's not a white Mercedes. It's not
 10 a yellow Ford car.
 11 MS BOLTON: We think it might be a Churchill employee,
 12 my Lord. Apologies. It's not a staff car.
 13 Can we play on, please?
 14 (Video played)
 15 Again, if we can pause there. My Lord, that's
 16 Employee P's car. Again, Mr Curtin, we can see you've
 17 entered quite a bit of the carriageway there,
 18 haven't you, following that car?
 19 A. I've gone onto the carriageway, yes.
 20 Q. And you're obscuring that car's view to the right?
 21 A. Because I'm not transparent.
 22 Q. While standing on the carriageway?
 23 A. Yes.
 24 Q. It's right, isn't it, that you're standing there
 25 deliberately to deliver your protest message?

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1 A. Yes.
 2 Q. And it's right, isn't it, that you're obstructing that
 3 driver's view to the right?
 4 A. There's other people around waving posters. Some
 5 people — this driver — I would say this driver needs
 6 to take into account what's going on around, and if you
 7 were in the case of this driver, I would say you are
 8 being allowed to navigate that road, albeit a bit
 9 differently to what you're used to, but there is an
 10 access road out and you just have to navigate —
 11 negotiate in the real world what's in front of you.
 12 Q. You're interfering with the driver's view to the right
 13 of the carriageway on a busy road, aren't you?
 14 A. I am existing, I am protesting and I thank God that I'm
 15 there doing that.
 16 Q. You're obscuring the driver's view to the right where
 17 you're standing, aren't you?
 18 A. Again, I refer you to the same answer. By not being
 19 transparent, it's absolutely not my intention — it
 20 would have been a classic bit of police liaison for the
 21 police to go, "Whoa, let's stop this right here. This
 22 isn't going to carry on", in which case the protestors
 23 would have negotiated something. The last thing I want
 24 to do is cause an accident. I've stood on that road —
 25 you know, me on that road there — the amount of times

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1 I've stood on the road, screaming at people, "Get off
 2 the road, get off the road", and we haven't had an
 3 accident and I'm delighted for that. It's my first day
 4 there and -- yes, I'm protesting and, yes, I'm not
 5 obstructing the highway.
 6 Q. It's right, isn't it, Mr Curtin, that you are
 7 obstructing the highway because you're obstructing the
 8 vehicle's view to the right?
 9 A. I'm only a small person. The driver, they need to move
 10 their head perhaps because I'm there. Because of me
 11 being there, they have not got an unobstructed totally
 12 clear view, but I'm allowed -- I need -- the protestors
 13 have got as much right to use a road as any pedestrian
 14 or any user of a road -- any car driver. I've got as
 15 much right to be on that road as a protestor, to some
 16 degree, as that car driver, I feel.
 17 Q. Well, that's a matter for submission, Mr Curtin, but
 18 I'll put to you that it is deliberate because you've
 19 deliberately gone to that window, into the carriageway,
 20 to deliver your protest message. You are deliberately
 21 standing by that vehicle's driver side window.
 22 A. I'm deliberately standing close to that car, yes.
 23 Q. And you are doing so -- sorry, and by doing so, you are
 24 obstructing that driver's view to the right.
 25 A. Because I'm not -- because I'm a protestor, because I'm

1 near the car, deliberately near the car, that is going
 2 to be one of the consequences, but that driver also has
 3 to take their part in this -- what's happening.
 4 Q. And that's interfering with the driver's right to access
 5 the highway and it's obstructing the driver on the
 6 highway?
 7 A. My aim here is to protest and only protest and do it
 8 safely and do it legally and do it well.
 9 Q. Now, this incident was not only before any injunction
 10 but it was also before anyone had been served of any
 11 notice of any injunction proceedings, wasn't it?
 12 A. Yes.
 13 Q. At no point in this video do you attempt to facilitate
 14 the staff leaving the site, do you?
 15 A. These are early days. I think that could be perhaps
 16 a day after I got there, so within the first few days.
 17 But, no, for me the ritual is underway already and I'd
 18 be -- from what I gathered, from the level of anger that
 19 there is, this -- to me, it went well. The ritual went
 20 well on this occasion.
 21 Q. And it's right, isn't it, that we can see that you've
 22 targeted each car as it's attempted to access the
 23 highway? That's correct, isn't it?
 24 A. Yes, as long as "targeted" hasn't got another meaning;
 25 "You're a car driver, I want you to hear ...".

1 Q. Well, you're particularly wanting to target the staff of
 2 MBR, weren't you?
 3 A. Only, yes -- ah, not only. But there's no pedestrians
 4 here and the passing cars, if they're held up in the
 5 traffic, then they become a captive audience.
 6 Q. Yes, but you're shouting your protest message at the
 7 cars leaving the Wyton site?
 8 A. Yes, I'm on the megaphone -- also for the -- I'm just
 9 there, I'm sort of educating perhaps other protestors of
 10 like -- I'm saying some -- I'm not going down the road
 11 "You monster, we're going to get you" or whatever. I'm
 12 saying, "Is this what you wanted to do at school?
 13 Are you going to wash this dirt away? No, you won't be
 14 able to". Some of it is for the ears of the protestors
 15 who have maybe never been on a protest before.
 16 Q. It's right, isn't it, that -- it's obvious that if you
 17 follow staff members in their car onto the carriageway,
 18 shouting your protest message through a megaphone and
 19 obscuring their view, that you're going to cause them
 20 distress?
 21 A. That's a fantastic massive bit of speculation that's
 22 completely not shared by the visible action of any
 23 police officer. I understand what you're saying. In
 24 the ideal world this scenario could cause an accident --
 25 Q. Yes.

1 A. -- but we go through life not in a perfect
 2 Stepford Wives existence where things happen.
 3 Q. And a staff member, desperate to get away from people
 4 surrounding their car -- and, as Employee B described to
 5 you, being a woman in a car on her own -- she gave you
 6 that example -- with somebody shouting through
 7 a megaphone whilst she's trying to access the
 8 carriageway -- and she explained to you how that felt.
 9 That's very distressing. That's a reasonable way to
 10 feel in that situation, isn't it?
 11 A. I never have attempted to take over whatever people
 12 feel, but, remember, these people, for me and the other
 13 people and a sizeable proportion -- they're puppy
 14 killers. They're involved in a real controversial
 15 project. They're going home, leaving the dogs behind,
 16 et cetera. So this isn't a potato factory. If this was
 17 a potato factory and it was some personal dispute with
 18 the potato factory, you could say, "You're just being
 19 awkward out here. Look at you", but there's a high
 20 level of passion and controversy and ...
 21 Q. And it's designed, isn't it, to cause them distress?
 22 A. No.
 23 Q. It is designed to coerce them to leave their job,
 24 isn't it?
 25 A. Absolutely no coercion whatsoever.

1 Q. Which is why one of the things that you shout at them is
 2 to get a different job --
 3 A. Ah, it's an invitation .
 4 Q. -- leave their job; "When will you leave?".
 5 A. Yes, those are open invitations -- if you listen to
 6 them -- if I may talk too much, when I did a previous
 7 campaign at the Huntingdon laboratory, not part of
 8 SHAC -- we'll come to that -- I read a book by
 9 Paul McKenna, the hypnotist. It had a flashy silver
 10 cover on it and it explained what hypnotism is, and we
 11 all think it's like forcing people to do things.
 12 It gives an example -- a classic case of hypnotism,
 13 if you want your children to go to bed, rather than
 14 going through a ritual -- if you want them to go to bed
 15 at 8 o'clock, here's the game -- this is hypnotism --
 16 you give them a choice, "Do you want to go to bed at
 17 7.30 or do you want to go to bed at 8 o'clock?", and
 18 they elect 8 o'clock. So I feel I'm letting myself down
 19 if I was like, "You must leave your job". I don't know
 20 if I'm -- in the course of the evidence, if I go down
 21 the road. I hope not. This is an invitation . This is
 22 empowering these people that they don't have to work
 23 here and that there's another world out there beyond
 24 this atrocious -- what for me and other people is
 25 a really , really bad place to work.

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1 Q. You're targeting them to try and coerce them to leave
 2 their job?
 3 A. If they were to leave their job, I'd be pleased for
 4 them, but there's no coercion, there's no intimidation,
 5 absolutely none.
 6 Q. And you're doing so because it's your desire to see MBR
 7 close down and you want the staff to leave to force MBR
 8 to close down?
 9 A. Nowhere in my evidence have I said that. Nowhere in my
 10 evidence have I said that the idea was to get all the
 11 staff to leave so there would be no one to work there.
 12 That's not my vision of how to shut down this massive
 13 American multi-national. If it had have been and I'd
 14 have conducted that course, whoa, the campaign would be
 15 a completely different thing to what it is .
 16 Q. Well, I'm going to put it to you, Mr Curtin, that the
 17 reason why you are targeting the staff is to convince
 18 them to leave.
 19 A. No, there's many reasons why I wanted direct comments to
 20 this: to get through to them, to be a protestor; to let
 21 them know that it's not okay in the eyes of many people,
 22 and if they were to leave that job, they won't have to
 23 listen and won't have to wake up in their nightmares to
 24 dogs crying. So it's an open invitation . It's saying,
 25 "This is a bad place. Get the hell out of here for your

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1 own good and the dogs' good".
 2 Q. It's an open invitation, right.
 3 Another incident that took place on 13 July -- it
 4 took place in the morning. I want to look at video 18,
 5 please. So this is earlier the same day when the staff
 6 were coming to work.
 7 A. Yes.
 8 (Video played)
 9 Q. If we just stop for a moment, that's you approaching the
 10 black car, isn't it?
 11 A. Not yet, no. I'm not approaching the car.
 12 Q. But that's you, isn't it, by the cone --
 13 A. Yes.
 14 Q. -- moving generally towards the black car; yes?
 15 A. Yes.
 16 Q. Right. We can play on, please.
 17 (Video played)
 18 If we can stop there, we can obviously see there's
 19 quite a queue of traffic building up along the highway,
 20 isn't there, because the cars are having to stop on the
 21 highway.
 22 A. Absolutely, yes. This is 8 o'clock in the morning, yes,
 23 so a busy road at this time.
 24 Q. Okay. If we can play on, please.
 25 (Video played)

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1 Again we see you delivering your protest message to
 2 each of the vehicles, don't we?
 3 A. Yes.
 4 Q. Do you accept that?
 5 A. Yes.
 6 Q. Play on, please.
 7 (Video played)
 8 Pause there. We can also see that where they're
 9 having to turn in is quite narrow because, between you
 10 on the one side -- and we've got protestors on the other
 11 side and in front of the cars, so they don't have the
 12 whole of the access road, do they?
 13 A. That's correct.
 14 Q. Okay. We can carry on, please.
 15 (Video played)
 16 A. I should like to add, if I can, this appears to be
 17 a convoy already, doesn't it? I've been sitting here
 18 listening to the evidence, thinking the convoy was going
 19 to come bit later than this, but the convoy is already
 20 set up.
 21 (Video played)
 22 Q. Right. So you've approached every one of those
 23 vehicles, haven't you, as it's come in?
 24 A. Yes.
 25 Q. Right. Let's have a look, please, at video 20. If you

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1 can play the first 19 seconds, please.
 2 A. Is this the same day?
 3 Q. Yes, same incident.
 4 (Video played)
 5 So we can see there, can't we, that the staff car
 6 has come to a complete stop?
 7 A. A complete stop, yes.
 8 Q. Okay. If we can play on, please.
 9 (Video played)
 10 And if we can stop there, please. Would you accept,
 11 Mr Curtin -- we can go through it, if you like, and
 12 I don't know if you've had a chance to review this
 13 video -- but would you accept that every vehicle has to
 14 come to a complete stop or do you want me to play it?
 15 A. Yes, albeit of a really, really -- I'd say a kind of --
 16 because it's ritual based, a kind of obvious temporary
 17 stop -- yes, each vehicle had to stop --
 18 Q. Thank you.
 19 A. -- including some of the cars on the road.
 20 Q. Right. If we look at video 46, please, we've got the
 21 audio, and if we could look at it from one minute and
 22 eight seconds to one minute and 38 seconds, please.
 23 A. Okay. I haven't got a picture. Ah, good. Is this the
 24 same incident?
 25 Q. Yes. So if we can play from one minute and eight

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1 seconds, please.
 2 A. Okay.
 3 (Video played)
 4 Q. Can you just rewind that, please, to one minute and
 5 eight seconds and play that again, please?
 6 (Video played)
 7 Right. Stop there, please. That's you shouting in
 8 the background on the loudhailer, "Remember when you
 9 applied for the job?"
 10 A. Yes.
 11 Q. And then you say -- correct me if I'm wrong -- "You
 12 didn't know what was coming for you". Would you like me
 13 to rewind it again?
 14 A. No, I can -- because I know my thought process and I can
 15 explain the words. So, yes, yes, I can -- yes, that
 16 would be -- yes. What did you say, "You didn't know
 17 what ..."?
 18 Q. "... was coming for you".
 19 A. Let's look at that, "was coming for you", just in case
 20 there's some sinister meaning to that.
 21 Q. Let's play it back. Well, it might be good to play it
 22 past that. We can always rewind it again. So let's
 23 play it again.
 24 A. From the -- yes, from there.
 25 (Video played)

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1 Q. "You had no idea what was coming for you", wasn't it?
 2 A. I'll go as far as the "You had no idea what was coming
 3 ... " -- I don't know if it was "for you", "to you", you
 4 might be able to hear, but I can give an explanation to
 5 my thought process if you want.
 6 Q. That's consistent, that message, isn't it --
 7 A. Yes.
 8 Q. -- with trying to coerce --
 9 A. No.
 10 Q. -- staff to leave their job?
 11 A. Do you want me to give you the thought process of that?
 12 Q. Well, I'm asking you. It's consistent, isn't it, with
 13 coercing staff to leave their job?
 14 A. I can -- "Do you remember the day when you applied for
 15 the job? Do you remember what you were told? Do you
 16 remember -- do you want to learn a qualification of how
 17 to look after animals?"
 18 Q. "You had no idea what was coming for you", that's not --
 19 A. Yes, yes. When -- distantly, before you'd been to the
 20 site, when you go to the Job Centre, when you look on
 21 the ad, it looks good, "Do you want to come and learn
 22 how to look after dogs?". This was at a time -- and
 23 it's only -- it's changed with the evidence really -- my
 24 presumption was that, like the laboratory up the road,
 25 they go through a lot of staff, a lot of young staff,

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1 but that doesn't seem to be the case at MBR. They seem
 2 to -- the workers are -- once they find a worker that
 3 will do it, they last for an extremely long time.
 4 So without -- this sentence is kind of wasted --
 5 I don't know who these people are, anyway, but for the
 6 long -- it's not aimed at the people who have been there
 7 20/30 years. It's too distant a memory. It's based on
 8 people who -- I thought, "This is going to be a high
 9 level of really casual labour", and I'm sure they do
 10 have that element too, and it was aimed for them. And
 11 "Do you remember ..." -- it's an invitation that, "You
 12 must have maybe cared about animals to go for the job.
 13 Do you want to learn after a job application? Now --
 14 now you're here -- is there a dissonance with that?"
 15 So, yes, it's to get into people's heads.
 16 Q. Let's play on.
 17 (Video played)
 18 Pausing there. "Nobody loves a dog killer".
 19 A. Yes.
 20 Q. Again that's you coercing the staff to leave their job,
 21 isn't it?
 22 A. It's not. It's me, based on a lifetime of how unpopular
 23 it can be, normally, to -- that's the one -- remember
 24 the woman who put the cat -- it's bad enough to do it to
 25 a cat -- put the cat in the bin.

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1 Q. That's what you're telling, "Nobody loves a dog killer";
 2 "Leave your job", effectively. That's what this message
 3 is about. You're telling them that nobody likes them
 4 because of what they do. You're trying to coerce them
 5 not to continue to work for MBR.
 6 A. That's -- I want to give them a reality check. You
 7 might tell yourself amongst your insulated gang that
 8 everything is okay, but it's not okay and it's not
 9 normal. This isn't a normal dog place. It's
 10 extraordinary.
 11 Q. Let's play on.
 12 (Video played)
 13 Pause there, "This company is using you".
 14 A. "This company is using you".
 15 Q. You're trying to coerce them to leave their job?
 16 A. I'm trying to challenge their opinion, that from what
 17 they -- what I imagine -- I've got no idea -- this
 18 company has told them, that, "We are part of
 19 a ground-breaking team, doing pioneering research",
 20 whereas the reality is it's a company that I can't --
 21 a horrible, nasty, money-making American multi-national
 22 that's -- I thought at the time -- and I've changed my
 23 view during this -- that we're dealing with some naive
 24 kids and that's who I think I'm speaking to, but I was
 25 wrong.

1 Q. Can we play on, please?
 2 (Video played)
 3 Stop there, please. So it's right, isn't it, that,
 4 again, each -- you've delivered your protest message to
 5 each staff car driver? That's correct, isn't it?
 6 A. I hope so, yes.
 7 Q. You've been part of an obstruction on the highway there,
 8 in slowing those cars and bringing them to a stop on the
 9 highway?
 10 A. I accepted that each car was indeed stopped because
 11 there was a demonstration going on -- taking place.
 12 There was people in the driveway, so if they hadn't
 13 stopped, they would have ran into people. This is
 14 a real world where there's a protest. When you see
 15 a protest and you see a police car, you have to
 16 co-ordinate. You make sure where your foot is, near the
 17 brake, et cetera, when you're approaching what's
 18 a potential hazard.
 19 Q. It's plain that your actions were deliberate. You
 20 intended to stand in the carriageway, you intended to
 21 slow those cars down, you intended to shout at them.
 22 That's correct, isn't it?
 23 A. I intended to demonstrate and, at this point, before we
 24 knew about the yellow line and the driveway, I was
 25 treating it as part of the highway so I was drawing no

1 distinction between the actual highway really and the
 2 drive, except to go out onto the road, be careful, you
 3 know. But if all the traffic -- all the traffic was
 4 stopped. But I am not transparent, you know. So when
 5 I'm there, I am there, and I'm proud I was there, I'm
 6 glad I was there and I was demonstrating and -- this is
 7 a very controversial place. These workers were -- this
 8 was the beginning of Camp Beagle and we just -- we
 9 wanted to take away the normality that you're asking me
 10 to accept, that these cars just drive out as if nothing
 11 is happening. There is a protest so the drivers must
 12 act accordingly.
 13 Q. Yes, Mr Curtin, and it's right, isn't it, that you
 14 deliberately stepped onto the carriageway as part of
 15 a group of protestors who were intent on slowing those
 16 cars down and obstructing them?
 17 A. The cars were going to get slowed down, as you can see,
 18 by the other people who were standing in front of the
 19 car -- who were. I'm there to keep a lid on it and I'm
 20 accepting there's some -- and you're not accepting that
 21 we shouldn't live in a world where anyone ever is
 22 impeded by any protest, and that's not the -- I've never
 23 lived in that world. It's as if you want me to go away
 24 and vanish.
 25 Q. Well, Mr Curtin, if you were standing there to keep

1 a lid on it, you could have stood on the grass verge and
 2 done that, couldn't you?
 3 A. I wanted to be -- at all times it was negotiation.
 4 I know which side of the fence I'm on. These are my
 5 people, these are my protestors, so I'm doing as much as
 6 I can now. You know, I'm not -- no, I'm not -- of all
 7 the people there, I'm doing probably the least
 8 obstruction. Apart from, like you said, no one else is
 9 standing next to the driver's door when they're about to
 10 hit the road, but I was not doing that in order to block
 11 their --
 12 Q. But you were part of this obstruction, weren't you,
 13 Mr Curtin?
 14 A. Yes, I was part of that demonstration and, because of
 15 that demonstration, the cars did not get out as quick as
 16 if they had -- as if we weren't there.
 17 Q. And that was your intention, to be part of that
 18 obstruction?
 19 A. My intention was to have more impact than you're
 20 suggesting, that we all should have gone away from some
 21 area and then passively watched the vehicle. So it was
 22 my intention to facilitate what was already happening
 23 and make sure that no one gets hurt.
 24 Q. And not only was it deliberate to obstruct the vehicle
 25 on the highway, each of those vehicles on the highway,

1 but it's also right, isn't it, that it would have been
 2 perfectly reasonable for a driver who was being stopped
 3 on the carriageway and approached by someone with
 4 a loudhailer to feel distressed by your actions?
 5 A. No, no, to have some agitation, but to be distressed
 6 would be -- no, because that -- distress would be like,
 7 I'd say, "Oh, my God, I can't move. I'm going to be
 8 blocked in for hours". The police are there, so
 9 a person -- some normal reasonable person should get
 10 what's going on and it's a -- I'd say -- I'm not
 11 belittling it, but there's frustration and annoyance.
 12 I fully understand why the MBR workers would be annoyed
 13 at us.
 14 Q. And as they gave evidence, they were distressed by
 15 people surrounding their cars, approaching their cars,
 16 shouting at them with loudhailers whilst sitting in
 17 their cars?
 18 A. There are other people shouting things --
 19 Q. It's right, isn't it --
 20 A. There are other people saying things to the workers,
 21 like one said "You smug bitch" or something like that.
 22 Nothing like that has come out of my mouth. No one
 23 should be distressed -- well, they can be distressed if
 24 they want, but then I would challenge that, "You really
 25 are working in this place and you really, really,

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1 really, really think there shouldn't be any protesting
 2 at all", apart from what -- going away and some -- if
 3 I may call it "Stepford Wives" -- some idealised,
 4 sanitised Chinese -- sorry to mention China in this type
 5 of basis -- but, you know, some state-sanctioned diluted
 6 non-event. I'm a protestor.
 7 Q. And it's right, isn't it, Mr Curtin, that you took this
 8 action, stepping into the carriageway and shouting at
 9 each of those staff cars, to coerce those staff to leave
 10 their job at MBR?
 11 A. I've given you my answers on that already. No coercion.
 12 I've been involved with campaigns in the past that have
 13 used coercion. When I say "the past", I mean the
 14 distant past, so I know what the word "coercion" means.
 15 Q. I'm going to look at another incident, Mr Curtin, which
 16 occurred on 17 July 2021. We need to look at video 170
 17 for this one, please. If we can play -- if we can pause
 18 at 17 seconds, please.
 19 (Video played)
 20 A. Can I help the judge? The police officer there, she's
 21 the same one -- she was the same one in the last one and
 22 she's probably with her colleague. I remember her in
 23 particular because I got on particularly well with her.
 24 She's a local policewoman, a local bobby, I think, and
 25 she used to be down -- is this a morning? It's

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1 a Saturday probably. She'd be down there all the time
 2 and acting in an unfazed way and sort of yawn, yawn,
 3 not -- but she was pleasant. She kind of got part of
 4 it.
 5 Q. Right. If we can play to 17 seconds, please.
 6 (Video played)
 7 Now, I'm not asking -- there's a gentleman there
 8 holding a flag --
 9 A. Yes.
 10 Q. -- who I believe is Mr Morley, and then there's you,
 11 isn't there, in the high visibility jacket?
 12 A. Yes.
 13 Q. You've either got an item of clothing or a towel or
 14 something on your head?
 15 A. Yes.
 16 Q. Okay? So you can see yourself there. In a moment
 17 you're going to come over to the gate and start taking
 18 down the banners with Mr Morley, so let's play to one
 19 minute and 11 seconds, please.
 20 (Video played)
 21 Now, you there are encouraging people to shout at
 22 the staff. You're saying, "They're not ordinary
 23 people", and you're encouraging the protestors to target
 24 the staff.
 25 A. I've got no idea where you get that from. I am shouting

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1 with the megaphone that this is -- I don't know if they
 2 say they're not normal people. They're --
 3 Q. Let's play it back, Mr Curtin. If we can go back about
 4 30 seconds, please.
 5 A. And I may say it, but they'd be normal people in an
 6 abnormal place.
 7 Q. Ordinary. A little bit further, please -- just a few
 8 seconds. Play it there, thank you.
 9 (Video played)
 10 Pause there. So you're explaining that you're not
 11 going to shout at people in the street in the middle of
 12 Huntingdon.
 13 A. Yes, I'm giving the people some scenario because my
 14 understanding of life, if you gathered on the streets of
 15 Huntingdon and started shouting at people, without
 16 understanding what's going on, that would -- you'd run
 17 yourself very near -- you'd get arrested probably, if
 18 you did what we did.
 19 Q. Right.
 20 A. Yes, that's my understanding.
 21 Q. If we can play on, please.
 22 (Video played)
 23 A. "Keep away from the personal abuse", do you hear that?
 24 Q. Yes, you're talking about the workers. Is there any
 25 chance we can increase the sound a bit because I can

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1 normally hear this video a bit better.
 2 THE EPE OPERATOR: Sorry (inaudible).
 3 A. I'd suggest it's not --- it's hard to get a perfect
 4 script on this.
 5 MS BOLTON: My Lord, I'm not sure how well you're hearing
 6 the audio on this one because I'm not hearing it very
 7 well at all.
 8 MR JUSTICE NICKLIN: But if it's important, what he says,
 9 then it really needed to be transcribed so you could say
 10 to Mr Curtin, "This is what you said, didn't you?", and
 11 then Mr Curtin can dispute that, if he does. I don't
 12 really want to spend a large part of this trial having
 13 to try and work out what somebody is saying. If you
 14 attach importance to the words that he says, then ---
 15 well, arguably, if it's part of a harassment case, it
 16 should have been pleaded, number one; number two, if
 17 that's important, we need to find a way of crystallising
 18 that in the evidence.
 19 MS BOLTON: My Lord, apologies. When we've played this in
 20 the past it's been very clear so I do apologise. We
 21 didn't think we'd need to.
 22 If we can play on, please.
 23 (Video played)
 24 We can stop there. So we've got a group of people
 25 right in front of the cars and then you're in the middle

1 of the access road towards the carriageway again,
 2 aren't you?
 3 A. Yes, I'm --- yes, yes. Yes.
 4 Q. And if we can play to two minutes and 41 seconds,
 5 please.
 6 (Video played)
 7 A. If I was --- sorry, if I was sitting down there and I was
 8 my own barrister, I would object to the way you're
 9 cherry-picking --- you're waiting --- you're not picking
 10 up on me, Mr Curtin, saying, "Keep it about the dogs.
 11 Don't make it personal", saying that the dogs --- making
 12 animal welfare complaints. They're leaving, the entire
 13 workforce now, and it's not even 12 o'clock, and you're
 14 cherry picking my comments and you're deliberately not
 15 picking up on what's really positive comments from me.
 16 You're just going for --- when you can, when there's
 17 a negative spin and you're not reflecting the evidence
 18 as it is.
 19 Q. Mr Curtin, this is the pleaded case against you that you
 20 have had an opportunity to challenge everybody on. If
 21 we can just carry on, please, to two minutes and
 22 41 seconds.
 23 (Video played)
 24 We can stop there. You've now come onto the access
 25 land, the claimants' land, and you're standing right in

1 front of the yellow vehicle, aren't you, and you're
 2 speaking to the protestors?
 3 A. Yes, it's like a deliberate act by me. I'm over there,
 4 I'm at the far side, sort of --- so energy is going to
 5 drift this way. There's a bit of instruction. The
 6 policewoman is just about --- she is just about to get
 7 some momentum on the go, so I then decide to go near the
 8 front and there's no way I'm going to go for a stand-off
 9 in this situation here. All my movements now are going
 10 to be towards the road and --- in the hope that everyone
 11 else is going to shuffle back as well.
 12 Q. And it's right, isn't it, that you're on the claimants'
 13 land?
 14 A. Now I know that.
 15 Q. And you've not been invited onto that land by the
 16 claimant, have you?
 17 A. Me, the police officers, the security guards, you --- not
 18 you, but by the time we come to the court --- this is
 19 only a recent issue. The whole --- no one at that point
 20 was --- so I was not --- I was not to know it was the
 21 claimants' land. If I had, I wouldn't be standing on it
 22 probably because ---
 23 Q. Okay. If we can play to three minutes and 40 seconds,
 24 please.
 25 (Video played)

1 A. Look at my movement. Look.
 2 Q. If we can continue to play, please.
 3 A. Yes.
 4 (Video played)
 5 Q. Now, you can see there that the white car there, that's
 6 Employee F's car ---
 7 A. Okay.
 8 Q. --- and he's trying to access the highway. If we can
 9 play on a little bit more, please.
 10 (Video played)
 11 Stop there. We've got the police officer trying to
 12 assist the car coming out and you're behind the police
 13 officer, aren't you, in the middle of the access road?
 14 A. I am, yes.
 15 Q. Play on, please.
 16 (Video played)
 17 If we can stop there, please. So you've obstructed
 18 that vehicle as it's trying to access the highway,
 19 haven't you?
 20 A. It's my evidence that I've facilitated. If anything,
 21 I helped that vehicle get out. If you look at the
 22 times, 11.45, it's on a Saturday, it's a boiling hot
 23 day. This is only two weeks into the campaign and this
 24 would probably --- if I wasn't there, I'd think the scene
 25 would be a lot angrier and the idea of --- I mentioned it

1 in my evidence -- why should they go home at 11 o'clock?
 2 So I do not feel that, because I was there, those
 3 vehicles got obstructed. It would be my evidence the
 4 opposite actually, that because I was there, those cars
 5 got out quicker than what they would have done if
 6 I hadn't been there.
 7 Q. If we can go back to three minutes, 40, please. We can
 8 just see your hi-vis jacket at the back there, can't we?
 9 A. Yes.
 10 Q. If we can play again, please, to three minutes, 52.
 11 (Video played)
 12 So you're standing to the right of the lady with the
 13 ginger hair. We just see the megaphone behind her.
 14 A. Yes.
 15 Q. You're actually in the car's path at the moment,
 16 aren't you?
 17 A. No way. If he runs over the nice policewoman and the
 18 other protestors, I would be in his way. The big
 19 problem is that speed bump. The police officers -- that
 20 speed bump, and it's the sort of thing that can
 21 massively kick off. Imagine that car -- and it nearly
 22 does -- it comes -- it nearly does come into contact
 23 with a protestor, that's the sort of incident that can
 24 blow out of all proportion extremely quickly and it's
 25 the sort of incident that I was desperate -- yes,

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1 desperate to kind of make not happen. Remember, I've
 2 had a friend that was killed, run over, during
 3 a protest.
 4 Q. We're going to look at this from another angle in
 5 a minute, Mr Curtin, but let's just -- if we can play
 6 from three minutes, 52, to four minutes and nine
 7 seconds, please.
 8 (Video played)
 9 Pausing there, again you've moved more into the
 10 middle of the access road, haven't you?
 11 A. You -- you know, sometimes I don't know if we're looking
 12 at the same video. I've moved back and I'm keeping an
 13 eye on -- to be honest, it's like I'm a copper and I'm
 14 working with that policewoman. That's honestly how
 15 I think I'm behaving at that time.
 16 Q. And if we can play on to four minutes and nine seconds,
 17 please.
 18 (Video played)
 19 If we stop there, please, again you've moved
 20 forwards towards the car, haven't you?
 21 A. Yes, and the policewoman is dealing with -- because,
 22 remember, the car kind of lunged and it's that then that
 23 can explode -- just keeping an eye, making sure, having
 24 a nose -- making sure that she's all right and that
 25 everything is all right.

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1 Q. Well, that's because, as we can see, the car is trying
 2 to go over the ramp, isn't it, and there's people in the
 3 way, which has caused -- as the car is meant to go over
 4 the ramp, it's --
 5 A. Yes, and there's a bit where -- once it comes over, even
 6 if the car didn't want to, there's a bit of -- yes, it's
 7 a bit of an obstruction, blockage, by itself.
 8 Q. Now, if we can just watch the rest of the incident of
 9 this car accessing the highway, so if we can play on,
 10 please.
 11 (Video played)
 12 A. Would you say the police officer is blocking the road
 13 there? I would.
 14 Q. So you've ... if we can stop that video there, please.
 15 If we can have a look at video 25, please.
 16 (Video played)
 17 Now, if we can pause there, please. Now, this is
 18 the same incident --
 19 A. Yes.
 20 Q. -- when the vehicle is coming out, but this gives us an
 21 idea of the very limited pathway the car has got.
 22 A. Yes.
 23 Q. So we can see we've got a vehicle parked across part of
 24 the access road, this black vehicle -- yes?
 25 A. Yes.

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1 Q. -- slightly onto the edge of the carriageway, and you
 2 can see the driver's side door onto the carriageway is
 3 open.
 4 A. Yes.
 5 Q. We have a protestor in the middle of the road, opposite
 6 the police car.
 7 A. Yes.
 8 Q. We have you in the middle of the access road. We'll see
 9 in a minute you've got your loudhailer with you still.
 10 A. Yes.
 11 Q. And let's just play this forward, please.
 12 (Video played)
 13 You see the police officer is still trying to move
 14 people out of the way?
 15 A. Yes.
 16 Q. You're moving back into the middle of the road --
 17 A. No.
 18 Q. -- and then you're following the car out to there?
 19 A. Excuse me, can we stop there? Which way round is it?
 20 You really are -- I'm backing away from the vehicle.
 21 Q. Yes. Look how narrow it is for the car.
 22 A. It is. It's very narrow.
 23 Q. Yes, and let's carry on, please.
 24 (Video played)
 25 We see that the car -- stopping there, the car has

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1 had to go out into the other carriageway, hasn't it, to
 2 get itself straightened up?
 3 A. It certainly has, yes. That car had to act differently
 4 because of this scene, yes.
 5 Q. It's right, isn't it, that your actions, along with
 6 others, considering what the car had to navigate round,
 7 was obscuring that driver's view?
 8 A. With the last car you portrayed some image of me
 9 deliberately going round to the driver's view, so I'm
 10 not even doing that. You can see the people in the far
 11 right-hand corner. Them alone being there means that
 12 that car has got no chance of getting a clear view, but
 13 we're talking -- this was already a daily event. The
 14 police officer was not asking for back-up. The police
 15 officer I think dealt with this situation very well.
 16 But it's like you're insinuating we should have no right
 17 to be there whatsoever and it's my case that I do have
 18 a right to be there, in the -- yes.
 19 MS BOLTON: My Lord, you asked about the reference for
 20 Mr Hardy and, apologies, my Lord, I've marked it as
 21 13 July, it should have been 17 July. It's this
 22 incident. So, Mr Curtin, I apologise. It's my mistake,
 23 my Lord. I've put it in the wrong part in my notes.
 24 But for the purpose of this incident, it's in the
 25 transcript at page 130, Day 4, lines 18 and 19.

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1 MR JUSTICE NICKLIN: Right. Show me the incident in the
 2 video where Mr Hardy -- where Mr Curtin is obstructing.
 3 MS BOLTON: So if we can rewind back, please, maybe
 4 30 seconds.
 5 A. He's got a white car, hasn't he?
 6 MS BOLTON: That's Mr Hardy's car, the first one, my Lord,
 7 that we've just been looking at.
 8 (Video played)
 9 Sorry, that's the --
 10 A. It's the previous car, isn't it -- the first car?
 11 MS BOLTON: Apologies, my Lord. That's a yellow vehicle.
 12 It just doesn't -- it looks a bit strange in the video.
 13 Apologies, my Lord. It looked white, coming out of
 14 there.
 15 If we can play on, Mr Hardy's car is the next car,
 16 Mr Curtin.
 17 A. Okay.
 18 (Video played)
 19 Q. If we can play this video until one minute, 52 seconds,
 20 please.
 21 So we can see there Mr Curtin by the side of the
 22 vehicle?
 23 A. Yes.
 24 Q. Okay? We can see again how narrow the access is for the
 25 driver of the white vehicle?

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1 A. Yes, I can't ... I am not --
 2 Q. If we can play --
 3 A. You cannot say that I am obstructing his view there.
 4 Q. Well, let's just see the car come out, Mr Curtin.
 5 A. Yes.
 6 Q. If we can play to two minutes and nine seconds, please.
 7 (Video played)
 8 Stop there, please.
 9 We can see that that vehicle has had to come out
 10 again into the middle of the carriageway.
 11 A. Yes. If you're suggesting that happened because I was
 12 standing next to this car, I think it's a nonsensical
 13 point you're making, if you're saying that I obstructed
 14 that vehicle.
 15 Q. And it's right, isn't it, that when you asked Mr Hardy
 16 about this incident, he explained to you that he
 17 couldn't see with you standing there?
 18 A. I believe that's what -- if that's what his evidence
 19 was.
 20 MR JUSTICE NICKLIN: I've read that at the break. I think
 21 you need to put it in its proper context because I think
 22 Mr Hardy's evidence was -- Mr Hardy then accepted that
 23 it was because there was a large group of people and you
 24 were amongst them.
 25 MS BOLTON: Yes.

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1 MR JUSTICE NICKLIN: Okay. Well, that's quite important in
 2 that question.
 3 MS BOLTON: My Lord, apologies.
 4 It's right, isn't it, Mr Curtin, that Mr Hardy's
 5 evidence was that you, along with others, were the
 6 reason why he couldn't see as he was trying to access
 7 the highway?
 8 A. Yes, and that's kind of obvious because we're there and
 9 we're protesting and we're not --
 10 MR JUSTICE NICKLIN: Right, rewind the footage.
 11 A. We're not transparent.
 12 MR JUSTICE NICKLIN: Rewind the footage to where Mr Curtin
 13 is next to the white vehicle. Right, start from here.
 14 Ms Bolton, you stop the video at the point at which you
 15 want to put to Mr Curtin that he is obstructing
 16 Mr Hardy's view.
 17 (Video played)
 18 MS BOLTON: Stop there, please. Sorry, I think we need to
 19 go back a few seconds. Play forward.
 20 (Video played)
 21 And pause. It's right, isn't it, Mr Curtin, that at
 22 that point, between you, the other protestor in front of
 23 you and the vehicle to the left, Mr Hardy's view is
 24 obscured, isn't it? There's no way he can see through
 25 the gap between the tent and the car? There's no way he

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1 can see that because he's got a group of protestors,
 2 including yourself, at his passenger side window?
 3 A. Yes, it's undoubted -- there's a whole manner -- there's
 4 a woman standing on the car, there's someone holding
 5 a placard. But the question is -- should be towards me,
 6 "You were asked to stop, at which point Mr Curtin ...",
 7 and it's absolute nonsense. I don't -- it's kind of
 8 pathetic to suggest that it's me that's blocking -- his
 9 obstruction there.
 10 Q. Well, you're one of the people, aren't you, Mr Curtin,
 11 obstructing --
 12 MR JUSTICE NICKLIN: I think -- the police officer in front
 13 of his vehicle is likely to be the operative obstruction
 14 there. He's being guided by the police officer out of
 15 the facility. His attention will be on the police
 16 officer because he won't want to run the police officer
 17 down. So this isn't your strongest point and I think
 18 we've done enough for today.
 19 Right. Overnight, Mr Curtin, the same rules apply,
 20 please. Don't discuss your evidence with anybody.
 21 We'll be back -- I think we had better start at
 22 10 o'clock tomorrow.
 23 A. Can I ask a question?
 24 MR JUSTICE NICKLIN: Yes.
 25 A. There's a demonstration tonight at Scotland Yard about

1 some dogs.
 2 MR JUSTICE NICKLIN: Okay.
 3 A. It was kind of suggested to me by -- helpfully by MBR's
 4 solicitors that I need to be careful, once I'm under
 5 this taking oath --
 6 MR JUSTICE NICKLIN: As long as you don't talk to them about
 7 your evidence in this case, you can -- What you're not
 8 allowed to do is to discuss with anybody, "I've been
 9 asked these questions. What do you think I should say
 10 about this?". You're perfectly free to go to
 11 a demonstration. Please don't get arrested. Just
 12 don't -- you can say to them that you're currently
 13 giving evidence in the High Court proceedings --
 14 A. Yes.
 15 MR JUSTICE NICKLIN: -- you can tell people what you think
 16 about the proceedings generally and your role in them.
 17 None of that is of worry. Just don't discuss the
 18 nitty-gritty of your evidence with anybody.
 19 A. Okay.
 20 MR JUSTICE NICKLIN: All right?
 21 A. I understand.
 22 MS BOLTON: I explained to Mr Curtin, my Lord, that we
 23 normally advise -- I'd explained that, but I'd explained
 24 that we normally advise people to try and have lunch
 25 separately, things like that.

1 MR JUSTICE NICKLIN: Yes. The general rule is the safest
 2 course is to protect yourself from any allegation that
 3 you have been discussing the case with people connected
 4 with the case. It's usually a good idea not to be seen
 5 chatting generally with other witnesses in the case, for
 6 example. But the strict rule is you're not allowed to
 7 discuss your evidence whilst you're in the process of
 8 giving your evidence. Apart from that, there are no
 9 restrictions on your daily life; all right?
 10 A. So sometimes I make a livestream when I leave here,
 11 so -- I would like to and then I just say --
 12 MR JUSTICE NICKLIN: You can just say, "I'm giving evidence
 13 and I can't discuss the case and I can't discuss my
 14 evidence and I'm going to carry on giving evidence
 15 tomorrow and the judge has made it clear that I mustn't
 16 discuss my evidence, but I'll be free to discuss once
 17 I've finished giving evidence"; all right?
 18 A. Okay.
 19 MS BOLTON: My Lord, a couple of matters about tomorrow.
 20 First of all, I hope your Lordship is aware but there
 21 are a number of train strikes tomorrow. I know that the
 22 transcriber has asked if she can appear remotely.
 23 MR JUSTICE NICKLIN: I've given permission for that.
 24 MS BOLTON: My Lord, both myself and Ms Pratt are unsure,
 25 because our train operator hasn't finalised their

1 timetable yet, as to what our challenges are tomorrow in
 2 getting in.
 3 MR JUSTICE NICKLIN: Okay. Well, it's not for me to say,
 4 but MBR Acres may find, given both of your important
 5 roles in these proceedings, for them to arrange for
 6 a car to take you in tomorrow.
 7 MS BOLTON: My Lord, I flag for two reasons. I just flag
 8 just in case there's difficulties with the trains and
 9 whether we could start at 10.30 because I suspect there
 10 will be some difficulty with the trains.
 11 MR JUSTICE NICKLIN: All right. How many more incidents
 12 have we got to go through?
 13 MS BOLTON: My Lord, there's a lot of incidents to go to --
 14 MR JUSTICE NICKLIN: Okay.
 15 MS BOLTON: -- but some are very different --
 16 MR JUSTICE NICKLIN: I'm going to make this suggestion,
 17 which is I would leave it to you to pick the best view
 18 of the event that you think demonstrates what you say is
 19 important evidence. I'm not sure that watching the
 20 incident from three different angles has been
 21 particularly helpful today. If you -- one of those
 22 views -- and I leave it up to you to pick what you think
 23 is the best view -- if Mr Curtin says, "I don't think
 24 that's right. I didn't do that. I think it's clear
 25 from another video", then he will say so and we can look

1 at the other videos. But we're going to take a very
 2 long time to go through each incident if we're going to
 3 look at it from three different views.
 4 MS BOLTON: We're not for each incident, my Lord. It's some
 5 videos you've got everything you need on one video,
 6 others, it's different views and it sort of depends on
 7 what the witness accepts as to what's happened on the
 8 highway afterwards. But it's not all a case of watching
 9 three camera angles on each video.
 10 MR JUSTICE NICKLIN: So you might like to take stock because
 11 if you can summarise, for example, to Mr Curtin that you
 12 are going to say that in the incidents that are pleaded
 13 against him -- in the subsequent incidents, that you say
 14 broadly "You have done similar", which is "You have
 15 stood in front of cars, albeit temporarily or
 16 momentarily, you have therefore obstructed their free
 17 passage out of the facility and that you have therefore
 18 obstructed their access to the land and that you have on
 19 occasion stood on the parts of the land which we now
 20 know are claimed by MBR Acres", Mr Curtin may very well
 21 say, "Well, broadly, yes, I accept all of those things",
 22 because ultimately it's going to be for me to decide
 23 whether Mr Curtin has been obstructing vehicles in a way
 24 that would give rise to a civil liability in relation to
 25 that.

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1 And whilst of course I accept -- and I know that you
 2 are doing what you're required to do, which is to put
 3 the case against Mr Curtin so that he has an opportunity
 4 to deal with it, it may be that Mr Curtin will be able
 5 to realise that there's a degree of repetition to these
 6 matters and that his answers aren't going to materially
 7 change incident by incident. But we will see where we
 8 go. We might take stock at lunchtime tomorrow.
 9 MS BOLTON: My Lord, indeed. Some of them are very short
 10 sets of questions for some incidents, but just to
 11 be clear of one of the reasons why they're not.
 12 Obviously there's a number of causes of action pleaded.
 13 What I've done is I've put them into date order and try
 14 to deal with all of the causes of action so we don't
 15 have to go back to the same video.
 16 MR JUSTICE NICKLIN: No, I appreciate that.
 17 MS BOLTON: But it is still -- even on just the videos, even
 18 if we take Mr Curtin to one video, there are a lot of
 19 incidents so I'm afraid it might take a little while.
 20 MR JUSTICE NICKLIN: Okay.
 21 Right. Well, we'll sit at 10.30 tomorrow.
 22 Mr Curtin, have you got a problem with trains
 23 tomorrow or are you --
 24 A. I'll get here.
 25 MR JUSTICE NICKLIN: Okay, thank you.

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1 (4.44 pm)
 2 (The hearing adjourned until
 3 Friday, 12 May 2023 at 10.30 am)

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