



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

Day 16

May 23, 2023

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1 Tuesday, 23 May 2023  
 2 (10.30 am)  
 3 MR JUSTICE NICKLIN: Yes, Mr Curtin.  
 4 MR CURTIN: I'd just like to begin the day by a bit of  
 5 housekeeping really. In the submissions put to you,  
 6 it's always been a mystery to me the selection process  
 7 and I feel like there's a Curtin factor. I feel I'm  
 8 here today and I've been targeted by the company. There  
 9 was presentations put to you, how difficult it has been  
 10 to find the details of other people who perhaps may be,  
 11 should be, perhaps equally deserving. There's a person  
 12 at the back here, Mr Dan Kipley(?). He's one of the  
 13 people that broke into the site. Your Honour referred  
 14 that, I think, I remember -- well, that's a criminal  
 15 action. He would take you up on that and say -- in  
 16 a criminal trial and he still hasn't been charged it.  
 17 He's trying to get charged. He would have the defence  
 18 of honest intent, he believes.  
 19 So he's here today to -- not any great moment.  
 20 I told him that they're presenting the case, like,  
 21 "You're on the run. They can't track you down". He  
 22 went to the police station. His name has appeared in  
 23 newspapers and online media and he's here today, he  
 24 can't stay that long, I don't think, but he's here to  
 25 facilitate the court -- I'm sure we can do a bit of

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1 match-making -- and I just want to present a case that,  
 2 when I told him -- it's like, "You're on the run", he  
 3 was disappointed that Animal Rebellion have been so hard  
 4 to track down because they're publicly open and  
 5 accountable.  
 6 MR JUSTICE NICKLIN: All right. Thank you.  
 7 I just want to go back to the topic of public  
 8 nuisance.  
 9 MS BOLTON: My Lord, I was going to take the court back to  
 10 that myself, but may I just ask, on the basis of what  
 11 Mr Curtin has just said, because obviously we need the  
 12 court's permission, do we have permission, my Lord, to  
 13 serve this gentleman whilst he's in court?  
 14 MR JUSTICE NICKLIN: No. You can make arrangements with him  
 15 and he doesn't seem to me to be -- he's obviously  
 16 willing to talk to your solicitors and you can arrange  
 17 to take him outside. I'm not having that sort of  
 18 theatrics in the courtroom when I'm busy doing other  
 19 things.  
 20 MS BOLTON: I only ask, my Lord, because what is always  
 21 presented as simple isn't always that simple, but I hear  
 22 the court.  
 23 Closing submissions by MS BOLTON (continued)  
 24 MR JUSTICE NICKLIN: Right. I've looked at public nuisance  
 25 and the Clerk & Lindsell's paragraph relevant to it has

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1 been replaced because -- it's paragraph 19-03. It's now  
 2 in the supplement. It's been replaced because it now  
 3 takes -- the criminal offence of public nuisance has  
 4 been abolished by the Police, Crime, Sentencing and  
 5 Courts Act, so it notes that and says the tort still  
 6 exists. Then it relies upon several authorities, one of  
 7 which includes Rimmington that I referred to yesterday.  
 8 Rimmington seems to be the leading authority which tells  
 9 you what "public nuisance" is and it also quotes from  
 10 Attorney General v PYA Quarries, where  
 11 Lord Justice Romer and Lord Justice Denning defined  
 12 "public nuisance". Lord Justice Denning said:  
 13 "Public nuisance is a nuisance which is so  
 14 widespread in its range or so indiscriminate in its  
 15 effect that it would not be reasonable to expect one  
 16 person to take proceedings on his own responsibility and  
 17 put a stop to it, but it should be taken on the  
 18 responsibility of the community at large [as read]."  
 19 Then I quoted yesterday what Lord Rodger said at  
 20 paragraph 44 about that similar point, which is:  
 21 "Later I tend to elide the difference between common  
 22 and public nuisances, but throughout it has remained an  
 23 essential characteristic of public nuisance that it  
 24 affects community and members of the public as a whole  
 25 rather than merely individuals [as read]."

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1 So that's what -- at the moment what I -- I regard  
 2 that and I propose to take that as the definition of  
 3 "public nuisance".  
 4 MS BOLTON: My Lord, that is the definition of "public  
 5 nuisance" but it's also the case that, in the case of  
 6 obstruction of the highway, it is well recognised that,  
 7 where it affects a particular class of highways users,  
 8 they can bring a claim. It doesn't always have to be on  
 9 behalf of the community at large. That's fairly well  
 10 established.  
 11 My Lord, the point I wanted to make about the public  
 12 nuisance point, though, is to just give your Lordship  
 13 the references in each one of the incidents where the  
 14 carriageway and the public at large are affected because  
 15 it's eight of those incidents where that happens. So it  
 16 is a significant number of them where, in any event,  
 17 that would be the case. But there is a difference in  
 18 that generally public nuisance cannot be brought by  
 19 a claimant such as MBR and the second claimant class,  
 20 but obstruction of the highways is one of the areas  
 21 where it can be where you've suffered particular damage.  
 22 So that's the difference.  
 23 If I can just refer your Lordship to the --  
 24 MR JUSTICE NICKLIN: That analysis doesn't seem to be -- the  
 25 correct analysis, it seems to me, is the tort is public

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1 nuisance. Nobody can bring a private law claim for  
 2 obstruction of the highway. It's not a tort, it's  
 3 a crime. If you want to bring a claim in relation to  
 4 what you claim is a public nuisance caused by  
 5 obstruction of the highway, then it remains public  
 6 nuisance. It is not -- obstruction of the highway is  
 7 the type of public nuisance.  
 8 MS BOLTON: My Lord, yes, I don't dispute that at all. The  
 9 difference is who can bring it. So usually most public  
 10 nuisance cases, a claimant such as MBR wouldn't be able  
 11 to bring a claim at all, but they can for obstruction of  
 12 the highway if they've suffered particular damage.  
 13 MR JUSTICE NICKLIN: Well, I think -- I don't disagree with  
 14 that, but I think the proper way to characterise that is  
 15 that they, like every other claimant for public  
 16 nuisance, must show that they've suffered particular  
 17 damage.  
 18 MS BOLTON: My Lord, yes --  
 19 MR JUSTICE NICKLIN: They're not in a special category that  
 20 it's obstruction of the highway. The question is: have  
 21 you been affected and therefore suffered particular  
 22 damage as a result of a public nuisance?  
 23 MS BOLTON: Yes.  
 24 MR JUSTICE NICKLIN: That's the question.  
 25 MS BOLTON: My Lord, just to recap on the incidents pleaded,

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1 the first 13 July incident is video 18, which  
 2 demonstrates an impact on the public at large on the  
 3 carriageway.  
 4 MR CURTIN: What date? Sorry.  
 5 MS BOLTON: It's the first 13 July incident, pleaded at  
 6 paragraph 173.1.  
 7 The second incident is paragraph 173.2, again  
 8 13 July. That's video 22 and the particular impact on  
 9 the public is at three minutes and 30 seconds onwards.  
 10 The third incident is 17 July 2021 at  
 11 paragraph 173.3 of the particulars of claim, and that's  
 12 video 828 that shows the impact on the public.  
 13 The next one is 12 August 2021 and, again, that's  
 14 video -- I'm just checking which one of the videos it  
 15 is, my Lord. It's 174 and 200.  
 16 Then 8 September 2021, that's the entirety of the  
 17 incident video, 257, 255. That's where a truck driver  
 18 is being stopped on the highway, on the actual  
 19 carriageway. 8 September 2021 is video 724 at one  
 20 minute and 56 seconds.  
 21 13 September 2021 is video 289 at three minutes and  
 22 25 seconds. 13 September 2021 is video 300 at one  
 23 minute 45 seconds.  
 24 26 April 2022, which is the incident which we are  
 25 not looking at in detail but we say that that is

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1 a carriageway obstruction incident, and 11 July 2022.  
 2 So there's eight incidents which involve --  
 3 MR CURTIN: What's the allegation there? Sorry, 11 July.  
 4 MR JUSTICE NICKLIN: You're saying Mr Curtin is responsible  
 5 for all of those?  
 6 MS BOLTON: Mr Curtin is materially responsible in each one  
 7 of those and indeed on a number of them is the person in  
 8 the carriageway causing the obstruction, yes.  
 9 My Lord, so --  
 10 MR JUSTICE NICKLIN: Just so we're clear on the legal  
 11 framework, it seems to me the question is one of fact  
 12 and degree as to whether or not the particular  
 13 obstruction has caused a public nuisance.  
 14 MS BOLTON: Yes.  
 15 MR JUSTICE NICKLIN: Right. Good.  
 16 MS BOLTON: My Lord, dealing with the next part of the  
 17 closing, harassment, the claimants allege at  
 18 paragraph 184 of the particulars of claim, pages 37  
 19 to 38 of D11's bundle, that Mr Curtin is liable for the  
 20 tort of harassment. That claim is parasitic on the  
 21 other causes of action in that the acts relied upon and  
 22 alleged to be the commission of the other pleaded torts  
 23 constitute the course of conduct required for a claim in  
 24 harassment. Further, the claimants rely on two  
 25 stand-alone incidents of harassment against Mr Curtin,

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1 pleaded at paragraphs 184.1 and 184.2 of the particulars  
 2 of claim. A third stand-alone claim is also pleaded at  
 3 paragraph 184.3, but this is in fact the same alleged  
 4 trespass by use of drones pleaded at paragraph 170.10 of  
 5 the particulars of claim.  
 6 It is well established that the staff of the first  
 7 claimant and members of the second claimant class have  
 8 endured the shouting of abuse and name-calling for  
 9 almost 22 months. That abuse includes the shouting of  
 10 phrases such as "Puppy killer", "Scum" and "Shit  
 11 shoveler". However, it is important to remember that  
 12 the claimants do not complain about the verbal abuse and  
 13 name-calling engaged in by Mr Curtin *per se* and do not  
 14 allege that the same is the course of conduct that  
 15 amounts to harassment. Rather, abuse and name-calling  
 16 are relied upon as aggravating features of the other  
 17 torts that are relied upon to establish the required  
 18 course of conduct for a claim in harassment.  
 19 Legal principles: statutory regime.  
 20 The claimants rely on section 1, 1(1A), 3 and 3(A)  
 21 of the Protection from Harassment Act 1997. Where an  
 22 individual is bringing the claim, that person has  
 23 a cause of action under section 1(1) of the Act where he  
 24 or she is a victim of a course of conduct pursued by  
 25 another person that amounts to harassment and which the

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1 other person knows or ought to know amounts to  
2 harassment. A course of conduct in relation to  
3 section 1(1) is conduct on at least two occasions in  
4 relation to the persons pursuant to section 7(3)(a) of  
5 the act.

6 In the case of a company, a cause of action may  
7 exist under section 1(1A). In particular section 1(1A)  
8 provides that a person must not pursue a course of  
9 conduct which involves the harassment of two or more  
10 persons which he knows or ought to know involves  
11 harassment of those persons and by which he intends to  
12 persuade any person, which does not necessarily have to  
13 be the same person experiencing the course of conduct,  
14 (i) not to do something that he is entitled or required  
15 to do or (ii) to do something that he is not under any  
16 obligation to do. A course of conduct in relation to  
17 section 1(1A) is conduct on at least one occasion in  
18 relation to each of those persons pursuant to  
19 section 7(3)(b).

20 An actual or apprehended breach of section 1(1) may  
21 be the subject of a claim in civil proceedings as per  
22 section 3(1). In the case of an actual or apprehended  
23 breach of section 1(1A), an application may be made to  
24 the High Court for an injunction restraining the alleged  
25 harassment.

1 Accordingly, under section 1(A1) and section 3A the  
2 first and third claimants can seek relief against  
3 a defendant who pursues, or if it is apprehended that  
4 they will pursue, a course of conduct which the  
5 defendant knows or ought to know involves harassment of  
6 two or more individuals, such as their staff, service  
7 providers and contractors, with the intention of  
8 persuading those persons or the first and third  
9 claimants themselves not to do something which — if  
10 they are entitled to do or to do something which they  
11 are not under an obligation to do.

12 Referencing to harassing a person includes alarming  
13 the person or causing the person distress; section 7(2),  
14 Protection from Harassment Act.

15 Finally, sections 1(1) and 1(1A) are disapplied  
16 where the defendant can show that in the particular  
17 circumstances the pursuit of their course of conduct was  
18 reasonable.

19 Legal principles: common law.

20 In *Majorowski v Guy's and St Thomas' NHS Trust*  
21 [2006] UKHL 34; [2007] 1 AC 224, it is said that  
22 harassment is conduct that crosses the boundary between  
23 the regrettable to the unacceptable and that the conduct  
24 must be oppressive and unacceptable.

25 In *Dowson v Chief Constable of Northumbria Police*

1 [2010] EWHC 2612 (QB), Mr Justice Simon set out at  
2 paragraph 142 six elements which must be established  
3 before liability for harassment can be found.

4 There must be conduct which occurs on at least two  
5 occasions — sorry — one, there must be conduct which  
6 occurs on at least two occasions; two, which is targeted  
7 at the claimant, although the Court of Appeal has since  
8 held that conduct merely needs to have been targeted at  
9 an individual; three, which is calculated in an  
10 objective sense to cause alarm or stress; four, which is  
11 objectively judged to be oppressive and unacceptable;  
12 five, what is oppressive and unacceptable may depend on  
13 the social or working context in which the conduct  
14 occurs; and six, a line is to be drawn between conduct  
15 which is unattractive and unreasonable and conduct which  
16 has been described in various ways as torment of the  
17 victim of an order that would sustain criminal  
18 liability.

19 Parasitic harassment claims.

20 Course of conduct.

21 Put simply, the claimants rely upon the alleged  
22 incidents of trespass, interference with the first  
23 claimant's common law right to access the highway and  
24 obstruction of the highway as the course of conduct  
25 required for a claim in harassment as well as the two

1 stand-alone incidents. It is submitted that the same is  
2 sufficient for the purposes of section 1(1) and/or  
3 section 1(1A).

4 Alarm and distress.

5 Each employee describes in their witness statement  
6 feelings of distress, anxiety, intimidation, stress,  
7 fear and terror or combinations and variations thereof,  
8 experienced during and as a result of the incidents  
9 alleged against Mr Curtin. It is not possible to repeat  
10 that evidence in full here and the court and Mr Curtin  
11 are respectfully referred to the witness statements in  
12 this regard.

13 MR JUSTICE NICKLIN: Can I just ask about — I just want to  
14 understand this nature of a parasitic claim for  
15 harassment. The incidents relied upon as the course of  
16 conduct are trespass, obstruction of the entry to the  
17 highway and obstruction of the highway. Those are the  
18 elements of the course of conduct.

19 MS BOLTON: Those incidents relied upon under those causes  
20 of action, yes.

21 MR JUSTICE NICKLIN: I can see circumstances in which  
22 repeated acts of trespass, if, for example, they were  
23 carried out as part of a campaign of stalking, might  
24 amount to harassment, but whether it does or not has got  
25 little to do with whether it's trespass. If I'm

1 stalking somebody, the acts of stalking I do may take  
 2 place on public land, private land, a combination of the  
 3 two. Equally, obstructing a highway ... I can just  
 4 about see that if I am a person who somebody takes  
 5 against and decides that, wherever I go, they're going  
 6 to follow me, obstruct my car, prevent me leaving my  
 7 driveway, all of those could be harassing acts, but the  
 8 fact that they're independent torts doesn't really add  
 9 anything to the harassment.  
 10 MS BOLTON: No, my Lord, we're not suggesting it does;  
 11 simply that the harassment arises out of those causes of  
 12 action and those incidents because of the repetitive and  
 13 targeted nature. That's all we're saying. We're not  
 14 elevating it in any way to any greater weight as  
 15 a result of it. That's not our case.  
 16 MR JUSTICE NICKLIN: Right. Okay. And then what's shouted  
 17 at them isn't alleged to be harassment?  
 18 MS BOLTON: What is alleged to be harassment is the course  
 19 of conduct of stopping, surrounding and directly  
 20 targeting with the loudhailer but not the particular  
 21 words. We heard a lot about particular words. That's  
 22 not our complaint. It's the angry surrounding and  
 23 stopping that is at issue here and the repeated nature  
 24 of it and the way it is targeted at a group of people  
 25 for a particular purpose.

1 MR JUSTICE NICKLIN: If you were to succeed with your claims  
 2 in trespass, interference with the right of access and  
 3 obstruction of the highway, what more does a harassment  
 4 claim give you?  
 5 MS BOLTON: In respect of this particular order that we're  
 6 seeking, it would be to do with the filming of the staff  
 7 and their cars as they're coming and going, so it's to  
 8 try and prevent them being the target. It doesn't add  
 9 anything else and there is nothing else that we're  
 10 seeking in the injunction that requires proof of  
 11 harassment. It's a fairly -- you'll see that -- you  
 12 know, we accept we don't have -- there are certain  
 13 individuals where we have greater evidence of harassment  
 14 away from the site that have now settled this claim, but  
 15 in respect of Mr Curtin there's none of those  
 16 requirements. It is only that.  
 17 MR CURTIN: My Lord, is there recognition -- I'm just  
 18 inviting -- is there recognition in my case, at least,  
 19 that there has been no case proved against me that I've  
 20 used offensive language, that I've targeted people, the  
 21 way I've cross-examined the witnesses as "Puppy killer"  
 22 and I've explained that. The witnesses describe their  
 23 main harassment is -- well, they said, "It's horrible to  
 24 be called these things, it's horrible to be called these  
 25 names". But in my case, this is not even -- this has

1 disappeared from the evidence because it's all about the  
 2 obstruction now. I'm just wondering, in the case of --  
 3 are they dropping any case they originally had that  
 4 Mr Curtin's conduct in itself was causing harassment and  
 5 especially the shouting of names? That was put against  
 6 me.  
 7 MS BOLTON: Mr Curtin's conduct, as I've already said in the  
 8 submission, is an aggravating factor, so the shouting of  
 9 words is an aggravating factor, but the course of  
 10 conduct is the targeting and stopping of the staff and  
 11 shouting through loudhailers and surrounding them. The  
 12 actual words used are simply just aggravating factors.  
 13 We're not suggesting that they themselves are the course  
 14 of conduct.  
 15 MR JUSTICE NICKLIN: There's potentially a causation problem  
 16 there because, if the evidence is that what has actually  
 17 caused distress and alarm to the individual employees is  
 18 the shouting at them day after day, but that's not the  
 19 harassment that's relied upon, then the actual  
 20 obstruction hasn't actually caused any distress, alarm,  
 21 whatever.  
 22 MS BOLTON: The shouting at them is, my Lord. What I'm  
 23 saying is the actual words -- there was a lot of time  
 24 taken up on "Puppy killer", but we're not suggesting  
 25 harassment is caused by calling the staff "Puppy

1 killer". It's the conduct and the targeting and  
 2 shouting through the loudhailer which, as one of the  
 3 employees said -- well, several of the employees  
 4 indicated that standing back shouting something isn't  
 5 a problem, but being surrounded, having somebody angrily  
 6 shouting at them, stopping their car, with  
 7 a loudhailer -- and I think one of them said as a lone  
 8 woman in a car -- yes, that's harassment to them and  
 9 that's the target that we say is harassment.  
 10 MR JUSTICE NICKLIN: Let's just look at that because if it's  
 11 targeted shouting, irrespective of content of the  
 12 message, so it's the fact that they are subject to  
 13 people shouting at them -- I mean, I've referred to this  
 14 before in the interim injunction application,  
 15 harassment -- there is no doubt and there can be no  
 16 challenge to the proposition that the shouting is part  
 17 of the protest --  
 18 MS BOLTON: Yes.  
 19 MR JUSTICE NICKLIN: -- therefore the shouting is an  
 20 Article 10 protected right.  
 21 MS BOLTON: Yes.  
 22 MR JUSTICE NICKLIN: The engagement with harassment is  
 23 therefore a very difficult one because it would be -- it  
 24 is recognised to be a serious interference with freedom  
 25 of expression if those wishing to express their own

1 views could be silenced or threatened with claims for  
2 harassment based upon the subjective claims by  
3 individuals that they feel harassed, offended, insulted,  
4 whatever it is.

5 MS BOLTON: Yes, but it's targeted in the sense of --- it's  
6 been some of the employees' evidence that, if somebody  
7 shouted --- and it's no part of our order, asking for  
8 these words not to be shouted at anybody. What is  
9 harassment, though, we say, is picking up a loudhailer,  
10 shouting aggressively, whatever that is, whether that's  
11 "Puppy killer", "Shit shoveler", "Leave your job", and  
12 stopping and surrounding them. It's the same as taking  
13 the loudhailer and following somebody around, shouting.  
14 It's that same targeted nature that's the issue here  
15 rather than the words used.

16 Yes, the words are all part of what is designed to  
17 convince the staff to leave, but it's the conduct. If  
18 Mr Curtin has stood shouting, "When are you going to  
19 leave your job?", from the other side of the road, we  
20 would be in difficulty to allege that's harassment ---

21 MR JUSTICE NICKLIN: Right.

22 MS BOLTON: --- but when he surrounds a car and shouts it,  
23 that's the issue and that's why we're not targeting in  
24 the order the words used. We're not here to try and say  
25 that Mr Curtin shouldn't be allowed to say these things.

1 It's where and how he's conducting himself when he's  
2 saying these things.

3 MR JUSTICE NICKLIN: Right. Okay.

4 MS BOLTON: Further, each employee describes in their  
5 witness statement feelings of distress, anxiety,  
6 intimidation, stress, fear and terror or combinations  
7 and variations thereof, experienced during and as  
8 a result of the protests more generally. It is not  
9 possible to repeat that evidence in full here, but one  
10 particular example is Mr Manning describing that he  
11 often has to pull over when travelling home from work  
12 and take 20 minutes to be by himself and deal with the  
13 stress of the protests; second witness statement of  
14 Mr Manning, paragraph 104.

15 During cross-examination, Mr Curtin often did not  
16 explore with the witnesses the exact effect that his  
17 actions had in contribution to their alarm and distress.  
18 Examples of when that question was explored included,  
19 one, Employee V was asked, when discussing paragraphs 33  
20 and 34 of his witness statement which relate to an  
21 incident on 8 September 2021 at 4 o'clock, whether he  
22 was intimidated and scared by Mr Curtin on that date and  
23 during that demonstration, with Employee V's witness  
24 statement having used those words to describe the  
25 feelings caused by reason of protestors standing close

1 to his car. Employee V replied:  
2 "I can only answer that in one way. I know you were  
3 there and I am worried when you're there what  
4 instructions you could be giving to other members of the  
5 protest."

6 Transcript Day 8, page 100, lines 12 to 15.

7 Two, Employee B, when being questioned in relation  
8 to the incident on 13 September 2021, as captured in  
9 video 294, in which incident Mr Curtin was shouting at  
10 Employee B with a loudhailer, said:

11 "I feel for any lone woman in a vehicle, having men  
12 aggressively shout through their window with  
13 a megaphone, might be made to feel vulnerable."

14 Further, it is submitted that the evidence of the  
15 employees obtained under cross-examination showed that  
16 the obstruction of cars generally cause alarm and  
17 distress to the first claimant's staff and members of  
18 the second claimant class. Examples of that evidence  
19 given by the employees include:

20 "One, Mr Hardy described the experience of entering  
21 and exiting the Wyton site prior to the injunction as  
22 terrifying; paragraph 6 of Mr Hardy's witness statement.  
23 When pressed in cross-examination, Mr Hardy maintained  
24 this position and also expanded upon the reasons why he  
25 was concerned for his safety and which led to his

1 terror:  
2 "There was incidences where staff cars had been hit,  
3 windows had been hit, doors had been pulled, so,  
4 therefore, our safety was a concern to us."

5 Transcript Day 4, page 100, line 4, to page 101,  
6 line 14.

7 MR JUSTICE NICKLIN: It is important in looking at this  
8 evidence because Mr Curtin is only answerable for the  
9 acts of alleged harassment against him.

10 MS BOLTON: Yes.

11 MR JUSTICE NICKLIN: He is not answerable for what other  
12 people do or other threats other people may have  
13 presented to the employees.

14 MS BOLTON: Indeed, my Lord, but what Mr Curtin was  
15 exploring with Mr Hardy there was why surrounding of the  
16 cars and shouting at him would make him scared, and that  
17 was his answer. And then it's relevant also to the  
18 incidents where he identifies Mr Curtin because he's  
19 explaining why it has that impact.

20 MR JUSTICE NICKLIN: But the test ultimately is an objective  
21 one for harassment.

22 MS BOLTON: Yes, indeed.

23 Mr Hardy described the terror in the back of his  
24 mind in relation to the obstruction that occurred on  
25 12 August 2021, in which incident Mr Curtin was

1 involved; transcript Day 4, page 138, line 25.  
 2 Three, the Production Manager, when asked by  
 3 Mr Curtin if it was frustrating to have to slow down her  
 4 vehicle because of protestors, replied:  
 5 "It is frustrating, yes, which — but it could be  
 6 acceptable just to have to slow down. But when you have  
 7 people standing all around your vehicle, in front of  
 8 your vehicle, putting placards on the windscreen and at  
 9 the sides of your vehicle, that is not acceptable."  
 10 Transcript Day 5, page 23, lines 8 to 12.  
 11 Four, Employee AF, when answering questions relating  
 12 to an incident in which it is not alleged Mr Curtin is  
 13 involved, expressed that she was scared and went on to  
 14 say:  
 15 "If [the protestors] were calm and peaceful and  
 16 not shouting abuse, I probably would not have been  
 17 scared ... but the fact is they came towards my car and  
 18 were shouting abuse at me whilst I was waiting to turn  
 19 into the site."  
 20 I think that should have said but the fact was —  
 21 no, apparently the quote is correct. Apologies,  
 22 my Lord. Transcript Day 5, page 80, lines 20 to 25.  
 23 Employee AF also stated:  
 24 "If there is just one person far enough away from  
 25 the gate just holding a banner, that would not distress

21

1 me. If there were multiple people standing away from  
 2 the gate, not blocking my path, holding a banner, that  
 3 would not distress me. People standing in the road,  
 4 blocking my path, shouting abuse at me, that is what  
 5 distresses me."  
 6 Transcript Day 5, page 95, lines 15 to 20.  
 7 Six, Employee V, when asked by Mr Curtin if he found  
 8 slow-walking in the carriageway frightening, replied —  
 9 my Lord, that was in response to an incident involving  
 10 Mr Curtin:  
 11 "Yes, because when they're around the car, they're  
 12 knocking on the windows and doors, you have no idea how  
 13 frightening that is, especially when some of them are so  
 14 angry and some of the death threats that have been put  
 15 on the internet, what they're going to do to the staff,  
 16 it does get very worrying when the car is surrounded.  
 17 There's a lot of angry people out there."  
 18 Employee V also confirmed that when his car has been  
 19 surrounded, he has experienced knocking on the door, the  
 20 bending of wing mirrors and protestors trying to open  
 21 the car doors; transcript Day 8, page 75, line 13, to  
 22 page 76, line 4.  
 23 Indeed the harassment inflicted upon the staff of  
 24 the first claimant, one, was a factor that caused  
 25 Employee J to leave the employment of the first

22

1 claimant; Employee J's paragraphs 152 to 160, pages 777  
 2 to 778 in D11's bundle. Employee J described that she  
 3 made the decision to resign "partially as a direct  
 4 result of the protests and partially as a result of the  
 5 indirect impact of the protests", paragraph 153, and  
 6 that "the protestors continuously surrounding my car and  
 7 shouting abuse and the worries that that brought stayed  
 8 with me outside of work"; paragraph 154.  
 9 Two, has directly contributed to at least four staff  
 10 resignations at the Wyton site — paragraphs 6 and 7 of  
 11 Pressick 22 — and also contributed to Employee P's  
 12 diagnosis of depression, which has caused him to be  
 13 signed off from work, Pressick 22, paragraph 15.  
 14 It is submitted that those resignations and  
 15 Employee P's diagnosis further evidence the alarm and  
 16 distress caused to the staff of the first claimant and  
 17 members of the second claimant class.  
 18 Finally, each of the claimants' employee witnesses  
 19 described the persistent and daily nature of the conduct  
 20 complained of as harassment both in their witness  
 21 statements and in cross-examination. The court has  
 22 heard descriptions of how employees feel ground and worn  
 23 down by the daily occurrence of the same; for example,  
 24 Employee A, Day 9, page 29, lines 10 to 13, and  
 25 Employee J, Day 5, page 168, lines 12 to 19. Indeed,

23

1 even Mr Curtin appreciates the daily and persistent  
 2 nature of the conduct, having made much of the same in  
 3 his own evidence, and indeed describing with pride the  
 4 non-stop energy at the gates — Day 10, page 2,  
 5 line 24 — and when cross-examining the claimants'  
 6 witnesses; see in particular the cross-examination of  
 7 Employee H.  
 8 Persuasion of the employees to leave their  
 9 employment.  
 10 Mr Curtin gave inconsistent answers in  
 11 cross-examination when asked whether his actions were  
 12 intended to persuade the staff of the first claimant to  
 13 leave their employment. Mr Curtin's answers range ready  
 14 from, one, denial, see transcript Day 11, page 114,  
 15 lines 2 to 6; two, stating that he is allowed to  
 16 persuade, Day 11, page 125, lines 7 to 9; and three,  
 17 stating:  
 18 "I kind of do want to persuade workers to leave,  
 19 yes. Persuade if I can through information, through  
 20 education. It's not a good place to work."  
 21 Day 12, page 62, lines 2 to 3.  
 22 It is submitted that the reference to education and  
 23 information should be treated with caution, given that  
 24 this statement occurs in the context of  
 25 cross-examination in relation to what the claimants

24

1 submit is an especially egregious incident of harassment  
 2 involving Employee V, which is referred to in a moment.  
 3 In the face of such inconsistencies, it is submitted  
 4 that any denial by Mr Curtin of an intention to persuade  
 5 the staff of the first claimant should be treated with  
 6 extreme caution and given little weight.  
 7 The claimants further submit that the surrounding  
 8 circumstances and other statements of Mr Curtin lend  
 9 weight to his intending to persuade the staff of the  
 10 first claimant to leave their employment. In  
 11 particular, Mr Curtin has protested under the message of  
 12 "Shut down MBR" for over 22 months now and confirmed in  
 13 his opening submissions that, "I do want MBR Acres to  
 14 shut down. It will be one of the happiest days of my  
 15 life when it happens", Day 10, page 4, lines 20 to 22,  
 16 although it is accepted that he then goes on to say that  
 17 a tactic he has not employed to achieve that aim is the  
 18 targeting of workers, which the claimants do not accept  
 19 in this case.  
 20 Two, one of the clearest examples of Mr Curtin  
 21 showing his intention to persuade staff to leave their  
 22 employment can be found in video 24, which captures the  
 23 events of 13 July 2021. Mr Curtin can be heard shouting  
 24 statements such as, "When are you going to leave here?",  
 25 "Everyone who works here apart from your manager will

25

1 leave. You don't want this dead end job" and "Leave  
 2 this hell—hole". Those statements are shouted through  
 3 a loudhailer and towards the windows of cars driven by  
 4 the first claimant's staff as they are held up on the  
 5 access road when trying to leave the Wyton site, in this  
 6 case it being Mr Hardy who is the recipient of this  
 7 treatment. It is submitted that the only sensible  
 8 interpretation of interactions such as these is that  
 9 Mr Curtin is seeking to persuade the staff of the first  
 10 claimant to leave their employment.  
 11 Therefore, it is submitted that Mr Curtin's actions  
 12 are intended to persuade the staff of the first claimant  
 13 to leave their employment or, at the very least,  
 14 persuade the staff of the first claimant and the first  
 15 claimant itself not to carry out the lawful and licensed  
 16 breeding activities at the Wyton site.  
 17 Two additional incidents.  
 18 Two additional incidents are pleaded in support of  
 19 the harassment claim, both of which relate to  
 20 Mr Curtin's positioning of CCTV cameras that recorded  
 21 and monitored the gate area of the Wyton site with both  
 22 cameras having now been removed. The evidence relating  
 23 to these incidents can be found in video 183, in  
 24 relation to the 10 April 2022 incident, pleaded at  
 25 paragraph 184.1 of the particulars of claim, and in

26

1 video 192 in relation to the 7 May 2022 incident,  
 2 pleaded at paragraph 184.2 of the particulars of claim.  
 3 Both videos were exhibited to Pressick 20 and served on  
 4 Mr Curtin.  
 5 As to the incident on 10 April 2022, during the  
 6 course of cross-examination Mr Curtin, one, accepted  
 7 that it was him placing and positioning the camera on  
 8 the pole, transcript Day 12, page 124, lines 10 to 15;  
 9 two, accepted that the camera was directed at the gate  
 10 to the Wyton site, Day 12, page 124, lines 22 to 24;  
 11 three, explained that anyone with the password could log  
 12 into the camera feed and watch the footage being  
 13 captured from anywhere in the world, Day 12, page 125,  
 14 lines 8 to 18, although he then later suggests that this  
 15 might in fact be a second and different camera, Day 12,  
 16 page 129, line 21 to page 130, line 2; accepted that the  
 17 camera could help have a paranoic effect on the workers  
 18 and that the camera was there to film the scene, which  
 19 included vans coming out.  
 20 As to the incident on 7 May 2022, during the course  
 21 of the cross-examination, Mr Curtin, one, accepted that  
 22 it was him who was positioning the camera on the  
 23 water tank, Day 12, page 130, line 22, to page 131,  
 24 line 1; two, explained that it was his intention to  
 25 position the camera to capture activity at the gate,

27

1 especially entry and exit of animal transport vans and  
 2 workers, as it had been noted that animal transport vans  
 3 had been entering the Wyton site at night, Day 12,  
 4 page 131, line 8, to page 133, line 7.  
 5 No employee witnesses gave evidence in relation to  
 6 these specific cameras. However, almost every witness  
 7 gave evidence as to the intimidation and fear that they  
 8 have more generally of being captured in video footage.  
 9 For example, one, Mr Markou explains that it was  
 10 invasive and caused him distress when his image was  
 11 captured, albeit whilst wearing his concealing items of  
 12 clothing and accessories, and uploaded to social  
 13 media — sorry, the image was uploaded to social media.  
 14 Mr Markou was especially concerned that the images could  
 15 be used to identify him and cause him to be targeted by  
 16 protestors; Mr Markou's statement, paragraph 13.  
 17 Two, Ms Read described that she was anxious to  
 18 disguise her identity as she did not want her face  
 19 posted on social media, which was a concern because of  
 20 protestors filming or photographing staff as they  
 21 entered and exited the Wyton site; second witness  
 22 statement of Jane Read, paragraph 26.  
 23 And three, employee A explained that the  
 24 intimidation and their feeling of being personally  
 25 targeted was in part heightened by the protestors

28



1 filming them; employee A, paragraph 18.  
 2 Non—pleaded incidents.  
 3 Three incidents were explored during the course of  
 4 the cross—examination of both the claimants' witnesses  
 5 and Mr Curtin. Those were, one, 7 September 2021,  
 6 covered in the second witness statement of Mr Manning,  
 7 paragraph 98; two, 8 July 2022, covered in Employee V's  
 8 witness statement at paragraphs 58 to 66; and, three,  
 9 19 August 2022, covered in the second witness statement  
 10 of Mr Manning, paragraph 37.  
 11 It is regrettable that the details of these  
 12 incidents were not fully known until draft witness  
 13 statements were received. However, whilst no claim is  
 14 brought in relation to these incidents, it is submitted  
 15 that they are important incidents that should inform the  
 16 court's view of the strength of the pleaded harassment  
 17 claim against Mr Curtin and the likelihood of further  
 18 acts of harassment occurring. That submission is made  
 19 especially in relation to the incident relating to  
 20 Employee V.  
 21 It is submitted that the incident involving  
 22 Employee V is an especially egregious incident of  
 23 harassment in all the circumstances. Video 175, which  
 24 is a Facebook livestream video captured by Mr Curtin,  
 25 shows Mr Curtin following Employee V and a member of the

1 first claimant's security staff for a period of around  
 2 20 minutes and in close proximity, including into  
 3 confined spaces, and repeatedly heckling and abusing  
 4 those persons. In video 175, the security guard can be  
 5 heard asking Mr Curtin not to get so close to him and  
 6 not to touch him.  
 7 Mr Curtin is recording the video throughout on his  
 8 mobile phone from his proximate position to Employee V  
 9 and the security guard. Employee V, accompanied by the  
 10 security guard, is simply attempting to fix the  
 11 perimeter fence of the Wyton site and has unfortunately  
 12 needed to work on the outside of the Wyton site to do  
 13 so.  
 14 Employee V, when cross—examined on this incident,  
 15 see Day 8, page 100, line 21, to page 125, line 14,  
 16 re—emphasised on several occasions that throughout the  
 17 incident he found Mr Curtin intimidating, that he felt  
 18 threatened and uncomfortable and unsecure and "it was  
 19 time to leave" and that he was concerned that Mr Curtin  
 20 was becoming agitated. Employee V has also described in  
 21 his witness statement the effect that the incident has  
 22 had on his mental health, which was again emphasised in  
 23 cross—examination, and also that he now refuses to  
 24 undertake work on the outside of the perimeter fence as  
 25 a result of this incident.

1 When making his opening submissions which he later  
 2 confirmed on oath, Mr Curtin described his actions on  
 3 8 July 2022 as "journalistic". He explained:  
 4 "What I was hoping to achieve — what I set out to  
 5 do every day I'm there is just to tell the world, tell  
 6 people what — be a journalist really — a biased one,  
 7 but a journalist who described ..."  
 8 Transcript Day 10, page 38, line 12, to page 39,  
 9 line 5.  
 10 In cross—examination, see Day 12, page 43, line 18  
 11 to page 69, line 3, Mr Curtin would not accept that  
 12 there was anything at all inappropriate in his actions.  
 13 It is submitted that the refusal to make any concession  
 14 of that nature, even in the face of the evidence shown  
 15 on video 175 and that given by Employee V, is alarming  
 16 in itself and suggests that it is likely and reasonable  
 17 for the claimants to apprehend that such incidents will  
 18 re—occur in the future unless restrained by way of an  
 19 injunction.  
 20 Further, Mr Curtin's propensity to commit such  
 21 actions is clearly evidenced by the incident involving  
 22 Mr Manning on 19 August 2022. In particular, Mr Manning  
 23 complains that Mr Curtin was very close to him and in  
 24 his personal space whilst he was erecting the  
 25 noticeboard and also that Mr Curtin was filming the

1 same, video 950. That re—occurrence of the same  
 2 behaviour by Mr Curtin again tends to suggest that he  
 3 will continue to commit such acts of harassment unless  
 4 restrained.  
 5 Defence.  
 6 It is submitted that the defence in section 1(3)(c)  
 7 of the Protection from Harassment Act 1997 has not been  
 8 established by Mr Curtin. He has not established that  
 9 the pursuit of the conduct complained of was reasonable.  
 10 It is submitted that the closest Mr Curtin came to  
 11 pursuing this line of defence is when he put it to the  
 12 claimants' employee witnesses in cross—examination that,  
 13 one, they must understand why the term "Puppy killer" is  
 14 used and, two, they must expect some level of protest  
 15 given the controversial nature of the business of the  
 16 first claimant and the industry in which it is engaged.  
 17 Neither of those points, even if established, amount  
 18 to a defence. In particular, one, the conduct  
 19 complained of as amounting to harassment is not the  
 20 shouting of abuse such as "Puppy killer". Rather, such  
 21 abuse is relied upon only as an aggravating factor.  
 22 Therefore, even if it is the case that it may be  
 23 reasonable to shout "Puppy killer", which is in any  
 24 event denied by the claimants, that is not a defence to  
 25 the tortious acts of trespass and obstruction that are

1 relied upon for the purposes of the harassment claim;  
 2 and, two, even if the first claimant and its staff  
 3 should expect protest, which the claimants do not  
 4 accept, the first claimant and its staff have a right to  
 5 expect that protest to be lawful. It is submitted that,  
 6 as the acts of protest that are complained of have gone  
 7 beyond that which is lawful, Mr Curtin cannot avail  
 8 himself of the reasonableness defence.

9 Conclusion.  
 10 It is submitted that the conduct complained of,  
 11 those being the parasitic tortious acts and the two  
 12 stand-alone incidents complained of, have crossed the  
 13 line between that which is unattractive and unreasonable  
 14 on the one hand and that which is oppressive and  
 15 unacceptable on the other. That submission is made on  
 16 the basis of, one, the unrelenting nature of the conduct  
 17 relied upon for the parasitic harassment, at least until  
 18 that conduct was restrained by way of an interim  
 19 injunction; two, the targeting of that conduct  
 20 exclusively at the first claimant's staff and members of  
 21 the second claimant class; three, the forcing of the  
 22 first claimant's staff and second claimant class to  
 23 listen to the protest message, especially by way of the  
 24 so-called "ritual", and denying them their basic and  
 25 fundamental liberty not to listen if they so choose;

1 and, four, other aggravating features of the conduct,  
 2 such as the shouting of abuse and name-calling.

3 In summary, applying the six-part checklist in  
 4 Dowson, it is submitted, one, Mr Curtin has engaged in  
 5 a course of conduct targeted at the claimants; two, the  
 6 conduct has caused alarm and distress to the first  
 7 claimant's staff and members of the second claimant  
 8 class; three, objectively judged, Mr Curtin knew or  
 9 ought to have known that the conduct was oppressive and  
 10 unacceptable; and, four, no defence has been made out by  
 11 Mr Curtin to the same.

12 Accordingly, the claimants submit that it is just  
 13 and convenient for the court to grant injunctive relief  
 14 to restrain further acts of harassment, whether pursuant  
 15 to section 3 and/or section 3A of the Protection from  
 16 Harassment Act 1997. Unless restrained by way of an  
 17 injunction, it is likely that Mr Curtin, in light of his  
 18 propensity for committing such acts, will commit further  
 19 acts of trespass [sic] and the claimants reasonably  
 20 apprehend the same -- I think that should be "further  
 21 acts of harassment". Sorry, my Lord.

22 MR JUSTICE NICKLIN: Right. Thank you very much.

23 Mr Curtin, let's take a break and then we'll come  
 24 back with your closing submissions at 11.40. Is that  
 25 all right?

1 MR CURTIN: Excellent.

2 MR JUSTICE NICKLIN: Good.

3 (11.25 am)

4 (A short break)

5 (11.47 am)

6 MR JUSTICE NICKLIN: Right, Mr Curtin.

7 MR CURTIN: I've got an hour now, an hour and a bit, and

8 I need that hour and I need --

9 MR JUSTICE NICKLIN: You take as long as you like.

10 Closing submissions by MR CURTIN

11 MR CURTIN: I am extremely nervous. I'm satisfied -- when

12 I've stood up so far, I'm kind of satisfied with how

13 it's gone. I am overwhelmed, but I'm hoping that it's

14 going to go well and this -- my verbal evidence, it's as

15 if I want to be writing it. This is my evidence to you

16 and I ask you to -- I've got so many notes. You

17 wouldn't believe the amount of notes I've got here. But

18 if you could pay -- not that you won't, but my

19 statements and every single word that I gave in

20 evidence, I'll stand by it.

21 Right. So I don't know where to start. If I was to

22 give a talk to a bunch of school children or a big load

23 of people, I'd give them the same warning that I give

24 you now of like I go off on tangents, but there will be,

25 hopefully, by I'd say 4 o'clock, maybe 3 o'clock,

1 something to hold it together. I haven't got an order

2 of play but I'm going to kind of depend on

3 Caroline Bolton's -- I'm going to go through that, but

4 there's things I want to say first and I don't bloody

5 know what. But I've got some level of notes.

6 So, first of all -- and I've been sort of joking

7 with the opposite team here, opposite team, and I think

8 the goalposts have moved a little bit as we've gone on.

9 I was astounded to hear today that one of the

10 allegations against me is not causing alarm, harassment

11 and distress by "Puppy killer", "Shame on you". No, now

12 it's just shouting. That leaves me in a strange feeling

13 that I've got no discount for how much effort I've tried

14 to put into the witnesses, you know, like, "Do you

15 understand there's people who would ..." -- not, say,

16 "We're going to get you. You monsters. I hope you

17 suffer eternally. I hope someone comes for you in your

18 bed"; no, saying "Puppy killer", "Shame on you". But

19 now the case against the sort of MBR protestors is that

20 it didn't seem to matter what you shout. I could be

21 shouting, you know, "Have a heart", and someone next to

22 me is screaming their heads off and I'm hearing the case

23 is a very similar case. That doesn't resonate.

24 There's lots of things about this entire case. The

25 entire case does not resonate with me. The only way it

1 resonates me is that I feel I've been targeted.  
 2 Barristers -- and I used to call it "the Curtin factor"  
 3 years ago -- I get dragged into cases because of my  
 4 criminal record and I get dragged into cases because  
 5 I do things like this and I'm happy to publicly speak  
 6 and I can come across as their leader. I'm not their  
 7 leader. I'm not -- no one's leader. But I feel I've  
 8 been targeted in this case.  
 9 I want to talk about the trespass first. The whole  
 10 case of me here is like seven counts of trespass and  
 11 I've listened to the persons unknown. I've never  
 12 defended myself. I've come to this court, this  
 13 building, since 1984, of injunctions. And when I used  
 14 to get injunctions -- I remember I've got one from  
 15 Huntingdon and I think it even appears in textbooks. If  
 16 you put in Google "Curtin and Huntingdon", it comes up  
 17 and there's all these legal challenges. I never made  
 18 those legal challenges. I went up outside the gates and  
 19 I ripped it up and I said, "Here, I'm not meant to be  
 20 here. Come and arrest me", because my memory of these  
 21 procedures -- you see, I go off already -- is this  
 22 paperwork was originally designed to protect women.  
 23 I remember it. Would I be correct in that?  
 24 MR JUSTICE NICKLIN: The Protection from Harassment Act?  
 25 MR CURTIN: Yes.

1 MR JUSTICE NICKLIN: It was originally introduced to counter  
 2 stalking but Parliament went a lot further than that.  
 3 MR CURTIN: It did. The Daily Mail had a year of stories  
 4 about women being stalked. I looked at those Daily Mail  
 5 stories and I knew what was coming, this sledgehammer  
 6 that used to get used against protestors, and I do  
 7 believe -- I was definitely one of the first people in  
 8 Britain to have that legislation and that's why I ripped  
 9 it up because I am ... ah, so there's many surreal  
 10 things. The persons unknown is a mindblower, and that's  
 11 why I never defended these cases because I thought I'm  
 12 going to come up with persons unknown anyway and the way  
 13 it used to get used was -- it used to destroy the whole  
 14 campaign. It led in no way out the way it used to be  
 15 implemented.  
 16 You've said to me that a lot of things have changed  
 17 since then, such as Articles 10 and 11, and I thank --  
 18 not thank -- I am deeply grateful that we got you as  
 19 a judge -- not because -- you're a judge, you know,  
 20 you're like -- I've sort of joked a bit -- you're grumpy  
 21 with me and you're grumpy with that side, but you're  
 22 fair. That's the thing. And I haven't come across fair  
 23 judges before. And you seem to have a belief in  
 24 Article 10 and 11 that -- "You should just go protest  
 25 over there and be quiet" -- no, you seem to be able to

1 deal with an adult, that people shout and scream on  
 2 a demo and do these lively things, which in the past,  
 3 no, everything is unacceptable unless you're over there,  
 4 completely quiet.  
 5 But I'm engaging in it. And what do I find though?  
 6 The evidence against me relies on seven cases and it was  
 7 more. At the start of the trial they've taken off some  
 8 of the trespasses and it tends to be the ones where  
 9 they've accepted, I think, I was saying -- I was saying  
 10 to the other protestors, "Come on, let's let the workers  
 11 in". I'm sure there's cases against me at the start of  
 12 the case, trespass cases, that are not there now. But  
 13 I've got seven.  
 14 So, right, I look into defending myself and,  
 15 remember, let's talk about the strangeness of the case.  
 16 These are cases, most of them -- apart from two where  
 17 I step over the mythical -- no, it's not mythical. It  
 18 did exist, that metal line -- where I've gone up to the  
 19 gate and I've banged on the gates. They're two  
 20 outstanding. The other cases against me are on the  
 21 driveway when I didn't even know that it was  
 22 trespassing. But you look at the evidence and I've  
 23 looked, and it's strict liability. That means that  
 24 there's no defence. But I've told them I've found  
 25 a defence, but it's not available to everyone. In fact,

1 I've been quizzing them, "What do you think my defence  
 2 is?", and there is a defence and I'll ask you -- well,  
 3 no.  
 4 Well, there is a defence. In this country, I --  
 5 well, I'll get to it -- there's one person who can come  
 6 on to anyone's land, spill a cup of tea over, shout  
 7 abuse and walk off and they can never get them for  
 8 trespass. It's not a policeman, it's not -- and I'll  
 9 just cut straight to it. My only defence that I could  
 10 actually come up and get found -- there's no "Not  
 11 guilty" or "Guilty" in this, but it's like, I don't  
 12 know, not proved -- is the King. Is that true, that the  
 13 King can trespass?  
 14 MR JUSTICE NICKLIN: I don't know.  
 15 MR CURTIN: That's what I read in one of the summaries. Is  
 16 that true? I think it's true. And that's the only  
 17 person in this country that can stand up and go "No" and  
 18 then sit down. I kind of have to accept a "Guilty" in  
 19 strict liability, don't I? But there's aggravating  
 20 circumstances, aggravating --  
 21 MR JUSTICE NICKLIN: Well, it is what it is. A strict  
 22 liability tort like trespass, yes, okay, if you trespass  
 23 on somebody's land and somebody proves that you've  
 24 trespassed on their land, the next question is, "And  
 25 what happens now?". So the court ultimately has to

1 decide what to do about that and there are remedies in  
 2 the civil courts which principally consist of  
 3 injunctions to say "You mustn't trespass again" or to  
 4 give damages. But the court isn't going to award  
 5 anything like -- well, I'd be surprised if the court  
 6 awarded more than about 50p if you'd stepped on  
 7 somebody's land and then you stepped off it again.  
 8 I mean, it's just -- the damages element would be  
 9 neither here nor there really .  
 10 MR CURTIN: But you said it, but the 50p -- but the 50p  
 11 could become a symbol, you know, and for the famous --  
 12 MR JUSTICE NICKLIN: Well, it is because our law of tort  
 13 works on the basis and our civil system of justice works  
 14 on the basis that where the relevant party has shown  
 15 that he or she or it has been the victim of a civil  
 16 wrong, the court usually grants a remedy to that even if  
 17 the remedy is merely nominal. It is by way of the court  
 18 acknowledging that the tort has been committed.  
 19 MR CURTIN: Okay. But I'm here to defend myself and as  
 20 a person who's chosen -- the path I've gone down is one  
 21 of -- I don't like that generic term. I'm going to use  
 22 it -- a protestor, I need to fight for that right to  
 23 protest. And now with the current -- there seems to be  
 24 wave after wave of new legislation aimed at protesting.  
 25 The last one -- well, there's been the two last acts.

1 The last act that's been passed seems to be all the  
 2 worst stuff that was rejected by the House of Lords in  
 3 the first package of the new public order bill . So I'm  
 4 here to defend myself, but I'm also here and I'm proud  
 5 that I'm here to defend the right of protest and I don't  
 6 want that nominal 50p. I don't want a penny. I don't  
 7 want --  
 8 MR JUSTICE NICKLIN: You don't need to worry about that  
 9 because -- she'll correct me if I'm wrong -- Ms Bolton  
 10 is not actually pursuing a claim for damages in relation  
 11 to trespass. What they're interested in is an  
 12 injunction .  
 13 MR CURTIN: Okay, and what I want to do is use the 50p as  
 14 a symbol, not because I don't -- as we'll go through  
 15 Caroline's -- I think I'll do that at the 1 o'clock  
 16 thing. She says I've got a lack of insight, a lack of  
 17 ... no, no, no, I would argue that I don't have a lack  
 18 of insight but I will be asking you for no restraint .  
 19 We'll talk about that or maybe -- yes, I'll have to  
 20 address that at some point, but because I don't feel  
 21 I've done anything wrong -- I've been involved in  
 22 a crazy situation, a crazy period of my life. I made  
 23 mistakes --  
 24 MR JUSTICE NICKLIN: Well, let me ask you this question:  
 25 would it make an enormous difference to your life if

1 I were to grant an injunction that prohibited you from  
 2 trespassing on MBR Acres' land, bearing in mind that,  
 3 going forward, it 's going to be obvious because it's  
 4 going to be painted on the ground in big yellow paint or  
 5 some other striking colour to say, "This is the MBR  
 6 land"?  
 7 MR CURTIN: I want to be like -- you know this -- I want to  
 8 be -- I am reasonable and I've come to every hearing,  
 9 but give an inch and -- I don't want to give the inch,  
 10 even, but I understand. You're going to do what you're  
 11 going to do and --  
 12 MR JUSTICE NICKLIN: Well, I'm going to do what I think --  
 13 ultimately, Mr Curtin, my obligation is to apply the law  
 14 fairly and to reach a fair decision on the basis of the  
 15 evidence that I've got. Now you may disagree -- and you  
 16 wouldn't be alone -- in thinking the law of trespass has  
 17 certain aspects to it that are difficult for people to  
 18 understand and the idea that there's an absolute right  
 19 to exclude people from that strip of land that's  
 20 immediately outside the gateway to the Wyton site, but  
 21 that's the law and I can't change the law. I have to  
 22 apply the law. But the question is whether that makes  
 23 any big difference to you. I mean, I know it's  
 24 symbolically --  
 25 MR CURTIN: It is, only really. I think that's what we're

1 going to depend on here. Well, because I genuine -- and  
 2 I will put it to you that I don't -- I'm a person --  
 3 I know why I'm here, I understand, and we watched the  
 4 videos and, you know, like there's definitely something  
 5 needs addressing here. But it will be my case that I do  
 6 not need restraining, but we've spent millions and  
 7 millions and millions of pounds. I've come here for all  
 8 this paperwork --  
 9 MR JUSTICE NICKLIN: Tell me why I don't need to grant an  
 10 injunction. Why would I not need to grant an  
 11 injunction?  
 12 MR CURTIN: Because -- about what? You would have to give  
 13 me a particular --  
 14 MR JUSTICE NICKLIN: Well, trespass, for example.  
 15 MR CURTIN: Aggravated trespass --  
 16 MR JUSTICE NICKLIN: Never mind about "aggravated". Just  
 17 the ordinary -- the law says that you are not entitled  
 18 to go on to MBR Acres' land without their permission.  
 19 MR CURTIN: Okay.  
 20 MR JUSTICE NICKLIN: They're not going to give you their  
 21 permission. We can work on that assumption.  
 22 MR CURTIN: Okay.  
 23 MR JUSTICE NICKLIN: And they say in the past you have gone  
 24 on to their land without their permission and they want  
 25 an injunction to stop you doing that in the future.

1 Now, I can tell you that ordinarily that would be  
 2 a reasonably good civil claim. Now, sometimes the court  
 3 says, "Well, actually, Mr Curtin now knows that he's not  
 4 allowed to trespass on that land and the court doesn't  
 5 actually think that there's a likelihood that you're  
 6 going to do so again", and if the court is satisfied as  
 7 to that, it may refuse an injunction in an exercise of  
 8 discretion on the basis that there's no need for an  
 9 injunction, you now understand the limit of where the  
 10 claimants' land is and you're not going to trespass on  
 11 their land in the future.  
 12 MR CURTIN: But prior to the injunction -- and I will bring  
 13 it up again -- I've got a pretty, really deep  
 14 understanding compared to most people about the laws on  
 15 trespass.  
 16 MR JUSTICE NICKLIN: Hmm--hmm.  
 17 MR CURTIN: So apart from the two outstanding events  
 18 where -- and they both -- they do both involve a little  
 19 heated atmosphere. There was some aggravating  
 20 conditions for me. One, "Open the effing gates", it had  
 21 gone for three hours and I was really in a position  
 22 where, "Don't you dare blame us for not getting these  
 23 dogs some water and being cleaned". So some cloud of  
 24 mist went over me in that situation and I was prepared  
 25 to -- so I'll have to answer that as why that shouldn't

1 happen again.  
 2 Then there's another case of me stepping over the  
 3 line and pointing at a security guard and that's all  
 4 you've seen. There's no witnesses, but it looks to me  
 5 like -- yes, so Mr Curtin has got a good understanding  
 6 of all the criminal laws on trespass and I know one  
 7 about -- what I can and can't do with this injunction  
 8 anyway. I know -- there's no case of me deliberately  
 9 stopping a vehicle. We'll talk Anglian Water. We will  
 10 address Anglian Water.  
 11 MR JUSTICE NICKLIN: Okay.  
 12 MR CURTIN: So there's no evidence that, for example, I've  
 13 gone into -- let's keep it about trespass or  
 14 obstruction. So there's no evidence that I've  
 15 deliberately tried to block vehicles.  
 16 MR JUSTICE NICKLIN: Well, let's keep off the vehicles at  
 17 the moment. Let's deal with trespass.  
 18 MR CURTIN: Okay.  
 19 MR JUSTICE NICKLIN: Are you telling me that you are not  
 20 going to stand on the strip of land that we now know is  
 21 owned by MBR Acres?  
 22 MR CURTIN: Ah, well, my point to you is like I'm -- I don't  
 23 want to -- I want to be reasonable but why -- do you  
 24 know I talked to you before about the flowers at the  
 25 gates? Forget about the flowers at the gates -- flowers

1 at the line. Some option for me to go over it. I see  
 2 it as a punishment from the court that I would not be  
 3 allowed to do that.  
 4 MR JUSTICE NICKLIN: No, no, well I'm not going to ever say  
 5 anything about laying flowers. I might prohibit where  
 6 you can lay them, but only in the sense that if I impose  
 7 an injunction, it will be a trespass injunction that  
 8 says you can't trespass on their land.  
 9 MR CURTIN: But you have to base it -- as long as you can  
 10 base that on the fact that I banged on the gates, I went  
 11 "Open the effing gates" -- because that's the only time  
 12 I'm really conscious -- I didn't even do it then  
 13 consciously but a little -- let's call it a little --  
 14 not -- because you'll write it down -- a pink --  
 15 a slight pink mist, you know. So I need an injunction  
 16 maybe for those times when -- but I've got a really --  
 17 I've got a good understanding of civil proceedings.  
 18 If I was not granted any conditions today -- to be  
 19 honest and I want to be careful what I say -- it would  
 20 put me in such a bizarre, weird, awkward situation.  
 21 It's not like I'm inviting you to give me the same  
 22 conditions as everyone else, please, because then I'll  
 23 have to explain -- "How come John is over the road,  
 24 laying some flowers, and no one else can?", and I'd be  
 25 like, "Oh, no. Here I go again".

1 But on my actions, do I need -- upon those two  
 2 moments, is there really a -- is there a likelihood that  
 3 Mr Curtin is going to storm the gates, to go on the  
 4 roof, to cause them any trouble at all? I would say  
 5 there's not. I don't need that to stop me going on the  
 6 property. There's the slight bit of evidence there,  
 7 I don't want to diminish it and I accept that.  
 8 I wouldn't -- how can I call them? They're not  
 9 conscious because they're done with -- but maybe that's  
 10 an interesting view, that when Mr Curtin gets  
 11 agitated -- like, as I say, if a van comes out, a dog  
 12 van, there's definitely some red mist there. But even  
 13 in that red mist situation, I've proved since the  
 14 injunction that -- and this injunction would -- there is  
 15 going -- I don't know if there is going to be any sort  
 16 of persons unknown. So basically my point to you -- but  
 17 that would be my final submission and I need to go  
 18 through the evidence -- is, like, don't give me any --  
 19 MR JUSTICE NICKLIN: Your submission is it's not necessary  
 20 to grant you an injunction having regard to what you've  
 21 actually done in terms of trespass --  
 22 MR CURTIN: Yes.  
 23 MR JUSTICE NICKLIN: -- and the likelihood of you causing  
 24 further acts of trespass in the future?  
 25 MR CURTIN: Yes, and the only reason I think -- it would

1 just seem, "Oh, come on, they've spent £4 million. You  
 2 need to give them something". No, I don't want --  
 3 I would ask you not to. I would ask you for me to have  
 4 no restraints on me with this injunction. It might --  
 5 it's a strong thing to ask and it's not because I lack  
 6 insight. It's because of exactly my conduct and we're  
 7 going to go through that at some point.  
 8 So I've got these seven trespass things that I can't  
 9 even -- we'll come to that. But, again, it puts me in  
 10 that like persons unknown. I want to know who I'm  
 11 fighting. Let's get on to that. Let's get on to the  
 12 justice of I'm sitting here and on the paperwork is  
 13 MBR Acres and Bantin & Kingman.  
 14 Well, let's begin by Bantin & Kingman. I don't know  
 15 if I have to address you any longer than ten seconds  
 16 about Bantin & Kingman. Half of the injunction wants to  
 17 restrain me from going there or -- no -- gives me the  
 18 same restraints as MBR. I've never been to Bantin &  
 19 Kingman.  
 20 MR JUSTICE NICKLIN: Okay. Well, you've got a better point  
 21 on that. So this is paragraph 1(b). You've never  
 22 trespassed on the land at the Hull site.  
 23 MR CURTIN: Never trespassed, never gone there, never had  
 24 a conversation about it.  
 25 MR JUSTICE NICKLIN: Okay. Got that.

1 MR CURTIN: Strike it. Strike it from the record because  
 2 it's a nonsensical charge, but we need to go back to it  
 3 now. So who am I -- who have I been protesting about in  
 4 Camp Beagle? I've been there, across the road, and  
 5 it's -- on the paperwork it's "MBR Acres". Bear with me  
 6 because I need to know -- you know, these are the  
 7 victims. MBR Acres, according to this, are the victims.  
 8 The main body of evidence was offered to you by --  
 9 I won't go on about this too long -- was offered to you  
 10 by Susan Pressick, who is from Bantin & Kingman, and she  
 11 has some managerial role for her boss -- what are we  
 12 going to call them? -- let's call them Marshall  
 13 BioResources, Marshall Farm Group Limited,  
 14 Scott Marshall in America.  
 15 Who should have represented this case, according to  
 16 me? If I felt like I had a fair trial -- if I really  
 17 had to fight against MBR Acres -- I've had to fight,  
 18 according to the paperwork, against Mr Markou. That's  
 19 the man who has put himself on the paperwork. That's  
 20 the man who should have been here to represent  
 21 MBR Acres. Under cross-examination, which I'll come to,  
 22 he didn't know what it meant. He didn't even know --  
 23 the thing he signed. Do you know he hasn't even read  
 24 Susan Pressick's statement? I'll come to this in  
 25 a minute. I'm glad you've got a sharp mind because

1 people lose me in my concentration because there will  
 2 be -- even this little bit about who we're up against.  
 3 Let me get the chronology of it. This case is  
 4 brought -- okay, let's say it's MBR Acres. There was  
 5 a point where Jane Read -- Now I haven't called  
 6 Jane Read as a witness and the reason I haven't called  
 7 her is common decency. The woman is terminally ill.  
 8 I don't know how ill she is. I didn't call her.  
 9 There's one bit in her statement which I'd like to take  
 10 her up on, but I ask you to put that into perhaps --  
 11 well, there is a pattern of all the witnesses, the way  
 12 they've been -- they've judged me. As I put to  
 13 Witness V, my reputation went before me. I've been  
 14 judged on my reputation.  
 15 But Jane Read, she did some work on the case. She's  
 16 ill. Susan Pressick seems to be the one taking over  
 17 Bantin & Kingman. She approaches the MBR Acres -- kind  
 18 of -- whatever it is, "Okay, we need someone to sign --  
 19 we need someone to be the first claimant". Mr Markou,  
 20 from his clear evidence is like, "Okay, I'll do it",  
 21 like a volunteer.  
 22 What she immediately then says -- so the same woman,  
 23 Susan Pressick, who is not MBR Acres -- she gets Markou  
 24 to put -- I put it in my -- whatever they say,  
 25 a respectable submission -- he puts his hand up --

1 "I need a volunteer"; "I'll do it". Nearly in the same  
 2 sentence, on the same day, in the same moment, she says,  
 3 "Could you write all your responsibilities of what  
 4 you're about -- what you just volunteered to over for  
 5 me. I want to represent now. So who can be a volunteer  
 6 for MBR Acres?". Markou puts his hand up. She then  
 7 says to him, "Could you sign this bit of paper giving  
 8 all your responsibility to represent the directors, the  
 9 employees and the contractors over to me?". That seems  
 10 like untoward. I don't feel like MBR Acres has driven  
 11 this show. Mr Markou certainly didn't.  
 12 When Mr Markou gave evidence, I felt like I was  
 13 addressing him as just another worker. I did not  
 14 feel -- and I will go through some of the things he  
 15 said -- I wasn't -- he didn't know what the directors --  
 16 he didn't know that "officers" meant "directors". He  
 17 had spoken to two contractors, I think he said, and  
 18 everything was vague. Every single witness I spoke to  
 19 in this case from MBR had a vagueness about them. He  
 20 was so vague. To find out what happened, "How come  
 21 you've ended up in this role?" -- I'm sorry for  
 22 waffling, but it doesn't feel like to me that  
 23 Mr Markou -- he didn't even read -- that's what he  
 24 said -- he didn't even read the statement that  
 25 Sue Pressick has compiled for everyone on behalf of

1 MBR Acres. Am I making some point here --  
 2 MR JUSTICE NICKLIN: Yes.  
 3 MR CURTIN: -- any point at all, that I'm against -- who  
 4 should be on the paperwork, who are the victims,  
 5 definitely the financial victims, Marshall Farm Group  
 6 Limited, the people in America, and they've made it  
 7 appear on the paperwork like it's MBR Acres and Bantin &  
 8 Kingman. They are the financial losers and they are the  
 9 people that are -- it wouldn't make any sense -- where  
 10 is it? -- MBR Acres have taken out this  
 11 multi-million-pound court case but they don't -- you're  
 12 only talking about a company with profits in the hundred  
 13 thousand pounds. The real victim in this case is  
 14 Scott Marshall and he's running this case, not the  
 15 claimant, not the -- I don't feel like -- if Mr Markou  
 16 was there to represent MBR Acres, represent the  
 17 directors, the employees and the contractors, I don't --  
 18 I think -- it's an unimpressive case with unimpressive  
 19 witnesses that I'm not bowled over and everything about  
 20 this case runs through it.  
 21 There's this like -- there's a high -- not "high".  
 22 It's hard to get at. I was going to use a term like  
 23 "talking to the witnesses" -- and I don't wish to be  
 24 ironic or anything -- it's like getting blood out of  
 25 a stone, you know, and it's not -- whereas I get ... --

1 you do not have to worry about me if I get upset. I am  
 2 extremely tired and it -- I was going to say it's like  
 3 getting -- You know the point I was going to make. In  
 4 this case we've talked about blood and it's been like  
 5 getting blood out of a stone. Who is funding it? Why  
 6 am I here? Did you write this statement of your own  
 7 volition? Is it all your own ...? It's been such  
 8 a hard job. There's only one witness in the whole  
 9 thing -- I thought the Production Manager, she seemed to  
 10 bang out some answers. Everyone else, it was like,  
 11 "What do you mean by that?". It was hard work.  
 12 So my point is I do not feel like Demetris Markou  
 13 was in any way capable of representing the first  
 14 claimant [sic] and we can see from the arrangement it's  
 15 Sue Pressick from Bantin & Kingman. So I hope I've made  
 16 that case there, that I feel really underwhelmed by the  
 17 actual truth of the nature of the paperwork, who is  
 18 pursuing me.  
 19 Right. I'll tell you what, we'll try -- let's go  
 20 through this statement now. I'm just going to go  
 21 through it in chronological order and hopefully, by  
 22 doing it this way, I can cross-reference my mad  
 23 professor notes. Hang on. I've got a few ... I've got  
 24 list beyond list beyond list. For example, you know  
 25 I talked about Production Manager, and this is my

1 opening bit, before I go into the witness. You're  
 2 talking about the answers they've given -- the  
 3 statements, they were all terrified of me, scared, the  
 4 things I said, they all felt targeted by me -- so many  
 5 of them felt targeted by me. They all said -- but when  
 6 we get down to it, Susan Presswick -- and I'll go  
 7 through some other answers -- very much a generic,  
 8 targeted -- "I didn't feel targeted", I think she said.  
 9 The Production Manager, "How did you feel about  
 10 ..."; "No, not personally, I haven't been ..." -- this  
 11 is the evidence against me -- "I haven't been targeted.  
 12 It's more of a generic attack"; "Yes, you stood there  
 13 for a brief moment in front of the car. We all got the  
 14 same treatment"; "No, I've not been stopped at any  
 15 point from ever leaving or the drone hasn't stopped our  
 16 work". That's why I said I remember the Production  
 17 Manager. I could get some answers out of the woman that  
 18 were plain and simple.  
 19 I'm going to -- I will go through each individual  
 20 witness because that hasn't been done in the statement.  
 21 But to begin with, like when I've analysed their  
 22 statements, we began with terror and in relation to me  
 23 there's not one single -- apart from Witness V that  
 24 actually, when it came down to it, accused me of some  
 25 conduct that was capable of causing real alarm and

1 distress. They reported it in their statements, but by  
 2 the time I got them in the witness box and was able to  
 3 engage with them, I don't think there's one witness --  
 4 maybe the ones that stuck in their sort of -- I was  
 5 going to say, if I can just say, belligerent or hanging  
 6 on to their answers -- "Well, I just did feel  
 7 personally"; "But you've heard the car in front and  
 8 behind getting the same sort of thing"; "But I just  
 9 did". And they're allowed to -- and I would like to say  
 10 one thing. I never took away any witness' -- I tried  
 11 not to -- to diminish the fact that they were feared  
 12 [sic].  
 13 So in Caroline Bolton's thing of me, it's got my  
 14 lack of insight into people and I do -- I know it, I --  
 15 for me -- we'll come to it in here -- for me what's  
 16 normal of 40 years of being around megaphones and being  
 17 around police and being around sirens, where other  
 18 people have gone, "Oh, my God", for me, it's like  
 19 "What's the time?". So I'm acknowledging -- that is my  
 20 insight and I'm acknowledging -- when I joined  
 21 Camp Beagle, oh, my God, you know, I'm with these  
 22 people. Most of them have never been on a demo before.  
 23 I'm kind of in my comfort zone. These are people who  
 24 have just found out about, as far as they're concerned,  
 25 the horrors of vivisection. They're absolutely hopping

1 mad.  
 2 But, for me, I'm like literally -- you know, like,  
 3 I'm not bored, but this is a routine scene, but for  
 4 other people it's like -- it's either exciting or  
 5 terrifying. So my insight isn't to be flippant about  
 6 what other people feel, but it's to give you some ...  
 7 ah, Witness V, now I read -- when I said I was up to  
 8 3.30 last night, I think 2 o'clock last night -- and  
 9 I am a ...  
 10 MR JUSTICE NICKLIN: Are you okay?  
 11 MR CURTIN: I'm fine. I am a human being and I've got  
 12 feelings.  
 13 MR JUSTICE NICKLIN: I know that.  
 14 MR CURTIN: I went through all the transcriptions and I got  
 15 some help from some people, but I still had to go  
 16 through them myself. I didn't want to go through V's  
 17 because I don't want to read about his terror. I don't  
 18 like being a terrifying person.  
 19 MR JUSTICE NICKLIN: Let me summarise, Mr Curtin, what  
 20 I think came across from the line of cross-examination  
 21 you took with the employees, which is to say, "I don't  
 22 challenge how you feel about this". What you tried to  
 23 do gently with the witnesses was to say, "You work at  
 24 a controversial facility. To an extent you've got to  
 25 expect there to be protestors and our protest activity

1 has been ..." -- you didn't use these words, I'm putting  
 2 these words into your mouth -- "pretty routine, it  
 3 doesn't have very much by way of surprise or" -- it's  
 4 not that you do random things to people. Essentially  
 5 the rhythm of your protest has remained pretty constant.  
 6 MR CURTIN: Hmm, mine, yes.  
 7 MR JUSTICE NICKLIN: It's gone up and down depending on the  
 8 number of people that are present on any day --  
 9 MR CURTIN: Yes.  
 10 MR JUSTICE NICKLIN: -- and some days the number of people  
 11 who are present and also to an extent the conflicting  
 12 interests that the protestors as a group have -- some of  
 13 them think they should adopt more aggressive tactics;  
 14 others of them don't think that -- and so there are  
 15 days, depending on who is there and what mood captivates  
 16 the majority of the crowd, that it will take on its own  
 17 dynamic. But your submission to me is that the protests  
 18 that you've been involved in has been pretty much what  
 19 you've called "the ritual".  
 20 MR CURTIN: Yes.  
 21 MR JUSTICE NICKLIN: It's challenging and confronting the  
 22 workers every day and there has been some degree of  
 23 innovation. I mean, for example, the idea of a funeral  
 24 march and things, which is one way of you trying to  
 25 inject some novelty into the proceedings to make it

1 slightly different -- but it's not like a radically  
 2 different change. It's not that one day you've got  
 3 some, I don't know, water cannon or things like that.  
 4 To an extent the workers knew that your activities  
 5 were going to be pretty predictable. They were going to  
 6 come in to the facility, they were going to get shouted  
 7 at, they were going to be delayed, but they would get in  
 8 and they would get home at the end of the day. You  
 9 didn't blockade them in for hours and hours and hours  
 10 and your position has been to the witnesses that, "Well,  
 11 that's just -- you've been subject to a protest message.  
 12 I'm sorry that you feel how you feel, but in order for  
 13 us to be able to have our meaningful protest, to an  
 14 extent you've got to get used to this".  
 15 MR CURTIN: Hmm. There's -- I spoke to a Mr -- Mr Kipley,  
 16 one of his reluctance about coming to the camp is to --  
 17 it's not the style. When Animal Rising goes somewhere,  
 18 it's very soft, they've got an energy to be soft, and he  
 19 finds it a bit harsh from looking -- even him, looking  
 20 at the video, "Ra-ra-ra-ra", which now goes on behind a  
 21 sort of line, but it's still ...  
 22 I think what -- I've got a line of it and hopefully  
 23 when I go through this afternoon the evidence, which  
 24 I've got -- there's one witness and I haven't got it to  
 25 hand and I think she gave a good description. Maybe it

1 symbolises the view of the workers, of like, "All right,  
 2 you lot, you're against experiments, you want to ban it,  
 3 you talk about petitions and going to Parliament".  
 4 I think the way she put it was like "giving us grief";  
 5 "We're at the bottom. We're doing the dirty work at the  
 6 bottom and you're giving us grief every day. Go and  
 7 take it to the people who make decisions". And I get  
 8 that and there is an element at the camp -- and there's  
 9 definitely so many people I met, especially  
 10 straightaway, who definitely wanted to empty all of  
 11 their -- and a lot of them, just finding out about these  
 12 things, and they wanted to let rip on the workers.  
 13 And my -- the impact I was able to have -- and  
 14 I could take you to the 13th -- was just working with  
 15 that. So I have partaken in the "Ra-ra-ra-ra" and, as  
 16 a willing participant, we've got to say, that's me, I'm  
 17 there, but it's definitely one of -- in my case, the  
 18 evidence against me, I'd say -- ah, I'll come to it.  
 19 What I think I'll do is I'll start going through  
 20 this because I have to get through it at some point.  
 21 MR JUSTICE NICKLIN: Okay.  
 22 MR CURTIN: But there's talk of control and I shouldn't be  
 23 allowed to have control as a protestor.  
 24 MR JUSTICE NICKLIN: You don't need to worry about that  
 25 because you're not being sued in any capacity which



1 makes you answerable for others. The only thing that it  
 2 is and it's -- you want to rely upon it because you say  
 3 that it shows, contrary to the image that's being  
 4 portrayed of you, that in fact you have taken steps to  
 5 try and facilitate the workers going into the -- on  
 6 occasions.  
 7 MR CURTIN: Yes, and I've worked with people who are  
 8 screaming their heads off and they're like "They're not  
 9 going home"; "Really? They're not going home? Are you  
 10 going to make a stand here then? Do you know there's  
 11 such a thing as a police force? You might stay there  
 12 for an hour but they're really not going home?".  
 13 But the workers weren't to know that. All they get  
 14 from me is like "ra-ra", another person. But I was  
 15 actually doing another role so maybe -- ah, so when it  
 16 came to V --  
 17 MR JUSTICE NICKLIN: Well, it wasn't entirely altruistic  
 18 because you told me very clearly -- and I understand  
 19 this -- which is you had an interest in the protest  
 20 remaining vibrant, in the sense of it being there --  
 21 MR CURTIN: Yes.  
 22 MR JUSTICE NICKLIN: -- and that if people broke the law and  
 23 got arrested and bailed away from the site, that takes  
 24 your protestors away.  
 25 MR CURTIN: Yes.

1 MR JUSTICE NICKLIN: So from a simply self-interested point  
 2 of view, you had a direct interest in making sure that  
 3 people did not get arrested because otherwise you lose  
 4 the personnel.  
 5 MR CURTIN: Yes, I mean, you're picking up on something  
 6 there. I don't know how -- whether this will be used  
 7 against -- but in my evidence I'm not trying to be  
 8 careful what I'm saying, I'm not trying to be careful --  
 9 I've been to jail. I've partaken in these proceedings.  
 10 If you'd have given me -- this sounds terrible, but if  
 11 you'd have given me 10,000 people with pitchforks who  
 12 wanted to shut MBR down, like in Italy -- if the whole  
 13 community -- I don't know at that point if I'm going to  
 14 be going, "Stop, get back, you'll all get arrested and  
 15 it will be over".  
 16 MR JUSTICE NICKLIN: No, I know that.  
 17 MR CURTIN: I talk about let's deal with what --  
 18 MR JUSTICE NICKLIN: You were dealing with what you had.  
 19 MR CURTIN: Yes. So the 10,000 people with pitchforks,  
 20 I may change my view on -- yes, but I wanted to work on  
 21 something that's sustainable and I'm proud beyond  
 22 proud -- yes, I'm really proud of the work at  
 23 Camp Beagle and this is like a criminalisation of it.  
 24 This is me standing next to people going "Blurgh" with  
 25 me getting involved in the "Blurgh", but what about --

1 and it's not their job obviously, but if you took it as  
 2 a snippet, it's like that's all we do. We get up in the  
 3 morning, shout, go back to sleep and then shout. But  
 4 behind that there's so much work goes on, so much  
 5 fantastic work, really hard work, research and  
 6 interesting projects.  
 7 The reason -- one of the main reasons, I do believe  
 8 by -- ah, this will -- is this -- what I'm saying --  
 9 because I'm going to go with my sort of confidence --  
 10 has this been help -- am I doing some sort of  
 11 presentation at the minute?  
 12 MR JUSTICE NICKLIN: Yes.  
 13 MR CURTIN: I acknowledge -- and I've tried to say what --  
 14 this is like a neighbour dispute, more than anything,  
 15 I'd say, and we -- I used to write to the solicitors and  
 16 they asked me, "Please stop saying it", when I first  
 17 used to write to them -- "Dear neighbours from hell",  
 18 and they used to write back, "Stop calling us ..." --  
 19 and I'd write back, "Okay".  
 20 But we are like -- there is bad blood. I use that  
 21 term. There is -- we've chosen to be there and these  
 22 constant neighbour disputes, even though we've --  
 23 I've chose to live there and --  
 24 MR JUSTICE NICKLIN: You can understand how they feel.  
 25 MR CURTIN: Pardon?

1 MR JUSTICE NICKLIN: You can understand how they feel?  
 2 MR CURTIN: Yes, I understand how, even if we hadn't the  
 3 "Ra-ra-ra-ra", just us being there.  
 4 But the reason I've said this and one of the reasons  
 5 I'm proud is because us being there, we have -- and  
 6 I have noticed it -- in the two years we've put  
 7 vivisection -- we've captured public imagination.  
 8 They've kind of had -- some people might look at us and  
 9 see "Layabouts", "Get a wash", "All them paid by the  
 10 Kremlin", "Political activists". Then the other people,  
 11 that's people beeping their horns, other people come  
 12 over for a cup of tea. We've captured their imagination  
 13 and because we -- we had to be somewhere and we're  
 14 outside the breeders of these puppies for vivisection  
 15 and we've acted as a springboard. We've captured  
 16 imagination and people have felt for us.  
 17 So -- and we talk about puppies and it's important  
 18 here. There is a puppy factor going on here. I never  
 19 felt such reluctance -- I never felt such reluctance in  
 20 all my life. If we'd have been outside  
 21 a slaughterhouse, to kill pigs -- not that MBR -- it's  
 22 not that -- their primary business always ends up with  
 23 the dogs being killed at some point of their breeding  
 24 cycle. They go from the cage to the lab and they are  
 25 killed after -- in this country, with the regulatory

1 procedures, with the toxicology, there is a post-mortem  
2 procedure for every dog. But never -- if we're outside  
3 a slaughterhouse, do you kill pigs? I wouldn't have got  
4 the reluctance I got here. We know what we're doing.  
5 Let's call it the "puppy factor".

6 So this company, they do something which is  
7 inherently controversial. Our links with -- there's  
8 millions of animal experiments, millions. I don't  
9 believe the statistics and they don't tell you the  
10 amount of animals that are bred that are not used, but  
11 we're talking millions. But with dogs, as I say --  
12 I don't want to use it alone, but it's 4,000, which you  
13 could say, "Well, it's not that bad", but one dog  
14 experiment would break people's hearts.

15 But MBR Acres, you're going to have to deal with it.  
16 You managed to hide -- I say they managed to not be  
17 there -- they've been in the public arena for a long  
18 time. I go back with this company to -- 1990 we raided  
19 it --

20 MR JUSTICE NICKLIN: Well, the previous companies. There  
21 have been several over the years.

22 MR CURTIN: Yes, yes, and they were subjected to, in terms  
23 of protest, what can happen; you know, some action, they  
24 get some publicity, it dies down. I think one of the  
25 paradoxes of this case is that I think what's really

1 worn the workers down and the company and Scott Marshall  
2 in America -- they could cope with us for a day, they  
3 could have -- if it was five days -- if it was people  
4 with pitchforks, as long as they had the police there to  
5 protect them they can cope with the chaos of a mental  
6 day, a week of action. I think what actually waters  
7 them down is our continual presence, which we talk  
8 about, but it's continual legal presence. So by my  
9 role in -- curbing the illegal activity has been  
10 a tactical ...

11 Right. While we've got a bit of time, I'm going to  
12 start making progress on this.

13 MR JUSTICE NICKLIN: And you made the point -- you made the  
14 analogy with the Greenham Common camp, that one way of  
15 effectively communicating a protest message is to  
16 demonstrate your commitment to it by being physically  
17 present for weeks and weeks and months and months and to  
18 be just there, and that was the protest strategy,  
19 amongst others, that was used at Greenham Common and  
20 it's a well-recognised method of communicating a protest  
21 message.

22 MR CURTIN: Yes, and in one of -- I've sent -- in  
23 a randomised way I've sent stuff into the witness  
24 bundle, one of those videos -- and it doesn't matter if  
25 I stop talking because I feel a bit emotional.

1 Honestly, do not have any emotional sympathy apart from  
2 the (inaudible). But I'm going to be fine.

3 MR JUSTICE NICKLIN: It's all right. I'm very well trained  
4 for that.

5 MR CURTIN: Good. One of them is like a mid-winter scene.  
6 It's like literally minus 9 degrees, there's two of us  
7 there, we're breaking the water off, but we're talking  
8 about parliamentary petitions. We're not talking about,  
9 "The workers are coming out. We're going to shout at  
10 them and give them a horrible day". We talk about all  
11 the important work we're doing and you see how -- when  
12 it's minus 9 degrees, we should make more livestreams  
13 because the sympathy goes out to us.

14 So I understand that this company really -- they  
15 tried to get rid of us and the reason I'm pleased you're  
16 here -- I don't know if another judge would have -- but  
17 you've clearly said to them, "You're not getting  
18 a Harlan injunction". That's what they wanted. That's  
19 what the money -- I think there was -- I've got no  
20 evidence at all. For me, Christ, say if we talk about  
21 the police -- you know, we're a headache to these people  
22 for one reason. Forget about whether it's legal or  
23 illegal. We're a headache. To the police, we're like,  
24 "Pfff", the Highways Agency, they're like -- say as far  
25 as the police are concerned -- and I'm talking off the

1 top of my hat [sigh], I don't know if -- on the persons  
2 unknown day, I don't know if you caught me laughing my  
3 head off when you said something to Ms Bolton, "I don't  
4 want to tell the police their job but did they ever  
5 consider making arrests?". I remember you said that.  
6 And Cambridgeshire Police, I've always viewed them as  
7 perhaps -- I don't know why it is. I don't know whether  
8 it's because they're next to Cambridge University and  
9 they get a lot of academics working amongst them or  
10 something -- but quite a liberal police force compared  
11 to, like, Liverpool, Manchester, London where there's --  
12 you know, in a lot of other parts of the country, if you  
13 had a protest camp, the police are going to turn up, you  
14 know, and they're not going to be too happy.

15 But the police, thank God, they -- I arrived -- you  
16 can see the opening scenes when I arrived. I think  
17 I arrived -- my evidence is I arrived on the 12th, so  
18 there's a video from 13 July and it's complete -- and  
19 there's people camping. These people are hopping mad,  
20 you know. They're like -- you can imagine from a police  
21 point of view what a nightmare we were, let alone on the  
22 days when we bring loads of people.

23 I can't tell you -- well, let's keep it to the  
24 police. I know -- well, it's not evidence, but  
25 Ms Bolton doesn't have to be standing up -- thank God --

1 I'm glad she's not standing up because I dare say  
 2 everyone has to be dead polite -- you didn't do it  
 3 deliberately but you did do a lot of interfering and  
 4 standing up when I was talking to Pressick and the first  
 5 three or four witnesses, and that was the ones -- I was  
 6 uncomfortable and it actually did disrupt my flow. So  
 7 I am not making this closing statement to be music to  
 8 your ears.  
 9 Could you remind me what I was going to say?  
 10 MR JUSTICE NICKLIN: You were talking about the police --  
 11 MR CURTIN: The police.  
 12 MR JUSTICE NICKLIN: -- and you said that you were  
 13 a nightmare to them.  
 14 MR CURTIN: Ah, yes, because it's not evidence. The police  
 15 have been having a go at the Highways Agency, to the  
 16 Highways Agency, "Get rid of them"; the Highways Agency  
 17 to the police, "No, you get rid of them". I think what  
 18 happened, a lot of people waited, they waited and they  
 19 hoped that the Harlan injunction was going to come along  
 20 and -- because with the policing -- and this is why  
 21 I don't need a restraint because I'm already aware of  
 22 the conduct -- I'm aware that there's such a thing as  
 23 the police force and at some point, no matter how long  
 24 it takes, you sit in front of a road, a copper is going  
 25 to -- in the Cambridge Police, we went through lots of

1 scenarios. We went through -- you can sit on the road  
 2 for six minutes, 59, mate, in front of that car, and the  
 3 copper will tell you, "If you're there after seven  
 4 minutes, I'm going to nick you". Bizarre. But I sort  
 5 of sat back and went, okay, along with it.  
 6 But my whole waffly point about this is that we're  
 7 a nightmare for this company, just the fact that we're  
 8 there, however well we -- they might say they've got no  
 9 problem with us there. Come on, you're a company.  
 10 You're making money from -- it hasn't got big neon signs  
 11 at the place. My testimony would be it was secreted  
 12 away in the countryside -- "Now we're there, deal with  
 13 us". But I accept that we're a nightmare. But we were  
 14 definitely a nightmare with the police and that's why  
 15 I engaged every single day there.  
 16 It didn't make me very popular amongst other  
 17 activists. People at the camp, we -- it wasn't my  
 18 decision to talk to police liaison. We used to have  
 19 a meeting every day and there was a consensus kind of  
 20 thing, no matter even if some people are like "F the  
 21 police" and "Don't talk to the cops", no, we're going to  
 22 talk to the cops. I'm beginning to waffle a bit.  
 23 The whole -- why did I start saying about this? I'm  
 24 sorry.  
 25 MR JUSTICE NICKLIN: That's all right.

1 MR CURTIN: Yes, there was definitely a bit of a batting  
 2 game going around, "You get rid of them"; "No, you get  
 3 rid of them", and I think -- it's anything so what's the  
 4 point of saying it, but Caroline Bolton standing up,  
 5 "That's not evidence", I know, but you're able to  
 6 listen. But they did not get the Harlan thing. And now  
 7 we're down to like ... let me think.  
 8 MR JUSTICE NICKLIN: Often, in many areas, people look for  
 9 simple answers to complicated problems. One criticism  
 10 that could have been laid at the Harlan injunction was  
 11 it looked for a simple answer, but the simple answer it  
 12 found was a disproportionate interference with the  
 13 protest rights of a very large number of people. It was  
 14 never going to be a realistic prospect and the same is  
 15 true with policing protests. The fact that you've  
 16 referred to the police officers saying you can sit down  
 17 in front of a car for seven minutes, that's  
 18 a bright-line rule. It's looking for certainty as to  
 19 what you can and can't do and I'm afraid there isn't  
 20 going to be any certainty about what people can and  
 21 can't do in the context of protest because everything  
 22 depends on the circumstances.  
 23 MR CURTIN: Yes.  
 24 MR JUSTICE NICKLIN: If you sat down for seven minutes on,  
 25 you know, the central lane of the M25 motorway at 9.00

1 in the morning, you would cause absolute chaos. If you  
 2 sat down in the road, a B-road, somewhere in the  
 3 Outer Hebrides at 2.00 in the morning, you could sit  
 4 down for two hours and not cause any disruption at all.  
 5 So there isn't a rule that says --  
 6 MR CURTIN: No.  
 7 MR JUSTICE NICKLIN: -- "You can sit down on the highway for  
 8 seven minutes", but I understand why somebody might like  
 9 to try to find -- because then everybody knows where  
 10 they stand. If the police officer says, "You can sit  
 11 there for however long", and there's a sort of agreement  
 12 that is, "Okay, we'll do that and then we'll stop", then  
 13 the police know, "You're doing what I'm asking. I'm  
 14 trying to accommodate the tension between the  
 15 protestors' rights and those who are being protested  
 16 against". The problem is that searching for bright-line  
 17 rules like that is hopeless in an area like this.  
 18 MR CURTIN: Yes, and I'm not a child. That's why I've asked  
 19 for no restraint. I've got an understanding that there  
 20 is such a thing as a criminal law. I'm not too aware of  
 21 the new protest laws, but from a glance they seem "Oh,  
 22 my God". But let's say -- maybe it helps Mr Curtin --  
 23 MR JUSTICE NICKLIN: Mr Curtin, if you go back -- and you're  
 24 old enough to remember what the original Public Order  
 25 Act provided by way of -- the powers that the police

1 were given to control protest even under the Public  
 2 Order Act of 1986 were pretty revolutionary at the time.  
 3 MR CURTIN: Yes.  
 4 MR JUSTICE NICKLIN: But as with many things in our society,  
 5 the rules are one thing. It's the enforcement of the  
 6 rules that's the next and it can be as important as what  
 7 the rules are. So there's a very important role that  
 8 the police discharge in our society about, yes, they  
 9 have a battery of powers that they can use against  
 10 people who are causing disruption, some of those have  
 11 been added to by the most recent legislation, but the  
 12 police don't lack powers to deal with those who are  
 13 disrupting life or the highway, ranging from arresting  
 14 people for breach of the peace, for example.  
 15 MR CURTIN: Yes.  
 16 MR JUSTICE NICKLIN: I mean, you can just take people out of  
 17 a situation that's overheating. Sometimes arresting  
 18 people will make the situation worse, but that's what  
 19 the police have to assess themselves.  
 20 MR CURTIN: Yes and Caroline Bolton, I think, as we'll come  
 21 to it when I do go through it, she suggests that,  
 22 "Perhaps Mr Curtin could do with a few of those  
 23 guidelines" and "As a protestor, not that he could do  
 24 with them, Mr Curtin is someone who needs restraint.  
 25 Because of his behaviour, if he doesn't have the

1 restraint, he'll go over it. He's a man who clearly  
 2 displays ..." -- I would argue the kind of opposite,  
 3 that I've got a pretty good understanding of criminal  
 4 law, maybe not the latest legislation, what I can and  
 5 cannot do. But I want to strike a balance here in that  
 6 on one respect you make my life easy by giving me  
 7 childish things that I can and can't do, but I don't  
 8 want to invite that. Do you understand?  
 9 MR JUSTICE NICKLIN: Yes, I know. I mean, from my point of  
 10 view, the exclusion zone is an example of trying to find  
 11 certainty in an uncertain -- and it has its downsides  
 12 because the downside of an exclusion zone is that it  
 13 is -- has the capacity to prohibit lawful behaviour. It  
 14 is not my function as a judge to prohibit lawful  
 15 behaviour.  
 16 MR CURTIN: Yes.  
 17 MR JUSTICE NICKLIN: I can do it if I'm driven to that  
 18 position, that there's no other way for me that I can  
 19 find effectively to prohibit unlawful behaviour, is to  
 20 impose a measure which unfortunately also, as a side  
 21 effect, has some restrictions on lawful behaviour but  
 22 I try to keep those to a minimum.  
 23 Now, that's what can be said about the exclusion  
 24 zone. The virtue of the exclusion zone is very clear.  
 25 Everybody knows what the rule is and everybody knows if

1 it's been broken. The downside of the exclusion zone is  
 2 it prohibits potentially lawful behaviour and the court  
 3 is generally not in the business of doing that.  
 4 MR CURTIN: Okay. And this bit here is the whole crux,  
 5 that -- and I don't want to say anything -- I want to be  
 6 relaxed what I say. I don't want to give something,  
 7 "Look, he said it" -- is that it won't change my life.  
 8 In fact it might make my life easier if you give me the  
 9 simple rule book, "You can't do this", but I'm not  
 10 inviting you to do that. It would make my life simpler,  
 11 but why should I invite you to --  
 12 MR JUSTICE NICKLIN: The principled response to Ms Bolton's  
 13 case, leaving aside what you've said to me this morning  
 14 about, "Actually an injunction is not necessary because  
 15 I don't threaten to do these things" -- the  
 16 straightforward, principled way of responding to the  
 17 claim against you is to make you subject to an  
 18 injunction which prohibits you from trespassing on the  
 19 MBR Acres land at the Wyton site and from obstructing  
 20 vehicles going in and out of the facility.  
 21 MR CURTIN: Okay. Then -- but then you take away what is  
 22 a kind of ancient right. What about the picket line?  
 23 What about the little -- and I even called it an  
 24 "ambush" and I was really nervous. I know things come  
 25 out of my mouth. I think I said to my sister the day

1 before that it was like an ambush of me and the two  
 2 sweet-looking women. But as I talk about it when we  
 3 come to Anglian Water, that -- you talked to  
 4 Caroline Bolton about it, but you're criminalising  
 5 trespass. This would then criminalise the old  
 6 picket line idea and it's persuasion. I'm surprised to  
 7 see persuasion so much used. Maybe it's got a different  
 8 meaning within harassment.  
 9 MR JUSTICE NICKLIN: No, it has the same --  
 10 MR CURTIN: (inaudible -- overspeaking).  
 11 MR JUSTICE NICKLIN: It has the same meaning, but,  
 12 importantly, in the Harassment Act it has to be in  
 13 conjunction with the harassment. So the harassment --  
 14 a person must not pursue a course of conduct amounting  
 15 to harassment by which he intends to persuade. So there  
 16 is an important element which is you must not harass  
 17 people to persuade them to do this.  
 18 MR CURTIN: Okay, yes.  
 19 MR JUSTICE NICKLIN: That's important in harassment, to  
 20 recognise those two have to go together before it  
 21 amounts to a civil wrong. Persuasion on its own is not  
 22 criminalised --  
 23 MR CURTIN: So if I can --  
 24 MR JUSTICE NICKLIN: -- or otherwise made unlawful.  
 25 MR CURTIN: Give me the 10,000 people with pitchforks and

1 then let's talk about how restrained or not restrained  
 2 you want to be. Give me the real world --  
 3 MR JUSTICE NICKLIN: No, let's not get deflected away from  
 4 this point because it is important. Your point about  
 5 picket line, which I understand, which is you say it's  
 6 an important part of your protest right to seek to,  
 7 let's say, flag down a vehicle that's entering the Wyton  
 8 site and say, "Excuse me, could I hand you this  
 9 leaflet?" --  
 10 MR CURTIN: And hopefully have a really good positive --  
 11 MR JUSTICE NICKLIN: That's right. You hope to engage them,  
 12 you hope to persuade, you hope to communicate your  
 13 message.  
 14 MR CURTIN: Yes.  
 15 MR JUSTICE NICKLIN: Now, do you recognise that you can't  
 16 compel somebody to take your leaflet or to listen to  
 17 your message?  
 18 MR CURTIN: Well, put Anglian Water please to one side,  
 19 absolutely 100%.  
 20 MR JUSTICE NICKLIN: You can let me make the assessment of  
 21 what took place with the Anglian Water incident --  
 22 MR CURTIN: Yes.  
 23 MR JUSTICE NICKLIN: -- but let's use the Anglian Water  
 24 incident as a useful example --  
 25 MR CURTIN: Okay, yes, because it happened.

1 MR JUSTICE NICKLIN: -- because if I had granted an  
 2 injunction that prevented you from obstructing vehicles  
 3 entering or leaving the Wyton site, then that would have  
 4 got you into trouble potentially.  
 5 MR CURTIN: Yes, and -- well, I wouldn't have come up with  
 6 the idea. If the injunction was there, I wouldn't have  
 7 said to the two women, "Tell you what, I'll slow him  
 8 down, you smile, 'Like a leaflet?'". The injunction  
 9 would prevent me from doing that. I'm not inviting you  
 10 to give me that restriction. I've never -- I can't see  
 11 any reason --  
 12 MR JUSTICE NICKLIN: The problem, Mr Curtin, is I've got to  
 13 find a remedy, if I'm satisfied on the evidence I've  
 14 seen, which is there are too many incidents in the  
 15 footage of you obstructing vehicles, slowing them down.  
 16 The consequence of that is that this is -- I described  
 17 it in the injunction judgment back in 2021 -- the  
 18 flashpoint. What then ensues is the surrounding of the  
 19 vehicles --  
 20 MR CURTIN: Yes.  
 21 MR JUSTICE NICKLIN: -- the shouting at the occupants and  
 22 what they find to be intimidating and harassing.  
 23 MR CURTIN: Yes.  
 24 MR JUSTICE NICKLIN: Now, the short point is the law says  
 25 you shouldn't be obstructing those vehicles.

1 MR CURTIN: Yes, I've been -- there's plenty of footage of  
 2 me. I've taken part --  
 3 MR JUSTICE NICKLIN: -- in the ritual, and the ritual was,  
 4 "Delay their exit. Subject them to the message".  
 5 MR CURTIN: Yes, and "Hold them up for minutes".  
 6 MR JUSTICE NICKLIN: Yes.  
 7 MR CURTIN: I'm not talking about that and I'm not doing  
 8 this in order to make a clever point. I'm taking --  
 9 please don't take away -- against -- do what you're  
 10 going to do in your persons unknown, which I always feel  
 11 like I'm part of anyway. You may say I'm not part, but  
 12 I am. I'm a classic persons unknown.  
 13 I know, if you don't grant any restraint against me  
 14 tomorrow, if I go and sit on the road and obstruct the  
 15 thing, you don't even have to name me, you can do me  
 16 for contempt. I know about that injunction. I can  
 17 never ... so I can be dealt with in that way. But don't  
 18 make an example of me. I want to be tried on what I've  
 19 done. I'm asking you not to --  
 20 MR JUSTICE NICKLIN: You will have heard me repeatedly say  
 21 to Ms Bolton what the evidence against you is. I will  
 22 decide the case on the evidence against you and only the  
 23 evidence against you. You don't need to worry about  
 24 that.  
 25 MR CURTIN: Okay.

1 MR JUSTICE NICKLIN: But you need to recognise that the  
 2 evidence against you does include a large number of  
 3 incidents where you can be seen to be obstructing  
 4 vehicles as they enter or leave the Wyton site and the  
 5 law is you can't do that.  
 6 MR CURTIN: Yes, but then we go back to the  
 7 Stepford Wives -- we do. We go back to the perfect  
 8 thing. I need to defend my right to protest. There are  
 9 lots of videos of me partaking -- it's more to do with  
 10 the company I'm keeping. I'm not blaming the other  
 11 people. I'm definitely with a load of people whose  
 12 express wish is to take it out on this car, for example.  
 13 MR JUSTICE NICKLIN: Yes.  
 14 MR CURTIN: And hopefully you've understood and the  
 15 opposition has understood. I kind of believe, unless  
 16 Mr Curtin was sinister, directing them all really, that  
 17 I've got no -- you're dealing with someone who does not  
 18 want -- has partaken in rituals but is someone who gives  
 19 you no -- I've got no intention. It's not part of the  
 20 campaign to obstruct vehicles. I have obstructed  
 21 vehicles and the reason I was there -- and I'm glad  
 22 I was there. If I hadn't been there, I am sure there  
 23 would have been a lot more destruction -- obstruction.  
 24 MR JUSTICE NICKLIN: Hmm--hmm.  
 25 MR CURTIN: So I do defend the right, as the workers are

1 coming in, if -- we could say "If" all day -- if we had  
 2 have behaved ourselves as a little -- it was impossible.  
 3 I talked to you about herding cats. If you could go  
 4 back in history and we had all kept to the verges and we  
 5 had "Puppy killers", "Puppy killers", I personally --  
 6 yes, I don't -- I'm asking not to punish me too much --  
 7 MR JUSTICE NICKLIN: I'm not punishing you.  
 8 MR CURTIN: I know it's not a punishment, but to take away  
 9 my right to flag a vehicle down just as you've seen in  
 10 videos --  
 11 MR JUSTICE NICKLIN: That's different and you've got to look  
 12 at these as potentially a package of measures which  
 13 would be -- for example, I might take away the exclusion  
 14 zone and subject you only to the restrictions on  
 15 trespass and obstruction of vehicles. That would then  
 16 enable you -- leave aside what persons unknown  
 17 injunction might prohibit -- if you stood on the public  
 18 carriageway, not obstructing vehicles and you sought to  
 19 engage drivers who are entering the Wyton site in  
 20 conversation to say, "Do you realise what this facility  
 21 does? Can I hand you a leaflet, blah blah blah?  
 22 Would you give it to your boss?", the law doesn't  
 23 prohibit that and you might be able to carry on -- if  
 24 that were an injunction I granted, you wouldn't be able  
 25 to stand in front of that vehicle leaving or exiting as

1 a way of making that person listen to your protest  
 2 message or receive a leaflet, but my order might not  
 3 restrict you from attempting to engage that driver in  
 4 conversation.  
 5 MR CURTIN: I was -- I never knew whether to go down this  
 6 avenue. Actually I think you've got a real -- you've  
 7 got a very difficult job here.  
 8 MR JUSTICE NICKLIN: I know!  
 9 MR CURTIN: That's my submission at the minute. Don't take  
 10 away -- the lorries coming from Germany and the fact --  
 11 and he's on the wrong side of the road and I can't --  
 12 because, according to MBR's submissions, there is no --  
 13 this right of coming and going, there's no anomalies to  
 14 it. There's no way out of it. "Free passage" literally  
 15 means "free passage". And my role while I was there was  
 16 to do exactly that -- I would say exactly -- I've been  
 17 there to allow the free passage. It might not look at  
 18 it --  
 19 MR JUSTICE NICKLIN: Okay, Mr Curtin, yours and my view  
 20 about free passage is not going to agree on this. What  
 21 I have looked at in videos is not free passage of these  
 22 vehicles. It has been the deliberate slowing them up in  
 23 order to subject the occupants to a protest message.  
 24 That is not free passage. I accept it's not a total  
 25 blockade. That didn't happen. But materially those

1 workers and anybody else entering that facility did not  
 2 have free passage. They were essentially subject to  
 3 such conditions as the protestors wanted to impose on  
 4 them, and that's not a right that you have.  
 5 MR CURTIN: No, and I took part in that, but I would invite  
 6 you -- there's a man who -- I haven't -- I'm glad I've  
 7 remembered to bring this bit in. I talked about the  
 8 police being a headache. So the police went from  
 9 six minutes 59 to -- and when I use -- I touched upon  
 10 it -- "With the drum, we want to go round to the  
 11 40 sign"; "No, you're going to go down to -- that far",  
 12 I didn't want to go to the 40 sign, I didn't want to go  
 13 to the bend, but I've got behind me, if I can say, loads  
 14 of people, "Ra-ra", and I've got to go back to them with  
 15 some --  
 16 MR JUSTICE NICKLIN: You're negotiating.  
 17 MR CURTIN: Yes. That was why I was doing it.  
 18 MR JUSTICE NICKLIN: That's a good example. The people who  
 19 stood in front of that vehicle -- the video I saw of the  
 20 woman with her interaction with the police officers,  
 21 walking at snail's pace in front of the vehicles, she  
 22 was obstructing the highway, plain and simple. She  
 23 obviously thought that as long as she was physically  
 24 moving one foot in front of the other, she's not  
 25 obstructing the highway. She's wrong about that.

1 MR CURTIN: Good. Two minutes and I'll finish on this  
 2 point. Exactly, the police went from that -- it didn't  
 3 take long -- the police -- it was beginning to dawn on  
 4 the police at some point, after maybe five or six weeks.  
 5 The police started -- like you said, they started  
 6 putting their trousers on or tying their boot laces up,  
 7 shining their boots, and it went from 6.59 to "joo joo  
 8 joo joo joo joo joo" -- it came down to zero. Any  
 9 obstruction -- they said, "One person puts one cage on  
 10 here, you'll be arrested"; any obstruction. That's what  
 11 they were -- by the time the last two people were joined  
 12 on, Lauren and Louise Boyle, that was in the era of --  
 13 when we were told by the police, "If there's any more  
 14 obstruction here, you've collectively blocked it now".  
 15 So the police were dealing with it in a fluid way and  
 16 I know about the police.  
 17 MR JUSTICE NICKLIN: Yes.  
 18 MR CURTIN: I have to explain to people all the time at the  
 19 camp, "Do you realise ..." -- because they tell you,  
 20 "I want to do this", "Do you realise there's such  
 21 a thing as the police?".  
 22 MR JUSTICE NICKLIN: Well, all sorts of myths appear to get  
 23 propagated about what the law is and isn't, again back  
 24 to the idea that there is this holy grail of things you  
 25 can and can't do, and those people who thought you could

1 stand in front of a vehicle until the driver said "Get  
 2 out of the way", that's not the law either, but it was  
 3 elevated into this understanding that that's what the  
 4 law allowed. It was wrong.  
 5 MR CURTIN: Yes, and my evidence here, in my closing  
 6 submission, that that was the energy that I worked with.  
 7 MR JUSTICE NICKLIN: I know.  
 8 MR CURTIN: So you're dealing with someone who, as a -- you  
 9 won't be making life easy for me, only notionally, by  
 10 giving me some childish parameters of what I can and  
 11 can't do, but you're dealing with somebody who has a  
 12 really reasonable, good awareness about -- that there is  
 13 such a thing as the British police force and I remember,  
 14 right early on, in many ways this injunction is trying  
 15 to pretend -- you've addressed it -- "You're trying to  
 16 criminalise this, you're trying to criminalise that".  
 17 These things are already criminal and it's as if --  
 18 they've taken us to court as if there's no police force;  
 19 "Please, please help us. We're in this terrible remedy  
 20 and we're getting no help from the police at all". No,  
 21 the police did --  
 22 MR JUSTICE NICKLIN: Well, you've seen  
 23 Superintendent Sissons' witness statement. You've got  
 24 the evidence. The police did arrest people. They used  
 25 their powers proportionately in response to what they

1 perceived to be the correct measures to adopt in  
 2 response to the protest.  
 3 MR CURTIN: I think this would be a good place to break and  
 4 I just want to -- it's going to be painful for you to  
 5 read this back, but I'm going to get down to some of the  
 6 evidence. The main point I want to get across in this  
 7 bit is that I'm asking you, because of my behaviour --  
 8 and if you can accept -- yes, you've seen lots of videos  
 9 of me -- if you're going to give me some substance to  
 10 what I'm saying, okay, I understand why, but you're  
 11 dealing with the person who has got an understanding of  
 12 civil law and you're dealing with a person who has got  
 13 an understanding of obstruction of the highway laws, of  
 14 harassment laws. So you're dealing with, in terms of  
 15 the criminal system and in the courts, a kind of  
 16 educated person here.  
 17 MR JUSTICE NICKLIN: A sophisticated consumer.  
 18 MR CURTIN: A sophisticated kind of protestor, yes, and I'll  
 19 finish on that for now.  
 20 MR JUSTICE NICKLIN: Right, 2 o'clock.  
 21 (1.02 pm)  
 22 (The short adjournment)  
 23 (1.59 pm)  
 24 MR CURTIN: I'm a mad professor, but is there any chance  
 25 I can borrow a pen.

1 Right, I was a bit flustered before, but I took  
 2 a few deep breaths and it's kind of all under control.  
 3 I'm going to go through this to give it some sort of  
 4 presence.  
 5 In summary, the claimants, point number 1 -- so I'm  
 6 going from the closing submissions. I just had to tick  
 7 it. I have committed acts of trespass. I'm conceding  
 8 that I've interfered with the common law right to  
 9 access. There was a kind of trying to put rules to that  
 10 game that I was asserting, but on the surface, yes,  
 11 there's been interference. I want to go into it at some  
 12 point, the point you raised about did it constitute  
 13 a public nuisance, but I'll come back to that.  
 14 MR JUSTICE NICKLIN: There are three categories, trespass,  
 15 interference with the access, which is a private law  
 16 right, and then there's public nuisance, which relies  
 17 upon an obstruction of the highways being a public  
 18 nuisance, and if a public nuisance is caused and  
 19 somebody suffers particular loss as a result of that,  
 20 then they could claim that. That's the last category.  
 21 MR CURTIN: So for point number 2 I guess I have to  
 22 begrudgingly leave as a tick. I accept --  
 23 MR JUSTICE NICKLIN: Yes.  
 24 MR CURTIN: Not because I want to fight every point --  
 25 MR JUSTICE NICKLIN: No, no, it's perfectly sensible for you

1 to do that.  
 2 MR CURTIN: 3 -- we'll come in due course to this -- yes,  
 3 for sure. Not a criminal -- not something a police  
 4 officer under those circumstances -- the police officers  
 5 on the ground didn't constitute it an illegal  
 6 obstruction of the highway, but I've ticked it. I have  
 7 obstructed the highway but not in the full criminal  
 8 element of it.  
 9 Number 4 --  
 10 MR JUSTICE NICKLIN: I think that in your own interests you  
 11 need to separate the two out, which is that you might  
 12 accept that you've obstructed the highway on occasions  
 13 but I'm not sure that you're accepting that you caused  
 14 a public nuisance.  
 15 MR CURTIN: Yes. For example -- but I've gone off at  
 16 a tangent -- there's a video, I think of 13 July, that  
 17 after the workers have gone in -- or in fact the workers  
 18 go -- I think it's the workers going in, there's  
 19 a period where someone is going, "Thank you, thank you",  
 20 and the cars are going "Beep, beep" in the background.  
 21 I have caused traffic jams then, me personally. Some of  
 22 my actions have led to a block-up and I've been  
 23 pleasantly surprised, but I would go back to the puppy  
 24 factor. We're not just "Stop oil", we're not this.  
 25 We've got this puppy thing that seems to give us quite

1 a healthy view in the eyes of the public — yes, there's  
 2 sympathy for us because that's the puppy place.  
 3 So we have caused traffic jams, some minor traffic  
 4 jams, and the people have not — the people, as they  
 5 drive past, "You bloody lot. I'm on my way to take kids  
 6 to football". It's been "Beep beep", a lot of the time.  
 7 I'm not saying all the time.  
 8 On the harassment, yes, I sought to persuade  
 9 workers, but I did not use harassment in the course of  
 10 that. So let's run through.  
 11 Paragraph 4, they talk about — just the fact that  
 12 I've mentioned the fact that in 1990 I went and, as they  
 13 say, I liberated the dogs. It says here this must be  
 14 from my — it is from my evidence:  
 15 "It warms my heart that other people do illegal  
 16 actions."  
 17 And that's a sign — I've come here to sort of  
 18 literally give you my point of view, which might not be  
 19 shared with other people, but I remember — if you  
 20 Google my name on the BBC and the badger cull, I use  
 21 a suitable term now. I get a warm glow — every time  
 22 I hear of a badger trap being smashed, flattened, it  
 23 gives me a warm glow. That's not criminal.  
 24 It doesn't give me a warm glow every time I hear of  
 25 a window being smashed or something like that, but when

1 lives are being saved, yes, even if it's illegal it  
 2 gives me a warm glow.  
 3 The thing about the — it says I rejected the simple  
 4 thing that here — you got in front of Mr Curtin someone  
 5 with one foot in the illegal side of the movement and  
 6 another foot which goes — the one foot with the active  
 7 participation in illegal activities takes place decades  
 8 ago and since then I've had my foot in another camp, and  
 9 it's not as simple as the fact that I grew up.  
 10 MR JUSTICE NICKLIN: Yes.  
 11 MR CURTIN: When I did used to break the law routinely, we  
 12 had these people called the "granarchists"; elderly  
 13 people who were not young punks with mohicans and they  
 14 were sometimes the most ferocious. So it was just my  
 15 attempt to not link youth — youthful rebellion and "Now  
 16 you've gone ..." — no, no, no, there's a whole manner  
 17 of factors that have gone into it.  
 18 is submitted that the evidence clearly showed that  
 19 without the red line of an injunction ... I just spoke  
 20 to my sister now and I'll just talk candidly, that —  
 21 you've asked me, "Will it affect your life if you can't  
 22 trespass on the site anymore?", if you give me an  
 23 injunction. No, it will not affect my life too much if  
 24 you give me exactly the same order as what's in now,  
 25 with the exclusion box. I can still get on with —

1 I was going to say 99% — I can still get on with 99 —  
 2 100% actually with the work I want to do because I've  
 3 never set out to terrify someone, stop a car. It's just  
 4 not been in my battle plan. But I don't want to invite  
 5 you to do it. It won't change my life, but I'm not  
 6 saying, "Please give me those restrictions".  
 7 MR JUSTICE NICKLIN: I know that.  
 8 MR CURTIN: This bit about the way I lack insight, I dispute  
 9 that. What is and what's not reasonable conduct, the  
 10 law often requires, especially with harassment, the  
 11 distinction between the regrettable — when we come to  
 12 Anglian Water finally, that's regrettable. For me,  
 13 personally, it's regrettable. It didn't need to have —  
 14 it was useless, pointless, it was regrettable. It  
 15 wasn't — was it unacceptable?  
 16 MR JUSTICE NICKLIN: I don't think Ms Bolton is suggesting  
 17 that's an act of harassment.  
 18 MS BOLTON: Well, only from the point of view that they're  
 19 parasitic on the ... that's the limit of it.  
 20 MR CURTIN: Okay. This thing about me showing love and  
 21 compassion, which she seems to go a bit ballistic about,  
 22 that I could dare to say that. The actual quote was —  
 23 I'm on the megaphone and I'm talking to the completely  
 24 irate angry crowd that I've got in front of me, with the  
 25 workers coming, "We're going to show them our love and

1 compassion". Then it was put to me by Caroline Bolton  
 2 that, "Am I showing the workers love and compassion?",  
 3 and used a weird example about Thich Nhat Hanh in  
 4 Vietnam, teaching Buddhism to the villagers, knowing  
 5 that they were going to have to fight Americans. But  
 6 when you have to fight a battle — and I'm not talking  
 7 using violence, I'm talking warriors, you can still have  
 8 love and compassion. And I have love and compassion.  
 9 It's my final submission that I do have love and  
 10 compassion, even when I'm shouting. Sometimes maybe  
 11 not, sometimes I get carried away, "Ra—ra—ra", but  
 12 sometimes when I'm going, "Do you know what you're  
 13 doing?", it's gruff and it's sounding bad, but there's  
 14 not hatred in it.  
 15 We started these court proceedings on April 24,  
 16 which was the birthday of Lord Dowding, it was World Day  
 17 for Laboratory Animals, it was named in his honour, it  
 18 was his birthday. He was the chief lieutenant  
 19 commander, whatever — the top man in fighter command  
 20 during the Battle of Britain. There's a man I would say  
 21 who had love and compassion, and he was a fighter. So  
 22 it's not so extraordinary that I can use love and  
 23 compassion. You know, let's have a bit of Jesus, love  
 24 your enemy, you know. Sorry to ...  
 25 They seem to want to make a bit of an example out of



1 me there, paragraph 8:  
 2 "If a leader (or a senior member) of camp cannot  
 3 behave reasonably within the boundaries ... it is  
 4 reasonable for the Claimants to apprehend that others  
 5 may follow suit ..."  
 6 See me as someone who is facilitating. I think you  
 7 may have got it that I was dealing with a herd of cats  
 8 and I could never be the leader of that herd of cats.  
 9 Do I call them "points", these points --  
 10 MR JUSTICE NICKLIN: Points, yes.  
 11 MR CURTIN: The little italics, what should I call them?  
 12 MR JUSTICE NICKLIN: Oh, yes --  
 13 MR CURTIN: I'll just say 8(iii):  
 14 "Mr Curtin appears to hold the belief that his  
 15 status as a protestor permits him to commit civil wrongs  
 16 without consequence, which is simply not the case."  
 17 Well, I've been involved in so many of these type of  
 18 hearings before, but you do live and learn. I didn't  
 19 know before now about strict liability and I'm someone  
 20 who actively does -- I actually -- I always want to  
 21 know. I'm interested in what the boundaries of where  
 22 I come and I will take it to the edge and then that  
 23 might invite these people, "Okay, this man needs an  
 24 edge". I don't, but if there's an edge, then I like to  
 25 know where it is and it makes me comfortable to have an

1 edge. But I'm not asking you to do me a favour by  
 2 giving me lots of childish -- may I just -- if I say  
 3 that as a term, childish restrictions, I'm not inviting  
 4 those. It will make my life easier because then I can  
 5 know where I'm at, but I don't want it -- I'm not  
 6 sure -- I'm sure you wouldn't because you believe in  
 7 Articles 10 and 11, but don't flippantly take away my  
 8 rights. Don't easily -- I'm not offering these rights  
 9 to be taken away on a plate.  
 10 If you're going to impose them on me, then ... yes,  
 11 there's that balance of I don't want to invite you for  
 12 making life simple for my little brain because by doing  
 13 that you're taking that thing about the picket line, you  
 14 know, like --  
 15 MR JUSTICE NICKLIN: No, I understand.  
 16 MR CURTIN: I want to hang on to it.  
 17 Trespass. We've dealt with this really.  
 18 MR JUSTICE NICKLIN: You don't need to worry about trespass.  
 19 MR CURTIN: When it comes to legal arguments --  
 20 MR JUSTICE NICKLIN: Don't worry.  
 21 MR CURTIN: -- and Ziegler, I've got trust --  
 22 MR JUSTICE NICKLIN: Yes, you'll have to leave me to do the  
 23 work on that.  
 24 MR CURTIN: I do have quite a massive high level of trust in  
 25 you that you'll do that, compared to what I might have

1 done with some other judges that I've come across.  
 2 The drone we're dealing with here, the evidence  
 3 against me is that, for sure, I'm saying -- and it was  
 4 the day after the injunction -- on the commentary, "Here  
 5 we are, flying the drone, 50 metres. They tried to stop  
 6 us, the judge hasn't stopped us". So that's -- I guess  
 7 I was doing it consciously -- I was kind of sending  
 8 a message to the other side, not like, "Ha ha ha ha";  
 9 it's like, "We're still here. We're flying the drone.  
 10 It's important we fly the drone".  
 11 Why should we fly the drone? This is a world where  
 12 every drop of information is valuable. The vast  
 13 majority of what they do inside the sheds is inside the  
 14 sheds. There are brief moments when those dogs come  
 15 out. They're perhaps the most interesting bit to  
 16 capture on a drone. It's the puppy factor and there  
 17 have been ten puppies in one trolley which I think is in  
 18 my bundle -- I'd like to think it's in my -- ten  
 19 puppies. We haven't been allowed to go into the animal  
 20 welfare standards in there. There's a -- I can't find  
 21 it. There's a bit of -- it's not legislation -- under  
 22 the Animals (Scientific Procedures) Act there's even  
 23 a section there on trolleys and it says you shouldn't  
 24 put dogs in a trolley where all four feet can't touch  
 25 the ground. That is just -- I'd say, regularly, no one

1 seems to be paying -- animal welfare standards, people  
 2 handling dogs roughly, people handling dogs when --  
 3 a lorry door slams into the face of a puppy, I say,  
 4 doesn't have to be true.  
 5 So countless animal welfare infringements. We are  
 6 the nosey neighbours, the curtain twitcher --  
 7 MR JUSTICE NICKLIN: Yes, can I try and summarise it? One  
 8 of the reasons or the reasons why you fly the drone, the  
 9 two that I think are most important to you that I've  
 10 gathered from what you've said to me, are firstly that  
 11 you feel there is a need for you to be a witness,  
 12 a vigilance, about what's taking place.  
 13 MR CURTIN: Yes.  
 14 MR JUSTICE NICKLIN: That's what you just referred to about  
 15 the manner in which the dogs are cared for, transported,  
 16 so you want to be vigilant about what's happening on the  
 17 site.  
 18 MR CURTIN: Yes.  
 19 MR JUSTICE NICKLIN: The other is a slightly more soft  
 20 aspect, which is about your campaign requires there to  
 21 be -- for you to keep your interest of your audience.  
 22 MR CURTIN: Yes.  
 23 MR JUSTICE NICKLIN: So, for you, John Curtin, to be able to  
 24 report from Camp Beagle, your message will become stale  
 25 if all you could say was, "We're at the camp again

1 today, et cetera, we're fighting the fight", whatever.  
 2 MR CURTIN: Yes.  
 3 MR JUSTICE NICKLIN: There is a need to stimulate interest  
 4 from your audience and to get them coming back to follow  
 5 what you're saying and your message.  
 6 MR CURTIN: Yes.  
 7 MR JUSTICE NICKLIN: One of the ways that you stimulate  
 8 interest is to provide them with updates about what's  
 9 been happening, and that's one of the reasons why you  
 10 have done the video livestreaming. It's in order to  
 11 keep interest alive amongst those who you want to  
 12 recruit to support your protest.  
 13 MR CURTIN: Yes. I'll give you a good example of that which  
 14 happened -- not yesterday because I was here -- the day  
 15 before, when I was at the camp. I spoke to someone and  
 16 I said about giving evidence about the drone and  
 17 I said -- and I was on oath and I was taking it  
 18 seriously -- there was one bit where there are some  
 19 doors that have been left open and that was a really  
 20 unusual chance, "Oh, my God, we can see the dogs", and  
 21 I said that I didn't even know whether I took that or  
 22 not, and the person helped me by saying, "Well, I can  
 23 help you because it was me that took it", and that would  
 24 be a perfect example of social media headlines.  
 25 And this day, in social media, it's like

1 a collective ADHD amongst everyone, attention deficit,  
 2 and you have to keep that -- it's the nature of  
 3 Camp Beagle, boom, bang, bang, bang, which must be  
 4 very troubling for the company. So that's that balance  
 5 of like, "They're just not going away".  
 6 MR JUSTICE NICKLIN: Well, I think you can also point  
 7 probably to -- I mean, if you had a lawyer representing  
 8 you, I think he or she would make the submission that  
 9 the footage that you've obtained via drone is nothing  
 10 that you couldn't have obtained principally to the same  
 11 effect if you'd held the video camera on the perimeter  
 12 fence or if you'd flown the drone around the perimeter  
 13 and not over the site, so essentially the same vigilance  
 14 could be achieved by a different means, but this -- so  
 15 therefore what the claimants are trying -- they're  
 16 trying to use the trespass tort to achieve something the  
 17 trespass tort was never intended to, which is the  
 18 trespass tort doesn't protect you from being filmed, and  
 19 that seems to be the real complaint. MBR Acres' real  
 20 complaint is not that you're flying a drone but that the  
 21 drone is filming them.  
 22 MR CURTIN: The entire Camp Beagle project began with  
 23 a secret filming project which Mr Markou found very --  
 24 he took it personally. He was paranoid, he said, about  
 25 that. And that did indeed show the trolleys and that

1 footage, one of the -- I don't know if you're allowed to  
 2 see it -- the suggested injunction, is that in the --  
 3 MR JUSTICE NICKLIN: I've got it, yes.  
 4 MR CURTIN: There's one bit at the end of that where it  
 5 wants to stop me using surveillance, which is  
 6 a camera -- cameras are -- in order to stop capturing  
 7 the identities of the workers. For example, that  
 8 Daily Mirror footage, I would suggest -- not suggest --  
 9 that the reason those cameras were there was never to  
 10 capture workers' faces; it was to capture what they do  
 11 on the site and the cruelty and the dogs and the wagging  
 12 their tails when they're in the trolley. I never set  
 13 out to demonise a single MBR worker and I'm not going to  
 14 in the future.  
 15 In the acts of trespass, I'm back to defence to  
 16 trespass -- well --  
 17 MR JUSTICE NICKLIN: I don't think you need to worry about  
 18 that.  
 19 MR CURTIN: Well, apart from being the King.  
 20 Evidence, driveway trespasses. There were two and  
 21 there were no serious consequences, I'm putting to you  
 22 now. One, it was "Open the effing gates", and we come  
 23 to the -- I think there's a bit in here where --  
 24 possible defences where I can say there was -- I think  
 25 the Monsanto, is it, the emergency situation? It felt

1 like an emergency at the time, "Open the effing gates".  
 2 We were distressed. No one had consulted us. We wanted  
 3 to let the workers in. There was a complete breakdown  
 4 of -- on days like that, with no police liaison,  
 5 a complete breakdown of any police communication and it  
 6 felt like an emergency to bang those gates, "Get these  
 7 dogs fed and watered and cleaned". It's not our  
 8 position to stop them.  
 9 But there were no -- I'm saying I'm not aware -- of  
 10 the two acts of trespass that I did, I'm not aware of  
 11 serious consequences that were as a result of them, and  
 12 me -- and I'm not dismissing it -- me pointing over to  
 13 the guard, I'm not aware of the serious consequences.  
 14 There's no witnesses from that --  
 15 MR JUSTICE NICKLIN: Yes. As trespass goes, it's trivial.  
 16 MR CURTIN: Yes.  
 17 MR JUSTICE NICKLIN: I think you really need to go to  
 18 page 24 now. I don't think you need to say anything  
 19 more about trespass.  
 20 MR CURTIN: Yes, I'm starting to do that anyway. I haven't  
 21 got anything blanked here.  
 22 I'd like to, if I could -- ah, going back to the  
 23 drone, to follow what the workers do, if there's any  
 24 movement of dogs or trolleys, that's what I'm after.  
 25 There's lots of other reasons to fly the drone, to

1 make a -- like I said, social media, to do a -- to show  
 2 what the site is looking -- to see what it looks like in  
 3 the snow. There's other things, but that would be  
 4 a particular thing of interest, that there's dogs in --  
 5 MR JUSTICE NICKLIN: Yes.  
 6 MR CURTIN: I would like to deal with the fact that the  
 7 drone -- I will have time because I do want to whizz  
 8 through what some of the witnesses said under  
 9 cross-examination. I would ask you to -- again, when  
 10 Susan Pressick talked to you about MBR Acres, she may be  
 11 the big manager of -- I could never quite understand  
 12 what she was, but I don't know -- I dispute the  
 13 authority that Ms Pressick was able to talk about the  
 14 actual day-to-day goings-on on the site, and she talked  
 15 about, because of the drone, they had to stop using the  
 16 trolleys and then they said they use a small van, often  
 17 being used, rather than the open cart. For example, I'm  
 18 not even aware of a small van at the site. They've got  
 19 a big van. I'm not being pernickety. Mr Hardy's  
 20 evidence was much clearer --  
 21 MR JUSTICE NICKLIN: Don't worry. I know. I'll go through  
 22 the evidence carefully, but I know what is the point  
 23 you're making, which is the employees give a different  
 24 story --  
 25 MR CURTIN: Yes.

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1 MR JUSTICE NICKLIN: -- and I will go through and look at  
 2 what they've said about that.  
 3 MR CURTIN: I've got a long list -- I think I made it  
 4 in January of this year and February, which I don't  
 5 think I've submitted in evidence -- countless examples  
 6 of using the trolley.  
 7 The suggestion that I -- because it's against me --  
 8 I used the drone in order to put pictures of the roof on  
 9 social media so someone else can break in through the  
 10 roof is a ... yes, dismiss that.  
 11 MR JUSTICE NICKLIN: Well, the point about the workers  
 12 feeling -- even if they felt that -- because they were  
 13 being observed, they felt that they had to use the van  
 14 even if they did feel that or they had to cover up,  
 15 those feelings would be the same because of the fact  
 16 that they could be seen from the perimeter of the fence  
 17 anyway or if they were seen by a drone that was not  
 18 flying directly over the site.  
 19 So the concerns that they're expressing are not  
 20 products which are the cause -- they're not caused by  
 21 the drone flying directly overhead. They are caused --  
 22 this goes back to the point I made a minute ago, which  
 23 is the real objection is that they're being filmed.  
 24 MR CURTIN: Yes.  
 25 MR JUSTICE NICKLIN: It's not about the drone; it's about

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1 being filmed.  
 2 MR CURTIN: I think Mr Hardy, he dealt with it as an  
 3 invasion of his privacy, and I said, "Well, you're not  
 4 in your bedroom".  
 5 MR JUSTICE NICKLIN: Well, I've mentioned this more than  
 6 once and I've said so in a judgment, which is there are  
 7 different torts that protect that interest and the  
 8 claimants aren't suing on those torts.  
 9 MR CURTIN: I'm still on the drone. Let's talk about flying  
 10 over with the drone. I've given evidence -- and you've  
 11 asked me -- I can't think of a single instance where  
 12 anything I've captured by flying over the drone,  
 13 I cannot capture from this hedge or this hedge.  
 14 In terms of you want to put something that's  
 15 practical, if you were to ban me from flying the drone,  
 16 you could have two options, one to stop me flying over  
 17 and the other one would be a height restriction.  
 18 There's no evidence at all that I've flown the --  
 19 especially the 7 or 8 feet. When he said that, I was  
 20 like, "Frightens the puppies? Pardon? Say that again".  
 21 So if you're going to have a workable solution to  
 22 flying a drone -- or not just me, but imagine we go to  
 23 the persons unknown bit as well --  
 24 MR JUSTICE NICKLIN: Don't you worry about persons unknown.  
 25 Leave me to worry about persons unknown.

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1 MR CURTIN: To stop me doing a contempt, to stop me  
 2 constantly -- not constantly, but, "Mr Curtin, you need  
 3 to ..." -- but for me -- to prevent me -- what's the  
 4 word I'm looking for when you break -- I just said it,  
 5 committal --  
 6 MR JUSTICE NICKLIN: Contempt.  
 7 MR CURTIN: -- contempt -- is that here's the drone, here's  
 8 the site boundary on the ground with the fence, I'm  
 9 flying the drone, and normally when you fly the drone,  
 10 you have it pointed forwards, I've got to kind of -- you  
 11 literally -- there's no signs in the sky. To know where  
 12 you are vertically you have to ... so I have to fly the  
 13 drone -- "It may be unfortunate circumstances,  
 14 Mr Curtin, but because you abused the drone footage,  
 15 you're going to have to put up with it".  
 16 It's just a really -- it's going -- I can see myself  
 17 coming back to court for like -- and how are they going  
 18 to prove that I was above the ground --  
 19 MR JUSTICE NICKLIN: That's a different point. Leave me to  
 20 worry about whether I impose any restriction on drones  
 21 and, if so, what the terms of those restrictions will  
 22 be.  
 23 MR CURTIN: Okay.  
 24 MR JUSTICE NICKLIN: You can rest assured that my objective  
 25 will be, if I do grant any injunction, that its terms

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1 will be clear so that you will know what you can and  
 2 can't do.  
 3 MR CURTIN: Yes. It's in here somewhere, and I was trying  
 4 to think of it yesterday, as I was explaining to  
 5 someone, that — there's a piece in here somewhere,  
 6 which I might come to in a minute, but it's of me  
 7 saying, "When I fly the drone, I don't want the workers  
 8 to know I'm there" — which is a good sign for me for  
 9 harassment, but it's got nothing to do with the  
 10 harassment or anything. I want them to work — what  
 11 I could see is a way that's not trained properly, not  
 12 enough supervision, breaking some guidelines, and if  
 13 I can get them breaking guidelines, I've got another  
 14 headline, another ... I don't want to be seen. That was  
 15 used against me somehow. I can't remember the way they  
 16 do it. I didn't want the bigger flashy thing that was  
 17 visible .  
 18 So I want to be non-invasive, but I also — to use  
 19 the journalistic , yes, so there's — so, if you do stop  
 20 me flying over, then — or any height restrictions,  
 21 I could buy a satellite and use that.  
 22 We talk about the banging on the gate and this is  
 23 like , you know — this sticks out, "Open the effing  
 24 gates". It says:  
 25 "There is no evidence of any immediate and serious

1 danger to life and property."  
 2 I wasn't feeling that at the time. The dogs —  
 3 MR JUSTICE NICKLIN: Don't worry about this. These are  
 4 about theoretical defences to trespass. You aren't  
 5 going to qualify for any of those. Your better point is  
 6 to say that these incidents are not serious. It's not  
 7 like you have broken into the MBR facility, spent two  
 8 and a half hours trespassing, causing damage, et cetera.  
 9 That's a real trespass where, you know, it's more than  
 10 an insubstantial presence on the land.  
 11 If I step into Tesco car park, assuming that I don't  
 12 have licence to go there, I'm technically trespassing,  
 13 but Tesco doesn't suffer any damage, the court is  
 14 unlikely to grant an injunction against me. I used the  
 15 example during the trial that if I choose to walk across  
 16 Tesco car park on my way home one night, because the  
 17 shop is closed, I can't be a customer so I don't have  
 18 a licence to do so, but the trespass is trivial . It  
 19 doesn't cause Tesco any damage.  
 20 Yes, technically I'm guilty of a civil wrong, but if  
 21 anybody ever brought any proceedings against me, the  
 22 circumstances would be that I would be unlikely to be —  
 23 Tesco would be unlikely to be awarded anything by way of  
 24 substantial damages and it would be a question where  
 25 I would probably say to the judge, "Well, okay, if they

1 don't want me to — if I can't walk across the car park  
 2 at night, I won't do it in the future", and then at that  
 3 point the court would say, "Well, we're not going to  
 4 grant an injunction", and that would be the end of the  
 5 matter.  
 6 So, yes, trespass is a technical and strict  
 7 liability tort. What does not follow automatically is  
 8 what happens in terms of what the court will do about  
 9 a trespass and what remedy it will grant.  
 10 MR CURTIN: Yes. I go back to a constant point. It's as  
 11 if — if you've read this paperwork, it's as if there's  
 12 no such thing as a British police force. In this  
 13 case — I can't go around banging on people's gates, but  
 14 in this case there was only security guards on site —  
 15 they weren't even in sight. They were probably in the  
 16 office and it was just a frustrated man.  
 17 Okay, good. We're making progress.  
 18 Public nuisance element.  
 19 MR JUSTICE NICKLIN: Where are you now?  
 20 MR CURTIN: Sorry, page 24.  
 21 MR JUSTICE NICKLIN: Yes, that's the one.  
 22 MR CURTIN: Okay, so no Articles 10 and 11 rights need to be  
 23 balanced. That's correct — is that ...?  
 24 MR JUSTICE NICKLIN: Well, I don't think that is correct.  
 25 When this right is used in the context of a protest, the

1 court would have regard to the Article 10 and Article 11  
 2 rights. The question is how ultimately they would be  
 3 balanced.  
 4 MR CURTIN: Okay.  
 5 MR JUSTICE NICKLIN: It's not like trespass.  
 6 MR CURTIN: So this is the public nuisance — this is the  
 7 correct place to bring up public nuisance?  
 8 MR JUSTICE NICKLIN: No, it's not. Actually that's the next  
 9 chapter. This is — if you could imagine that the law  
 10 says — think of it as like the exclusion zone. The  
 11 exclusion zone is essentially protecting what we have  
 12 referred to here as the common law right to have access  
 13 to the highway. It's providing that from the MBR Acres  
 14 site , people can get on and off the highway.  
 15 MR CURTIN: Yes.  
 16 MR JUSTICE NICKLIN: What you can't do is obstruct that.  
 17 Now, in the worst-case scenario, for example, if you  
 18 were to get a large lorry and you just parked it in  
 19 front of the gates and then took the keys away and left  
 20 it there, you would be blockading the site and that  
 21 would be to commit the tort of obstructing the access to  
 22 MBR Acres —  
 23 MR CURTIN: Yes.  
 24 MR JUSTICE NICKLIN: — and depending on precisely where the  
 25 lorry was, it might also be a trespass and it might also

1 be an obstruction of the highway. But all of this  
 2 depends on the precise nature of where the obstruction  
 3 is.  
 4 MR CURTIN: Okay.  
 5 MR JUSTICE NICKLIN: But, broadly speaking, the law says  
 6 that you are not entitled to obstruct the access to  
 7 a property ---  
 8 MR CURTIN: Yes.  
 9 MR JUSTICE NICKLIN: --- to the highway. This is the point  
 10 that's probably the most important to you because the  
 11 evidence does show that you have, on a number of  
 12 occasions, obstructed vehicles entering and exiting the  
 13 site.  
 14 MR CURTIN: Yes, okay. So in relation to me as to why did  
 15 I do that, I joined on 13 July and I'm joining an  
 16 extremely emotive place where I can see --- for the  
 17 non--altruistic reasons, "This ain't sustainable, the  
 18 police are going to wake up at some point and start  
 19 nicking people". So why was I doing it? Why was  
 20 I interfering? Why was I interfering with their rights  
 21 of free passage? I'm not being cheeky, but by me being  
 22 there I'm kind of facilitating it. I'm involved. It's  
 23 not perfect.  
 24 If we'd have --- say if I'd have hand--selected people  
 25 to have done the protesting, which was the opposite of

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1 Camp Beagle --- we're on the side of a road. Anyone can  
 2 join --- if I'd have hand--selected people to like ---  
 3 every day we plan a different scenario, a legal  
 4 scenario, I can still see some cases where, when the  
 5 workers are coming out at 12 o'clock, noon, midday,  
 6 there will be some form of protest in front of the gates  
 7 to like --- you shouldn't --- nowhere else in Britain are  
 8 the dogs left to be this long. So some slowing up ---  
 9 because I'm kind of --- I'm defending, even though  
 10 it's --- I --- the reason I did interfere was to kind  
 11 of --- the paradox --- was to kind of not completely  
 12 impede ---  
 13 MR JUSTICE NICKLIN: I understand.  
 14 MR CURTIN: To offer some way. But will my campaigning  
 15 skills --- will the Camp Beagle campaign --- will it be  
 16 stopped in its tracks if that --- if this ultimate right  
 17 of free passage ---  
 18 MR JUSTICE NICKLIN: It hasn't because my interim injunction  
 19 has essentially prohibited this.  
 20 MR CURTIN: Yes, but I go back to: are we on the picket line  
 21 here?  
 22 MR JUSTICE NICKLIN: Well, the more interesting question is  
 23 whether merely seeking to engage the driver of a vehicle  
 24 is obstruction. Standing in front of the vehicle is  
 25 obviously obstruction ---

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1 MR CURTIN: It's ---  
 2 MR JUSTICE NICKLIN: --- or holding --- if you held some  
 3 placard in front of the driver's windscreen or his or  
 4 her side window so he or she cannot pull off safely,  
 5 then you are interfering with that person's ability to  
 6 access the highway.  
 7 MR CURTIN: Yes.  
 8 MR JUSTICE NICKLIN: Now, you've made the point which is,  
 9 "I'm not invisible", and so there is a degree of  
 10 interpretation here. The right to have --- the common  
 11 law act, rights of access to the highway, isn't an  
 12 absolute right. It is always going to be subject to,  
 13 you know, daily life.  
 14 I mean, imagine there's a group of 20 ramblers  
 15 coming along the B1030, whatever it's called, there will  
 16 be a short moment while those ramblers obscure the view  
 17 of a driver pulling out and he or she will have to wait  
 18 until those people are out of the way. It would be  
 19 ludicrous to suggest that the person can rush off to  
 20 court and say, "Right, I want to make a claim against  
 21 these 10/20 ramblers because they've obstructed my  
 22 access to the highway". That's just nonsense.  
 23 MR CURTIN: Yes.  
 24 MR JUSTICE NICKLIN: It's all a question of degree. Now,  
 25 the problem for you is it is a problem of degree because

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1 the ritual has involved a repeated act of interfering  
 2 with the access of right to the highway so the claimants  
 3 are in a reasonably strong position to say there have  
 4 been repeated breaches of this right that are more than  
 5 just trivial. They are not a group of ramblers who  
 6 obstruct the view temporarily and don't do so  
 7 deliberately. You, on the other hand, are deliberately  
 8 obstructing the vehicles in order to deliver your  
 9 protest message.  
 10 Now, the law doesn't permit you --- well, not my  
 11 understanding of the law --- doesn't permit you to  
 12 interfere with the right in that direct way.  
 13 MR CURTIN: Yes.  
 14 MR JUSTICE NICKLIN: The more difficult question is  
 15 whether --- if a group of protestors decide to stand on  
 16 the highway outside the entrance to the Wyton site,  
 17 whether mere presence is an interference with the common  
 18 law right of access to the highway and that's where  
 19 I think there's scope for the balancing of the  
 20 protestors' rights against the others'. It all depends.  
 21 MR CURTIN: Yes, and in the evidence submitted against me,  
 22 apart from Anglian Water, which we need to come to, the  
 23 reason I'm obstructing vehicles isn't as clear as what  
 24 it looks. I'm partaking in the ritual which is  
 25 actually, paradoxically, to accommodate exactly what the

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1 workers want, to get home.  
 2 MR JUSTICE NICKLIN: I understand that. I understand that  
 3 you're saying that what you're doing is preventing  
 4 a worse obstruction. You are facilitating them leaving.  
 5 MR CURTIN: Yes.  
 6 MR JUSTICE NICKLIN: But, unfortunately, the analysis I will  
 7 have to engage upon is, when I'm looking at that video,  
 8 "Are you, Mr Curtin, obstructing that vehicle?", and the  
 9 answer is going to be, on the evidence that I've seen,  
 10 "Yes, you are".  
 11 MR CURTIN: Yes.  
 12 MR JUSTICE NICKLIN: Now, the fact that you say you've got  
 13 a good reason for obstructing the vehicle I'm afraid is  
 14 probably not going to cut it because the answer that the  
 15 law will give you is that you don't need to obstruct  
 16 vehicles in order to protest.  
 17 MR CURTIN: No.  
 18 MR JUSTICE NICKLIN: And that's where -- you see, I have to  
 19 keep balancing different people's rights and, if you can  
 20 protest in a way that means that the vehicles are not  
 21 obstructed when they're leaving the site, then the law  
 22 will say, "Well, that's the way it should be".  
 23 MR CURTIN: Okay. With other perhaps named defendants or  
 24 other defendants, you could make a case against them,  
 25 "Oh, you're obstructing day after day and the police

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1 officer, each time we have to move you out the way".  
 2 That's not the case with me. Apart from one -- and it's  
 3 a stand-alone, Anglian Water, which -- I think I even  
 4 said it in my first breath, "I hope Anglian Water  
 5 doesn't come up", and hey presto, it features --  
 6 MR JUSTICE NICKLIN: I wouldn't regard Anglian Water as  
 7 being -- I don't regard it as seriously as you seem to  
 8 think it is. It's a moment of -- it's a product of the  
 9 circumstances on that day.  
 10 MR CURTIN: Caroline Bolton seems to -- which we'll come to,  
 11 she relies on it.  
 12 MR JUSTICE NICKLIN: I know she does, but I've watched the  
 13 footage. It's a situation that escalates. It escalates  
 14 partly because of the behaviour of the driver and partly  
 15 because of the behaviour of the protestors. The two of  
 16 you -- the two countervailing, are in a sort of  
 17 escalation and that's what ultimately leads to the  
 18 situation that ...  
 19 But in the real world, this was a vehicle being  
 20 obstructed from leaving a site for probably no more than  
 21 five/ten minutes. Now, there's an element of  
 22 proportionality that needs to be taken into account  
 23 here. Yes, of course it was arguably a civil wrong to  
 24 obstruct that vehicle, but I've got to take into account  
 25 all of the circumstances in relation to that.

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1 MR CURTIN: Okay. Well, I'll just ask you, with the  
 2 evidence you have in front of you, if there is no red  
 3 line, if there are no parameters on Mr Curtin, is he  
 4 going to run back on the road and sit in front of the  
 5 cars as his way of expressing? I'd suggest to you  
 6 that's not a likelihood. Number one, because today,  
 7 post-injunction, post everything else, I'd be arrested  
 8 by the police much more quickly than I ever would have  
 9 been in July -- July 21, the police had the most liberal  
 10 readings of obstruction of the highway that I've ever  
 11 come across and, again, with the 40 years' experience,  
 12 I'm like, "Pfff". The other protestors, lots of them  
 13 have never been to a protest before. You can see the  
 14 way they're acting, "This is my right ..." --  
 15 MR JUSTICE NICKLIN: Yes. People seem to have a very firm  
 16 view of what their rights are. They're not always  
 17 correct.  
 18 MR CURTIN: No, but I'm someone who, if I don't have  
 19 restrictions to obstruct the highway -- here is someone  
 20 who hasn't set out to deliberately obstruct the free  
 21 passage. I haven't.  
 22 MR JUSTICE NICKLIN: Yes.  
 23 MR CURTIN: We deal with a number of incidences here and  
 24 it's 8 September, 13 September. All the incidences of  
 25 trespass, they all follow into a pattern, yes, of me

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1 being there --  
 2 MR JUSTICE NICKLIN: Yes. It's broadly speaking the ritual.  
 3 MR CURTIN: Yes.  
 4 Conclusion.  
 5 Obstruction of the highway. So, for me, they're  
 6 quite similar issues.  
 7 MR JUSTICE NICKLIN: Yes, the important difference between  
 8 the first one, what we've just been discussing, which is  
 9 the common law right of access to the highway, that's  
 10 a private right --  
 11 MR CURTIN: Yes.  
 12 MR JUSTICE NICKLIN: -- private law right. What we're  
 13 moving on to now is obstruction of the highway.  
 14 Obstruction of the highway is not a tort. Obstruction  
 15 of the highway is a crime.  
 16 MR CURTIN: Yes.  
 17 MR JUSTICE NICKLIN: An individual person or company cannot  
 18 bring a civil claim over the commission of a criminal  
 19 offence unless the law recognises that also to be  
 20 a tort. The Protection from Harassment Act provides  
 21 both a criminal offence and a civil remedy. The old law  
 22 of public nuisance used to be both a criminal offence  
 23 and a civil remedy or civil claim. Ordinarily, you  
 24 cannot bring a civil claim relying upon a criminal  
 25 offence.

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1 MR CURTIN: Yes.  
 2 MR JUSTICE NICKLIN: The claimants can bring a claim  
 3 complaining about obstruction of the highway if they can  
 4 satisfy the court that the obstruction of the highway  
 5 constituted a public nuisance because a public nuisance,  
 6 providing the claimants can show they've suffered  
 7 a particular loss, is actionable as a civil cause of  
 8 action.  
 9 MR CURTIN: Okay.  
 10 MR JUSTICE NICKLIN: So what the claimants have to show  
 11 against you is that you have caused a public nuisance by  
 12 obstructing the highway.  
 13 MR CURTIN: Yes.  
 14 MR JUSTICE NICKLIN: So in the various incidents they rely  
 15 upon, they have to show that you, Mr Curtin, have been  
 16 involved in a public nuisance of obstruction of the  
 17 highway.  
 18 MR CURTIN: Yes.  
 19 MR JUSTICE NICKLIN: Now, what Anglian Water is a useful  
 20 example of is the fact that not all obstruction of the  
 21 highway is a public nuisance arguably --  
 22 MR CURTIN: Yes.  
 23 MR JUSTICE NICKLIN: -- and you'll have heard the discussion  
 24 we had yesterday about that because, although what you  
 25 were doing was obstructing the Anglian Water vehicle,

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1 the only person to be affected, in the real world, by  
 2 that act of obstruction was that single driver.  
 3 MR CURTIN: Yes.  
 4 MR JUSTICE NICKLIN: Nobody else tried to go into or leave  
 5 the Wyton site at that stage. There was nobody who --  
 6 for example, the 20 ramblers that I'm talking about --  
 7 who were unable to cross because you were obstructing  
 8 the way. None of that happened. The only person who  
 9 was obstructed in reality on that day, on the highway,  
 10 was the Anglian Water driver. That is not a public  
 11 nuisance.  
 12 MR CURTIN: Yes.  
 13 MR JUSTICE NICKLIN: Now, contrast that with the occasions  
 14 where we've got hundreds of protestors all across the  
 15 carriageway, they are entirely blocking the road. That,  
 16 arguably, is a public nuisance because it prevents  
 17 anybody from going down the B1030, whatever it's called,  
 18 1040.  
 19 MR CURTIN: Yes.  
 20 MR JUSTICE NICKLIN: That's public nuisance. So they need  
 21 to show that you were involved in one of those latter  
 22 categories of obstruction of the highway so that it  
 23 qualifies as a public nuisance.  
 24 MR CURTIN: Yes.  
 25 MR JUSTICE NICKLIN: Then they also have to show that public

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1 nuisance caused them a loss -- sorry, a particular  
 2 damage.  
 3 MR CURTIN: Yes, okay. So in terms of public nuisance,  
 4 rather than being a typical protest, Camp Beagle -- I am  
 5 a resident of Camp Beagle. I live at Camp Beagle.  
 6 I want to be part of the community. So I remember  
 7 losing my voice on times when we would have a lot of  
 8 people, "Get off the road, get off the road", not  
 9 because people were deliberately blocking the road --  
 10 people just go on the road and the more people there  
 11 are, "Please get off the road, please get off the road".  
 12 There's no evidence in front of you that Mr Curtin ever  
 13 set out to cause a public nuisance.  
 14 MR JUSTICE NICKLIN: It's not a tort that requires an  
 15 intention.  
 16 MR CURTIN: Okay.  
 17 MR JUSTICE NICKLIN: What the tort requires is you to have  
 18 participated in an obstruction of the highway that  
 19 constitutes a public nuisance, so whether you intend it  
 20 or not wouldn't be material. It might be relevant to  
 21 why you were there.  
 22 MR CURTIN: Okay.  
 23 MR JUSTICE NICKLIN: So there's a difficult balancing  
 24 process to do because obstruction of the highway --  
 25 you've heard us talk about Ziegler -- obstruction of the

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1 highway is a complicated area of the law because it  
 2 tries to hold a balance between everybody's right to use  
 3 the highway and certain people's right to use the  
 4 highway in order to further their protest activities .  
 5 So, for example, if you march down the road in such  
 6 numbers that people couldn't pass their vehicles, that  
 7 would potentially be an obstruction of the highway, but  
 8 the court might say there was a lawful excuse because  
 9 the procession or demonstration was a lawful exercise of  
 10 a protest right and that, in balancing those rights, the  
 11 court would come to the conclusion that the temporary  
 12 obstruction of the road was justified as an interference  
 13 with the rights of others, those people who wanted to  
 14 drive down that road at that particular moment -- that  
 15 it was justified to respect the rights of the protestors  
 16 to march down the road.  
 17 Now, you can see how all of that fits together and  
 18 there's always a balance because the ability to march  
 19 down -- 150/200/300/500 people march down the road with  
 20 their banners, shouting, waving, singing, whatever they  
 21 wanted to do, okay, that's fine, you walk down. It  
 22 might take you 20 minutes to go past the Wyton site  
 23 entrance. For that period it's going to obstruct access  
 24 to the Wyton site, it's going to prevent people driving  
 25 down the B1030, but the law says, "Okay, that's

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1 20 minutes, but protest is an important thing, that's  
 2 a little bit of interruption to people's lives , but the  
 3 protest is more important".  
 4 If you're sat down in the road and refuse to move  
 5 for five hours, then the balance flicks the other way,  
 6 which is, "Okay, you don't have the right to sit in the  
 7 road for five hours because you're extinguishing other  
 8 people's right to use the road for that period", so the  
 9 law is likely to come down and say that that's not  
 10 a lawful use of the highway. You don't have a lawful  
 11 excuse for obstruction of the highway therefore you are  
 12 all guilty of obstruction of the highway. That would  
 13 still leave open the question as to whether or not you'd  
 14 caused a public nuisance.  
 15 MR CURTIN: Okay. So the evidence against me and the  
 16 evidence you've heard from me, I never set out to cause  
 17 a public nuisance. If I ever suspected we were becoming  
 18 literally a public nuisance, I would have done  
 19 everything in my power to stop it. For example,  
 20 a lengthy sit-down on the road would cause -- the road  
 21 got blocked many times, but normally by the police. The  
 22 police took the vast majority of the policing decisions,  
 23 whether it be large numbers or on dog van days they'd  
 24 block the roads off. You're dealing with me, here, as  
 25 a resident of Camp Beagle. There hasn't been organised

1 blockades, I wouldn't tolerate them, I couldn't see the  
 2 need in them, and so you're not dealing with -- here,  
 3 I don't need an injunction to stop me blockading the  
 4 road towards members of the public. I cannot -- no,  
 5 I can't even think of a scenario where that would be --  
 6 to be a public nuisance. Hopefully --  
 7 MR JUSTICE NICKLIN: Well, it's a difficult injunction to  
 8 grant because the injunction would have to be rooted in  
 9 public nuisance so it would have to prohibit you from  
 10 conduct which the court was satisfied would be a public  
 11 nuisance. That's a difficult injunction to grant. And  
 12 the difficulty is that I could grant an injunction along  
 13 the lines of not obstruct any vehicle passing along the  
 14 road from one mile either side of the Wyton site, but  
 15 the trouble with that is that is -- because obstructing  
 16 a vehicle in an isolated incident is not a civil wrong  
 17 and it only becomes a civil wrong if it amounts to  
 18 public nuisance, a single person obstructing a single  
 19 vehicle is not public nuisance --  
 20 MR CURTIN: Yes.  
 21 MR JUSTICE NICKLIN: -- so it's a difficult cause of action  
 22 upon which to base an injunctive remedy looking forward  
 23 because it's difficult to define.  
 24 MR CURTIN: Well, it's a joy for me to say that problem is  
 25 yours.

1 MR JUSTICE NICKLIN: I know. Thank you.  
 2 MR CURTIN: It's me that keeps bringing back to it. As long  
 3 as you can put me back to Anglian Water again and not  
 4 take away the original plan, "Here, look, there's  
 5 a car", and the fact that -- if other people hadn't been  
 6 around, we don't know what would have happened. Whether  
 7 I'd have carried on my bad mood, I doubt it. You know,  
 8 like, "All right, don't take a leaflet". So I do ask --  
 9 leave me that human interaction, but brief -- I don't  
 10 know how you would word it, I don't know what becomes --  
 11 MR JUSTICE NICKLIN: I know. Leave that to me.  
 12 MR CURTIN: To talk about the weather, to --  
 13 MR JUSTICE NICKLIN: The thing that you can rely on,  
 14 Mr Curtin, is that the Anglian Water incident stands out  
 15 as a single incident. If you were adopting protest  
 16 strategies that involved doing this every day, I would  
 17 have more than this as an example. The fact that this  
 18 is the single example shows that it's not happening  
 19 every day.  
 20 MR CURTIN: It's a single example for me, but there were  
 21 other people there who you can pick up on the thing who  
 22 would dearly love to stop every vehicle going in and  
 23 out, probably, and making their stand.  
 24 MR JUSTICE NICKLIN: Well, I'm not dealing with them, I'm  
 25 dealing with you.

1 MR CURTIN: Proportionality. I wrote that in big letters.  
 2 I think this is all about proportionality in my case.  
 3 MR JUSTICE NICKLIN: Oh, yes. The most difficult aspect of  
 4 this case is finding a proportionate remedy.  
 5 MR CURTIN: I think this is -- I've written in big  
 6 letters -- I think this is harassment.  
 7 MR JUSTICE NICKLIN: Are you on to harassment now?  
 8 MR CURTIN: I've got in big letters, "I haven't surrounded  
 9 a car. Mr Curtin can't surround a car. Maybe Mr Curtin  
 10 has stood in front of cars, has shouted with  
 11 a loudhailer", but Caroline Bolton -- the worst-case  
 12 scenario is not now what they shout, it's people  
 13 shouting, "Have a heart, have a heart", but surrounding  
 14 their vehicle. I can't surround the vehicle and I never  
 15 did surround the vehicle. There's no evidence of me  
 16 ever going round the back and doing a joint enterprise.  
 17 So that's what I've got there. I haven't surrounded  
 18 a vehicle.  
 19 Is the level of harassment necessary to aggravate  
 20 the other cases? Has it got to be of a criminal  
 21 standard?  
 22 MR JUSTICE NICKLIN: The authorities suggest that in order  
 23 to sustain liability for a civil action in harassment,  
 24 the behaviour complained of must be of such a degree  
 25 that it could amount to a criminal offence.



1 MR CURTIN: Okay.  
 2 MR JUSTICE NICKLIN: So it's a level of seriousness of the  
 3 activity which the court should have regard to when  
 4 deciding whether the line has been crossed by being  
 5 irritating , you know, causing some degree of upset.  
 6 It's got to cross a line --  
 7 MR CURTIN: Yes.  
 8 MR JUSTICE NICKLIN: -- and the line is recognised by what  
 9 the authorities refer to as -- the easiest thing is that  
 10 it's got to be oppressive.  
 11 MR CURTIN: Yes.  
 12 MR JUSTICE NICKLIN: Let me just find the relevant ...  
 13 So the law is:  
 14 "It is a persistent and deliberate course of  
 15 unacceptable and oppressive conduct targeted at another  
 16 person which is calculated to and does cause that person  
 17 fear or distress ... A persistent and deliberate course  
 18 of targeted precision [as read]."  
 19 MR CURTIN: Okay.  
 20 MR JUSTICE NICKLIN: Then:  
 21 "The behaviour said to amount to harassment must  
 22 reach a level of seriousness passing beyond irritations ,  
 23 annoyances, even a measure of upset that arise  
 24 occasionally in everybody's day-to-day dealings with  
 25 other people. The conduct must cross the boundary

1 between what is unattractive, even unreasonable, and  
 2 conduct which is oppressive and unacceptable. To cross  
 3 the border from regrettable to the objectionable, the  
 4 gravity of the misconduct must be of an order which  
 5 would sustain criminal liability [as read]."  
 6 MR CURTIN: Okay. So I have a couple of things to say  
 7 there. Normally in the criminal sense, if I can talk  
 8 about that for a minute, I have some confusion. It's  
 9 got to be about the person. There wouldn't be such  
 10 a thing as I've harassed the workers. In a criminal  
 11 sense, if I've harassed an individual -- it talks about  
 12 individual in this.  
 13 MR JUSTICE NICKLIN: Well, there's a slight wrinkle on that  
 14 because it does say "targeted", but the law has made  
 15 clear that targeting -- let me just find it.  
 16 MR CURTIN: Well, I target the workers -- as used in my own  
 17 defence, yes, if they're going in the site, not just  
 18 workers -- yes, target the workers, but I've never  
 19 targeted them individually, so ...  
 20 MR JUSTICE NICKLIN: Well, what the law has said is:  
 21 "Those who are targeted by the alleged harassment  
 22 can include others who are foreseeably and directly  
 23 harmed by the course of targeted conduct of which the  
 24 complaint is made to the extent they can be properly  
 25 described as victims of it [as read]."

1 So it's not necessarily a defence for you to say  
 2 that you didn't pick out any individual workers. What  
 3 will be argued and is argued against you is that what  
 4 you were doing by targeting all of the workers, you must  
 5 have realised that your acts would have had an impact on  
 6 the individuals . So it's rather like -- the scenario  
 7 would be different if you decided to, I don't know, get  
 8 up each morning and march down Hitchin High Street with  
 9 a loudhailer at 6.00 am and say, "Shut down MBR Acres.  
 10 They're an absolute disgrace".  
 11 MR CURTIN: Hmm.  
 12 MR JUSTICE NICKLIN: If there happened to be somebody who  
 13 had a flat over one of the shops who was woken up every  
 14 morning, he or she couldn't really say that you were  
 15 targeting them with harassment because, objectively  
 16 judged, your marching down Hitchin High Street is not  
 17 targeting that person in any meaningful sense. The fact  
 18 that they're having their sleep interrupted isn't  
 19 actually targeted harassment.  
 20 Your situation is different . You can be said and it  
 21 is said that you are channeling your activities and they  
 22 are directed at all of the employees, so as a group of  
 23 people, they are targeted, even if you don't intend to  
 24 single out any particular individual .  
 25 MR CURTIN: Yes, it just strikes me as -- the course of

1 conduct makes sense in the individual because you can be  
 2 unpleasant to them once, but it's when it's twice and  
 3 three times. But with this group claimant, to be  
 4 unpleasant to A and then the next day to B and somehow  
 5 aggravate --  
 6 MR JUSTICE NICKLIN: Well, the point is -- perhaps for your  
 7 purposes, the point is more that no individual worker  
 8 can objectively regard you as personally targeting any  
 9 of them. Your case is that all of the workers  
 10 understood that they weren't being targeted because they  
 11 were Mr Jones, Mr Smith, whoever. They were having the  
 12 protest message delivered at them because of where they  
 13 worked and they knew that.  
 14 MR CURTIN: Yes, it took some doing. They didn't know that  
 15 to begin with. In their witness statements it came  
 16 across as, no, they all felt targeted.  
 17 MR JUSTICE NICKLIN: Well, in a broad sense they do feel  
 18 targeted, but you've managed to explore with them that  
 19 they recognise they're not being targeted as me, the  
 20 person. It's not the singling out, "You, the person in  
 21 the back passenger seat of the third car, you are the  
 22 person that we think ...".  
 23 MR CURTIN: Yes.  
 24 MR JUSTICE NICKLIN: It's not that. It's, "You all, we hold  
 25 you all responsible because you work in this facility".

1 That's the broad protest message.  
 2 MR CURTIN: So this aggravating aspect of harassment, it  
 3 would be my submission here that it would never go --  
 4 I would not be in trouble in a Criminal Court.  
 5 I wouldn't be prosecuted under a criminal -- the  
 6 evidence in front of you would not allow --- and I think  
 7 the jury would probably be directed -- to carry out  
 8 a conviction against me for harassment against any  
 9 individual, for sure.  
 10 MR JUSTICE NICKLIN: Yes.  
 11 MR CURTIN: That's my case.  
 12 MR JUSTICE NICKLIN: Well, and for what it's worth -- I'd  
 13 need to just check -- but I don't think anybody has been  
 14 prosecuted for harassment.  
 15 MR CURTIN: No, I don't think so.  
 16 MR JUSTICE NICKLIN: Oh, no, there's ... some people have  
 17 been.  
 18 Right. Okay.  
 19 MR CURTIN: Okay, I've just got a couple of pages here  
 20 before we have our break. 171, the first point deals  
 21 with V. The second point, I do want to address it  
 22 because it --  
 23 MR JUSTICE NICKLIN: Where are you now?  
 24 MR CURTIN: Sorry. 171, point (ii). It does appear as  
 25 a stand-alone comment and I am -- I have come here to

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1 try and -- I've had two years of attacks on me  
 2 personally via internet and I -- part of the reason  
 3 I've come here is to defend myself and this comment  
 4 here -- and I did say, under cross-examination, I feel  
 5 for any lone woman in a vehicle having men aggressively  
 6 shout through the window with a megaphone and, with  
 7 a megaphone, might be made to feel vulnerable. I did  
 8 say that, and I'm being cross-examined about a situation  
 9 in broad daylight where there's police officers, there's  
 10 lots of protestors -- I wasn't dealing with a scenario  
 11 of me surrounding a lone woman. On a stand-alone  
 12 comment, it's like "Pffff". At least -- I'm accepting  
 13 it, but there is no allegation to go along with that of  
 14 a lone female.  
 15 Mr Hardy, again -- the next section, I do want to  
 16 run through some of the transcripts and it's just  
 17 something they've said.  
 18 That's the final -- the additional incident of the  
 19 cameras as a form of harassment, there is evidence of me  
 20 putting up a camera. It's not -- the camera I was  
 21 putting up wasn't the big surveillance system that was  
 22 talked about and discussed. What I took responsibility  
 23 for there was a little camera that I was putting  
 24 alongside the security cameras. They didn't work anyway  
 25 and there's evidence of me trying to put another camera

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1 up. The reason why I put cameras up is not to cause  
 2 harassment of workers. Simple as that. Simple as that.  
 3 I'm sure if I wanted to do that -- well, I know how  
 4 to do it. Every single where they go, "Oh, look,  
 5 I've got intel on them, I've got your face, I've got  
 6 your ..." -- make it obvious. I don't want to harass  
 7 anyone.  
 8 When I'm looking to capture footage of the people  
 9 loading the dogs, I'm after the animal bits. I'm not  
 10 after their face. I've got no interest in their face --  
 11 literally I've got no interest. So I personally don't  
 12 take images in order to harass. I take it to  
 13 investigate animal cruelty. That's all.  
 14 Yes, that's it. That's done for this. Then we've  
 15 got one more section where I just want to go through  
 16 some of the transcripts.  
 17 MR JUSTICE NICKLIN: Okay. Shall we have a break?  
 18 MR CURTIN: Yes.  
 19 MR JUSTICE NICKLIN: Okay, let's come back at 3.20.  
 20 (3.05 pm)  
 21 (A short break)  
 22 (3.21 pm)  
 23 MR JUSTICE NICKLIN: Right, Mr Curtin.  
 24 MR CURTIN: Yes, I may go to whizz through some of my notes  
 25 on the actual evidence that was given.

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1 Okay, Susan Pressick. I've dealt with the fact  
 2 that I -- I'm still confused today who did represent the  
 3 first claimant. Was it Susan Pressick? Was it Markou?  
 4 I'm left with the mystery. You can tell me that it was  
 5 dealt with adequately in the paperwork. Mr Markou,  
 6 I think it was dealt with flippantly. There should have  
 7 been -- I don't feel like I've had MBR Acres on my  
 8 case -- MBR Acres at the helm. No, no. Susan Pressick  
 9 and other people were steering this injunction.  
 10 In relation to how she felt about people shouting,  
 11 she -- because I would submit she's not one of the  
 12 MBR -- I put it as simply as this: she's not really one  
 13 of the MBR workforce. She goes to the site occasionally  
 14 and she did take it collectively.  
 15 "Question: Have you been shouted at?  
 16 "Answer: Yes, I get targeted as a group. I don't  
 17 get targeted as the licence holder [as read]."  
 18 She seemed to have an understanding.  
 19 When I began -- she was the first person -- when  
 20 I began to ask Ms Presswick -- I think I asked her the  
 21 question, "Are you a puppy killer?", Caroline Bolton  
 22 stood up and she began to object. She said, "My Lord,  
 23 unless Mr Curtin is putting to Mrs Pressick that she  
 24 kills dogs [as read]", but it was a perfect beginning  
 25 to -- she was the project licence holder and she was

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1 aware and, for me, I'm glad I went down that route. It  
 2 was an interesting one and I think even then  
 3 Caroline Bolton seemed to want to sort of stop me going  
 4 there. Anyway, I've made an irrelevant point.  
 5 Susan Pressick said, "As I described, it's all of  
 6 us", but she said, "It's still difficult". That's that  
 7 boundary. We're difficult, unacceptable. Yes, you  
 8 know, like I said, we are the neighbours from -- as far  
 9 as them, we're very -- MBR can't want us there. We're  
 10 a blot on their landscape.  
 11 I've dealt with her submission on the effect that  
 12 the drones had on site. I suggest to you it's much  
 13 better to take some of the actual workers, particularly  
 14 Mr Hardy. You seem -- hopefully you're on board with  
 15 there has been no evidence presented against me.  
 16 Mrs Pressick, on behalf of B&K -- she was the only  
 17 one here -- she actually said, point 89/110, "There's  
 18 a poster about a demo [as read]". That's it, that's the  
 19 entire case, and on the basis of that you should grant  
 20 a full High Court injunction? No, no, no, there's  
 21 a poster about a demo at Bantin & Kingman. There wasn't  
 22 one scrap of evidence presented against Bantin &  
 23 Kingman.  
 24 Wendy Jarrett, before this trial begun, I was under  
 25 a considerable amount of stress about the case and she

1 was perhaps -- legally she had the least to worry,  
 2 Wendy Jarrett, but it's someone that I wanted to engage  
 3 properly and I'm disappointed with how it went. But  
 4 I would ask you that we did gather she's not an expert  
 5 witness. I put it to her that she's a lobbyist; she  
 6 puts she's an advocate. She's told you that she's paid  
 7 2.26 of their income. I looked it up, her income, and  
 8 it's not evidence, but it was something like 100,000 or  
 9 200,000, and it's like £15,000 she pays to Marshalls  
 10 [sic] and that must be taken into account, that she  
 11 wasn't called as an expert witness but she talked like  
 12 one.  
 13 I've outlined Helsinki here.  
 14 MR JUSTICE NICKLIN: I don't think you need to worry about  
 15 Ms Jarrett's evidence because I'm not sure Ms Bolton has  
 16 relied on it.  
 17 MR CURTIN: Okay. If I may say this -- I'm aware of the  
 18 time -- it's just to understand the sort of bottleneck  
 19 of where we are with this -- with the campaign, which  
 20 this company is kind of on the receiving end. They've  
 21 got a camp outside their premises. But beneath that  
 22 there is a world of controversy. Wendy Jarrett, she  
 23 gave, I would suggest, the view of the industry, but  
 24 even within the industry, as she came to the end of her  
 25 evidence, there's a clamour for change. We had to talk

1 about -- the reason I've got Helsinki -- the  
 2 Helsinki 1964 with Susan Pressick, who is the project  
 3 licence holder. I was expecting -- well, I wasn't  
 4 surprised -- when I asked her, "Which law? Take me to  
 5 the law", she didn't know about the law that required  
 6 this. She took me to ASPA and that's not the law that  
 7 covers this.  
 8 Wendy Jarrett had a bit more of an insight -- it's  
 9 actually international regulations that are run by the  
 10 ICH and Reach(?) and -- it's very -- it's actually --  
 11 it's a daunting task to get this kind of regulatory  
 12 experiments shut down and, in this country anyway, it's  
 13 MBR Acres that are kind of bearing the brunt of all that  
 14 pressure. Even from the industry, there's this clamour  
 15 for change, that this thing needs looking at. Oh my  
 16 God, that's the -- even Wendy Jarrett welcomed the end  
 17 of animal experiments.  
 18 So there's this -- oh, I can't explain it, what I'm  
 19 talking about -- all this background work and it's all  
 20 bottlenecked -- not all of it, but a lot of it produces  
 21 this amount of tension that we've got, that you can hear  
 22 in people's voices. There's this clamour for something  
 23 to be done.  
 24 I talked about my phone having more capacity than  
 25 the NASA Space Station, yet this Helsinki agreement and

1 the regulatory procedures, they have not had the  
 2 scrutiny basically that they deserve. So I want to  
 3 justify -- not justify, but to give some picture of the  
 4 massive body of evidence within the industry actually,  
 5 even they're not happy. But we're coming up against  
 6 a brick wall. The Home Office is the last brick wall  
 7 left and -- anyway, I just wanted to offer that as some  
 8 sort of background. Susan Pressick wasn't aware of the  
 9 law, she wasn't aware of the Helsinki Act and she should  
 10 be as project licence holder.  
 11 I talked to Wendy Jarrett and I'm not going to go on  
 12 about -- she talked about the great science. I said,  
 13 "Well, chocolate would fail your toxicity ...". If  
 14 I may spend one minute on -- I think you've picked up on  
 15 it and I just want to say this is not necessarily  
 16 evidence, but we're human beings. I'm allowed to spend  
 17 at least one minute -- because I think this has been as  
 18 cold as ice in this room. It's been like it's a potato  
 19 factory. We haven't heard the sounds of the dogs, the  
 20 heartbreak. We haven't seen the horrible images.  
 21 What was I going to say?  
 22 MR JUSTICE NICKLIN: But, Mr Curtin, you know why that is --  
 23 MR CURTIN: Yes.  
 24 MR JUSTICE NICKLIN: -- and that's because you don't need to  
 25 push at an open door so far as the law is concerned.

1 You don't need to demonstrate to the court that there is  
 2 something you feel strongly about and need to protest  
 3 about or that there are grounds for concern. The law  
 4 makes all of those assumptions in your favour --  
 5 MR CURTIN: Okay.  
 6 MR JUSTICE NICKLIN: -- and the claimants aren't challenging  
 7 that you have these firmly held beliefs as the basis of  
 8 your protest. So you don't need to persuade me that  
 9 you're right to protest. You have that right. The law  
 10 protects your right to protest.  
 11 MR CURTIN: Okay, but maybe the log jam, the bottleneck, is  
 12 that Wendy Jarrett, in her statement, said that no one  
 13 wants animal testing, and I made the point that maybe  
 14 there are some people, they have a vested interest --  
 15 MR JUSTICE NICKLIN: Yes, I've no doubt that these are very  
 16 important issues, but I don't have the -- I, as a judge,  
 17 don't have any ability to resolve those.  
 18 MR CURTIN: Yes.  
 19 MR JUSTICE NICKLIN: These are broad political issues.  
 20 These are why you are campaigning. That campaign  
 21 ultimately has to get to the ears of those who make the  
 22 laws. I don't make the laws. I enforce them.  
 23 MR CURTIN: Wendy Jarrett, the last thing I'll say about her  
 24 is that she even said, "We don't need protests. It's  
 25 that far ahead, this move within the industry", and

1 I took issue to that. Yes, it's not -- we still do  
 2 need -- we still need -- I said to her, "So Camp Beagle  
 3 can go home, Daily Mirror can go home?". No, I'm  
 4 defending the right to protest.  
 5 Right, let's get on to some nitty-gritty.  
 6 Mr Manning. It goes some way to the -- it goes back  
 7 to the -- we've dealt with this case -- like you said,  
 8 you've explained to me why -- as if it's a potato  
 9 factory, which we've kind of had to. But here's another  
 10 strand -- so many strands to it. Mr Manning, now head  
 11 of security, at the time senior security guard, even he  
 12 was told -- he was instructed by his company not to --  
 13 "Question: You've been told by the company not to  
 14 engage with protestors?  
 15 "Answer: That's correct [as read]."  
 16 How can I say? All the stuff you've seen for  
 17 yourself with your own eyes that -- you've seen the  
 18 bills for security, you've seen the amount of security  
 19 on that side of the fence. Today you heard about the  
 20 guard dog teams, as if they're somehow connected to the  
 21 policing of the gate. There may be one picture of the  
 22 new guard dog teams. Those guard dog teams are to stop  
 23 night-time -- night-time or day-time major incursions,  
 24 to stop people getting the dogs.  
 25 But you could see that the -- and the claimant

1 should take some responsibility for taking no part at  
 2 all, for sitting back, and, for example, all the massive  
 3 load of security guards -- by the time they get to  
 4 August, there's 10/15 security guards, just watching the  
 5 police, two officers sort of kind of struggling, but  
 6 struggling well, professionally. I remember these two  
 7 local police officers used to turn up.  
 8 So here you've got the head of security, but  
 9 that's -- this is an odd case. It's odd in terms of  
 10 like the world of animal experiments is -- it's an  
 11 uncomfortable truth and, as a result of that, there's  
 12 this secrecy and that secrecy, and not wanting to openly  
 13 discuss things goes right down to even -- I think it's  
 14 really strange that the head of security is given  
 15 instructions not to interact with the demonstrators.  
 16 So the second claimant needs to take some  
 17 responsibility for that period, of taking no part to  
 18 protect their own workers as they were coming in and  
 19 out, none.  
 20 MR JUSTICE NICKLIN: I think, Mr Curtin, that reflects  
 21 a real concern that, if privately contracted security  
 22 individuals got themselves involved with the protestors  
 23 at the gate or, worse, on public land, then they can be  
 24 in all sorts of potential difficulties. It would in all  
 25 probability seriously have inflamed the situation. If

1 any of those security guards had laid a hand on any of  
 2 the protestors, on the basis of what I know, I would not  
 3 have difficulty inferring that that would escalate  
 4 matters significantly --  
 5 MR CURTIN: Yes, okay.  
 6 MR JUSTICE NICKLIN: -- in that August period.  
 7 MR CURTIN: Okay. My point was really adding to the -- just  
 8 to give a picture of the level of friction, the level of  
 9 non-co-operation, the level of -- not animosity. Two  
 10 worlds are operating and there is no -- what you might  
 11 expect -- there is no dialogue. This is the only  
 12 dialogue we've ever had with this company in any way,  
 13 shape or form. I'm not aware of the people -- whoever  
 14 are behind this, Scott Marshall -- of any dialogue at  
 15 all.  
 16 MR JUSTICE NICKLIN: I mean, it's a minor point but you are  
 17 entitled to point to the fact that -- or it's a point  
 18 you can make that, at that time when the banners were  
 19 across the gateway and the cages were strewn across the  
 20 entryway, that there was no request that these be moved.  
 21 MR CURTIN: No. Yes, exactly. Thank you.  
 22 Mr Manning. He began -- I took him to his  
 23 statement:  
 24 "I'm worried how far he will go [as read]."  
 25 Now, it's paragraph 49, line 55, but -- I don't know

1 if you ever want to take my quotations, but they —  
 2 MR JUSTICE NICKLIN: You can do. That's fine.  
 3 MR CURTIN: But I think with the 49, you have to — I've  
 4 taken the bottom of the page always as the top of the  
 5 page. Whenever I give you a reference — well, for  
 6 example, I go to this one, 49/55, Mr Manning — I think  
 7 it's going to be 50/55 —  
 8 MR JUSTICE NICKLIN: Well, just read it out.  
 9 MR CURTIN: Ah, "I'm worried how far he will go", and he  
 10 says he's done his research. I asked him then, "Very,  
 11 very limited". So paragraph 49 — or paragraph 55/3 —  
 12 I reckon it will be 56/3. You'll go to it. 56/3,  
 13 Mr Manning.  
 14 MR JUSTICE NICKLIN: I'm just reminding myself of  
 15 Mr Manning's evidence. He's provided — his third  
 16 witness statement, he does say, paragraph 36:  
 17 "When we needed to remove the banner from the access  
 18 road, if there were protestors nearby, I would ask them  
 19 to remove it to give way to vehicles about to enter or  
 20 exit the Wyton site. On some occasions the protestors  
 21 removed the banner or flags themselves. If I removed  
 22 the banner myself without interacting with the  
 23 protestors, the protestors would sometimes become angry  
 24 at me, for example shouting that the banner was their  
 25 property and that I had no right to remove it.

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1 Therefore, so I did not receive an angry reaction,  
 2 I would often start by asking the protestors to remove  
 3 the banner. However, if the protestors refused to  
 4 remove the banner or did not engage with me or if there  
 5 were no protestors there, I or another member of the  
 6 security staff would move the banner myself [as read]."  
 7 MR CURTIN: Yes.  
 8 MR JUSTICE NICKLIN: So, okay, that was evidence that came  
 9 after he'd given evidence —  
 10 MR CURTIN: Yes, and I wasn't able to cross— — and it  
 11 wasn't — yes, if we ever got that amount of  
 12 conversation between me and him, it would have been a —  
 13 I don't remember it — "Could you remove the banner?";  
 14 "I was going to remove it anyway". That's the height of  
 15 any communication between us and this company.  
 16 MR JUSTICE NICKLIN: Mr Manning makes the point, which is  
 17 what I was referring to a moment ago, which is he says:  
 18 "We approached each situation on a day-to-day basis  
 19 with the aim of avoiding conflict and enabling the staff  
 20 to access or exit the staff as quickly as possible [as  
 21 read]."  
 22 MR CURTIN: Yes. I suppose it's my case that, yes,  
 23 Mr Manning was aware — well, in fact, if we go to —  
 24 can we see if our system is working, on 55/3, have you  
 25 got me asking about research?

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1 MR JUSTICE NICKLIN: Hang on a minute. I'll have to go  
 2 into — I don't have the transcripts immediately to  
 3 hand.  
 4 MR CURTIN: Oh, the Opus. Again, Mr Manning which was  
 5 Day 4. I've just got 55/3 but it might be 56/3 you  
 6 might like to go to. "I'm worried about how far ..." —  
 7 there you go. So you found it, 55/3. So this is an  
 8 important section that I want to move on to really and  
 9 it goes to the heart of the case against me. In fact  
 10 with Witness V, by the time — he was my last witness.  
 11 With the other witnesses I went through chronologically,  
 12 but for this point, by the time I get to the last  
 13 witness, it's quite clear that I'm — by then I'm  
 14 dealing with a pattern of behaviour amongst the workers  
 15 and I went straight to it with V. But this is a section  
 16 where I get to it with Mr Manning. When he says:  
 17 "I am worried about how far it will go.  
 18 "Question: So you've done some research?  
 19 "Answer: Very, very limited [as read]."  
 20 I asked him:  
 21 "Have you heard of a site called 'Connie Jurtin'?  
 22 "Answer: Yes [as read]."  
 23 I was expecting him to say, "Well, maybe"  
 24 or "No, I can't remember", and he say "Yes".  
 25 I was surprised and off we went. Then I put to

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1 him all the horrible — as I've told you, this  
 2 is a troll site dedicated to me where they say  
 3 horrible — which I don't want to go into now.  
 4 There's a journalist sitting there so I'd only feed  
 5 the journalist. He might ask me afterwards what were  
 6 those horrible things, I don't want to go into them,  
 7 they're gross. But it transpires that out of nearly  
 8 every single MBR witness, I think they'd built a bit  
 9 of — a team building, very much us versus them. They  
 10 had lapped up these allegations against me that were —  
 11 I was going to say "spurious". I don't even know what  
 12 "spurious" means. They were disgusting, horrible,  
 13 painful, hurtful.  
 14 MR JUSTICE NICKLIN: Your suggestion, which you've made to  
 15 the witnesses, is that largely their impression of you  
 16 has been formed by what they believe they know about you  
 17 rather than what you've actually done.  
 18 MR CURTIN: Than what I was doing —  
 19 MR JUSTICE NICKLIN: Yes. I mean what you were doing  
 20 outside the gates.  
 21 MR CURTIN: Yes. They think they know me from — they're  
 22 familiar with me from ... and they all had different  
 23 versions of it. Employee V talked about his intel, but  
 24 once I started to dig it out — and they're all a bit  
 25 obstructive but I bore it from everyone — and some said

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1 they haven't -- I think -- some deny even ever  
 2 discussing me, despite the fact that they've seen these  
 3 sites .  
 4 One of the witnesses said that she was working at  
 5 the Wyton site when I broke in originally and liberated  
 6 the dogs and she didn't share that with her colleagues.  
 7 So it's my case -- and I brought it out -- that by  
 8 looking at troll hatred sites of me, looking at Google  
 9 searches on me, then discussing them, many witnesses  
 10 have discussed -- as I put to -- I think the first  
 11 question I put to V:  
 12 "Has my reputation gone before me?  
 13 "Answer: Yes.  
 14 "Question: Were you intimidated by just my mere  
 15 presence?  
 16 "Answer: Yes, I was, based on ... [as read]."  
 17 And it just -- I hadn't got a chance with those  
 18 people. They're unable to give a fair representation of  
 19 me -- they're able to give a fair representation based  
 20 on what they've heard, but it's so coloured, so -- not  
 21 unfair, so prejudiced, so biased. So it makes sense --  
 22 it finally made sense, when I read about the terror --  
 23 how many times have I read in this statement,  
 24 "John Curtin particularly intimidates me". But when you  
 25 go to the evidence against me, the actual incidents --

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1 9 August, where I was waving a flag. Let me talk about  
 2 that flag, for example. I asked the witness, "Why have  
 3 you put this in your statement?".  
 4 For the witness who mentioned about the car, which  
 5 I'll come to, I said, "Were you prompted?". The answer  
 6 was "Yes". How -- they couldn't have known my car was  
 7 there from outside because there was a load of cages,  
 8 but, "Were you prompted?". If you look at the  
 9 incidences that each witness that's against me talks  
 10 about, none of them -- maybe -- none of my conduct ever  
 11 gave a justifiable conclusion that, "Here is  
 12 a terrifying person. Here is someone really, really  
 13 frightening".  
 14 Again, because there's a journalist there, he's  
 15 like, "Hmm, I wonder what they're saying" -- he might  
 16 squeeze it out of me. I'll just say it. There's one  
 17 incident, grave digging. It's something -- I talked  
 18 about a "Curtin factor". It's like: what? What did you  
 19 say? Even the mere allegation of that -- and I know  
 20 there has been some talk in there of an arrest that  
 21 I was arrested for, an act of grave digging, and if  
 22 they'd have looked into it a bit more -- but that maybe  
 23 didn't suit them -- how I absolutely bitterly condemned  
 24 it. Not only was I not charged, I publicly was  
 25 disgusted by it.

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1 So that's just one of the things they said about me  
 2 and I'm finished as far as them. I can't approach those  
 3 people. I'm a scumbag, I'm a revolting -- I'm  
 4 disgusting basically. So I can kind of see where they  
 5 got some of their fear from, but it's left me in  
 6 a nearly impossible position.  
 7 But when Mr Manning -- "Are you worried Mr Curtin  
 8 may verbally abuse you or pose a physical danger? [as  
 9 read]", he said "No".  
 10 Right. Mr Hardy, again when I started to ask him  
 11 about the bleeding:  
 12 "Are you aware of the bleeding?  
 13 "Answer: I'm aware it happens [as read]."  
 14 I think there was only one witness who came straight  
 15 out with it. It was a fairly easy process.  
 16 "Are you aware of the terminal bleeding procedure?"  
 17 I'd start asking, "Are you a puppy killer?", "No".  
 18 But I understand why anyone is going to say the answer  
 19 "No". But there was only one witness who said --  
 20 "Are you aware of the terminal bleeding procedure?";  
 21 "Yes".  
 22 Mr Markou:  
 23 "We don't kill puppies."  
 24 I said:  
 25 "Who do you kill in the terminal -- who do you kill

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1 then, cats?"  
 2 And he said:  
 3 "Dogs [as read]."  
 4 I was like [sigh]. But one witness -- and I'll come  
 5 to it in here -- one witness, which is crucial and  
 6 I must come to it -- because we had a lot of  
 7 confusing -- and to be honest -- and I think -- sorry,  
 8 to not insult you -- but Caroline Bolton sometimes  
 9 seemed to want to really keep a public relations spin  
 10 on what was going on here and maybe you -- I think you  
 11 interfered and said "You could have misled the court"  
 12 because one witness quite clearly said to you -- "Is it  
 13 the case ..." -- because we talked of this word  
 14 "euthanasia", not "killing". In the laboratories they  
 15 talk about "killing" but at MBR there's only  
 16 "euthanasia".  
 17 You put it to the witness -- and I'll find it, who  
 18 it was, as I go through my little notes:  
 19 "Is it the case that healthy dogs are used in the  
 20 terminal bleeding procedure?"  
 21 And the answer was "Yes", a clear "Yes". And it's  
 22 my case that -- well, you know what my case is, that  
 23 Marshalls, they sell blood, and why has there been so  
 24 much kind of embarrassment and slithery behaviour,  
 25 I think, and sort of -- it goes with 100 years of trying

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1 to cover everything else up. Anyway, I go off.  
 2 Mr Hardy, despite -- he was one of the people --  
 3 Mr Hardy and Mr Markou were people that I couldn't bring  
 4 their level down of fear, I think Mr Markou  
 5 particularly. When he actually gave me the answer --  
 6 I said, "Are you telling me your level of fear ..." --  
 7 I can't remember whether I said of "me outside your  
 8 house" or "four people outside your house at 10 o'clock  
 9 at night" because I'm trying to make the point to the  
 10 witnesses, like, "Surely your worst fear is of getting  
 11 attacked in your home and you're not -- there's no  
 12 allegations that I've got anything to do with that".  
 13 That's where I thought I was going, but then -- so I'm,  
 14 like, "fear of getting attacked in your house. So me  
 15 outside your house at 10 o'clock at night is really bad,  
 16 isn't it? It's much worse than me being in broad  
 17 daylight?". But Mr Hardy and Mr Markou, I couldn't  
 18 bring them down from their -- me outside the house, me  
 19 and a gang of people outside their house at 10 o'clock,  
 20 shouting, screaming, would have the same level of fear  
 21 than in broad daylight, and that brings me to sort of --  
 22 not to -- yes, to question their -- that person of  
 23 reasonable firmness.  
 24 I thought that's a really strong -- there's a lot of  
 25 strong fear of the Camp Beagle protestors and to put

1 that level of fear in, I had to say, "What? Pardon?"  
 2 I was surprised at that, that there's a -- but I never  
 3 took away their sense of fear. I didn't belittle it or  
 4 ridicule it. Just like, "Really? Honestly?". So that  
 5 comes into that sort of test of reasonable -- test of  
 6 firmness.  
 7 Mr Hardy, "I feel like I have the right to privacy  
 8 wherever I am [as read]". I disputed that. He there  
 9 talks about:  
 10 "There was a period and a time when I stopped using  
 11 the trolleys ... [as read]."  
 12 Right, the Production Manager. Again, I could -- of  
 13 all the witnesses, she's the one that -- again, she was  
 14 aware of a large amount of gossip about me, but she had  
 15 a generic fear. She talked about throughout her  
 16 40 years because what I discovered in this case is that  
 17 MBR obviously has a lot of workers who they are able to  
 18 hang on to. There's 40 years and 30 years. I would  
 19 say -- and it would be one of my -- within that team of  
 20 long-term workers, they have built a culture up that  
 21 there is a -- understandably, you could say, the gang  
 22 mentality that was expressed in the statements time and  
 23 time and time again. Even when Mr Pedley(?) wrote the  
 24 statement about putting the statements together, I think  
 25 he said that a certain ring -- a certain turn of phrase

1 kept coming up, and there is a joint sort of MBR worker  
 2 mentality, "We're not doing anything wrong and they're  
 3 wrong".  
 4 She talked about -- the Production Manager, she  
 5 talked about 40 years, in which case there's always been  
 6 an issue of security or there had always been an issue  
 7 of -- "I haven't got it here, maybe, but when you're  
 8 asked 'Where do you work?', you say 'Kennel assistant'.  
 9 You don't say, 'I work for MBR Acres and we do this  
 10 really ground-breaking research [as read]'", because  
 11 it's been attempted to say that before Camp Beagle --  
 12 Camp Beagle has made the company have to react. They  
 13 were already reacting to some form of low-level sort of  
 14 security issues by working in the industry. It's  
 15 controversial.  
 16 Right. Ah, I've got Production Manager. "Are you  
 17 a puppy killer?", I've got "Yes" written here. I don't  
 18 know whether it's true. I've got 41/1, so that will be  
 19 maybe 42 or 41/1, "Are you a puppy killer?", and I've  
 20 got "Yes".  
 21 She talks about -- she remembered the SHAC days.  
 22 She said:  
 23 "I haven't been targeted. It's more of a generic  
 24 attack [as read]."  
 25 I think there was a point where I'm in front of the

1 car and she's there and she accepts I stood there -- her  
 2 words -- I stood there for a brief moment in time. It's  
 3 an every day occurrence.  
 4 Good. Right. Witness AF. She's the person --  
 5 she'd never met me so I don't know why -- there was no  
 6 statements in that about me. I don't know why my  
 7 evidence was in the bundle, but it's the level of fear  
 8 again, that she's someone that -- she applied to get  
 9 a job at MBR, she already -- she goes to the Camp Beagle  
 10 website and she can't see anything about the good work  
 11 we do, the petitions. She only sees -- her mind goes  
 12 into the negativity of our campaign and she's already  
 13 got fear. She does a trial run to see what it's going  
 14 to be like and, by seeing demonstrators in the daylight  
 15 and on the side of the road, she's still filled with  
 16 a level of fear.  
 17 Now, I never took that fear away, but, again, it's  
 18 that reasonable firmness. She suffered from anxiety  
 19 before MBR but I don't want to -- it's that level of  
 20 firmness of, like, "Come on. Deal with it, people.  
 21 This is controversial. You're going to get protested  
 22 at. You have to deal with that. You have to sniff the  
 23 coffee".  
 24 Mr Markou, I've got here, "Don't kill puppies, kill  
 25 dogs". I found Mr Markou unbelievably -- I called him

1 "obstructive". I don't want to insult him, but I found  
 2 him a very, very unforthcoming witness. He didn't want  
 3 us to be camping. Connie Jurtin, I asked him:  
 4 "Are you a tightknit group?  
 5 "Answer: We have spoken about John Curtin. We have  
 6 spoken ... [as read]"  
 7 But then, 84/4:  
 8 "I have not spoken about him. I've never  
 9 spoken about him [as read]."  
 10 He's the one -- I was going to say "bogeyman" --  
 11 I was about to ask him about the bogeyman phenomenon and  
 12 he came up with the word Freddy Krueger. And that's  
 13 what I've become to these people, that level of -- I've  
 14 descended that low because of the things they've been  
 15 reading.  
 16 Employee A, "I can understand it, why you've said  
 17 it, bogeyman". I said, "I've become something of  
 18 a bogeyman, haven't I?", and she understood that point.  
 19 Again she's the one that knew about Interfauna but  
 20 she didn't tell anyone, which I found hard to believe.  
 21 She talked of the fear. A lot of them talked about the  
 22 fear when in relation to me -- not what I was doing but  
 23 it was always in fear of what I might do.  
 24 MR JUSTICE NICKLIN: Yes.  
 25 MR CURTIN: And that was -- I asked a number of questions.

1 So it wasn't -- yes, Mr Manning says it at the start.  
 2 It's like I could be acting there totally reasonably,  
 3 but, "Is the guy going to flip in a minute?". And,  
 4 again, that was covered heavily too much on what they'd  
 5 read.  
 6 [Redacted name]  
 7 Oh my God. My sister told me -- that's not  
 8 wilful --  
 9 MR JUSTICE NICKLIN: Carry on, Mr Curtin.  
 10 MR CURTIN: I was going to bloody start the day today with  
 11 apologising. It's a sub-conscious thing.  
 12 MR JUSTICE NICKLIN: Carry on.  
 13 MS BOLTON: My Lord, I'm conscious again that we have the  
 14 public gallery.  
 15 MR CURTIN: I'll speak to these people --  
 16 MR JUSTICE NICKLIN: Well, you're actually drawing more  
 17 attention to it now by doing this.  
 18 MS BOLTON: My Lord, the point is --  
 19 MR JUSTICE NICKLIN: Right. Well, okay then.  
 20 The name that Mr Curtin just said is a name in  
 21 respect of which there are reporting restrictions.  
 22 Nobody can publish the name of that person. All of you  
 23 present are now aware of that. If you need to see the  
 24 order that imposes that restriction, you can ask the  
 25 Clerk of the Court and he or she will provide that to

1 you. All right? Everybody understand? Right. Thank  
 2 you.  
 3 MR CURTIN: Again, I apologise.  
 4 She saw Camp Beagle as a smokescreen and she's one  
 5 of the people, the long-time workers -- I do apologise  
 6 for what I just did. It's a subliminal thing I've got  
 7 obviously with the bloody name. It's from knowing it  
 8 and not telling anyone about it.  
 9 MR JUSTICE NICKLIN: Carry on, Mr Curtin. Let's not make  
 10 any more --  
 11 MR CURTIN: Okay. She's one of the workers that comes into  
 12 sort of a bit of a pattern within them, is that in the  
 13 witness statements it's like there was a golden  
 14 nostalgia era of the anti-vivisection movement, when we  
 15 weren't that bad in the past, but "These lot are really  
 16 bad". And once I remind her about how -- in terms of  
 17 like vivisection workers, how bad it really was back in  
 18 the 80s and the 90s, I kind of had to refresh their  
 19 memories.  
 20 She believed that I was the boss. Again,  
 21 Connie Jurtin, the hate site, she'd seen that. We  
 22 haven't talked about the police going in. There was  
 23 a meeting that took part in the MBR site. That was  
 24 recollected by a number of people, and one of the  
 25 workers -- I haven't got it in front of me -- they were

1 able to ask police questions, according to their  
 2 witness, which I found -- perhaps it's standard  
 3 behaviour, but, again, it's one of the reasons why I'm  
 4 here today, is because I've become a demonised person.  
 5 I've finished that particular section now and I just  
 6 want to apologise once more for saying her name.  
 7 Witness G -- I've got this. That's the -- witness G  
 8 is the one on paragraph 11, section 20, which might be  
 9 12.20, and your question:  
 10 "Is it correct that the healthy dogs get used for  
 11 the bleeding procedure?  
 12 "Answer: That is correct [as read]."  
 13 Witness G talked of, again, in the past, she would  
 14 describe herself as a "kennel assistant". So the damage  
 15 caused by Camp Beagle is not -- hasn't come out of  
 16 a bubble. There's a history between the  
 17 anti-vivisection movement and companies like MBR where,  
 18 because things have gone on in the past, there's  
 19 a culture of secrecy that's endemic.  
 20 Again, they'd heard about allegations of grave  
 21 digging. We've had chats about the activists. I might  
 22 have seen a post or two.  
 23 She said:  
 24 "Finally, I don't believe I said anywhere in my  
 25 statement that you threatened or intimidated me [as



1 read]."  
 2 That was actually, I'd say, a common type of  
 3 grudging conclusion that I can get from a lot of  
 4 witnesses, that even then said, "I find Mr Curtin  
 5 particularly the most intimidating". There was nothing  
 6 to back that up.  
 7 I think that's my message there. So if I can just  
 8 spend the next five minutes, couple of minutes, just  
 9 summing up really.  
 10 The seven acts of trespass, evidently, because it's  
 11 strict liability, I'm stuck with that.  
 12 What damage was sustained by -- again by --  
 13 I honestly feel if I've caused any financial damage  
 14 through -- if the camp has caused any financial damage,  
 15 whether that be through successful protesting or even if  
 16 the camp had done anything untoward, the damages in this  
 17 case have been suffered by -- in America. MBR Acres,  
 18 they can't possibly -- well, they can. Any damage that  
 19 I've caused to them, any financial damage -- but it's up  
 20 to them to do that. But I'm not up against MBR Acres.  
 21 They can't -- a small company like MBR Acres can't spend  
 22 millions of pounds to claw back their financial damages.  
 23 It's just quackery. It doesn't make any sense. Any  
 24 damages against me, speak to the big boss in America.  
 25 That's the one who has actually suffered the losses.

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1 MBR Acres, they're a holding company, they're a going  
 2 concern, they're actually subsidised each year -- on  
 3 14 June this year, MBR Acres in America -- Marshall Farm  
 4 Group Limited would choose to subsidise them all over  
 5 again.  
 6 So I want to conclude. So, by those acts of  
 7 trespass, what were the damages inflicted by me?  
 8 Facilitating protests. Where's the list? I've got it  
 9 here. I'll finish with this.  
 10 The trespass on 13 July, megaphone, "Shame on you,  
 11 shame on you". If I hadn't been there, things would  
 12 have been different. Because I was there, workers,  
 13 their absolute free passage was -- I helped to disrupt  
 14 in that, but they didn't receive any damages because of  
 15 my presence. They actually received a bonus because  
 16 I made the situation quicker than what it would have  
 17 been. So there haven't been any damages inflicted on  
 18 the company from 13 July or 17 July.  
 19 Again, 8 September, I put here, it's just a classic  
 20 of the cars are going in and the cars are going out.  
 21 The same thing on 13 September.  
 22 So by me standing on the property, pointing at  
 23 a security guard, by me banging on the gates, shouting  
 24 at nobody because there was nobody on site anyway, "Open  
 25 the effing gates", substantial damages have not been

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1 incurred by my behaviour.  
 2 Let me think if I need to say anything else.  
 3 MR JUSTICE NICKLIN: Well, shall we have a look at the draft  
 4 order because this may help you make any final further  
 5 submissions that you wanted to.  
 6 MR CURTIN: Have you got another copy of it there? I know  
 7 you gave me a copy yesterday. (Handed)  
 8 First of all, before this trial -- and I haven't  
 9 misled the court in any way -- I told you I was  
 10 suffering from mental health anxieties, but when I --  
 11 I've explained why I used to stand here and say, "This  
 12 farce of spending all this money can be finished today  
 13 by this undertaking", and I don't regret that and  
 14 I wasn't misleading the court then. For example, they  
 15 wanted to -- and they still want to stop me flying the  
 16 drone.  
 17 MR JUSTICE NICKLIN: Let's just go through it one by one.  
 18 MR CURTIN: Okay.  
 19 MR JUSTICE NICKLIN: Paragraph 1 on page 2, what they want  
 20 an order is paragraph 1(1), so this is a trespass  
 21 injunction covering (a) the Wyton site, (b) the whole  
 22 site. You say I shouldn't grant an injunction against  
 23 you for trespass anyway because there's no need, but, in  
 24 any event, there's no evidence that you were threatening  
 25 to trespass on the whole site?

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1 MR CURTIN: Yes.  
 2 MR JUSTICE NICKLIN: Two, now, this is the exclusion zone.  
 3 MR CURTIN: Can I address it as we go?  
 4 MR JUSTICE NICKLIN: Yes.  
 5 MR CURTIN: So, one, it's like with most -- with nearly  
 6 everything else in this trial, I don't want to hand  
 7 anything to you on a plate.  
 8 MR JUSTICE NICKLIN: I know.  
 9 MR CURTIN: It won't change my life if you stop me from  
 10 trespassing because the only reason I can imagine to  
 11 trespass would be to do something a bit spicy anyway,  
 12 which might come under aggravated trespass. I have no  
 13 business to be in there anyway unless it's protesting,  
 14 and then that could be aggravated trespass. So it's not  
 15 going to change my life, but I haven't -- the two bits  
 16 where I did stand in the driveway, put that into its  
 17 perspective, and the two bits where I should have known  
 18 better, there was a little bit of pink mist, a little  
 19 bit of anger, so do I need restraining in future?  
 20 I don't think I do.  
 21 B&K I've addressed you on. There's no evidence.  
 22 MR JUSTICE NICKLIN: So paragraph 2 is the exclusion zone.  
 23 We've discussed that this morning, which is whether or  
 24 not I grant an exclusion zone. It's for me to decide  
 25 how best to -- if I do decide to impose any

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1 restrictions , what those restrictions are and how they  
 2 are best to be framed. There are two different  
 3 approaches to this. One is an exclusion zone type of  
 4 approach; the other is more directly to prohibit  
 5 particular conduct. So you don't need to worry --  
 6 that's something that I need to work out.  
 7 Three is the obstruction paragraph:  
 8 "Approach and/or obstruct the path of any vehicle  
 9 directly or entering or exiting the area marked in black  
 10 hatching. Save for the avoidance of doubt, it would not  
 11 be a breach (inaudible) if a vehicle was obstructed as  
 12 a result of emergency [as read]."  
 13 MR CURTIN: So, for me, as a protestor -- and I complained  
 14 about that thing as a generic term and, you know --  
 15 MR JUSTICE NICKLIN: I know.  
 16 MR CURTIN: -- but I'm using it for just common parlance.  
 17 Part of my job is definitely to have any contractors --  
 18 we've had contractors going in that have done a U-turn  
 19 and said, "I'm a dog lover". I think I produced it as  
 20 part of my package, a company called Zircon, who were  
 21 sending pictures of the dogs who didn't realise. To  
 22 take that away from me, the lorry coming in from  
 23 Germany, "Here you are, mate. Leaflet, boss" -- even if  
 24 they can't speak English, "Leaflet, boss".  
 25 MR JUSTICE NICKLIN: I need to think about that, Mr Curtin,

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1 that aspect. I've got that point.  
 2 Four is:  
 3 "Approach, slow down or obstruct any vehicle which  
 4 is travelling to or from the first claimant's land ... or  
 5 within one mile in either direction [as read]."  
 6 MR CURTIN: Again, speaking now, casually, I don't need to  
 7 ever arrange another funeral march. The world is -- the  
 8 case to fight vivisection is not going to be dependent  
 9 on a funeral march. It's not going to change my life.  
 10 I can't think of a single -- the obvious one there would  
 11 be --  
 12 MR JUSTICE NICKLIN: The point that you could make -- and  
 13 it's a point I've made before -- which is we've  
 14 discussed today about the extent to which protestors  
 15 could march down the B1090 with the permission of the  
 16 police, for example, if they give them notification  
 17 under the Public Order Act. That could -- if I granted  
 18 an injunction in those terms, that could prevent you  
 19 from taking part in that march. That wouldn't be an  
 20 order that I would be minded to grant ordinarily, so,  
 21 again, it's a matter I'll have to take away and think  
 22 about. Essentially what the claimants are objecting to  
 23 is the obstruction of vehicles further away from the  
 24 Wyton site.  
 25 MR CURTIN: Yes, they can do it from a mile and an inch.

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1 Let me just -- while I'm at it -- are we okay for  
 2 like another five minutes/ten minutes or so?  
 3 MR JUSTICE NICKLIN: Yes.  
 4 MR CURTIN: "Approach, slow down or obstruct any vehicle  
 5 which is travelling ... [as read]"  
 6 Again, what immediately comes to mind -- as I said,  
 7 I can't think of a single circumstance, but then I think  
 8 of the dog van. The dog van really, really, really  
 9 rises things. I have never -- because there's laws in  
 10 this country where the police get involved. There's  
 11 such thing as the British police. I can't stop --  
 12 I might want to stop a dog van, I wish I -- I do want to  
 13 stop a dog van. You know, I do. Of course I want to  
 14 stop them going to the laboratory. But I have  
 15 a horrible, powerless, impotent feeling where I can't  
 16 and I know I can't. It's like -- other people,  
 17 especially this new bunch of people, "Argh, stop the  
 18 vans". I understand that. It was a massive battle.  
 19 MR JUSTICE NICKLIN: The other point -- if you had  
 20 a representative here, the other point the  
 21 representative would point out is that the claimants are  
 22 alleging that that incident when you're crossing the  
 23 road was you obstructing a vehicle.  
 24 MR CURTIN: Yes, I live in that place. I cross the road  
 25 hundreds of times.

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1 MR JUSTICE NICKLIN: What your representative would say is  
 2 that, if I'd made an injunction in those terms, then  
 3 Mr Curtin could find himself on the end of a contempt  
 4 application simply as a result of crossing the road.  
 5 MR CURTIN: Yes, and I live there. I kind of -- I do live  
 6 there and we've had things thrown at us. We get  
 7 a little bit of antisocial movement. There's always  
 8 sorts of reasons why -- "Oy, oy, come back here", so,  
 9 yes, but I'm sure you'll be minded with that.  
 10 I want to talk about the dog van there, without an  
 11 injunction. Before the injunction other people wanted  
 12 to stop the dog van. I wanted to but I never set out to  
 13 because you can't. They're going to remove you. You're  
 14 not going to save those dogs by stopping the dog van.  
 15 The dog van is going to go to the lab, I can tell you  
 16 now.  
 17 Five, fly drone over the site. You deal with that  
 18 as you wish because neither are going to prevent -- yes,  
 19 they make -- it would be an unnecessary restriction,  
 20 an unnecessary burden, but if you extend it to the  
 21 persons unknown, it's going to become really weird and  
 22 unpoliceable. How the hell is anyone going to know?  
 23 You're going to be hit with a load of --  
 24 MR JUSTICE NICKLIN: Mr Curtin, don't worry about the  
 25 persons unknown aspect. That's something I have to

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1 wrestle with, not you.  
 2 MR CURTIN: Okay. So against me there's two bits of  
 3 evidence. Really, one is from what I deliberately  
 4 supplied via Facebook, hoping it would be picked up --  
 5 here we are. We're flying a drone, it's 50 metres. The  
 6 other one is me asked, "How many times do you fly the  
 7 drone?". I could have given some obtuse answer.  
 8 I think I said "at least once a week". So a regular  
 9 drone flyer, and you can ban me from going over the site  
 10 and you can -- I think there's CAA restrictions anyway  
 11 on how high -- there is the CAA restrictions that exist  
 12 anyway, so do with that as you will.  
 13 I would go back to the damage to the company -- the  
 14 damage has been terrible by the camp being there, by the  
 15 fact that we protest. We create all sorts of -- each  
 16 time we put any drone footage out, it causes damage.  
 17 Each Daily Mirror headline is damage.  
 18 And you often used to say -- you used to say,  
 19 "Do you want me to ban the Daily Mirror as well?", so  
 20 you will be -- by that, Mr Farmer(?) here, he's not  
 21 going to be able to get his pictures like he'd like to  
 22 of the drone.  
 23 Number four, the last one.  
 24 MR JUSTICE NICKLIN: Six, I think.  
 25 MR CURTIN: Yes, sorry. I don't know -- that's like

1 a rabbit out of the hat that needs liberating. I don't  
 2 know where the hell that came from. They haven't  
 3 offered any evidence at all that I have ever filmed  
 4 activities at the gate in order to -- well, they don't  
 5 even say why they want it.  
 6 MR JUSTICE NICKLIN: Well, the cause of action that  
 7 underpins this paragraph of the injunction is  
 8 harassment, but there we are.  
 9 MR CURTIN: Any bit of recording, there's no evidence.  
 10 There's evidence that I want to record as much as I can  
 11 about MBR Acres and it's always with a view to what they  
 12 do to the animals.  
 13 MR JUSTICE NICKLIN: Well, the point that the advocate would  
 14 make on your behalf is that, if I had granted an  
 15 injunction in those terms, then the occasion between you  
 16 and Employee V would be a breach of the order --  
 17 MR CURTIN: Yes.  
 18 MR JUSTICE NICKLIN: -- and your argument is that that would  
 19 be a serious infringement with your Article 10 rights  
 20 because essentially, as you described in your evidence,  
 21 you were at least in part -- at least how you thought it  
 22 was -- discharging a journalistic responsibility there  
 23 because you were reporting on what you wanted to say  
 24 about the MBR site.  
 25 MR CURTIN: Yes, and even though I live there, it would

1 require me -- every time I get my phone out and put my  
 2 camera on, to never point it in the direction of MBR and  
 3 there could be some -- a trolley could tip over or I'd  
 4 see some drone footage of some cages stacked up and  
 5 unintended and then I'd have to stop filming once  
 6 a worker comes out. God forbid if a worker looked up.  
 7 I have never recorded a single image of MBR with a view  
 8 to like, "Gotcha, you're in trouble now. I've got your  
 9 face". Never done it, never interested in it. But this  
 10 would massively -- this would hugely have an impact  
 11 and -- yes, yes, it's a bit like Susan Pressick's B&K  
 12 thing, this one. It's like please strike it out because  
 13 I don't know where it comes from, at this last minute,  
 14 and there's no evidence that I've ever done anything  
 15 untoward with any of the images that I've ever captured.  
 16 I think the rest of it would be me just going "blah  
 17 blah blah". I've finished and, again, I thank you  
 18 for -- I don't know -- being a judge really. But I've  
 19 got faith in you and you're the first judge I've got  
 20 faith in, so I look forward to seeing your difficult  
 21 wording and -- yes.  
 22 MR JUSTICE NICKLIN: Thank you, Mr Curtin.  
 23 Yes.  
 24 Reply submissions by MS BOLTON  
 25 MS BOLTON: My Lord, I have a couple of points I would like

1 to just pick up on.  
 2 MR JUSTICE NICKLIN: Right.  
 3 MS BOLTON: My Lord, just to clarify, as I explained when we  
 4 first had discussions at the beginning of these  
 5 proceedings about Wendy Jarrett, the limited basis on  
 6 which the claimant relies upon Wendy Jarrett is for the  
 7 purpose of you exercising your discretion and the impact  
 8 if MBR were to close down, which she dealt with in her  
 9 witness statement. That is the limited way in which the  
 10 claimant relies upon Wendy Jarrett.  
 11 A couple of points I just wanted to pick up,  
 12 my Lord. Mr Curtin suggests that most of the witnesses'  
 13 views on him were to do with what they had read about  
 14 him, in particular on the Connie Jurtin website. Most  
 15 of the witnesses hadn't read the Connie Jurtin website.  
 16 One or two were aware of his arrest for one particular  
 17 criminal offence, but others, such as the  
 18 Production Manager, for instance, made it clear that  
 19 they were very well aware of what was the correct  
 20 criminal offence that Mr Curtin had been sent to prison  
 21 for. So to characterise it as myth or bogeyman wasn't  
 22 accepted by the majority of the witnesses.  
 23 Mr Curtin also suggested, in relation to the  
 24 Production Manager, that she had admitted to being  
 25 a puppy killer. I think, if you look -- it's at Day 5,

1 page 45, lines 1 to 5 in the transcript -- there's  
 2 a section where Mr Curtin put it to a couple of the  
 3 witnesses that there was nothing in the witness  
 4 statements about him when in fact there was and there  
 5 were specific incidents about him. A number of them  
 6 were not challenged, some of them were challenged, but  
 7 the Production Manager picked him up and said, "There is  
 8 a section, I believe, it's on page 25, where you're  
 9 shouting and pointing a finger [as read]", and Mr Curtin  
 10 said, "Ah, yes, calling you a puppy killer. That's  
 11 correct, isn't it? [as read]", and she says "That's  
 12 correct". That's the context. It's not in any other  
 13 way.

14 The other thing is -- just as quick examples because  
 15 there wasn't a lot, obviously -- and it's not  
 16 a criticism. I appreciate Mr Curtin is a litigant in  
 17 person -- but there wasn't a lot of transcript  
 18 references and I think some of those were a little  
 19 confusing and not necessarily accurate. So I would ask  
 20 your Lordship, if your -- again, if the court needs any  
 21 assistance on something Mr Curtin has said that's in the  
 22 transcript, we would happily look at it and provide the  
 23 court with the references.

24 MR JUSTICE NICKLIN: Thank you. That's very kind.

25 MS BOLTON: I'd simply say the -- just to give examples,

1 Mr Hardy gave evidence of an incident on 13 July  
 2 involving Mr Curtin and the impact of that incident;  
 3 again, 17 July, where he said he was terrified by an  
 4 incident involving Mr Curtin. The Production Manager's  
 5 evidence again deals with incidents on 18 and  
 6 13 September, as do a number of employees. So in their  
 7 evidence there are a number of incidents which explain  
 8 the impact that Mr Curtin's activities at the site had  
 9 on them.

10 Looking at the draft order, my Lord, just to explain  
 11 how we set this out, you'll see that some of it is in  
 12 italics. The reason for that is in relation to perhaps  
 13 1(ii), depending on -- we've submitted that the common  
 14 law right to access the highway runs to the midpoint of  
 15 the highway adjacent to the MBR land. Now, we haven't  
 16 proposed cross-hatching at any point that would go quite  
 17 as far as that. Indeed the exclusion zone didn't go  
 18 quite as far as that on one side of the premises.

19 But what we've done is we've basically indicated  
 20 that if the court was minded to grant a form of  
 21 exclusion zone that covered any part of the common law  
 22 right, that the wording of it could be "the areas marked  
 23 with black hatching", so it's nice and clear, and then  
 24 what we've -- the italics bit is what we say is the --  
 25 would actually, on our case, be the extent of the common

1 law rights that we would be entitled to say the court  
 2 could properly protect on the basis of our lawful right  
 3 to access the highway from the land.

4 So what we're trying to do there is indicate to the  
 5 court that perhaps a simple way, if there was to be an  
 6 exclusion zone, it would be to use black hatching. How  
 7 far that goes was simply what we've identified in  
 8 italics.

9 The next two clauses are clauses which are currently  
 10 featured in the interim order and your Lordship will  
 11 remember that (iii) was the original order granted by  
 12 the court in November 2021 and then extended to cover  
 13 further along the road because it then moved. We say we  
 14 have obstructions on the highway, we rely on incidents  
 15 of that which are a public nuisance and we apprehend,  
 16 unless that's restrained, again it will simply progress  
 17 up the road.

18 My Lord, you've seen the flying of drones  
 19 prohibition. I don't think I need to make any more  
 20 submissions on that, my Lord. All I would say is  
 21 whether or not it prevents recording that could be  
 22 recorded from somewhere else isn't the test of whether  
 23 it's a trespass. So I'd ask the court to bear in --  
 24 one, the claimant doesn't accept that everything that  
 25 we've seen in all the drone footage could have been

1 recorded from the boundary, but that's not the test  
 2 because the test has to be is there a trespass and then  
 3 how the court should deal with that.

4 My Lord, I don't shy away from the fact that there  
 5 are -- sorry, my Lord, there was one other point on the  
 6 highways obstruction clause. Your Lordship raised the  
 7 one which concerned Mr Curtin walking in front of  
 8 Ms Read's car. We say the video shows that Mr Curtin  
 9 has seen her before she moves. We say it is deliberate.  
 10 But again I remind the court, the court in any event has  
 11 currently built into the injunction a requirement that  
 12 there be permission --

13 MR JUSTICE NICKLIN: Not against Mr Curtin. It's against  
 14 persons unknown.

15 MS BOLTON: Sorry, my Lord, apologies. Your Lordship is  
 16 correct. But that is obviously something the court can  
 17 do if it has -- if it feels that that's the only way to  
 18 strike the fair balance.

19 My Lord --

20 MR JUSTICE NICKLIN: I don't anticipate that the claimants  
 21 will bring in future --

22 MS BOLTON: No.

23 MR JUSTICE NICKLIN: -- a contempt application that the  
 24 court thinks is lacking substance.

25 MS BOLTON: My Lord, no, indeed.

1 MR JUSTICE NICKLIN: A couple of points on the draft order.  
 2 First page, I think this is just a legacy and it's not  
 3 been picked up, but:  
 4 "Breach of this order by any person bound by it may  
 5 result in arrest by the police [as read]."  
 6 That's not going to happen.  
 7 MS BOLTON: My Lord, I'm not sure how that's snuck in there.  
 8 I do apologise. I think we've obviously -- in  
 9 reformatting, we've picked up an old version. I do  
 10 apologise.  
 11 MR JUSTICE NICKLIN: That's all right. I thought that must  
 12 be the reason.  
 13 Then underneath, on the next page, "The order", on  
 14 the third line it says:  
 15 "To restrain unlawful means conspiracy [as read]."  
 16 That's not the basis on which the application was  
 17 made.  
 18 MS BOLTON: I apologise. I think --  
 19 MR JUSTICE NICKLIN: It's just a hangover. It's a hangover  
 20 from an earlier document.  
 21 MS BOLTON: Yes, unfortunately I got to the stage where  
 22 I didn't any longer have a Word version, I think, of  
 23 when -- we've amended it, sorry, and we thought we had  
 24 the most up-to-date version of the -- more than just the  
 25 prohibitions, it was the whole text from the most recent

1 judgment, but it's clearly not, so I apologise.  
 2 MR JUSTICE NICKLIN: That's all right. These things happen.  
 3 Right.  
 4 MS BOLTON: My Lord, I should just pick up on one other  
 5 point. We totally accept that there is no evidence  
 6 against Mr Curtin that he has been to the B&K site.  
 7 Obviously our case has always been that's pure  
 8 quia timet relief in relation to most of the named  
 9 defendants. That's obviously a matter for the court.  
 10 MR JUSTICE NICKLIN: Yes.  
 11 MS BOLTON: Sorry, there is one other matter I'm afraid  
 12 I have to bring to your Lordship's attention which isn't  
 13 in relation to Mr Curtin. It's in relation to  
 14 Mr Broughton. Mr Broughton is now on bail and  
 15 your Lordship will recall that you stayed the claim  
 16 against him because obviously it may have proved  
 17 difficult to serve him whilst he was in custody.  
 18 MR JUSTICE NICKLIN: Well, it wasn't so much service; it was  
 19 the idea that he was in absolutely no position to  
 20 prepare for a trial, still less participate in one in  
 21 a meaningful sense, if he was going to be in custody.  
 22 MS BOLTON: My Lord, my understanding is that he comes to  
 23 trial at the end of July. My proposal would be that --  
 24 we suggest that the claim should remain stayed.  
 25 MR JUSTICE NICKLIN: Yes, wait and see what happens to his

1 criminal trial.  
 2 MS BOLTON: Wait to see what happens. I just thought  
 3 I should raise it with you.  
 4 MR JUSTICE NICKLIN: Thank you very much for letting me  
 5 know.  
 6 MR CURTIN: Can I come back very briefly on Wendy Jarrett,  
 7 very briefly, because I don't think -- you don't seem  
 8 to -- it's a part of the case that we've never really  
 9 covered. If the case is from Wendy Jarrett that, by  
 10 Camp Beagle being successful and having a detrimental  
 11 effect on MBR Acres, if that would be a damage to the  
 12 country as a whole because they do this ground-breaking  
 13 medical research, let me just remind you what the  
 14 company is. It's an American multi-national that came  
 15 here. It bought out its competitor, Harlan Interfauna.  
 16 It has operated with a monopoly. Its other rival,  
 17 Envigo, is now involved in so much controversy because  
 18 they have been shut down in America. They're in  
 19 trouble. It's open, if MBR Acres did suffer some  
 20 damages -- I think that's why you brought them --  
 21 MS BOLTON: No. If I clarify the point, it might help  
 22 Mr Curtin. The point is it isn't the ground-breaking  
 23 research of MBR Acres. The point is if MBR Acres are  
 24 the only breeder in the company and it's the impact on  
 25 medical research.

1 Secondly, as was made clear by Ms Jarrett and  
 2 Ms Pressick, that obviously, whilst there is a shortage,  
 3 so that would cause a real problem from the point of  
 4 view of even getting the dogs from somewhere else --  
 5 again even the dogs being flown from somewhere else, if  
 6 that became not occasional, but all dogs, that's  
 7 again -- putting aside that they're not available, in  
 8 any event that would be more of a welfare concern. But  
 9 the impact point here is the point that, if the claimant  
 10 closes, there isn't that supply and, as the law stands  
 11 at the moment, there are those requirements, so the  
 12 impact therefore follows that it has on the UK.  
 13 That's the only point. It's not about anything more  
 14 than that and I think I was fairly clear at the  
 15 beginning that that was the part of Ms -- Ms Jarrett was  
 16 questioned quite a bit, but that was the only part that  
 17 we're saying is relevant to you, my Lord, because you  
 18 have a discretion to exercise and obviously we say it's  
 19 quite a significant impact.  
 20 MR JUSTICE NICKLIN: Right.  
 21 MR CURTIN: And I would reply -- one last sentence, last  
 22 thing I'll say -- there is no legal requirement in this  
 23 country to carry out tests on dogs. There's rodent and  
 24 non-rodent. It would not be --  
 25 MR JUSTICE NICKLIN: Okay. I've learnt all about this

1 during the course of the trial . I know what the  
 2 position is regarding Ms Jarrett. I know what your  
 3 objections are to her evidence. It's not the most  
 4 significant area of the case. I will reflect on what  
 5 the evidence is and whether it helps me in any of the  
 6 decisions I have to make.  
 7 MR CURTIN: Okay.  
 8 MR JUSTICE NICKLIN: Now, we're going to see, all of us --  
 9 we're going to meet again on -- is it June 20?  
 10 MS BOLTON: The 26th, my Lord.  
 11 MR JUSTICE NICKLIN: Mr Curtin, you're being represented on  
 12 that occasion.  
 13 MR CURTIN: I am, yes, by --  
 14 MS BOLTON: Apologies, my Lord, it's the 22nd.  
 15 MR CURTIN: Are you not minded to drop the contempt,  
 16 considering what you've heard, because it will be a very  
 17 similar nature -- yes, yes, that's me.  
 18 MS BOLTON: My Lord, obviously we haven't touched that  
 19 incident because it's the committal incident.  
 20 MR JUSTICE NICKLIN: I'm not inviting a discussion about it.  
 21 I just wanted to know that everybody was ready.  
 22 MR CURTIN: Yes.  
 23 MR JUSTICE NICKLIN: I believe I've given directions  
 24 previously about skeletons and all the rest of it. Do  
 25 you have all the directions you need to get yourself

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1 fairly to the trial ?  
 2 MS BOLTON: Ours was submitted a long time ago. What we  
 3 haven't had is there has been adjournments for there to  
 4 be skeletons, any evidence filed , because Mr Curtin is  
 5 represented, and I appreciate that that's been one of  
 6 the requests for one of the previous adjournments as  
 7 well, but we've still not had anything, so it might --  
 8 MR JUSTICE NICKLIN: What, you want -- I haven't given you  
 9 directions?  
 10 MS BOLTON: No, you gave -- okay. We haven't had directions  
 11 for filing of evidence. I think there was -- okay, no,  
 12 there isn't on this occasion, my Lord, so that may be  
 13 helpful because it -- I'm not sure --  
 14 MR JUSTICE NICKLIN: Can you just help me? Send an email to  
 15 my clerk that tells me what the last order governing  
 16 this was and what it says.  
 17 MS BOLTON: Yes.  
 18 MR JUSTICE NICKLIN: Just point me in the direction of it.  
 19 I'll have a look at it. The order for evidence for  
 20 Mr Curtin needs to be carefully drafted. It's a sort of  
 21 voluntary, "If you are intending to file evidence, you  
 22 must do it by this date" --  
 23 MS BOLTON: Yes.  
 24 MR JUSTICE NICKLIN: -- but there's no power to compel and  
 25 nor is there a power to refuse. Ultimately the

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1 defendant in a contempt application can decide on the  
 2 day that he or she is going to give evidence in his or  
 3 her own defence and it is what it is. In that respect  
 4 it's a bit like criminal proceedings.  
 5 So it's a permissive sort of, "If you're going to  
 6 file it, do it by this date", but I just need to make  
 7 sure that we've got -- as it were, locked in the  
 8 necessary directions to ensure people have done their  
 9 skeletons and bundles, things like that.  
 10 MS BOLTON: My recollection is that, some time ago, when it  
 11 was listed for a previous date, there might have been  
 12 some (inaudible - overspeaking).  
 13 MR JUSTICE NICKLIN: Okay, just find that order. Also,  
 14 I haven't looked at the CE filing yet, but can you just  
 15 let -- in the email you send, can you make sure I get  
 16 details of Mr Curtin's solicitors so that my clerk can  
 17 loop them into the communications?  
 18 MS BOLTON: Yes.  
 19 MR JUSTICE NICKLIN: All right. Good. Right. Thank you  
 20 very much, everybody.  
 21 (4.34 pm)

(The hearing adjourned)

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