

OPUS2

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

Day 3

April 27, 2023

Opus 2 - Official Court Reporters

Phone: 020 4518 8448

Email: transcripts@opus2.com

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

Thursday, 27 April 2023

1 (10.30 am)

2 (Proceedings delayed)

3 (10.34 am)

4 MR JUSTICE NICKLIN: I think that Ms Jaffray wants to
5 address me.

6 MS BOLTON: My Lord, yes.

7 MR JUSTICE NICKLIN: Ms Jaffray, hello. You're on mute at
8 the minute.

9 MS JAFFRAY: Can you hear me now?

10 MR JUSTICE NICKLIN: I can, thank you very much.

11 MS JAFFRAY: Good morning. I just wanted to speak for
12 a minute, if that's okay.

13 MR JUSTICE NICKLIN: Go on then.

14 MS JAFFRAY: So last night, completely overwhelmed by the
15 amount of work and time that I had to put into the
16 trial, I sat all evening surrounded by paperwork but
17 I have so many other issues going on at the moment. So
18 coincidentally I looked in my spam email folder to find
19 something and saw many more emails from MBR that hadn't
20 actually -- hadn't come to my inbox so I hadn't seen
21 them. One of them was offering a settlement, so I was
22 talking to --

23 MR JUSTICE NICKLIN: Just pause for a moment. The
24 communications that you have with MBR's solicitors in
25

1

1 relation to settlement may be covered by privilege.

2 MS BOLTON: My Lord, they were open offers.

3 MR JUSTICE NICKLIN: Right. Okay. Carry on. That's fine,
4 Ms Jaffray.

5 MS JAFFRAY: Okay. So if that option is still there for me
6 to take, because I've got so many other things going on
7 right now, I would like to take it. I don't know how
8 Mr Curtin is still standing, to be honest with you,
9 because I know he's got a lot of stresses on top of
10 this. It doesn't change my opinion with how I view
11 MBR Acres and the part it plays in society, but I don't
12 feel that I can give it my best shot at all.

13 MR JUSTICE NICKLIN: Ms Jaffray, it's ultimately a matter
14 for you. I'm slightly concerned from the way that
15 you're presenting this morning that you may be
16 overwhelmed by all of this and you haven't got the
17 benefit of advice and representation and I don't want
18 you to feel forced into a settlement that you may regret
19 later, so ideally I would like to give you time to think
20 about things and to make a decision. I'm pretty
21 confident Ms Bolton will tell me if I'm wrong about
22 this, which is that if they have made an offer to you,
23 I suspect that offer will remain open. I don't think
24 that -- the claimants probably won't want to feel that
25 you have been in any way pushed into a settlement and

2

1 it's very important that, if you are going to settle the
2 proceedings, you do so willingly and without feeling
3 pressurised into doing it.

4 Now, what we're doing today -- what I was going to
5 propose, subject to hearing what Ms Bolton suggests, is
6 that you -- we have the witnesses today. I don't know,
7 were you planning on asking them some questions?

8 MS JAFFRAY: I was, but I haven't even looked through the
9 statements that I wanted to cross-examine them on.
10 I just -- I can't get my head round any of it.

11 MS BOLTON: My Lord, if I may just interject. There is one
12 point. Ms Jaffray has had the offer in the past, it's
13 not a different offer, and she has formally rejected it
14 in the past. We're quite happy to agree(?), but just so
15 the court is aware, that's not a last-minute offer that
16 Ms Jaffray has just found. It has been made previously
17 so she will have had some time to reflect on it.

18 MR JUSTICE NICKLIN: But it's perfectly apparent to me,
19 Ms Bolton, that Ms Jaffray is not -- she's quite upset
20 by this.

21 MS BOLTON: Yes.

22 MR JUSTICE NICKLIN: I would ordinarily be concerned that
23 somebody was -- in any circumstance where that was
24 apparent to me, I would want the litigant to go away and
25 think about things and then come back.

3

1 MS BOLTON: Yes.

2 MR JUSTICE NICKLIN: The problem is we haven't got a lot of
3 time for going away and thinking about things. We've
4 got to get on with the trial.

5 Ms Jaffray, Mr Curtin will have questions for the
6 witnesses today.

7 MS JAFFRAY: Yes.

8 MR JUSTICE NICKLIN: You'll be able to listen to the
9 questions he asks. By all means note down anything that
10 occurs to you. If you want to, you can simply adopt the
11 cross-examination that he has conducted because
12 I suspect, in many respects, you and he will share
13 a similar position in relation to what you want to
14 challenge by way of the witness evidence. So if you
15 just make a few notes while Mr Curtin is
16 cross-examining, they may prompt you to ask similar
17 questions yourself or you may say, "I'd like to adopt
18 Mr Curtin's cross-examination" or "I'd like to ask the
19 same questions".

20 MS JAFFRAY: Okay.

21 MR JUSTICE NICKLIN: I will make a note myself and I know
22 what the position is broadly from your position so we
23 can take stock then. What I'd like you to do is --
24 I know that there's a lot going on in your life and that
25 that has contributed to significant pressures on you.

4

1 It's very important that you — if you do take the step
 2 of resolving the proceedings on the basis that you've
 3 been offered by the claimants, that you do so having
 4 thought about it calmly and reached a settled
 5 conclusion; all right? So I would be happy for you to
 6 think about that overnight —
 7 MS JAFFRAY: Thank you.
 8 MR JUSTICE NICKLIN: — and you can communicate with my
 9 clerk and we can look at things then.
 10 MS JAFFRAY: Yes, thank you.
 11 MR JUSTICE NICKLIN: All right?
 12 MS JAFFRAY: Yes.
 13 MR JUSTICE NICKLIN: Okay. Right. Ms Bolton.
 14 MS BOLTON: My Lord, I call the claimants' first witness,
 15 Ms Susan Pressick.
 16 MR JUSTICE NICKLIN: Thank you.
 17 MR CURTIN: Can we do a little bit of housekeeping first?
 18 MR JUSTICE NICKLIN: Go on.
 19 MR CURTIN: I presented some documents overnight and I just
 20 presented some documents literally ten minutes ago,
 21 which I gather is outrageous but I didn't want to pull
 22 any rabbits out of the hat. It's a simple point. It's
 23 basically some BBC articles from protests relating to
 24 Bantin & Kingman back in 2009/2010. I refer you to
 25 paragraph 87 of Susan Pressick's statement, when she

5

1 says:
 2 "Prior to late June 2021, I had not experienced any
 3 protests at the B&K Hull Site, save for a minor protest
 4 at some point in 2013 ..."
 5 The BBC articles, there's five of them, and I'm not
 6 going to be exploring — except to say that they
 7 happened —
 8 MR JUSTICE NICKLIN: That sounds all right to me. Ms Bolton
 9 will — essentially carry on. Ms Bolton may object. If
 10 she has a reason to object, she will raise that
 11 objection with me and then we'll take stock; all right?
 12 But at the moment it seems to me legitimate because you
 13 pointed to the paragraph of Ms Pressick's witness
 14 statement that the question arises from. If you have
 15 material which you want to ask Ms Pressick about in
 16 light of what she said in her statement, that's fine.
 17 That's the process of cross-examination.
 18 MR CURTIN: If I may apologise with the same apology that
 19 I've attached every single apology that — pathetic,
 20 overwhelming, but I'm trying.
 21 MR JUSTICE NICKLIN: That's fine.
 22 MS BOLTON: My Lord, I would be grateful but I don't have
 23 it. I have the flight manifest that Mr Curtin wishes to
 24 rely upon, which I got this morning, but I don't have
 25 this latest one.

6

1 MR JUSTICE NICKLIN: I'm not sure I have anything. I've got
 2 your email that was sent to the court at 12.23 this
 3 morning but I've not had something since then.
 4 MR CURTIN: I've sent one to Mrs —
 5 MR JUSTICE NICKLIN: Oh, here it is.
 6 MS BOLTON: Can I understand what paragraph this evidence
 7 goes to, please? Can I just clarify that, please?
 8 MR JUSTICE NICKLIN: I've got it. Mr Curtin, what paragraph
 9 did you read from?
 10 MR CURTIN: 87.
 11 MR JUSTICE NICKLIN: Of which witness statement?
 12 MR CURTIN: Susan Pressick's 20th witness statement.
 13 MS BOLTON: My Lord, something is going wrong with my
 14 bundle. Apologies, my Lord. I just need to go to the
 15 right page.
 16 My Lord, I'm not ...
 17 MR JUSTICE NICKLIN: Mr Curtin, do you have copies of those
 18 documents?
 19 MR CURTIN: Yes.
 20 MR JUSTICE NICKLIN: Enough for you and the witness?
 21 MR CURTIN: Hard copies, I have not, no.
 22 MR JUSTICE NICKLIN: Okay. Nizana, can you print out the
 23 ...?
 24 MR CURTIN: I'd like to think this won't happen again
 25 because I've got now time. I'm on it. I'm on the case.

7

1 MR JUSTICE NICKLIN: Mr Curtin, don't worry about it. In
 2 many respects I admire any litigant in person who tries
 3 to defend themselves and you are unfamiliar. I don't
 4 suppose you've ever cross-examined a witness before.
 5 MR CURTIN: No.
 6 MR JUSTICE NICKLIN: So it's just these little practical
 7 things which — because you're going to ask the witness
 8 about a document — I know this because I've been doing
 9 this for half a lifetime — you have to provide copies
 10 so the witness can see what you're referring to. It's
 11 as simple as that. That's fine.
 12 If you need documents produced in order to ask
 13 a witness questions, if you aren't able to print them
 14 out yourself, just make sure that you send a copy to my
 15 clerk beforehand and we'll do our best to make sure that
 16 we can provide copies in court.
 17 MR CURTIN: I will.
 18 MR JUSTICE NICKLIN: All right?
 19 MR CURTIN: Yes, thank you.
 20 MR JUSTICE NICKLIN: Okay, Ms Bolton, I think we're ready.
 21 MS BOLTON: My Lord, in that case, I'll call our first
 22 witness, Susan Pressick.
 23 MS SUSAN PRESSICK (sworn)
 24 MR JUSTICE NICKLIN: Ms Pressick, feel free to sit down or
 25 stand, whichever you'll feel more comfortable with.

8

1 A. Thank you.
 2 MR JUSTICE NICKLIN: Please keep your voice up. It's a very
 3 big courtroom and everyone needs to hear; all right?
 4 A. Okay, yes.
 5 Examination—in—chief by MS BOLTON
 6 MS BOLTON: Ms Pressick, can you please tell the court your
 7 full name and your work address?
 8 A. It 's Susan Pressick and I work at B&K Universal at
 9 Grimston, Hull.
 10 Q. Thank you. Ms Pressick, you have some bundles there --
 11 my Lord, I'm going to take Ms Pressick to the witness
 12 statement that's in the persons unknown bundle because
 13 it 's the only complete version of the witness statement.
 14 MR JUSTICE NICKLIN: Okay.
 15 MS BOLTON: Ms Pressick, if you could turn to volume 2 of
 16 the persons unknown bundle, please, and if you could
 17 turn to page 445, please -- it's right at the front of
 18 that bundle, I believe.
 19 A. Yes.
 20 Q. -- if you can turn through to page 446, you'll see
 21 "Twentieth Witness Statement of Susan Pressick", and if
 22 you turn through the pages to page 608, you'll get to
 23 the end of that witness statement, and then from 608
 24 to 960 the exhibits referred to in that witness
 25 statement.

9

1 A. Yes.
 2 Q. If I could ask you, please --
 3 MR JUSTICE NICKLIN: Okay, sorry, I'm not in the right
 4 bundle. What's the ...?
 5 MS BOLTON: It should be volume 2 of the persons unknown
 6 trial bundles, my Lord.
 7 MR JUSTICE NICKLIN: Right, okay. Got it. Thank you.
 8 MS BOLTON: It starts at the beginning of the bundle.
 9 MR JUSTICE NICKLIN: Got it.
 10 MS BOLTON: Ms Pressick, if you could turn to the page with
 11 your signature, please -- it's page 608 --
 12 A. Yes.
 13 Q. -- you'll see there's a statement of truth for the
 14 witness statement.
 15 A. Yes.
 16 Q. Is that statement still true to the best of your
 17 knowledge and belief?
 18 A. Yes, it is.
 19 Q. Ms Pressick, I'm not going to ask you any further
 20 questions on your witness statement but Mr Curtin has
 21 provided a flight shipment manifest from -- which
 22 I believe was obtained. He'll correct me if I'm
 23 wrong -- from a Freedom of Information Act request to
 24 the Danish Government. Do you have a copy of that?
 25 A. No, I haven't.

10

1 MR CURTIN: I actually have.
 2 MS BOLTON: Can I hand a copy of that up and hand a copy up
 3 to the court, please? (Handed)
 4 MR JUSTICE NICKLIN: You're going to have to have very good
 5 eyesight for this.
 6 MS BOLTON: Ms Pressick, first of all, where would dogs for
 7 the purpose of medical research in this country come
 8 from if MBR Acres wasn't operating in the UK?
 9 A. They would have to come from our parent company in
 10 the US.
 11 Q. And could your parent company provide the dogs for the
 12 purpose of medical research in this country?
 13 A. No, not the quantity, no.
 14 Q. Why not?
 15 A. Because our breed in the UK tries to meet the supply,
 16 the Envigo facility in the US was closed due to
 17 different issues in the US, so we are the only supplier
 18 of beagles.
 19 Q. Why could they not just simply increase the supply from
 20 the US?
 21 A. Why could they not fly? Sorry?
 22 Q. Why could they not just ship the dogs from the US?
 23 A. Because of welfare, because of transfer of dogs would be
 24 difficult and the quantities of the dogs would be very
 25 difficult to achieve.

11

1 Q. What Mr Curtin has provided here, to take you through
 2 it, it suggests that -- if we look at -- well, first of
 3 all, if we look at 1.31, further into it, we can see
 4 that the nature of what is being shipped appears to be
 5 dogs.
 6 A. Hmm--hmm.
 7 Q. If we go to the beginning of the document, we can see
 8 that they're being exported from the US. Then we see,
 9 in the first line at 1.4, the country name is Denmark
 10 and the consignment and importer is Envigo in the UK.
 11 We can see that the date of that, if we look further on
 12 in the document, would appear to be around -- well,
 13 somewhere in the first half of 2022, it refers to
 14 a decision date, so I'm assuming that might be the day
 15 when it's requested. Could Envigo do that today? Could
 16 it ship dogs from the US?
 17 A. No, because it would be -- I doubt it would be Marshall
 18 dogs. It would have been their own dogs when they were
 19 in business before, I think August/September time on
 20 2022.
 21 MR CURTIN: Is there --
 22 MS BOLTON: No, sorry, I'm asking the witness questions.
 23 Are Envigo in the US able to ship dogs to the UK
 24 now?
 25 A. No, not to my knowledge, no.

12

1 Q. Looking at the other shipments — and we can see that
 2 we've got three in 2022, amounts 4, 4 and 35, why would
 3 they have come from the US when there's a breeding
 4 facility in the UK?
 5 A. It may be that the shortfall or the specific range of
 6 dogs wouldn't have met our supply and the customer would
 7 choose to go to the US.
 8 Q. But if the US wanted to supply all of the dogs to those
 9 customers for the UK, would that be achievable?
 10 A. There's a short — yes, but it depends on the shortfall
 11 which — since August 2022, for the whole of the US and
 12 Europe, that supply is strained sometimes and difficult
 13 to manage and it may be that the customer has moved
 14 their selection as well.
 15 Q. So, to be clear, Ms Pressick, if MBR shut down — so we
 16 see a limited number of dogs here on this manifest to be
 17 shipped from the US to the UK. Let's put aside welfare
 18 concerns which — you've given evidence of one of the
 19 reasons why you wouldn't do this. Putting aside welfare
 20 reasons, if MBR closed down tomorrow, would the US be
 21 able to provide all the requirements for medical
 22 research in the UK in the context of sending dogs from
 23 the US to the UK?
 24 A. No, there would be a huge shortfall to the UK.
 25 Q. If we look at 2023, again we see 128 shipments from the

13

1 US — dogs shipped from the US to the UK; yes?
 2 A. Yes.
 3 Q. Do you see that?
 4 A. Hmm—hmm.
 5 Q. So you see that's the last four entries on the manifest?
 6 A. Yes.
 7 Q. Why would they have happened?
 8 A. Between the customers, they may transfer their own
 9 shipments and locations and we would have transferred
 10 dogs to our supply for their needs.
 11 Q. Again, how many dogs would come from the US to the UK in
 12 a year?
 13 A. Because of the problem last year with Envigo, other than
 14 that it's very few dogs, very few shipments, a very low
 15 number. I would have to check the number but the
 16 percentage is very low.
 17 Q. You've given evidence that the US couldn't meet those
 18 demands, but, even if it could, would there be any other
 19 reason that this wouldn't be desirable?
 20 A. The transfers would be a problem. The logistics, the
 21 management and the delay to the UK study, customer
 22 impact, would be a lot bigger.
 23 Q. Why are there breeding facilities in the UK? Why has
 24 Marshall come to the UK?
 25 A. It was established in the UK to meet the UK demand with

14

1 less stress for the dogs and to keep a local UK supply.
 2 MS BOLTON: Ms Pressick, if you could wait there, there may
 3 be some further questions.
 4 Cross—examination by MR CURTIN
 5 MR CURTIN: So your employer is Bantin & Kingman?
 6 A. My employer is Marshalls. Bantin & Kingman is the
 7 company that I worked for, so Marshall —
 8 Q. You don't work for Bantin & Kingman?
 9 A. Bantin & Kingman was sold to Marshalls many years ago.
 10 Q. Okay.
 11 MR JUSTICE NICKLIN: Just so that we're clear, you get paid.
 12 Which company pays you?
 13 A. Marshalls.
 14 MR JUSTICE NICKLIN: Right.
 15 MR CURTIN: Would there be any chance — after I've finished
 16 speaking to the witness — a possibility of calling her
 17 back? I can ask.
 18 MR JUSTICE NICKLIN: You can ask. You'll need to show me
 19 and Ms Bolton what questions you would want the witness
 20 to answer.
 21 MR CURTIN: Okay.
 22 So your wages are paid by Marshall Farm Group
 23 Limited?
 24 A. Yes.
 25 Q. They also own the companies — is B&K Star(?) owned by

15

1 Marshall Group — B&K Star, Yorkshire Evergreen,
 2 Marshall Farms Group Limited, Marshall Farms Group
 3 International — are you aware of these companies?
 4 A. Is that — is there a reason for connecting them, the
 5 companies?
 6 Q. Yes, I'm trying to — because this injunction is made
 7 against MBR. You don't work for MBR, you work for the
 8 parent company of MBR, so I'm just trying to work out
 9 what authority you have to speak on behalf of MBR. You
 10 have no authority really to speak for MBR, would you
 11 say?
 12 A. I've been given authority to speak on behalf of MBR. My
 13 duties overlap and in my statement it refers to the
 14 senior directors giving me authority to speak on behalf
 15 of MBR.
 16 Q. Sorry, but when you carry out work on behalf of MBR,
 17 which we'll come to in a minute, who pays your wages?
 18 For working for MBR, who pays your wages?
 19 A. Marshalls. Marshalls own MBR Acres. Marshalls own
 20 B&K Universal. Marshalls pay my wages.
 21 Q. Okay. I'm just trying to establish whether you have any
 22 authority to speak here at all on behalf of MBR. It's
 23 a genuine question.
 24 A. Yes, and it describes it in my witness statement.
 25 Q. But you're not here voluntarily. You're being paid to

16

1 come today. Are MBR Acres paying your wages? It's
 2 not -- it's not an outlandish question. I'm just trying
 3 to establish who you are.
 4 A. Sorry, I'm ...
 5 MS BOLTON: My Lord, it's in the witness statement,
 6 paragraph 2. Ms Pressick has explained this. Mr Curtin
 7 should direct -- if he's challenging what Ms Pressick
 8 says, he should challenge it from her witness statement.
 9 MR CURTIN: Yes, okay. No problem.
 10 "I am employed by the Third Claimant ..."
 11 To me, I just find it quite irregular because I want
 12 to ask you questions about MBR Acres --
 13 MR JUSTICE NICKLIN: Well, just following up that point, I'm
 14 a little bit --
 15 MS BOLTON: Sorry, also, I should -- just to assist
 16 Mr Curtin, obviously in paragraph 43 on this area
 17 there's more detail.
 18 MR JUSTICE NICKLIN: Let's just concentrate on that first
 19 sentence, which is "I am employed by the Third
 20 Claimant". Ms Pressick --
 21 A. Yes.
 22 Q. -- I'm slightly confused as to the nature of your
 23 employment status if your actual wages are paid by
 24 another company.
 25 A. They're paid by B&K Universal which Marshalls -- I'm

1 contracted with and I'm paid by Marshalls' own company
 2 that manage my contract and my payroll.
 3 MR JUSTICE NICKLIN: Right. Sorry, I'm a little bit
 4 confused. Are you paid by more than one company?
 5 A. No.
 6 MR JUSTICE NICKLIN: So the company that pays your wages is
 7 Marshalls. What's its official title?
 8 A. Marshall BioResources are a trading name of
 9 B&K Universal of MBR Acres, so the official limited
 10 company at Companies House is B&K Universal, and
 11 likewise MBR Acres, that are registered at
 12 B&K Universal's address. So that's the connection as
 13 well.
 14 MR JUSTICE NICKLIN: So when you talk about being paid by
 15 Marshalls, that's a rather loose way of saying that this
 16 is the company within the brand?
 17 A. Yes.
 18 MR JUSTICE NICKLIN: Right, okay.
 19 A. Yes.
 20 MR JUSTICE NICKLIN: So Ms Pressick is employed by B&K, the
 21 third claimant --
 22 MR CURTIN: Yes.
 23 MR JUSTICE NICKLIN: -- which is, as you know, part of the
 24 group structure.
 25 MR CURTIN: Yes, I understand that fully. I am challenging

1 whether this witness is able to talk on behalf of
 2 MBR Acres. I am not sure what capacity because -- the
 3 boss of her company, "Could you do this for me on behalf
 4 of another?", that's what I'm trying to establish here.
 5 I'm not trying to pull any ...
 6 MR JUSTICE NICKLIN: Well, the companies are in the same
 7 group; in other words -- so in the United Kingdom, as
 8 I understand it, there are two companies, at least, so
 9 you have MBR Acres, the first claimant, and
 10 B&K Universal, the third claimant. Ms Pressick works
 11 for the third claimant, but, because of the overlap in
 12 their work, she has a responsibility between the two
 13 companies albeit that she's employed by the third
 14 claimant.
 15 MR CURTIN: Okay. Maybe I could make some ... I'm still
 16 rather confused, but let's go on. Let's go to
 17 paragraph 35 of your witness statement. Do you see
 18 that?
 19 A. Yes, I've got it.
 20 Q. "I understand from my role with the business and my role
 21 as the Establishment Licence Holder for both the Wyton
 22 Site and the B&K Hull Site, that it is a legal
 23 requirement that all potential new medicines intended
 24 for human use are tested in two species of mammal before
 25 they are given to ... volunteers ..."

1 Now, "Establishment Licence Holder", that's quite
 2 a responsible position, isn't it?
 3 A. It is.
 4 Q. You are the person directly responsible for running the
 5 establishment, staying within the law. It's
 6 a responsibility, isn't it, given by the Home Office --
 7 A. Yes.
 8 Q. -- so you should have some good understanding. Could
 9 you tell me -- you say you understand that "it's a legal
 10 requirement that all potential new medicines ...".
 11 Could you refer me under which law -- if it's a legal
 12 requirement, there must be a law that insists that the
 13 dogs that you breed are experimented on. That's what
 14 you're saying here. There's a legal requirement. Could
 15 you point me to the law, please?
 16 MS BOLTON: My Lord, that's in the other -- it's in
 17 Ms Jarrett's statement --
 18 MR JUSTICE NICKLIN: I know it is, but that's a legitimate
 19 question for him to ask. Ms Pressick is stating in her
 20 evidence so Mr Curtin is entitled to ask the question.
 21 MS BOLTON: My Lord, okay.
 22 MR CURTIN: Could you --
 23 MR JUSTICE NICKLIN: Do you know what the relevant
 24 legislation is?
 25 A. The legislation is the Animals (Scientific Procedures)

1 Act. The legislation for licences to carry out new
 2 medicines is under the licences provided by the
 3 Home Office to those parties that carry out potential
 4 drug development.
 5 Q. Ah, the Home Office can go and license ... I'm asking
 6 you. You're telling me it's a legal requirement. Under
 7 which law? You're telling me "We have to do the
 8 experiment, we have to do that". I'm asking a very
 9 simple question as a project licence holder: tell me
 10 about the law. You're telling me it's legally required
 11 tell me ...
 12 A. My legal requirements under the establishment licence
 13 holder is to breed animals -- under the Scientific
 14 Procedures Act to provide animals for development
 15 research. That's what my statement is describing.
 16 Q. Yes, so you're given a licence to breed animals?
 17 A. Yes, yes.
 18 Q. But on your statement here -- and maybe you're
 19 mistaken -- you said:
 20 "... it is a legal requirement that all potential
 21 new medicines intended for human use are tested in two
 22 species ..."
 23 I'm asking you for the law on that, please.
 24 A. It is a legal requirement and --
 25 Q. Stop, please. I know -- you keep saying. I'm asking

21

1 you for the specific. You are the project holder, you
 2 are the person who direct --
 3 MS BOLTON: Can we just be calm in the way we question
 4 a witness, please? My Lord, this witness has given
 5 evidence that it's her knowledge as a licence holder.
 6 She is not a lawyer. I do think that this isn't
 7 a question for this witness. All she is saying is, "My
 8 knowledge as a licence holder is this is what's
 9 required". That's expressly her evidence.
 10 MR JUSTICE NICKLIN: I know that and he's asking what the
 11 legal requirement she's referring to is.
 12 MS BOLTON: And she's answered him with reference to the
 13 piece of legislation. Mr Curtin saying, "Which
 14 section?", that's not for this witness. She's explained
 15 it.
 16 MR JUSTICE NICKLIN: Well, if she doesn't know what the
 17 section is, she can say so.
 18 MS BOLTON: My Lord, I simply flag that I think she's being
 19 asked something which is outside what she's giving
 20 evidence of. That's all.
 21 MR JUSTICE NICKLIN: No, no, that's not the ...
 22 Okay, so that we're clear about the parameters of
 23 asking questions, the cross-examination of a witness is
 24 not circumscribed by the parameters of the witness'
 25 evidence --

22

1 MS BOLTON: I appreciate that.
 2 MR JUSTICE NICKLIN: -- so Mr Curtin is entitled to probe
 3 that which arises from her statement. He is asking
 4 a question of whether Ms Pressick actually knows what
 5 the source of the legal requirement that she's referred
 6 to in the statement is. That is a legitimate question.
 7 MS BOLTON: My Lord, I will -- I simply say that that's the
 8 limits of I think what the witness is saying in her
 9 witness statement.
 10 MR JUSTICE NICKLIN: Well, then let -- I'm perfectly
 11 confident that Ms Pressick is able to speak for herself
 12 on that point.
 13 MS BOLTON: I'll sit down. Apologies, my Lord.
 14 MR JUSTICE NICKLIN: Right, Ms Pressick, let me help you if
 15 I can. In your statement you have said that there is
 16 "a legal requirement that all potential new medicines
 17 intended for human use are tested in two species of
 18 mammal before they are given to human volunteers in
 19 clinical trials". Mr Curtin's question is: do you know
 20 where that legal requirement comes from, to test
 21 medicines intended for human use on two species of
 22 mammal before they're given to human volunteers?
 23 A. The legal requirement comes from the Home Office. The
 24 detail of it, I wouldn't know all the depths of that
 25 licence.

23

1 MR JUSTICE NICKLIN: Right.
 2 MR CURTIN: I see that as woefully inadequate --
 3 MR JUSTICE NICKLIN: No, that's a comment, Mr Curtin. What
 4 you can't do is comment on the witness' answers. If you
 5 want to say something about what you say is
 6 Ms Pressick's inability to identify the legal
 7 requirement she's talked about, that's something you say
 8 in a speech to me later. You don't criticise the
 9 witness whilst she's in the witness box; all right?
 10 MR CURTIN: Okay, I was only doing it -- she is the project
 11 licence holder and she should know these things --
 12 that's all -- as a competent person.
 13 MR JUSTICE NICKLIN: Okay.
 14 MR CURTIN: Are you aware of section 5(c) of ASPA? It
 15 relates to special protection of animals. You should
 16 know this. Okay, I'll guide you. Dogs are classed
 17 as -- dogs, cats, horses and monkeys have special
 18 protection.
 19 A. Protection, yes.
 20 Q. Under that section, it gives dogs, which your company
 21 breeds, special protection in that experiments in this
 22 country cannot be done on a dog if another species is
 23 available. Are you aware of that?
 24 A. Yes, but to answer that clearly, that is again at the
 25 testing and the licence for testing. We are an animal

24

1 breeder, which our licence -- our establishment is
 2 licensed for; breeding --
 3 Q. I know that.
 4 A. -- and not for experimental.
 5 Q. But are you aware of section 5(c), that dogs have
 6 a special protection and dogs should not be used in this
 7 country if another species can be used? Are you aware
 8 of that?
 9 A. Yes.
 10 Q. You're aware of that, okay.
 11 You state in -- early on here, you have stated
 12 that -- I'll come to the position in a minute.
 13 Could you go to paragraph 87?
 14 A. Yes.
 15 Q. "Prior to late June 2021, I had not experienced any
 16 protests at the B&K Hull site, save for a minor protest
 17 at some point in 2013, which occurred in response to
 18 a planning application made by B&K to increase the size
 19 of the facilities ..."
 20 Do you see that?
 21 A. Yes.
 22 Q. May I show you the copies of the evidence I've submitted
 23 this morning?
 24 MS BOLTON: Well, can I see it as well, please? (Handed)
 25 MR CURTIN: They're just simply taken from the internet, BBC

1 news coverage of a whole series of demonstrations,
 2 including sometimes thousands of people, that took place
 3 in and around the Bantin & Kingman site because the
 4 Bantin & Kingman site was -- okay.
 5 MS BOLTON: Can we take the witness to the page because I'm
 6 not following this at the moment either.
 7 MR JUSTICE NICKLIN: Yes, Mr Curtin, you need to -- have you
 8 got a copy yourself, Mr Curtin?
 9 MR CURTIN: Yes.
 10 MR JUSTICE NICKLIN: So we're looking at the articles that
 11 you sent and they all have dates on.
 12 MR CURTIN: Yes.
 13 MR JUSTICE NICKLIN: So take the witness to the article that
 14 you want to ask questions about.
 15 MR CURTIN: Would you like to perhaps think about for
 16 a minute -- can I refresh your memory about something?
 17 Marshalls bought Bantin & Kingman, didn't they --
 18 Marshalls --
 19 A. Yes.
 20 Q. -- in 2009?
 21 A. Approximately, yes.
 22 Q. And their plan originally -- is this correct? -- was to
 23 turn the Bantin & Kingman site into a massive dog
 24 breeding site, a dog breeding -- I'd call it a "factory"
 25 but a large dog -- beagle breeding facility? That was

1 the plans?
 2 A. They put in an application for larger buildings.
 3 Q. A number of applications that went through a whole
 4 series -- you ended up in the High Court and a judicial
 5 review. I'm talking seven/eight years of high profile
 6 protests as evidenced in the BBC. I'd call that a bit
 7 more than a minor protest.
 8 MS BOLTON: We're being provided evidence about years worth
 9 of planning appeals. Where is it?
 10 MR CURTIN: The thousands -- I can ask the witness.
 11 MS BOLTON: No, the witness needs to be put to the documents
 12 that provide all of this. I'm sorry, but this is just
 13 an article talking about a protest.
 14 MR CURTIN: It is. Can I have a two-minute adjournment?
 15 MS BOLTON: My Lord, my point is, if we're going to put
 16 evidence in about seven planning appeals, judicial
 17 reviews, where is it, because just saying all of this
 18 happened isn't helpful.
 19 MR JUSTICE NICKLIN: Ms Bolton --
 20 MR CURTIN: Perhaps Ms Pressick can help us with her memory.
 21 MR JUSTICE NICKLIN: Let's just be clear. If I were doing
 22 the cross-examination, I could ask open questions
 23 about -- like Mr Curtin has said -- "You planned to
 24 increase the size of the facility. That was objected to
 25 by significant -- and you went through a series of

1 appeals, processes, it even ended up in judicial
 2 review". All those are perfectly legitimate questions.
 3 Mr Curtin's failure at the moment is he's not waiting
 4 for the answer --
 5 MR CURTIN: Sorry.
 6 MR JUSTICE NICKLIN: -- and it's when he needs to impeach an
 7 answer he gets that he needs to refer to the documents.
 8 If he were to get a series of answers "Yes" from the
 9 witness, he wouldn't need to refer to the documents.
 10 MS BOLTON: My Lord, I will sit down. I just think that,
 11 one, I'm not sure what this has to do with the case and,
 12 two, it seems to be asking the witness a number of
 13 questions based on and referencing a BBC article that
 14 doesn't say all of that.
 15 MR JUSTICE NICKLIN: Right.
 16 MS BOLTON: That's the point.
 17 MR JUSTICE NICKLIN: Okay.
 18 MS BOLTON: If it's referencing what Mr Curtin is raising,
 19 could he please take the witness --
 20 MR JUSTICE NICKLIN: What it's relevant to -- and Mr Curtin
 21 is doing it impeccably. He has taken the witness to the
 22 paragraph in her statement which he wants to ask
 23 questions about. So if you have a complaint about
 24 relevance, it's going to arise out of the witness' own
 25 evidence.

1 MS BOLTON: My Lord, I'm simply raising the point that the
 2 witness is being --- things are being put to the witness
 3 that don't appear to be in an article which we've only
 4 just been handed, which seems to be a BBC report about
 5 a protest and a petition and the witness is being asked
 6 questions about seven planning applications, which I'm
 7 sorry, it just isn't clear from the document.
 8 MR CURTIN: My Lord, would this perhaps be a break for the
 9 transcriber?
 10 MS BOLTON: I just make that point, my Lord. She needs an
 11 opportunity to read it because she's not seen it before.
 12 MR JUSTICE NICKLIN: Ms Bolton, I'm well aware of what the
 13 rules of cross-examination are and the important role
 14 I have in relation to when a litigant in person is
 15 conducting a cross-examination is he is certainly in no
 16 worse position than counsel would be in.
 17 Nobody is entitled, in the course of
 18 a cross-examination, conducted by an advocate, to stand
 19 up and say, "I demand that the witness be given an
 20 opportunity to read all of these documents". To an
 21 extent Mr Curtin is being put under a harsher regime
 22 than he would be if he were an advocate because he is
 23 entitled to ask the questions, which is, "You said there
 24 haven't been any demonstrations prior to June 2021
 25 ... " --- sorry --- "... some minor protest in 2013 which

1 occurred in response to a planning application by B&K".
 2 Well, Mr Curtin is entitled to probe that answer and he
 3 wants to address --- take her to --- I would think
 4 particularly 7 January 2012 would be the article that
 5 I think he would be homing in on.
 6 MS BOLTON: My Lord, my point is this is all information
 7 which, if it's being relied on in court, is usually
 8 provided before the day that the witnesses are called
 9 and it has not been, so it is actually important that
 10 the witness is taken to it because it's been provided
 11 today.
 12 MR JUSTICE NICKLIN: Witnesses up and down the country are
 13 provided with documents on cross-examination as to
 14 credit.
 15 MS BOLTON: My Lord, it's not appropriate in these
 16 proceedings for it to be dealt with in this way without
 17 the witness at least having an opportunity to read the
 18 article because this hasn't been in evidence until this
 19 morning. I mean, Mr Curtin just turned up and handed it
 20 up and said, "I'm relying on this". We haven't had
 21 a witness statement that deals with this.
 22 MR JUSTICE NICKLIN: No.
 23 MS BOLTON: It's not in his evidence, it's not in his
 24 defence and now it's being introduced and the witness
 25 does not even get a chance to cast her eye on what she's

1 being asked about. We've not seen it until now. It
 2 does seem to me that this is something which a witness
 3 should be allowed to read rather than multiple questions
 4 being put to her which --- she doesn't even know what it
 5 says. That's what I'm asking. If documents are handed
 6 this late, then people have to have a chance to look at
 7 them.
 8 MR JUSTICE NICKLIN: I don't think you're in any different
 9 position than any other counsel who is handed documents
 10 where a witness is being asked in cross-examination as
 11 to credit during the trial.
 12 MR CURTIN: Perhaps Ms Pressick has jogged her memory.
 13 "Thousands object to Grimston dog breeding ground [as
 14 read]."
 15 MR JUSTICE NICKLIN: No, Mr Curtin ---
 16 MS BOLTON: If there is a challenge to what is in this
 17 evidence, it ought to be provided to people in time for
 18 them to look at it.
 19 MR JUSTICE NICKLIN: That's not how cross-examination as to
 20 credit works.
 21 MS BOLTON: I don't think she should be being cross-examined
 22 as to credit, my Lord. She seems to have acknowledged
 23 there was a protest. It's not like she's denying that
 24 there has been a protest.
 25 MR CURTIN: She is.

1 MS BOLTON: No, she's not.
 2 MR CURTIN: She is. She said minor --- she's accepted there
 3 was a minor protest. I would say there was six years of
 4 non-stop protesting.
 5 MS BOLTON: That's very different to what this article says.
 6 MR CURTIN: High profile.
 7 MR JUSTICE NICKLIN: You're undermining his
 8 cross-examination now in front of the witness.
 9 MS BOLTON: I will sit down. I simply make the point that I
 10 do think this isn't a credit point and therefore the
 11 witness should have a chance to look at it. But I've
 12 made my submissions on it, my Lord.
 13 MR JUSTICE NICKLIN: No, what you've done is you've told me
 14 what you think about things. You haven't made any
 15 submissions about it. You've interrupted Mr Curtin's
 16 cross-examination. It's difficult enough for a litigant
 17 in person to do this.
 18 MS BOLTON: My Lord, I understand that, but it also has to
 19 be fair on the witness answering the questions. I do
 20 understand --- and all I was asking, that the witness is
 21 given a chance to look at what's being put to her.
 22 MR JUSTICE NICKLIN: We haven't even got that far yet.
 23 MS BOLTON: Well, she is being asked questions on it, so if
 24 she could have a chance to look at it ---
 25 MR JUSTICE NICKLIN: No, that's not how it works, Ms Bolton.

1 MS BOLTON: I will sit down. I apologise, but I do think
 2 the witness ought to be given an opportunity to see
 3 this. My Lord, I hear your Lordship. I won't push the
 4 point any further.
 5 MR JUSTICE NICKLIN: Mr Curtin, the purpose in
 6 cross-examination is I think -- the quarrel you have
 7 with Ms Pressick is that you say it's not a minor
 8 protest, it was a more significant protest.
 9 MR CURTIN: Yes.
 10 MR JUSTICE NICKLIN: Right. Do you want to try and put that
 11 to Ms Pressick and see what she says about that?
 12 MR CURTIN: Yes. Would you still like to -- listening to
 13 what you've heard, would you still like to stick to your
 14 statement here where you have a recollection of a minor
 15 protest as opposed to what I'm putting to you, six years
 16 of very high profile, the Government getting involved,
 17 the Government planning being involved? In fact it
 18 wasn't one -- let me ask you. Was there -- do you
 19 remember a succession of planning appeals? Do you
 20 remember putting a --
 21 MR JUSTICE NICKLIN: Mr Curtin --
 22 MR CURTIN: I am so sorry.
 23 MR JUSTICE NICKLIN: -- you have to allow the witness to
 24 provide an answer. Let me try and put the questions
 25 that I think you want to put.

1 MR CURTIN: Yes.
 2 MR JUSTICE NICKLIN: All right?
 3 Ms Pressick, what we're looking at is the extent of
 4 there being a dispute about the proposals from B&K to
 5 expand their facility. Now, Mr Curtin is suggesting to
 6 you that there was more than just a minor protest and
 7 that in fact it was a fairly significant and prolonged
 8 period of opposition to these proposals.
 9 A. This statement -- just to highlight, protest activity at
 10 B&K site, and my statement mentions I had not
 11 experienced any protest at the B&K site save a minor
 12 protest. That was actually at the site itself --
 13 MR JUSTICE NICKLIN: Right.
 14 A. -- and that's what I'm trying to highlight there.
 15 MR JUSTICE NICKLIN: Okay.
 16 MR CURTIN: Okay, good. So away from the site, there had
 17 been -- as a result of -- I put it to you, do you recall
 18 Bantin & Kingman putting in a planning application for
 19 a large beagle breeding -- I'd call it a "factory" --
 20 a site at the Bantin & Kingman site, after which there
 21 was a very high profile series of demonstrations?
 22 A. I was aware that there was planning application applied
 23 for and it escalated, but I was not involved in any of
 24 that process or at the time my role wasn't anywhere
 25 close to that. I was aware that there was some activity

1 in the higher courts for it.
 2 Q. Yes. Okay. I put it to you -- and there was -- do you
 3 recall a planning application being -- if you don't
 4 recall, you don't recall -- a planning application for
 5 an extremely large beagle breeding site which was turned
 6 down and then another planning application of a smaller
 7 scale? Have you any recollection of that?
 8 A. I wasn't close enough to it to answer.
 9 Q. Okay. So Marshalls take over Bantin & Kingman in around
 10 about 2009 and then immediately begin to make --
 11 immediately begin to make plans to turn the Bantin &
 12 Kingman site -- the original plan to turn the Bantin &
 13 Kingman site into a large beagle breeding facility --
 14 MR JUSTICE NICKLIN: Mr Curtin, we're now moving away from
 15 an area that's relevant to the issues that I have to
 16 decide; okay? The whys and wherefores about what the
 17 plans were for a larger facility, the extent to which it
 18 was subject to appeals and planning process is not
 19 relevant to the issues I have to decide.
 20 MR CURTIN: I understand, my Lord. It just goes to the
 21 history of the company. It would be my case that the
 22 plans that were rejected -- the idea of this American
 23 multi-national fell apart and in fact what we've got
 24 now, the site at MBR Acres, is the fulfillment of the
 25 Marshall plan to come to England.

1 MR JUSTICE NICKLIN: Okay. But my answer to that is, "And
 2 so what?". In relation to the litigation -- the issues
 3 that I have to decide in this case, even if that were
 4 right, it can't make obstructing traffic into the
 5 facility at the Wyton site lawful. It just doesn't have
 6 any bearings, Mr Curtin. I've told you at the beginning
 7 of the trial, you don't need to, as it were, establish
 8 that your opposition to what goes on at the Wyton site
 9 is well founded. You don't have to do that. The
 10 claimants are not challenging that. They understand the
 11 basis on which you protest against their activities.
 12 They do not say that your beliefs are not well founded.
 13 So you do not need to establish the reasons why you feel
 14 that you should protest against their activities, so
 15 none of this is relevant.
 16 MR CURTIN: All right. As the project licence holder and as
 17 someone who speaks with authority on behalf of
 18 MBR Acres, because part of the -- let me challenge you
 19 on this. You say -- maybe counsel here could help me.
 20 You suspect that the demonstration may come to you one
 21 day, do you understand? I'm paraphrasing one of your
 22 paragraphs here, where -- the reason you've added
 23 Bantin & Kingman on to the injunction is that you feel
 24 that the protest may spread to your site?
 25 A. It's in my witness statement.

1 Q. It's the whole -- why is Bantin & Kingman on this
 2 injunction? Why is Bantin & Kingman here on this
 3 injunction?
 4 A. Can I refer to a section of that?
 5 Q. Yes.
 6 A. So ... sorry, I'm not sure where it is in my statement,
 7 but regarding to the B&K site, it had a protest last
 8 year -- the year before, sorry, it's had subsequent
 9 calls and disruption to the admin.
 10 Q. But there is no --
 11 MS BOLTON: If it helps Mr Curtin, it's paragraphs 85 to
 12 101.
 13 A. Thank you. Paragraph 65?
 14 MR JUSTICE NICKLIN: 85.
 15 A. 85, sorry.
 16 MR JUSTICE NICKLIN: It's 86. That's where -- what you're
 17 asking about, Mr Curtin.
 18 MR CURTIN: Yes.
 19 A. So a protest, some disruption of calls and some contact
 20 referencing the social media to the B&K site.
 21 Q. Are animals, as we speak today, bred on the B&K site?
 22 A. Animals are bred on the B&K site.
 23 Q. Are beagles bred?
 24 A. No.
 25 Q. So even though the Bantin & Kingman site is involved

1 with breeding animals, you're absolutely not involved
 2 with breeding beagles?
 3 A. Not at that site.
 4 Q. Okay. How many times do you visit the site? As project
 5 holder, how many times have you visited the site, for
 6 example, this year?
 7 A. This year, most weeks.
 8 MR JUSTICE NICKLIN: Are you talking about the Wyton site?
 9 MR CURTIN: Sorry, yes, the Wyton site. Most weeks?
 10 A. Hmm.
 11 Q. So you know the site well?
 12 A. Yes, yes.
 13 Q. Would the witness be able to show -- would I be able to
 14 show the undercover footage to the witness and she could
 15 establish if this is a -- she would confirm if this is
 16 taken from the Wyton site that I've -- I think it's
 17 exhibit E. If she was able to confirm that these were
 18 dogs and --
 19 MR JUSTICE NICKLIN: Yes, you can ask that question, but I'm
 20 just concerned how we're going to play it. Who has the
 21 facilities?
 22 MS BOLTON: It's on Opus, my Lord.
 23 MR JUSTICE NICKLIN: Okay. Can we do that?
 24 MS BOLTON: We don't know where it is, though. It's
 25 Mr Curtin's evidence. It's not numbered into the

1 witness evidence. It only came yesterday.
 2 MR JUSTICE NICKLIN: Well, let's try it a different way,
 3 Mr Curtin.
 4 Ms Pressick, you are aware I think, as you've been
 5 here -- have you seen the footage that Mr Curtin
 6 provided? It's got a series of extracts, some of it
 7 there's a bit of drone footage, there's a bit of
 8 footage -- and the allegation or the suspicion is
 9 that -- I think Mr Curtin confirmed as much -- he'd
 10 taken it by essentially using a fishing rod to insert
 11 a small camera through a vent at the facility. Have you
 12 seen that video footage?
 13 A. I've seen some footage, yes.
 14 MR JUSTICE NICKLIN: Are you able to recognise it as being
 15 from MBR Acres?
 16 MS BOLTON: My Lord, Ms Pressick hasn't seen this footage.
 17 MR JUSTICE NICKLIN: Okay.
 18 MR CURTIN: What about the Daily Mirror --
 19 MR JUSTICE NICKLIN: No, one thing at a time, please,
 20 Mr Curtin; okay? Do we have the footage or not?
 21 MS BOLTON: My Lord, I think someone is trying to find it,
 22 but I do question the relevance of this to the case
 23 again.
 24 MR JUSTICE NICKLIN: Okay.
 25 MS BOLTON: Mr Curtin -- well, I don't want to put words

1 into his mouth (inaudible) challenge.
 2 MR JUSTICE NICKLIN: No, I think he's just seeking
 3 confirmation. If you're telling me that you're not
 4 going to challenge that it is the footage from the
 5 inside of the facility --
 6 MS BOLTON: I think that's why I was asking my Lord was it
 7 by the camera pole, in which case it was likely and
 8 Mr Curtin has confirmed it is --
 9 MR JUSTICE NICKLIN: Yes.
 10 MS BOLTON: -- so I don't think we need to --
 11 MR JUSTICE NICKLIN: So that's not being challenged?
 12 MS BOLTON: We know that the inside was filmed. That's why
 13 I was asking.
 14 MR JUSTICE NICKLIN: Right. That's not being challenged,
 15 Mr Curtin, so you don't need to ask Ms Pressick about
 16 that because it's not being disputed that -- that part
 17 of the footage, which shows the dogs inside the
 18 facility, is not being challenged as part of the -- it's
 19 not being said that that's not what you say it is.
 20 MR CURTIN: Okay. It's just -- it's the state of what you
 21 see the dogs in, it's the filth that I would ask -- is
 22 she satisfied as a project holder --
 23 MR JUSTICE NICKLIN: Right, that's not a relevant question
 24 because I'm not deciding -- it's not my job to decide
 25 whether MBR Acres is in any way, for example, breaching

1 its licence, not caring for the dogs properly. That's
 2 not my responsibility and it's not an issue in these
 3 proceedings. I appreciate that you very much feel that
 4 they are not being kept properly. I understand those --
 5 and that's what gives rise to what is the basis of your
 6 protest activities, which I repeat again is not being
 7 challenged. The sincerity of your belief is not being
 8 challenged by the claimants so that's not a relevant
 9 matter for me to engage upon in this litigation.
 10 MR CURTIN: Okay, and I don't want to stretch the point.
 11 Can I ask about the working hours? The fact that --
 12 is it relevant that the dogs are left alone from
 13 11.00 am on a Saturday as a project licence holder?
 14 MR JUSTICE NICKLIN: No.
 15 MR CURTIN: Okay.
 16 All right. Let's go to the documents you were shown
 17 about the importation of dogs from America.
 18 MR JUSTICE NICKLIN: The schedule? This (Indicates)?
 19 MR CURTIN: Yes. Do you accept -- because it's redacted --
 20 the document is redacted. In fact the name of the
 21 company involved on the left-hand side is redacted, but
 22 next to that there's a zip code. I would suggest to you
 23 that's a zip code of -- do you accept that that's
 24 Marshall? Does that seem familiar to you? I'm asking
 25 a lot. I'm sorry for this. I do apologise to you.

41

1 Are you aware that Marshalls import dogs into this
 2 country? Were you aware before being shown today?
 3 A. There's always been some supply from the US to the UK.
 4 Q. Some supply. And you talked of not -- the reason it's
 5 done, because maybe there's a shortfall into a certain
 6 type of dog. What types of -- as far as I know,
 7 Marshall breed the Marshall beagle.
 8 A. Yes.
 9 Q. So which other type of dog do you breed?
 10 A. We haven't other dogs --
 11 Q. So there's no other dogs. Which shortfall do you refer
 12 to?
 13 A. For the UK market, it's the Marshall beagle.
 14 Q. Well, you have a place called "MBR Acres" with up to --
 15 a capacity of up to 2,000 dogs; yes?
 16 A. It's a capacity that could do that, yes -- can do that.
 17 MR JUSTICE NICKLIN: So just let me try to clarify. If
 18 there is a need for further beagles to supply those who
 19 are carrying out medical research and you need further
 20 supplies of that, then sometimes they will be imported
 21 from the US?
 22 A. Yes, yes.
 23 MR CURTIN: Okay. Let me paraphrase it this way. To me
 24 it's as if you spoke in terms of Marshall providing
 25 a public service. To me, that's how it -- I put it to

42

1 you that Marshalls is a business; yes?
 2 A. Yes, it is a business.
 3 Q. It's an American business and its business is to breed
 4 beagles to laboratories.
 5 A. Hmm.
 6 Q. It's in its interest to sell as many beagles all over
 7 the world as possible?
 8 A. It's to meet the customer demand.
 9 MR JUSTICE NICKLIN: Right.
 10 MR CURTIN: Well, any business would say that.
 11 A. But it's not to meet, as you're describing, as many as
 12 we can do.
 13 Q. Why not? You don't want to breed an excess, you want to
 14 breed as many as you can sell. You want to sell beagles
 15 to laboratories; yes? And Marshall, you have a centre
 16 in China; yes? Come on.
 17 MS BOLTON: What's the relevance of this?
 18 MR JUSTICE NICKLIN: Ms Bolton, I think the relevance is
 19 that it's part of your case that if MBR Acres is put out
 20 of business, then it would be impossible to carry out
 21 meaningful medical research in this country because
 22 there is no other provider.
 23 MS BOLTON: Yes.
 24 MR JUSTICE NICKLIN: Mr Curtin is exploring that in fact
 25 there are -- not only are beagles imported now, but that

43

1 therefore it's not right to say that there are no other
 2 suppliers. He is doing quite a good job of
 3 establishing -- if you leave aside the question of
 4 numbers. I've got that from Ms Pressick's evidence --
 5 he says that if MBR -- if, as it were, the domestic
 6 production stopped, the American market would not be
 7 able to supply the numbers. But that's the relevance of
 8 the evidence.
 9 MS BOLTON: The question, "It's in your interest to breed as
 10 many dogs as you can", isn't a point. That's not --
 11 MR JUSTICE NICKLIN: Okay, Ms Bolton, it is going to take
 12 a very long time. I cannot, with a litigant in person,
 13 police with the vigilance I might an advocate's
 14 questions the precise relevance of what he's going to
 15 ask because sometimes it only becomes apparent what
 16 point he's trying to make when it's gone a little
 17 further. Where I am satisfied the evidence is
 18 irrelevant, I have stopped him.
 19 MS BOLTON: My Lord --
 20 MR JUSTICE NICKLIN: I don't see that he is ... He is
 21 perfectly entitled to say that MBR Acres are
 22 a commercial operation and their business is to supply
 23 beagles for medical research, and I think if we --
 24 MS BOLTON: My Lord, I'm sorry.
 25 MR CURTIN: Marshalls have -- is it correct that Marshalls

44

1 have centres in China?
 2 A. Yes, they have.
 3 Q. In France?
 4 A. Yes.
 5 Q. And we've established that Marshalls bought Bantin —
 6 Marshalls came — would it be correct that Marshalls
 7 came to set up in the UK as part of their global
 8 operation?
 9 A. Yes.
 10 Q. Do you have a centre in Italy?
 11 A. No. Not — no.
 12 Q. Did you used to have a centre in Italy?
 13 A. Many years ago.
 14 Q. How many? Not that many. 2015?
 15 A. Possibly. I can't remember the year, but yes, it was
 16 quite a few years ago.
 17 Q. Why is there not an MBR facility —
 18 MR JUSTICE NICKLIN: No, that's not going to be relevant.
 19 It's fair enough for you to ask questions about the
 20 extent to which the larger corporation has facilities,
 21 current facilities, that could supply beagles. Where
 22 you're heading at the moment, because I know what you've
 23 sent me, isn't going to be relevant —
 24 MR CURTIN: Okay.
 25 MR JUSTICE NICKLIN: — because they don't have a facility

45

1 in Italy anymore.
 2 MR CURTIN: Can I try and ask one more question about Italy
 3 and you can refuse it?
 4 Are you aware of criminal prosecutions of MBR senior
 5 management, the European senior — have you got any
 6 knowledge at all of the MBR senior management being
 7 imprisoned in Italy for running a dog breeding facility?
 8 A. I haven't got the information to answer any questions on
 9 that.
 10 Q. That's not what I asked. Have you got any memory at all
 11 of what — do you understand what I'm referring to? I'm
 12 putting to you that MBR management have been imprisoned,
 13 the European manager. Have you got any recollection at
 14 all of that?
 15 A. No, not close.
 16 MR JUSTICE NICKLIN: She's got no recollection.
 17 MR CURTIN: Can I pursue that?
 18 MR JUSTICE NICKLIN: No, because it's not relevant.
 19 MR CURTIN: I'd say that — I'd have gone for perjury there.
 20 She cannot forget a senior member of her company going
 21 to prison. That's what she's saying. She's got ...
 22 MR JUSTICE NICKLIN: It's an entirely different — well,
 23 you've got to remember that operations — Ms Pressick is
 24 in charge or has been in charge of the UK operation.
 25 She's not answerable for what happens in other divisions

46

1 of Marshalls.
 2 MR CURTIN: Okay. Can I ask you about your pyramid of
 3 authority? Do you have a European manager? Because
 4 you're owned by an American company, do you have
 5 a European manager that you're responsible to?
 6 A. We have directors in Europe.
 7 Q. Pardon?
 8 A. We have directors.
 9 Q. Is there a European manager of — well, you work for
 10 Bantin & Kingman. You don't know —
 11 MS BOLTON: Paragraph 43 of the witness statement.
 12 MR CURTIN: Pardon?
 13 MS BOLTON: It's in paragraph 43. It's all there.
 14 My Lord, it may be a good time for Mr Curtin to look
 15 at that. We need an Opus break, so it might give him
 16 a moment, because that's where the company structure and
 17 who is in charge of what is explained.
 18 MR JUSTICE NICKLIN: Mr Curtin, don't underestimate that
 19 I have read the Italian court judgment that you sent me,
 20 I understand why you have referred to it, but it falls
 21 into the same category that I dealt with before, which
 22 is you don't need to satisfy me or the court of the
 23 reasons why you feel driven to protest about MBR Acres;
 24 okay? You don't need to — that's not an issue in this
 25 case —

47

1 MR CURTIN: Okay.
 2 MR JUSTICE NICKLIN: — and nobody is saying that you don't
 3 have well-founded reasons for your protest. You don't
 4 need to establish those and it's not fair to ask
 5 Ms Pressick about things that she's not responsible for.
 6 MR CURTIN: Okay. I just find it hard to believe that she'd
 7 forgotten about a very senior management — when she was
 8 at the company.
 9 MR JUSTICE NICKLIN: Right, Mr Curtin, we're not going to
 10 deal with it; all right?
 11 MR CURTIN: Yes.
 12 MR JUSTICE NICKLIN: We're going to take our break. You
 13 need to concentrate in relation to Ms Pressick's
 14 allegations about you. You did a careful job in your
 15 witness statement of what you wanted to challenge in
 16 relation to various things that were being alleged
 17 against you. It's upon that that you need to
 18 concentrate.
 19 MR CURTIN: Thank you.
 20 MR JUSTICE NICKLIN: All right? We're going to have our
 21 break now.
 22 MS BOLTON: My Lord, just to flag, I did say to Mr Curtin
 23 this morning that if at any point he needs five minutes
 24 to read part of the statement to have a think and
 25 regroup, he should just signal that to your Lordship and

48

1 that that will be given.
 2 MR JUSTICE NICKLIN: Absolutely. Cross—examination doesn't
 3 have to be an ordeal, Mr Curtin. If you need time to
 4 regroup your thoughts, just let me know; all right?
 5 MR CURTIN: Okay, thank you.
 6 MR JUSTICE NICKLIN: We're going to have our break now.
 7 We're going to come back at 12.05. But remember what
 8 I've said about what the parameters of this litigation
 9 are about and the questions you need to ask; all right?
 10 MR CURTIN: Could I ask — I don't mind — for some
 11 guidance, just in the 15 minutes' break so I can apply
 12 my mind, not of you as my solicitor but as the judge.
 13 MR JUSTICE NICKLIN: Yes.
 14 MR CURTIN: Ms Pressick refers to a lot of the video
 15 evidence but she wasn't there. She's got — in my
 16 witness statement there's lots of challenge and various
 17 interpretations.
 18 MR JUSTICE NICKLIN: Correct.
 19 MR CURTIN: So this is my chance with Ms Pressick, but also
 20 I get two chances, with Ms Pressick and the witnesses?
 21 MR JUSTICE NICKLIN: Correct. It would be possible for you
 22 to say to Ms Pressick the point you've just made to me,
 23 which is, "You weren't present when these incidents took
 24 place so your only knowledge of them is through having
 25 watched the video ..." —

1 MR CURTIN: Yes.
 2 MR JUSTICE NICKLIN: — "..." and therefore it's just your
 3 impression of what I'm doing".
 4 MR CURTIN: Yes.
 5 MR JUSTICE NICKLIN: "If I were to say that I didn't do
 6 that, you wouldn't disagree with that?".
 7 MR CURTIN: Yes.
 8 MR JUSTICE NICKLIN: Questions like that. So you can say
 9 that it's just her view in essence, having watched the
 10 videos; all right?
 11 MR CURTIN: Yes, thank you.
 12 MR JUSTICE NICKLIN: But you've adopted the right approach
 13 in your witness statement because you set out what it is
 14 that's alleged against you and then you set out what you
 15 say in answer to it. Cross—examination of Ms Pressick,
 16 you may not need to do it for all of them, you can
 17 choose a few examples and say to Ms Pressick, "You say
 18 I did this. I say I didn't do that. What I did was
 19 this. Would you disagree with that, Ms Pressick?", and
 20 you'll see what answer she gives. That's legitimate
 21 cross—examination on those points. So I would follow
 22 the job you've already done in analysing that which you
 23 want to challenge; all right?
 24 MR CURTIN: Yes, thank you.
 25 MR JUSTICE NICKLIN: Right, okay.

1 (11.51 am)
 2 (A short break)
 3 (12.08 pm)
 4 MR JUSTICE NICKLIN: Right. Yes, Mr Curtin.
 5 MR CURTIN: Can I refer you to paragraph 137 of your
 6 20th statement? It's a section at the top of the page,
 7 "D11 — John Curtin". Can I summarise it? Basically
 8 you describe Mr John Curtin as a protester, really, that
 9 does things that protesters do, shouting, holding
 10 banners. Would that be an accurate description of Mr —
 11 a typical protester in fact?
 12 A. In terms of —
 13 Q. In terms of my activities outside of MBR Acres, I put it
 14 to you that my actions are that of a — what you would
 15 be accustomed to in protesting. Shouting?
 16 A. Shouting, yes.
 17 Q. Holding up banners?
 18 A. Hmm—hmm.
 19 Q. So my actions are that of a typical protester. There's
 20 nothing that makes me stand out compared to other
 21 protesters that you've seen on the videos?
 22 A. Not in all instances.
 23 Q. Could you expand on that?
 24 A. Well, I think we'd — could we go to some more
 25 reference, please?

1 Q. Okay, what about we go to paragraph 255? No, no, sorry,
 2 252.
 3 Before I ask you questions about 252, if I could
 4 briefly refer back to the previous section where you
 5 generalise Mr Curtin — sorry — but you talk of some
 6 previous involvement I've had. You're aware of —
 7 you're aware that my involvement with animal rights goes
 8 back — is this microphone on?
 9 MR JUSTICE NICKLIN: It doesn't work. It only records; it
 10 doesn't amplify. The microphone you need to worry about
 11 is the one with the little green—
 12 MR CURTIN: Sorry to go back, could we quickly go back to
 13 where I've just referred to now?
 14 MS BOLTON: 252.
 15 MR JUSTICE NICKLIN: Mr Curtin, what do you want, the
 16 section you were referring to before?
 17 MR CURTIN: I want to go to the ...
 18 MR JUSTICE NICKLIN: Page 485.
 19 MR CURTIN: I'm sorry, page 485. I'll have to stop saying
 20 "sorry". Yes, the D11 section.
 21 MR JUSTICE NICKLIN: That's right, page 485.
 22 MR CURTIN: I've got a different ...
 23 MR JUSTICE NICKLIN: Oh, I'm in a different bundle, right.
 24 It's paragraph 137.
 25 Mr Curtin, what's important when you're

1 cross—examining a witness is you've got to get an answer
 2 from the witness. Your thoughts are running ahead with
 3 you and you're putting points but you're not necessarily
 4 getting an answer. You're making sensible submissions
 5 and points, but you've got to get the answer from the
 6 witness.
 7 MR CURTIN: Yes.
 8 MR JUSTICE NICKLIN: Just from what I know you've asked, let
 9 me try and capture this. So what Mr Curtin was asking
 10 you essentially is: is there anything, so far as you're
 11 concerned, that marks him out as a protester that's
 12 anything other than the normal protester protesting
 13 outside MBR Acres?
 14 A. As the group, he's no different, no.
 15 MR CURTIN: What was the answer?
 16 MR JUSTICE NICKLIN: As the group, the group of protesters,
 17 you're no different.
 18 MR CURTIN: Okay, but on paragraph 138, you do refer to
 19 you've got some knowledge of my past.
 20 A. Yes.
 21 Q. What's that based on?
 22 A. History, information from public source and the site
 23 itself prior to Marshalls owning that site.
 24 Q. So is this stuff you've picked up in the canteen or
 25 stuff you've been told, you've read? I just want to

53

1 know your previous knowledge of me. You talk about my
 2 past and I just want to know what you base that on.
 3 A. As with all activities, it's in the public domain.
 4 Q. Okay. So have you researched me? These people in the
 5 courtroom, they don't know anything about me.
 6 A. Only by looking at past knowledge and information on the
 7 web.
 8 MR JUSTICE NICKLIN: And that's research you've carried out?
 9 A. Yes, some, yes.
 10 MR CURTIN: Yes, I've actually been involved — do you know
 11 how long I've been involved?
 12 A. No, sorry, not exactly.
 13 Q. Let's take you to 252. Before we deal with it
 14 specifically, there's perhaps hundreds of incidences
 15 here which you've spoken about which have been captured
 16 on video; yes? Not forgetting about 252, but 252, 255,
 17 274 —
 18 MR JUSTICE NICKLIN: Generally in your witness statement
 19 you've recounted a lot of incidents.
 20 A. Yes, yes.
 21 MR CURTIN: Would I be correct in that most, if not all, of
 22 the incidents you weren't present? I'm going to bring
 23 you to a specific incident now —
 24 MR JUSTICE NICKLIN: Mr Curtin, you haven't got the answer
 25 again.

54

1 MR CURTIN: Sorry, I apologise.
 2 MR JUSTICE NICKLIN: Ms Pressick, would it be fair to say
 3 that your knowledge of what has taken place is
 4 largely — and you'll tell me if it's not exclusively —
 5 based upon you watching videos?
 6 A. Yes, it is.
 7 MR CURTIN: For example, paragraph 252 —
 8 MR JUSTICE NICKLIN: Wait a minute. Why have we taken the
 9 microphone away?
 10 THE CLERK OF THE COURT: Ms Jaffray is getting loads of
 11 feedback. I don't know if it's from her end.
 12 MR JUSTICE NICKLIN: Well, if we take the microphone away,
 13 she's not going to hear anything at all.
 14 THE CLERK OF THE COURT: There's another microphone there.
 15 MR JUSTICE NICKLIN: Oh, I see. Right. Okay.
 16 MR CURTIN: 252, 13 September 2021. Do you remember being
 17 present that day or is your recollection purely from the
 18 video?
 19 A. The video.
 20 Q. Video 294. Have you watched that video?
 21 A. Yes, I've watched most videos.
 22 Q. You quote me as saying — and I don't dispute this.
 23 I can be heard — "The idea is to stand here and hold
 24 them back". So you've put that in your statement; yes?
 25 You've heard that on the video so that's why it's in

55

1 your statement?
 2 A. Yes.
 3 Q. I put it to you that you might have cherry-picked that
 4 sentence because you haven't — is there any reason why
 5 you didn't put in the preceding sentence or the
 6 following sentence? Okay, that's the question.
 7 A. The main sentence in these videos are statements
 8 critical to me understanding the situation at the time.
 9 Q. Because if you were to listen — we could watch the
 10 video if you want, if you didn't believe me, but
 11 prior to that I address a group of people and I actually
 12 say, "Because of the injunction, because of the police
 13 ... " —
 14 MS BOLTON: We have the video, my Lord. I think —
 15 MR CURTIN: Could we watch —
 16 MR JUSTICE NICKLIN: But if Ms Pressick agrees with
 17 Mr Curtin that that's what he said, we don't need to
 18 watch the video.
 19 MR CURTIN: I think it might be useful to watch the video
 20 because I doubt whether she remembers it. Can we watch
 21 the video? I draw your attention to the preceding
 22 sentences before and after.
 23 MR JUSTICE NICKLIN: Okay. Before we do that, because
 24 I have a feeling that we may have to listen to this more
 25 than once, put the words that you say we can hear to the

56

1 witness so that we all know what we're listening for.
 2 MR CURTIN: Okay. We've got some sort of idea of the time.
 3 I put it to you that -- and I think your evidence is
 4 done in such a way to --
 5 MR JUSTICE NICKLIN: No, Mr Curtin, just the words.
 6 MR CURTIN: Listen out for the words. "For all those who
 7 are here, who perhaps it might be your first time,
 8 because of the police, because of an injunction, our
 9 idea is to hold them back", and then the bit you haven't
 10 put is, "and keep moving and when they get to the road
 11 they'll get off". So I put it to you that what's going
 12 on there is myself as a senior, very experienced
 13 protester, I am putting to a crowd of people who haven't
 14 been -- some of the people who haven't been there
 15 before -- I'm accepting we're going to slow the vehicle
 16 and then once it gets to the road -- so I'm accepting
 17 there's going to be some obstruction. So let's go to
 18 watch the video, which is very different because we're
 19 going to --
 20 MR JUSTICE NICKLIN: Okay, now we'll watch the video; all
 21 right?
 22 MR CURTIN: Okay, thank you.
 23 (Video played)
 24 May I help the court as we're going along?
 25 MR JUSTICE NICKLIN: No. Are any of us going to be able to

1 hear this?
 2 Right.
 3 Is there more? I thought it had reached the end of
 4 the ...
 5 MS BOLTON: No, I don't think we have. The screen has gone
 6 now.
 7 MR JUSTICE NICKLIN: Okay. Do we need to see more?
 8 MS BOLTON: It goes on for longer, my Lord.
 9 MR JUSTICE NICKLIN: I'm sure it does.
 10 MS BOLTON: It may be relevant to the context of what
 11 Ms Pressick is being challenged on so I think the
 12 witness should see it.
 13 MR JUSTICE NICKLIN: Right. Mr Curtin, now, on the basis
 14 we've seen the video, what do you want to put to
 15 Ms Pressick on the basis of what we've just watched?
 16 MR CURTIN: I would ask you to accept -- it would be -- what
 17 you've seen there is me obstructing vehicles but not
 18 blocking them, allowing passage, facilitating a peaceful
 19 protest, a protest where the vehicles are kept -- do you
 20 accept that's not me endeavouring to block the vehicles
 21 to keep them inside? There's seems to be an express --
 22 I put it to you that I'm facilitating in fact the moving
 23 of the vehicles. Would you agree with that?
 24 A. Not fully because that is blocking the access out of
 25 site. That situation is a concern for staff to leave

1 site, and when we describe that there's items and
 2 there's people across, including Mr Curtin -- across
 3 that access.
 4 Q. It's not ideal. It's just that throughout your
 5 statement you often refer to me as blocking the
 6 vehicles. I put it to you that there is no evidence at
 7 all, apart from an incident described in paragraph 255
 8 where an Anglia Water -- a van was held up. I put it to
 9 you there's no evidence of me in your entire witness
 10 statement, with the exclusion of 255, of Mr Curtin ever
 11 blocking a vehicle, impeding, obstructing, but always
 12 with the idea, in the case of Mr Curtin, of allowing
 13 free passage of vehicles. Would you accept that?
 14 A. I wouldn't say it was free passage. I don't describe
 15 that as free passage.
 16 Q. Okay, but are you able to refer anywhere in the
 17 documents to Mr Curtin actually blocking the vehicle, as
 18 in it cannot either enter or leave the premises?
 19 A. I understand you say they can move but not easily.
 20 Q. Okay. Good.
 21 As far as the rest of your video evidence in
 22 relation to me, there are a lot of references to me but
 23 they're based on you watching the video and it's your
 24 opinion. You're not an eye witness in these events,
 25 you're just shown the videos and make --

1 A. No, that's what I said. I observed the videos in most
 2 instances.
 3 Q. Okay. Now, you say you've been there -- what did you
 4 say? I asked you how many times you'd been a project
 5 licence holder to the MBR Acres site, to the Wyton site,
 6 and your answer was ...?
 7 A. Being -- not the project licence, the establishment
 8 licence holder.
 9 Q. Establishment, sorry.
 10 A. Yes, it's two years -- it's when Jane Read was -- fell
 11 (inaudible -- overspeaking).
 12 Q. I've talked about this year. You've already answered
 13 it. To remind you, I think you said you've been there
 14 nearly every week, you said.
 15 MR JUSTICE NICKLIN: That's a different point, visiting the
 16 site. She goes most weeks, she said.
 17 MR CURTIN: I now want to know about visiting the site. You
 18 go most weeks. Are you sure about that?
 19 A. Oh, yes, absolutely.
 20 Q. So you've been shouted at then? Well, have you been
 21 shouted at?
 22 A. Yes.
 23 Q. And what has been shouted at you?
 24 A. The instances of the puppy killer and scum.
 25 Q. Have you made a statement anywhere about things that

1 were shouted at you and how it made you feel? Because
 2 you've been shouted at, is there any evidence in here
 3 about any feelings that you've had about that?
 4 A. In my witness statement, at the end I refer to -- give
 5 me a minute just to check -- it's my overall view for
 6 the staff as well, not my direct view.
 7 MR JUSTICE NICKLIN: Right.
 8 MR CURTIN: Okay. So in your many, many visits -- it must
 9 be many, it must be -- Camp Beagle has been going for
 10 nearly two years -- so if you've been going every week,
 11 that's like ... you've been in and out of the site while
 12 Camp Beagle has been there many times; yes?
 13 A. Yes.
 14 Q. Have you been shouted at whilst you drive in and you
 15 drive out?
 16 A. Collectively driving in and out, yes.
 17 Q. Have you been shouted at? What does "collectively"
 18 mean?
 19 A. When we access and leave site, as your group, you shout
 20 and --
 21 MR JUSTICE NICKLIN: Is it meaning that you --
 22 A. For me directly.
 23 MR JUSTICE NICKLIN: Conventionally, is it that you are in
 24 a vehicle with others or do you drive --
 25 A. No, I usually drive on my own.

61

1 MR JUSTICE NICKLIN: You drive on your own, right.
 2 MR CURTIN: When someone shouts at you, do you take it
 3 collectively? Do you see people shouting at you?
 4 You're the project licence holder. Do people know you?
 5 Do you think you get treated as a ...?
 6 MR JUSTICE NICKLIN: I think Mr Curtin is asking do you feel
 7 that you are being targeted personally or that you are
 8 being targeted because you are going to and from
 9 MBR Acres?
 10 A. I get targeted as the group, not as the licence holder.
 11 MR CURTIN: And could you give an example of what you've
 12 actually heard -- forget about the video -- what you've
 13 heard you yourself being called, collectively? You
 14 don't take -- what is the collective group -- even
 15 sometimes you're going on your own -- oh, I'm so sorry.
 16 Forget that. What has been shouted at you that you
 17 recall?
 18 A. On separate incidences not relating to that video, but
 19 going on and off site, is "killer", "puppy killer",
 20 "murderer".
 21 Q. You've heard it on that video, "puppy killer". And how
 22 does it make you feel to be called a puppy killer?
 23 A. It's really awful. It's not nice at all.
 24 Q. Not nice.
 25 A. No.

62

1 Q. But you understand why people say that? Do you have any
 2 understanding why someone would call you a puppy -- or
 3 anyone that works in MBR, this collective, would you
 4 understand?
 5 A. I don't understand why we're being called "puppy
 6 killers".
 7 Q. Okay. Because you breed animals for vivisection --
 8 yes? -- to be experimented on.
 9 A. We breed animals for research.
 10 Q. You've got a project licence for bleeding. Animals are
 11 also bled there, aren't they? Is it correct that you've
 12 got a bleeding licence for the MBR --
 13 A. We've got a project licence for taking blood.
 14 Q. And on site, at Wyton, are dogs bled and sometimes bled
 15 to death?
 16 A. That's not the correct description.
 17 Q. What is the correct description of the terminal bleeding
 18 procedures?
 19 MS BOLTON: Can I ask why this is relevant to the case?
 20 MR JUSTICE NICKLIN: Well, it arises out of the answer that
 21 Ms Pressick gave, which is why she doesn't understand
 22 why they're called "puppy killers".
 23 MS BOLTON: Yes, but that's not a question to her.
 24 MR JUSTICE NICKLIN: Well, it's --
 25 MS BOLTON: That's a submission for Mr Curtin or his own

63

1 evidence, but it's not a question to her on her
 2 evidence.
 3 MR CURTIN: It is now.
 4 MR JUSTICE NICKLIN: Could you step outside court for
 5 a moment, please, Ms Pressick, so that I can just --
 6 just literally, it will be two or three minutes.
 7 A. Yes.
 8 (The witness withdrew)
 9 MR JUSTICE NICKLIN: Mr Curtin is exploring the impact of
 10 the protest on Ms Pressick personally.
 11 MS BOLTON: My Lord, I understand that.
 12 MR JUSTICE NICKLIN: And his purpose, as I understand it, is
 13 that he's trying to make the point and trying to get the
 14 witness to agree that she understands that the target of
 15 the protest is not Ms Pressick personally but the
 16 organisation that she works for.
 17 MS BOLTON: But she's accepted that, my Lord.
 18 MR JUSTICE NICKLIN: Yes, but what he's -- the question he
 19 was asking was, because he wants -- he's trying to
 20 extract the answer, which is that dogs do die -- I don't
 21 know whether it's right or not -- dogs do die at the ...
 22 Now, if they do, then Ms Pressick's apparent refusal or
 23 reluctance to accept that there's a basis for calling
 24 "puppy killers" is relevant to how it impacts her
 25 potentially.

64

1 MS BOLTON: My Lord, unless Mr Curtin is putting to
 2 Ms Pressick that she kills dogs ---
 3 MR JUSTICE NICKLIN: No, that's not the point.
 4 MS BOLTON: My Lord, my concern is that what's really going
 5 on here is investigation into licences MBR has, and what
 6 that means, what this means, isn't relevant to ... she's
 7 accepted to Mr Curtin ---
 8 MR JUSTICE NICKLIN: Okay. Can I propose that we deal with
 9 it in this way because it is a lot easier for me to deal
 10 with the question of what relevance the answers have
 11 afterwards. If we do it in the currency of the witness'
 12 evidence, either you do Mr Curtin a real disservice
 13 because, if I had to have this discussion in front of
 14 the witness, you would have successfully deactivated any
 15 possibility that he was going to extract the answer that
 16 he wanted ---
 17 MS BOLTON: My Lord, I've been very careful to make sure
 18 that I'm not saying anything about that but simply
 19 asking about the relevance. I'm certainly not wanting
 20 to do that but at the same time I am conscious that
 21 Mr Curtin has made it very clear that what he really
 22 wants to put on trial here is MBR, what he really wants
 23 to do ---
 24 MR JUSTICE NICKLIN: No, he is struggling as a litigant
 25 would do in these circumstances to understand the

65

1 parameters of relevance. I am doing the best to explain
 2 to him what is relevant. He is likely to transgress on
 3 occasions throughout this trial because he has his own
 4 beliefs about this that he feels strongly about and he
 5 feels that his protest activities are trying to be
 6 curtailed by the litigation. You say they're not, but
 7 that's how he feels.
 8 MS BOLTON: My Lord, I accept that. I just ask the court to
 9 bear in mind that it must be of relevance, especially
 10 when he's asking about the company's operations because
 11 that's the company's business, unless it's relevant to
 12 this case, and so ---
 13 MR JUSTICE NICKLIN: Okay. Well, if I had to adopt a zero
 14 tolerance approach to relevance and had you getting up
 15 every time that Mr Curtin asked a question, this trial
 16 will last until the end of July.
 17 MS BOLTON: I accept that, my Lord, and I don't intend to do
 18 that. I simply am concerned that we do stay to
 19 relevance to a degree because it is ---
 20 MR JUSTICE NICKLIN: Put your faith, Ms Bolton, in the fact
 21 that I understand the parameters of this litigation.
 22 I ultimately will control the questions that Mr Curtin
 23 asks. I have to ask you, please, to refrain from
 24 interrupting unless there is something of real prejudice
 25 that is going to emerge. If it's merely to say that

66

1 this is not relevant, then trust me that I will
 2 understand that some of the questions Mr Curtin asks are
 3 of limited relevance but I want to see where it's going.
 4 Ultimately, if it goes nowhere and it turns out to be
 5 irrelevant, I will ignore the evidence that is obtained
 6 by it. But it takes longer for us to do this process if
 7 you object on the basis of relevance than it will be if
 8 we just sit quietly, let Mr Curtin ask the questions,
 9 let me control whether he's straying too far off the
 10 path, and we will try and get through the evidence.
 11 MS BOLTON: My Lord, I accept that. I would just flag now
 12 that I'm conscious that we have a number of witnesses
 13 who are quite fragile and who are quite affected by
 14 things and, again, I just think --- I'm concerned if we
 15 move too far, that that's going to become a theme and
 16 that's going to be very hard on them. That's all
 17 I flag. My Lord, I hear your Lordship. I won't pursue
 18 these points. I'll leave it to your Lordship.
 19 MR JUSTICE NICKLIN: Mr Curtin doesn't strike me as an
 20 unintelligent man. I think he can understand where he
 21 hits up against the guide rails, as it were, and I don't
 22 suppose he will repeat the errors, such as they are, as
 23 we move forward during the trial. If he does, then I'll
 24 have to correct them again.
 25 MS BOLTON: No, and, my Lord, I think Mr Curtin will

67

1 probably acknowledge, when he's raised to me paragraphs
 2 he wants to take, I've fairly explained to him how he
 3 should take the witnesses to them. I'm not trying to
 4 impede that at all. I just also want to ensure that the
 5 witness isn't being --- questions being put to them that
 6 really they shouldn't be, that aren't relevant, and that
 7 was all, but I hear your Lordship.
 8 MR JUSTICE NICKLIN: Ultimately, that's my job.
 9 MS BOLTON: My Lord, indeed.
 10 MR JUSTICE NICKLIN: Right. Let's get the witness back,
 11 please.
 12 Mr Curtin, I'm just going to ask a couple of
 13 questions to try to establish the answer that I think
 14 you're trying to get.
 15 (The witness returned)
 16 MR CURTIN: Thank you.
 17 MR JUSTICE NICKLIN: Ms Pressick, are there occasions ---
 18 when you are carrying out the taking of the blood
 19 samples from the dogs, are there occasions in which,
 20 whether that's unintended, the dogs die as a result of
 21 that?
 22 A. No, it's not unintended. It's under procedure,
 23 properly.
 24 MR JUSTICE NICKLIN: Right. Do sometimes dogs die as
 25 a result of that?

68

1 A. No.
 2 MR JUSTICE NICKLIN: No?
 3 A. No.
 4 MR JUSTICE NICKLIN: Right. So they don't die.
 5 MR CURTIN: You have a bleeding licence, yes, MBR ---
 6 A. We have a licence, yes.
 7 Q. Are you telling the court --- and you're under oath and
 8 I haven't got the information --- that there are no
 9 procedures of terminal bleeding, under anaesthesia, in
 10 the bleeding room of MBR Acres? Think about it.
 11 A. It's called --- as I said then, it's terminal bleeding
 12 but it's under procedure, so a dog could be bled but not
 13 come around again. But that is not just on purpose,
 14 it's managed and it's because of the specific dog that
 15 we would do that. So it's under the schedule --- we have
 16 a schedule of dogs, so it's not purposely ---
 17 MR JUSTICE NICKLIN: Okay. Can I just put it as neutrally
 18 as I can, then, that dogs do die at the facility?
 19 A. Hmm.
 20 MR JUSTICE NICKLIN: Right. So I think Mr Curtin's point is
 21 that, when the protesters shout "puppy killers", that's
 22 an emotive description, obviously, but it is born of
 23 their belief that the death of the dogs is something
 24 that ought not to happen.
 25 A. Hmm, okay.

1 MR JUSTICE NICKLIN: Would you accept that?
 2 A. It's not that it ought not to happen, it's ---
 3 MR JUSTICE NICKLIN: Sorry, I'm not making myself clear.
 4 That's my fault. I'm asking you to think of it from the
 5 position of the protesters who are shouting "puppy
 6 killers".
 7 A. Yes.
 8 MR JUSTICE NICKLIN: The reason that they shout that is
 9 because they are protesting about the deaths of the dogs
 10 at the facility ---
 11 A. And it shouldn't happen?
 12 MR JUSTICE NICKLIN: Yes.
 13 A. Okay.
 14 MR JUSTICE NICKLIN: Would you accept that that's --- you
 15 appreciate that's why they ---
 16 A. I understand that more, yes.
 17 MR JUSTICE NICKLIN: I think, in fairness to you, your
 18 objection to the word "puppy killers", it makes it sound
 19 as if you're doing it deliberately ---
 20 A. Yes.
 21 MR JUSTICE NICKLIN: --- in a way that that's not what ---
 22 that's not a reflection of what takes place?
 23 A. What we do, yes. Yes.
 24 MR CURTIN: Okay, I won't go on. I've got one question
 25 about the bleeding, so --- but before I take that, so in

1 a terminal --- let me go back to that. In the terminal
 2 bleeding procedure, it's not the purpose of the dog to
 3 die?
 4 A. A terminal procedure is terminal.
 5 Q. Okay. We could be here --- okay. Thank you for that.
 6 So just to establish, why are the dogs bled? I put
 7 it to you it's part of Marshall's business to sell dogs'
 8 blood; is this correct? This is why it's done?
 9 A. Yes, because quite often, if blood is required, we don't
 10 always terminally bleed. We take blood as you would
 11 a person ---
 12 MR JUSTICE NICKLIN: Yes.
 13 A. --- so it's saving, on the other hand, a dog's life.
 14 MR CURTIN: Seeing as we're here, so you don't always ---
 15 when would you decide ---
 16 MR JUSTICE NICKLIN: No, Mr Curtin.
 17 MR CURTIN: Okay.
 18 One small other question on the "puppy killer". The
 19 Marshall dog is famous throughout the vivisection
 20 community. It's well known, isn't it?
 21 A. Hmm.
 22 Q. How long has the Marshall beagle been in existence?
 23 A. 80 years almost.
 24 Q. 80 years. So in this 80 years --- I'll put it to you
 25 that the Marshall beagle, more than most other dogs,

1 because of the concentration of this particular breed,
 2 would you accept that it's actually --- after decades and
 3 decades of breeding from this very narrow stock, it's an
 4 interbred dog that has more than its shares of genetic
 5 abnormality?
 6 MR JUSTICE NICKLIN: Mr Curtin, this is now well outside ---
 7 MR CURTIN: It was more the "puppy killers" that put it in
 8 relevance to ---
 9 MR JUSTICE NICKLIN: It's about --- insofar --- the reason
 10 I've allowed those questions is because it's
 11 a legitimate issue in the case, the impact of your
 12 protesting activities on the employees of MBR Acres,
 13 including Ms Pressick. So you've explored that issue.
 14 You've got the answers you've got.
 15 MR CURTIN: Okay. Good.
 16 So, Susan Pressick, you are the establishment
 17 licence holder ---
 18 A. Yes.
 19 Q. --- but yet --- but you've been called a "puppy killer" ---
 20 you've recalled being called a "puppy killer" as you
 21 went in, but you didn't take it personally as such?
 22 A. It's just not pleasant. It's just not a pleasant
 23 experience having to be shouted at in that way, with
 24 those words.
 25 Q. Do you take it personally or do you take it, "They're

1 calling me that because I work in here"? Which one?
 2 A. You take it personally because we do everything we can
 3 do correctly. We do things correctly, so (inaudible —
 4 overspeaking).
 5 Q. Have you ever been specifically pointed out, "That's the
 6 puppy killer", as such?
 7 A. No, as I described before, it's all of us, when we're
 8 moving around on and off site.
 9 Q. And in a form of legitimate protest, can you have any
 10 understanding at all — forget the fact that it's
 11 unpleasant for you — of why that would be a legitimate
 12 thing for a protester to shout outside of a very
 13 controversial beagle breeding establishment?
 14 A. I can understand the peaceful protest and the need for
 15 emotion to explain what the protesters are saying. It's
 16 still difficult to accept being shouted at.
 17 Q. Okay. Forgive me, you do make mention of the drone.
 18 Could you help me there? Ms Pressick refers to an
 19 incident where I'm seen to be flying a drone on
 20 Facebook.
 21 MS BOLTON: The drones incident concerning Mr Curtin starts
 22 at paragraph 321 and 328 — sorry, and 333.
 23 MR CURTIN: That relates to an incident where — it's on
 24 Facebook. It's where I'm seen flying the drone on
 25 Facebook; yes?

1 A. It refers to — 321 and — hearing that he flies the
 2 drone. "Further, when a drone was lost on the Wyton
 3 Site", that paragraph refers to that.
 4 Q. I don't contest the fact that I do fly the drone but
 5 it's part of this injunction hearing that, by me flying
 6 the drone, it damages — well, it doesn't damage your
 7 company because your company is Bantin & Kingman, but it
 8 damages your parent company, therefore it damages
 9 MBR Acres. Tell me why the drone, which is ever — tell
 10 me why you are seeking or why you complain that —
 11 what's your problem with the drone?
 12 A. The drone is relating to MBR Acres' site and it flies
 13 several times — a few times and it flies to a P—air(?)
 14 and it follows and looks at the site location, the
 15 buildings and the movement of people.
 16 Q. And what's wrong with that?
 17 A. We're a commercial licensed regulated business. It
 18 encroaches on our day-to-day normal activities —
 19 Q. How?
 20 A. — and I find that difficult to see that environment is
 21 encroached with a drone.
 22 Q. For example — when you say "encroached", can you give
 23 me an example?
 24 A. By flying the drone at heights, various heights — I'm
 25 not privileged to all the heights — but it actually

1 flies above the buildings, persons working, contractors
 2 working, our daily activity .
 3 Q. Why does that encroach your — you're a licence holder.
 4 What you do is within the law. Why does that encroach?
 5 A. Because it steps into our property and our perimeter of
 6 our business.
 7 Q. Is it correct that your business is surrounded by barbed
 8 wire? You've got a lot of security to keep people out,
 9 put it that way; do you accept that? The Wyton site is
 10 surrounded with security measures to keep people out?
 11 A. Security was increased following the large activity of
 12 the protesters in July/August 2021.
 13 Q. And before that? Before that? I just want to make the
 14 point that you do everything — you don't — okay.
 15 I ask you again. Tell me one example — and you might
 16 not like it — when you say "encroach on your business
 17 activities", give me one single example of any part of
 18 your business that's not been done, for example, because
 19 of the drone. Are you aware of a single ...?
 20 A. Free movement of suppliers, fixing, mending buildings.
 21 Q. Could you give me an example of — what do you mean?
 22 They look up?
 23 A. I can't refer to evidence that — maybe — I can't
 24 remember — but there are instances where the suppliers
 25 are fixing a new window and the drone was above them,

1 watching them do that work. The staff have to keep
 2 facial covered up because that is worrying to be on the
 3 media and that's very difficult to work with.
 4 Q. Okay. So, yes, staff covering their faces is a form of
 5 encroachment?
 6 A. Hmm.
 7 Q. But there's no actual — are you aware of a single day
 8 when something couldn't be done because of drones
 9 flying?
 10 A. Not couldn't be done but done very difficultly and
 11 interrupts our normal flow of the day.
 12 Q. I'm not understanding. Which — because a drone is
 13 there, what would be done differently if a drone wasn't
 14 there? Give me an example.
 15 A. Well, the staff walking to and from site locations, they
 16 have to cover — they have to be aware, be alert, of the
 17 drone, for example.
 18 Q. Okay. Is that it?
 19 A. No, there's the transfer for suppliers coming on site
 20 with feed, bedding, putting into warehouse location.
 21 Q. And you have to turn people away, suppliers, because of
 22 the drone? Have you ever had to tell — you're not the
 23 manager of the site, are you? In your statement, you're
 24 the site manager for B&K.
 25 A. Yes, I am.

1 Q. So are you aware of a single aspect of business -- apart
 2 from the workers choosing to cover their faces because
 3 they don't want to be identified, could you tell me one
 4 single incident where MBR Acres had to not do something
 5 because a drone was flying?
 6 A. The drones, when they're flying, is interrupting with
 7 the transfer of the animals as well.
 8 Q. Could we expand on that?
 9 A. Yes. So, for example, we move the dogs in the carts and
 10 to keep the dogs relaxed and -- we put them in the truck
 11 in the crates, which is interrupting the dogs'
 12 environment as well as our environment.
 13 MR JUSTICE NICKLIN: So just to be clear, what have you been
 14 required to do differently because you're worried about
 15 the drones? Do you transport them in a different way?
 16 A. Yes.
 17 MR JUSTICE NICKLIN: Just describe to me what changes you've
 18 made.
 19 A. So we would probably take a group of dogs and put them
 20 in an open cart and move them along to another building
 21 or another location. That's purely just transferring
 22 dogs. By the drone and the interruption, we choose to
 23 put them now and move them with our small van instead.
 24 MR JUSTICE NICKLIN: Okay.
 25 A. And again that's just -- one, it's welfare for the dogs,

1 so they're less anxious, and also we cover up our dogs
 2 like that.
 3 MR CURTIN: I completely 100% refute what you've just said.
 4 I put it to you you've just made that up on the spot.
 5 A. No, because it's clear in the ... we have dogs being
 6 moved in crates and then we change to moving dogs in
 7 vans -- in our van.
 8 Q. What if we were to adjourn now, if I could, and I could
 9 show you dogs moved in trolleys in the past month?
 10 A. I think in instances you can, but we still do move dogs
 11 with our van as well.
 12 Q. I agree. I've seen that too. I would put it to you
 13 that's in a real minority of cases and it tends to be
 14 when there's more dogs. I put it to you that you've
 15 made that up -- I challenge you absolutely that the
 16 reason that you're not able to carry the dogs around in
 17 trolleys anymore and you use a van, it's simply not
 18 true. It's not true. And I would put it to you that
 19 because you're not the manager of the site -- I don't
 20 know if you -- you're not making this up, are you, about
 21 the van and "We don't use the trolley anymore" because
 22 I'm telling you it's not true.
 23 A. I am not -- sorry, I'm not making that up.
 24 Q. So it's your case -- when did this begin? When did it
 25 begin -- okay. You're a high responsibility in

1 Bantin & Kingman -- you're telling the court you've got
 2 high responsibility. When was the executive decision
 3 taken, "We will not transport the dogs in trolleys
 4 anymore and we have to use vans"? I'd love to know the
 5 date of that or any recollection you have of this to the
 6 court.
 7 A. Because I work closely with the site and the staff
 8 there, they explain to me, in the past as well, that the
 9 concern for moving the dogs, they would be easily moved
 10 in the van. If there's an odd dog or a case where they
 11 take a dog, yes, maybe the crate, but that is when
 12 normally the drone is not flying.
 13 MR JUSTICE NICKLIN: Can I just ask, the reason for moving
 14 them in the car rather than the crate, is that because
 15 the drone annoys the dogs or irritates them in any way?
 16 A. It's very distracting and disturbing for the dogs, yes.
 17 Yes, of course it depends on the height of the drone and
 18 when I say --
 19 MR JUSTICE NICKLIN: Have you ever seen the drone when
 20 you've been at the facility?
 21 A. Yes, yes.
 22 MR JUSTICE NICKLIN: Right. At what height -- it's
 23 difficult to estimate but --
 24 A. Well, it's above building height. It's higher than
 25 building height.

1 MR JUSTICE NICKLIN: Higher than the building?
 2 A. Our buildings are single level, but they're still
 3 reasonably high -- in instances where you step back into
 4 the building because you're coming to appear on the
 5 drone footage.
 6 MR JUSTICE NICKLIN: Can I ask this question, which is: the
 7 objection that you take to the drone flying is more
 8 because it's recording -- you know it's recording what's
 9 taking place --
 10 A. Yes.
 11 MR JUSTICE NICKLIN: -- rather than it being an irritation
 12 or a danger or anything like that. It's the concept of
 13 being monitored?
 14 A. It's the monitoring.
 15 MR JUSTICE NICKLIN: Right.
 16 MR CURTIN: I'd say it is the monitoring. You don't want to
 17 be monitored. Do you feel like no one should -- why
 18 should anyone monitor you? No one has got any right to
 19 monitor you?
 20 A. No.
 21 MR JUSTICE NICKLIN: I don't think that's a fair question,
 22 Mr Curtin.
 23 MR CURTIN: Do you understand why some people would see it
 24 correctly that your company is being monitored?
 25 A. I don't understand why we need to be closely monitored

1 like that. I find it difficult to understand why it's
 2 so close.
 3 MR JUSTICE NICKLIN: I think Mr Curtin's point is it's
 4 closely aligned to the idea that the company has been
 5 the target of protest activity so there are a group of
 6 people who are very interested in the activities because
 7 they are fundamentally opposed to it. So I think
 8 Mr Curtin's point is that that's the reason that they
 9 want to monitor is because of -- it's all linked to and
 10 rooted in the protest. Would that be a fair summary?
 11 A. Yes, it's what they feel they need to do, yes.
 12 MR CURTIN: And I go back to the -- I really want to go to
 13 this point. So what responsibility do you have at
 14 MBR Acres in relation to, for example, moving the dogs
 15 around the site. What responsibility do you have? You
 16 may have heard a story about they're now using a van.
 17 Is it your responsibility for how the dogs are moved
 18 around the site, in a van or a truck?
 19 A. It is my responsibility but it's ultimately the staff's
 20 responsibility, all our responsibility (overspeaking --
 21 inaudible).
 22 Q. You're telling the court, because of the drone, there
 23 was a decision made at one point, "We will not transport
 24 in trolleys anymore. Because of the drone we will have
 25 to use the van". Is this the case you're making?

1 A. We would make the decision to make sure it's safe.
 2 Q. When? When? I really need to tie it down because I'm
 3 putting to you that you're actually making this up.
 4 MR JUSTICE NICKLIN: No, Mr Curtin, just get the -- the date
 5 is important.
 6 MR CURTIN: Sorry.
 7 MR JUSTICE NICKLIN: Get the date as best as Ms Pressick can
 8 remember it. The rest of what you want to say is for
 9 later in the trial; all right? Can you remember?
 10 A. It would be a year ago, at least.
 11 MR CURTIN: So a year ago an important managerial decision
 12 was taken with you involved where they've -- because of
 13 the drone, "We will not move the dogs around in trolleys
 14 anymore because it's too invasive. The dogs get scared
 15 by the drone. We'll now use a van". A year ago that
 16 decision was taken and you were part of that decision;
 17 yes?
 18 A. Approximately a year ago. It depended on the situation
 19 assessed at the time as well.
 20 MR CURTIN: Okay.
 21 MR JUSTICE NICKLIN: I think in fairness to Ms Pressick,
 22 because I think you may be at risk of making this
 23 a bigger point than it is, because Ms Pressick, I think
 24 her evidence -- we can look back at the transcript, but
 25 I think her evidence was they would still move the dogs

1 in crates as they were already used to doing if they
 2 were satisfied that there was no drone around or
 3 something like that. Is that it?
 4 A. Yes, exactly.
 5 MR CURTIN: Okay. I would put it to you -- I live there.
 6 You may travel once a week, I live there and I do fly
 7 the drone, and throughout the whole of this year, let
 8 alone last year, I've never -- I have not noticed the
 9 pattern that you're talking about. In fact -- well,
 10 I personally have taken many, many, many, many hours of
 11 footage in the past three months, let alone in the past
 12 year, of dogs in trolleys. I put it to you that the
 13 mechanism you're talking about isn't in operation at
 14 MBR. You may think it is but it's not. The dogs
 15 routinely get moved in trolleys whether the drone is up
 16 or not. I put it to you that --
 17 MR JUSTICE NICKLIN: Mr Curtin, you need the answers; all
 18 right?
 19 Mr Curtin is saying that he's at the site regularly,
 20 has flown the drone and he has many hours of footage of
 21 dogs being moved in crates. Do you accept that that may
 22 be correct or is correct or that you're not aware of the
 23 precise operation so you couldn't comment on --
 24 A. I'm not fully aware but I'm aware that both they use the
 25 van and the trolley.

1 MR JUSTICE NICKLIN: Okay.
 2 MR CURTIN: They do use the van and the trolley, but you
 3 said because of the drone there was a decision taken --
 4 MR JUSTICE NICKLIN: Okay, Mr Curtin, we've got that on the
 5 transcript. What you want to make of the evidence is
 6 a matter for later in the trial -- all right? -- and
 7 it's lunchtime now.
 8 MR CURTIN: I've got just a few more.
 9 MR JUSTICE NICKLIN: Well, we're going to have to come back
 10 anyway because the rule is that Ms Bolton -- well, first
 11 of all Ms Jaffray needs to ask any questions she wants
 12 to ask and then the convention is that Ms Bolton gets
 13 the opportunity to ask any further questions that she's
 14 got, so we can't finish before lunchtime; all right?
 15 MR CURTIN: Just to help the court, I've got three to four
 16 more questions and no new areas to explore --
 17 MR JUSTICE NICKLIN: Right. Okay.
 18 MR CURTIN: -- so we can hopefully have Ms Pressick ...
 19 MR JUSTICE NICKLIN: All right. Good. Ms Pressick, over
 20 lunchtime -- I may have given you this warning before
 21 but it's a warning to all witnesses. It's nothing
 22 personal to you -- please don't discuss your evidence
 23 with anybody. It's just important that there's no
 24 suggestion that you're in any way influenced, so it's
 25 more to protect you; all right?

1 A. All right.
 2 MR JUSTICE NICKLIN: So just enjoy your lunchtime and I'll
 3 see you at 2 o'clock.
 4 (1.04 pm)
 5 (The short adjournment)
 6 (2.01 pm)
 7 MR JUSTICE NICKLIN: Right, Mr Curtin, yes.
 8 MR CURTIN: Yes, Ms Pressick, a couple more things. I don't
 9 think there's anything new. I just have a list of
 10 things that I want to confirm. You've talked of the
 11 reason why Marshall is importing dogs into this country,
 12 because of a shortfall of a certain type of dog; yes?
 13 A. Hmm—hmm.
 14 Q. And I spoke to you earlier about there is the Marshall
 15 beagle. Are you aware that there's another laboratory
 16 beagle — another breeder? You've mentioned them
 17 already, Envigo.
 18 A. Envigo, yes.
 19 Q. So there's the Marshall beagle. What possible
 20 shortcoming could there be in this country with
 21 MBR Acres' functioning? Is it because — Envigo was
 22 shut down in the US. Do you know that?
 23 A. Yes.
 24 Q. Do you know why it was shut down?
 25 A. Violation found in the US at that —

1 Q. Pardon?
 2 A. Violation in that facility at the US.
 3 Q. So animal — yes, violations. Animal welfare
 4 violations?
 5 A. I don't know the full detail. I just know it's the US
 6 and it was violation.
 7 Q. Do you have any memory of the judge intervening and the
 8 whole 4,000 dogs liberated —
 9 MR JUSTICE NICKLIN: Okay, Mr Curtin, we're going off piste
 10 again now.
 11 MR CURTIN: Are you aware that Marshalls have violations in
 12 America? Are you aware?
 13 A. Of US? Not fully aware of the US.
 14 Q. Even though your boss — if I was to put it to you there
 15 had been 18 violations, would you ...?
 16 A. The companies and the countries are separate for me.
 17 MR JUSTICE NICKLIN: Yes, don't worry about it, Ms Pressick.
 18 It's not relevant, Mr Curtin.
 19 MR CURTIN: Good. The reason why the dogs are being
 20 imported from Marshalls, is it because of just a pure
 21 number — you talked of shortcomings in a special type
 22 of dog. Are you aware of another type of dog that
 23 laboratories ask for?
 24 A. It's not the special type of dog. It's the beagle dog
 25 that we breed that are required by the customer that may

1 produce a shortfall to meet that specification. It's
 2 not the type of dog.
 3 Q. Okay. So MBR Acres, are you oversubscribed? What
 4 is it?
 5 A. It can be either because the amount we've got to supply
 6 to customers or the group of dogs is not readily
 7 available for that requirement by the study.
 8 Q. Because we see from the FOI(?) there's numbers of dogs,
 9 isn't there? Does it make any sense if — people do
 10 order them in batch — do the customers order them in
 11 batches of dogs to fulfil tests? 32?
 12 A. Normally groups of dogs are requested.
 13 Q. We talked before about the welfare. I believe the next
 14 witness is going to talk about the welfare problems if
 15 MBR Acres was shut down. But you're — as things exist
 16 at the minute, you're shipping dogs into this country
 17 for commercial reasons; yes?
 18 A. A small group, small amount.
 19 Q. Good. Are you aware — you've talked about my past as
 20 being someone who has been involved for a long time,
 21 you've seen me on the megaphone facilitating demos.
 22 Are you aware of any contact that I, Mr Curtin, had with
 23 the police liaison? If there was trouble at the camp or
 24 something, do you have any awareness at all, if you've
 25 got such a close contact with MBR Acres, that a go—to

1 person for the protesters for the police would be
 2 Mr Curtin?
 3 A. That's privileged between the police and ourselves —
 4 sorry, with the police and yourselves.
 5 MR JUSTICE NICKLIN: You don't know?
 6 A. We don't have that information. I don't know.
 7 MR JUSTICE NICKLIN: In your discussions with the police,
 8 have they ever mentioned that they go to Mr Curtin?
 9 A. No, not to me.
 10 MR CURTIN: And just to confirm that your understanding of
 11 paragraph 35 — when you write that, "it is a legal
 12 requirement that all potential new medicines intended
 13 for human use are tested in two species of mammal", all
 14 those legal requirements, that goes under the ASPA
 15 regulations; yes?
 16 A. That goes under the licence request application.
 17 Q. We talked about the legal requirement, and that is
 18 covered by ASPA —
 19 A. Some —
 20 Q. — so you're still saying it's a legal requirement that
 21 these —
 22 MR JUSTICE NICKLIN: Mr Curtin, we covered this. You're at
 23 cross—purposes because Ms Pressick is saying two things
 24 in that paragraph, as I recall. The first is the
 25 licensing arrangements under which MBR Acres operate and

1 then there are the separate legal requirements as to
 2 what is required by way of animal testing.
 3 MR CURTIN: Yes, exactly. The legal requirements and the
 4 only (inaudible — overspeaking) it's all covered by
 5 ASPA.
 6 MR JUSTICE NICKLIN: We dealt with that this morning.
 7 MR CURTIN: So the legal requirement to ...
 8 I think one more question for you. So you talked
 9 about extra security costs and that came in — I think
 10 I interrupted you. I think you were talking about the
 11 animal rebellion when people came in and — some people
 12 would say "stole", some people would say "liberated" —
 13 beagles.
 14 MR JUSTICE NICKLIN: No, in fact her evidence was that it
 15 was back in 2021. In the summer of 2021, when the
 16 protests began, they increased their security. That's
 17 the evidence that Ms Pressick gave.
 18 MR CURTIN: Okay. Are you aware of a spike in security
 19 since the — are you aware of the animal rebellion?
 20 They came on two occasions, they broke in and they've
 21 taken dogs from the site?
 22 A. I'm aware of the break-ins. The security question, we
 23 increased it because the protester activity got very
 24 high and —
 25 Q. But — no, no, no, protesters have always been there.

89

1 What do you mean "very high"? I want you to specify
 2 what you mean. Taken in, breaking in and taking dogs —
 3 MR JUSTICE NICKLIN: You've got to ask — the important
 4 thing about asking questions, you have to give a short
 5 direct question and then you have to let the witness
 6 answer; okay?
 7 Now, Ms Pressick, you were explaining to us that
 8 you'd increased your level of security because of the
 9 protester activity in I think June/July 2021. You were
 10 just explaining that to me.
 11 A. Yes. So we increased it because of the number of
 12 protests on protest days as well and we reviewed it
 13 ongoing since then, and at a certain point in the last
 14 year we introduced security with a dog on a weekend and
 15 since then it's changed.
 16 MR JUSTICE NICKLIN: Right. Now, Mr Curtin, if you want to
 17 ask about whether there was any increase in the security
 18 following the break-ins, then that's the question you
 19 ask next.
 20 MR CURTIN: Yes.
 21 Was there a marked increase of security after people
 22 actually, let's say, broke into the site? For example
 23 the dogs — the addition of the dogs, was it a direct
 24 result of the animal rebellion actions?
 25 A. It was both. It was the situation ongoing and the first

90

1 break-in.
 2 Q. I put it to you that immediately after the animal
 3 rebellion was the first time that overnight dog patrols
 4 were used; is that correct?
 5 A. Possibly, yes.
 6 MR CURTIN: Possibly, yes. Good. I think that's all the
 7 questions I have.
 8 MR JUSTICE NICKLIN: All right. Thank you very much.
 9 Right, Ms Jaffray, it's your opportunity now to ask
 10 Ms Pressick any questions that you have.
 11 MS JAFFRAY: Okay. I shouldn't have too many.
 12 Cross-examination by MS JAFFRAY
 13 MS JAFFRAY: So I just want to refer to point 105.5.
 14 There's a referral to assaults on staff.
 15 MR JUSTICE NICKLIN: Sorry, 105.5?
 16 MS JAFFRAY: Yes.
 17 MR JUSTICE NICKLIN: Right. Ms Pressick is just getting
 18 that witness statement ready.
 19 MS JAFFRAY: Sure. It's page 30.
 20 MR JUSTICE NICKLIN: Yes, page 30 of the witness statement,
 21 the internal pagination. Right, so it's:
 22 "Assaults on staff accessing and exiting the Wyton
 23 Site and their cars being hit."
 24 What was the question you wanted to ask?
 25 MS JAFFRAY: What are the assaults on staff that have been

91

1 done? I'm not aware of any assaults that have happened
 2 on staff.
 3 A. The reference to that is that — the banners, the
 4 placards, items being thrown at their cars and being
 5 hit.
 6 Q. I'm not aware of any items being thrown at cars either
 7 because the police would have dealt with that at the
 8 time.
 9 A. The police would deal with that.
 10 Q. Okay, so there's been no assaults on staff, it's been
 11 protesting out the front; is that what you mean?
 12 MR JUSTICE NICKLIN: Well, I think let's just clarify what
 13 you mean by "assault". "Assault" can mean different
 14 things. In common usage it means striking somebody
 15 physically. Is that what you're referring to?
 16 A. No, I'm referring to assault by approaching and hitting
 17 with the cars — the banners.
 18 MR JUSTICE NICKLIN: It's about hitting the cars.
 19 MS JAFFRAY: Right. Hitting the cars, not the staff, okay.
 20 So the convoy system, that was set up in June 2021,
 21 that's no longer necessary, so why do you feel that's no
 22 longer necessary now?
 23 A. There's still not as strong a convoy but they still
 24 travel between a set time and in a set group.
 25 Q. So although I haven't been there recently myself, from

92

1 what I've heard, staff arrive at all different times
 2 now, not necessarily in a convoy as such anymore, so it
 3 seems that the risk, alleged risk to the staff, has
 4 absolutely decreased.
 5 A. It's much calmer due to the injunction in place, but the
 6 calmness is still managed by the staff travelling
 7 between 7.30/8.00 am and leaving at 4.00 pm, so they
 8 still are travelling, although in separate cars, in
 9 a group.
 10 MR JUSTICE NICKLIN: Right.
 11 MS JAFFRAY: Okay. So even though some staff members leave
 12 at 5.30 and 6 o'clock now?
 13 A. Probably security do that. Security --
 14 Q. No, members of staff.
 15 A. It may be occasionally where a car leaves just before
 16 the security leave.
 17 Q. Okay, Mr Curtin might be able to give more information
 18 on that than myself. I haven't been there for quite
 19 a while.
 20 Okay. So are you aware that the police no longer
 21 facilitate the vans taking the dogs out of the site?
 22 A. I'm aware there isn't the higher police presence at the
 23 site when the vans leave or come on to site.
 24 Q. Okay, so the police presence decreased from -- I'm sure
 25 you saw it in the media -- an absolutely absurd amount

93

1 of police the first few occasions -- decreased down to
 2 a few riot vans, decreased right down to a police car,
 3 then there was just a couple of police and now there are
 4 no police.
 5 A. Yes, that's true.
 6 Q. Right. Okay. I'll come back to that. I'm not sure
 7 what it was.
 8 So you refer to a situation when there were dog
 9 crates placed at the gates by protesters. Are you aware
 10 of what happened that day and why protesters felt the
 11 need to do that?
 12 A. I do remember -- I'd have to refresh -- that dog crates
 13 were collected and -- do you mean positioned at the
 14 front of the gate, the blockade?
 15 Q. Yes, the blockade, yes.
 16 A. I don't --
 17 Q. Do you remember why -- sorry.
 18 A. I don't know why that action was taken, but ...
 19 Q. Okay, so that happened on one occasion, and that was
 20 when there were significant concerns about the welfare
 21 of dogs being put in staff members' cars and the police
 22 facilitated that between the protesters and the staff
 23 members, to get that sorted out. So that only happened
 24 on the one occasion.
 25 Okay. So with reference to the drone, staff members

94

1 can still be seen from the perimeter fence, so why is
 2 there an issue with them being seen from the drone when
 3 they can actually be seen anyway by people just down the
 4 side of the facility?
 5 A. Okay, people moving along the perimeter fence can look
 6 in and shout and -- the drones are more intrusive than
 7 that, to see the whole facility and our management, our
 8 staff.
 9 MR JUSTICE NICKLIN: Is that at your end, Ms Jaffray?
 10 MS JAFFRAY: It will stop in a minute, sorry.
 11 MR JUSTICE NICKLIN: Did you hear? The answer was that the
 12 drone --
 13 MS JAFFRAY: I did. Yes, it's more intrusive, okay. So
 14 staff members pushed the trolleys with dogs right by the
 15 perimeter fencing, so they can't feel that threatened by
 16 being seen by protesters and they do this unmasked, so
 17 I'm not sure why they feel vulnerable with the drone
 18 there if they're happy going about their daily duties
 19 like that. The dogs -- seeing the dogs is a really
 20 emotive obviously thing for protesters to see, so to
 21 push them right up against the boundary fence where
 22 protesters can see them, I fail to see why the drone as
 23 such is such an intrusion.
 24 A. The drone is more of an intrusion to watching the
 25 activity as well, which is movement in and out of the

95

1 units, transfer of the staff, staff in particular, their
 2 identity, the movement of our animals, the business of
 3 what we continue every day.
 4 Q. Okay, but the movement of the animals, the staff quite
 5 often will do that by the perimeter fence so it's not
 6 actually being concealed as such.
 7 A. I'd have to understand the incidences of that.
 8 Q. Okay. We can play it at a later time, maybe, but there
 9 is video footage of the dogs being pushed in trolleys
 10 right next to the perimeter fences, I would say
 11 purposely to antagonise the protesters, so having drones
 12 up actually doesn't expose them any more than what
 13 they're doing themselves.
 14 A. The drone is a different issue to the perimeter fence.
 15 The perimeter fence is limited to the side of the
 16 buildings. The drone is movement across the site and
 17 parallel both ways across the site so it's a very
 18 different activity to have each day.
 19 Q. Okay. So just to clarify, then I'll move on, do you
 20 accept that protesters seeing the dogs is probably the
 21 biggest thing that they can see, the most emotional
 22 part? This is why we are protesting. Seeing them is
 23 the biggest part of the campaign. So staff pushing them
 24 at the perimeter fences is actually a lot worse than
 25 a drone seeing staff walking between buildings?

96

1 A. I would agree that it's for the animals' welfare that we
 2 challenged and changed some of our processes. I would
 3 need to be shown to answer the movement of the dogs in
 4 a crate along the perimeter fence.
 5 Q. Okay, I'll leave that one there. Okay. Just a personal
 6 point you made. What number would you think would
 7 qualify as "a number of"? How many would you think
 8 "a number of" would be?
 9 MR JUSTICE NICKLIN: You need more context than that,
 10 Ms Jaffray. So if you're referring to some part of
 11 Ms Pressick's witness statement, can you show us which
 12 paragraph you're referring to?
 13 MS JAFFRAY: I can do.
 14 While I try and find it, I can tell you anyway. So
 15 you have stated that me, personally, sent something to
 16 a number of members of staff. I just wondered what you
 17 think would be "a number of".
 18 MR JUSTICE NICKLIN: Well, the direct question is -- "How
 19 many members of staff do you say that I've sent things
 20 to?" is the question.
 21 MS JAFFRAY: Yes, that's a better way of phrasing it, yes.
 22 A. A small number, but -- not the full members of staff.
 23 Q. What would you say would be a small number?
 24 A. I would say that it's under ten.
 25 Q. Where have you got the information from, can I ask?

1 A. Sorry, I don't quite understand which reference of --
 2 Q. Okay, I'm sorry --
 3 A. -- (inaudible -- overspeaking) you're referring to.
 4 Q. I am trying to find it. So it's with regard to funeral
 5 brochures being sent to members of staff, and there's
 6 allegations that a few have been sent to a few staff
 7 members.
 8 MS BOLTON: My Lord, I don't think it's this witness.
 9 MR JUSTICE NICKLIN: Ms Jaffray, I'm being told that
 10 Ms Pressick hasn't given that evidence. It's another
 11 witness. I'm not sure whether that's right or not. I'm
 12 looking at Ms Pressick's statement.
 13 MS JAFFRAY: I don't know if I'm able to ask it. How much
 14 assistance have the police given with each of the
 15 employee's statements regarding the protesters?
 16 A. How much police support ...
 17 MR JUSTICE NICKLIN: Well, have the police in any way had an
 18 impact or have they had a contribution to make to your
 19 witness statement?
 20 A. They've had none to my witness statement.
 21 MS JAFFRAY: Do you know about other employees? Have they
 22 been helped and supported?
 23 MR JUSTICE NICKLIN: Well, you may need to be more specific
 24 and I'm questioning whether Ms Pressick would
 25 necessarily know the answer to that question. You can

1 ask whether -- do you know whether the police have been
 2 involved with assisting any of the other people who have
 3 made witness statements?
 4 A. Not in this case.
 5 MR JUSTICE NICKLIN: Right.
 6 MS JAFFRAY: Is that you're not aware or that, no, they
 7 haven't?
 8 MR JUSTICE NICKLIN: "Not in this case" was the answer.
 9 MS JAFFRAY: Okay, so I can ask the individual staff members
 10 that.
 11 So at some point I remember hearing that MBR have
 12 claimed they haven't employed staff to replace the ones
 13 who have left; is that correct?
 14 A. MBR have continued to replace people who have left.
 15 It's a continual programme.
 16 Q. Maybe I misread that. I thought it said that they had
 17 not employed staff to replace them. So have you heard
 18 of the term "compassion fatigue" in animal personnel
 19 staff?
 20 A. "Compassion ..."? Sorry, I'm ...
 21 MR JUSTICE NICKLIN: Have you heard the term "compassion
 22 fatigue"?
 23 A. Compassion fatigue -- you can get compassion fatigue,
 24 yes.
 25 MS JAFFRAY: It's widely known in animal research, animal

1 welfare industry, that a lot of staff suffer from
 2 compassion fatigue so it could be the case that the
 3 staff turnover has been for other reasons than the
 4 protesters being there.
 5 A. Can we refer to a reference, please? I'm starting to
 6 not quite understand.
 7 Q. Yes.
 8 MR JUSTICE NICKLIN: Well, no, it's a legitimate question.
 9 I think what the question is is essentially a number of
 10 the staff have left. It is said that a factor in staff
 11 leaving is the activities of the protesters.
 12 Ms Jaffray's point is that it may be down to other
 13 factors as well. To what extent -- the question is: to
 14 what extent do you know that staff turnover is
 15 attributable to the protesters?
 16 A. It's mostly attributable to the protesters.
 17 MR JUSTICE NICKLIN: Right. Do you carry out exit
 18 interviews?
 19 A. Yes, we -- yes.
 20 MR JUSTICE NICKLIN: And would it feature in those in
 21 relation to their explaining their reasons for leaving?
 22 A. Their reasons, yes.
 23 MR JUSTICE NICKLIN: Right. Okay.
 24 MS JAFFRAY: And you've personally seen these exit
 25 interviews?

1 A. Well, our HR would have those ---
 2 Q. Okay. And that's the feedback that you received as to
 3 why they've left their role?
 4 A. When they're giving notice to leave, they explain that
 5 they can't continue to carry out coming on to site every
 6 day through the situation.
 7 Q. Right. Okay. How often have staff from B&K had to
 8 travel to the Wyton site specifically to cover staff
 9 shortages?
 10 A. Probably a few months last year.
 11 Q. Would that be daily or weekly or ...?
 12 A. It would be weekly.
 13 Q. So once a week a member of staff travelled or how many
 14 members of staff would you think?
 15 A. A small number, but the time they travel would be for
 16 a block of a week period, to allow for travel and
 17 working on the site.
 18 Q. Right. Okay. Are you aware of any occasion that the
 19 protesters have stopped staff from entering the site?
 20 A. Am I aware that the protesters have stopped staff?
 21 Q. Stopped staff members, yes, from entering the site.
 22 A. There has been instances where the site entrance has
 23 been blocked by protesters not moving to clear the way.
 24 There's been delays in staff having to come on to site.
 25 Q. Okay. So I would put to you actually that, when the

101

1 camp was set up, there was a unanimous decision that
 2 staff would never be hindered from entering the site
 3 because the dogs obviously is our primary concern and we
 4 would not stop staff from entering because the dogs
 5 needed to be fed, they needed to be tended to, they
 6 needed to be cleaned out, et cetera. I'm not aware of
 7 any occasion that staff have been stopped --- prevented
 8 from going on site.
 9 A. They've been delayed. That was my answer. There's been
 10 a delay.
 11 Q. Okay. I'm not aware of that either. I think the
 12 protesters have been there with their placards. At the
 13 early days the police were there to facilitate them in,
 14 obviously not knowing what protesters were going to do.
 15 They've certainly not been delayed by more than seconds,
 16 I would think. They can't drive very fast in what
 17 I call the "access driveway". They'd be going at like
 18 5 miles an hour anyway. So I don't think there's been
 19 any delays with them entering.
 20 So with the contractors who have stopped working
 21 with MBR due to the protests being there, would you be
 22 aware that some of these contractors have stopped
 23 because they've been made aware of what MBR do?
 24 A. Some I don't know why. Some I do know that the drivers
 25 don't like coming through the protest.

102

1 Q. Okay. And some have stopped because they've become
 2 aware of what MBR Acres does because of the protesters
 3 have raised the awareness.
 4 A. I --- yes, I would say. I'm not fully privileged to the
 5 reasons for all of the suppliers. They've described
 6 that they would prefer not to come back to site.
 7 Q. Yes, okay. Thank you. So welfare issues for the dogs
 8 when animal transport has not been able to be made.
 9 What welfare concerns are there if the dogs are
 10 remaining at MBR Acres for longer than planned?
 11 MR JUSTICE NICKLIN: Well, Ms Jaffray, that's, I'm afraid,
 12 the same territory that Mr Curtin went into. It's not
 13 a relevant issue in this litigation.
 14 MS JAFFRAY: Okay. So the extra security --- I think
 15 Mr Curtin has covered this --- this was not down to the
 16 protesters; is that right? It's down to a group who
 17 liberated some dogs?
 18 MR JUSTICE NICKLIN: Well, in fairness, I think the fair
 19 summary of Ms Pressick's evidence is that they increased
 20 the security at the Wyton site because of the protest
 21 activities initially, so that's in the summer of 2021,
 22 and then there were further increases in security
 23 following the break-ins.
 24 MS JAFFRAY: Right, okay. So regarding insurance for lease
 25 cars for members of staff --- so, for example, when

103

1 I worked for the NHS, some of my colleagues worked with
 2 quite risky patients. They were never given a lease car
 3 so they could protect themselves when they left work.
 4 Why is there a need for staff to have lease cars
 5 financed for them? What relevance has that got to the
 6 protests being there?
 7 A. If I understand, the finance is not for the staff
 8 member, it's additional cost to have lease cars for the
 9 (inaudible - overspeaking).
 10 Q. Yes, that's what I meant.
 11 A. Is that what you meant?
 12 Q. So the staff members have paid for them; do you mean?
 13 A. No, the company pays for the lease cars. They're hire
 14 cars. They've hired cars for short periods of time.
 15 There's no cost to the staff member.
 16 Q. Okay. Why have the company felt that they had to do
 17 this for the members of staff?
 18 A. Well, one, so they're not using their own cars for
 19 business and, two, we had quite a few people travelling
 20 so it made sense to have some hire cars. So we use the
 21 hire cars rather than staff members' cars when they're
 22 travelling distance and for insurance.
 23 Q. Okay. That was the choice of MBR, not specifically
 24 because cars were being damaged when they went in, for
 25 example?

104

1 A. The choice at the time was to make sure that the staff
 2 had the right car, the right insurance and they were
 3 company—supported.
 4 MR JUSTICE NICKLIN: Can I just ask, when did you start that
 5 process of having hire cars?
 6 A. Quite soon. It would go back to early 2022 at least.
 7 MR JUSTICE NICKLIN: Right. Is it for all employees or just
 8 those who wanted it?
 9 A. For any employee that has to travel for business or the
 10 company.
 11 MR JUSTICE NICKLIN: Right. So are there any employees that
 12 are still using their own cars for coming to and from
 13 work?
 14 A. No, no.
 15 MR JUSTICE NICKLIN: Right.
 16 A. Not to site — not to site at all.
 17 MS JAFFRAY: I think there is. I think Mr Curtin could
 18 probably agree with that, that there are still people
 19 using their own personal cars.
 20 MR JUSTICE NICKLIN: Well, I'm not entirely sure how you
 21 would know that, Ms Jaffray, because I can't imagine —
 22 I don't imagine that hire cars are necessarily
 23 emblazoned with the name of the hiring company on them,
 24 but —
 25 A. Yes, some of the cars are quite distinctive and they've

105

1 been travelling in since the very beginning.
 2 MR JUSTICE NICKLIN: Okay.
 3 MS BOLTON: My Lord, I think we're talking at
 4 cross—purposes. I think there's confusion, just so the
 5 right questions can be asked to the witness.
 6 MR JUSTICE NICKLIN: Okay.
 7 MS BOLTON: I think the witness is talking about something
 8 completely different. I don't think she's talking about
 9 the staff at the Wyton site going to the Wyton site
 10 daily. I think she might be talking — I'll let her
 11 explain.
 12 A. Oh, okay. So I'm answering the question on the basis
 13 that staff travelling from one company to the other
 14 company —
 15 MR JUSTICE NICKLIN: Oh, you're talking about B&K?
 16 A. Any staff travelling to another site has a company
 17 car —
 18 MR JUSTICE NICKLIN: Right.
 19 A. — where — sorry — staff's own cars, they drive to
 20 work as anyone would drive to work.
 21 MR JUSTICE NICKLIN: Oh, okay.
 22 MS BOLTON: The insurance issue arises, my Lord, because
 23 you're sending staff to a different business so their
 24 social/pleasure use, which allows them to go to their
 25 permanent place of work, doesn't cover them if they then

106

1 have to go to a different site.
 2 MR JUSTICE NICKLIN: Right, okay.
 3 MS JAFFRAY: So there has been no lease cars used for staff
 4 members that work at Wyton and travel to Wyton each day?
 5 The lease cars have all been funded for staff that are
 6 travelling from one site to another; is that right?
 7 A. Just to make it clear that the — if a staff member was
 8 moving on business required for transfer to another site
 9 or training or some other location, a company car —
 10 hire car is normally provided with insurance. Travel to
 11 and from work and home is your own private car.
 12 Q. Right, okay. I think we've covered that one. So this
 13 one you might not be able to answer actually. It might
 14 be better to ask the individual members of staff.
 15 I just wondered, when compiling the video evidence, how
 16 that was actually done. Have staff members gone back
 17 and watched them and then pulled out protesters that
 18 they think they could name and state that this
 19 particular protester was behaving —
 20 MR JUSTICE NICKLIN: Ms Jaffray, you need to establish first
 21 whether Ms Pressick knows anything about that process.
 22 She may, she may not.
 23 MS JAFFRAY: Okay.
 24 MR JUSTICE NICKLIN: Do you know about how individual
 25 witnesses have prepared their statements?

107

1 A. They do them separately themselves with the ...
 2 MR JUSTICE NICKLIN: With the solicitors?
 3 A. Yes.
 4 MS JAFFRAY: Is that the same —
 5 MR JUSTICE NICKLIN: Ms Jaffray, she's not been part of the
 6 process of sitting with the individual employee as they
 7 make their statement. The procedure, as would be
 8 normally the case, is the witness would be seen by the
 9 solicitors and the solicitors will take the witness
 10 statement from the individual.
 11 MS JAFFRAY: Right, and that's the same with the videos,
 12 is it?
 13 MR JUSTICE NICKLIN: Yes.
 14 MS JAFFRAY: Yes, okay.
 15 So the last question. So if the interim injunction
 16 is granted, do you think that everything would go back
 17 to normal, how it was before the protesters arrived?
 18 MR JUSTICE NICKLIN: I think you mean, do you, the
 19 injunction that's already in place, if that were
 20 continued?
 21 MS JAFFRAY: Yes.
 22 MR JUSTICE NICKLIN: Right. Would it go back to normal?
 23 A. If the injunction continues and is approved to final
 24 stage, that wouldn't go back to normal because it's
 25 improved immensely the situation from 2021. So it

108

1 wouldn't revert back to a normal status if that's the
2 purpose of the injunction.
3 MS JAFFRAY: So you think the injunction as it stands at the
4 moment is rectifying any of the issues that came about
5 with the protest camp being there?
6 A. It has improved and calmed the situation.
7 MS JAFFRAY: Right, okay. That's all I needed to ask.
8 Thank you.
9 MR JUSTICE NICKLIN: All right. Thank you very much,
10 Ms Jaffray.
11 MR CURTIN: Could I ask one question -- you can say "No" --
12 MR JUSTICE NICKLIN: Go on.
13 MR CURTIN: -- before the cross-examination [sic]?
14 Further cross-examination by MR CURTIN
15 MR CURTIN: In terms of -- do you know why the dogs are
16 flown via Denmark? Surely if it's about animal welfare
17 and speed, why do the dogs have to go through Denmark
18 and then (inaudible), do you know? I'm asking do you
19 know.
20 A. I don't specifically know, but the flight has to go
21 through a European area to get to the UK -- transfer to
22 the UK.
23 Q. Well, the UK is in Europe, isn't it?
24 A. Well, it's --
25 MR JUSTICE NICKLIN: Well, not anymore. Only

109

1 geographically.
2 MR CURTIN: Are you saying it has to do it because it has to
3 go into -- what are you saying, what's your answer,
4 because we are in kind of Europe still -- maybe not part
5 of the EU -- but why do the dogs go via Denmark?
6 A. It's not necessarily Denmark. It's Europe that they
7 transfer into because they're travelling from the US --
8 MR JUSTICE NICKLIN: Do you happen to know why that -- is
9 there a regulatory reason why that's the case?
10 A. It's just the flights.
11 MR CURTIN: Are you aware of your parent company, all the
12 way over in America -- are you aware of any connection
13 between America, before it gets to Bantin & Kingman,
14 a business in Denmark, Great Divide ApS? Have you ever
15 heard of Great Divide ApS in your life?
16 A. I'm not aware of them.
17 Q. You're not aware of them. It's your holding company.
18 A. I'm not privileged to the US structure of the company.
19 Q. You mean you've never heard of Great --
20 A. I have heard of it.
21 Q. Oh, you have heard of it.
22 MR JUSTICE NICKLIN: Mr Curtin, we're off piste again now.
23 MR CURTIN: Part of the injunction, you want to extend the
24 injunction to Bantin & Kingman because you think it's
25 going to happen. I put it to you that that's pure

110

1 speculation. You don't -- the controversy at MBR Acres,
2 the height of the emotions, is clearly based around the
3 dogs. That's what happened before. In
4 Bantin & Kingman, when you were going to have a dog
5 factory, it created a massive furore. Have you got any
6 current plans to build a dog breeding facility at
7 Bantin & Kingman?
8 A. There's no applications to the authorities.
9 Q. What do you base this -- it's pure supposition. Has
10 there been one demonstration in the time -- 20 months,
11 there's been one demonstration, a small demonstration.
12 A. I think I answered that earlier where there was one
13 demonstration. There is some media mention of B&K --
14 Q. What about if I was to say to you that --
15 A. Sorry, sorry.
16 Q. I'm sorry.
17 A. -- and there is also a poster at the moment to announce
18 a protest at B&K, July--time.
19 Q. Okay. I put it to you that it's baseless supposition.
20 It's guesswork that the ...
21 MR JUSTICE NICKLIN: That's really about submission. That's
22 about submission, Mr Curtin, a different phase in the
23 trial.
24 MR CURTIN: One last question before I sit down. I put it
25 to you that the way that Marshalls treat dogs, you don't

111

1 treat them as dogs, you treat them as objects.
2 MR JUSTICE NICKLIN: Mr Curtin, that's not ...
3 Right.
4 MS BOLTON: No re-examination, my Lord.
5 MR JUSTICE NICKLIN: Thank you very much.
6 Thank you very much, Ms Pressick. That completes
7 your evidence. You can take a place back --
8 A. Can I keep those I've been given?
9 MR JUSTICE NICKLIN: Yes, of course. You might need to pass
10 them over to your solicitors. They'll probably want to
11 copy them.
12 A. Oh, right. Okay.
13 MR JUSTICE NICKLIN: But take them with you.
14 (The witness withdrew)
15 MS BOLTON: My Lord, is it a good time for an Opus break
16 before we start the next witness?
17 MR JUSTICE NICKLIN: All right. Thank you, everybody.
18 (2.42 pm)
19 (A short break)
20 (2.55 pm)
21 MR JUSTICE NICKLIN: Right. Ms Bolton.
22 MS BOLTON: My Lord, the claimants would call their second
23 witness, which is Wendy Jarrett. My Lord, you'll find
24 Ms Jarrett's statement starts at page 1166 in the
25 persons unknown trial bundle.

112

1 MR JUSTICE NICKLIN: Thank you.
 2 MS WENDY JARRETT (affirmed)
 3 MR JUSTICE NICKLIN: Ms Jarrett, feel free to take a seat
 4 during your evidence or stand, as you wish, whichever
 5 you're more comfortable with.
 6 A. Thank you.
 7 Examination—in—chief by MS BOLTON
 8 MS BOLTON: Ms Jarrett, good afternoon. Could you please
 9 give the court your full name and occupation?
 10 A. Yes, my name is Wendy Jarrett and I am the chief
 11 executive of an organisation called "Understanding
 12 Animal Research".
 13 Q. Ms Jarrett, there should be a bundle in front of you —
 14 it may already be at the right page, I'm not sure —
 15 with your witness statement, which will be at page 1166.
 16 A. Yes.
 17 Q. May I ask, can you just turn through that statement to
 18 page 1174, please? It should be the end of the text of
 19 your statement.
 20 A. Yes.
 21 Q. Is that your signature?
 22 A. Yes, it is. Yes.
 23 Q. And are the papers that follow it, at exhibits 1175 to
 24 1248 — is that the exhibit to your witness statement?
 25 A. Yes.

113

1 Q. Is the content of your witness statement still true to
 2 the best of your knowledge and belief?
 3 A. I believe so, yes.
 4 MS BOLTON: Ms Jarrett, if you remain there, there may be
 5 some further questions.
 6 A. Thank you.
 7 Cross—examination by MR CURTIN
 8 MR CURTIN: So, Ms Jarrett, you've been called to give
 9 evidence. Isn't it right that you're — for all intents
 10 and purposes, your current career is that of
 11 a spokesperson for understanding animal research? You
 12 work with animal —
 13 A. I'm the chief executive of Understanding Animal
 14 Research.
 15 Q. And they are a lobby group?
 16 A. We are the UK's animal research advocacy group, yes.
 17 Q. And would it be that surprising for me to call you
 18 a lobby group on behalf of the industry? Would that be
 19 fair?
 20 A. We exist to help the public to understand why and how
 21 animals are used in research in the UK and our
 22 membership comprises about 35 universities, the Medical
 23 Research Council, Cancer Research UK, the British Heart
 24 Foundation, some pharmaceutical companies, breeders of
 25 animals for research, contract research organisations.

114

1 We have something over 140 organisations that contribute
 2 to our work.
 3 Q. Including Marshall BioResources —
 4 A. Including MBR Acres, yes.
 5 Q. — who are helping to pay your wages for today?
 6 A. Marshalls contributes — I did the maths on this —
 7 2.26% of our income last year.
 8 Q. That's a hefty clump.
 9 A. 2.26%.
 10 Q. How many other funders have you got?
 11 A. About 140 something others.
 12 Q. So that's a good chunk.
 13 MR JUSTICE NICKLIN: Well, that's a comment, Mr Curtin.
 14 MR CURTIN: Sorry.
 15 Let me go to paragraph 6 of your statement.
 16 A. Yes.
 17 Q. I should make it clear that I'm not a scientist nor
 18 am I a lawyer. You're not here as — I wouldn't class
 19 you as an expert witness.
 20 A. I'm not an expert witness.
 21 Q. Okay, good. Right, let's go straight on. My
 22 understanding is that, subject to very limited
 23 exceptions, UK law requires all potential medicines
 24 intended for human use to be tested on two species of
 25 mammal; yes?

115

1 A. Yes.
 2 Q. Which law — ah, I think we go on. The requirement —
 3 ah, which law do you refer to there?
 4 "My understanding is that ... UK law ..."
 5 Which law?
 6 A. So the other sections of the witness statement explain
 7 that.
 8 Q. Well, they talk about — sorry.
 9 A. So Schedule 1, Part 2, of The Medicines for Human Use
 10 (Clinical Trials) Regulations 2004 states:
 11 "Clinical trials shall be conducted in accordance
 12 with the principles of the declaration of Helsinki
 13 [adopted by the World Medical Assembly in June 1964, as
 14 amended by the General Assembly of the Association
 15 in October 1975 ...", et cetera, et cetera.
 16 Q. But those aren't UK laws, are they? You said that UK
 17 law requires —
 18 A. So as it says, it's quoted in section 6 of The Medicines
 19 for Human Use (Clinical Trials) Regulations 2004.
 20 Q. It's not law, is it? It's a regulation?
 21 MR JUSTICE NICKLIN: Well, it is law, Mr Curtin. It's
 22 what's called secondary legislation. It's a statutory
 23 instrument but it's as much law as statute.
 24 MR CURTIN: Okay. Then this law, this secondary law,
 25 requires potential medicine to be tested on two species

116

1 of mammals; yes?
 2 A. Yes.
 3 Q. Does it stipulate what they are, what --
 4 A. It stipulates that one should be a rodent and one should
 5 be a larger, non-rodent mammal.
 6 Q. Okay. So it didn't say you should do it on dogs?
 7 A. It doesn't stipulate dogs. The custom is it's usually
 8 a dog, pig or a monkey, a non-human primate.
 9 Q. When you say "custom", how old is this custom?
 10 A. As old as those regulations.
 11 Q. And the regulations, how old are they?
 12 A. As I just said, they come from -- the Helsinki
 13 Declaration is June 1964, which was then amended by the
 14 General Assembly of the Association in October 1975,
 15 October 1983, September 1989 and October 1996.
 16 Q. Okay. I'll need to have a word with the judge in my
 17 evidence about UK law. Are you aware of -- you will be
 18 aware of ASPA --
 19 A. Yes.
 20 Q. -- the Animals (Scientific Procedures) Act. Are you
 21 aware of the special section relating to specially
 22 protected species?
 23 A. Yes.
 24 Q. What does that say? I think C5 --
 25 A. That is -- so the Animals (Scientific Procedures) Act

117

1 1986, as amended then later, covers all use of
 2 vertebrate animals in the UK in scientific research --
 3 all vertebrate animals and cephalopods, and there are
 4 stipulations that they can only be used in research if
 5 there is no non-animal alternative available that's
 6 practical to be used in that circumstance to answer that
 7 question. ASPA then has an extra layer of protection
 8 for what are known as specially protected species, so
 9 that's non-human primates, dogs, cats and equids, so
 10 horses, donkeys, ponies, and those species of animals
 11 are given the extra protection that they cannot be used
 12 in research in the UK if it can be shown that the same
 13 question could be answered using a different species,
 14 another species of animal.
 15 Q. Okay. So you've talked here about the custom of using
 16 dogs. Is that it? Is it just a custom? Is that why
 17 they use dogs?
 18 A. I think I've answered that.
 19 Q. Well, tell me. Tell me. You use the word it's
 20 a custom.
 21 A. So the regulations require that two species of mammal
 22 are used in order to prove that new medicines are safe
 23 before they're given to human volunteers in clinical
 24 trials, and the regulations state that that should be
 25 a rodent and a larger non-rodent species, and, as

118

1 I said, those animals are usually the pig, the dog or
 2 the non-human primate.
 3 Q. But in this country we've got ASPA, haven't we, which is
 4 the law -- which is definitely a law, isn't it? Is it?
 5 A. Yes.
 6 Q. That's not secondary law.
 7 A. No, it's a law.
 8 Q. Is a secondary law -- anyway, I'm not sure.
 9 MR JUSTICE NICKLIN: Well, Mr Curtin, a career in the law
 10 perhaps beckons, so you can learn all about it.
 11 MR CURTIN: Are you -- I can't believe I'm asking
 12 a High Court judge. So the law in this country does
 13 relate to the Helsinki Act of 1964. Is that what you're
 14 saying, that we are bound by the Helsinki Act of 1964?
 15 MR JUSTICE NICKLIN: No, no. We have chosen -- Parliament
 16 can choose to enact directly or indirectly obligations
 17 that -- our country has signed up to various conventions
 18 or treaties. That's what has happened here. So by
 19 secondary legislation, which is statutory instrument --
 20 the regulations that are referred to in paragraph 8 of
 21 Ms Jarrett's statement are a statutory instrument that
 22 introduce The Medicine for Human Use (Clinical Trial)
 23 Regulations. They are as much English law as a statute
 24 would be.
 25 MR CURTIN: Okay.

119

1 MR JUSTICE NICKLIN: You don't need to worry about that,
 2 Mr Curtin, you really don't.
 3 MR CURTIN: I do worry because it's part of my main thrust.
 4 If I could point you to -- bear with me, a bit of
 5 fumbling around.
 6 In a bundle of documents that I sent very late last
 7 night, but perhaps you'll know about it, there was
 8 a small quotation mark -- it looks like that -- and it's
 9 taken from --
 10 MS BOLTON: I'm not sure if Ms Jarrett has it though. She
 11 might need it.
 12 MR CURTIN: Hopefully she's going to be -- the All Party
 13 Parliamentary Group for Human-Relevant Science. Are you
 14 aware of that?
 15 A. I'm aware it exists. It's one of many all party
 16 parliamentary groups.
 17 Q. Yes. Within that article --
 18 MR JUSTICE NICKLIN: Ms Jarrett doesn't have that yet so
 19 let's give her ... (Handed)
 20 MR CURTIN: Yes, I'm about to ask her ...
 21 MS BOLTON: Take her to the paragraph as well please.
 22 MR CURTIN: Yes.
 23 MR JUSTICE NICKLIN: Now, just describe to Ms Jarrett what
 24 this document is to help her.
 25 MR CURTIN: It's a discussion document from a parliamentary

120

1 group and I draw her attention to the quote marks in
 2 blue. Can you see it? They're on the second page, the
 3 wording of "Current regulatory ...".
 4 A. Okay, yes.
 5 Q. Read perhaps, if you could, the couple of lines --- in
 6 fact the paragraph before would be great, if you could
 7 read that.
 8 MS BOLTON: Which paragraph?
 9 A. Do you have a question?
 10 MR CURTIN: "The need for updated guidance", if you could
 11 read that from that paragraph on and then finish ---
 12 A. Sorry, do I need to read this?
 13 MS BOLTON: Yes, please.
 14 MR CURTIN: Just to give us some context, yes, please.
 15 MR JUSTICE NICKLIN: I'm trying to find where we are.
 16 MR CURTIN: There's two pages.
 17 MR JUSTICE NICKLIN: There are paragraph numbers in the
 18 document, aren't there?
 19 MR CURTIN: No, there's not.
 20 MS BOLTON: My Lord, if I hand up another copy.
 21 MR CURTIN: It's the paragraph preceding this highlighted
 22 quote mark.
 23 MR JUSTICE NICKLIN: Just a minute. (Handed)
 24 MS BOLTON: It's paragraph 2.4, my Lord, above the
 25 quotation.

121

1 MR JUSTICE NICKLIN: Right. What are we looking at,
 2 Mr Curtin?
 3 MR CURTIN: It's a document from the ---
 4 MR JUSTICE NICKLIN: No, no, in the document.
 5 MR CURTIN: In the document, the highlighted quote mark and
 6 the paragraph preceding it, but it's really the
 7 highlighted paragraph.
 8 MR JUSTICE NICKLIN: "The wording of current regulatory
 9 ..."?
 10 MR CURTIN: Yes.
 11 MR JUSTICE NICKLIN: Right.
 12 A. So the highlighted one and the one above?
 13 MR CURTIN: The highlighted one, the one with speech marks.
 14 A. "The wording of current regulatory guidance almost
 15 exclusively refers to animal use for these tests,
 16 driving the expectation that animal tests are required
 17 for regulatory approval [as read]."
 18 Q. Yes, this is a quote from someone who works for the
 19 Medical Healthcare Regulation Authority and his opinion
 20 seems to be different to yours, that we have to use
 21 animals.
 22 A. Well, I think I've agreed that the wording of current
 23 regulatory guidance refers to animal use for these
 24 tests.
 25 Q. Yes, but there's no expectation. We are not legally

122

1 bound --- we are not legally bound in this country is my
 2 case to you.
 3 MR JUSTICE NICKLIN: Well, that's a question of law,
 4 Mr Curtin. I'm not sure you're right about that. The
 5 regulatory framework ---
 6 MR CURTIN: Okay for dogs. Let's keep it to dogs then
 7 because I want to keep it to dogs. There is no
 8 regulatory authority in this country that says we have
 9 to experiment on dogs, is there?
 10 A. There is a requirement that, as I said, two species of
 11 mammal are used in order to protect human volunteers
 12 from taking first-in-man substances in human clinical
 13 trials, and one of those animals needs to be a larger,
 14 non-rodent species, which in this country can be pig,
 15 dog or non-human primate, and all three are used.
 16 Q. But it's the dog that gets used, isn't it?
 17 A. No, all three are used.
 18 Q. What about the numbers? You've got some understanding
 19 of the industry because you work for the ---
 20 A. Yes, there are more dogs used ---
 21 Q. More dogs. How much more dogs, percentage?
 22 A. There are around --- last year around 4,000 procedures
 23 using dogs --- sorry, the last year for which there are
 24 statistics published, which was 2021, there were about
 25 4,000 procedures using dogs, so that's not 4,000 dogs

123

1 because some dogs are used more than once. So 4,000 ---
 2 and the equivalent number for non-human primates was
 3 about 3,000, so it's slightly fewer non-human primates
 4 used than dogs.
 5 Q. I'm talking about regulatory procedures.
 6 MR JUSTICE NICKLIN: Mr Curtin, we don't need to spend a lot
 7 of time on this because ultimately it's a matter of law.
 8 The position is like this --- and Ms Jarrett will correct
 9 me if I'm wrong --- which is the law requires certain
 10 tests to be carried out. It doesn't mandate what
 11 specific animal it has to be tested on but there are
 12 parameters which Ms Jarrett has set out. So you're
 13 right to say that the law doesn't mandate testing on
 14 dogs, but Ms Jarrett says the law mandates testing on
 15 animals and the practice is, for reasons that she
 16 explains in her statement, that dogs and particularly
 17 beagles are well suited for clinical research.
 18 Ms Jarrett will correct me if I've misunderstood her
 19 evidence but you are right to the extent of saying the
 20 law doesn't mandate testing on dogs but it does mandate
 21 testing.
 22 MR CURTIN: Okay. And this legislation goes back to 1964 ---
 23 yes? --- the Helsinki agreement?
 24 A. It's actually not. It's probably before then ---
 25 Q. Okay.

124

1 A. -- and what brought it into sharp focus in the UK was
 2 the Thalidomide tragedy of the late 50s and early 60s,
 3 where animals were not used correctly to test that drug
 4 in the way that it was going to be used in clinical
 5 practice, and, interestingly, the US refused to give it
 6 a licence in the US because the FDA at the time said
 7 that not enough testing had been done. So the Medicines
 8 Act 1958 also has a bit of bearing on this, but
 9 I haven't mentioned that in here.

10 Q. But there was extensive testing on Thalidomide amongst
 11 animals.

12 A. But not pregnant animals and not in the correct way.

13 Q. There were experiments on pregnant animals.

14 A. I'm not sure that this is relevant, but --

15 Q. No, okay. Well, you did say --

16 A. I did bring it up. I'm sorry.

17 Q. So would you say we're dealing with -- do you talk about
 18 cutting edge science in your statement? It's your case
 19 that we should rely on these dog experiments to give
 20 a good indicator, toxicology, of a certain product?

21 A. The way that dogs are used is to see whether -- the hope
 22 is that dogs used in pre-clinical toxicology testing
 23 will not be made ill. So if you think about it, you've
 24 gone through 15/20 years of drug development and the
 25 final gateway before you can give your potential new

125

1 medicine to human volunteers are these animal tests. So
 2 you've been through the computers, the cell models, the
 3 organoids, the chips, the liver on chip, the lung on
 4 chip, everything, you've done all that, and you're now
 5 testing on animals and what you want --

6 Q. Whether --

7 A. Sorry, I'm just answering your question.

8 Q. Sorry.

9 A. -- what you want is that the animals are healthy at the
 10 end of the trial, so what you're looking for in the dog
 11 is that doesn't have any adverse effects.

12 MR JUSTICE NICKLIN: The hypothesis is that it will not harm
 13 the animals?

14 A. Yes, a lack of toxicity is what you're looking for in
 15 the animal because the -- I have some evidence in this
 16 witness statement -- the percentage likelihood of
 17 a medicine being safe in humans if it has been safe in
 18 dogs is extremely high, and together with the data from
 19 the rodent model, plus all other pre-clinical tests,
 20 that's what's looked at by the MHRA and then they will
 21 give approval or not for the clinical trial to go ahead.
 22 But the last thing you want is for a dog to be ill in
 23 that pre-clinical test.

24 MR CURTIN: Really? So say if we weren't talking about
 25 medicines -- because there are also regulatory

126

1 procedures that dogs get used for for chemicals.

2 A. A very, very low number.

3 Q. Yes, but they do get used. But, for example,
 4 chocolate -- chocolate would fail the toxicity test,
 5 would it not --

6 A. It does.

7 Q. -- on dogs?

8 A. Yes, so that's why we don't test chocolate on dogs.

9 Q. So there's a species difference -- when it comes to
 10 chocolate, there's a species difference. Are you aware
 11 of any other different reactions in dogs, say, to us or
 12 dogs to mice? Are you aware of species --

13 A. I'm sure there are. I'm not a toxicologist. I'm sure
 14 there are differences, but that will be known by the
 15 people who design the trials and, should there be
 16 a substance involved in the medicine that is known to be
 17 different, there's a species difference between humans
 18 and dogs, then that perhaps would be where they would
 19 use a pig or a monkey instead of the dog.

20 Q. And you talked -- didn't you just say in your statement
 21 that there's non-animal methods, there's computers and
 22 cells -- all these fancy techniques -- and then they
 23 move on to the animal experiments. Is that what you're
 24 saying?

25 A. Yes.

127

1 Q. What do you base that on?

2 A. The fact that a lot of non-animal research happens
 3 before the animal research happens. So, I mean, for
 4 instance, I think -- was it in here? Was it in this
 5 article? I was just interested, that little symbol of
 6 pre-clinical (Indicates) has animals and it has a petri
 7 dish, it has a microscope, it has DNA, it has all sorts
 8 of --

9 Q. But I'm talking about --

10 MS BOLTON: Let her finish her answer, please.

11 MR CURTIN: I apologise. Sorry, my Lord.

12 A. So pre-clinical is not just the animal research, it's
 13 all the other parts as well, the in vitro, in vivo --
 14 sorry, that is the animal -- in vitro, in silico, cell
 15 cultures, organoids, livers on chip, whatever, that's
 16 all pre-clinical research.

17 Q. But they're not required to pass the test, are they?
 18 It's the animal experiments?

19 A. You want safety data, so safety data is taken in lots of
 20 different ways, including -- I mean, you sent some
 21 information about a liver on a chip. It's fantastic,
 22 brilliant. I really hope it gets used more.

23 Q. Great.

24 A. It does pick up some toxicity in the liver --

25 Q. Better than some -- very, very --

128

1 MS BOLTON: Let her finish.
 2 A. In some cases better than animals, which is what we
 3 really hope for. I don't want to see animals used in
 4 research. I think you and I can agree on that. Nobody
 5 wants to use animals in research. We want the
 6 alternative to come through. We want there to be a way
 7 of proving that human beings are not going to be harmed
 8 by potential new medicines that doesn't involve animals.
 9 MR CURTIN: But you represent -- and your understanding of
 10 animal research and Marshall BioResources, I see it --
 11 in fact, when you said "We don't want ..." -- let's go
 12 to that. 16, point number 16, paragraph 16.
 13 A. Yes.
 14 Q. "It is incredibly to note that nobody wants to test
 15 potential medicines on animals, let alone dogs."
 16 Would you apply that to a man called Scott Marshall
 17 who owns Marshall BioResources?
 18 MR JUSTICE NICKLIN: Okay, Mr Curtin --
 19 MR CURTIN: Oh, please.
 20 MR JUSTICE NICKLIN: No, we're moving away.
 21 MR CURTIN: She does say "everyone".
 22 " ... that nobody wants ..."
 23 I'm suggesting that Marshall BioResources have
 24 a vested interest in keeping this practice going.
 25 Would you accept that?

129

1 A. I don't know quite how to answer that. I would imagine
 2 that it's an important part of their business but I know
 3 that they have other parts of their business.
 4 Q. So "nobody wants to test potential medicines", maybe in
 5 brackets, "except people with a vested interest in
 6 making money from it"?
 7 A. I haven't asked Scott Marshall his view on that.
 8 Q. Would you accept the point may be wrong there, you may
 9 be mistaken there, that nobody wants these animal
 10 experiments to carry on?
 11 A. I have never met anybody who stated that they would
 12 rather use an animal than a non-animal method.
 13 Q. What about Marshall BioResources, whose business --
 14 A. I have never met anybody who stated that they would
 15 rather use an animal than a non-animal method.
 16 MR JUSTICE NICKLIN: Mr Curtin, I think you have the
 17 evidence you need, which is -- your valid point, which
 18 you can make in submissions, is that those who breed
 19 animals for clinical research may have a vested interest
 20 in that business continuing.
 21 MR CURTIN: Good.
 22 MR JUSTICE NICKLIN: You can make that submission to me.
 23 It's not a question for Ms Jarrett.
 24 MR CURTIN: I would put it to you that your organisation
 25 would have a vested interest in its continuation.

130

1 A. I gave a presentation yesterday where I said our vision
 2 was a time when we -- we would love to do ourselves out
 3 of a job. We would love there to be a time where we
 4 didn't have to use animals in research.
 5 Q. Okay, so -- but because of the 1964 Helsinki Act, we're
 6 still having to use it.
 7 Can I make a point? Hopefully I'll be allowed to.
 8 Technology, how it's moved on since 1964. Would you
 9 accept that this phone that I'm holding would have more
 10 computer capacity than entire NASA space missions, so
 11 things have changed, things have moved on? So I put it
 12 to you that animal experiments, you want to put them
 13 into history and I would agree with you. Good.
 14 So would you agree that there is an ever-growing
 15 body of evidence and an ever-growing clamour for this
 16 area to be looked at, so we can come into the 20 -- God
 17 knows what century it is.
 18 A. 21st, I think.
 19 Q. Yes.
 20 A. There is an awful lot of work happening to find -- to
 21 create alternatives to using animals in research. We
 22 have in the UK the lead -- the world's leading centre
 23 for finding and creating replacements for animals, but
 24 also reducing the number of animals and refining the use
 25 of that -- those animals in that work.

131

1 Q. And if -- we talked about the three Rs, the centre --
 2 the three Rs, you were just talking about world-leading.
 3 It's correct, isn't it, that if a product licence
 4 doesn't evaluate the three Rs in the way it should, it
 5 will be refused?
 6 A. It will certainly be sent back and asked to clarify
 7 those positions.
 8 Q. And refused?
 9 A. It would -- if it then -- after asking for further
 10 revisions, it didn't explain that properly, then it
 11 would be refused, but usually most project licences then
 12 go back to provide that information which has been
 13 requested.
 14 Q. And not only usually are they passed, I would go as far
 15 as to say that all project licences are passed by the
 16 Home Office, to the point that I know -- I don't know if
 17 you correlate the same information as me -- one project
 18 licence I think in the past 20 years has been refused.
 19 A. Quite a lot are refused at first draft and sent back and
 20 asked for further details, further work, further
 21 clarification. It's quite rare for a project licence to
 22 be granted first time round. It's an iterative process.
 23 They're sent back and sent back and sent back and
 24 there's lots of corrections that have to be played and
 25 it usually takes -- it's a process that takes several

132

1 months. So it's not the case that -- it's not the case
 2 that all project licences are accepted and approved on
 3 their first reading by the Home Office.
 4 Q. But they're all -- to all intents, they're all accepted
 5 eventually -- after the redrafting they get accepted?
 6 A. Probably eventually after many, many iterations, yes.
 7 Q. Who is in charge of that?
 8 A. There's a body called the Animal Science Regulation Unit
 9 of the Home Office.
 10 Q. They're part of the Home Office?
 11 A. Yes.
 12 Q. Do you know if they're funded by the Home Office --
 13 they're funded?
 14 A. They're funded on a cost recovery basis by the research
 15 community.
 16 Q. So the inspectors are funded by the people they're meant
 17 to be inspecting, for example --
 18 A. The Home Office charges for each licence and the money
 19 that is taken from those licences funds that unit.
 20 Q. So the policemen/women you could say -- I don't know if
 21 you call them policewomen -- who police animal
 22 experiments, for example when they inspect the Marshall
 23 MBR Acres, certain inspectors are paid for by Marshall?
 24 A. I would argue that it's not that simple. The Government
 25 requires organisations -- regulatory systems to be

133

1 funded not out of central taxation but by the sector
 2 that is being regulated in this case, and so it is true
 3 that the funding comes from that sector but it's not the
 4 case that that -- I mean, I think if you had the head of
 5 the Animal Science Regulation Unit here, they would
 6 strongly deny that there is any relationship between the
 7 funding they receive and the service that they provide.
 8 Q. Of course they would deny it, but it opens themselves to
 9 perhaps suspicion from people like me. I only found out
 10 about -- I've been involved with the anti-vivisection
 11 movement for 40 -- I found that out about a month ago.
 12 It never occurred to me. I was surprised to find that
 13 out.
 14 The Home Office, with any other animal matter --
 15 A. With any other animal ...?
 16 Q. With an animal welfare issue or anything to do with
 17 animals, farm animals, pets, zoos, circuses -- not that
 18 we have them now -- it would be DEFRA, wouldn't it, but
 19 when we're dealing with animal experiments it's the
 20 Home Office, and the Home Office, as we know, deal with
 21 the (inaudible), the courts, the police, the judiciary,
 22 terrorism, immigration. Why is it -- do you have any
 23 knowledge of why the Home Office --
 24 A. I don't know.
 25 Q. Why is it the Home Office?

134

1 A. I don't know. I think this is the Department of
 2 Justice, isn't it?
 3 Q. But we're dealing with animal experiments. It's
 4 peculiar, isn't it? Do you find it ...?
 5 A. I really don't have any information on that.
 6 Q. Okay. I just want you to confirm that. I haven't got
 7 too many more points.
 8 In your written evidence here, you give some
 9 figures, in paragraph 24, of a paper and it gives
 10 percentages of accuracy of dog to human NPV safety
 11 prediction. They're very, very high figures, aren't
 12 they?
 13 A. They are.
 14 Q. Extremely. Are you aware that there would be opposition
 15 in some quarters to this -- to the level of efficacy of
 16 these --
 17 A. The negative predicted values?
 18 Q. Yes. And there's another type of value that can be
 19 used, isn't there? LV, is it?
 20 A. There are lots of different ways of comparing, but the
 21 one that's used -- as I was explaining before, what you
 22 want is a lack of harm to the animal because this is the
 23 correlation -- these figures are the percentage
 24 correlations, that if you have a lack of harm to the
 25 animal, the percentage correlation likelihood that

135

1 you'll have a lack of harm to humans.
 2 Q. The judge, in his wisdom, refused to make this a trial
 3 about animal experiments so that's why we're just
 4 skirting over the surface. Are you aware that there are
 5 figures produced by researchers and doctors that would
 6 have a 96% failure rate? Are you aware? I'm just --
 7 there is opposition to -- this is not -- this is one
 8 study that you've put in.
 9 A. That's the IQ Consortium, yes. It's not me.
 10 Q. You're aware that these figures would be really
 11 questioned and scrutinised by many other researchers?
 12 A. I'm sure there are other ways -- people who would
 13 provide evidence from a different angle, yes.
 14 Q. Yes, and you're not an expert witness.
 15 A. No.
 16 Q. So this is something you've chosen and it's extremely --
 17 the highest figures I've ever seen.
 18 A. I've chosen it because it's used by the sector as the
 19 explanation of the correlation between a negative
 20 predicted -- well, a lack of evidence of harm in the
 21 dog.
 22 Q. It's not unchallenged science, is it, this?
 23 A. I would think -- well, I don't know, but I think that is
 24 the one that's used by this -- in this area.
 25 Q. Okay. Let's go on to the next paragraph.

136

1 "I should say for completeness that, in line with
 2 the above, researchers hope that the dogs undergoing the
 3 safety tests remain happy and healthy throughout the
 4 trials."

5 Are you happy with that statement?

6 A. Yes. As I said before, what you want -- the last thing
 7 you want is the dog to be made ill.

8 Q. Are we basing this on some -- I don't know. It's
 9 a wish, it's a hope? What about, say, for example,
 10 a dog in a year-long chronic toxicity test?

11 A. So --

12 Q. Are you aware --

13 A. Sorry, can you explain what that would mean?

14 Q. Okay, toxicity test then, the regulatory experiments
 15 that would be dealing with medicines, that would be
 16 dealing with the rodent and the non-dog, there's some
 17 sort of standards within the sector, isn't there, and
 18 there's 30-day studies -- 30-day toxicology studies
 19 are you aware of?

20 A. I don't know.

21 Q. Well, tell us about the toxicology studies that you know
 22 of, these regulatory experiments.

23 A. I'm not -- as I said, I'm not a toxicologist. I'm not
 24 quite sure how the study is designed --

25 Q. Some last a year. Would you accept that there are

1 year-long chronic toxicity tests?

2 A. I really don't know.

3 Q. Okay, even for a 30-day one, even for a five-day one,
 4 we're talking with perhaps -- the word "toxicity"
 5 itself -- I don't know why you wrote this because we're
 6 dealing with like --

7 MS BOLTON: Can I help Mr Curtin, possibly, because I think
 8 Mr Curtin has accepted that toxicity testing is to do
 9 with drug safety, so is he saying is Ms Jarrett aware of
 10 year-long trials involving drug safety with dogs? Is
 11 that what you're saying?

12 MR CURTIN: Yes, that's one of the things I'm --

13 MS BOLTON: I think that's what he means and I think the use
 14 of "toxicity" --

15 MR CURTIN: No, forget the year. It could be 30 days.

16 MS BOLTON: I think the use of "toxicity" is causing some
 17 confusion, so do you mean drug safety trials because --
 18 my Lord, I'll sit down. I'm just trying to help there
 19 because I think that's causing confusion.

20 MR CURTIN: All right, let's --

21 MR JUSTICE NICKLIN: Mr Curtin, just sketch out for me what
 22 point you're trying to put to the witness and let me see
 23 if I can help you.

24 MR CURTIN: If vivisection was on trial today, I could
 25 produce toxicology reports that by the end of it the

1 dogs are -- halfway through the experiment, sometimes
 2 they're put to sleep their suffering is so extreme. In
 3 this country they do put animals to sleep now once it
 4 goes beyond extreme suffering. But what would be
 5 standard at the end of a toxicology test, a high dose,
 6 would be animals vomiting, spasming, because they've had
 7 toxic products in them. They've had dangerous products.

8 MR JUSTICE NICKLIN: I think you're misunderstanding the
 9 name or the label "toxicity test". It's designed -- the
 10 purpose of testing it is designed to see whether it has
 11 an unexpected toxic reaction in the clinical study.
 12 It's not anticipated that it will.

13 MR CURTIN: In the toxicity test, as the witness here might
 14 be able to corroborate, you're not just giving normal
 15 doses, they're given massive doses, huge doses, that
 16 would never be taken --

17 MR JUSTICE NICKLIN: Mr Curtin, the problem with this
 18 questioning again -- I'm not necessarily criticising
 19 you. In fairness, Ms Jarrett has been called to give
 20 evidence and she does invite a degree of looking at
 21 areas that go well beyond the scope of this litigation.
 22 I cannot and do not -- in these proceedings I cannot
 23 make any sort of ruling. I simply don't have the
 24 evidence. I do not have the material to make any sort
 25 of finding as to whether or not the animal testing

1 regime in this country has any of the sort of
 2 consequences that you're suggesting. You haven't got
 3 the evidence to produce to me of that, the claimants
 4 haven't done so.

5 MR CURTIN: I haven't been allowed to.

6 MR JUSTICE NICKLIN: Well, because it's not relevant.

7 MR CURTIN: I keep meaning to --

8 MR JUSTICE NICKLIN: It goes back to the thing that I said
 9 on Monday, which is you don't have to prove in this
 10 country that you are right to protest about something.
 11 In many areas of protest, people are disagreed about
 12 what the right outcome for society would be, but we
 13 don't do it on the basis that the price of protesting is
 14 proving that you're right -- okay? -- and you don't have
 15 to prove that you are right about animal testing in this
 16 country to be able to demonstrate about it. That's an
 17 important right you have. But it's not part of my
 18 function -- my role here is to try and find the law's
 19 balance between those people who are protesting about
 20 what MBR Acres does and their right to go about their
 21 business, in accordance with the law, settled by
 22 Parliament. That's what this case is about. It's not
 23 about whether animal testing is right or wrong.

24 MR CURTIN: I was taking issue with the word "happy".
 25 I feel it's -- when you're talking the end result as an

1 animal that has been sickened, been poisoned --
 2 MR JUSTICE NICKLIN: Okay, I'm not going to be making any
 3 findings about that, Mr Curtin.
 4 MR CURTIN: Again, I don't know if we are going to come on
 5 to the same thing, but I feel this is a bit unfair, why
 6 you've been able to introduce this evidence.
 7 "Dogs can be easily trained from birth to be content
 8 in a laboratory environment [as read]."
 9 What do you mean by that?
 10 A. That was a reason as to why dogs are used as opposed to,
 11 say, pigs.
 12 Q. Expand, please.
 13 A. Well, we were talking earlier about the fact that the
 14 larger non-rodent species can be one of three -- usually
 15 one of three species, and this was a piece of
 16 information about why dogs have generally been used and
 17 it is because dogs are happier in a laboratory
 18 environment than pigs.
 19 Q. Who based -- where --
 20 A. From everything I've heard, talking to the animal care
 21 staff who look after different species in laboratories,
 22 they feel that dogs are better suited and have a better
 23 quality of life than other species.
 24 Q. I put it to you that's utter nonsense and offensive.
 25 A. Well --

141

1 MR JUSTICE NICKLIN: Mr Curtin.
 2 MR CURTIN: Oh, come on.
 3 MR JUSTICE NICKLIN: I don't have the time, more than
 4 anything, to investigate this. It's not the purpose of
 5 these proceedings.
 6 MR CURTIN: If I can't challenge it --
 7 MR JUSTICE NICKLIN: Well, it doesn't mean to say I'm going
 8 to -- as I told you on Monday, I asked Ms Bolton to what
 9 issue Ms Jarrett's evidence went to. Ms Bolton's answer
 10 was that she gives evidence as to what the detrimental
 11 effect on clinical research in this country would be if
 12 there were no longer a supply of beagles in order for
 13 animal testing to be carried out. That's the single bit
 14 of relevance it has to this case. That's it.
 15 MR CURTIN: Okay.
 16 You talk here, paragraph 29:
 17 "The United States. ... This has lead to
 18 a shortage of dogs for research in the United States and
 19 means that there are no animals available to be flown
 20 into the UK from the United States."
 21 29.1. Is that your statement?
 22 A. That's what I've heard from people involved in the
 23 industry, yes.
 24 Q. It's what you've heard, so it's hearsay?
 25 A. Well, it's my understanding that after the Envigo

142

1 facility shut, there was a necessary -- well, it was
 2 necessary for the dogs that would have been supplied by
 3 Envigo -- so, obviously, people order the animals that
 4 they need quite a long time in advance, so the other dog
 5 breeders in the US will have had contracts and orders
 6 that they have been fulfilling over the last few months
 7 from the orders they've had in already. But once the
 8 Envigo facility shut, that means that those customers
 9 that used to get their dogs from Envigo will have turned
 10 to those other dog breeders and will be taking up all
 11 the available stock that they have, probably -- I would
 12 imagine that would probably come in in sort of --
 13 I don't know -- the early -- around now really. But
 14 those re-orders -- the pre-orders will have been
 15 fulfilled, but now there's going to be a need for those
 16 dogs to stay in the US. That's my understanding.
 17 Q. Okay. What about if I was to put to you that the
 18 previous witness was presented with some evidence that
 19 Marshalls and Envigo, actually, are importing dogs into
 20 this country?
 21 A. I saw that. I saw that table and I believe that was
 22 actually last year and into maybe January or possibly
 23 February of this year.
 24 Q. Yes, so way after when Envigo was shut down. It's still
 25 happening.

143

1 A. But it doesn't contradict what I've just said, which
 2 is -- sorry.
 3 MS BOLTON: Can the witness have the table? (Handed)
 4 MR CURTIN: Let's just say there are no animals to be flown
 5 into the UK, would you accept that you might be wrong
 6 there -- well, you are wrong?
 7 A. Well, obviously it's possible that some animals might be
 8 flown in from other countries, but the way I've just
 9 explained it, that these will probably be orders that
 10 were on the books well before Envigo shut down.
 11 Q. That's what you think?
 12 A. Possibly.
 13 Q. 29.2, the same. We've got a similar fact about -- you
 14 base this on your gossip -- not gossip -- talk amongst
 15 the -- whoever you talk to.
 16 A. That's all I have.
 17 Q. And China.
 18 "China is struggling to get enough ..."
 19 You've just heard this from somebody?
 20 A. That's my understanding, yes.
 21 Q. Okay. So it's not really evidence, is it?
 22 And point number 30:
 23 "Therefore, the only real option for the supply of
 24 dogs for pre-clinical regulatory toxicology testing in
 25 the UK is MBR Acres."

144

1 Yes?
 2 A. MBR Acres is the only dog breeding facility in the UK.
 3 Q. Okay, that's if you chose to use dogs. We don't have to
 4 use dogs in this country, do we?
 5 A. Well, given as we were discussing earlier that the law
 6 requires that dogs are used ---
 7 Q. No, it does not. It requires two species ---
 8 MR JUSTICE NICKLIN: We've covered that. Mr Curtin, I know
 9 that that was an unfortunate --- I think Ms Jarrett will
 10 say, she's elided two answers that she gave earlier,
 11 which is the legal requirement is two species. There's
 12 not a legal requirement that one of them be dogs, but
 13 conventionally dogs are used because they have certain
 14 advantages from a clinical test perspective.
 15 MR CURTIN: Okay. Again, we go on.
 16 "Therefore, in simple terms, if MBR Acres were to
 17 cease supplying dogs for pre-clinical testing in the UK,
 18 the development of new medicine in the UK would be
 19 severely and adversely impacted and quite possibly
 20 curtailed [as read]."
 21 That's a strong statement, isn't it?
 22 A. Well, given that, if we want to continue to develop
 23 potential new medicines and then put them --- give them
 24 to human beings in clinical trials, volunteers in
 25 clinical trials, we are going to have to carry on doing

145

1 the required safety testing before that can happen, and,
 2 as we've discussed, dogs are involved in that. If there
 3 were no dogs available in the UK, then that research
 4 couldn't happen in the UK.
 5 Q. But aren't we talking about all these crazy new
 6 techniques that are coming thick and fast, aren't they?
 7 I've never witnessed myself such ... okay, forget I just
 8 said that. In America, the FDA Modernization Act,
 9 are you aware of that?
 10 A. Yes.
 11 Q. It takes away --- it actually takes away, doesn't it, the
 12 legal requirement?
 13 A. Well, there never --- there was always the option under
 14 the previous law in --- sorry, are you all right if
 15 I talk about this?
 16 MR JUSTICE NICKLIN: Yes.
 17 A. There was always the option for the FDA not to require
 18 animal tests, that was in the previous legislation, so
 19 it hasn't actually changed anything in the FDA
 20 Modernization Act.
 21 MR CURTIN: So the headlines all over the world that the FDA
 22 Modernization Act is what it says, modernising, getting
 23 ourselves into the 21st century and we don't have to
 24 test on animals anymore, it's your case, isn't it, for
 25 your group, "Yes, we have to test on animals", isn't it?

146

1 A. We're talking about the UK.
 2 Q. Yes.
 3 A. The FDA obviously is talking about the US.
 4 Q. Yes, it's talking about the UK, "We have to test on
 5 animals"?
 6 A. At the moment.
 7 Q. So this change that's going to come, how are we going to
 8 facilitate that change to come?
 9 A. Sorry, what change?
 10 Q. Getting rid of animal experiments. You're saying that
 11 we need animal experiments otherwise we can't get new
 12 medicines, but you're also saying you want to get rid of
 13 the same tests.
 14 A. Well, if we're going to get to that stage, then there
 15 are going to have to be a lot more non-animal
 16 methodologies brought through.
 17 Q. Are you aware of people in medical professions, doctors,
 18 experts, who make the claim --- I can't bring them here
 19 because we can't put vivisection on trial --- who would
 20 state that we can get rid of animal experiments today
 21 and we can implement all the new techniques that we've
 22 got? We would not --- are you aware that there is an
 23 argument that animal experiments not only could be got
 24 rid of but should be got rid of and it would improve
 25 medical research? Are you aware that other people hold

147

1 such a view?
 2 A. I'm certainly aware of --- obviously I'm aware of people
 3 who hold such views, but I think the question needs to
 4 be put to the regulators.
 5 Q. Yes, and the regulators, which we've seen --- even in the
 6 regulators, we've seen from this document, there's
 7 a move --- there is a move. The move is --- we're all on
 8 the same ship, aren't we, to move away from animal
 9 experiments, so that's good.
 10 A. I think the point is that we're not there yet. We're
 11 not there yet.
 12 Q. We're not there yet, and the way we will get there is
 13 ... okay. Let's show how we'll get there. We'll get
 14 there within the scientific community, with internally.
 15 Can I --- briefly before you gave evidence, we talked
 16 about the three Rs document that you're aware of. Do
 17 you remember?
 18 A. Yes, the Frances Rawle Report.
 19 Q. Yes, it's the latest report, isn't it? Hot off the
 20 presses, it's the latest three Rs report. Three Rs
 21 is ---
 22 A. Reduction, refinement and replacement of the use of
 23 animals in research.
 24 Q. So if I may read this out to you ---
 25 MR JUSTICE NICKLIN: Is this what you sent before lunchtime?

148

1 MR CURTIN: I'm getting worse. Not only the night before,
 2 this is like five minutes before. I sent it to
 3 Ms Bolton, with some discussion that it's not really
 4 contested as to its ...
 5 MR JUSTICE NICKLIN: I've got it, but the problem is the
 6 witness doesn't have it.
 7 MS BOLTON: I don't think it was not contested, my Lord.
 8 I think the point was the witness has done presentations
 9 on this paper so I think she can deal with any of the
 10 questions.
 11 A. I actually invited Frances Rawle to present on this
 12 paper to a meeting that I organised a couple of weeks
 13 ago.
 14 MR CURTIN: Good.
 15 MR JUSTICE NICKLIN: What is this document, Mr Curtin?
 16 MR CURTIN: It's the three Rs -- it's the latest document
 17 that they produced and it's -- these are brief --
 18 MR JUSTICE NICKLIN: Are you familiar with what he's
 19 referring to?
 20 A. Yes, I am.
 21 MR JUSTICE NICKLIN: Right. Can you tell me what it is?
 22 A. It's a review of the state of replacement, refinement,
 23 reduction in the UK at the moment and I think the
 24 overview was that we're very good at refinement, so
 25 we're very it good at making sure that the experiments

149

1 are done with the least possible harm to the animals and
 2 as much care taken as possible, we're pretty good at
 3 reduction, making sure that we use as few animals as
 4 possible to get the required results, but the area where
 5 there's still a need for more work is the replacement
 6 area, which I think Mr Curtin and --
 7 MR JUSTICE NICKLIN: Just tell me who has produced this
 8 report.
 9 A. It was written by -- is she a professor --
 10 Dr Frances Rawle, who used to work for the Medical
 11 Research Council as their head of research policy, and
 12 she's recently retired and was asked by the national
 13 centre for the three Rs to produce this report.
 14 MR JUSTICE NICKLIN: Right.
 15 MR CURTIN: If I may read it out to you. I'll read the
 16 first sentence and I'll stop there. It says:
 17 "On paper, the UK has a comprehensive review and
 18 regulatory framework for animal research [as read]."
 19 Yes?
 20 Now, do you know when you read this review -- when
 21 you read this report, were you -- I was personally
 22 struck by it, that they're accepting that things really
 23 do need to move on.
 24 A. I think everybody agrees with that.
 25 Q. And on paper it's saying here we've got policies, but --

150

1 in practicality, good, so there's a need for reform.
 2 I think that's it really -- that's all I wanted to say.
 3 That's it. That's the only bit I wanted to say.
 4 I don't have to read the rest of the thing. There's an
 5 acknowledgement that we need to move and do things.
 6 So one of the ways to do things is within the
 7 industry. Another thing would be to have protests,
 8 wouldn't it? That's another way of driving ...?
 9 A. I would disagree with that.
 10 Q. Why would you disagree with it?
 11 A. Because I think the industry -- the sector itself is
 12 working as hard as it possibly can to find alternatives
 13 to using animals in research for the very reasons that
 14 I state here, that nobody wants to use animals in
 15 research.
 16 Q. So the sector, the industry that has got this custom
 17 that amongst the -- we're talking extremely powerful
 18 vested interest, the Pfizers, the Glaxos and the
 19 Monsantos, are you're telling me that we should leave it
 20 to the industry and there doesn't need to be any
 21 protesting, it's all under hand? No?
 22 A. Well, I would say that all -- perhaps not all but the
 23 vast majority of non-animal methods that have been
 24 developed so far have been developed by the sector
 25 itself, so where these non-animal technologies are

151

1 coming from are from the universities, the
 2 pharmaceutical companies.
 3 Q. But not one single non-animal method has been validated
 4 yet, has it?
 5 A. No, plenty have. Many, many have.
 6 Q. They have not been validated. They have not.
 7 A. They have. They are used --
 8 MR JUSTICE NICKLIN: Mr Curtin, let the witness answer.
 9 MR CURTIN: Sorry.
 10 A. I mean, for instance, we used to have to test every
 11 single batch of shellfish that came through into this
 12 country for toxins that might kill people and we used to
 13 feed them to mice in order to do that, but now there is
 14 a validated non-animal alternative that the regulators
 15 accept so that mice don't have to be used in that test
 16 anymore. That's one example of hundreds of validated
 17 alternatives that are used.
 18 Q. In straightforward toxicity tests for medicine -- and
 19 you says it's medical research. It's the toxicity test,
 20 isn't it? It's not carried out at university with some
 21 professor finding out what happens. It's a toxicity
 22 test. Would you agree with me that the actual toxicity
 23 test hasn't changed since the Helsinki agreement?
 24 A. No, I would disagree with that. It has changed
 25 enormously. So what you would now have -- at the very

152

1 start , you would put the chemical formula of your new
 2 molecule into a computer -- sorry, I don't have the
 3 technical term of how you would do that -- but that
 4 would be screened by computers and any potential
 5 toxicity that the computer thinks might be made by that
 6 molecule, it will alert -- you know, it will report. So
 7 that's the first -- then at that stage you would then
 8 say -- scientists would say, "Okay, so it may have
 9 toxicity in liver cells so we'll put it into some liver
 10 cells and see whether it does something bad to the liver
 11 cells", and if it does, then that confirms what the
 12 computer said.

13 As we were saying before, you've got this whole
 14 process of the computers, the cell cultures, the
 15 organoids, the livers on chips. The new, most recent
 16 things are working organs on chips which -- in
 17 miniature, which is absolutely fantastic. There's
 18 a lung on a chip which has the blood supply and the
 19 airway and they come together, and because it moves and
 20 you can put something into the blood supply and see
 21 whether it comes into the airway or you can put it into
 22 the airway and see if it will move into the blood
 23 supply, there's no need to use a living being at all .
 24 Fantastic. Being used in lots of ways to test inhaled
 25 drugs at the early stage. But what you then can't do is

1 see whether it damaged the brain or the kidney or the
 2 spleen or the skin. So there's lots of validated
 3 alternatives that are being used at various different
 4 points and on that pathway.

5 Q. But at the end of the process it's the dog toxicity
 6 tests that happen --

7 A. Yes, that was the final stage.

8 Q. In every single medicine, there is not one single
 9 replacement yet?

10 A. I have just said there were lots of replacements.

11 Q. That was to do with the shellfish. I'm talking about
 12 getting a medicine on to the market. There is no
 13 non-animal methods that are being deployed without the
 14 80-year-old practice of doing it on the dog as well.

15 A. I think I just explained there are lots of stages along
 16 the way where non-animal methods are used and at each
 17 stage, you know, various potential medicines will be
 18 kicked out because they didn't pass those tests, so
 19 there are non-animal methods used before you get
 20 anywhere near using an animal.

21 Q. But all -- every single medicine will be tested on
 22 a dog -- whatever the report says, whatever the
 23 non-animal (overspeaking - inaudible).

24 A. Because the law requires it. That's been established
 25 quite early on, yes.

1 Q. It's not part of the Helsinki agreement that you have to
 2 use the technology -- the chip or the computer model,
 3 but you have to still use the dog.

4 A. What it requires -- I think what it says -- sorry, I'll
 5 go back to it because it does say what's required. So
 6 paragraph 9:
 7 "Biomedical research involving human subjects must
 8 conform to generally accepted scientific principles and
 9 should be based on adequately performed laboratory and
 10 animal experimentation and on a thorough ..."
 11 So it does allow for the non-animal experimentation.

12 Q. But that's not the case in this country.

13 A. It is the case in this country.

14 Q. Why, then, are there 4,000 toxicology experiments?

15 A. Because, as we've discussed, that's the very last stage.
 16 If we didn't have all those other non-animal
 17 alternatives, there would be hundreds more dogs used
 18 every year, thousands.

19 Q. Vivisection here is not on trial. The judge has not
 20 allowed it. Your organisation or you personally -- at
 21 the beginning I said you're a lobby group for the
 22 industry that uses animals. You used to go under
 23 a different name. You changed your name, didn't you?

24 A. We were formed of two different organisations that
 25 existed before and we merged those two organisations and

1 came up with a new name that actually said on the tin
 2 what we did.

3 Q. And it's to defend animal experiments, isn't it? We
 4 need them, don't we, according to you?

5 A. The word that we lost was "defence". We deliberately
 6 didn't have that in and we used "understanding" instead.
 7 We don't ask -- we don't defend. We ask people to
 8 understand why and how animals are used in research.

9 Q. Has your organisation ever criticised a single animal
 10 experiment that you know of?

11 A. We were very critical about a couple of cases of --
 12 well, there's two examples. I'll come back to the
 13 second one. We were very critical of two animal
 14 facilities in Europe that were closed down because they
 15 had very, very bad welfare practices and we were very
 16 critical of those two. We had statements on our website
 17 about that.

18 The other area where we've said that we don't think
 19 animals should be used is in one of the ways that the
 20 forced swim test is used currently, which is where
 21 rodents are put into a tank of water that they can't
 22 escape from, and it should be used and is used very
 23 successfully to screen potential anti-depressants. But
 24 where it's wrongly used is as a model of depression
 25 because it simply can't recapitulate what human

1 depression is and we've stated that we don't think it
 2 should be used in that area, in that example.
 3 Q. But the number of animal experiments in this country
 4 runs into millions, doesn't it, and it's the role of
 5 your organisation to defend those experiments?
 6 A. It's our role to explain and help people understand why
 7 those experiments happen.
 8 Q. Okay. Just come to your last paragraph here:
 9 "Many in the research industry have real concerns
 10 about importing dogs from outside the UK both from the
 11 point of view of impact of travel ... [as read]"
 12 But you've now heard that we're still -- we do
 13 import dogs into this country for --
 14 A. What I saw was that there were dogs that were imported
 15 from the US to Denmark.
 16 Q. That was a transit. If you look at the document, it was
 17 a transit point and they actually -- they went to
 18 contract testing laboratories, Charles River.
 19 A. So I think what I'm saying there is we would prefer
 20 that, if animals are used in research in the UK, that
 21 they have a short journey from where they're bred to
 22 where they're being used in research and it's preferable
 23 on animal welfare grounds that they don't have to make
 24 long journeys by air.
 25 Q. Okay, I think we're finished. Basically just to sum up,

1 I called you a lobby group which you didn't argue with.
 2 A. I did argue with it actually.
 3 Q. Well, go on then.
 4 MR JUSTICE NICKLIN: Mr Curtin, no, we're not doing it
 5 again. It's a point you can make in submission. It's
 6 your characterisation of the work that they do; okay?
 7 It's a judgment, it's a value judgment, Mr Curtin, and
 8 it's not something I'm going to be making a finding
 9 about, so ...
 10 MR CURTIN: And your idea within the sector is that all the
 11 protesters, all the media coverage that's happened,
 12 Harry and Megan having a beagle, we can all just go home
 13 and relax, it's all sorted, the sector are on the case
 14 and animal experiments will be a thing of -- will be
 15 assigned to the history books one day, without any more
 16 protesting; is that your case?
 17 A. I think what I said was I didn't think protesting helped
 18 move --
 19 MR JUSTICE NICKLIN: When you say "protesting", what do you
 20 mean by that because I think -- we need to be clear
 21 because protesting can range from people writing to
 22 their MPs, people marching down a street or marching to
 23 Parliament Square --
 24 A. Yes.
 25 MR JUSTICE NICKLIN: -- protesting by signing petitions,

1 things like that. There is obviously a spectrum and
 2 right at the other end of the spectrum are those who use
 3 violence towards those who are engaged in clinical
 4 research involving animals, so there's a wide spectrum
 5 of protest activity. Now, I can see that, when you get
 6 to the more extreme end, that protest could be
 7 characterised as being harmful and counter-productive,
 8 but I'm not sure that you're suggesting that people who
 9 write to their MPs and say, "Really, we need to be
 10 looking -- we need to keep the pressure on those who are
 11 responsible for animals to come up with new and to have
 12 innovative ..." -- there's a degree to which that sort
 13 of protest pressure could be said to be productive and
 14 healthy in a democracy.
 15 A. Can I answer that in two ways?
 16 MR JUSTICE NICKLIN: Yes.
 17 A. Firstly, I don't characterise the activities that have
 18 been alleged to happen outside MBR Acres and the
 19 intimidation and harassment as staff as protest.
 20 I would class that as activism or extremism. So when
 21 asked about protest, I agree with you that we are
 22 fortunate to live in a democracy and protest is part of
 23 democracy and I welcome -- I wouldn't have a job if
 24 people didn't disagree with the use of animals in
 25 research, so I accept that.

1 But I think the point I was trying to make was
 2 that -- I obviously haven't been able to get it across
 3 strongly enough, but the sector wants to find ways not
 4 to have to use animals and the impetus for finding
 5 better ways, new ways, alternative ways, of using
 6 animals in research comes from within the sector, and if
 7 there were no protests -- if all forms of protest
 8 stopped tomorrow around animal research, that impetus
 9 would not slow down. It's going as fast as the science
 10 will let it and everybody wants to find alternatives to
 11 use of animals.
 12 Obviously everybody is entitled to their opinion and
 13 there's no way that I would suggest that protests
 14 shouldn't happen. I would suggest that activism
 15 shouldn't happen or illegal activism shouldn't happen.
 16 But the point I was trying to get across was I don't
 17 think it's the protesters that are driving the creation
 18 of alternatives because it's the scientists themselves,
 19 the research sector itself, that is doing that and wants
 20 to do it and wants to do it at speed.
 21 MR CURTIN: But with the Research Defence Society, it's like
 22 100 years old, isn't it? It was formed in --
 23 A. The Research Defence Society was formed in 1908.
 24 Q. And it formed at the same time as the anti-vivisection
 25 movement exploded?

1 A. Should we explain what we're talking about?
 2 Q. Mushroomed. Pardon?
 3 MR JUSTICE NICKLIN: Well, I've worked out that it's one of
 4 the two organisations.
 5 A. Yes.
 6 MR CURTIN: So opposition is vital, I put to you, and
 7 protesting. People used to protest on the streets of
 8 London 100 years ago, the little brown dog affair,
 9 you're aware of that.
 10 So I think we can finish this very simply that
 11 I defend the right to protest.
 12 A. Absolutely.
 13 Q. And there are people in this country that are not
 14 prepared to hand it over to the sector, full of its
 15 vested interest, its customs, it's "This is the way
 16 we've done it". We need — these dogs are dying today
 17 and you've talked about all these new techniques. So
 18 thank God for protesting, I'd say, and thank God for
 19 pressure. There's a case where animal experiments —
 20 it's not — it needs looking at.
 21 A. And I would suggest that it is looked at a lot. Of all
 22 areas of science, it's the one that's probably under the
 23 most scrutiny day in day out. And all the
 24 legislature — the ASPA that you mentioned, within that,
 25 the requirement to show that you have — you can justify

161

1 why you have to use an animal is baked into the
 2 legislation. You cannot use an animal in this
 3 country — it's illegal to use an animal in this country
 4 if there's an alternative.
 5 Q. But the three Rs are saying, on paper, that, "This needs
 6 to move now, this has to change. The grand talking has
 7 got to stop, we need action".
 8 A. I think we would agree on that.
 9 MR CURTIN: Good. Okay. I'll sit down.
 10 MR JUSTICE NICKLIN: Right. Ms Jaffray.
 11 MS JAFFRAY: Okay, I don't have anything to add to what
 12 Mr Curtin has done. He's far more knowledgeable than
 13 me. I'm horrified that animals are being spoken about
 14 like this. There's just one point I wanted to make.
 15 Activism is not extremism.
 16 MR JUSTICE NICKLIN: Well, it's all about classification of
 17 terms, Ms Jaffray. I appreciate that people may take
 18 a different view of where the boundaries are between
 19 protests and activism and between activism and
 20 extremism. But, happily, I don't have to draw those
 21 lines in these proceedings. I just have to decide
 22 whether what has taken place is a breach of the civil
 23 law and, if so, what the court's response to that is
 24 going to be. Those are the issues in the case for me.
 25 MS JAFFRAY: Okay. That's fine. That's fine. I'm going to

162

1 leave it with what Mr Curtin said. He asked everything,
 2 made every point possible.
 3 MR JUSTICE NICKLIN: That's very good. Thank you very much,
 4 Ms Jaffray.
 5 MS JAFFRAY: Okay.
 6 MS BOLTON: My Lord, no re-examination.
 7 MR JUSTICE NICKLIN: Right.
 8 Ms Jarrett, thank you very much for coming to give
 9 your evidence. You're very welcome to stay but equally
 10 I suspect you have other things that you need to be
 11 getting on with. Thank you very much.
 12 A. Thank you.
 13 MR JUSTICE NICKLIN: Sorry, I had one question, let me go
 14 back to it. Which was, in the final paragraph of your
 15 statement — no, the penultimate paragraph, you said:
 16 "Therefore, in simple terms, if MBR Acres were to
 17 cease supplying dogs for pre-clinical testing in the UK,
 18 development of medicine in the UK would be severely and
 19 adversely impacted, and quite possibly curtailed."
 20 Am I right in thinking that would depend on whether
 21 a new supplier entered the market? So if another
 22 supplier entered the market and supplied the dogs, then
 23 it wouldn't have — it's not that MBR are producing
 24 a specific variety of dog that only MBR can produce?
 25 A. Well, there is an aspect — I think you touched on it

163

1 earlier about the Marshall beagle versus other beagles
 2 and the fact that companies like to use the same strain
 3 of animal.
 4 MR JUSTICE NICKLIN: Right.
 5 A. But, no, if another dog breeder wanted to come into the
 6 UK and obtain planning permission for a dog breeding
 7 facility and build it and set it up and get it licensed
 8 by the Home Office, and start to buy in animals, if they
 9 could, from somewhere else in the world, if someone were
 10 prepared to sell them surplus animals to start-up
 11 another breeding facility, in theory it could happen.
 12 In practice, I think it would be extremely difficult for
 13 that to happen.
 14 MR JUSTICE NICKLIN: Right. Thank you very much.
 15 A. Thank you.
 16 (The witness withdrew)
 17 MR JUSTICE NICKLIN: Right, that's it for today, isn't it?
 18 MS BOLTON: My Lord, it is. My Lord, can I just flag,
 19 I appreciate that Ms Jaffray is going to go away
 20 overnight and have a think about what she wanted to do.
 21 It doesn't need to be here tomorrow morning but if
 22 potentially by the end of tomorrow at least, if she is
 23 going to proceed, we still haven't seen her evidence or
 24 her report. So if she could just remember that we do
 25 need to see that at some point because we've got to prep

164

1 our questions, if she's going to give evidence. If
 2 she's not, then obviously she doesn't need to worry
 3 about it but I just flag it so it doesn't slide, so we
 4 get closer and closer to her giving oral evidence.
 5 MR JUSTICE NICKLIN: Right. Thank you, everybody. See you
 6 tomorrow at 10.30.

7 (4.08 pm)

8 (The hearing adjourned until
 9 Friday, 28 April 2023 at 10.30 am)

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

165

INDEX

1
2
3 MS SUSAN PRESSICK (sworn)8
4
5 Examination—in—chief by MS BOLTON9
6
7 Cross—examination by MR CURTIN15
8
9 Cross—examination by MS JAFFRAY91
10
11 Further cross—examination by MR CURTIN109
12
13 MS WENDY JARRETT (affirmed)113
14
15 Examination—in—chief by MS BOLTON113
16
17 Cross—examination by MR CURTIN114
18
19
20
21
22
23
24
25

166

167

A	<p>advantages (1) 145:14 adverse (1) 126:11 adversely (2) 145:19 163:19 advice (1) 2:17 advocacy (1) 114:16 advocate (2) 29:18,22 advocates (1) 44:13 affair (1) 161:8 affected (1) 67:13 affirmed (2) 113:2 166:13 afraid (1) 103:11 after (12) 15:15 34:20 56:22 72:2 90:21 91:2 132:9 133:5,6 141:21 142:25 143:24 afternoon (1) 113:8 afterwards (1) 65:11 again (18) 7:24 13:25 14:11 24:24 39:23 41:6 54:25 67:14,24 69:13 75:15 77:25 86:10 110:22 139:18 141:4 145:15 158:5 against (7) 16:7 36:11,14 48:17 50:14 67:21 95:21 ago (11) 5:20 15:9 45:13,16 82:10,11,15,18 134:11 149:13 161:8 agree (12) 3:14 58:23 64:14 78:12 97:1 105:18 129:4 131:13,14 152:22 159:21 162:8 agreed (1) 122:22 agreement (3) 124:23 152:23 155:1 agrees (2) 56:16 150:24 ah (3) 21:5 116:2,3 ahead (2) 53:2 126:21 air (1) 157:24 airway (3) 153:19,21,22 albeit (1) 19:13 alert (2) 76:16 153:6 aligned (1) 81:4 allegation (1) 39:8 allegations (2) 48:14 98:6 alleged (4) 48:16 50:14 93:3 159:18 allow (3) 33:23 101:16 155:11 allowed (5) 31:3 72:10 131:7 140:5 155:20 allowing (2) 58:18 59:12 allows (1) 106:24 almost (2) 71:23 122:14 alone (4) 41:12 83:8,11 129:15 along (5) 57:24 77:20 95:5 97:4 154:15 already (7) 50:22 60:12 83:1 85:17 108:19 113:14 143:7 also (12) 15:25 17:15 32:18 49:19 63:11 68:4 78:1 111:17 125:8 126:25 131:24 147:12 alternative (5) 118:5 129:6 152:14 160:5 162:4 alternatives (7) 131:21 151:12 152:17 154:3 155:17 160:10,18 although (2) 92:25 93:8 always (7) 42:3 59:11 71:10,14 89:25 146:13,17 amended (3) 116:14 117:13 118:1 america (5) 41:17 86:12 110:12,13 146:8 american (4) 35:22 43:3 44:6 47:4 amongst (3) 125:10 144:14 151:17 amount (4) 1:16 87:5,18 93:25 amounts (1) 13:2 amplify (1) 52:10 anaesthesia (1) 69:9 analysing (1) 50:22 angle (1) 136:13</p>	<p>anglia (1) 59:8 animal (74) 24:25 52:7 86:3,3 89:2,11,19 90:24 91:2 99:18,25,25 103:8 109:16 113:12 114:11,12,13,16 118:14 122:15,16,23 124:11 126:1,15 127:23 128:3,12,14,18 129:10 130:9,12,15 131:12 133:8,21 134:5,14,15,16,19 135:3,22,25 136:3 139:25 140:15,23 141:1,20 142:13 146:18 147:10,11,20,23 148:8 150:18 154:20 155:10 156:3,9,13 157:3,23 158:14 160:8 161:19 162:1,2,3 164:3 animals (74) 20:25 21:13,14,16 24:15 37:21,22 38:1 63:7,9,10 77:7 96:2,4 97:1 114:21,25 117:20,25 118:2,3,10 119:1 122:21 123:13 124:15 125:3,11,12,13 126:5,9,13 128:6 129:2,3,5,8,15 130:19 131:4,21,23,24,25 134:17,17 139:3,6 142:19 143:3 144:4,7 146:24,25 147:5 148:23 150:1,3 151:13,14 155:22 156:8,19 157:20 159:4,11,24 160:4,6,11 162:13 164:8,10 announce (1) 111:17 annoys (1) 79:15 another (23) 17:24 19:4 24:22 25:7 35:6 55:14 77:20,21 85:15,16 86:22 98:10 106:16 107:6,8 118:14 121:20 135:18 151:7,8 163:21 164:5,11 answer (35) 15:20 24:24 28:4,7 30:2 33:24 35:8 36:1 46:8 50:15,20 53:1,4,5,15 54:24 60:6 63:20 64:20 65:15 68:13 90:6 95:11 97:3 98:25 99:8 102:9 107:13 110:3 118:6 128:10 130:1 142:9 152:8 159:15 answerable (1) 46:25 answered (5) 22:12 60:12 111:12 118:13,18 66:8 (3) 13:19 106:12 126:7 answers (6) 24:4 28:8 65:10 72:14 83:17 145:10 antagonise (1) 96:11 anticipated (1) 139:12 antidepressants (1) 156:23 antivivisection (2) 134:10 160:24 anxious (1) 78:1 anybody (3) 84:23 130:11,14 anymore (10) 46:1 78:17,21 79:4 81:24 82:14 93:2 109:25 146:24 152:16 anyone (3) 63:3 80:18 106:20 anything (14) 4:9 7:1 53:10,12 54:5 55:13 65:18 80:12 85:9 107:21 134:16 142:4 146:19 162:11 anyway (5) 84:10 95:3 97:14 102:18 119:8 anywhere (4) 34:24 59:16 60:25 154:20 apart (3) 35:23 59:7 77:1 apologies (2) 7:14 23:13 apologise (5) 6:18 33:1 41:25 55:1 128:11 apology (2) 6:18,19 apparent (4) 3:18,24 44:15</p>	<p>64:22 appeals (5) 27:9,16 28:1 33:19 35:18 appear (3) 12:12 29:3 80:4 appears (1) 12:4 application (9) 25:18 27:2 30:1 34:18,22 35:3,4,6 88:16 applications (3) 27:3 29:6 111:8 applied (1) 34:22 apply (2) 49:11 129:16 appreciate (5) 23:1 41:3 70:15 162:17 164:19 approach (2) 50:12 66:14 approaching (1) 92:16 appropriate (1) 30:15 approval (2) 122:17 126:21 approved (2) 108:23 133:2 approximately (2) 26:21 82:18 april (2) 1:1 165:9 area (2) 110:14,15 ares (9) 17:16 35:15 109:21 131:16 136:24 150:4,6 156:18 157:2 areas (4) 84:16 139:21 140:11 161:22 arent (9) 8:13 63:11 68:6 116:16 121:18 135:11 146:5,6 148:8 argue (3) 133:24 158:1,2 argument (1) 147:23 arise (1) 28:24 arises (4) 6:14 23:3 63:20 106:20 around (16) 12:12 26:3 35:9 69:13 73:8 78:16 81:15,18 82:13 83:2 111:2 120:5 123:22,22 143:13 160:8 arrangements (1) 88:25 arrive (1) 93:1 arrived (1) 108:17 article (9) 26:13 27:13 28:13 29:3 30:4,18 32:5 120:17 128:5 articles (3) 5:23 6:5 26:10 aside (3) 13:17,19 44:3 ask (60) 4:16,18 6:15 8:7,12 10:2,19 15:17,18 17:12 20:19,20 26:14 27:10,22 28:22 29:23 33:18 38:19 40:15,21 41:11 44:15 45:19 46:2 47:2 48:4 49:9,10 52:3 58:16 63:19 66:8,23 67:8 68:12 75:15 79:13 80:6 84:11,12,13 86:23 90:3,17,19 91:9,24 97:25 98:13 99:1,9 105:4 107:14 109:7,11 113:17 120:20 156:7,7 asked (17) 22:19 29:5 31:1,10 32:23 46:10 53:8 60:4 66:15 106:5 130:7 132:6,20 142:8 150:12 159:21 163:1 asking (26) 3:7 12:22 21:5,8,23,25 22:10,23 23:3 28:12 31:5 32:20 37:17 40:6,13 41:24 53:9 62:6 64:19 65:19 66:10 70:4 90:4 109:18 119:11 132:9 asks (3) 4:9 66:23 67:2 aspa (8) 24:14 88:14,18 89:5 117:18 118:7 119:3 161:24 aspect (2) 77:1 163:25 assault (3) 92:13,13,16 assaults (5) 91:14,22,25 92:1,10 assembly (3) 116:13,14 117:14 assessed (1) 82:19 assigned (1) 158:15 assist (1) 17:15 assistance (1) 98:14 assisting (1) 99:2</p>	<p>association (2) 116:14 117:14 assuming (1) 12:14 attached (1) 6:19 attention (2) 56:21 121:1 attributable (2) 100:15,16 august (1) 13:11 augustseptember (1) 12:19 authorities (1) 111:8 authority (9) 16:9,10,12,14,22 36:17 47:3 122:19 123:8 available (6) 24:23 87:7 118:5 142:19 143:11 146:3 aware (72) 3:15 16:3 24:14,23 25:5,7,10 29:12 34:22,25 39:4 42:1,2 46:4 52:6,7 75:19 76:7,16 77:1 83:22,24,24 85:15 86:11,12,13,22 87:19,22 89:18,19,22 92:1,6 93:20,22 94:9 99:6 101:18,20 102:6,11,22,23 103:1 17:16 35:15 109:21 131:16 136:24 150:4,6 156:18 157:2 areas (4) 84:16 139:21 140:11 161:22 arent (9) 8:13 63:11 68:6 116:16 121:18 135:11 146:5,6 148:8 argue (3) 133:24 158:1,2 argument (1) 147:23 arise (1) 28:24 arises (4) 6:14 23:3 63:20 106:20 around (16) 12:12 26:3 35:9 69:13 73:8 78:16 81:15,18 82:13 83:2 111:2 120:5 123:22,22 143:13 160:8 arrangements (1) 88:25 arrive (1) 93:1 arrived (1) 108:17 article (9) 26:13 27:13 28:13 29:3 30:4,18 32:5 120:17 128:5 articles (3) 5:23 6:5 26:10 aside (3) 13:17,19 44:3 ask (60) 4:16,18 6:15 8:7,12 10:2,19 15:17,18 17:12 20:19,20 26:14 27:10,22 28:22 29:23 33:18 38:19 40:15,21 41:11 44:15 45:19 46:2 47:2 48:4 49:9,10 52:3 58:16 63:19 66:8,23 67:8 68:12 75:15 79:13 80:6 84:11,12,13 86:23 90:3,17,19 91:9,24 97:25 98:13 99:1,9 105:4 107:14 109:7,11 113:17 120:20 156:7,7 asked (17) 22:19 29:5 31:1,10 32:23 46:10 53:8 60:4 66:15 106:5 130:7 132:6,20 142:8 150:12 159:21 163:1 asking (26) 3:7 12:22 21:5,8,23,25 22:10,23 23:3 28:12 31:5 32:20 37:17 40:6,13 41:24 53:9 62:6 64:19 65:19 66:10 70:4 90:4 109:18 119:11 132:9 asks (3) 4:9 66:23 67:2 aspa (8) 24:14 88:14,18 89:5 117:18 118:7 119:3 161:24 aspect (2) 77:1 163:25 assault (3) 92:13,13,16 assaults (5) 91:14,22,25 92:1,10 assembly (3) 116:13,14 117:14 assessed (1) 82:19 assigned (1) 158:15 assist (1) 17:15 assistance (1) 98:14 assisting (1) 99:2</p>	<p>bedding (1) 76:20 before (46) 8:4 12:19 19:24 23:18,22 29:11 30:8 37:8 42:2 47:21 52:3,16 54:13 56:22,23 57:15 70:25 73:7 75:13,13 84:14,20 87:13 93:15 108:17 109:13 110:13 111:3,24 112:16 118:23 121:6 124:24 125:25 128:3 135:21 137:6 144:10 146:1 148:15,25 149:1,2 153:13 154:19 155:25 beforehand (1) 8:15 began (1) 89:16 begin (4) 35:10,11 78:24,25 beginning (5) 10:8 12:7 36:6 106:1 155:21 behalf (9) 16:9,12,14,16,22 19:1,3 36:17 114:18 behaving (1) 107:19 being (76) 12:4,8 16:25 18:14 22:18 27:8 29:2,2,5,21 30:7,24 31:1,4,10,21 32:21,23 33:17 34:4 35:3 39:14 40:11,14,16,18,19 41:4,6,7 42:2 46:6 48:16 55:16 58:11 60:7 62:7,8,13 63:5 68:5 72:20 73:16 78:5 80:11,13,24 83:21 86:19 87:20 91:23 92:4,4,6 94:21 95:2,16 96:6,9 98:5,9 100:4 102:21 104:6,24 109:5 126:17 134:2 153:23,24 154:3,13 157:22 159:7 162:13 beings (2) 129:7 145:24 belief (4) 10:17 41:7 69:23 114:2 beliefs (2) 36:12 66:4 believe (8) 9:18 10:22 48:6 56:10 87:13 114:3 119:11 143:21 benefit (1) 2:17 best (6) 2:12 8:15 10:16 66:1 82:7 114:2 better (7) 97:21 107:14 128:25 129:2 141:22,22 160:5 between (14) 14:8 19:12 88:3 92:24 93:7 94:22 96:25 110:13 127:17 134:6 136:19 140:19 162:18,19 beyond (2) 139:4,21 big (1) 9:3 bigger (2) 14:22 82:23 biggest (2) 96:21,23 biomedical (1) 155:7 bioresources (6) 18:8 115:3 129:10,17,23 130:13 birth (1) 141:7 bit (12) 5:17 17:14 18:3 27:6 39:7,7 57:9 120:4 125:8 141:5 142:13 151:3 bk (27) 6:3 9:8 15:25 16:1,20 17:25 18:9,10,12,20 19:10,22 25:16,18 30:1 34:4,10,11 37:7,20,21,22 76:24 101:7 106:15 111:13,18 bled (5) 63:11,14,14 69:12 71:6 bleed (1) 71:10 bleeding (9) 63:10,12,17 69:5,9,10,11 70:25 71:2 block (2) 58:20 101:16 blockade (2) 94:14,15 blocked (1) 101:23 blocking (5) 58:18,24 59:5,11,17 blood (8) 63:13 68:18 17:8,9,10 153:18,20,22 blue (1) 121:2 body (2) 131:15 133:8 bolton (133) 1:7 2:2,21</p>	<p>3:5,11,19,21 4:1 5:13,14 6:8,9,22 7:6,13 8:20,21 9:5,6,15 10:5,8,10 11:2,6 12:22 15:2,19 17:5,15 20:16,21 22:3,12,18 23:1,7,13 25:24 26:5 27:8,11,15,19 28:10,16,18 29:1,10,12 30:6,15,23 31:16,21 32:1,5,9,18,23,25 33:1 37:11 38:22,24 39:16,21,25 40:6,10,12 43:17,18,23 44:9,11,19,24 47:11,13 48:22 52:14 56:14 58:5,8,10 63:19,23,25 64:11,17 65:1,4,17 66:8,17,20 67:11,25 68:9 73:21 84:10,12 98:8 106:3,7,22 112:4,15,21,22 113:7,8 114:4 120:10,21 121:8,13,20,24 128:10 129:1 138:7,13,16 142:8 144:3 149:3,7 163:6 164:18 166:5,15 boltons (1) 142:9 books (2) 144:10 158:15 born (1) 69:22 boss (2) 19:3 86:14 both (5) 5:21 83:24 90:25 96:17 157:10 bought (2) 26:17 45:5 boundaries (3) 119:14 123:1,1 boundary (1) 162:18 box (1) 24:9 brackets (1) 130:5 brain (1) 154:1 brand (1) 18:16 breach (1) 162:22 breaching (1) 40:25 break (9) 29:8 47:15 48:12,21 49:6,11 51:2 112:15,19 breakin (1) 91:1 breaking (1) 90:2 breakins (3) 89:22 90:18 103:23 bred (4) 37:21,22,23 157:21 breed (15) 11:15 20:13 21:13,16 42:7,9 43:3,13,14 44:9 63:7,9 72:1 86:25 130:18 breeder (3) 25:1 85:16 164:5 breeders (3) 114:24 143:5,10 breeding (19) 13:3 14:23 25:2 26:24,24,25 31:13 34:19 35:5,13 38:1,2 46:7 72:3 73:13 111:6 145:2 164:6,11 breeds (1) 24:21 brief (1) 149:17 briefly (2) 52:4 148:15 brilliant (1) 128:22 bring (3) 54:22 125:16 147:18 british (1) 114:23 broadly (1) 4:22 brochures (1) 98:5 broke (2) 89:20 90:22 brought (2) 125:1 147:16 brown (1) 161:8 build (2) 111:6 164:7 building (5) 77:20 79:24,25 80:1,4 buildings (7) 27:2 74:15 75:1,20 80:2 96:16,25 bundle (10) 7:14 9:12,16,18 10:4,8 52:23 112:25 113:13 120:6 bundles (2) 9:10 10:6 business (28) 12:19 19:20 43:1,2,3,3,10,20 44:22 66:11 71:7 74:17 75:6,7,16,18 77:1 96:2 104:19 105:9 106:23 107:8 110:14 130:2,3,13,20</p>
----------	---	---	---	---	---	---

140:21
buy (1) 164:8

C

c5 (1) 117:24
call (10) 5:14 8:21 26:24
27:6 34:19 63:2 102:17
112:22 114:17 133:21
called (16) 30:8 42:14
62:13,22 63:5,22 69:11
72:19,20 113:11 114:8
116:22 129:16 133:8
139:19 158:1
calling (3) 15:16 64:23 73:1
calls (2) 37:9,19
calm (1) 22:3
calmed (1) 109:6
calmer (1) 93:5
calmly (1) 5:4
calmness (1) 93:6
came (9) 39:1 45:6,7
89:9,11,20 109:4 152:11
156:1
camera (2) 39:11 40:7
camp (5) 61:9,12 87:23
102:11 109:5
campaign (1) 96:23
cancer (1) 114:23
cannot (8) 24:22 44:12
46:20 59:18 118:11
139:22,22 162:2
cant (19) 3:10 24:4 36:4
45:15 75:23,23 84:14
95:15 101:5 102:16 105:21
119:11 142:6 147:11,18,19
153:25 156:21,25
canteen (1) 53:24
capacity (4) 19:2 42:15,16
131:10
capture (1) 53:9
captured (1) 54:15
car (9) 79:14 93:15 94:2
104:2 105:2 106:17
107:9,10,11
care (2) 141:20 150:2
career (2) 114:10 119:9
careful (2) 48:14 65:17
caring (1) 41:1
carried (4) 54:8 124:10
142:13 152:20
carry (11) 2:3 6:9 16:16
21:1,3 43:20 78:16 100:17
101:5 130:10 145:25
carrying (2) 42:19 68:18
cars (27) 91:23
92:4,6,17,18,19 93:8 94:21
103:25
104:4,8,13,14,14,18,20,21,21,24
105:5,12,19,22,25 106:19
107:3,5
cart (1) 77:20
carts (1) 77:9
cases (3) 78:13 129:2 156:11
cast (1) 30:25
category (1) 47:21
cats (2) 24:17 118:9
causing (2) 138:16,19
cease (2) 145:17 163:17
cell (3) 126:2 128:14 153:14
cells (4) 127:22 153:9,10,11
central (1) 134:1
centre (6) 43:15 45:10,12
131:22 132:1 150:13
centres (1) 45:1
century (2) 131:17 146:23
cephalopods (1) 118:3
certain (7) 42:5 85:12 90:13
124:9 125:20 133:23
145:13
cetera (3) 102:6 116:15,15
challenge (11) 4:14 17:8
31:16 36:18 40:1,4 48:15
49:16 50:23 78:15 142:6
challenged (7) 40:11,14,18
41:7,8 58:11 97:2

challenging (3) 17:7 18:25
36:10
chance (7) 15:15 30:25 31:6
32:11,21,24 49:19
chances (1) 49:20
change (6) 2:10 78:6
147:7,8,9 162:6
changed (7) 90:15 97:2
131:11 146:19 152:23,24
155:23
changes (1) 77:17
characterisation (1) 158:6
characterise (1) 159:17
characterised (1) 159:7
charge (4) 46:24,24 47:17
133:7
charges (1) 133:18
charles (1) 157:18
check (2) 14:15 61:5
chemical (1) 153:1
chemicals (1) 127:1
cherry-picked (1) 56:3
chief (2) 113:10 114:13
china (4) 43:16 45:1
144:17,18
chip (6) 126:3,4 128:15,21
133:18 155:2
chips (3) 126:3 153:15,16
chocolate (4) 127:4,4,8,10
130:2 (2) 104:23 105:1
choose (4) 13:7 50:17 77:22
119:16
choosing (1) 77:2
chose (1) 145:3
chosen (3) 119:15 136:16,18
chronic (2) 137:10 138:1
chunk (1) 115:12
circumscribed (1) 22:24
circumstance (2) 3:23 118:6
circumstances (1) 65:25
circuses (1) 134:17
civil (1) 162:22
claimant (7) 17:10,20 18:21
19:9,10,11,14
claimants (7) 2:24 5:3,14
36:10 41:8 112:22 140:3
claimed (1) 99:12
clamour (1) 131:15
clarification (1) 132:21
clarify (5) 7:7 42:17 92:12
96:19 132:6
class (2) 115:18 159:20
classified (1) 24:16
classification (1) 162:16
cleaned (1) 102:6
clear (13) 13:15 15:11 22:22
27:21 29:7 65:21 70:3
77:13 78:5 101:23 107:7
115:17 158:20
clearly (2) 24:24 111:2
clerk (4) 5:9 8:15 55:10,14
clinical (17) 23:19
116:10,11,19 118:23
119:22 123:12 124:17
125:4 126:21 130:19
139:11 142:11
145:14,24,25 159:3
close (5) 34:25 35:8 46:15
81:2 87:25
closed (3) 11:16 13:20
156:14
closely (3) 79:7 80:25 81:4
closer (2) 165:4,4
clump (1) 115:8
code (2) 41:22,23
coincidentally (1) 1:19
colleagues (1) 104:1
collect (1) 94:13
collective (2) 62:14 63:3
collectively (4) 61:16,17
62:3,13
come (33) 1:21 3:25 11:7,9
13:3 14:11,24 16:17 17:1
25:12 35:25 36:20 43:16
49:7 69:13 84:9 93:23 94:6
101:24 103:6 117:12 129:6

131:16 141:4 142:2 143:12
147:7,8 153:19 156:12
157:8 159:11 164:5
comes (6) 23:20,23 127:9
134:3 153:21 160:6
comfortable (2) 8:25 113:5
coming (8) 76:19 80:4 101:5
102:25 105:12 146:6 152:1
163:8
comment (4) 24:3,4 83:23
115:13
commercial (3) 44:22 74:17
87:17
common (1) 92:14
communicate (1) 5:8
communications (1) 1:25
148:14
companies (11) 15:25 16:3,5
18:10 19:6,8,13 86:16
114:24 152:2 164:2
company (35) 11:9,11
15:7,12 16:8 17:24
18:1,4,6,10,16 19:3 24:20
35:21 41:21 46:20 47:4,16
48:8 74:7,8 80:24 81:4
104:13,16 105:10,23
106:13,14,16 107:9
110:11,17,18
companys (2) 66:10,11
companysupported (1) 105:3
compared (1) 51:20
comparing (1) 135:20
compassion (6)
99:18,20,21,23,23 100:2
competent (1) 24:12
compiling (1) 107:15
complain (1) 74:10
complaint (1) 28:23
complete (1) 9:13
completely (3) 1:15 78:3
106:8
completeness (1) 137:1
completes (1) 112:6
comprehensive (1) 150:17
comprises (1) 114:22
computer (5) 131:10
153:2,5,12 155:2
computers (4) 126:2 127:21
153:4,14
concealed (1) 96:6
concentrate (3) 17:18
48:13,18
concentration (1) 72:1
concept (1) 80:12
concern (4) 58:25 65:4 79:9
102:3
concerned (6) 2:14 3:22
38:20 53:11 66:18 67:14
concerning (1) 73:21
concerns (4) 13:18 94:20
103:9 157:9
conclusion (1) 5:5
88:10 135:6
conducted (3) 4:11 29:18
116:11
conducting (1) 29:15
confident (2) 2:21 23:11
confirm (5) 38:15,17 85:10
88:10 135:6
confirmation (1) 40:3
confirmed (2) 39:9 40:8
confirms (1) 153:11
conform (1) 155:8
confused (3) 17:22 18:4
19:16
confusion (3) 106:4
138:17,19
connecting (1) 16:4
connection (2) 18:12 110:12
conscious (2) 65:20 67:12
consequents (1) 140:2
consignment (1) 12:10
consortium (1) 136:9
contact (3) 37:19 87:22,25
content (2) 114:1 141:7
contest (1) 74:4

contested (2) 149:4,7
context (4) 13:22 58:10 97:9
121:14
continual (1) 99:15
continuation (1) 130:25
continue (3) 96:3 101:5
145:22
continued (2) 99:14 108:20
continues (1) 108:23
continuing (1) 130:20
contract (3) 18:2 114:25
157:18
contracted (1) 18:1
contractors (3) 75:1
102:20,22
contracts (1) 143:5
contradict (1) 144:1
contribute (1) 115:1
contributed (1) 4:25
contributes (1) 115:6
contribution (1) 98:18
control (2) 66:22 67:9
controversial (1) 73:13
controversy (1) 111:1
convention (1) 84:12
conventionally (2) 61:23
145:13
conventions (1) 119:17
convoy (3) 92:20,23 93:2
copies (5) 7:17,21 8:9,16
25:22
copy (8) 8:14 10:24 11:2,2
26:8 112:11 121:20
corporation (1) 45:20
correct (21) 10:22 26:22
44:25 45:6 49:18,21 54:21
63:11,16,17 67:24 71:8
75:7 83:22,22 91:4 99:13
124:8,18 125:12 132:3
corrections (1) 132:24
correctly (4) 73:3,3 80:24
125:3
correlate (1) 132:17
correlation (3) 135:23,25
136:19
correlations (1) 135:24
corroborate (1) 139:14
cost (3) 104:8,15 133:14
costs (1) 89:9
couldnt (5) 14:17 76:8,10
83:23 146:4
council (2) 114:23 150:11
counsel (3) 29:16 31:9 36:19
counterproductive (1) 159:7
countries (2) 86:16 144:8
country (32) 11:7,12 12:9
24:22 25:7 30:12 42:2
43:21 85:11,20 87:16
119:3,12,17 123:18,14
139:3 140:1,10,16 142:11
143:20 145:4 152:12
155:12,13 157:3,13 161:13
162:3,3
couple (6) 68:12 85:8 94:3
121:5 149:12 156:11
course (4) 29:17 79:17 112:9
134:8
courtroom (2) 9:3 54:5
courts (3) 35:1 134:21
162:23
cover (5) 76:16 77:2 78:1
101:8 106:25
coverage (2) 26:1 158:11
covered (8) 2:1 76:2
88:18,22 89:4 103:15
107:12 145:8
covering (1) 76:4
covers (1) 118:1
crate (3) 79:11,14 97:4
crates (6) 77:11 78:6 83:1,21
94:9,12
107:12 145:8
crazy (1) 146:5
create (1) 131:21
created (1) 111:5
creating (1) 131:23
creation (1) 160:17

credit (5) 30:14 31:11,20,22
32:10
criminal (1) 46:4
critical (4) 56:8 156:11,13,16
criticise (1) 24:8
criticised (1) 156:9
criticising (1) 139:18
crosexamination (26)
4:11,18 6:17 15:4 22:23
27:22 29:13,15,18 30:13
13:10,19 32:8,16 33:6 49:2
50:15,21 91:12 109:13,14
114:7 166:7,9,11,17
crosexamine (1) 3:9
crosexaminated (2) 8:4 31:21
crosexaminating (2) 4:16 53:1
crosspurposes (2) 88:23
106:4
crowd (1) 57:13
cultures (2) 128:15 153:14
currency (1) 65:11
current (7) 45:21 111:6
114:10 121:3 122:8,14,22
currently (1) 156:20
curtailed (3) 66:6 145:20
163:19
curtain (311) 2:8 4:5,15
5:17,19 6:18,23
7:4,8,10,12,17,19,21,24
8:1,5,17,19 10:20 11:1
12:1,21 15:4,5,15,21
17:6,9,16 18:22,25 19:15
20:20,22 22:13 23:2
24:2,3,10,14 25:25
26:7,8,9,12,15
27:10,14,20,23 28:5,18,20
29:8,21 30:2,19
31:12,15,25 32:2,6
33:5,9,12,21,22 34:1,5,16
35:14,20 36:6,16
37:11,17,18 38:9
39:3,5,9,18,20,25
40:8,15,20 41:10,15,19
42:23 43:10,24 44:25
45:24 46:2,17,19
47:2,12,14,18
48:1,6,9,11,19,22
49:3,5,10,14,19
50:1,4,7,11,24 51:4,5,7,8
52:5,12,15,17,19,22,25
53:7,9,15,18 54:10,21,24
55:1,7,16 56:15,17,19
57:2,5,6,22 58:13,16
59:2,10,12,17 60:17 61:8
62:2,6,11 63:25 64:3,9
65:7,12,21 66:15,22
67:2,8,19,25 68:12,16 69:5
70:24 71:14,16,17
72:6,7,15 73:21,23 78:3
84:6,22,23 81:12
82:4,6,11,20 83:5,17,19
84:2,4,8,15,18 85:7,8
86:9,11,18,19 87:22
88:2,8,10,22 89:3,7,18
90:16,20 91:6 93:17
103:12,15 105:17
109:11,13,14,15
110:2,11,22,23 111:22,24
112:2 114:7,8 115:13,14
116:21,24 119:9,11,25
120:2,3,12,20,22,25
121:10,14,16,19,21
122:2,3,5,10,13 123:4,6
124:6,22 126:24 128:11
129:9,18,19,21
130:16,21,24
138:7,8,12,15,20,21,24
139:13,17 140:5,7,24
141:3,4 142:1,2,6,15 144:4
145:8,15 146:21
149:1,14,15,16 150:6,15
152:8,9 158:4,7,10 160:21
161:6 162:9,12 163:1
166:7,11,17
curtains (8) 4:18 23:19 28:3
32:15 38:25 69:20 81:3,8

custom (7) 117:7,9,9
118:15,16,20 151:16
customer (5) 13:6,13 14:21
43:8 86:25
customers (5) 13:9 14:8
87:6,10 143:8
customs (1) 161:15
cutting (1) 125:18

D

d11 (2) 51:7 52:20
daily (5) 39:18 75:2 95:18
101:11 106:10
damage (1) 74:6
damaged (2) 104:24 154:1
damages (3) 74:6,8,8
danger (1) 80:12
dangerous (1) 139:7
danish (1) 10:24
data (3) 126:18 128:19,19
date (5) 12:11,14 79:5 82:4,7
dates (1) 26:11
day (14) 12:14 30:8 36:21
currently (1) 156:20
curtailed (3) 66:6 145:20
163:19
curtain (311) 2:8 4:5,15
5:17,19 6:18,23
7:4,8,10,12,17,19,21,24
8:1,5,17,19 10:20 11:1
12:1,21 15:4,5,15,21
17:6,9,16 18:22,25 19:15
20:20,22 22:13 23:2
24:2,3,10,14 25:25
26:7,8,9,12,15
27:10,14,20,23 28:5,18,20
29:8,21 30:2,19
31:12,15,25 32:2,6
33:5,9,12,21,22 34:1,5,16
35:14,20 36:6,16
37:11,17,18 38:9
39:3,5,9,18,20,25
40:8,15,20 41:10,15,19
42:23 43:10,24 44:25
45:24 46:2,17,19
47:2,12,14,18
48:1,6,9,11,19,22
49:3,5,10,14,19
50:1,4,7,11,24 51:4,5,7,8
52:5,12,15,17,19,22,25
53:7,9,15,18 54:10,21,24
55:1,7,16 56:15,17,19
57:2,5,6,22 58:13,16
59:2,10,12,17 60:17 61:8
62:2,6,11 63:25 64:3,9
65:7,12,21 66:15,22
67:2,8,19,25 68:12,16 69:5
70:24 71:14,16,17
72:6,7,15 73:21,23 78:3
84:6,22,23 81:12
82:4,6,11,20 83:5,17,19
84:2,4,8,15,18 85:7,8
86:9,11,18,19 87:22
88:2,8,10,22 89:3,7,18
90:16,20 91:6 93:17
103:12,15 105:17
109:11,13,14,15
110:2,11,22,23 111:22,24
112:2 114:7,8 115:13,14
116:21,24 119:9,11,25
120:2,3,12,20,22,25
121:10,14,16,19,21
122:2,3,5,10,13 123:4,6
124:6,22 126:24 128:11
129:9,18,19,21
130:16,21,24
138:7,8,12,15,20,21,24
139:13,17 140:5,7,24
141:3,4 142:1,2,6,15 144:4
145:8,15 146:21
149:1,14,15,16 150:6,15
152:8,9 158:4,7,10 160:21
161:6 162:9,12 163:1
166:7,11,17
curtains (8) 4:18 23:19 28:3
32:15 38:25 69:20 81:3,8

design (1) 127:15
designed (3) 137:24 139:9,10
desirable (1) 14:19
detail (3) 17:17 23:24 86:5
details (1) 132:20
detrimental (1) 142:10
develop (1) 145:22
developed (2) 151:24,24
development (5) 21:4,14
125:24 145:18 163:18
didnt (18) 5:21 26:17
50:5,18 56:5,10 72:21
117:6 127:20 131:4 132:10
154:18 155:16,23 156:6
158:1,17 159:24
die (7) 64:20,21 68:20,24
69:4,18 71:3
difference (3) 127:9,10,17
differences (1) 127:14
different (33) 3:13 11:17
31:8 32:5 39:2 46:22
52:22,23 53:14,17 57:18
60:15 77:15 92:13 93:1
96:14,18 106:8,23 107:1
111:22 118:13 122:20
127:11,17 128:20 135:20
136:13 141:21 154:3
155:23,24 162:18
differently (2) 76:13 77:14
difficult (10) 11:24,25 13:12
32:16 73:16 74:20 76:3
79:23 81:1 164:12
difficultly (1) 76:10
direct (6) 17:7 22:2 61:6
90:5,23 97:18
directly (3) 20:4 61:22
119:16
discussions (3) 16:14 47:6,8
disagree (6) 50:6,19
151:9,10 152:24 159:24
disagreed (1) 140:11
discuss (1) 84:22
discussed (2) 146:2 155:15
discussing (1) 145:5
discussion (3) 65:13 120:25
149:3
discussions (1) 88:7
dish (1) 128:7
dispute (2) 34:4 55:22
disputed (1) 40:16
disruption (2) 37:9,19
disservice (1) 65:12
distance (1) 104:22
distinctive (1) 105:25
distracting (1) 79:16
disturbing (1) 79:16
divide (2) 110:14,15
divisions (1) 46:25
dna (1) 128:7
doctors (2) 136:5 147:17
document (16) 8:8 12:7,12
29:7 41:20 120:24,25
121:18 122:3,4,5 148:6,16
149:15,16 157:16
documents (14) 5:19,20
7:18 8:12 27:11 28:7,9
29:20 30:13 31:5,9 41:16
59:17 120:6
does (26) 30:25 31:2 41:24
51:9 58:9 61:17 62:22
67:23 75:3,4 87:9 103:2
117:3,24 119:12 124:20
127:6 128:24 129:21
139:20 140:20 145:7
153:10,11 155:5,11
doesnt (30) 2:10 22:16
28:14 31:4 36:5 49:2
52:9,10 63:21 69:19 74:6
96:12 106:25 117:7 120:18
124:10,13,20 126:11 103:2
132:4 142:7 144:1 146:11
149:6 151:20 157:4 164:21
165:2,3
dog (50) 24:22 26:23,24,25
31:13 42:6,9 46:7 69:12,14
71:2,19 72:4 79:10,11

85:12 86:22,22,24,24 87:2
90:14 91:3 94:8,12 111:4,6
117:8 119:1 123:15,16
125:19 126:10,22 127:19
135:10 136:21 137:7,10
143:4,10 145:2
154:5,14,22 155:3 161:8
163:24 164:5,6
dogs (166) 11:6,11,22,23,24
12:5,16,18,18,23
13:6,8,16,22 14:1,10,11,14
15:1 20:13 24:16,17,20
25:5,6 38:18 40:17,21
41:1,12,17 42:1,10,11,15
44:10 63:14 64:20,21 65:2
68:19,20,24 69:16,18,23
70:9 71:6,7,13,25
77:9,10,11,19,22,25
78:1,5,6,9,10,14,16
79:3,9,15,16 81:14,17
82:13,14,25 83:12,14,21
85:11 86:8,19
87:6,8,11,12,16 89:21
90:2,23,23 93:21 94:21
95:14,19,19 96:9,20 97:3
102:3,4 103:7,9,17
109:15,17 110:5 111:3,25
112:1 117:6,7 118:9,16,17
123:6,6,7,9,20,21,21,23,25,25
124:1,4,14,16,20
125:21,22 126:18
127:1,7,8,11,12,18 129:15
137:2 138:10 139:1
141:7,10,16,17,22 142:18
143:2,9,16,19 144:24
145:3,4,6,12,13,17 146:2,3
155:17 157:10,13,14
161:16 163:17,22
doing (16) 3:3,4 8:8 24:10
27:21 28:21 44:2 50:3 66:1
70:19 83:1 96:13 145:25
154:14 158:4 160:19
domain (1) 54:3
domestic (1) 44:5
done (20) 24:22 32:13 42:5
50:22 57:4 71:8 75:18
76:8,10,10,13 92:1 107:16
125:7 126:4 140:4 149:8
150:1 161:16 162:12
donkeys (1) 118:10
dont (116) 2:7,11,17,23 3:6
6:22,24 8:1,3 15:8 16:7
24:8 29:3 31:8,21 35:3,4
36:7,9 38:24 39:25
40:10,15 41:10 43:13
44:20 45:25
47:10,18,22,24 48:2,3
49:10 54:5 55:11,22 56:17
58:5 59:14 62:14 63:5
64:20 66:17 67:21 69:4
71:9,14 74:4 75:14 77:3
78:19,21 80:16,21,25
84:22 85:8 86:5,17
88:5,6,6 94:16,18
98:1,8,13 102:18,24,25
105:22 106:8 109:20
111:1,25 120:1,2 124:6
127:8 129:3,11 130:1
132:16 133:20 134:24
135:1,5 136:23 137:8,20
138:2,5 139:23
140:9,13,14 141:4 142:3
143:13 145:3 146:23 149:7
151:4 152:15 153:2
156:4,7,18 157:1,23
159:17 160:16 162:11,20
dose (1) 139:5
doses (3) 139:15,15,15
doubt (2) 12:17 56:20
down (28) 4:9 8:24 13:15,20
23:13 28:10 30:12 32:9
33:1 35:6 82:2 85:22,24
87:15 94:1,2 95:3 100:12
103:15,16 111:24 138:18
143:24 144:10 156:14
158:22 160:9 162:9

dr (1) 150:10
draft (1) 132:19
draw (3) 56:21 121:1 162:20
drive (8) 61:14,15,24,25 62:1
102:16 106:19,20
driven (1) 47:23
drivers (1) 102:24
driveway (1) 102:17
driving (4) 61:16 122:16
151:8 160:17
drone (45) 39:7 73:17,19,24
74:2,2,4,6,9,11,12,21,24
75:19,25 76:12,13,17,22
77:5,22 79:12,15,17,19
80:5,7 81:22,24 82:13,15
83:2,7,15,20 84:3 94:25
95:2,12,17,22,24
96:14,16,25
drones (6) 73:21 76:8
77:6,15 95:6 96:11
drug (6) 21:4 125:3,24
138:9,10,17
drugs (1) 153:25
due (3) 11:16 93:5 102:21
during (3) 31:11 67:23 113:4
duties (2) 16:13 95:18
dying (1) 161:16

E
e (1) 38:17
earlier (6) 85:14 111:12
141:13 145:5,10 164:1
early (7) 25:11 102:13 105:6
125:2 143:13 153:25
154:25
easier (1) 65:9
easily (3) 59:19 79:9 141:7
edge (1) 125:18
effect (1) 142:11
effects (1) 126:11
efficacy (1) 135:15
either (6) 26:6 59:18 65:12
87:5 92:6 102:11
elided (1) 145:10
else (1) 164:9
email (2) 1:19 7:2
emails (1) 1:20
emblazoned (1) 105:23
emerge (1) 66:25
emotion (1) 73:15
emotional (1) 96:21
emotions (1) 111:2
emotive (2) 69:22 95:20
employed (6) 17:10,19 18:20
19:13 99:12,17
employee (2) 105:9 108:6
employees (5) 72:12
98:15,21 105:7,11
employer (2) 15:5,6
employment (1) 17:23
enact (1) 119:16
encroach (3) 75:3,4,16
encroached (2) 74:21,22
encroaches (1) 74:18
encroachment (1) 76:5
end (15) 9:23 55:11 58:3
61:4 66:16 95:9 113:18
126:10 138:25 139:5
140:25 154:5 159:2,6
164:22
endeavouring (1) 58:20
ended (2) 27:4 28:1
engage (1) 41:9
engaged (1) 159:3
england (1) 35:25
english (1) 119:23
enjoy (1) 85:2
enormously (1) 152:25
enough (7) 7:20 32:16 35:8
45:19 125:7 144:18 160:3
ensure (1) 68:4
enter (1) 59:18
entered (2) 163:21,22
entering (5) 101:19,21
102:2,4,19
entire (2) 59:9 131:10

entirely (2) 46:22 105:20
entitled (7) 20:20 23:2
29:17,23 30:2 44:21
160:12
entrance (1) 101:22
entries (1) 14:5
envigo (15) 11:16
12:10,15,23 14:13
85:17,18,21 142:25
143:3,8,9,19,24 144:10
environment (5) 74:20
77:12,12 141:8,18
equally (1) 163:9
equids (1) 118:9
equivalent (1) 124:2
errors (1) 67:22
escalated (1) 34:23
escape (1) 156:22
especially (1) 66:9
essence (1) 50:9
essentially (4) 6:9 39:10
53:10 100:9
establish (10) 16:21 17:3
19:4 36:7,13 38:15 48:4
68:13 71:6 107:20
established (3) 14:25 45:5
154:24
establishing (1) 44:3
establishment (9) 19:21
20:1,5 21:12 25:1 60:7,9
72:16 73:13
estimate (1) 79:23
et (3) 102:6 116:15,15
eu (1) 110:5
europa (6) 13:12 47:6
109:23 110:4,6 156:14
european (6) 46:5,13
47:3,5,9 109:21
evaluate (1) 132:4
even (14) 3:8 14:18 28:1
30:25 31:4 32:22 36:3
37:25 62:14 86:14 93:11
138:3,3 148:5
evening (1) 1:17
events (1) 59:24
eventually (2) 133:5,6
ever (10) 8:4 59:10 73:5
74:9 76:22 79:19 88:8
110:14 136:17 156:9
evergreen (1) 16:1
evergrowing (2) 131:14,15
every (11) 6:19 60:14 61:10
66:15 96:3 101:5 152:10
154:8,21 155:18 163:2
everybody (5) 112:17 150:24
160:10,12 165:5
everyone (2) 9:3 129:21
everything (6) 73:2 75:14
108:16 126:4 141:20 163:1
evidence (66) 4:14 7:6 13:18
14:17 20:20 22:5,9,20,25
25:22 27:8,16 28:25
30:18,23 31:17 38:25 39:1
44:4,8,17 49:15 57:3
59:6,9,21 61:2 64:1,2
65:12 67:5,10 75:23
82:24,25 84:5,22 89:14,17
98:10 103:19 107:15 112:7
113:4 114:9 117:17 124:19
126:15 130:17 131:15
135:8 136:13,20 139:20,24
140:3 141:6 142:9,10
143:18 144:21 148:15
163:9 164:23 165:1,4
evidenced (1) 27:6
exactly (3) 54:12 83:4 89:3
examinationinchief (4) 9:5
113:7 166:5,15
example (23) 38:6 40:25
55:7 62:11 74:22,23
75:15,17,18,21 76:14,17
77:9 81:14 90:22 103:25
104:25 127:3 133:17,22
137:9 152:16 157:2
examples (2) 50:17 156:12
except (2) 6:6 130:5

exceptions (1) 115:23
excess (1) 43:13
exclusion (1) 59:10
exclusively (2) 55:4 122:15
executive (3) 79:2 113:11
114:13
exhibit (2) 38:17 113:24
exhibits (2) 9:24 113:23
exist (2) 87:15 114:20
existed (1) 155:25
existence (1) 71:22
exists (1) 120:15
exit (2) 100:17,24
exiting (1) 91:22
expand (4) 34:5 51:23 77:8
141:12
expectation (2) 122:16,25
experience (1) 72:23
experienced (4) 6:2 25:15
34:11 57:12
experiment (4) 21:8 123:9
139:1 156:10
experimental (1) 25:4
experimentation (2)
155:10,11
experimented (2) 20:13 63:8
experiments (26) 24:21
125:13,19 127:23 128:18
130:10 131:12 133:22
134:19 135:3 136:3
137:14,22 147:10,11,20,23
148:9 149:25 155:14 156:3
157:3,5,7 158:14 161:19
expert (3) 115:19,20 136:14
experts (1) 147:18
explain (10) 66:1 73:15 79:8
101:4 106:11 116:6 132:10
137:13 157:6 161:1
explained (6) 17:6 22:14
47:17 68:2 144:9 154:15
explaining (4) 90:7,10
100:21 135:21
explains (1) 124:16
explanation (1) 136:19
exploded (1) 160:25
explore (1) 84:16
explored (1) 72:13
exploring (3) 6:6 43:24 64:9
exported (1) 12:8
expose (1) 96:12
express (1) 58:21
expressly (1) 22:9
extend (1) 110:23
extensive (1) 125:10
extent (7) 29:21 34:3 35:17
45:20 100:13,14 124:19
extra (4) 89:9 103:14
118:7,11
extract (2) 64:20 65:15
extracts (1) 39:6
extreme (3) 139:2,4 159:6
extremely (6) 35:5 126:18
135:14 136:16 151:17
164:12
extremism (3) 159:20
162:15,20
eye (2) 30:25 59:24
eyesight (1) 11:5

F
facebook (3) 73:20,24,25
faces (2) 76:4 77:2
facial (1) 76:2
facilitate (3) 93:21 102:13
147:8
facilitated (1) 94:22
facilitating (3) 58:18,22
87:21
facilities (6) 14:23 25:19
38:21 45:20,21 156:14
facility (26) 11:16 13:4 26:25
27:24 34:5 35:13,17 36:5
39:11 40:5,18 45:17,25
46:7 69:18 70:10 79:20
86:2 95:4,7 111:6 143:1,8
145:2 164:7,11

factor (1) 100:10
factors (1) 100:13
factory (3) 26:24 34:19
111:5
fail (2) 95:22 127:4
failure (2) 28:3 136:6
fair (8) 32:19 45:19 48:4
55:2 80:21 81:10 103:18
114:19
fairly (2) 34:7 68:2
fairness (4) 70:17 82:21
103:18 139:19
faith (1) 66:20
falls (1) 47:20
familiar (2) 41:24 149:18
famous (1) 71:19
fancy (1) 127:22
fantastic (3) 128:21
153:17,24
far (9) 32:22 42:6 53:10
59:21 67:9,15 132:14
151:24 162:12
farm (2) 15:22 134:17
farms (2) 16:2,2
fast (3) 102:16 146:6 160:9
fatigue (5) 99:18,22,23,23
100:2
fault (1) 70:4
faul (6) 125:6 146:8,17,19,21
147:3
feature (1) 100:20
february (1) 143:23
fed (1) 102:5
feed (2) 76:20 152:13
feedback (2) 55:11 101:2
feel (21) 2:12,18,24 8:24,25
36:13,23 41:3 47:23 61:1
62:6,22 80:17 81:11 92:21
95:15,17 113:3 140:25
141:5,22
feeling (2) 3:2 56:24
feelings (1) 61:3
feels (3) 66:4,5,7
fell (2) 35:23 60:10
felt (2) 94:10 104:16
fence (7) 95:1,5,21
96:5,14,15 97:4
fences (2) 96:10,24
fencing (1) 95:15
few (15) 4:15 14:14,14 45:16
50:17 74:13 84:8 94:1,2
98:6,6 101:10 104:19
143:6 150:3
fewer (1) 124:3
figures (6) 135:9,11,23
136:5,10,17
filmed (1) 40:12
filth (1) 40:21
final (4) 108:23 125:25 154:7
163:14
finance (1) 104:7
financed (1) 104:5
find (17) 1:19 17:11 39:21
48:6 74:20 81:1 97:14 98:4
112:23 121:15 131:20
134:12 135:4 140:18
151:12 160:3,10
finding (5) 131:23 139:25
152:21 158:8 160:4
findings (1) 141:3
fine (6) 2:3 6:16,21 8:11
162:25,25
finish (5) 84:14 121:11
128:10 129:1 161:10
finished (2) 15:15 157:25
first (21) 5:14,17 8:21 11:6
12:2,9,13 17:18 19:9 57:7
84:10 88:24 90:25 91:3
94:1 107:20 132:19,22
133:3 150:16 153:7
firstman (1) 123:12
firstly (1) 159:17
fishing (1) 39:10
five (3) 6:5 48:23 149:2
fiveday (1) 138:3
fixing (2) 75:20,25

flag (6) 22:18 48:22 67:11,17
164:18 165:3
flies (4) 74:1,12,13 75:1
flight (3) 6:23 10:21 109:20
flights (1) 110:10
flow (1) 76:11
flown (5) 83:20 109:16
142:19 144:4,8
fly (3) 11:21 74:4 83:6
flying (9) 73:19,24 74:5,24
76:9 77:5,6 79:12 80:7
focus (1) 125:1
foi (1) 87:8
folder (1) 1:19
follow (2) 50:21 113:23
following (6) 17:13 26:6 56:6
75:11 90:18 103:23
follows (1) 74:14
footage (14) 38:14
39:5,7,8,12,13,16,20
40:4,17 80:5 83:11,20 96:9
forced (2) 2:18 156:20
forget (6) 46:20 62:12,16
73:10 138:15 146:7
forgetting (1) 54:16
forgive (1) 73:17
forgotten (1) 48:7
form (2) 73:9 76:4
formally (1) 3:13
formed (4) 155:24
160:22,23,24
forms (1) 160:7
formula (1) 153:1
fortunate (1) 159:22
forward (1) 67:23
found (4) 3:16 85:25
134:9,11
foundation (1) 114:24
founded (2) 36:9,12
four (2) 14:5 84:15
fragile (1) 67:13
framework (2) 123:5 150:18
france (1) 45:3
frances (3) 148:18 149:11
150:10
free (6) 8:24 59:13,14,15
75:20 113:3
freedom (1) 10:23
friday (1) 165:9
front (6) 9:17 32:8 65:13
92:11 94:14 113:13
fulfil (1) 87:11
fulfilled (1) 143:15
fulfilling (1) 143:6
fulfillment (1) 35:24
full (5) 9:7 86:5 97:22 113:9
161:14
fully (5) 18:25 58:24 83:24
86:13 103:4
fumbling (1) 120:5
function (1) 140:18
functioning (1) 85:21
fundamentally (1) 81:7
funded (6) 107:5
133:12,13,14,16 134:1
fundors (1) 115:10
funding (2) 134:3,7
funels (1) 133:19
funeral (1) 98:4
furore (1) 111:5
further (18) 10:19 12:3,11
15:3 33:4 42:18,19 44:17
74:2 84:13 103:22 109:14
114:5 132:9,20,20,20
166:11

G
gate (1) 94:14
gates (1) 94:9
gateway (1) 125:25
gather (1) 5:21
gave (5) 63:21 89:17 131:1
145:10 148:15
general (2) 116:14 117:14
generalise (1) 52:5

generally (3) 54:18 141:16
155:8
genetic (1) 72:4
genuine (1) 16:23
geographically (1) 110:1
get (43) 3:10 4:4 9:22 15:11
28:8 30:25 49:20 53:1,5
57:10,11 62:5,10 64:13
67:10 68:10,14 82:4,7,14
83:15 94:23 99:23 109:21
127:1,3 133:5 143:9
144:18 147:11,12,14,20
148:12,13,13 150:4 154:19
159:5 160:2,16 164:7
165:4
gets (6) 28:7 57:16 84:12
110:13 123:16 128:22
getting (10) 33:16 53:4
55:10 66:14 91:17 146:22
147:10 149:1 154:12
163:11
give (24) 2:12,19 47:15 61:4
62:11 74:22 75:17,21
76:14 90:4 93:17 113:9
114:8 120:19 121:14
125:5,19,25 126:21 135:8
139:19 145:23 163:8 165:1
given (23) 13:18 14:17 16:12
19:25 20:6 21:16 22:4
23:18,22 29:19 32:21 33:2
49:1 84:20 98:10,14 104:2
112:8 118:11,23 139:15
145:5,22
gives (5) 24:20 41:5 50:20
135:9 142:10
giving (5) 16:14 22:19 101:4
139:14 165:4
glaxos (1) 151:18
global (1) 45:7
god (3) 131:16 161:18,18
goes (12) 7:7 35:20 36:8
52:7 58:8 60:16 67:4
88:14,16 124:22 139:4
140:8
going (76) 1:18 2:6 3:1,4
4:3,24 6:6 7:13 8:7 9:11
10:19 11:4 27:15 28:24
38:20 40:4 44:11,14
45:18,23 46:20 48:9,12,20
49:6,7 54:22 55:13
57:11,15,17,19,24,25
61:9,10 62:8,15,19 65:4,15
66:25 67:3,15,16 68:12
84:9 86:9 87:14 95:18
102:8,14,17 106:9 110:25
111:4 120:12 125:4
129:7,24 141:2,4 142:7
143:15 145:25
147:7,7,14,15 158:8 160:9
162:24,25 164:19,23 165:1
gone (5) 44:16 46:19 58:5
107:16 125:24
good (27) 1:12 11:4 20:8
34:16 44:2 47:14 59:20
72:15 84:19 86:19 87:19
91:6 112:15 113:8
115:12,21 125:20 130:21
131:13 148:9 149:14,24,25
150:2 151:1 162:9 163:3
gossip (2) 144:14,14
goto (1) 87:25
government (4) 10:24
33:16,17 133:24
grand (1) 162:6
granted (2) 108:16 132:22
grateful (1) 6:22
great (5) 110:14,15,19 121:6
128:23
green (1) 52:11
grimston (2) 9:9 31:13
ground (1) 31:13
grounds (1) 157:23
group (28) 15:22 16:1,2,2
18:24 19:7 53:14,16,16
56:11 61:19 62:10,14
77:19 81:5 87:6,18 92:24

93:9 103:16 114:15,16,18 120:13 121:1 146:25 155:21 158:1 groups (2) 87:12 120:16 guesswork (1) 111:20 guidance (4) 49:11 121:10 122:14,23 guide (2) 24:16 67:21	helps (1) 37:11 helsinki (8) 116:12 117:12 119:13,14 124:23 131:5 152:23 155:1 here (39) 7:5 12:1 13:16 16:22,25 19:4 20:14 21:18 25:11 33:14 36:19,22 37:2 39:5 54:15 55:23 57:7 61:2 65:5,22 71:5,14 73:1 115:18 118:15 119:18 125:9 128:4 134:5 135:8 139:13 140:18 142:16 147:18 150:25 151:14 155:19 157:8 164:21 herself (1) 23:11 hes (17) 2:9 17:7 22:10 28:3 40:2 44:14,16 53:14 64:13,18,19 66:10 67:9 68:1 83:19 149:18 162:12 high (14) 27:4,5 32:6 33:16 34:21 78:25 79:2 80:3 89:24 90:1 119:12 126:18 135:11 139:5 higher (4) 35:1 79:24 80:1 93:22 highest (1) 136:17 highlight (2) 34:9,14 highlighted (5) 121:21 122:5,7,12,13 hindered (1) 102:2 hire (6) 104:13,20,21 105:5,22 107:10 hired (1) 104:14 hiring (1) 105:23 history (4) 35:21 53:22 131:13 158:15 hit (2) 91:23 92:5 hits (1) 67:21 hitting (3) 92:16,18,19 hmm (6) 38:10 43:5 69:19,25 71:21 76:6 hmmhmm (4) 12:6 14:4 51:18 85:13 hold (4) 55:23 57:9 147:25 148:3 holder (18) 19:21 20:1 21:9,13 22:1,5,8 24:11 36:16 38:5 40:22 41:13 60:5,8 62:4,10 72:17 75:3 holding (4) 51:9,17 110:17 131:9 home (18) 20:6 21:3,5 23:23 107:11 132:16 133:3,9,10,12,18 134:14,20,20,23,25 158:12 164:8 homing (1) 30:5 honest (1) 2:8 hope (5) 125:21 128:22 129:3 137:2,9 hopefully (3) 84:18 120:12 131:7 horrified (1) 162:13 horses (2) 24:17 118:10 hour (1) 102:18 hours (3) 41:11 83:10,20 house (1) 18:10 housekeeping (1) 5:17 hr (1) 101:1 huge (2) 13:24 139:15 hull (4) 6:3 9:9 19:22 25:16 human (20) 19:24 21:21 23:17,18,21,22 88:13 115:24 116:9,19 118:23 119:22 123:11,12 126:1 129:7 135:10 145:24 155:7 156:25 humanrelevant (1) 120:13 humans (3) 126:17 127:17 136:1 hundreds (3) 54:14 152:16 155:17 hypothesis (1) 126:12	27:6 34:19 46:19,19 79:4 80:16 94:12 96:7 161:18 idea (7) 35:22 55:23 57:2,9 59:12 81:4 158:10 identify (1) 59:4 ideally (1) 2:19 identified (1) 77:3 identify (1) 24:6 identity (1) 96:2 ignore (1) 67:5 ill (24) 8:21 23:13 24:16 25:12 52:19 67:18,23 71:24 85:2 94:6 96:19 97:5 106:10 117:16 125:23 126:22 131:7 137:7 138:18 150:15,16 155:4 156:12 162:9 illegal (2) 160:15 162:3 im (146) 2:14,20,21 6:5,20 7:1,16,25,25 9:11 10:3,19,22 12:14,22 16:6,8,21 17:2,4,13,22,25 18:1,3 19:4,5,15 21:5,8,23,25 23:10 26:5 27:5,12 28:11 29:1,6,12 30:20 31:5 33:15 34:14 36:21 37:6 38:19 40:24 41:24,25 44:24 46:11,11 50:3 52:19,23 54:22 57:15,16 58:9,22 62:15 65:18,19 67:12,14 68:3,12 70:3,4 73:19,24 74:24 76:12 78:22,23 82:2 83:24,24 89:22 92:1,6,16 93:22,24 94:6 95:17 98:2,9,11,11,13,24 99:20 100:5 102:6,11 103:4,11 105:20 106:12 109:18 110:16,18 111:16 113:14 114:13 115:17,20 119:8,11 120:10,15,20 121:15 123:4 124:5,9 125:14,16 126:7 127:13,13,13 128:9 129:23 131:9 136:6,12 137:23,23,23 138:12,18 139:18 141:2 142:7 148:2,2 149:1 154:11 157:19 158:8 159:8 162:13,25 imagine (4) 105:21,22 130:1 143:12 immediately (3) 35:10,11 91:2 immensely (1) 108:25 immigration (1) 134:22 impact (5) 14:22 64:9 72:11 98:18 157:11 impacted (2) 145:19 163:19 impacts (1) 64:24 impeach (1) 28:6 impeccably (1) 28:21 impede (1) 68:4 impeding (1) 59:11 impetus (2) 160:4,8 implement (1) 147:21 import (2) 42:1 157:13 important (11) 3:1 5:1 29:13 30:9 52:25 82:5,11 84:23 90:3 130:2 140:17 importation (1) 41:17 imported (4) 42:20 43:25 86:20 157:14 importer (1) 12:10 importing (3) 85:11 143:19 157:10 impossible (1) 43:20 impression (1) 50:3 imprisoned (2) 46:7,12 improve (1) 147:24 improved (2) 108:25 109:6 inability (1) 24:6 inadequate (1) 24:2 inaudible (10) 40:1 60:11 73:3 81:21 89:4 98:3 104:9 109:18 134:21 154:23 inbox (1) 1:21	incidences (3) 54:14 62:18 96:7 incident (6) 54:23 59:7 73:19,21,23 77:4 incidents (3) 49:23 54:19,22 including (6) 26:2 59:2 72:13 115:3,4 128:20 income (1) 115:7 increase (5) 11:19 25:18 27:24 90:17,21 increased (6) 75:11 89:16,23 90:8,11 103:19 increases (1) 103:22 incredibly (1) 129:14 index (1) 166:1 indicates (2) 41:18 128:6 indicator (1) 125:20 indirectly (1) 119:16 individual (5) 99:9 107:14,24 108:6,10 industry (10) 100:1 114:18 123:19 142:23 151:7,11,16,20 155:22 157:9 influenced (1) 84:24 information (14) 10:23 30:6 46:8 53:22 54:6 69:8 88:6 93:17 97:25 128:21 132:12,17 135:5 141:16 inhaled (1) 153:24 initially (1) 103:21 injunction (15) 16:6 36:23 37:2,3 56:12 57:8 74:5 93:5 108:15,19,23 109:2,3 110:23,24 innovative (1) 159:12 insert (1) 39:10 inside (4) 40:5,12,17 58:21 insists (1) 20:12 insofar (1) 72:9 inspect (1) 133:22 inspecting (1) 133:17 inspectors (2) 133:16,23 instance (2) 128:4 152:10 instances (7) 51:22 60:2,24 75:24 78:10 80:3 101:22 instead (3) 77:23 127:19 156:6 instrument (3) 116:23 119:19,21 insurance (5) 103:24 104:22 105:2 106:22 107:10 intend (1) 66:17 intended (6) 19:23 21:21 23:17,21 88:12 115:24 intents (2) 114:9 133:4 interbred (1) 72:4 interest (8) 43:6 44:9 129:24 130:5,19,25 151:18 161:15 interested (2) 81:6 128:5 interestingly (1) 125:5 interim (1) 108:15 interject (1) 3:11 internal (1) 91:21 internally (1) 148:14 international (1) 16:3 internet (1) 25:25 interpretations (1) 49:17 interrupted (2) 32:15 89:10 interrupting (3) 66:24 77:6,11 interruption (1) 77:22 interrupts (1) 76:11 intervening (1) 86:7 interviews (2) 100:18,25 intimidation (1) 159:19 into (43) 1:16 2:18,25 3:3 12:3 26:23 35:13 36:4 38:25 40:1 42:1,5 47:21 65:5 75:5 76:20 80:3 85:11 87:16 90:22 103:12 110:3,7 125:1 131:13,16 142:20 143:19,22 144:5 146:23 152:11 153:2,9,20,21,21,22 156:21 157:4,13 162:1	164:5 introduce (2) 119:22 141:6 introduced (2) 30:24 90:14 intensity (2) 95:23,24 intrusive (2) 95:6,13 invasive (1) 82:14 investigate (1) 142:4 investigation (1) 65:5 invite (1) 139:20 invited (1) 149:11 involve (1) 129:8 involved (15) 33:16,17 34:23 37:25 38:1 41:21 54:10,11 82:12 87:20 99:2 127:16 134:10 142:22 146:2 involvement (2) 52:6,7 159:4 iq (1) 136:9 irregular (1) 17:11 irrelevant (2) 44:18 67:5 irritates (1) 79:15 irritation (1) 80:11 isnt (31) 20:2,6 22:6 27:18 29:7 32:10 44:10 45:23 65:6 68:5 71:20 83:13 87:9 93:22 109:23 114:9 119:4 123:16 132:3 135:2,4,19 137:17 145:21 146:24,25 148:19 152:20 156:3 160:22 164:17 issues (8) 1:18 11:17 35:15,19 36:2 103:7 109:4 162:24 italian (1) 47:19 italy (5) 45:10,12 46:1,2,7 items (3) 59:1 92:4,6 iterations (1) 133:6 iterative (1) 132:22 its (300) 2:13 3:1,12,18 5:1,22,22 8:6,10 9:2,8,13,17 10:11 12:15 14:14 16:22 17:1,2,5 18:7 20:5,9,11,16 21:6,10 22:5 28:6,18,20,24 30:7,10,15,23,23,24 31:23 32:16 33:7 36:25 37:1,8,11,16 38:16,22,24,25 39:6 40:16,18,20,20,21,24 41:1,2,19 42:4,13,16,24 43:3,3,6,6,8,11,19 44:1,9,16 45:19 46:18,22 47:13,13 48:4,17 50:2,9 51:6 52:24 54:3 55:4,11,25 59:4,4,23 60:10,10 61:5 62:23,23 63:24 64:1,21 66:11,25 67:3 68:22,22 69:11,11,12,14,14,15,16 70:2,2 71:2,7,8,13,20 72:2,3,4,9,10,22,22 73:7,10,15,23,24 74:5 77:25 78:5,17,18,22,24 79:16,22,24,24 80:8,8,12,14 81:1,3,9,11,19 82:1,14 83:14 84:7,21,21,23,24 86:5,18,24,24 87:1 88:20 89:4 90:15 91:9,19,21 92:10,18 93:5 95:13 96:5,17 97:1,24 98:4,8,10 99:15,25 100:8,16 103:12,16 104:8 108:24 109:16,24 110:6,6,10,17,24 111:9,19,20 116:18,20,20,21,22,23 117:7 118:19 119:7 120:3,8,15,25 121:21,24 122:3,6 123:16 124:3,7,24,24 125:18 128:12,18,21 130:2,23,25 131:8 132:3,21,22,25 133:1,1,24 134:3,19 135:3 136:9,16,18,22 137:8,9 139:9,12 140:6,17,22,25	142:4,24,24,25 143:24 144:7,21 146:24 147:4 148:19,20 149:3,4,16,16,17,22 150:25 151:21 152:19,19,20,21 154:5 155:1 156:3,24 157:4,6,22 158:5,5,7,7,8,13 160:9,17,18,21 161:3,14,15,15,20,22 162:3,16 163:23 itself (6) 34:12 53:23 138:5 151:11,25 160:19 ive (49) 2:6 6:19 7:1,3,4,8,25 8:8 15:15 16:12 19:19 25:22 32:11 36:6 38:16 39:13 44:4 49:8 52:6,13,22 54:10,11 55:21 60:12 65:17 68:2 70:24 72:10 78:12 83:8 84:8,15 93:1 97:19 112:8 118:18 122:22 124:18 134:10 136:17,18 141:20 142:22 144:1,8 146:7 149:5 161:3	kills (1) 65:2 kind (1) 110:4 kingdom (1) 19:7 kingman (25) 5:24 15:5,6,8,9 26:3,4,17,23 34:18,20 35:9,12,13 36:23 37:1,2,25 47:10 74:7 79:1 110:13,24 111:4,7 know (82) 2:7,9 3:6 4:21,24 8:8 18:23 20:18,23 21:25 22:10,16 23:19,24 24:11,16 25:3 31:4 37:11,24 40:12 42:6 45:22 48:10 49:4 53:8 54:1,2,5,10 55:11 57:1 60:17 62:4 64:21 78:20 79:4 80:8 85:22,24 86:5,5 88:5,6 94:18 98:13,21,25 99:1 100:14 102:24,24 105:21 107:24 109:15,18,19,20 110:8 120:7 130:1,2 132:16,16 133:12,20 134:20,24 135:1 136:23 137:8,20,21 138:2,5 141:4 143:13 145:8 150:20 153:6 154:17 156:10 knowing (1) 102:14 knowledge (12) 10:17 12:25 22:5,8 46:6 49:24 53:19 54:1,6 55:3 114:2 134:23 knowledgeable (1) 162:12 known (5) 71:20 99:25 118:8 127:14,16 knows (3) 23:4 107:21 131:17	
---	---	--	---	---	--	--	--

legally (3) 21:10 122:25
123:1
legislation (9) 20:24,25 21:1
22:13 116:22 119:19
124:22 146:18 162:2
legislature (1) 161:24
legitimate (9) 6:12 20:18
23:6 28:2 50:20 72:11
73:9,11 100:8
less (2) 15:1 78:1
let (24) 23:10,14 33:18,24
36:18 42:17,23 49:4 53:8
67:8,9 71:1 83:7,11 90:5
106:10 115:15 128:10
129:1,15 138:22 152:8
160:10 163:13
lets (20) 13:17 17:18
19:16,16 27:21 39:2 41:16
54:13 57:17 68:10 90:22
92:12 115:21 120:19 123:6
129:11 136:25 138:20
144:4 148:13
level (3) 80:2 90:8 135:15
liaison (1) 87:23
liberated (3) 86:8 89:12
103:17
licence (32) 19:21 20:1
21:9,12,16 22:5,8 23:25
24:11,25 25:1 36:16
41:1,13 60:5,7,8 62:4,10
63:10,12,13 69:5,6 72:17
75:3 88:16 125:6
132:3,18,21 133:18
licences (7) 21:1-2 65:5
132:11,15 133:2,19
licence (1) 21:5
licensed (3) 25:2 74:17 164:7
licensing (1) 88:25
life (4) 4:24 71:13 110:15
141:23
lifetime (1) 8:9
light (1) 6:16
like (31) 2:7,19 4:17,18,23
7:24 26:15 27:23 31:23
33:12,13 50:8 61:11 75:16
78:2 80:12,17 81:1 83:3
95:19 102:17,25 120:8
124:8 134:9 138:6 149:2
159:1 160:21 162:14 164:2
likelihood (2) 126:16 135:25
likely (2) 40:7 66:2
likewise (1) 18:11
limited (7) 13:16 15:23 16:2
18:9 67:3 96:15 115:22
limits (1) 23:8
line (2) 12:9 137:1
lines (2) 121:5 162:21
linked (1) 81:9
list (1) 85:9
listen (4) 4:8 56:9,24 57:6
listening (2) 33:12 57:1
literally (2) 5:20 64:6
litigant (6) 3:24 8:2 29:14
32:16 44:12 65:24
litigation (7) 36:1 41:9 49:8
66:6,21 103:13 139:21
little (8) 5:17 8:6 17:14 18:3
44:16 52:11 128:5 161:8
live (3) 83:5,6 159:22
liver (6) 126:3 128:21,24
153:9,9,10
livers (2) 128:15 153:15
living (1) 153:23
loads (1) 55:10
lobby (4) 114:15,18 155:21
158:1
local (1) 15:1
location (4) 74:14 76:20
77:21 107:9
locations (2) 14:9 76:15
logistics (1) 14:20
london (1) 161:8
long (6) 44:12 54:11 71:22
87:20 143:4 157:24
longer (7) 58:8 67:6 92:21,22
93:20 103:10 142:12

look (16) 5:9 12:2,3,11
13:25 31:6 18 32:11,21,24
47:14 75:22 82:24 95:5
141:21 157:16
looked (5) 1:19 3:8 126:20
131:16 161:21
looking (11) 13:1 26:10 34:3
54:6 98:12 122:1
126:10,14 139:20 159:10
161:20
looks (2) 74:14 120:8
loose (1) 18:15
lordship (5) 33:3 48:25
67:17,18 68:7
lost (2) 74:2 156:5
lot (18) 2:9 4:2,24 14:22
41:25 49:14 54:19 59:22
65:9 75:8 96:24 100:1
124:6 128:2 131:20 132:19
147:15 161:21
lots (8) 49:16 128:19 132:24
135:20 153:24 154:2,10,15
love (3) 79:4 131:2,3
low (3) 14:14,16 127:2
lunchtime (5) 84:7,14,20
85:2 148:25
lung (2) 126:3 153:18
lv (1) 135:19

M

main (2) 56:7 120:3
majority (1) 151:23
makes (2) 51:20 70:18
making (12) 53:4 70:3
78:20,23 81:25 82:3,22
130:6 141:2 149:25 150:3
158:8
mammal (8) 19:24 23:18,22
88:13 115:25 117:5 118:21
123:11
mammals (1) 117:1
man (2) 67:20 129:16
manage (2) 13:13 18:2
managed (2) 69:14 93:6
management (6) 14:21
46:5,6,12 48:7 95:7
manager (7) 46:13 47:3,5,9
76:23,24 78:19
managerial (1) 82:11
mandate (4) 124:10,13,20,20
mandates (1) 124:14
manifest (4) 6:23 10:21
13:16 14:5
many (40) 1:18,20 2:6 4:12
8:2 14:11 15:9 38:4,5
43:6,11,14 44:10
45:13,14,14 60:4
61:8,8,9,12
83:10,10,10,10,20 91:11
97:7,19 101:13 115:10
120:15 133:6,6 135:7
136:11 140:11 152:5,5
157:9
marching (2) 158:22,22
mark (3) 120:8 121:22 122:5
marked (1) 90:21
market (5) 42:13 44:6
154:12 163:21,22
marks (3) 53:11 121:1
122:13
marshall (31) 12:17 14:24
15:7,22 16:1,2,2 18:8
35:25 41:24 42:7,7,13,24
43:15 71:19,22,25
85:11,14,19 115:3
129:10,16,17,23 130:7,13
133:22,23 164:1
marshalls (29) 15:6,9,13
16:19,19,19,20 17:25
18:1,7,15 26:17,18 35:9
42:1 43:1 44:25,25
45:5,6,6 47:1 53:23 71:7
86:11,20 111:25 115:6
143:19
massive (3) 26:23 111:5
139:15

material (2) 6:15 139:24
maths (1) 115:6
matter (5) 2:13 41:9 84:6
124:7 134:14
maybe (11) 1:19 21:18
36:19 42:5 75:23 79:11
96:8 99:16 110:4 130:4
143:22
mbr (74) 1:20 2:11 11:8
13:15,20
16:7,7,8,9,10,12,15,16,18,19,22
17:1,12 18:9,11 19:2,9
35:24 36:18 39:15 40:25
42:14 43:19 44:5,21 45:17
46:4,6,12 47:23 51:13
53:13 60:5 62:9 63:3,12
65:5,22 69:5,10 72:12
74:9,12 77:4 81:14 83:14
85:21 87:3,15,25 88:25
99:11,14 102:21,23
103:2,10 104:23 111:1
115:4 133:23 140:20
144:25 145:2,16 159:18
163:16,23,24
mbrs (1) 1:25
mean (21) 30:19 61:18 75:21
90:1,2 92:11,13,13 94:13
104:12 108:18 110:19
128:3,20 134:4 137:13
138:17 141:9 142:7 152:10
158:20
meaning (2) 61:21 140:7
meaningful (1) 43:21
means (7) 4:9 65:6,6 92:14
138:13 142:19 143:8
meant (3) 104:10,11 133:16
measures (1) 75:10
mechanism (1) 83:13
media (5) 37:20 76:3 93:25
111:13 158:11
medical (13) 11:7,12 13:21
42:19 43:21 44:23 114:22
116:13 122:19 147:17,25
150:10 152:19
medicine (11) 116:25 119:22
126:1,17 127:16 145:18
152:18 154:8,12,21 163:18
medicines (20) 19:23 20:10
21:2,21 23:16,21 88:12
115:23 116:9,18 118:22
125:7 126:25 129:8,15
130:4 137:15 145:23
147:12 154:17
meet (6) 11:15 14:17,25
43:8,11 87:1
meeting (1) 149:12
megan (1) 158:12
megaphone (1) 87:21
member (5) 46:20 101:13
104:8,15 107:7
members (21) 93:11,14
94:21,23,25 95:14
97:16,19,22 98:5,7 99:9
101:14,21 103:25
104:12,17,21 107:4,14,16
membership (1) 114:22
memory (5) 26:16 27:20
31:12 46:10 86:7
mending (1) 75:20
mention (2) 73:17 111:13
mentioned (4) 85:16 88:8
125:9 161:24
mentions (1) 34:10
merely (1) 66:25
merged (1) 155:25
met (3) 13:6 130:11,14
method (3) 130:12,15 152:3
methodologies (1) 147:16
methods (5) 127:21 151:23
154:13,16,19
mhra (1) 126:20
mice (3) 127:12 152:13,15
microphone (5) 52:8,10
55:9,12,14
microscope (1) 128:7
might (18) 12:14 44:13

47:15 56:3,19 57:7 75:15
93:17 106:10 107:13,13
112:9 120:11 139:13
144:5,7 152:12 153:5
miles (1) 102:18
millions (1) 157:4
mind (3) 49:10,12 66:9
miniature (1) 153:17
minor (10) 6:3 25:16 27:7
29:25 32:2,3 33:7,14
34:6,11
minority (1) 78:13
minute (10) 1:9,13 16:17
25:12 26:16 55:8 61:5
87:16 95:10 121:23
minutes (5) 5:20 48:23
49:11 64:6 149:2
mirror (1) 39:18
misread (1) 99:16
missions (1) 131:10
mistaken (2) 21:19 130:9
misunderstanding (1) 139:8
misunderstood (1) 124:18
model (3) 126:19 155:2
156:24
models (1) 126:2
modernising (1) 146:22
modernization (3)
146:8,20,22
molecule (2) 153:2,6
moment (12) 1:18,24 6:12
26:6 28:3 45:22 47:16 64:5
109:4 111:17 147:6 149:23
monday (2) 140:9 142:8
money (2) 130:6 133:18
monitor (3) 80:18,19 81:9
monitored (4)
80:13,17,24,25
monitoring (2) 80:14,16
monkey (2) 117:8 127:19
monkeys (1) 24:17
monsantos (1) 151:19
month (2) 78:9 134:11
months (5) 83:11 101:10
111:10 133:1 143:6
more (46) 1:20 8:25 17:17
18:4 27:7 33:8 34:6 46:2
51:24 56:24 58:3,7 70:16
71:25 72:4,7 78:14 80:7
84:8,16,25 85:8 89:8 93:17
95:6,13,24 96:12 97:9
98:23 102:15 113:5
123:20,21,21 124:1 128:22
131:9 135:7 142:3 147:15
150:5 155:17 158:15 159:6
162:12
morning (9) 1:12 2:15 6:24
7:3 25:23 30:19 48:23 89:6
164:21
most (18) 37:9 54:21 55:21
60:1,16,18 71:25 96:21
132:11 153:15 161:23
mostly (1) 100:16
mouth (1) 40:1
move (20) 59:19 67:15,23
77:9,20,23 78:10 82:13,25
96:19 127:23 148:7,7,8
150:23 151:5 153:22
158:18 162:6
moved (9) 13:13 78:6,9 79:9
81:17 83:15,21 131:8,11
movement (9) 74:15 75:20
95:25 96:2,4,16 97:3
134:11 160:25
moves (1) 153:19
moving (12) 35:14 57:10
58:22 73:8 78:6 79:9,13
81:14 95:5 101:23 107:8
129:20
mps (2) 158:22 159:9
ms (300) 1:5 7:8,10,12,15
2:2,4,5,13,21
3:5,8,11,12,16,19,19,21
4:1,5,7,20
5:7,10,12,13,14,15
6:8,9,13,15,22 7:6,13

8:20,21,23,24
9:5,6,6,10,11,15,15
10:5,8,10,10,19 11:2,6,6
12:22 13:15 15:2,2,19
17:5,6,7,15,20 18:20 19:10
20:16,17,19,21 22:3,12,18
23:1,4,7,11,13,14 24:6
25:24 26:5
27:8,11,15,19,20
28:10,16,18 29:1,10,12
30:6,15,23 31:12,16,21
32:1,5,9,18,23,25
33:1,7,11 34:3 37:11
38:22,24 39:4,16,16,21,25
40:6,10,12,15 43:17,18,23
44:4,9,11,19,24 46:23
47:11,13 48:5,13,22
49:14,19,20,22
50:15,17,19 52:14 55:2,10
56:14,16 58:5,8,10,11,15
63:19,21,23,25
64:5,10,11,15,17,22
65:1,2,4,17 66:8,17,20
67:11,25 68:9,17 72:13
73:18,21 82:7,21,23
84:10,11,12,18,19 85:8
86:17 88:23 89:17 90:7
91:9,10,11,12,13,16,17,19,25
92:19 93:11 95:9,10,13
97:10,11,13,21
98:8,9,10,12,13,21,24
99:9,9,25 100:12,24
103:11,14,19,24 105:17,21
106:3,7,22 107:3,20,21,23
108:4,5,11,14,21
108:8,19,23
112:4,6,15,21,22,24
113:2,3,7,8,8,13 114:4,4,8
119:21 120:10,18,21,23
121:8,13,20,24
124:8,12,14,18 128:10
129:1 130:23
138:7,9,13,16 139:19
142:8,9,9 144:3 145:9
149:3,7 162:10,11,17,25
163:4,5,6,8 164:18,19
166:3,5,9,13,15
munch (18) 1:11 39:9 41:3
91:8 93:5 98:13,16 109:9
112:5,6 116:23 119:23
123:21 150:2 163:3,8,11
164:14
multinational (1) 35:23
multiple (1) 31:3
murderer (1) 62:20
mushroomed (1) 161:2
must (5) 20:12 61:8,9 66:9
155:7
mute (1) 1:8
myself (6) 4:21 57:12 70:3
92:25 93:18 146:7

N

name (12) 9:7 12:9 18:8
41:20 105:23 107:18
113:9,10 139:9 155:23,23
156:1
narrow (1) 72:3
nasa (1) 131:10
national (1) 150:12
nature (2) 12:4 17:22
near (1) 154:20
nearly (2) 60:14 61:10
necessarily (6) 53:3 93:2
98:25 105:22 110:6 139:18
necessary (4) 92:21,22
143:1-2
need (61) 7:14 8:12 15:18
26:7 28:9 36:7,13 40:10,15
42:18,19 47:15 22:24
48:4,13,17 49:3,9 50:16
52:10 56:17 58:7 73:14
80:25 81:11 82:2 83:17
94:11 97:3,9 98:23 104:4
107:20 112:9 117:16
120:1,11 121:10,12 124:6

130:17 143:4,15 147:11
150:5,23 151:1,5,20
153:23 156:4 158:20
159:9,10 161:16 162:7
163:10 164:21 25 165:2
needed (4) 102:5,5,6 109:7
needs (12) 9:3 14:10 27:11
28:6,7 29:10 48:23 84:11
123:13 148:3 161:20 162:5
negative (2) 135:17 136:19
neutrally (1) 69:17
never (10) 83:8 102:2 104:2
110:19 130:11,14 134:12
139:16 146:7,13
news (1) 26:1
next (6) 41:22 87:13 90:19
96:10 112:16 136:25
nhs (1) 104:1
nice (2) 62:23,24
nicklin (332) 1:5,8,11,14,24
2:3,13 3:18,22 4:2,8,21
5:8,11,13,16,18 6:8,21
7:1,5,8,11,17,20,22
8:1,6,18,20,24 9:2,14
10:3,7,9 11:4 15:11,14,18
17:13,18
18:3,6,14,18,20,23 19:6
20:18,23 22:10,16,21
23:2,10,14 24:1,3,13
26:7,10,13 27:19,21
28:6,15,17,20 29:12
30:12,22 31:8,15,19
32:7,13,22,25
33:5,10,21,23 34:2,13,15
35:14 36:1 37:14,16
108:8,19,23
39:2,14,17,19,24
40:2,9,11,14,23 41:14,18
42:17 43:9,18,24 44:11,20
45:18,25 46:16,18,22
47:18 48:2,9,12,20
49:2,6,13,18,21
50:2,5,8,12,25 51:4
52:9,15,18,21,23 53:8,16
54:8,18,24 55:2,8,12,15
56:16,23 57:5,20,25
58:7,9,13 60:15 61:7,21,23
62:9,16 63:20,24
64:4,9,12,18 65:3,8,24
66:13,20 67:19
68:8,10,17,24 69:2,4,17,20
70:1,3,8,12,14,17,21
71:12,16 72:6,9
77:13,17,24 79:13,19,22
80:1,6,11,15,21 81:3
82:4,7,21 83:17
84:1,4,9,17,19 85:2,7
86:9,17 88:5,7,22 89:6,14
90:3,16 91:8,15,17,20
92:12,18 93:10 95:9,11
97:9,18 98:9,17,23
99:5,8,21 100:8,17,20,23
103:11,18
105:4,7,11,15,20
106:2,6,15,18,21
107:2,20,24
108:2,5,13,18,22
109:9,12,25 110:8,22
111:21 112:2,5,9,13,17,21
113:1,3 115:13 116:21
119:9,15 120:1,18,23
121:15,17,23 122:1,4,8,11
123:3 124:6 126:12
129:18,20 130:16,22
138:21 139:8,17 140:6,8
141:2 142:1,3,7 145:8
146:16 148:25
149:5,18,21 150:7,14
152:8 158:4,19,25 159:16
161:3 162:10,16
163:3,7,13 164:4,14,17
165:5
night (3) 1:15 120:7 149:1
nizana (1) 7:22
nobody (8) 29:17 48:2
129:4,14,22 130:4,9

151:14
nonanimal (16) 118:5 127:21
128:2 130:12,15 147:15
151:23,25 152:3,14
154:13,16,19 23 155:11,16
nondog (1) 137:16
none (2) 36:15 98:20
nonhuman (6) 117:8 118:9
119:2 123:15 124:2,3
nonrodent (4) 117:5 118:25
123:14 141:14
nonsense (1) 141:24
nonstop (1) 32:4
nor (1) 115:17
normal (8) 53:12 74:18 76:11
108:17,22,24 109:1 139:14
normally (4) 79:12 87:12
107:10 108:8
note (3) 4:9,21 129:14
notes (1) 4:15
nothing (2) 51:20 84:21
notice (1) 101:4
noticed (1) 83:8
nowhere (1) 67:4
npv (1) 135:10
number (23) 13:16 14:15,15
27:3 28:12 67:12 86:21
90:11 97:6,7,8,16,17,22,23
100:9 101:15 124:2 127:2
129:12 131:24 144:22
157:3
numbered (1) 38:25
numbers (5) 44:4,7 87:8
121:17 123:18

O

oath (1) 69:7
object (4) 6:9,10 31:13 67:7
objected (1) 27:24
objection (3) 6:11 70:18 80:7
objects (1) 112:1
obligations (1) 119:16
observed (1) 60:1
obstructing (3) 36:4 58:17
59:11
obstruction (1) 57:17
object (1) 164:6
obtained (2) 10:22 67:5
obviously (13) 17:16 69:22
95:20 102:3,14 143:3
144:7 147:3 148:2 159:1
160:2,12 165:2
occasion (4) 94:19,24 101:18
102:7
occasionally (1) 93:15
occasions (5) 66:3 68:17,19
89:20 94:1
occupation (1) 113:9
occurred (3) 25:17 30:1
134:12
occurs (1) 4:10
oclock (2) 85:3 93:12
october (4) 116:15
117:14,15,15
odd (1) 79:10
offensive (1) 141:24
offer (5) 2:22,23 3:12,13,15
offered (1) 5:3
offering (1) 1:22
offers (1) 2:2
office (16) 20:6 21:3,5 23:23
132:16 133:3,9,10,12,18
134:14,20,20,23,25 164:8
official (2) 18:7,9
often (4) 59:5 71:9 96:5
101:7
oh (12) 7:5 52:23 55:15
60:19 62:15 106:12,15,21
110:21 112:12 129:19
142:2
okay (164) 1:1 2:3,5 4:20
5:13 7:22 8:20 9:4,14
10:3,7 15:10,21 16:21 17:9
18:18 19:15 20:21 22:2
24:10,13,16 25:10 26:4
28:17 34:15,16 35:2,9,16

<p>36:1 38:4,23 39:17,20,24 40:20 41:10,15 42:23 44:11 45:24 47:2,24 48:1,6 49:5 50:25 52:1 53:18 54:4 55:15 56:6,23 57:2,20,22 58:7 59:16,20 60:3 61:8 63:7 65:8 66:13 69:17,25 70:13,24 71:5,5,17 72:15 73:17 75:14 76:4,18 77:24 78:25 82:20 83:5 84:1,4,17 86:9 87:3 89:18 90:6 91:11 92:10,19 93:11,17,20,24 94:6,19,25 95:5,13 96:4,8,19 97:5 98:2 99:9 100:23 101:2,7,18,25 102:11 103:1,7,14,24 104:16,23 106:2,6,12,21 107:2,12,23 108:14 109:7 111:9 112:12 115:21 116:24 117:6,16 118:15 119:25 121:4 123:6 124:22,25 125:15 129:18 131:5 135:6 136:25 137:14 138:3 140:14 141:2 142:15 143:17 144:21 145:3,15 146:7 148:13 153:8 157:8,25 158:6 162:9,11,25 163:5</p> <p>old (4) 117:9,10,11 160:22 once (7) 56:25 57:16 83:6 101:13 124:1 139:3 143:7</p> <p>ones (1) 99:12 ongoing (2) 90:13,25 open (4) 2:2,23 27:22 77:20 opens (1) 134:8 operate (1) 88:25 operating (1) 11:8 operation (5) 44:22 45:8 46:24 83:13,23 operations (2) 46:23 66:10 opinion (4) 2:10 59:24 122:19 160:12 opportunity (6) 29:11,20 30:17 33:2 84:13 91:9 opposed (3) 33:15 81:7 141:10 opposition (5) 34:8 36:8 135:14 136:7 161:6 option (4) 2:5 144:23 146:13,17 opus (3) 38:22 47:15 112:15 oral (1) 165:4 ordeal (1) 49:3 order (8) 8:12 87:10,10 118:22 123:11 142:12 143:3 152:13 orders (3) 143:5,7 144:9 ordinarily (1) 3:22 organisation (6) 64:16 113:11 130:24 155:20 156:9 157:5 organisations (6) 114:25 115:1 133:25 155:24,25 161:4 organised (1) 149:12 organoids (3) 126:3 128:15 153:15 organs (1) 153:16 original (1) 35:12 originally (1) 26:22 others (2) 61:24 115:11 otherwise (1) 147:11 ought (4) 31:17 33:2 69:24 70:2 ourselves (3) 88:3 131:2 146:23 outcome (1) 140:12 outlandish (1) 17:2 outrageous (1) 5:21 outside (8) 22:19 51:13 53:13 64:4 72:6 73:12 157:10 159:18 over (10) 35:9 43:6 84:19 110:12 112:10 115:1 136:4 143:6 146:21 161:14 overall (1) 61:5</p> <p>overlap (2) 16:13 19:11 overnight (4) 5:6,19 91:3 164:20 overspeaking (7) 60:11 73:4 81:20 89:4 98:3 104:9 154:23 oversubscribed (1) 87:3 overview (1) 149:24 overwhelmed (2) 1:15 2:16 overwhelming (1) 6:20 own (17) 12:18 14:8 15:25 16:19,19 18:1 28:24 61:25 62:1,15 63:25 66:3 104:18 105:12,19 106:19 107:11 owned (2) 15:25 47:4 owning (1) 53:23 owns (1) 129:17</p> <hr/> <p style="text-align: center;">P</p> <hr/> <p>pages (2) 9:22 121:16 pagination (1) 91:21 paid (10) 15:11,22 16:25 17:23,25 18:1,4,14 104:12 133:23 pair (1) 74:13 paper (6) 135:9 149:9,12 150:17,25 158:6 papers (1) 113:23 paperwork (1) 1:17 paragraph (42) 5:25 6:13 7:6 8 17:6,16 19:17 25:13 28:22 37:13 47:11,13 51:5 52:1,24 53:18 55:7 59:7 73:22 74:3 88:11,24 97:12 115:15 119:20 120:21 121:6,8,11,17,21,24 122:6,7 129:12 135:9 136:25 142:16 155:6 157:8 163:14,15 paragraphs (3) 36:22 37:11 68:1 parallel (1) 96:17 parameters (6) 22:22,24 49:8 66:1,21 124:12 paraphrase (1) 42:23 paraphrasing (1) 36:21 pardon (4) 47:7,12 86:1 161:2 parent (5) 11:9,11 16:8 74:8 110:11 parliament (3) 119:15 140:22 158:23 parliamentary (3) 120:13,16,25 part (25) 2:11 18:23 36:18 40:16,18 43:19 45:7 48:24 71:7 74:5 75:17 82:16 96:22,23 97:10 108:5 110:4,23 116:9 120:3 130:2 133:10 140:17 155:1 159:22 particular (3) 72:1 96:1 107:19 particularly (2) 30:4 124:16 parties (1) 21:3 parts (2) 128:13 130:3 party (2) 120:12,15 pass (3) 112:9 128:17 154:18 passage (4) 58:18 59:13,14,15 passed (2) 132:14,15 past (11) 3:12,14 53:19 54:2,6 78:9 79:8 83:11,11 87:19 132:18 path (1) 67:10 pathetic (1) 6:19 pathway (1) 154:4 patients (1) 104:2 patrols (1) 91:3 pattern (1) 83:9 pause (1) 1:24 pay (2) 16:20 115:5 paying (1) 17:1 payroll (1) 18:2 pays (5) 15:12 16:17,18 18:6 104:13</p>	<p>peaceful (2) 58:18 73:14 peculiar (1) 135:4 penultimate (1) 163:15 people (50) 26:2 31:6,17 54:4 56:11 57:13,14 59:2 62:3,4 63:1 74:15 75:8,10 76:21 80:23 81:6 87:9 89:11,11,12 90:21 95:3,5 99:2,14 104:19 105:18 127:15 130:5 133:16 134:9 136:12 140:11,19 142:22 143:3 147:17,25 148:2 152:12 156:7 157:6 158:21,22 159:8,24 161:7,13 162:17 percentage (5) 14:16 123:21 126:16 135:23,25 percentages (1) 135:10 perfectly (4) 3:18 23:10 28:2 44:21 performed (1) 155:9 perhaps (13) 26:15 27:20 29:8 31:12 54:14 57:7 119:10 120:7 121:5 127:18 134:9 138:4 151:22 perimeter (10) 75:5 95:1,5,15 96:5,10,14,15,24 97:4 period (2) 34:8 101:16 periods (1) 104:14 perjury (1) 46:19 permanent (1) 106:25 permission (1) 164:6 person (9) 8:2 20:4 22:2 24:12 29:14 32:17 44:12 71:11 88:1 personal (3) 84:22 97:5 105:19 personally (11) 62:7 64:10,15 72:21,25 73:2 83:10 97:15 100:24 150:21 155:20 personnel (1) 99:18 persons (5) 9:12,16 10:5 75:1 112:25 perspective (1) 145:14 petition (1) 29:5 petitions (1) 158:25 petri (1) 128:6 pets (1) 134:17 pfiizers (1) 151:18 pharmaceutical (2) 114:24 152:2 phase (1) 111:22 phone (1) 131:9 phrasing (1) 97:21 physically (1) 92:15 pick (1) 128:24 picked (1) 53:24 piece (2) 22:13 141:15 pig (4) 117:8 119:1 123:14 127:19 pigs (2) 141:11,18 piste (2) 86:9 110:22 placards (2) 92:4 102:12 place (11) 26:2 42:14 49:24 55:3 70:22 80:9 93:5 106:25 108:19 112:7 162:22 placed (1) 94:9 plan (3) 26:22 35:12,25 planned (2) 27:23 103:10 planning (15) 3:7 25:18 27:9,16 29:6 30:1 33:17,19 34:18,22 35:3,4,6,18 164:6 plans (5) 27:1 35:11,17,22 111:6 play (2) 38:20 96:8 played (2) 57:23 132:24 plays (1) 2:11 pleasant (2) 72:22,22 please (30) 7:7,7 9:2,6,16,17 10:2,11 11:3 20:15 21:23,25 22:4 25:24 28:19 39:19 51:25 64:5 66:23 68:11 84:22 100:5</p>	<p>113:8,18 120:21 121:13,14 128:10 129:19 141:12 plenty (1) 152:5 plus (1) 126:19 pm (7) 51:3 85:4,6 93:7 112:18,20 165:7 pointed (2) 6:13 73:5 points (6) 50:21 53:3,5 67:18 135:7 154:4 poisoned (1) 141:1 pole (1) 40:7 police (25) 44:13 56:12 57:8 87:23 88:1,3,4,7 92:7,9 93:20,22,24 94:1,2,3,4,21 98:14,16,17 99:1 102:13 133:21 134:21 policewomen (1) 133:20 policewomen (1) 133:21 policies (1) 150:25 policy (1) 150:11 ponies (1) 118:10 position (9) 4:13,22,22 20:2 25:12 29:16 31:9 70:5 124:8 positioned (1) 94:13 positions (1) 132:7 possibility (2) 15:16 65:15 possible (8) 43:7 49:21 85:19 144:7 150:1,2,4 163:2 possibly (9) 45:15 91:5,6 138:7 143:22 144:12 145:19 151:12 163:19 poster (1) 111:17 potential (16) 19:23 20:10 21:3,20 23:16 88:12 115:23 116:25 125:25 129:8,15 130:4 145:23 153:4 154:17 156:23 potentially (2) 64:25 164:22 powerful (1) 151:17 practical (2) 8:6 118:6 practicality (1) 151:1 practice (5) 124:15 125:5 129:24 154:14 164:12 practices (1) 156:15 preceding (4) 56:5,21 121:21 122:6 precise (2) 44:14 83:23 preclinical (9) 125:22 126:19,23 128:6,12,16 144:24 145:17 163:17 predicted (2) 135:17 136:20 prediction (1) 135:11 prefer (2) 103:6 157:19 preferable (1) 157:22 pregnant (2) 125:12,13 prejudice (1) 66:24 premises (1) 59:18 preorders (1) 143:14 prep (1) 164:25 prepared (3) 107:25 161:14 164:10 presence (2) 93:22,24 present (4) 49:23 54:22 55:17 149:11 presentation (1) 131:1 presentations (1) 149:8 presented (3) 5:19,20 143:18 presenting (1) 2:15 presses (1) 148:20 pressick (7) 5:15 6:15 8:22,23,24 9:6,8,10,11,15,21 10:10,19 11:6 13:15 15:2 17:6,7,20 18:20 19:10 20:19 23:4,11,14 27:20 31:12 33:7,11 34:3 39:4,16 40:15 46:23 48:5 49:14,19,20,22 50:15,17,19 55:2 56:16 58:11,15 63:21 64:5,10,15 65:2 68:17 72:13,16 73:18 82:7,21,23 84:18,19 85:8 86:17 88:23 89:17 90:7 91:10,17 98:10,24 107:21 112:6 166:3 pressicks (10) 5:25 6:13 7:12</p>	<p>24:6 44:4 48:13 64:22 97:11 98:12 103:19 pressure (3) 159:10,13 161:19 pressures (1) 4:25 pressurised (1) 3:3 pretty (2) 2:20 150:2 prevented (1) 102:7 previous (6) 52:4,6 54:1 143:18 146:14,18 previously (1) 3:16 price (1) 140:13 primary (1) 102:3 primate (3) 117:8 119:2 123:15 primates (3) 118:9 124:2,3 principles (2) 116:12 155:8 print (2) 7:22 8:13 prior (5) 6:2 25:15 29:24 53:23 56:11 prison (1) 46:21 private (1) 107:11 privilege (1) 2:1 privileged (4) 74:25 88:3 103:4 110:18 probably (14) 2:24 68:1 77:19 93:13 96:20 101:10 105:18 112:10 124:24 133:6 143:11,12 144:9 161:22 probe (2) 23:2 30:2 problem (7) 4:2 14:13,20 17:9 74:11 139:17 149:5 problems (1) 87:14 procedure (5) 68:22 69:12 71:2,4 108:7 procedures (10) 20:25 21:14 63:18 69:9 117:20,25 123:22,25 124:5 127:1 proceed (1) 164:23 proceedings (8) 1:3 3:2 5:2 30:16 41:3 139:22 142:5 162:21 process (11) 6:17 34:24 35:18 67:6 105:5 107:21 108:6 132:22,25 153:14 154:5 processes (2) 28:1 97:2 produce (5) 87:1 138:25 140:3 150:13 163:24 produced (4) 8:12 136:5 149:17 150:7 producing (1) 163:23 product (2) 125:20 132:3 production (1) 44:6 productive (1) 159:13 products (2) 139:7,7 professions (1) 147:17 professor (2) 150:9 152:21 profile (4) 27:5 32:6 33:16 34:21 programme (1) 99:15 program (17) 21:9 22:1 24:10 36:16 38:4 40:22 41:13 60:4,7 62:4 63:10,13 132:11,15,17,21 133:2 prolonged (1) 34:7 prompt (1) 4:16 properly (4) 41:1,4 68:23 132:10 property (1) 75:5 proposals (2) 34:4,8 propose (2) 3:5 65:8 prosecutions (1) 46:4 protect (3) 84:25 104:3 123:11 protected (2) 117:22 118:8 protection (7) 24:15,18,19,21 25:6 53:21,24 54:4,13 55:20,22 56:3 59:4,16,20 60:3,9,12,20,23,25 61:14,17 62:21,24 63:1,7,10,14,17 69:7 71:5,22,24 72:19,25 73:5,9,17 74:4,16,19,22 75:3,7,13,21</p>	<p>73:9,14 81:5,10 90:12 102:25 103:20 109:5 111:18 140:10,11 159:5,6,13,19,21,22 160:7 161:7,11 protester (10) 51:8,11,19 53:11,12 57:13 73:12 89:23 90:9 107:19 protesters (33) 51:9,21 53:16 69:21 70:5 73:15 75:12 88:1 89:25 94:9,10,22 95:16,20,22 96:11,20 98:15 100:4,11,15,16 101:19,20,23 102:12,14 103:2,16 107:17 108:17 158:11 160:17 protesting (17) 32:4 51:15 53:12 70:9 72:12 92:11 96:22 140:13,19 151:21 158:16,17,19,21,25 161:7,18 protests (12) 5:23 6:3 25:16 27:6 89:16 90:12 102:21 104:6 151:7 160:7,13 162:19 prove (3) 118:22 140:9,15 provide (10) 8:9,16 11:11 13:21 21:14 27:12 33:24 132:12 134:7 136:13 provided (10) 10:21 12:1 21:2 27:8 30:8,10,13 31:17 39:6 107:10 provider (1) 43:22 providing (1) 42:24 proving (2) 129:7 140:14 public (4) 42:25 53:22 54:3 114:20 published (1) 123:24 pull (2) 5:21 19:5 pulled (1) 107:17 puppy (16) 60:24 62:19,21,22 63:2,5,22 64:24 69:21 70:5,18 71:18 72:7,19,20 73:6 pure (3) 86:20 110:25 111:9 purely (2) 55:17 77:21 purpose (9) 11:7,12 33:5 64:12 69:13 71:2 109:2 139:10 142:4 purposely (2) 69:16 96:11 purposes (1) 114:10 pursue (2) 46:17 67:17 push (2) 33:3 35:20 pushed (3) 2:25 95:14 96:9 pushing (1) 96:23 putting (10) 13:19 33:15,20 34:18 46:12 53:3 57:13 65:1 76:20 82:3 pyramid (1) 47:2</p> <hr/> <p style="text-align: center;">Q</p> <hr/> <p>q (327) 9:10,20 10:2,13,16,19 11:11,14,19,22 12:1,7 13:1,8,15,25 14:3,5,7,11,17,23 15:8,10,25 16:6,16,21,25 17:22 19:20 20:4,8 21:5,16,18,25 24:20 25:3,5,10,15,22 26:20,22 27:3 35:2,9 37:1,5,10,21,23,25 38:4,11,13 42:4,9,11,14 43:3,6,13 45:3,5,10,12,14,17 46:10 47:7,9 51:13,17,19,23 52:1 53:21,24 54:4,13 55:20,22 56:3 59:4,16,20 60:3,9,12,20,23,25 61:14,17 62:21,24 63:1,7,10,14,17 69:7 71:5,22,24 72:19,25 73:5,9,17 74:4,16,19,22 75:3,7,13,21</p>	<p>76:4,7,12,18,21 77:1,8 78:8,12,24 81:22 82:2 85:14,19,24 86:1,3,7,14 87:3,8,13,19 88:17,20 89:25 91:2 92:6,10,25 93:14,17,24 94:6,15,17,19 96:4,8,19 97:5,23,25 98:2,4 99:16 100:7 101:2,7,11,13,18,21,25 102:11 103:1,7 104:10,12,16,23 107:12 109:23 110:17,19,21 111:9,14,16,19 113:13,17,21,23 114:1,15,17 115:3,5,8,10,12,17,21 116:2,8,16,20 117:3,6,9,11,16,20,24 118:15,19 119:3,6,8 120:17 121:5 122:18,25 123:16,18,21 124:5,25 125:10,13,15,17 126:6,8 127:3,7,9,20 128:1,9,17,23,25 129:14 130:4,8,13 131:5,19 132:1,8,14 133:4,7,10,12,16,20 134:8,16,25 135:3,6,14,18 136:2,10,14,16,22,25 137:8,12,14,21,25 138:3 141:12,19,24 142:24 143:17,24 144:11,13,17,21 145:3,7 146:5,11 147:2,4,7,10,17 148:5,12,19,24 150:25 151:10,16 152:3,6,18 154:5,8,11,21 155:1,12,14,19 156:3,9 157:3,8,16,25 158:3 160:24 161:2,13 162:5 qualify (1) 97:7 quality (1) 141:23 quantities (1) 11:24 quantity (1) 11:13 quarrel (1) 33:6 quarters (1) 135:15 question (50) 6:14 16:23 17:2 20:19,20 21:9 22:3,7 23:4,6,19 38:19 39:22 40:23 44:3,9 46:2 56:6 63:23 64:1,18 65:10 66:15 70:24 71:18 80:6,21 89:8,22 90:5,18 91:24 97:18,20 98:25 100:8,9,13 106:12 108:15 109:11 111:24 118:7,13 121:9 123:3 126:7 130:23 148:3 163:13 questioned (1) 136:11 questioning (2) 98:24 139:18 questions (45) 3:7 4:5,9,17,19 8:13 10:20 12:22 15:3,19 17:12 22:23 26:14 27:22 28:2,13,23 29:6,23 31:3 32:19,23 33:24 44:14 45:19 46:8 49:9 50:8 52:3 66:22 67:8 68:5,13 72:10 84:11,13,16 90:4 91:7,10 106:5 114:5 149:10 165:1 quickly (1) 52:12 quietly (1) 67:8 quite (25) 3:14,19 17:11 20:1 44:2 45:16 67:13,13 71:9 93:18 96:4 98:1 100:6 104:2,19 105:6,25 130:1 132:19,21 137:24 143:4 145:19 154:25 163:19 quotation (2) 120:8 121:25 quotes (5) 55:22 121:1,22 122:5,18 quoted (1) 116:18</p> <hr/> <p style="text-align: center;">R</p> <hr/> <p>rabbits (1) 5:22 rails (1) 67:21</</p>
---	--	---	---	--	--

raise (1) 6:10
 raised (2) 68:1 103:3
 raising (2) 28:18 29:1
 range (2) 13:5 158:21
 rare (1) 132:21
 rate (1) 136:6
 rather (8) 18:15 19:16 31:3
 79:14 80:11 104:21
 130:12,15
 rawl (3) 148:18 149:11
 150:10
 reached (2) 5:4 58:3
 reaction (1) 139:11
 reactions (1) 127:11
 read (25) 7:9 29:11,20 30:17
 31:3,14 47:19 48:24 53:25
 60:10 121:5,7,11,12
 122:17 141:8 145:20
 148:24 150:15,15,18,20,21
 151:4 157:11
 readily (1) 87:6
 reading (1) 133:3
 ready (2) 8:20 91:18
 real (5) 65:12 66:24 78:13
 144:23 157:9
 really (25) 16:10 51:8 62:23
 65:4,21,22 68:6 81:12 82:2
 95:19 111:21 120:2 122:6
 126:24 128:22 129:3 135:5
 136:10 138:2 143:13
 144:21 149:3 150:22 151:2
 159:9
 reason (15) 6:10 14:19 16:4
 36:22 42:4 56:4 70:8 72:9
 78:16 79:13 81:8 85:11
 86:19 110:9 141:10
 reasonably (1) 80:3
 reasons (12) 13:19,20 36:13
 47:23 48:3 87:17
 100:3,21,22 103:5 124:15
 151:13
 rebellion (4) 89:11,19 90:24
 91:3
 recall (6) 34:17 35:3,4,4
 62:17 88:24
 recalled (1) 72:20
 recapitulate (1) 156:25
 receive (1) 134:7
 received (1) 101:2
 recent (1) 153:15
 recently (2) 92:25 150:12
 recognise (1) 39:14
 recollection (6) 33:14 35:7
 46:13,16 55:17 79:5
 recording (2) 80:8,8
 records (1) 52:9
 recounted (1) 54:19
 recovery (1) 133:14
 rectifying (1) 109:4
 redacted (3) 41:19,20,21
 redrafting (1) 133:5
 reducing (1) 131:24
 reduction (3) 148:22 149:23
 150:3
 reexamination (2) 112:4
 163:6
 refer (17) 5:24 20:11 28:7,9
 37:4 42:11 51:5 52:4 53:18
 59:5,16 61:4 75:23 91:13
 94:8 100:5 116:3
 reference (6) 22:12 51:25
 92:3 94:25 98:1 100:5
 references (1) 59:22
 referencing (3) 28:13,18
 37:20
 referral (1) 91:14
 referred (5) 9:24 23:5 47:20
 52:13 119:20
 referring (10) 8:10 22:11
 46:11 52:16 92:15,16
 97:10,12 98:3 149:19
 refers (8) 12:13 16:13 49:14
 73:18 74:1,3 122:15,23
 refinement (3) 148:22
 149:22,24
 refining (1) 131:24

reflect (1) 3:17
 reflection (1) 70:22
 reform (1) 151:1
 refrain (1) 66:23
 refresh (2) 26:16 94:12
 refusal (1) 64:22
 refuse (1) 46:3
 refused (7) 125:5
 132:5,8,11,18,19 136:2
 refute (1) 78:3
 regard (1) 98:4
 regarding (3) 37:7 98:15
 103:24
 regime (2) 29:21 140:1
 registered (1) 18:11
 regret (1) 2:18
 regroup (2) 48:25 49:4
 regularly (1) 83:19
 regulated (2) 74:17 134:2
 regulation (4) 116:20 122:19
 133:8 134:5
 regulations (9) 88:15
 116:10,19 117:10,11
 118:21,24 119:20,23
 regulators (4) 148:4,5,6
 152:14
 regulatory (15) 110:9 121:3
 122:8,14,17,23 123:5,8
 124:5 126:25 133:25
 137:14,22 144:24 150:18
 rejected (2) 3:13 35:22
 relate (1) 119:13
 relates (2) 24:15 73:23
 relating (4) 5:23 62:18 74:12
 117:21
 relation (9) 2:1 4:13 29:14
 36:2 48:13,16 59:22 81:14
 100:21
 relationship (1) 134:6
 relax (1) 158:13
 relaxed (1) 77:10
 relevance (17) 28:24 39:22
 43:17,18 44:7,14 65:10,19
 66:1,9,14,19 67:3,7 72:8
 104:5 142:14
 relevant (23) 20:23 28:20
 35:15,19 36:15 40:23
 41:8,12 45:18,23 46:18
 58:10 63:19 64:24 65:6
 66:2,11 67:1 68:6 86:18
 103:13 125:14 140:6
 relied (1) 30:7
 reluctance (1) 64:23
 rely (2) 6:24 125:19
 relying (1) 30:20
 remain (3) 2:23 114:4 137:3
 remaining (1) 103:10
 remember (14) 33:19,20
 45:15 46:23 49:7 55:16
 75:24 82:8,9 94:12,17
 99:11 148:17 164:24
 remembers (1) 56:20
 remind (1) 60:13
 reorders (1) 143:14
 repeat (2) 41:6 67:22
 replace (3) 99:12,14,17
 replacement (4) 148:22
 149:22 150:5 154:9
 replacements (2) 131:23
 154:10
 report (10) 29:4
 148:18,19,20 150:8,13,21
 153:6 154:22 164:24
 reports (1) 138:25
 represent (1) 129:9
 representation (1) 2:17
 request (2) 10:23 88:16
 requested (3) 12:15 87:12
 132:13
 require (2) 118:21 146:17
 required (12) 21:10 22:9
 71:9 77:14 86:25 89:2
 107:8 122:16 128:17 146:1
 150:4 155:5
 requirement (24) 19:23
 20:10,12,14 21:6,20,24

22:11 23:5,16,20,23 24:7
 87:7 88:12,17,20 89:7
 116:2 123:10 145:11,12
 146:12 161:25
 requirements (5) 13:21
 21:12 88:14 89:1,3
 requires (9) 115:23
 116:17,25 124:9 133:25
 145:6,7 154:24 155:4
 research (57) 11:7,12 13:22
 21:15 42:19 43:21 44:23
 54:8 63:9 99:25 113:12
 114:11,14,16,21,23,23,25,25
 118:2,4,12 124:17
 128:2,3,12,16 129:4,5,10
 130:19 131:4,21 133:14
 142:11,18 146:3 147:25
 148:23 150:11,11,18
 151:13,15 152:19 155:7
 156:8 157:9,20,22
 159:4,25 160:6,8,19,21,23
 researched (1) 54:4
 researchers (3) 136:5,11
 137:2
 resolving (1) 5:2
 respects (2) 4:12 8:2
 response (3) 25:17 30:1
 162:23
 responsibility (11) 19:12
 20:6 41:2 78:25 79:2
 81:13,15,17,19,20,20
 responsible (5) 20:2,4 47:5
 48:5 159:11
 rest (3) 59:21 82:8 151:4
 result (5) 34:17 68:20,25
 90:24 140:25
 119:6,8,19
 seconds (1) 102:15
 section (12) 22:14,17
 24:14,20 25:5 37:4 51:6
 52:4,16,20 116:18 117:21
 sections (1) 116:6
 sector (13) 134:3,13 136:18
 137:17 151:11,16,24
 158:10,13 160:3,6,19
 161:14
 security (17) 75:8,10,11
 89:9,16,18,22
 90:8,14,17,21 93:13,13,16
 103:14,20,22
 see (48) 8:10 9:20 10:13
 12:3,7,8,11 13:1,16,25
 14:3,5 19:17 24:2 25:20,24
 33:2,11 40:21 44:20 50:20
 55:15 58:7,12 62:3 67:3
 74:20 80:23 85:3 87:8
 95:7,20,22,22 96:21 121:2
 125:21 129:3,10 138:22
 139:10 153:10,20,22 154:1
 159:5 164:25 165:5
 seeing (5) 71:14 95:19
 96:20,22,25
 seeking (2) 40:2 74:10
 seem (2) 31:2 41:24
 seems (7) 6:12 28:12 29:4
 31:22 58:21 93:3 122:20
 seen (25) 1:21 29:11 31:1
 39:5,12,13,16 51:21
 58:14,17 73:19,24 78:12
 79:19 87:21 95:1,2,3,16
 100:24 108:8 136:17
 148:5,6 164:23
 selection (1) 13:14
 sell (5) 43:6,14,14 71:7
 164:10
 send (1) 8:14
 sending (2) 13:22 106:23
 senior (7) 16:14 46:4,5,6,20
 48:7 57:12
 sense (2) 87:9 104:20
 sensible (1) 53:4
 sent (18) 7:2,4 26:11 45:23
 47:19 97:15,19 98:5,6
 120:6 128:20
 132:6,19,23,23,23 148:25
 149:2

S

saturnday (1) 41:13
 save (3) 6:3 25:16 34:11
 saving (1) 71:13
 saw (5) 1:20 93:25 143:21,21
 157:14
 saying (29) 18:15 20:14
 21:25 22:7,13 23:8 27:17
 46:21 48:2 52:19 55:22
 65:18 73:15 83:19
 88:20,23 110:2,3 119:14
 124:19 127:24 138:9,11
 147:10,12 150:25 153:13
 157:19 162:5
 scale (1) 35:7
 scared (1) 82:14
 schedule (4) 41:18 69:15,16
 116:9
 science (7) 120:13 125:18
 133:8 134:5 136:22 160:9
 161:22
 scientific (7) 20:25 21:13
 117:20,25 118:2 148:14
 155:8
 scientist (1) 115:17
 scientists (2) 153:8 160:18
 scope (1) 139:21
 scott (2) 129:16 130:7
 screen (2) 58:5 156:23
 screened (1) 153:4
 scrutinised (1) 136:11
 scrutiny (1) 161:23
 scum (1) 60:24
 seat (1) 113:3
 second (3) 112:22 121:2
 156:13
 secondary (5) 116:22,24
 119:6,8,19
 seconds (1) 102:15
 section (12) 22:14,17
 24:14,20 25:5 37:4 51:6
 52:4,16,20 116:18 117:21
 sections (1) 116:6
 sector (13) 134:3,13 136:18
 137:17 151:11,16,24
 158:10,13 160:3,6,19
 161:14
 security (17) 75:8,10,11
 89:9,16,18,22
 90:8,14,17,21 93:13,13,16
 103:14,20,22
 see (48) 8:10 9:20 10:13
 12:3,7,8,11 13:1,16,25
 14:3,5 19:17 24:2 25:20,24
 33:2,11 40:21 44:20 50:20
 55:15 58:7,12 62:3 67:3
 74:20 80:23 85:3 87:8
 95:7,20,22,22 96:21 121:2
 125:21 129:3,10 138:22
 139:10 153:10,20,22 154:1
 159:5 164:25 165:5
 seeing (5) 71:14 95:19
 96:20,22,25
 seeking (2) 40:2 74:10
 seem (2) 31:2 41:24
 seems (7) 6:12 28:12 29:4
 31:22 58:21 93:3 122:20
 seen (25) 1:21 29:11 31:1
 39:5,12,13,16 51:21
 58:14,17 73:19,24 78:12
 79:19 87:21 95:1,2,3,16
 100:24 108:8 136:17
 148:5,6 164:23
 selection (1) 13:14
 sell (5) 43:6,14,14 71:7
 164:10
 send (1) 8:14
 sending (2) 13:22 106:23
 senior (7) 16:14 46:4,5,6,20
 48:7 57:12
 sense (2) 87:9 104:20
 sensible (1) 53:4
 sent (18) 7:2,4 26:11 45:23
 47:19 97:15,19 98:5,6
 120:6 128:20
 132:6,19,23,23,23 148:25
 149:2

sentence (6) 17:19
 56:4,5,6,7 150:16
 sentences (1) 56:22
 separate (4) 62:18 86:16
 89:1 93:8
 separately (1) 108:1
 september (2) 55:16 117:15
 series (6) 26:1 27:4,25 28:8
 34:21 39:6
 service (2) 42:25 134:7
 set (9) 45:7 50:13,14
 92:20,24,24 102:1 124:12
 164:7
 settle (1) 3:1
 settled (2) 5:4 140:21
 settlement (4) 1:22
 2:1,18,25
 seven (2) 27:16 29:6
 seveneight (1) 27:5
 several (2) 74:13 132:25
 severely (2) 145:19 163:18
 shall (1) 116:11
 share (1) 4:12
 shares (1) 72:4
 sharp (1) 125:1
 shed (1) 48:6
 shellfish (2) 152:11 154:11
 shes (32) 3:19 19:13
 22:11,12,14,18,19 23:5
 24:7,9 29:11 30:25 31:23
 32:1,2 46:16,21,21,25 48:5
 49:15 55:13 64:17 65:6
 84:13 106:8 108:5 120:12
 145:10 150:12 165:1,2
 ship (4) 11:22 12:16,23
 148:8
 shipment (1) 10:21
 shipments (4) 13:1,25
 14:9,14
 shipped (3) 12:4 13:17 14:1
 shipping (1) 87:16
 ship (7) 13:10 51:2 85:5
 90:4 104:14 112:19 157:21
 shortage (1) 142:18
 shortages (1) 101:9
 shortcoming (1) 85:20
 shortcomings (1) 86:21
 shortfall (7) 13:5,10,24
 42:5,11 85:12 87:1
 shot (1) 2:12
 should (35) 10:5 17:7,8,15
 20:8 24:11,15 25:6 31:3,21
 32:11 36:14 48:25 58:12
 68:3 80:17,18 113:13,18
 115:17 117:4,4,6 118:24
 125:19 127:15 132:4 137:1
 147:24 151:19 155:9
 156:19,22 157:2 161:1
 shouldnt (6) 68:6 70:11
 91:11 160:14,15,15
 shout (5) 61:19 69:21 70:8
 73:12 95:6
 shouted (10) 60:20,21,23
 61:1,2,14,17 62:16 72:23
 73:16
 shouting (5) 51:9,15,16 62:3
 70:5
 shouts (1) 62:2
 show (8) 15:18 25:22
 38:13,14 78:9 97:11
 148:13 161:25
 shown (5) 41:16 42:2 59:25
 97:3 118:12
 shows (1) 40:17
 shut (8) 13:15 85:22,24
 87:15 143:1,8,24 144:10
 sic (1) 109:13
 sickened (1) 141:1
 side (3) 41:21 95:4 96:15
 signal (1) 48:25
 signature (2) 10:11 113:21
 signed (1) 119:17
 significant (5) 4:25 27:25
 33:8 34:7 94:20
 signing (1) 158:25
 silico (1) 128:14

similar (3) 4:13,16 144:13
 simple (6) 5:22 8:11 21:9
 133:24 145:16 163:16
 since (8) 7:3 13:11 89:19
 90:13,15 106:1 131:8
 152:23
 sincerity (1) 41:7
 single (14) 6:19 75:17,19
 76:7 77:1,4 80:2 142:13
 152:3,11 154:8,8,21 156:9
 sit (9) 8:24 23:13 28:10 32:9
 33:1 67:8 111:24 138:18
 162:9
 siting (86) 6:3 19:22,22 25:16
 26:3,4,23,24
 34:10,11,12,16,20,20
 35:5,12,13,24 36:5,8,24
 37:7,20,21,22,25
 38:3,4,5,8,9,11,16
 53:22,23 58:25 59:1
 60:5,5,16,17 61:11,19
 62:19 63:14 73:8
 74:3,12,14 75:9
 76:15,19,23,24 78:19 79:7
 81:15,18 83:19 89:21
 90:22 91:23 93:21,23,23
 96:16,17
 101:5,8,17,19,21,22,24
 102:2,8 103:6,20
 105:16,16 106:9,9,16
 107:1,6,8
 sitting (1) 108:6
 situation (8) 56:8 58:25
 82:18 90:25 94:8 101:6
 108:25 109:6
 six (2) 32:3 33:15
 size (2) 25:18 27:24
 sketch (1) 138:21
 skin (1) 154:2
 skirting (1) 136:4
 sleep (2) 139:2,3
 slide (1) 165:3
 slightly (3) 2:14 17:22 124:3
 slow (2) 57:15 160:9
 small (10) 39:11 71:18 77:23
 87:18,18 97:22,23 101:15
 111:11 120:8
 smaller (1) 35:6
 social (1) 37:20
 socialpleasure (1) 106:24
 society (4) 2:11 140:12
 160:21,23
 sold (1) 15:9
 solicitor (1) 49:12
 solicitors (5) 1:25 108:2,9,9
 112:10
 somebody (3) 3:23 92:14
 144:19
 someone (7) 36:17 39:21
 62:2 63:2 87:20 122:18
 164:9
 something (23) 1:20 7:3,13
 22:19 24:5,7 26:16 31:2
 66:24 69:23 76:8 77:4 83:3
 87:24 97:15 106:7
 115:1,11 136:16 140:10
 153:10,20 158:8
 sometimes (8) 13:12 26:2
 42:20 44:15 62:15 63:14
 68:24 139:1
 somewhere (2) 12:13 164:9
 soon (1) 105:6
 sort (7) 57:2 137:17
 139:23,24 140:1 143:12
 159:12
 sorted (2) 94:23 158:13
 sorts (1) 128:7
 sound (1) 70:18
 sounds (1) 6:8
 source (2) 23:5 53:22
 space (1) 131:10
 spam (1) 1:19
 spasming (1) 139:6
 speak (8) 1:12
 16:9,10,12,14,22 23:11
 37:21

119:19,21
stay (3) 66:18 143:16 163:9
staying (1) 20:5
steps (3) 5:1 64:4 80:3
step (1) 75:5
stick (1) 33:13
still (26) 2:5,8 10:16 19:15
 33:12,13 73:16 78:10 80:2
 82:25 88:20 92:23,23
 93:6,8 95:1 105:12,18
 110:4 114:1 131:6 143:24
 150:5 155:3 157:12 164:23
stipulate (2) 117:3,7
stipulates (1) 117:4
stipulations (1) 118:4
stock (4) 4:23 6:11 72:3
 143:11
stole (1) 89:12
stop (6) 21:25 52:19 95:10
 102:4 150:16 162:7
stopped (10) 44:6,18
 101:19,20,21 102:7,20,22
 103:1 160:8
story (1) 81:16
straight (1) 115:21
straightforward (1) 152:18
strain (1) 164:2
strained (1) 13:12
straying (1) 67:9
street (1) 158:22
streets (1) 161:7
stress (1) 15:1
stresses (1) 2:9
stretch (1) 41:10
strike (1) 67:19
striking (1) 92:14
strong (2) 92:23 145:21
strongly (3) 66:4 134:6 160:3
struck (1) 150:22
structure (3) 18:24 47:16
 110:18
struggling (2) 65:24 144:18
studies (3) 137:18,18,21
study (5) 14:21 87:7 136:8
 137:24 139:11
stuff (2) 53:24,25
subject (3) 3:5 35:18 115:22
subjects (1) 155:7
submitted (1) 25:22
subsequent (1) 37:8
substance (1) 127:16
substances (1) 123:12
successfully (2) 65:14 156:23
succession (1) 33:19
suffer (1) 100:1
suffering (2) 139:2,4
suggest (4) 41:22 160:13,14
 161:21
suggesting (4) 34:5 129:23
 140:2 159:8
suggestion (1) 84:24
suggests (2) 3:5 12:2
suit (2) 124:17 141:22
sum (1) 157:25
summary (1) 51:7
summary (2) 81:10 103:19
summer (2) 89:15 103:21
supplied (2) 143:2 163:22
supplier (3) 11:17 163:21,22
suppliers (6) 44:2 75:20,24
 76:19,21 103:5
supplies (1) 42:20
supply (19) 11:15,19
 13:6,8,12 14:10 15:1
 42:3,4,18 44:7,22 45:21
 87:5 142:12 144:23
 153:18,20,23
supplying (2) 145:17 163:17
support (1) 98:16
supported (1) 98:22
suppose (2) 8:4 67:22
supposition (2) 111:9,19
sure (29) 7:1 8:14,15 19:2
 28:11 37:6 58:9 60:18
 65:17 82:1 91:19 93:24
 94:6 95:17 98:11 105:1,20

113:14 119:8 120:10 123:4
 125:14 127:13,13 136:12
 137:24 149:25 150:3 159:8
surely (1) 109:16
surface (1) 136:4
surplus (1) 164:10
surprised (1) 134:12
surprising (1) 114:17
surrounded (3) 1:17 75:7,10
susan (9) 5:15,25 7:12
suspect (4) 2:23 4:12 36:20
 163:10
suspicion (2) 39:8 134:9
swim (1) 156:20
sworn (2) 8:23 166:3
symbol (1) 128:5
system (1) 92:20
systems (1) 133:25

T

table (2) 143:21 144:3
taken (21) 25:25 28:21
 30:10 38:16 39:10 55:3,8
 79:3 82:12,16 83:10 84:3
 89:21 90:2 94:18 120:9
 128:19 133:19 139:16
 150:2 162:22
takes (6) 67:6 70:22
 132:25,25 146:11,11
taking (8) 63:13 68:18 80:9
 90:2 93:21 123:12 140:24
 143:10
talk (11) 18:14 19:1 52:5
 54:1 87:14 116:8 125:17
 142:16 144:14,15 146:15
talked (14) 24:7 42:4 60:12
 85:10 86:21 87:13,19
 88:17 89:8 118:15 127:20
 132:1 148:15 161:17
talking (8) 1:23 27:5,13
 38:8 83:9,13 89:10
 106:3,7,8,10,15 124:5
 126:24 128:9 132:2 138:4
 140:25 141:13,20 146:5
 147:1,3,4 151:17 154:11
 161:1 162:6
talk (1) 156:21
target (2) 64:14 81:5
targeted (3) 62:7,8,10
taxation (1) 134:1
technical (1) 153:3
techniques (4) 127:22 146:6
 147:21 161:17
technologies (1) 151:25
technology (2) 131:8 155:2
telling (9) 21:6,7,10 40:3
 69:7 78:22 79:1 81:22
 151:19
ten (2) 5:20 97:24
tended (1) 102:5
tends (1) 78:13
term (3) 99:18,21 153:3
terminal (7) 63:17 69:9,11
 71:1,1,4,4
terminally (1) 71:10
terms (7) 42:24 51:12,13
 109:15 145:16 162:17
 163:16
territory (1) 103:12
terrorism (1) 134:22
test (24) 23:20 125:3 126:23
 127:4,8 128:17 129:14
 130:4 137:10,14
 139:5,9,13 145:14
 146:24,25 147:4
 152:10,15,19,22,23 153:24
 156:20
tested (8) 19:24 21:21 23:17
 88:13 115:24 116:25
 124:11 154:21
testing (22) 24:25 25 89:2
 124:13,14,20,21
 125:7,10,22 126:5 138:8
 139:10,25 140:15,23

142:13 144:24 145:17
 146:1 157:18 163:17
tests (14) 87:11
 122:15,16,24 124:10
 126:1 19 137:3 138:1
 146:18 147:13 152:18
 154:6,18
text (1) 113:18
thalidomide (2) 125:2,10
thank (35) 1:11 5:7,10,16
 8:19 9:1,10 10:7 37:13
 48:19 49:5 50:11,24 57:22
 68:16 71:5 91:8 103:7
 109:8,9 112:5,6,17 113:1,6
 114:6 161:18,18
sworn (2) 8:23 166:3
symbol (1) 128:5
system (1) 92:20
systems (1) 133:25

T

table (2) 143:21 144:3
taken (21) 25:25 28:21
 30:10 38:16 39:10 55:3,8
 79:3 82:12,16 83:10 84:3
 89:21 90:2 94:18 120:9
 128:19 133:19 139:16
 150:2 162:22
takes (6) 67:6 70:22
 132:25,25 146:11,11
taking (8) 63:13 68:18 80:9
 90:2 93:21 123:12 140:24
 143:10
talk (11) 18:14 19:1 52:5
 54:1 87:14 116:8 125:17
 142:16 144:14,15 146:15
talked (14) 24:7 42:4 60:12
 85:10 86:21 87:13,19
 88:17 89:8 118:15 127:20
 132:1 148:15 161:17
talking (8) 1:23 27:5,13
 38:8 83:9,13 89:10
 106:3,7,8,10,15 124:5
 126:24 128:9 132:2 138:4
 140:25 141:13,20 146:5
 147:1,3,4 151:17 154:11
 161:1 162:6
talk (1) 156:21
target (2) 64:14 81:5
targeted (3) 62:7,8,10
taxation (1) 134:1
technical (1) 153:3
techniques (4) 127:22 146:6
 147:21 161:17
technologies (1) 151:25
technology (2) 131:8 155:2
telling (9) 21:6,7,10 40:3
 69:7 78:22 79:1 81:22
 151:19
ten (2) 5:20 97:24
tended (1) 102:5
tends (1) 78:13
term (3) 99:18,21 153:3
terminal (7) 63:17 69:9,11
 71:1,1,4,4
terminally (1) 71:10
terms (7) 42:24 51:12,13
 109:15 145:16 162:17
 163:16
territory (1) 103:12
terrorism (1) 134:22
test (24) 23:20 125:3 126:23
 127:4,8 128:17 129:14
 130:4 137:10,14
 139:5,9,13 145:14
 146:24,25 147:4
 152:10,15,19,22,23 153:24
 156:20
tested (8) 19:24 21:21 23:17
 88:13 115:24 116:25
 124:11 154:21
testing (22) 24:25 25 89:2
 124:13,14,20,21
 125:7,10,22 126:5 138:8
 139:10,25 140:15,23

103:1,5 104:14 105:25
 139:6,7 143:7
thick (1) 146:6
thing (12) 39:19 73:12 90:4
 95:20 96:21 126:22 137:6
 140:8 141:5 151:4,7
 158:14
thinking (2) 4:3 163:20
thinks (1) 153:5
third (6) 17:10,19 18:21
 19:10,11,13
thorough (1) 155:10
though (5) 37:25 38:24
 86:14 93:11 120:10
thought (3) 5:4 58:3 99:16
thoughts (2) 49:4 53:2
thousands (4) 26:2 27:10
 31:13 155:18
threatened (1) 95:15
three (17) 13:2 64:6 83:11
 84:15 123:15,17 132:1,2,4
 141:14,15 148:16,20,20
 149:16 150:13 162:5
through (20) 3:8 9:20,22
 12:1 27:3,25 39:11 49:24
 67:10 101:6 102:25
 109:17,21 113:17 125:24
 126:2 129:6 139:1 147:16
 152:11
throughout (5) 59:4 66:3
 71:19 83:7 137:3
thrown (2) 92:4,6
thrust (1) 120:3
thursday (1) 1:1
tie (1) 82:2
time (36) 1:16 2:19 3:17 4:3
 7:25 12:19 31:17 34:24
 39:19 44:12 47:14 49:3
 56:8 57:2,7 65:20 66:15
 82:19 87:20 91:3 92:8,24
 96:8 101:15 104:14 105:1
 111:10 112:15 124:7 125:6
 131:2,3 132:22 142:3
 143:4 160:24
times (7) 38:4,5 60:4 61:12
 74:13,13 93:1
tin (1) 156:1
title (1) 18:7
today (13) 3:4,6 4:6 12:15
 17:1 30:11 37:21 42:2
 115:5 138:24 147:20
 161:16 164:17
together (2) 126:18 153:19
told (5) 32:13 36:6 53:25
 98:9 142:8
tolerance (1) 66:14
tomorrow (5) 13:20 160:8
 164:21,22 165:6
too (6) 67:9,15 78:12 82:14
 91:11 135:7
took (2) 26:2 49:23
touched (1) 163:25
towards (1) 159:3
toxic (2) 139:7,11
toxicity (19) 126:14 127:4
 128:24 137:10,14
 138:1,4,8,14,16 139:9,13
 152:18,19,21,22 153:5,9
 154:5
toxicologist (2) 127:13
 137:23
toxicology (8) 125:20,22
 137:18,21 138:25 139:5
 144:24 155:14
toxins (1) 152:12
trading (1) 18:8
traffic (1) 36:4
tragedy (1) 125:2
trained (1) 141:7
training (1) 107:9
transcriber (1) 29:9
transcript (2) 82:24 84:5
transfer (8) 11:23 14:8 76:19
 77:7 96:1 107:8 109:21
 110:7
transferred (1) 14:9

transferring (1) 77:21
transfers (1) 14:20
transgress (1) 66:2
transit (2) 157:16,17
transport (4) 77:15 79:3
 81:23 103:8
travel (9) 83:6 92:24
 101:8,15,16 105:9
 107:4,10 157:11
travelled (1) 101:13
travelling (9) 93:6,8
 104:19,22 106:1,13,16
 107:6 110:7
treat (3) 111:25 112:1,1
treated (1) 62:5
treaties (1) 119:18
trial (20) 1:17 4:4 10:6 31:11
 36:7 65:22 66:3,15 67:23
 82:9 84:6 111:23 112:25
 119:22 126:10,21 136:2
 138:24 147:19 155:19
trials (12) 23:19
 116:10,11,19 118:24
 123:13 127:15 137:4
 138:10,17 145:24,25
tries (2) 8:2 11:15
trolley (3) 78:21 83:25 84:2
trolleys (9) 78:9,17 79:3
 81:24 82:13 83:12,15
 95:14 96:9
trouble (1) 87:23
truck (2) 77:10 81:18
true (7) 10:16 78:18,18,22
 94:5 114:1 134:2
trust (1) 67:1
truth (1) 10:13
try (10) 33:10,24 39:2 42:17
 46:2 53:9 67:10 68:13
 97:14 140:18
trying (22) 6:20 16:6,8,21
 17:2 19:4,5 34:14 39:21
 135:19,21 136:18,24
 68:3,14 98:4 121:15
 138:18,22 160:1,16
turn (10) 9:15,17,20,22
 10:10 26:23 35:11,12
 76:21 113:17
turned (3) 30:19 35:5 143:9
turnover (2) 100:3,14
turns (1) 67:4
twentieth (1) 9:21
twominute (1) 27:14
type (8) 42:6,9 85:12
 86:21,22,24 87:2 135:18
types (1) 42:6
typical (2) 51:11,19

U

uk (53) 11:8,15 12:10,23
 13:4,9,17,22,23,24
 14:1,11,21,23,24,25,25
 15:1 42:3,13 45:7 46:24
 109:21,22,23 114:21,23
 115:23 116:4,16,16 117:17
 118:2,12 125:1 131:22
 142:20 144:5,25
 145:2,17,18 146:3,4
 147:1,4 149:23 150:17
 157:10,20 163:17,18 164:6
uks (1) 114:16
ultimately (6) 2:13 66:22
 67:4 68:8 81:19 124:7
unanimous (1) 102:1
unchallenged (1) 136:22
undercover (1) 38:14
underestimate (1) 47:18
undergoing (1) 137:2
undermining (1) 32:7
understand (36) 7:6 18:25
 19:8,20 20:9 32:18,20
 35:20 36:10,21 41:4 46:11
 47:20 59:19 63:1,4,5,21
 64:11,12 65:25 66:21
 67:2,20 70:16 73:14
 80:23,25 81:1 96:7 98:1

100:6 104:7 114:20 156:8
 157:6
understanding (17) 20:8
 56:8 63:2 73:10 76:12
 88:10 113:11 114:11,13
 115:22 116:4 123:18 129:9
 142:25 143:16 144:20
 156:6
understands (1) 64:14
unexpected (1) 139:11
unfair (1) 141:5
unfamiliar (1) 8:3
unfortunate (1) 145:9
unintelligent (1) 67:20
unintended (2) 68:20,22
unit (3) 133:8,19 134:5
units (1) 99:7
united (1) 19:17 142:17,18,20
united (4) 19:6
universal (6) 9:8 16:20 17:25
 18:9,10 19:10
universals (1) 18:12
universities (2) 114:22 152:1
university (1) 152:20
unknown (4) 9:12,16 10:5
 112:25
unless (3) 65:1 66:11,24
unmasked (1) 95:11
unpleasant (1) 73:11
until (4) 30:18 31:1 66:16
 165:8
updated (1) 121:10
upon (4) 6:24 41:9 48:17
 55:5
upset (1) 3:19
usage (1) 92:14
used (58) 25:6,7 45:12 83:1
 91:4 107:3 114:21
 118:4,6,11,22
 123:11,15,16,17,20
 124:1,4 125:3,4,21,22
 127:1,3 128:22 129:3
 135:19,21 136:18,24
 68:3,14 98:4 121:15
 138:18,22 160:1,16
 153:24 154:3,16,19
 155:17,22
 156:6,8,19,20,22,22,24
 157:2,20,22 161:7
useful (1) 56:19
uses (1) 155:22
using (13) 39:10 81:16
 104:18 105:12,19
 118:13,15 123:23,25
 131:21 151:13 154:20
 160:5
usually (8) 30:7 61:25 117:7
 119:1 132:11,14,25 141:14
utter (1) 141:24

V

valid (1) 130:17
validated (5) 152:3,6,14,16
 154:2
value (2) 135:18 158:7
values (1) 135:17
van (13) 59:8 77:23
 78:7,11,17,21 79:10
 81:16,18,25 82:15 83:25
 84:2
vans (5) 78:7 79:4 93:21,23
 94:2
variety (1) 163:24
various (6) 48:16 49:16
 74:24 119:17 154:3,17
vast (1) 151:23
vehicle (4) 57:15 59:11,17
 61:24
vehicles (6) 58:17,19,20,23
 59:13,3
vent (1) 39:11
version (1) 9:13
versus (1) 164:1
vertebrate (2) 118:2,3
vested (6) 129:24
 130:5,19,25 151:18 161:15
via (2) 109:16 110:5

video (25) 39:12 49:14,25
 54:16 55:18,19,20,20,25
 56:10,14,18,19,21
 57:18,20,23 58:14
 59:21,23 62:12,18,21 96:9
 107:15
videos (8) 50:10 51:21
 55:5,21 56:7 59:25 60:1
 108:11
views (1) 148:3
vigilance (1) 44:13
violation (3) 85:25 86:2,6
violations (4) 86:3,4,11,15
violence (1) 159:3
vision (1) 131:1
visit (1) 38:4
visited (1) 38:5
visiting (2) 60:15,17
visits (1) 61:8
vital (1) 161:6
vitro (2) 128:13,14
vivisection (5) 63:7 71:19
 138:24 147:19 155:19
vivo (1) 128:13
voice (1) 9:2
volume (2) 9:15

went (7) 27:3,25 72:21
 103:12 104:24 142:9
 157:17
 werent (3) 49:23 54:22
 126:24
 weve (26) 4:3 13:2 29:3 31:1
 35:23 45:5 57:2 58:14,15
 63:13 84:4 87:5 107:12
 119:3 144:13 145:8 146:2
 147:21 148:5,6 150:25
 155:15 156:18 157:1
 161:16 164:25
 whatever (3) 128:15
 154:22,22
 whats (16) 10:4 18:7 22:8
 32:21 43:17 52:25 53:21
 57:11 65:4 74:11,16 80:8
 110:3 116:22 126:20 155:5
 wherefores (1) 35:16
 whichever (2) 8:25 113:4
 whilst (2) 24:9 61:14
 whoever (1) 144:15
 whole (8) 13:11 26:1 27:3
 37:1 83:7 86:8 95:7 153:13
 whose (1) 130:13
 whys (1) 35:16
 wide (1) 159:4
 widely (1) 99:25
 willingly (1) 3:2
 window (1) 75:25
 wire (1) 75:8
 wisdom (1) 136:2
 wish (2) 113:4 137:9
 wishes (1) 6:23
 withdrew (3) 64:8 112:14
 164:16
 witness (119) 4:14 5:14 6:13
 7:11,12,20 8:4,7,10,13,22
 9:11,13,21,23,24 10:14,20
 12:22 15:16,19 16:24
 17:5,8 19:1,17
 22:4,7,14,23,24 23:8,9
 24:4,9,9 26:5,13 27:10,11
 28:9,12,19,21,24
 29:2,2,5,19 30:10,17,21,24
 31:2,10 32:8,11,19,20
 33:2,23 36:25 38:13,14
 39:1 47:11 48:15 49:16
 50:13 53:1,2,6 54:18 57:1
 58:12 59:9,24 61:4 64:8,14
 65:11,14 68:5,10,15 87:14
 90:5 91:18,20 97:11
 98:8,11,19,20 99:3 106:5,7
 108:8,9 112:14,16,23
 113:15,24 114:1 115:19,20
 116:6 126:16 136:14
 138:22 139:13 143:18
 144:3 149:6,8 152:8
 164:16
 witnessed (1) 146:7
 witnesses (9) 3:6 4:6 30:8,12
 49:20 67:12 68:3 84:21
 107:25
 woefully (1) 24:2
 wondered (2) 97:16 107:15
 wont (5) 2:24 7:24 33:3
 67:17 70:24
 wording (4) 121:3
 122:8,14,22
 work (31) 1:16 9:7,8 15:8
 16:7,7,8,16 19:12 47:9
 52:9 73:1 76:1,3 79:7
 104:3 105:13 106:20,20,25
 107:4,11 114:12 115:2
 123:19 131:20,25 132:20
 150:5,10 158:6
 worked (4) 15:7 104:1,1
 161:3
 workers (1) 77:2
 working (8) 16:18 41:11
 75:1,2 101:17 102:20
 151:12 153:16
 works (6) 19:10 31:20 32:25
 63:3 64:16 122:18
 world (4) 43:7 116:13 146:21
 164:9

worldleading (1) 132:2
 worlds (1) 131:22
 worried (1) 77:14
 worry (6) 8:1 52:10 86:17
 120:1,3 165:2
 worrying (1) 76:2
 worse (3) 29:16 96:24 149:1
 worth (1) 27:8
 wouldnt (14) 13:6,19 14:19
 23:24 28:9 50:6 59:14
 108:24 109:1 115:18
 134:18 151:8 159:23
 163:23
 write (2) 88:11 159:9
 writing (1) 158:21
 written (2) 135:8 150:9
 wrong (9) 2:21 7:13 10:23
 74:16 124:9 130:8 140:23
 144:5,6
 wrongly (1) 156:24
 wrote (1) 138:5
 wyton (17) 19:21 36:5,8
 38:8,9,16 60:5 63:14 74:2
 75:9 91:22 101:8 103:20
 106:9,9 107:4,4

year (25) 14:12,13 37:8,8
 38:6,7 45:15 60:12
 82:10,11,15,18 83:7,8,12
 90:14 101:10 115:7
 123:22,23 137:25 138:15
 143:22,23 155:18
 yearlong (3) 137:10 138:1,10
 years (16) 15:9 27:5,8 32:3
 33:15 45:13,16 60:10
 61:10 71:23,24,24 125:24
 132:18 160:22 161:8
 yesterday (2) 39:1 131:1
 yet (8) 32:22 72:19 120:18
 148:10,11,12 152:4 154:9
 yorkshire (1) 16:1
 youd (2) 60:4 90:8
 youll (11) 4:8 8:25 9:20,22
 10:13 15:18 50:20 55:4
 112:23 120:7 136:1
 youre (95) 1:8 2:15 8:7,10
 11:4 16:25 25 20:14
 21:6,7,10,16,18 25:10 31:8
 32:7 37:16 38:1 40:3,3
 43:11 45:22 47:4,5
 52:6,7,25 53:3,3,4,10,17
 59:24,25 62:4,15 68:14
 69:7 70:19 75:3 76:22,23
 77:14 78:16,19,20,25 79:1
 80:4 81:22,25 82:3
 83:9,13,22 84:24 87:15,16
 88:20,22 92:15 97:10,12
 98:3 99:6 106:15,23
 110:17 113:5 114:9 115:18
 119:13 123:4 124:12
 126:4,10,14 127:23
 136:10,14 138:11,22
 139:8,14 140:2,14,25
 147:10,12 148:16 151:19
 155:21 159:8 161:9 163:9
 yours (1) 122:20
 yourself (4) 4:17 8:14 26:8
 62:13
 yourselves (1) 88:4
 youve (76) 5:2 8:4 13:18
 14:17 32:13,13,15 33:13
 36:22 39:4 45:22 46:23
 49:22 50:12,22 51:21
 53:1,5,8,19,24,25,25
 54:8,15,19 55:24,25 58:17
 60:3,12,13,20 61:2,3,10,11
 62:11,12,21 63:10,11
 72:13,14,14,19,20 75:8
 77:17 78:3,4,14 79:1,20
 85:10,16 87:19,21,24 90:3
 100:24 110:19 114:8
 118:15 123:18 125:23
 126:2,4 136:8,16 141:6
 142:24 144:19 153:13
 157:12 161:17

Z

zero (1) 66:13
 zip (2) 41:22,23
 zoos (1) 134:17

1

1 (1) 116:9
 100 (3) 78:3 160:22 161:8
 101 (1) 37:12
 1030 (3) 1:2 165:6,9
 1034 (1) 1:4
 104 (1) 85:4
 1055 (2) 91:13,15
 109 (1) 166:11
 1100 (1) 41:13
 113 (2) 166:13,15
 114 (1) 166:17
 1151 (1) 51:1
 1166 (2) 112:24 113:15
 1174 (1) 113:18
 1175 (1) 113:23
 1205 (1) 49:7
 1208 (1) 51:3
 1223 (1) 7:2
 1248 (1) 113:24
 128 (1) 13:25
 13 (1) 55:16
 131 (1) 12:3
 137 (2) 51:5 52:24
 138 (1) 53:18
 14 (1) 12:9
 140 (2) 115:1,11
 15 (2) 49:11 166:7
 1520 (1) 125:24
 16 (3) 129:12,12,12
 18 (1) 86:15
 1908 (1) 160:23
 1958 (1) 125:8
 1964 (7) 116:13 117:13
 119:13,14 124:22 131:5,8
 1975 (2) 116:15 117:14
 1983 (1) 117:15
 1986 (1) 118:1
 1989 (1) 117:15
 1996 (1) 117:15

2

2 (5) 9:15 10:5 17:6 85:3
 116:9
 20 (3) 111:10 131:16 132:18
 2000 (1) 42:15
 2004 (2) 116:10,19
 2009 (2) 26:20 35:10
 20092010 (1) 5:24
 201 (1) 85:6
 2012 (1) 30:4
 2013 (3) 6:4 25:17 29:25
 2015 (1) 45:14
 2021 (12) 6:2 25:15 29:24
 55:16 75:12 89:15,15 90:9
 92:20 103:21 108:25
 123:24
 2022 (5) 12:13,20 13:2,11
 105:6
 2023 (3) 1:1 13:25 165:9
 20th (2) 7:12 51:6
 21st (2) 131:18 146:23
 226 (2) 115:7,9
 24 (2) 121:24 135:9
 242 (1) 112:18
 252 (8) 52:2,3,14
 54:13,16,16 55:7,16
 255 (5) 52:1 54:16 59:7,10
 112:20
 27 (1) 1:1
 274 (1) 54:17
 28 (1) 165:9
 29 (1) 142:16
 291 (1) 142:21
 292 (1) 144:13
 294 (1) 55:20

3

30 (4) 91:19,20 138:15
 144:22
 3000 (1) 124:3
 30day (3) 137:18,18 138:3
 32 (1) 87:11
 321 (2) 73:22 74:1
 328 (1) 73:22
 333 (1) 73:22
 35 (4) 13:2 19:17 88:11
 114:22

4

4 (2) 13:2,2
 40 (1) 134:11
 400 (1) 93:7
 4000 (6) 86:8 123:22,25,25
 124:1 155:14
 408 (1) 165:7
 43 (3) 17:16 47:11,13
 445 (1) 9:17
 446 (1) 9:20
 485 (3) 52:18,19,21

5

5 (1) 102:18
 50s (1) 125:2
 530 (1) 93:12
 5c (2) 24:14 25:5

6

6 (3) 93:12 115:15 116:18
 608 (3) 9:22,23 10:11
 60s (1) 125:2
 65 (1) 37:13

7

7 (1) 30:4
 730800 (1) 93:7

8

8 (2) 119:20 166:3
 80 (3) 71:23,24,24
 80yearold (1) 154:14
 85 (3) 37:11,14,15
 86 (1) 37:16
 87 (3) 5:25 7:10 25:13

9

9 (2) 155:6 166:5
 91 (1) 166:9
 96 (1) 136:6
 960 (1) 9:24