

OPUS2

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

Day 5

May 2, 2023

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Phone: 020 4518 8448

Email: transcripts@opus2.com

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

Tuesday, 2 May 2023

1
 2 (10.30 am)
 3 MR JUSTICE NICKLIN: Yes, Ms Bolton.
 4 MS BOLTON: My Lord, good morning. My Lord, I don't know if
 5 your Lordship wishes to deal first of all with
 6 Ms Jaffray's emails to the court and to Mills & Reeves
 7 concerning wishing to settle.
 8 MR JUSTICE NICKLIN: No. Is she on the line?
 9 MS BOLTON: I don't think she is, my Lord.
 10 MR JUSTICE NICKLIN: I do not think she is.
 11 MS BOLTON: I don't think she is, my Lord.
 12 MR JUSTICE NICKLIN: Well, pursue it offline with her.
 13 Presumably she needs to execute the consent order if she
 14 wants to settle and then you can give it to me and I'll
 15 approve it in the usual way.
 16 MS BOLTON: My Lord.
 17 MR JUSTICE NICKLIN: I rather took it that that was her
 18 final word on the subject, from the email I read this
 19 morning.
 20 MS BOLTON: My Lord, that's my understanding. I wanted to
 21 raise it with the court because the court wanted to give
 22 her time last week.
 23 MR JUSTICE NICKLIN: Well, she's had plenty of time now.
 24 MR CURTIN: Ms Jaffray is available.
 25 MR JUSTICE NICKLIN: I dare say she is. Have you seen the

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1 email that she sent?
 2 MR CURTIN: I have, yes, and I'm aware she goes into --
 3 I was just talking to the counsel for M&R about her
 4 computer breaking and -- yes, but basically she's
 5 overwhelmed and --
 6 MR JUSTICE NICKLIN: Well, she's made a decision. She's
 7 capable of making her own decisions --
 8 MR CURTIN: I know. I support her.
 9 MR JUSTICE NICKLIN: -- and she's made her decision and it
 10 will be resolved on the basis of a consent order,
 11 I imagine, unless she changes her mind. But that's --
 12 it need not detain us any longer today. All right?
 13 Right. So now we have to do a bit of
 14 choreographing.
 15 MS BOLTON: We do.
 16 MR JUSTICE NICKLIN: I don't think -- there's only one
 17 member of the public in court at the moment. I'm sorry,
 18 sir, I'm going to have to ask you to leave for just
 19 about five minutes. It's just that I have to arrange
 20 something in private, but you'll be very welcome to
 21 return.
 22 (Hearing in private)
 23 MR JUSTICE NICKLIN: Mr Curtin, you'll remember this
 24 process -- the reason we're doing it like this is so
 25 that you have the opportunity -- you know who this

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1 witness is, I understand, don't you?
 2 MR CURTIN: Pardon?
 3 MR JUSTICE NICKLIN: You know who this witness is? You've
 4 been provided with the list of the names?
 5 MR CURTIN: Yes, I know them.
 6 MR JUSTICE NICKLIN: For the sake of the record, the witness
 7 has to give -- as it were, confirm the witness
 8 statement, and that will be done -- the witness will be
 9 sworn in the usual way, will confirm the witness
 10 statement. You will see the witness do that. Then the
 11 video feed will be cut and we will go back into having
 12 a public hearing, whether that makes any difference if
 13 that gentleman returns, but it's important that we do it
 14 that way. The key thing to remember is you mustn't use
 15 the witness' name during the open court proceedings; all
 16 right?
 17 MR CURTIN: I understand.
 18 I have some representations to make in terms of
 19 housekeeping about witness AF, but that's not the next
 20 witness, is it?
 21 MR JUSTICE NICKLIN: Okay. We'll do that at a convenient
 22 moment.
 23 MS BOLTON: It's the next witness after this witness.
 24 MR JUSTICE NICKLIN: That's fine. We'll have a little break
 25 and then we will deal with whatever Mr Curtin wants to

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1 raise. Right. We're in private now.
 2 MS BOLTON: My Lord, I'm going to call the witness, then,
 3 the "Production Manager", and the witness' evidence can
 4 be found at pages 1123 to 1164 in the bundle. That's
 5 the persons unknown bundle, my Lord. It's page 487 in
 6 Mr Curtin's bundle.
 7 MR JUSTICE NICKLIN: Right.
 8 Is the person on the screen? Right, there we are.
 9 Just so we're clear, where is this videolink linked to?
 10 MS BOLTON: My Lord, it's the solicitors' offices in
 11 Norwich.
 12 MR JUSTICE NICKLIN: Right. Okay. And there's a solicitor
 13 present?
 14 MS BOLTON: Yes.
 15 MR JUSTICE NICKLIN: Fine, and all the necessary bundles are
 16 there?
 17 MS BOLTON: Yes.
 18 MR JUSTICE NICKLIN: Right. Okay. Carry on.
 19 MS BOLTON: My Lord, do you require me to say the witness'
 20 name once she's been sworn in?
 21 MR JUSTICE NICKLIN: Yes, just for the sake of the record,
 22 yes.
 23 PRODUCTION MANAGER (sworn)
 24 Examination--in--chief by MS BOLTON
 25 Q. [Production Manager], good morning. Could you please

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1 give your name and your occupation, please?
 2 A. [Production Manager], Production Manager.
 3 Q. And where do you work?
 4 A. MBR Acres at Wyton.
 5 Q. There should be a bundle in front of you. Can you turn
 6 to page 1121, please?
 7 A. Yes.
 8 Q. If you turn to page 1123, you should see a document that
 9 says, "First witness statement of the Production
 10 Manager".
 11 A. That's correct.
 12 Q. Could you please turn through the document to page 1164,
 13 please?
 14 A. 64?
 15 Q. Sorry, 1163. Apologies.
 16 A. Yes, I'm there.
 17 Q. Is that your witness statement?
 18 A. It is, yes.
 19 Q. Is that witness statement still true to the best of your
 20 knowledge and belief?
 21 A. Yes.
 22 MR CURTIN: Excuse me, those witness statements don't relate
 23 to me because it's my witness. Could you make it clear
 24 to me -- you said statement 1164 or something, but that
 25 doesn't relate to my bundle. It's only -- could you

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1 make sure that I know --
 2 MS PRATT: It's 487 in yours.
 3 MR CURTIN: Oh, it's that statement. Thank you.
 4 MS BOLTON: Thank you very much. If you remain there, there
 5 may be some further questions. Could we cut the video?
 6 MR JUSTICE NICKLIN: Just pause for a moment, Mr Curtin.
 7 We'll cut the video stream now and then we will go back
 8 into public; all right?
 9 MR CURTIN: So it's blank, then, is it?
 10 MR JUSTICE NICKLIN: Correct.
 11 MR CURTIN: So I was going to ask if that screen could be
 12 put on, but if it's blank --
 13 MR JUSTICE NICKLIN: I was wondering what's happened to that
 14 screen but it won't actually matter for now because
 15 we're not going to use the video feed at all.
 16 MS BOLTON: My Lord, we only asked for the screen to be
 17 turned off whilst it was in private because it could be
 18 seen from outside. That's all.
 19 MR CURTIN: No problem.
 20 MR JUSTICE NICKLIN: All right.
 21 (Hearing in public)
 22 MR JUSTICE NICKLIN: Yes, Mr Curtin, carry on. You'll
 23 probably have to refer to the witness as "Production
 24 Manager" because you can't use a name, but I'm sure that
 25 no offence will be taken by that.

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1 MR CURTIN: Yes.
 2 Cross-examination by MR CURTIN
 3 Q. So you are the Production Manager?
 4 A. Yes, I am.
 5 Q. And you describe yourself as -- in paragraph 6, if I may
 6 take you to paragraph 6.
 7 A. Yes.
 8 Q. The first couple of words:
 9 "As a result of the nature of my role and seniority
 10 ..."
 11 Yes?
 12 A. That's correct.
 13 Q. So what sort of period of time are we talking about?
 14 Are we talking about years or tens of years?
 15 A. Tens of years.
 16 Q. Okay. Your employment predates -- your employment at
 17 the Wyton site predates the -- MBR Acres being the
 18 owners; you go back to previous owners, yes?
 19 A. Yes.
 20 Q. So of all the witnesses that I have to question, you
 21 would be one with perhaps the most extensive knowledge
 22 of the business and of the site?
 23 A. Perhaps, yes.
 24 Q. This company provides -- MBR, your current employer,
 25 they provide, as has been said in other statements,

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1 beagles for medical experiments?
 2 A. That's correct.
 3 Q. It's not just medical experiments, is it? It's beagles
 4 for experiments; isn't that correct?
 5 A. That's correct.
 6 Q. Are you aware of the procedure of when people order
 7 beagles from the company? Well, do you check out the
 8 clients or do you know if your company checks out what
 9 experiments are done or what is the procedure to make
 10 sure --
 11 MR JUSTICE NICKLIN: No, Mr Curtin.
 12 MR CURTIN: My line of questioning -- okay, I could explain
 13 why -- what I was ...
 14 MR JUSTICE NICKLIN: Go on then. Don't click your pen,
 15 please.
 16 MR CURTIN: I'm so sorry.
 17 I just want you to know that they'll sell dogs for
 18 experiments to anybody that -- I imagine with compliance
 19 under the legislation, that's all.
 20 MR JUSTICE NICKLIN: I'm not sure that's relevant.
 21 MR CURTIN: Can I -- I was going to make a joke but you're
 22 not allowed to joke. Can I make a joke?
 23 MR JUSTICE NICKLIN: In my long experience of court 13,
 24 jokes that sound funny elsewhere don't sound quite so
 25 funny in court 13.

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1 MR CURTIN: Okay, but it does go to a point. I do want to
 2 explore -- and it's your job, you've made this ruling
 3 and no matter what MBR do, and the most important thing
 4 is what the protest does. But every time you say "it's
 5 irrelevant", I want to say "an elephant?".
 6 But you, with your extensive knowledge, you know
 7 that the beagles go to medical and non-medical
 8 experiments? That's correct, is it?
 9 A. I understand that, yes.
 10 Q. I would like to give an example of non-medical
 11 experiments, if I may ask, if I may address you first.
 12 MR JUSTICE NICKLIN: You can tell me about this in your own
 13 evidence.
 14 MR CURTIN: Okay, but I want to ask a question such as
 15 Porton Down, a military defence establishment, is this
 16 witness aware that, with her knowledge, dogs have been
 17 sent from site to Porton Down? Is she aware?
 18 MR JUSTICE NICKLIN: It's not relevant, Mr Curtin.
 19 MR CURTIN: Okay, one question.
 20 MR JUSTICE NICKLIN: Yes, it doesn't matter because the
 21 answer isn't going to be relevant so we don't ask the
 22 question; all right? You need to focus on -- you've
 23 done a good job with the other witnesses so far on
 24 concentrating on the allegations that have been made
 25 against you and also the question of the impact of the

1 protest activities on the individual witnesses. Those
 2 are the relevant areas. Those are the areas that you
 3 really need to focus on. If you've got other areas that
 4 you would like to explore, you can tell me about them
 5 and I can tell you whether they're relevant and, if they
 6 are relevant, I will let you ask some questions, but, if
 7 not, those are going to be the ground rules that will
 8 apply to every witness that we have during the trial.
 9 MR CURTIN: I just felt that, as this person had such
 10 seniority, it was just a chance to ask the one question,
 11 it's not just medical. I've asked that question, I'm
 12 going to now move on.
 13 MR JUSTICE NICKLIN: Okay.
 14 MR CURTIN: Let me stay in paragraph 6:
 15 "... I understand from the Claimants' solicitors
 16 that the Court is by now aware that the police are often
 17 required to assist when vehicles transporting animals
 18 leave the Wyton Site, and that without that assistance,
 19 the protestors will often block the road and obstruct
 20 the animal transport vans."
 21 Yes?
 22 A. That was correct, yes.
 23 Q. From your experience of the protests since Camp Beagle,
 24 prior to the injunction, do you remember seeing police
 25 frequently at the Wyton site? Let's start with

1 "frequently".
 2 A. Yes, I did.
 3 Q. What about daily? Would you see them daily at the Wyton
 4 site?
 5 A. Yes.
 6 Q. So the police were doing their job -- the police had
 7 a job to do and the police were present; yes?
 8 A. Yes.
 9 Q. So what's your first sentence? What does it allude to,
 10 that if the police weren't there -- I just want to
 11 clarify. What do you mean by this sentence? You're
 12 saying that if the police weren't there, they would
 13 block the drive? But the police were there every day.
 14 I just want you to expand on that. What do you mean by
 15 this sentence?
 16 A. Sorry, I'm not sure which sentence you're referring to.
 17 Q. From after the semicolon -- the entire first sentence,
 18 please read it again and I'm asking you -- I'm drawing
 19 your attention to the last part of this sentence:
 20 "... and that without that assistance, the
 21 protestors will often block the road and obstruct the
 22 animal transport vans."
 23 It's more like, "If the police aren't there, they'll
 24 do this", but you've said the police were there on
 25 a daily basis, so what do you mean? I'm asking you to

1 expand on it.
 2 A. We needed the assistance of the police to be able to
 3 enter the site on most days during the time before the
 4 injunction was put into place.
 5 Q. Yes, the police were there, but they were there every
 6 day, weren't they, prior to the injunction?
 7 A. They were there every day, yes.
 8 Q. So you don't know what it would be like without the
 9 police and without an injunction, do you?
 10 A. I don't know 100% what it would be like, but I can
 11 imagine it would be -- what it would be like.
 12 Q. Well, "imagine" is different --
 13 MS BOLTON: Let her finish.
 14 MR CURTIN: Sorry, I interrupted. You said "I can imagine".
 15 MS BOLTON: Please finish your answer.
 16 A. There were days when we couldn't access the site, when
 17 I had to drive away from the site and reconvene at
 18 different points within the neighbourhood to -- and that
 19 was even with the police assistance.
 20 MR CURTIN: Okay. I don't know if it's the prosecution's
 21 job to stop me from questioning, but I was going to stop
 22 you there because you said you imagine, so this is based
 23 on your imagination -- first of all, your imagination of
 24 what would happen without the police. That's right, it
 25 would be your imagination, wouldn't it?

1 Is this working?
 2 MR JUSTICE NICKLIN: Yes, the witness is just thinking about
 3 her answer. It doesn't amplify. I think it's the one
 4 that's relaying the communication to the witness, yes,
 5 but the witness will let us know if she can't hear your
 6 questions.
 7 A. When there was police or when the police weren't present
 8 at certain times and even when the police was present,
 9 the protestors were very close to our vehicles. They
 10 were blocking our entrance and exit to the site. They
 11 were actually walking with crowds of protestors around
 12 our cars up the main highway, which then had an impact
 13 on the public members that were using the highway as
 14 well. So if the police were there in presence, it made
 15 it much easier to access and exit the site.
 16 Q. So the police were there and it would be much easier if
 17 the police were there. There would still be protestors,
 18 like you say. Even though the police were there, the
 19 police seemed to be -- would you say that the police
 20 seemed to be facilitating the protest and your free
 21 passage, whereas perhaps you gave precedence -- did you
 22 think that the police should be giving -- let me break
 23 that down. Forget what I just said. There's too much
 24 stuff there. I apologise.
 25 So I put it to you that the police indeed were there

1 and the reason they were there was not just to
 2 facilitate the free passage of the highway; it was to
 3 facilitate lawful protest.
 4 A. I think if the protest was lawful and peaceful, it
 5 wouldn't be the case that the police should be needed.
 6 Q. That's an interesting -- that's your opinion. What
 7 about if the police were there in case of incidents?
 8 A. An incident of what because if it was peaceful and
 9 lawful --
 10 Q. Unlawful activities. The police were there -- I put it
 11 to you that the police were there to facilitate lawful
 12 protest and to allow you to arrive -- to get into work
 13 and to get out of work, just to facilitate that, to
 14 facilitate both actions. Did you have -- well, did you
 15 have any concept at all that the police were there to
 16 facilitate peaceful protest? Is that something that
 17 ever occurred to you?
 18 A. No. I didn't think -- the police are not there now.
 19 The police are not required now because it's more
 20 peaceful and lawful because the injunction is in place.
 21 Q. And were you relieved to see police officers in
 22 attendance?
 23 A. Yes, I was.
 24 Q. Do you trust the police generally? Are you an
 25 anti-police person or do you have positive ideas about

1 the police?
 2 A. I've got positive ideas about the police and I trust
 3 them to look after my safety.
 4 Q. So prior to the injunction, each day, with the workers
 5 going in and out, police were indeed present; yes?
 6 We've established that.
 7 A. Yes.
 8 Q. And on occasions, very seldom occasions, I put to you --
 9 very seldom occasions -- in fact, have you ever
 10 witnessed an arrest at those gates? Have you ever
 11 witnessed an arrest taking place at the gates?
 12 A. Not in person. Only via video.
 13 Q. So how many times between the beginning of
 14 Camp Beagle -- and let's take it to the date of the
 15 injunction, which is November 2021 -- how many times
 16 would you have gone in and out of the gates?
 17 A. Pretty much every day.
 18 Q. Okay. Right. So during my time -- paragraph 7, please.
 19 I'm going to go through your statement is what I'm doing
 20 in order. So paragraph 7, please. If I may read it
 21 out:
 22 "During my time as an employee of the MBR, I have
 23 seen many protest campaigns, including some that took
 24 place at the Wyton Site itself, as the current
 25 'Camp Beagle' protest does. However, I have never

1 experienced a protest campaign that is as intense or
 2 prolonged as the campaign that is the subject of these
 3 proceedings."
 4 So, because you've been involved for so long,
 5 decades, indeed you have seen many demonstrations; yes?
 6 A. Is that a question?
 7 Q. Yes, it is. Have you seen -- well, I'm -- if the judge
 8 could help me out, I'm trying to agree that you've
 9 seen --
 10 MR JUSTICE NICKLIN: Mr Curtin is putting to you that, given
 11 your length of service, you will have seen a large
 12 number of demonstrations at the site.
 13 A. Yes, that's correct.
 14 MR CURTIN: And I'm not asking to draw your attention to any
 15 particular one of those protests, but I put it to you
 16 that these protests would have been, you know, people
 17 making noise, people blocking the gates for some period,
 18 people with banners, people making themselves known
 19 outside of your gates in a loud, passionate way, in the
 20 stereotypical idea of protestors; yes?
 21 A. Yes.
 22 Q. People of -- were you working at the Wyton site while --
 23 decades ago when people broke into the site and took
 24 beagles away? Were you working at the site then -- at
 25 night-time, night-time raids. Are you aware that

1 there's been -- in the past at this site there's been
 2 Animal Liberation Front activities , where beagles were
 3 taken away, liberated? Are you aware of that?
 4 A. Yes, I am aware.
 5 Q. So you've seen over the years people being loud, proud
 6 and you're aware that incidents have taken place where
 7 people even broke the law; yes?
 8 A. Yes.
 9 Q. Do you -- you're on oath. Do you think you have any
 10 knowledge of my involvement with past activities before
 11 this site, before Camp Beagle? Think about it. Are you
 12 aware of any involvement you believe I may have had at
 13 the Wyton site before Camp Beagle?
 14 A. I have some knowledge.
 15 Q. Could you tell the court about that knowledge, please?
 16 A. Yes, I can. If you put "John Curtin" into Google as an
 17 activist , it gives all of your previous history .
 18 Q. Well, it gives a Google version; correct?
 19 A. Correct.
 20 Q. And did you form a -- what do you remember from that
 21 search?
 22 A. I remember that you've been involved in animal activists
 23 for many years.
 24 Q. Anything specific?
 25 A. I believe there was a couple of occasions relating to

1 graveyards.
 2 Q. Graveyards. Expand, please.
 3 A. Whether that would prove to be correct, I don't know.
 4 Q. But something to do with -- you said a "graveyard".
 5 I've read from previous witnesses -- does this jog your
 6 memory? -- desecration of a grave in relation to an
 7 anti-vivisection protest. Would that be something that
 8 you may have read?
 9 A. That's correct.
 10 Q. Do you believe that to be true?
 11 A. I don't know. I've just read it on Google. Is it true?
 12 MR JUSTICE NICKLIN: You don't have to answer questions,
 13 Mr Curtin.
 14 A. Sorry.
 15 MR CURTIN: Do you think you're -- okay, let's take it
 16 further. From the information you have gathered,
 17 did you then take that -- have you ever -- and remember
 18 you're on oath -- have you ever discussed Mr John Curtin
 19 with work colleagues?
 20 A. Of course.
 21 Q. And remember other witnesses have given statements.
 22 You're under oath. Have you ever --
 23 MR JUSTICE NICKLIN: I didn't hear that answer now. What
 24 did you say, please?
 25 A. Sorry. Of course I have.

1 MR CURTIN: Could you tell the court about this, please?
 2 A. As you are a member of the Camp Beagle and you are at
 3 the gates pretty much every day, obviously we discuss
 4 with my colleagues the actions that have happened on
 5 gaining entry and exit to the site and people's names
 6 are mentioned.
 7 Q. Yes. I'm not suggesting as such that there's
 8 anything -- this is more -- it's obvious human nature.
 9 There's nothing that surprising. It wasn't a trick
 10 question, "Have you ever discussed Mr Curtin?". I'm not
 11 surprised at all by your answer. Sorry, that's not
 12 a question. I was just telling you why.
 13 Now, you say you've Google-searched. I've asked
 14 this to other witnesses. Are you aware of a site called
 15 "Connie Jurtin", which is a -- I would describe it as
 16 a trolling site. There's lots of information on there
 17 about me and it appears to come from other animal rights
 18 activists. Are you aware of that, Connie Jurtin?
 19 A. No, I am not aware.
 20 Q. Okay. Have you heard rumours that Mr Curtin -- for such
 21 things -- let me give you a small list. Have you ever
 22 had conversations at work, in the canteen, about
 23 Mr Curtin, people saying he's involved in -- he's
 24 a bully or a thief or has stolen money and has actually
 25 been involved in sex crimes, sex predation? Have you

1 ever heard anything remotely like that at work? Think
 2 about it.
 3 A. No. As I said, we discuss the activities out at the
 4 gate on a daily basis with my colleagues, but, no, to be
 5 honest, I have better things to discuss.
 6 Q. Okay. Forgive me for the odd pause. I'm just reading
 7 my notes.
 8 Paragraph 9, please.
 9 MR JUSTICE NICKLIN: Top of page 5.
 10 MR CURTIN: "On some exceptional occasions, there were even
 11 upwards of around 100 protestors outside the Gate to the
 12 Wyton Site, and the staff would be unable to leave the
 13 Wyton Site at all."
 14 Yes?
 15 A. Yes.
 16 Q. I just want to take up your site -- you weren't able to
 17 leave the site at all. Could I rephrase that, that you
 18 would -- because there has never been a time when you
 19 haven't been able to leave the site. You've always left
 20 the site. Even if it was a matter of an hour or two
 21 hours' delay, you've never actually been prevented from
 22 leaving the site, prevented from --
 23 A. Yes, that's correct.
 24 Q. "The obstructions around the Gate to the Wyton Site were
 25 also ... very frustrating ..."

1 Yes?
 2 A. Yes.
 3 Q. You go on:
 4 " ... it was frustrating because we could not come
 5 and go as we pleased ..."
 6 Yes?
 7 A. Yes, we had to wait for police assistance.
 8 Q. And therefore -- but I'm talking generally now. I'm
 9 talking about the general obstructions. Is that -- this
 10 paragraph 9, when you say, "The obstructions around
 11 the Gate to the Wyton Site were also ... very
 12 frustrating ...", does that refer to only the occasions
 13 where you were blocked in for very, very long periods,
 14 perhaps an hour, two hours, or is this generally?
 15 "The obstructions around the Gate ... were also
 16 a very frustrating experience ..."
 17 What does that refer to?
 18 A. It was generally, in general, because during the period
 19 of time from the end of June 2021 and before the
 20 injunction was put into place, we could not access and
 21 exit the Wyton site without police presence.
 22 Q. Yes, and no one could -- I don't doubt at all for you
 23 that was frustrating, not being able to come and go,
 24 like you said, as you pleased. It was frustration; yes?
 25 That's why you've put it?

1 A. Yes.
 2 Q. Are you surprised that there are demonstrations? In all
 3 your years of working there, do you understand why there
 4 are demonstrations outside the gates? You may not agree
 5 with them, but do you understand?
 6 A. I understand everybody has a right to protest and agree
 7 or disagree with anything really in this world, but when
 8 it's a threat and intimidation, harassment, on a daily
 9 basis for now nearly two years, just somebody's life, it
 10 is -- I don't think it's acceptable.
 11 Q. But I'm not talking about the intentional harassing or
 12 distressing. I'm talking about protests at the minute,
 13 just the protests -- just the fact that there are
 14 protests.
 15 A. Everybody has a right to protest, as I say, as long as
 16 it's done peacefully and lawfully.
 17 Q. And would you say people standing outside the gates,
 18 even people that are holding the cars up for -- not for
 19 hours, not for hours. That would be ... but people
 20 holding your cars up as you go into work, showing you
 21 banners, that would still be frustrating, wouldn't it?
 22 They're demonstrating, you're going to work, there's
 23 a bit of a clash. I'm just confirming here that you're
 24 frustrated by it and I understand that. I just want you
 25 to confirm what you say in your statement, that it's

1 frustrating.
 2 A. Sorry, was there a question in that sentence?
 3 Q. There is a question -- well, I'm just getting you to
 4 confirm, as per this statement, that the fact there are
 5 demonstrators outside the gates, sometimes causing your
 6 vehicle to perhaps slow -- to perhaps slow down, that's
 7 frustrating, isn't it?
 8 A. It is frustrating, yes, which -- but it could be
 9 acceptable just to have to slow down. But when you have
 10 people standing all around your vehicle, in front of
 11 your vehicle, putting placards on the windscreen and at
 12 the sides of your vehicle, that is not acceptable.
 13 Q. Okay. Nowhere in your witness statement are you
 14 alleging such things against me. There's nowhere in
 15 your witness statement where you're saying I'm causing
 16 you -- I'm near your vehicle or -- is there?
 17 A. Is there not? I thought there was on page 25.
 18 Q. You're right. We'll come to that. Thank you.
 19 MR JUSTICE NICKLIN: Can I just ask a question about the
 20 witness' understanding? You've made the point several
 21 times now that there's nothing -- a peaceful protest.
 22 So that I understand your evidence, would you say that
 23 protestors who engage in shouting at the workers and
 24 abusing them -- for example, one of the regular things
 25 that is shouted is "Puppy killers" -- do you think that

1 that is not peaceful protest?
 2 A. I do, yes.
 3 MR JUSTICE NICKLIN: So that it becomes a not peaceful
 4 protest if -- does it matter what they shout or is it
 5 the fact that they're shouting?
 6 A. I think it's what they shout and what they call you
 7 every single day.
 8 MR JUSTICE NICKLIN: Okay.
 9 MR CURTIN: So it depends on what protestors do? Protesting
 10 itself you would not find terrifying or alarming?
 11 A. No.
 12 Q. But as long as they don't protest near you -- if people
 13 protest near you, which we'll move on to, this causes
 14 you some trouble. So you'd prefer that they were well
 15 away from you, these protestors?
 16 A. I would prefer they were well away from me, yes, and it
 17 has been much better since the injunction has been put
 18 into place.
 19 Q. The last sentence of paragraph 9, the last part of the
 20 sentence:
 21 "... and I did not know what the protestors were
 22 going to do, and the unknown is scary."
 23 MR JUSTICE NICKLIN: You'll need to ask a question,
 24 Mr Curtin.
 25 MR CURTIN: My question is you go -- you've been involved

1 with the Wyton site for decades; you've seen all manner
 2 of protests. You, above all people, should perhaps
 3 understand that protesting outside of the Wyton site is,
 4 let me say, a normal feature of the job.
 5 A. It's --- as I said before, everybody has a right to
 6 protest.
 7 MR JUSTICE NICKLIN: I think Mr Curtin's point is, given
 8 your experience and the long nature of your service and
 9 the fact that you have therefore been exposed to protest
 10 activities for many years --- I think Mr Curtin is
 11 suggesting that you're very familiar and well used to
 12 it.
 13 A. I wouldn't say I'm well used to it. Although I've
 14 worked on that site for many years, the protests have
 15 been very few and far between. We have experienced it
 16 but nothing as intense as this one has been.
 17 MR JUSTICE NICKLIN: Thank you.
 18 MR CURTIN: By "intense", one of the differences by
 19 intensity is the regularity, isn't it? That's a massive
 20 difference to anything that's happened before, the
 21 regularity? Would that be part of the intense feeling
 22 that you have?
 23 A. Of course, because nobody has been sleeping on the side
 24 of the road before for nearly two years.
 25 Q. Of course. I do believe there were other --- do you ever

1 remember people perhaps having --- and it doesn't really
 2 matter, but I'm just asking you --- previous camps that
 3 perhaps lasted over a weekend or a day? But, yes,
 4 there's been nothing on this scale, has there?
 5 A. No.
 6 Q. Do you remember any previous occasions when people may
 7 have stayed for the weekend?
 8 A. I can't remember anything personally, no.
 9 Q. Okay. So the daily protesting, that has been a feature
 10 in this frustration you feel, in this intensity; yes?
 11 A. Sorry, can you repeat that question?
 12 Q. It's the daily element of this protesting that has added
 13 to your feeling of the intensity and the frustration?
 14 It's the daily element that's a large factor here in
 15 your feelings; would that be correct?
 16 A. I wouldn't say ---
 17 Q. I'm not trying to catch you out.
 18 MS BOLTON: Please continue answering your question.
 19 A. Sorry. I wouldn't say it's the daily protest.
 20 I wouldn't say now with everybody being there daily with
 21 the injunction in place. It is prior to the injunction
 22 where it was intense.
 23 Q. Okay, but tell me about the every day factor. Go on.
 24 Just tell me what's the --- how has that affected you,
 25 the fact that there's daily protests? Surely it's more

1 intense to face daily protests than a few sporadic
 2 demos, perhaps three or four a year, that you may have
 3 been accustomed to in the past. I'm just trying to get
 4 from you an answer that --- I'm asking you if it's this
 5 daily protest that adds to your frustration --- is that
 6 correct? --- one of the elements.
 7 A. I still wouldn't say that it's --- the daily protest with
 8 the injunction in place as it is, it's not as
 9 frustrating as prior to the injunction. It's annoying
 10 that there are people there still shouting at you every
 11 day, but I wouldn't say it frustrates me as much as it
 12 did prior to the injunction.
 13 Q. So what have you seen at Camp Beagle that you'd never
 14 witnessed before throughout your entire time at that
 15 site for decades? What is it that you witnessed from
 16 the time when the camp was set up? You must have ---
 17 MR JUSTICE NICKLIN: Mr Curtin, that's fine. That question
 18 is fine. Just stop there and let the witness answer.
 19 A. Okay. So one time that I witnessed --- there must have
 20 been --- I don't know how many police were there when we
 21 were trying to leave site. I do believe there is video
 22 evidence of it somewhere. I don't know where. I was
 23 the first car to try to exit the site. The police were
 24 trying to hold the protestors back from pushing through.
 25 It was like they were linked arms and they were pushing

1 the protestors back. The protestors were trying to come
 2 underneath the policemen's legs. There were bottles
 3 flying from the back of the group of protestors over
 4 towards the police and towards our cars. We couldn't
 5 exit the site. The police told us to abort and go back
 6 into site because they didn't think it was safe for us
 7 to go out at that time, and that is what I call "very
 8 intense".
 9 Q. Yes. There have been previous other large
 10 demonstrations outside the Wyton site in the past.
 11 Would you accept that, that you just didn't see them?
 12 A. Nothing like that at all.
 13 Q. Do you know that for a fact ---
 14 A. Never in my life have I experienced a day that I did
 15 that day.
 16 Q. Okay. There's nothing in this witness statement ---
 17 MS BOLTON: It's in the witness statement.
 18 MR CURTIN: There's only one incident where you refer to me.
 19 That's on 13 September. Is this the day you're talking
 20 of now or is this another day?
 21 MR JUSTICE NICKLIN: No, I think it's likely to be
 22 evidence ---
 23 A. No.
 24 MR JUSTICE NICKLIN: I think it's likely to be evidence that
 25 the witness is giving more generally, not specifically

1 to you, so it may not be in your witness statement.
 2 MR CURTIN: Okay.
 3 MR JUSTICE NICKLIN: From my recollection, it will be
 4 the July --
 5 MS BOLTON: My Lord, I was going to say, for your note it's
 6 9 July, paragraph 24.
 7 MR JUSTICE NICKLIN: We all remember it, Mr Curtin. It
 8 featured prominently in the evidence at the injunction
 9 stage. It was the day where there were a very large
 10 number of protestors, it was a significant protest and
 11 the police struggled to maintain public order
 12 essentially .
 13 MR CURTIN: Yes.
 14 MR JUSTICE NICKLIN: I think it would be fair to say the
 15 police had initially lost control of the demonstration.
 16 What the witness is describing is consistent with that,
 17 which is the police told them to go back into the site.
 18 MR CURTIN: Yes. I was just trying to establish if you had
 19 previous awareness of large demonstrations at the site,
 20 but your answer is "not on this scale"; yes? Correct?
 21 A. That's correct.
 22 Q. You talk, like many of the witnesses -- and I don't
 23 really need to go into it with you too much -- about the
 24 idea of a convoy system being set up.
 25 A. Yes.

1 Q. Yes? In paragraph 10?
 2 A. Yes.
 3 Q. So this arrangement was made amongst the workers and the
 4 management and the police combined to facilitate your
 5 safe passage; is that correct?
 6 A. That's correct.
 7 Q. Paragraph 13, it talks about -- I think we've talked
 8 about it already -- times when you haven't been --
 9 really extensive long delays, rather than delays of
 10 perhaps -- having to slow your cars down with protestors
 11 in front -- the sort of daily kind of ritual, I could
 12 call it -- this refers to some specific days; yes? This
 13 happened three or four times and you say you can't
 14 remember exactly. So my question to you is paragraph 13
 15 refers to some specific sort of one-off events --
 16 yes? -- as opposed to -- if I can call it the normal
 17 frustration and the normal delay, there were --
 18 A. Yes.
 19 Q. Yes. So we'll come to a specific incident where I'm
 20 involved but it's not in your statement here that I was
 21 responsible for holding -- I, me, John Curtin, was
 22 responsible for those incidents. It's not your case,
 23 it's not your evidence that -- paragraph 13 -- this has
 24 happened three or four times. It's just -- it's a vague
 25 comment and it doesn't relate to me. Would that be

1 correct?
 2 A. That's correct.
 3 Q. Okay. Paragraph 14, you talk of hiding your identity .
 4 A. Yes.
 5 Q. So before Camp Beagle -- you've worked there for
 6 decades -- did you ever feel a need in the past to hide
 7 your identity?
 8 A. No.
 9 Q. But now you did because of the daily presence of people
 10 and -- we'll go on to why. But since the camp, there
 11 was now a need to hide your identity; yes?
 12 A. Yes.
 13 Q. Now, I can -- let me just ask this question here because
 14 you are a witness in the case against me. Is it your
 15 case that you had a personal fear of me, that I would
 16 target you, that I would identify you, or was it more of
 17 a generic fear of what may happen amongst the
 18 protestors? Is this specific to me, paragraph 14, this
 19 need to hide your identity?
 20 A. No, it's generic.
 21 Q. Okay. Can I put to you a very simple point, that
 22 I understand not wanting to be identified by protestors
 23 and then you have this fear of what the protestors --
 24 you've talked in your statement about what's happened to
 25 other workers who have been identified. I understand

1 that. But is there -- I'm asking you now, is there
 2 another reason why you would want to hide your identity?
 3 And that was -- is it the fact that you worked there at
 4 all, you want to hide the fact to your neighbours and
 5 anyone else that you speak to that you work for this
 6 place; would that be correct?
 7 A. No, that's not correct.
 8 Q. If I was to show you, say, a recent Daily Mirror
 9 headline, "The puppy factory", "The horrors of the puppy
 10 factory", and if -- I'm putting to you that the reason
 11 you would want to hide your identity is because you
 12 wouldn't want to be identified with such headlines.
 13 A. No, I don't read the newspaper.
 14 Q. Do you accept -- I could show it to you. Are you aware
 15 that in the past -- there has been an intensity in the
 16 amount of coverage, but would you accept that a number
 17 of times the company you work for has hit the papers,
 18 hit the headlines?
 19 A. I am aware that there has been articles in the
 20 newspapers. I haven't read them.
 21 Q. Okay. Could you accept this, that sometimes those
 22 headlines maybe relate to the amount of money the police
 23 has spent, sometimes the headlines will relate to what
 24 the protestors do, "Protestors block workers", and
 25 sometimes it will talk about the cruelty involved in the

1 work that you do at MBR, for example the Daily Mirror
 2 headline? So there's a whole variety of reasons why it
 3 appears in the headlines and sometimes it's unfavourable
 4 towards MBR. Would you accept that?
 5 A. I accept that.
 6 Q. Do you accept that there are people that hold very
 7 strong positions about the conditions and the background
 8 and the whole nature of animal experiments? Do you
 9 believe that there are people who hold very strong
 10 opinions on this, that are vehemently against what you
 11 do?
 12 A. Yes, I accept that.
 13 Q. Would you accept that this isn't just confined to what
 14 we would call "protestors"? You could say this is
 15 a widely held belief in society that animal experiments
 16 are cruel and that dog experiments particularly seem to
 17 get people's attention. Would you accept that out there
 18 in the public sphere there are many, many people that
 19 hold a similar position about animal experiments to what
 20 you call "protestors"?
 21 A. As I've said before, everybody has their right to their
 22 own opinion.
 23 Q. Okay. I just want to ... so I put to you --
 24 MR JUSTICE NICKLIN: Just a minute. On the specific point
 25 Mr Curtin was asking, he was suggesting to you that

1 there's a large body of people who are opposed to animal
 2 testing. Do you accept that or not?
 3 A. From the numbers involved in the protests and people's
 4 comments you see on Facebook, then, yes, I suppose I do.
 5 MR CURTIN: And I'd go back to my first question. I'm not
 6 discounting at all the fact that you'd want to hide your
 7 identity to prevent actions such as you describe and
 8 heard of had happened to the other workers, illegal
 9 activities where they'd been targeted in some way, but
 10 there's also -- I'm asking you to also say one of the
 11 reasons you didn't want to be -- you wore a mask was not
 12 to be identified as an MBR worker, which could mean then
 13 you'd just go to the supermarket, the shop, and someone
 14 might take issue -- not a classic protestor, but anybody
 15 who has, say, read the paper that day hypothetically
 16 where you appeared. That's a reason to hide your
 17 identity, just to hide the fact from everybody, the
 18 general public, that you work for MBR?
 19 A. Yes, I keep my identity hidden because of how much MBR
 20 has been highlighted in the news and in the press via
 21 Camp Beagle.
 22 Q. Okay.
 23 A. Prior to Camp Beagle, it was not necessary.
 24 Q. Right. Prior to Camp Beagle, we know that the site at
 25 MBR, under whatever name it went to, was the scene of

1 numerous demonstrations and actions; yes?
 2 A. I can recall some demonstrations but I wouldn't say
 3 "numerous".
 4 Q. It's not the first time that MBR has been in the news,
 5 is it?
 6 A. No, it has been in the news before.
 7 Q. So, prior to this, whilst these demonstrations --
 8 decades -- because you were involved -- when we say
 9 "decades" -- okay, sorry, forget what I just said.
 10 Were you involved in this company as way back as the
 11 1980s and the 1990s and the 2000s?
 12 MR JUSTICE NICKLIN: Mr Curtin, you mean the company that
 13 operated the site at the time?
 14 MR CURTIN: No, I mean this worker -- yes, with the --
 15 MR JUSTICE NICKLIN: Because 20 years ago MBR didn't --
 16 MR CURTIN: I apologise. You go back to this site. We
 17 talked about decades. Could you tell me when you
 18 started, just to establish that? How many years have
 19 you been employed on this site?
 20 A. I've been on this site for 40 years.
 21 Q. And I put it to you that in that time nothing along the
 22 lines of Camp Beagle with the regularity -- this
 23 company -- the nature of the business at this site has
 24 been the reason why there has been headlines and
 25 demonstrations in the past. Nothing along the lines of

1 what we have at Camp Beagle, but you've known
 2 controversy in the past; is this correct?
 3 A. That's correct.
 4 Q. And in that time have you been given security guidance
 5 in the past about protecting your identity because you
 6 work in this sensitive place? I want to ask you about
 7 that now. Have you been given security guidance in the
 8 past before the company was owned by MBR?
 9 A. Yes.
 10 Q. Could you tell us something about those security
 11 guidelines that you've been advised in the past to
 12 adhere to by simply the fact that you work at this very
 13 controversial place? Could you tell the court some of
 14 those security procedures, please, when you worked for
 15 Envigo or Harlan Interfauna or Interfauna whatever the
 16 name was in those 40 years?
 17 A. If you just give me a minute.
 18 Well, security procedures have always been in place,
 19 obviously, to look after your own well-being, to be
 20 observant, to take notice of what's going on around you
 21 and anything untoward, to report it in.
 22 Q. Okay. What about were you ever given advice before
 23 about your public identity of -- your public identity,
 24 you and your private information being out there in the
 25 public domain in any way, being associated with this

1 site? Let me scrap that question. Sorry. I do
 2 apologise. I'm not used to this. I'm literally
 3 learning on my feet.
 4 In the past, those security guidelines in the past,
 5 have you been ever advised in any capacity at all that
 6 it might not be the wisest thing in the world to tell
 7 the world that you work at MBR because there are people
 8 who will take issue with that? Do you understand my
 9 long-winded question?
 10 A. Yes.
 11 Q. And the answer?
 12 A. In the past, yes, I have been told to -- I've followed
 13 security guidelines.
 14 Q. Which were? Tell, please -- you're under oath and the
 15 idea is to give evidence. Tell the court of what those
 16 security guidelines were, say, 20 years ago.
 17 A. I've always been told to protect myself and look after
 18 my own well-being.
 19 Q. Have you been advised before -- for example, when it
 20 comes to 20 years ago, it was the beginning of social
 21 media, so once social media -- have you ever been
 22 advised, way before Camp Beagle, not to put on your
 23 social media that you work in this controversial
 24 industry at this controversial site? Have you ever been
 25 advised of that before?

1 A. I tend not to use social media for my personal life so
 2 I haven't actually ever been told not to put anything on
 3 social media, but I wouldn't anyway.
 4 Q. Okay. But do you have any memory of other people, other
 5 work colleagues -- have you any memory of security
 6 advice, because of the controversial of their nature, of
 7 not broad -- let me put it this way -- of not
 8 broadcasting to the world where you work? How about
 9 that for simplicity? Not to broadcast to the wider
 10 world where you work because that may lead to
 11 complications? Do you understand what I'm saying, the
 12 gist of what I'm saying?
 13 A. I understand what you're saying and, yes, I have --
 14 I know that people should not put things onto social
 15 media of their personal work.
 16 Q. And this is before Camp Beagle?
 17 A. I'm not sure that I -- yes.
 18 MS BOLTON: My Lord, I'm conscious of the need to give Opus
 19 a break. Is that a good moment?
 20 MR CURTIN: Yes.
 21 MR JUSTICE NICKLIN: Is that okay, Mr Curtin? All right
 22 then. We're going to take a break now, Production
 23 Manager. We'll come back at 11.55. I would suggest you
 24 just mute the link but leave it open so that we've got
 25 it available when we recommence.

1 A. Okay, thank you.
 2 MR JUSTICE NICKLIN: Please don't discuss your evidence with
 3 anybody else and also can I just clarify a point?
 4 I thought I could hear you or somebody at your end
 5 turning pages of documents.
 6 A. I only have my statement that I'm looking at.
 7 MR JUSTICE NICKLIN: Okay. While you're giving evidence,
 8 please, unless you're asked to look at your witness
 9 statement, please can you put it to one side. A witness
 10 in court who is being asked questions wouldn't be
 11 allowed to refer to their witness statement unless they
 12 either sought permission or were asked as part of the
 13 questioning process to look at their statement. So can
 14 I ask you, please, to put that to one side? If you need
 15 to refer to a document while you're giving your
 16 evidence, you will need to ask me, please, for
 17 permission to refer to it.
 18 A. Okay. Thank you.
 19 MR JUSTICE NICKLIN: All right. Thank you very much.
 20 (11.44 am)
 21 (A short break)
 22 (11.58 am)
 23 MR JUSTICE NICKLIN: Right, Mr Curtin. Is the link still
 24 active?
 25 A. Yes, I'm here.

1 MR JUSTICE NICKLIN: Good. Excellent. Thank you very much.
 2 MR CURTIN: I hope this won't take too long. Just some more
 3 questions. We need to go through the video you referred
 4 to that we talk about where I'm not present, but
 5 hopefully we cannot be here too long.
 6 Paragraph 15, I invite you to refer to the
 7 statement. In the middle of that paragraph:
 8 "The protestors seemed to really have it in for us
 9 ..."
 10 Yes?
 11 A. Yes.
 12 Q. Just prior to that:
 13 "... but they would say very little about MBR."
 14 I just want to draw your attention to that, this
 15 section; yes?
 16 MR JUSTICE NICKLIN: What's the question, Mr Curtin?
 17 A. Sorry.
 18 MR CURTIN: I beg your pardon. So there's one thing
 19 shouting slogans about the nature of your business, "MBR
 20 kill puppies", "Puppy killers", "You do monstrous things
 21 behind there", but you seem to take aversion to the fact
 22 when it becomes personal; is that correct?
 23 A. Yes.
 24 Q. Is there any evidence -- is it any part of your
 25 statement that I ever made things personal towards you?

1 A. There is one section, I believe it's on page 25, where
 2 you was shouting, pointing finger.
 3 Q. Ah, yes, calling you a puppy killer. That's correct,
 4 isn't it?
 5 A. That's correct.
 6 Q. We'll come to that in a moment because I will suggest to
 7 you that I called the person prior to you and the person
 8 after you also a puppy killer. When you hear "Puppy
 9 killer" -- when you hear me shout, "You're a puppy
 10 killer", do you take that personally? It's
 11 understandable if you do. Just a question.
 12 A. Not personally, no, because you shout it to everybody,
 13 as you said.
 14 Q. And how does it feel -- seeing as you refer to it --
 15 hopefully we can whizz through it on the video. How
 16 does it feel to be called a puppy killer?
 17 A. Well, it's not nice.
 18 Q. Are you a puppy killer?
 19 MR JUSTICE NICKLIN: Mr Curtin, we're travelling close to
 20 the line again now.
 21 A. Do I have to answer that?
 22 MR JUSTICE NICKLIN: Well, I'll try and rephrase the
 23 question. Do you accept that as part of your job -- or,
 24 sorry, is it part of your job to be involved in what
 25 we've learnt about, which is called "terminal bleeding"?

1 A. Yes, it is part of my job.
 2 MR JUSTICE NICKLIN: Right. So Mr Curtin's question is:
 3 do you accept, therefore, the criticism that you have
 4 been responsible for the killing of dogs or puppies?
 5 A. Under a project licence in a humane condition, yes.
 6 MR CURTIN: Could I ask the same question with regard to the
 7 transition period when --
 8 MR JUSTICE NICKLIN: No.
 9 MR CURTIN: I can't?
 10 MR JUSTICE NICKLIN: It's not relevant.
 11 MR CURTIN: Okay. So it may not be nice, but can you
 12 understand that there are people out there in the
 13 community -- bearing in mind that you've accepted that
 14 you've been under licence for killing puppies, do you
 15 accept that some people have a right to call you that,
 16 however unpleasant it is, however unpleasant it is?
 17 A. Sorry, is there a question there?
 18 Q. Yes.
 19 MR JUSTICE NICKLIN: The question was: do you accept that
 20 there may be people out there that, given the nature of
 21 the work that you do, feel that they should express
 22 their opposition to that by using words like "Puppy
 23 killer"?
 24 A. Yes, I understand that.
 25 MR CURTIN: Okay. Let's move on then.

1 So this feeling -- so would you accept now that
 2 this -- yes, in fact you say it in the statement.
 3 "The protestors seemed to really have it in for us
 4 ...".
 5 That "us", that anyone working for MBR -- is that
 6 what you mean by "us", the MBR employees?
 7 A. That's what I mean, yes.
 8 Q. Okay.
 9 "The protestors seemed to really have it in for us,
 10 and it therefore really concerned and worried me as to
 11 what the protestors might do ..."
 12 This is, of course, with your extensive knowledge of
 13 40 years. Your involvement goes back to a time -- can
 14 I first -- I beg your pardon. Can I remind you --
 15 because of your 40 years' involvement, are you aware of
 16 an organisation called "SHAC"? It was --
 17 A. Yes, I am.
 18 Q. Can I put it to you that was a very -- let's say,
 19 a militant organisation that had tactics like naming and
 20 shaming workers, targeting them at their homes, direct
 21 action, damaging the property by any means necessary --
 22 a very militant organisation. Are you aware of that?
 23 Do you have memories of that?
 24 A. I am aware of that, but homes are still being targeted.
 25 And where are SHAC now?

1 Q. But I'm talking about the SHAC campaign, which would
 2 have it on its front page. It was a deliberate
 3 concerted campaign to target workers. Do you remember
 4 that?
 5 A. I remember it, but what I'm saying is workers are still
 6 getting targeted at home.
 7 Q. Okay. Let's go to that then. You tell me you -- have
 8 you looked at Camp Beagle social media? There's
 9 a Facebook and an Instagram site. I do believe now
 10 there's a Twitter. Have you looked at those sites?
 11 MR JUSTICE NICKLIN: That's a fine question. Just leave it
 12 there.
 13 A. I have looked at Camp Beagle on Facebook. I don't use
 14 the others.
 15 MR CURTIN: Okay. Have you looked at them frequently?
 16 There's nothing wrong with looking frequently.
 17 Remember, I'm not trying to catch you out. Do you look
 18 at them frequently?
 19 A. Yes.
 20 Q. Have you ever seen on there, on those websites,
 21 something -- let's say a rogues gallery of workers,
 22 a "Let's get these workers"? Have you ever seen
 23 anything like that?
 24 A. I can't remember.
 25 Q. Have you ever seen your face and your details and

1 a story about you on Camp Beagle social media?
 2 A. No.
 3 Q. So you haven't been targeted by Camp Beagle on social
 4 media?
 5 A. I haven't been targeted.
 6 Q. You've said that homes have been attacked, but I'm
 7 talking about Camp Beagle. Are you aware of any
 8 individual actually being targeted on Camp Beagle social
 9 media or would you say it seems to be a generic attack
 10 on the company? Which one, individual attacks or could
 11 we say it's safer to say that Camp Beagle focuses on
 12 this generic attack?
 13 A. I think it's more a generic attack.
 14 Q. So when we go to your fear of what the protestors might
 15 do, it's not -- ah. You are aware that workers have
 16 been attacked in their houses but there's no suggestion
 17 that I have attacked you -- I've ever partaken in those
 18 attacks on anyone's houses; is that correct?
 19 A. I don't know who has attacked the houses. I have no
 20 idea.
 21 Q. Again, the last sentence of paragraph 15:
 22 "One of my friends who works in the industry but
 23 for a different company was targeted at home by
 24 protestors, so I was aware of the lengths some
 25 protestors can go to, and I was concerned that such

1 targeting could happen ..."
 2 I put to you, if you read that sentence, there's
 3 lots of "coulds" and "maybes". It's your speculation.
 4 And I'm not doubting that you can have the fears you
 5 have, but they're based on what might happen as opposed
 6 to what was happening -- would that be correct? -- in
 7 terms of militant actions?
 8 A. Yes, that's correct.
 9 Q. Did you ever -- have you -- in the whole time of
 10 Camp Beagle, have you personally -- and you've been
 11 going in and out the site, like you said, maybe five
 12 days a week, apart from holidays and stuff -- have you
 13 rang the police yourself about any personal attacks
 14 against you?
 15 A. No.
 16 Q. Okay. Why not? Can I put it to you that --
 17 A. Can I --
 18 Q. No, I haven't asked you a question. Can I put it to you
 19 that your fears of what might happen to you have not
 20 materialised, ever, otherwise you would have rung the
 21 police?
 22 A. That's correct.
 23 Q. Thank you. Right, we've just got to have a look at the
 24 video and I'm going to be as quick as I can. Can we go
 25 to the video of 95?

1 MR JUSTICE NICKLIN: Paragraph 95 or -- what are we looking
 2 at?
 3 MR CURTIN: If you could hold on, my Lord, it's
 4 paragraph 40, video 95, (inaudible).
 5 MR JUSTICE NICKLIN: Thank you. What you may find,
 6 Mr Curtin, is helpful -- and this is what barristers
 7 would do -- is you would ask the question of the
 8 witness, refer the witness to the evidence and then you
 9 can put to the witness what you say can be seen in the
 10 video. If the witness agrees with you, you don't need
 11 to look at the video.
 12 MR CURTIN: Okay. Okay, in that case -- good --
 13 paragraph 40, D11:
 14 "I understand from the Claimants' solicitors that
 15 D11 ... was also present holding a flag ..."
 16 MR JUSTICE NICKLIN: That's midway down the paragraph. It's
 17 just about four lines above the punch-hole.
 18 MR CURTIN: Which I would accept to you I --
 19 MR JUSTICE NICKLIN: Wait a minute. Let the witness find
 20 the relevant part.
 21 MR CURTIN: I beg your pardon.
 22 MR JUSTICE NICKLIN: Have you read that?
 23 A. Yes.
 24 MR CURTIN: I would put to you that if I were to show you
 25 the video now, indeed I was waving a flag, but why

1 did you feel a need to insert the fact that I was waving
 2 a flag into this statement, please?
 3 A. I don't know because it's irrelevant.
 4 Q. Were you guided in any way when you made this statement
 5 by the claimants' solicitors?
 6 A. No, I don't believe so.
 7 Q. But you don't remember the reason why you specify
 8 "John Curtin was waving a flag"?
 9 A. No, I don't know why I said that.
 10 Q. John Curtin waving a flag with --
 11 A. Probably because -- fine.
 12 Q. Okay, I'm prepared to leave it at that, "Mr Curtin waved
 13 a flag".
 14 Now, the next video I do need you to look at because
 15 I've looked at it -- video 268 -- and I need you to --
 16 the claimants' solicitors may help. I just need to know
 17 where I am on that video.
 18 MR JUSTICE NICKLIN: What paragraph are we looking at?
 19 MR CURTIN: I beg your pardon. Paragraph 48, video 268. So
 20 I'm not disputing that I am there. I am unable to
 21 identify myself.
 22 MR JUSTICE NICKLIN: How long is the video?
 23 MR CURTIN: I think just the mere identity because there's
 24 no evidence that I'm doing anything to cause alarm or
 25 harassment. I just want to know which one I am.

1 MR JUSTICE NICKLIN: Well, you want to ask the question of
 2 the witness, then: is it your evidence that Mr Curtin
 3 was doing anything wrong in this video and, if so, what?
 4 MR CURTIN: Did you hear the judge there?
 5 A. Yes, I did.
 6 Q. Do you remember why you made the statement,
 7 paragraph 48? It's understandable if you don't remember
 8 anything about it.
 9 A. I think that was the day that you were standing in front
 10 of my car.
 11 Q. I think that might be another day. We're going to come
 12 to one more video and there is some evidence of me with
 13 a loudhailer. There's nowhere in this statement --
 14 MS BOLTON: Sorry, what the witness has said is in line with
 15 her statement, so either she's challenged on that or --
 16 but she shouldn't be told, "No, that's not the date",
 17 because that's not fair.
 18 MR CURTIN: Ah, yes, yes. I beg your pardon. Well, then
 19 you need to take me -- I need to be shown that please.
 20 MR JUSTICE NICKLIN: Right. Let's watch the video then.
 21 Now, Production Manager, when we're watching this
 22 video, if you want to pause at any time, just say
 23 "Stop"; all right?
 24 A. Okay, thank you.
 25 MR CURTIN: If I may help your Lordship, from the previous

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1 statement, they've said I was identified via the
 2 claimants. I don't know if this witness is going to be
 3 able to ...
 4 MS BOLTON: Let her ...
 5 MR CURTIN: Okay.
 6 MR JUSTICE NICKLIN: All right. Let's watch it. Equally,
 7 Mr Curtin, if you want to stop it and point anything out
 8 to the witness, you can say "Stop" and then ask
 9 a question or whatever.
 10 (Video played)
 11 MR CURTIN: Ah, yes, and I've now seen myself.
 12 MR JUSTICE NICKLIN: Stop. Are you asking it to stop or
 13 not?
 14 MR CURTIN: Yes. I'd ask you to accept that the person in
 15 the bottom left-hand corner with the shiny bald head,
 16 with his maybe back to the other demonstrators, is me.
 17 MR JUSTICE NICKLIN: Okay. Now --
 18 MR CURTIN: But I want to go to the piece where --
 19 MR JUSTICE NICKLIN: Wait a minute. Let's do it in stages.
 20 Production Manager, first of all, do you understand who
 21 Mr Curtin is referring to there?
 22 A. Yes.
 23 MR JUSTICE NICKLIN: Mr Curtin is asking: do you accept that
 24 that's him?
 25 A. Yes.

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1 MR JUSTICE NICKLIN: Right.
 2 MR CURTIN: Can I advise -- just for the sake of timing, can
 3 we shift things forward, like we did, in incremental --
 4 for me that's a valid way of watching this.
 5 MR JUSTICE NICKLIN: Ms Bolton?
 6 MS BOLTON: To 53 seconds, please.
 7 MR JUSTICE NICKLIN: Okay. Let's just watch.
 8 MR CURTIN: It's 53 seconds?
 9 MR JUSTICE NICKLIN: We're watching.
 10 (Video played)
 11 MR CURTIN: Can we stop the video?
 12 Are you able to help the court with which is your
 13 car? Is the first car yours?
 14 A. The first car is mine, yes.
 15 Q. Thank you. Carry on.
 16 (Video played)
 17 Okay, stop there. Have you got anything to say
 18 about Mr Curtin standing in front of your car?
 19 A. No.
 20 Q. Is it your case that I did indeed stand in front of your
 21 car?
 22 A. Yes.
 23 Q. Okay. Let's go to the point -- take it back.
 24 MS BOLTON: 53 seconds.
 25 MR CURTIN: 53 seconds, thank you.

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1 (Video played)
 2 Yes, I've got that now. Mr Curtin, that's me, about
 3 six foot in front of your car. I was one of the people
 4 standing in front of the car -- not me alone, but one of
 5 the people, and certainly I'm standing there for a very
 6 brief moment though. Would you accept that it's
 7 a very -- could you paraphrase it? -- would it be
 8 acceptable, "Mr Curtin stood in front of my car for an
 9 extremely brief moment in time"?
 10 A. Okay.
 11 Q. Yes? Good. Last video. I think I did want to run you
 12 through it because the evidence against me is that
 13 I shouted, "Shame on you. You will have nightmares
 14 about what you have done today. No one loves a puppy
 15 killer".
 16 MR JUSTICE NICKLIN: Paragraph ...?
 17 MR CURTIN: Paragraph 50. That is indeed what you've said;
 18 yes? I would accept that you heard those words
 19 correctly. Did you take them personally against you
 20 or -- did you take them personally against you?
 21 A. You do take it personally, yes, when you're getting it
 22 shouted at you every single day of the week.
 23 Q. But when you hear it said to the worker in front of you
 24 and the worker behind you and you hear it every day of
 25 the week to every worker, it wouldn't be fair -- well,

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1 it would be strange and unreasonable to always think --
 2 every time you heard "Puppy killer", for it to be
 3 personal against you. That's not your case, is it?
 4 We've already talked about this.
 5 A. Have we talked about it?
 6 Q. The "Puppy killer" thing, that -- well, you indeed are
 7 someone who is responsible for puppy killers [sic], but
 8 even when that's said to you, do you accept that "Puppy
 9 killer " is something that every MBR worker hears
 10 directed against them? Would you accept that?
 11 A. Just give me a minute, please.
 12 Q. No problem.
 13 MS BOLTON: My Lady, it might help the witness to clarify
 14 whether it's that particular part of paragraph 50 that's
 15 still being challenged or whether we're back to the
 16 general question because I think we kind of -- there was
 17 a question about the particular matter in quotes and
 18 then we've gone back to the general question of puppy
 19 killers and I don't think that's -- I just wonder if
 20 that ought to be clarified. Which is Mr Curtin
 21 challenging? Is it what's in paragraph 50 --
 22 MR CURTIN: No.
 23 MS BOLTON: -- or is it generally again? That's what I'm
 24 ... because I think that's --
 25 MR JUSTICE NICKLIN: He's not challenging that it was said.

1 He's challenging -- based on the answers he's received
 2 previously, he's suggesting to the witness that -- well,
 3 he's asking whether she took those words personally.
 4 A. Yes, we do take it personally.
 5 MR CURTIN: Okay.
 6 A. Even though we hear it every day, it still affects you
 7 personally.
 8 Q. Then we go on to -- specifically you seem to point me
 9 out here:
 10 "I found D11 (John Curtin) pointing at me
 11 threatening, as I was scared that he might know who
 12 I was, and he was attacking me personally (even though
 13 I was wearing a balaclava and sunglasses as described
 14 above)."
 15 I put it to you, could you accept that Mr Curtin at
 16 that point had no idea that you had worked in this
 17 industry -- if I had, I may have said different -- there
 18 was no way on earth Mr Curtin could have known this much
 19 detail about you and in fact I ask you to accept that
 20 you were getting the same as everybody else, that --
 21 every other MBR employee. We can watch the video if you
 22 want because you'll hear the same things said to the
 23 cars in front and the cars behind.
 24 A. Sorry, I don't quite understand the question because --
 25 MR JUSTICE NICKLIN: The question is -- Mr Curtin is

1 suggesting two things. Firstly, he didn't know anything
 2 about you. He was making the same complaint or protest
 3 message to everybody that left the MBR Acres site. So
 4 in that respect everybody got the same treatment.
 5 A. Okay, yes, I understand.
 6 MR JUSTICE NICKLIN: Would you accept that?
 7 A. I would accept that.
 8 MR CURTIN: Okay. I feel no need to play the video then.
 9 Let's move on to your last section. You talk in
 10 paragraph 64 of your concerns about hitting people as
 11 you're driving and that causing you some uneasiness --
 12 in paragraph 64; yes?
 13 A. Yes.
 14 Q. I fully understand when there's a crowd of protestors
 15 and you have to make your way either past them or in
 16 some cases slowly through them. I just want to draw
 17 your attention to the last sentence of paragraph 64:
 18 "I start thinking they could rock my car for
 19 example."
 20 That's just -- okay. Let's talk about that last
 21 paragraph. Are you aware of any cars being rocked in
 22 that way, if I can call it, at the MBR protest since
 23 Camp Beagle? Are you aware of that incident -- anything
 24 like that taking place?
 25 A. No, I'm not aware.

1 Q. Okay. Paragraph 66, I just want to -- you refer to the
 2 demonstrations, once you've become accustomed to them,
 3 obviously, the first week, the first days, but by the
 4 time you made this statement, the Camp Beagle protests
 5 had become a normal everyday occurrence; yes?
 6 A. Yes.
 7 Q. So any initial -- well, you personally have experienced
 8 protests in the past, but you became very, very much
 9 used to this shouting, "Puppy killers"; yes? That's
 10 all. You became accustomed to it? It's not a trick
 11 question.
 12 A. Well, yes, because it's a normal everyday occurrence.
 13 Q. You talk in that paragraph of imagining people yelling
 14 at you:
 15 "I find I now imagine people yelling at me ..."
 16 So this noise of this demonstration has sort of
 17 begun to live with you a bit in the back of your mind;
 18 is that correct?
 19 A. Yes, because you can hear it all around the site.
 20 Q. But you've said:
 21 "... I now imagine people yelling at me, even when
 22 nobody is ..."
 23 It's like it's got into your head a bit. Nothing
 24 wrong with -- I'm not looking for any -- these
 25 demonstrations have got inside your head, haven't they,

1 the noise?
 2 A. It did.
 3 Q. Pardon?
 4 A. I said it did.
 5 Q. It did. Okay. Does it now?
 6 A. Not so much.
 7 Q. Why is that?
 8 A. Because the injunction is in place.
 9 Q. Okay. But there's still noise. It's still very, very
 10 noisy there. I was there yesterday. The noise
 11 continues, doesn't it?
 12 A. Yes.
 13 Q. Okay. You say you find the drums stressful?
 14 A. Yes.
 15 Q. There's no evidence that I play the drums, but could you
 16 just give me one simple sentence -- well, you've said it
 17 there -- could you explain to the court why you find
 18 drums stressful, please?
 19 A. Just a minute, please.
 20 I think it's just the sound that the drums make.
 21 Q. Okay. Paragraph 70, you talk of loving your job.
 22 A. Yes.
 23 Q. Could you -- what is it about the job that you love?
 24 MR JUSTICE NICKLIN: No.
 25 MR CURTIN: You've written it and you love your job. What

1 aspects of your job do you love?
 2 A. Working with the dogs.
 3 Q. Are you aware there are people in this country or people
 4 around the world that would find that incongruous --
 5 MR JUSTICE NICKLIN: Okay, that's a comment. I'm not going
 6 to stop you making the comment later in the case but
 7 it's not appropriate to put the comment to the witness;
 8 all right? That's just -- that's one of the rules of
 9 the trial process. You're perfectly entitled to make
 10 the comment that you want to, but in your speech later.
 11 MR CURTIN: Okay.
 12 MR JUSTICE NICKLIN: All right?
 13 MR CURTIN: Okay, I'll move on. Now, because I want to
 14 hurry up, I can point you to the page -- would it be --
 15 are we on the same page there?
 16 MR JUSTICE NICKLIN: Internal page numbers will be the same,
 17 I think.
 18 MR CURTIN: Page 39, paragraphs 75, 76, 77, 78, they talk of
 19 your anxiety, believing something may happen, believing
 20 that people may follow you to your house, believing that
 21 you may be attacked, anxious about all sorts of
 22 activities. I can understand why, but would you just
 23 accept with me that they are feelings of anxiety built
 24 on purely your fears and not on anything that's actually
 25 happened to you?

1 A. Yes, that's correct.
 2 Q. Is it the case you have never rung the police -- I asked
 3 you before had you ever rung the police about any
 4 attacks on you -- have you rung the police about any
 5 form of attacks on anybody else during the protests of
 6 Camp Beagle?
 7 A. Not in any form of an attack.
 8 Q. So could I put it this way, that you drive -- you see
 9 these protestors regularly, you have to drive through
 10 them. You're worried that one day your car, not only
 11 will it be surrounded by noise, but people will
 12 actually, you know, take it a bit further, physically
 13 assault you, smash a window. That's where those fears
 14 would end up, isn't it? That's the sort of situation
 15 which you really fear, where people would actually start
 16 breaking the windows, for example?
 17 A. Yes.
 18 Q. I'm coming to the very last section now. Page 40,
 19 paragraphs 81, 82, 83, 84 and 85. They are concerned
 20 with the effect of protestors on the efficiency of work
 21 at the Wyton site; yes?
 22 A. Sorry, I'm just going to read the question again.
 23 Q. Ah, I just want to refer you to the page. Page 40,
 24 I have it at paragraphs 81, 82, 83, 84 and 85, under the
 25 title "Effect of protestors on efficiency of work at the

1 Wyton Site".
 2 A. Yes.
 3 Q. So your role as production manager, MBR, they produce
 4 beagle puppies for laboratories and they produce
 5 beagles' blood; is that correct?
 6 A. The beagles produce the blood, yes.
 7 Q. Yes. As a result of the protests at Camp Beagle, has
 8 there ever been a day when the workers haven't been able
 9 to exit or -- enter or exit or go about their business?
 10 There have been some days where there was a delay of --
 11 you've talked about three or four incidents when there
 12 was an extensive delay, beyond an hour, but on the whole
 13 the protests -- the workers, like you, with some
 14 difficulty, went into the site and out of the site; is
 15 that correct?
 16 A. There were days when we didn't get into site until
 17 midday.
 18 Q. Yes. They're isolated, though, isn't it? You talked in
 19 your statement about three to four times that might have
 20 happened. I don't dispute it happened, but on the
 21 whole, throughout your time, these 22 months, you've
 22 driven in and you've driven out, with some protest
 23 activity at the gates, before the injunction; yes?
 24 A. Yes.
 25 Q. MBR has never been stopped from carrying out its

1 activities is basically where I'm heading, and you
 2 should know, you're the production manager. "Stopped"
 3 is the operative word here.
 4 Hello?
 5 A. Sorry, was that a question?
 6 Q. It was, yes. I put it to you that the work that --- when
 7 it comes to efficiency, the workers have come in and
 8 out --- with some delay, I accept, on three to four
 9 occasions which I'm not going to go into --- dog vans
 10 have driven in and driven out, sometimes obstructed, but
 11 I put it to you that the work of MBR has not been
 12 stopped by the protestors?
 13 A. It has not been stopped completely, no.
 14 Q. Has it been stopped --- has it radically been stopped?
 15 Has it radically been prevented? Why I say that, your
 16 job --- this company's job is to sell, for example ---
 17 forget about the blood --- to sell dogs to laboratories.
 18 Have those dogs gone out of the site?
 19 A. Yes.
 20 Q. Yes. So the production of beagles and the delivery of
 21 those beagles has continued for the 22 months; is that
 22 correct?
 23 A. Yes.
 24 Q. Paragraph 83, if I may put it to you, this is quite
 25 vague because --- you mention the drones, but:

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1 "Most staff members wear balaclavas when working
 2 outside ... as explained below when I talk about
 3 drones."
 4 A. Yes, that's correct.
 5 Q. But I don't think you do talk about drones --- I think
 6 that's your only mention of drone.
 7 MR JUSTICE NICKLIN: It's the same problem we had with
 8 another witness, which is there is a section of the
 9 witness statement that deals with drones --- it's
 10 paragraphs 86 to 90 --- but you don't have that in your
 11 bundle ---
 12 MR CURTIN: Okay.
 13 MR JUSTICE NICKLIN: --- so I wouldn't --- you don't need to
 14 ask any further questions on that.
 15 MR CURTIN: But it's production --- there will be --- there is
 16 some other evidence that I fly a drone. I'd just like
 17 to ask perhaps ---
 18 MR JUSTICE NICKLIN: You can ask them. If you want to,
 19 that's fine.
 20 MR CURTIN: So your evidence here, apart from what is
 21 against the evidence --- against me --- is that the flying
 22 of the drones at its height, it means that the workers
 23 make sure they wear their balaclavas so they're not
 24 identified; is that correct?
 25 A. That's correct.

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1 Q. Yes, I'm not being clear myself. So the drones --- apart
 2 from --- according to your statement, it includes a bit
 3 more effort of the workers of covering up their faces.
 4 It's not your case, as production manager, that the
 5 flying of drones has stopped work on the MBR site; is
 6 that correct?
 7 A. It hasn't stopped work on the MBR site but we've had to
 8 make exceptions and do tasks in a slightly different way
 9 to avoid being intimidated and watched by the drone.
 10 Q. Ah, watched is one thing, but why would a drone
 11 intimidate? Have you ever felt intimidated by a drone?
 12 A. Yes. When it's flying right next to your head, a few
 13 feet above you, and you know somebody is on the other
 14 end, watching every move you make, it's an invasion of
 15 your personal space.
 16 Q. Has that happened to you?
 17 A. Yes.
 18 Q. Did you report it to the authorities? Did you report it
 19 to the police?
 20 A. I reported it to security.
 21 Q. But not to the authorities? Okay. Let's move on.
 22 A. I followed procedures and reported it to security.
 23 Q. So you said before that it hasn't stopped you, but
 24 you've had to change some of your ways because of being
 25 watched?

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1 A. Yes.
 2 Q. And then a drone flying a few feet above your head
 3 caused you to be alarmed, frightened. I would be if
 4 there was a --- sorry, that's not a question. I haven't
 5 asked you a question. Right, I am ...
 6 A. Sorry, can I just say something?
 7 Q. No, I don't think you can.
 8 A. Oh, okay.
 9 MR JUSTICE NICKLIN: Ms Bolton will ask any further
 10 questions that she wants to ask.
 11 A. Okay, thank you.
 12 Q. Two more bits. Paragraph 84, the convoy has affected
 13 the efficiency; yes? That's what you've said?
 14 "Entering and exiting the Wyton Site in a convoy has
 15 had a real impact on efficiency at the Wyton Site."
 16 A. Yes, it would when we were not getting into work on
 17 time.
 18 Q. But wasn't it --- it's a choice, isn't it? I can
 19 understand why --- there's reasons why, but it's a choice
 20 you chose to drive in convoy. I gather it's between the
 21 police, management, workers. There was a choice to do
 22 the workers --- to go by convoy; yes?
 23 A. Yes, it was a choice for our safety.
 24 Q. You said there, 85:
 25 "The actions of the protests have also had

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1 a significant impact on staff, with many employees
 2 having left employment at MBR because of the distress
 3 they have been caused ...”
 4 Now, there's many, many reasons, I imagine, why
 5 people leave your particular place of work; yes?
 6 A. Yes.
 7 Q. Some people would find -- you've worked there for a long
 8 time. Some people might find it unbearable to work
 9 there, for example, the smell and the noise of those
 10 dogs. Some people would find that difficult; yes?
 11 A. That's each individual's choice.
 12 Q. Some people might find it difficult to take part in
 13 the -- we've talked about the terminal bleeding
 14 procedure. That might be a reason why someone might
 15 leave. And let me add to that --
 16 MR JUSTICE NICKLIN: Just get the -- that's a perfectly good
 17 question, but you need to get the answer; okay? So just
 18 to repeat it, some employees may have left because they
 19 didn't -- when they knew more about it -- didn't like
 20 the terminal bleeding process or being involved in it?
 21 A. If they were involved in it, then yes, that may have
 22 been a reason.
 23 MR CURTIN: And, for example, you do send puppies to
 24 laboratories where you must be -- you are aware that
 25 those puppies -- they end up in procedures that cause

1 pain and suffering, under licence; yes?
 2 A. I don't actually work in the laboratories so I do not
 3 know how (inaudible - overspeaking) to their procedures.
 4 Q. That's right, but you supply --
 5 MR JUSTICE NICKLIN: Mr Curtin, you want to rephrase the
 6 question in the line that you're following, which is --
 7 so the question is, to the production manager: once
 8 people became aware that the beagles were then sent for
 9 testing, some people may have decided to leave their
 10 jobs potentially because they disagreed with that?
 11 A. The people are made aware of where the dogs are going to
 12 at their interview stage, so they know where they go, so
 13 I don't believe that would be a reason for them to
 14 leave.
 15 MR CURTIN: Right. One more question and it's the
 16 chronology and it's on that other point. But what about
 17 people who go to work there who may be unaware before
 18 they go to work but then become aware -- ah, let me ask
 19 another question. In the 40 years of your work on this
 20 site, whoever owned it, have you ever become emotionally
 21 attached to one single dog? Considering the thousands
 22 and thousands of dogs that you might have come into
 23 contact with, have you ever had an emotional link with
 24 those dogs?
 25 MS BOLTON: My Lord, that's not relevant to this witness'

1 evidence.
 2 MR CURTIN: It's as to why people should leave.
 3 MR JUSTICE NICKLIN: Carry on.
 4 MR CURTIN: Have you ever?
 5 A. I have an emotional link with all the dogs.
 6 Q. I'm talking about a particular dog.
 7 MR JUSTICE NICKLIN: Right, a particular dog, not -- you've
 8 got an answer which is --
 9 MR CURTIN: All the dogs.
 10 MR JUSTICE NICKLIN: Yes.
 11 MR CURTIN: But never a particular dog? The reason I'm
 12 asking you this is that -- is to why people might leave,
 13 that it might be very challenging to work with dogs, to
 14 build up a relationship with them --
 15 MR JUSTICE NICKLIN: Well, no, Mr Curtin --
 16 MR CURTIN: -- and then send them off to labs. It's
 17 a simple point.
 18 MR JUSTICE NICKLIN: -- if that's the relevance of the
 19 question, the question needs to be put to the witness:
 20 are you aware, please, Production Manager, of any
 21 instance where an employee, as a result of forming an
 22 emotional attachment to one particular dog, decided to
 23 leave their employment?
 24 A. I am not aware of a case.
 25 MR JUSTICE NICKLIN: Right.

1 MR CURTIN: What about finding it extremely challenging?
 2 Are you're not aware in the 40 years -- it's my last
 3 question -- in those 40 years you have never come across
 4 a human being that found anything incongruous,
 5 unsettling and challenging about sending those dogs to
 6 a laboratory -- and perhaps a particular one, Daisy or
 7 Dolly, perhaps a dog that had been named, you'd never
 8 experienced that in the 40 years? Is that your case?
 9 A. I'm not saying I've never -- I personally have never
 10 experienced it.
 11 Q. But the judge asked you -- he wasn't talking about you
 12 personally. He'd asked you had you heard of it.
 13 A. I have heard, yes.
 14 MR CURTIN: Okay. Thank you. That's my last question.
 15 Thank you.
 16 MR JUSTICE NICKLIN: Can I just ask a general question then?
 17 In relation to what you understand to be employees'
 18 reasons for leaving, help me please with what reasons
 19 employees give for leaving the employment of MBR so far
 20 as you're aware.
 21 A. Moving to a different area, going -- progressing and
 22 going to work for the contract research companies.
 23 Sorry, I can't really think. I can't think. Just other
 24 employment.
 25 MR JUSTICE NICKLIN: All right. Thank you very much.

1 Ms Bolton?
 2 MS BOLTON: My Lord, no re-examination.
 3 MR JUSTICE NICKLIN: Right. Thank you very much.
 4 Thank you very much, Production Manager.
 5 I apologise I'm having to use that term but you'll
 6 understand why. That completes your evidence. Thank
 7 you for making yourself available to the court.
 8 A. Thank you.
 9 MR JUSTICE NICKLIN: Right. Who is next? AF?
 10 MS BOLTON: My Lord, yes. This was a witness that it was
 11 only Ms Jaffray who had indicated she wanted to
 12 cross-examine because there are no specific allegations
 13 against Mr Curtin.
 14 MR JUSTICE NICKLIN: Okay.
 15 MS BOLTON: If Mr Curtin is now to ask for her to be
 16 cross-examined, I just highlight we're already an hour
 17 behind on the timetable today.
 18 MR JUSTICE NICKLIN: Mr Curtin, you wanted to talk to me
 19 about issues relating to witness AF.
 20 MR CURTIN: AF, yes.
 21 MR JUSTICE NICKLIN: You said there was a housekeeping
 22 matter you wanted to raise this morning.
 23 MR CURTIN: If you can point me to where it is in my bundle.
 24 MS PRATT: Page 625.
 25 MR CURTIN: I have got -- when I'm asked to accommodate the

1 court, I do have that in mind.
 2 The witness is down here perhaps to give evidence.
 3 I did -- I've got a number of points I would like to
 4 make, very simple points, very generic, because I'm not
 5 actually mentioned in the statement. It was to do
 6 with -- basically, she is an employee, she feels
 7 terrified by the demonstrations, and some really
 8 simple -- a few simple questions that me, as
 9 a demonstrator --
 10 MR JUSTICE NICKLIN: That's fine.
 11 MS BOLTON: My Lord, I simply make the point, again, we
 12 weren't given notice that this witness was required, but
 13 if your Lordship wishes for her to be called, she'll be
 14 called.
 15 MR JUSTICE NICKLIN: Well, she was -- serendipitously,
 16 because Ms Jaffray had asked for her to give evidence,
 17 the witness is ready so it's not going to take long
 18 because there aren't any individual incidents, but it
 19 does seem to me that Mr Curtin is entitled to probe the
 20 general case in the way that he has done with other
 21 witnesses. I mean, you could say -- you could make the
 22 concession, which is the witness isn't saying that
 23 Mr Curtin is personally responsible for any of this
 24 and -- you may feel you can't go so far as to say that
 25 the protestors target the employees as a whole, not as

1 an individual. They don't single out individuals
 2 typically. But that's -- am I right, Mr Curtin, that's
 3 the broad thrust of what you want to put?
 4 MR CURTIN: Yes. It would be my broad thrust that it's the
 5 protests themselves that make this person nervous, not
 6 any allegations that I've done anything untoward.
 7 MS BOLTON: That's her evidence.
 8 MR JUSTICE NICKLIN: What is?
 9 MS BOLTON: It's not targeted at Mr Curtin.
 10 MR JUSTICE NICKLIN: No, I know that.
 11 MS BOLTON: But if Mr Curtin wants to ask her questions,
 12 then --
 13 MR JUSTICE NICKLIN: Right. It's quicker to get her ready
 14 and ask questions than it is to argue about whether we
 15 should do it.
 16 MS BOLTON: My Lord, indeed. My Lord, do you want me to do
 17 that before or after lunch?
 18 MR JUSTICE NICKLIN: Let's do it after lunch. Could we
 19 possibly start at 1.50? Is that all right? Okay.
 20 Is that okay with everybody else? Right, okay,
 21 we'll start at 1.50 then; all right? Thank you very
 22 much.
 23 (12.52 pm)
 24 (The short adjournment)
 25 (1.49 pm)

1 MR JUSTICE NICKLIN: Right, okay. Thank you very much.
 2 Carry on, Ms Bolton. We're ready for the next witness?
 3 MS BOLTON: We are indeed, my Lord.
 4 MR JUSTICE NICKLIN: Right. To the members of the public
 5 who are in court, I'm going to have to ask you to step
 6 outside for about five minutes because anonymity orders
 7 have been made. We have to go through the process of
 8 having the witness properly sworn and identified on the
 9 video, then we cut the video feed, then we restart. So
 10 it will be about five minutes. Sorry for the
 11 inconvenience.
 12 (Hearing in private)
 13 MR JUSTICE NICKLIN: Carry on, Ms Bolton.
 14 MS BOLTON: My Lord, in that case, I'll call the next
 15 witness which is in the witness statement bundle for the
 16 persons unknown, it's 1339. It's the witness statement
 17 of Employee AF whose name is [redacted].
 18 My Lord, apologies, the transcriber is not here.
 19 MR JUSTICE NICKLIN: Do they record it? We'll wait, but --
 20 MS BOLTON: Yes, apologies. (Pause)
 21 MR JUSTICE NICKLIN: You haven't missed much, we just
 22 realised you weren't here, but you'll need to check the
 23 tape for the little bit that we did before you got here.
 24 It's not very important.
 25 MS BOLTON: I can provide that, if needed, afterwards.

1 MR JUSTICE NICKLIN: Right. Restart that bit where you're
 2 just introducing.
 3 MS BOLTON: My Lord, I'm calling my next witness, which, in
 4 the witness statement bundle, persons unknown bundle, is
 5 at 1339, and that's the witness statement of
 6 Employee AF, who is [redacted].
 7 MR JUSTICE NICKLIN: Thank you very much. So we'll activate
 8 the screen, please.
 9 EMPLOYEE AF (affirmed)
 10 MR JUSTICE NICKLIN: Just to set some ground rules, please,
 11 while you're giving evidence. The first is, please,
 12 don't refer to any documents unless you're asked to do
 13 so and, if you want to look at your witness statement,
 14 for example, you must ask permission to do that, please.
 15 Ordinarily, if you were in court, that would be the
 16 rule, so it must apply when you're giving evidence
 17 remotely. Ordinarily I would be able to see whether
 18 a witness was looking at his or her witness statement
 19 during your evidence, but because we're cutting the
 20 camera, I can't do that, so I'm going to have to ask
 21 you, please, to abide by that rule even though I can't
 22 see you; all right?
 23 A. Yes, my Lord.
 24 MR JUSTICE NICKLIN: Right. Ms Bolton.
 25 Examination—in—chief by MS BOLTON

1 MS BOLTON: [Employee AF], good afternoon. If I could ask
 2 you, please, to turn to page 1339 in the bundle in front
 3 of you, you should have the first witness statement of
 4 Employee AF.
 5 A. Yes.
 6 Q. If you could turn to page —
 7 MR JUSTICE NICKLIN: You can cut the camera. Sorry, I've
 8 interrupted but there's a reason for it.
 9 MS BOLTON: If I could ask you, please, to turn to
 10 page 1355 —
 11 A. Yes.
 12 Q. — was it you that signed this witness statement off?
 13 A. It was.
 14 Q. Is that witness statement still true to the best of your
 15 knowledge and belief?
 16 A. Yes.
 17 MS BOLTON: Thank you very much. There may be some further
 18 questions for you.
 19 MR JUSTICE NICKLIN: Just pause for a moment, Mr Curtin,
 20 while we get the public back in. Thank you very much.
 21 (Hearing in public)
 22 MR JUSTICE NICKLIN: Right. Carry on, Mr Curtin.
 23 Cross—examination by MR CURTIN
 24 MR CURTIN: Good afternoon. I'm going to go through your
 25 statement chronologically so let's go to paragraph 6.

1 Before you started to work at the Wyton site, you talk
 2 about hearing — you heard about protests on the local
 3 news, either on television or on the Facebook groups for
 4 local newspapers; yes? Is that correct?
 5 A. Yes, it is.
 6 Q. If I can go to the end of that site:
 7 "There were also news reports of police being
 8 required to be present outside the Wyton Site to help
 9 manage the protestors due to how aggressive they were
 10 being."
 11 Yes?
 12 A. Yes.
 13 Q. So before taking the job, you were aware of the
 14 campaign, and by your two statements there, you knew
 15 there were issues to do with harassing and alarming and
 16 then the other one to how aggressive they'd been. I put
 17 it to you that's your personal spin on those accounts,
 18 that another person may see the same account and be
 19 delighted that there are protests, but you seem to home
 20 in on the fact that there had been trouble with
 21 protestors. Would that be correct?
 22 A. I'm not sure I understand your question.
 23 Q. I apologise — first of all — the judge may have to
 24 intervene. I apologise if I didn't make it clear.
 25 You've taken — you talk about your view before the camp

1 and your view from the media and Facebook groups. It's
 2 all about the alarm, the intimidation, the aggressive
 3 behaviour of the protestors. You do not highlight
 4 anywhere in there, any positive statement, the fact that
 5 the demonstrations are taking place in terms of, like,
 6 "Isn't it good that there are demonstrations?". You
 7 seem to already take a negative view of demonstrations;
 8 would that be correct?
 9 A. I was taking a negative view to this protest due to how
 10 the protestors were being portrayed.
 11 Q. You talked about — you've given an example of
 12 Will Young — Will Young — chaining himself to a gate.
 13 Could you explain the negative connotations of seeing
 14 that and turning that into a negative, please, in terms
 15 of aggression, bullying, intimidating? Could you
 16 explain that, please, why Will —
 17 A. Because —
 18 Q. Yes, go on. Carry on.
 19 A. Because it was affecting the business and the staff
 20 members negatively.
 21 Q. All right. Hopefully you're not going to be here too
 22 long because nowhere in this statement — is it
 23 correct? — do you mention my name?
 24 A. Once I mentioned your name, as in you were present at
 25 one of the events that happened.

1 Q. Would that be accepted?
 2 MS BOLTON: She doesn't accuse you of anything. She just
 3 mentions you.
 4 MR CURTIN: Right. I stand corrected. Paragraph 22, yes,
 5 just I'm at the protest. Paragraph 22:
 6 "... John Curtin [you give a description] who was
 7 wearing a black tank top ..."
 8 Just the fact I was at a demonstration; yes?
 9 A. Yes.
 10 Q. That's your entire involvement of me. Okay, I'll come
 11 to that chronologically. Right.
 12 You had some vague awareness about the injunction
 13 before you came to the job; is that correct? That's
 14 what you say in paragraph 7.
 15 A. I was aware that an injunction had been put in place but
 16 I didn't know the details of it.
 17 Q. And you had a presumption that, because there was an
 18 injunction in place, that would mean there would be no
 19 protestors; that was your --- you've put here in
 20 paragraph 7; is that correct? Is that your assumption?
 21 There was an injunction. That means, therefore, you
 22 presumed there would be no protest; is that fair, to sum
 23 you up?
 24 A. Yes, at that time that was my assumption.
 25 Q. Why did you think that? What led you to believe that,

1 because there was an injunction, that means it's going
 2 to ban the protesting?
 3 A. I didn't think that the protest had been ended. I just
 4 assumed that the protestors had been moved further away
 5 from the gate.
 6 Q. Okay. Good. In paragraph 8 you talk of having a trial
 7 run and you saw the protestors and that made you feel
 8 nervous.
 9 A. Yes, that's correct.
 10 Q. And then you were adding that to your view of what you'd
 11 seen on the news and you talk --- in your last few
 12 words --- your last couple of words in paragraph 8:
 13 "... [it] painted a picture of harassment and
 14 intimidation."
 15 So it made you nervous just to see protestors?
 16 A. Yes, that's correct.
 17 Q. That's your business. I'm not here to question whether
 18 you feel --- I'm not doubting the fact you felt nervous.
 19 What here I'm doing is to challenge the reasonableness
 20 that you could come to such a high amount of fear and
 21 nervousness about intimidation when nothing has happened
 22 to you so far. Would it be fair to say that you're
 23 basing this on your own stories about protestors at this
 24 point? You haven't even negotiated them yet and you've
 25 already got a fear of protestors outside the gates.

1 Would that be in any way correct?
 2 A. Yes, that would be fair. I had a nervousness around the
 3 protestors outside of the MBR Acres site, not all
 4 protestors ---
 5 Q. Okay.
 6 A. --- but due to what I had heard, I did have
 7 a nervousness.
 8 Q. Okay. But that didn't stop you working there; no?
 9 A. No.
 10 Q. You knew there were going to be protestors and you still
 11 took the employment?
 12 A. Yes, I did.
 13 Q. Okay. Then your first experience on 21 March, you drive
 14 into work, people shout, you say at you --- several
 15 protestors began shouting at you, "Scum" and "Evil cow"?
 16 A. Yes, that's correct.
 17 Q. There's no evidence of this, but I'm prepared to accept
 18 that those words, "Scum" and "Evil cow", were indeed
 19 spoken. But there's no evidence in here to say that ---
 20 especially "Evil cow", you're not suggesting that "Evil
 21 cow" was said by me, are you?
 22 A. No, not by you.
 23 Q. Good. So you go in, you hear some shouting, there's
 24 protestors on the verge, and this alone causes you ---
 25 what's the word you use? --- this alone causes you some

1 fear, doesn't it, just the fact that there are
 2 protestors?
 3 A. Yes, I was scared.
 4 Q. Pardon? I didn't catch your last answer, sorry.
 5 A. Yes, I was scared.
 6 Q. You're employed on 21 March, so this is post-injunction.
 7 This is --- as you said, people are across the road,
 8 they're not blocking the gates, but still you're scared.
 9 I'm not taking away your scaredness, you have every
 10 right to feel however you want to feel, but I'm just
 11 challenging --- my job here is to see how much of this is
 12 based on your personal opinions and how much is based on
 13 actually what's going on in front of you. But here you
 14 see some protestors --- I am sorry. If you'd have
 15 seen --- what protesting --- can you think of a scenario
 16 of protestors that wouldn't have made you scared? So
 17 imagine going past the gates and there were protestors
 18 there, do you think any protestor would have made you
 19 scared at that point?
 20 A. If they were calm and peaceful and not shouting abuse,
 21 I probably wouldn't have been scared.
 22 Q. Okay.
 23 A. But the fact is they came towards my car and were
 24 shouting abuse at me whilst I was waiting to turn into
 25 site.

1 Q. Okay. It doesn't say in your statement they came
 2 towards you, but, even if they had -- so along as the --
 3 if the protestors -- what's the word you used? -- quiet,
 4 peaceful, perhaps not shouting?
 5 MS BOLTON: "Calm and peaceful".
 6 A. "Calm and peaceful".
 7 MR CURTIN: So this experience of you driving past, knowing
 8 that you're going to see them -- you've already told
 9 me -- it still made you really scared? Remember, I'm
 10 not saying that you weren't feeling really scared, but
 11 it made you feel really scared; is that correct?
 12 A. Yes, it did.
 13 Q. "... I could hear the protestors continuing to shout
 14 abuse at me ..."
 15 Yes?
 16 A. Yes, I could.
 17 Q. Why do you think they were shouting at you? Just
 18 confirm that.
 19 A. Because at that point I was sitting stationary in my
 20 car, waiting for the gate to open, and they were still
 21 shouting abusive words at me.
 22 Q. Okay.
 23 A. I was the only person around that was not part of the
 24 protestors and I could hear things like "Evil bitch"
 25 being shouted.

1 Q. So that was on 21 March, and are you still in employment
 2 there?
 3 A. Yes.
 4 Q. So since 21 March 2022, you've driven in shall we say
 5 countless times?
 6 A. Yes.
 7 Q. And do you still get scared? Just answer, whether you
 8 if --
 9 A. I am not (inaudible - overspeaking).
 10 Q. Do you still get scared about people shouting -- across
 11 the other side they are shouting things. You said "Evil
 12 bitch".
 13 A. Yes, they do still shout things and it does make me
 14 nervous.
 15 Q. But is it the reality -- whether it's "Evil bitch" or
 16 "Puppy killer", do you still take it -- do you always
 17 take everything that's shouted at you by the protestors
 18 personally?
 19 A. I don't take it personally, no, but when I'm the only
 20 person around that they are shouting at, it's aimed
 21 towards me.
 22 Q. Okay, good. On paragraph 10:
 23 "... the protestors continuing to shout ... at me,
 24 and I was worried they would follow me ..."
 25 What was that based on?

1 A. That was based on, after I had spoken to colleagues that
 2 were inside site, they had said about people being
 3 followed before and that there was the threat of it.
 4 Q. To your knowledge, have you been followed?
 5 A. Not that I am aware of.
 6 Q. Okay, paragraph 11. So I don't know how to put this but
 7 you said you're scared for your own -- would you say --
 8 would you say you were a person of nervous disposition
 9 or would you say you were generally a tough cookie? I'm
 10 just interested to know.
 11 A. I do suffer from anxiety but I can generally get through
 12 things.
 13 Q. Did you suffer from anxiety before you worked at MBR?
 14 A. Yes, I did.
 15 Q. In paragraph 11 you're scared for your safety and you
 16 cannot stop thinking about the pictures that you've
 17 seen. That's correct, isn't it?
 18 A. Yes, that's correct.
 19 Q. But this is not necessarily based on what's happening;
 20 it's based on some supposition and some fears that you
 21 previously had and the fears that these things maybe
 22 could manifest themselves as opposed to what's happening
 23 in front of you. You were scared of an escalation.
 24 There's one thing, people shouting, but was your -- that
 25 scared you, but can I say your greater fear would be

1 that things could get a lot worse than this?
 2 A. Yes, it was, which it has done more than once.
 3 Q. To you? Has anything happened to you whilst working at
 4 MBR?
 5 A. Yes.
 6 Q. Beyond shouting?
 7 A. Yes, it is within my statement.
 8 Q. Could you refer me to it?
 9 MR JUSTICE NICKLIN: Paragraph 18 would be the first.
 10 MR CURTIN: Okay. We'll come to that in time. I want to go
 11 through this chronologically. We'll come to
 12 paragraph 18.
 13 Do you accept that there are people in this country
 14 that are opposed to experiments on animals?
 15 A. Yes, I do.
 16 Q. Do you accept that's a legitimate position to hold?
 17 A. I believe all opinions are legitimate to a point.
 18 Q. Do you feel it appropriate that people should protest
 19 about those sincerely held beliefs about animal
 20 experiments?
 21 A. Yes. Protesting I do not have a problem with.
 22 Q. Do you accept that MBR Acres breed puppies to sell to
 23 laboratories, number one?
 24 A. Yes.
 25 Q. And do you accept that MBR Acres has a licence to bleed

1 dogs and sometimes bleed dogs to death? Would you
 2 accept that?
 3 A. Yes.
 4 Q. And, therefore, if people were going to protest about
 5 animal experiments, outside the gates of MBR would be
 6 a legitimate place for that to be carried out; would you
 7 accept that?
 8 A. It would, but the way it is currently happening is not
 9 the way I agree with.
 10 Q. But you accept that there is a legitimate right to
 11 protest and outside the gates of MBR would be a perfect
 12 place to hold that demonstration -- not perfect, I don't
 13 ask you to accept, but do you accept that some people
 14 would have a valid reason why they would want to protest
 15 outside those gates?
 16 A. Yes, I do.
 17 Q. In that protesting, that must involve -- well, you
 18 talked about what you'd want, them to be very, very
 19 quiet, by the sound of it, and very, very peaceful, but
 20 would you accept that in a demonstration, legally,
 21 people are going to get -- we're dealing with puppies
 22 here, full of emotion, there's going to be anger,
 23 there's going to be shouts. Would you accept that it's
 24 valid to shout and scream and make a lot of noise and be
 25 animated and show the amount of passion? Would you

1 accept that that's a right that people have got?
 2 A. It is not the shouting that I have a problem with. You
 3 can shout as much as you want, and that could be part of
 4 protest. It is when abuse is starting to be shouted at
 5 us and we are being called names. That is past
 6 protesting and harassing.
 7 Q. Okay. I'm just going to ask you about one of those
 8 names, "Puppy killer". How does it feel to be called
 9 a puppy killer?
 10 A. Horrible.
 11 Q. Horrible. Are you a puppy killer? Does your employment
 12 involve killing puppies?
 13 A. No, that is not one of my jobs.
 14 Q. Okay, I'll take that. I'll accept -- yes. Is part of
 15 your job preparing dogs, puppies, to be sent to
 16 laboratories to be experimented on?
 17 A. We raise dogs.
 18 Q. You raise dogs?
 19 A. We don't prepare them for anything. We raise them.
 20 Q. Okay. Is one of your jobs to help MBR -- you can tell
 21 me the company -- you can tell me what you want -- what
 22 your job role is, but I'm not particularly interested --
 23 but working for MBR, you raise dogs, puppies, for -- and
 24 those puppies are then sold --
 25 MR JUSTICE NICKLIN: Mr Curtin, the better question --

1 MR CURTIN: Please.
 2 MR JUSTICE NICKLIN: -- following your line is she has said
 3 she is not personally involved in any of the procedures
 4 that lead to a dog dying. I think the point you want to
 5 make is: do you accept that people will see you as
 6 working for an organisation at which these things occur?
 7 MR CURTIN: Yes. I was more -- I was going to add that you
 8 work for a company that sells dogs to laboratories; yes?
 9 A. Yes, I do.
 10 Q. And that those experiments in the laboratories, for
 11 example, the -- are you aware of the nature of, for
 12 example, toxicology tests, where dogs are killed at the
 13 end of those experiments?
 14 MR JUSTICE NICKLIN: No, Mr Curtin, you've misunderstood the
 15 words "toxicology tests". We don't need to go back over
 16 that because it's not relevant for this witness.
 17 MR CURTIN: Okay. I'll move on.
 18 MR JUSTICE NICKLIN: No, you're in the right area but you're
 19 not asking the right question. The question -- I'll put
 20 the question; all right?
 21 MR CURTIN: If I can -- it would be my case that
 22 a toxicology test, they are euthanised and killed at the
 23 end every time. Every dog is -- no one survives.
 24 MR JUSTICE NICKLIN: No, no, that is not the purpose of
 25 a toxicology test and we're not going into that because

1 it's not relevant.
 2 MR CURTIN: They're post-mortem'd -- they're all
 3 post-mortem'd. All of them are post-mortem'd. It must
 4 be the --
 5 MR JUSTICE NICKLIN: That's not the evidence, I don't think
 6 you're right, it's not relevant anyway and I'm not going
 7 to decide it.
 8 MR CURTIN: My Lord, I would disagree. It's an integral
 9 part of a toxicology test to carry out a post-mortem.
 10 They bleed --
 11 MR JUSTICE NICKLIN: It may be, it may be, but -- Mr Curtin,
 12 I don't want to spend time on this, but you're wrong
 13 about toxicology tests. The purpose of carrying out
 14 a toxicology test is not to introduce a drug that will
 15 kill the dog. That's not the purpose of it. The
 16 purpose is to find out whether it does have that as
 17 a potential side effect. It's not the intention in
 18 a toxicology test to kill the animal.
 19 MR CURTIN: The post-mortem is an intention to kill, and
 20 that happens to every single dog in a toxicology test --
 21 MR JUSTICE NICKLIN: Mr Curtin, I am not in a position to
 22 adjudicate upon these things.
 23 MR CURTIN: Okay.
 24 MR JUSTICE NICKLIN: I have said more than once it's not
 25 relevant; okay? We are not going to spend time on this

1 repeatedly. You've got to accept my rulings.
 2 MR CURTIN: I do, and I'm prepared to move along because the
 3 witness will have very limited experience.
 4 MR JUSTICE NICKLIN: Okay, but you've lost -- what you've
 5 done by following a thread that has led you off course
 6 is you've forgotten now the thread that you were
 7 importantly pursuing, which is about the question as to
 8 whether -- where you're asking the witness whether she
 9 accepts that, because she works for MBR Acres, that
 10 makes her and the other employees who work there
 11 a potential target for protest.
 12 MR CURTIN: I understand.
 13 MR JUSTICE NICKLIN: One of the reasons is, even if she
 14 doesn't carry out the procedures you're objecting to
 15 herself, she is part of the organisation that does.
 16 MR CURTIN: I understand.
 17 MR JUSTICE NICKLIN: Those are the points that you wanted to
 18 put. Now, you've got the first bit but you haven't got
 19 the second bit, which I was trying to help you with,
 20 which is about whether the witness accepts that, even
 21 though she doesn't carry out the procedures that lead to
 22 any of the dogs dying, she is part of an organisation
 23 that (a) that does happen and (b) that organisation
 24 sends animals to laboratory testing.
 25 MR CURTIN: Okay. Could you help me out then? Could you

1 finish that final one on my behalf?
 2 MR JUSTICE NICKLIN: Right. Employee AF, I think you've
 3 heard everything that's been discussed, but can I just
 4 ask you this: it's part of Mr Curtin's case that the
 5 protests that take place are not directed at you
 6 personally but because you are an employee of an
 7 organisation which carries out various procedures to
 8 which Mr Curtin objects. Now, would you accept that you
 9 recognise that it is because you are an employee of
 10 MBR Acres that makes you a target for the protestors?
 11 A. Yes, I accept that.
 12 MR JUSTICE NICKLIN: Right.
 13 MR CURTIN: Thank you.
 14 Paragraph 12, you talk about face covering and that
 15 you were advised by other colleagues that you should
 16 mask -- that you should hide your identity -- yes? --
 17 that you should mask up?
 18 A. Yes.
 19 Q. So was it -- were you warned -- when you were given
 20 employment by the company, were you warned this
 21 initially, because it seems to me that you should have
 22 been because -- no. Were you warned by the company
 23 after -- between the job interview -- the successful job
 24 interview and going to work that you should hide your
 25 identity? Were you warned?

1 A. No, I was not, because I was speaking with an agency
 2 that was recruiting me for them.
 3 Q. It's only because your identity -- by driving in without
 4 a mask, it's a bit late to cover your identity. That's
 5 all, isn't it?
 6 A. Yes.
 7 Q. Paragraph 13. It's when you leave work -- so you've
 8 left -- when you arrived at work and you saw the
 9 protestors, that gave you a level of fear and even
 10 terror, and it's the same when you leave, just
 11 driving --
 12 A. Yes, it was.
 13 Q. "... there seemed to be far more protestors present than
 14 there were that morning ..."
 15 So again what wasn't intimidating was perhaps one
 16 person 20 metres up the road with a banner, but the fact
 17 there was more people than that -- just the fact that
 18 there were protestors there intimidated you. There's
 19 nothing wrong with having that feeling. I'm just going
 20 through your statement. Just the fact that there were
 21 extra demonstrators was alone to add to your
 22 intimidation; is that correct?
 23 A. Yes, it was, because I was imagining pictures of what
 24 I'd seen in the news.
 25 Q. You found it -- that day -- you got shouted -- you were

1 shouted at and you found it distressing. That's the
 2 case, isn't it?
 3 A. Yes.
 4 Q. So paragraph 15, it talks about you getting a dashcam.
 5 A. Yes.
 6 Q. You talked about a final straw when protestors showed
 7 you some extreme aggression, and this is your final
 8 straw, to buy a dashcam. Do you remember any details
 9 about the extreme aggression that you speak of in
 10 paragraph 15?
 11 A. I don't remember who it was, but it was multiple people
 12 standing in the road, putting placards in front of our
 13 cars, shouting particularly aggressively.
 14 Q. Okay. Have you had that dashcam on your car ever since?
 15 A. Yes, I have.
 16 Q. Does it -- have you used it as you've driven in and out
 17 of work since March 2022?
 18 A. Yes.
 19 Q. Do you submit any of it today as evidence against me for
 20 causing you any alarm, harassment, distress, violence,
 21 aggression, intimidation? Have there been incidents
 22 that you need to show with your dashcam footage?
 23 A. Not directly towards you, no.
 24 Q. Okay. If we go to page 6, paragraphs 20, 21, 22,
 25 et cetera, that deals with an incident where you --

1 where the gate was blocked by some protestors; yes?
 2 A. If I could just, please, go to the statement so I can
 3 refer to which day.
 4 Q. Yes, 30 July 2022. I think it's when there were two
 5 demonstrators sitting on chairs in front of the gate, if
 6 that helps you.
 7 MS BOLTON: I think, my Lord, the witness is probably asking
 8 the court for that permission.
 9 MR JUSTICE NICKLIN: Oh, yes, certainly. If you're referred
 10 to a paragraph in your witness statement, you can
 11 certainly look at that, yes.
 12 A. Oh, thank you. Paragraphs 20, 21 and 22?
 13 MR JUSTICE NICKLIN: Well, it goes on, but you'll get
 14 a flavour from the incident that's being referred to by
 15 looking at those paragraphs.
 16 A. Yes. I remember which day, my Lord. Thank you. Could
 17 the question please be repeated? I don't remember what
 18 you asked.
 19 MR CURTIN: I haven't asked you a question. It's just that
 20 you mention me in your statement, but basically you
 21 mention me as one of the protestors across the road,
 22 saying things like, "Going down ..." -- oh, no,
 23 that's -- I'm just mentioned that I was there, really,
 24 as a protestor, which I don't deny, but there's
 25 nothing --

1 A. Yes, you didn't --
 2 Q. Yes. So, for what it's worth -- so you drive to work,
 3 there's two protestors blocking the gates. The police
 4 are called, I believe, and the protestors are removed,
 5 allowing you to go to work; yes?
 6 A. We were already in work at the time. They blocked the
 7 gate whilst we were in work and we were not allowed to
 8 leave.
 9 Q. I beg your pardon, yes. It was some obstruction to you
 10 leaving, but it didn't stop you leaving, did it? There
 11 was a protest, you were prevented from leaving for
 12 a while and then you left; that's correct?
 13 A. It stopped us leaving for multiple hours and the police
 14 had to be called, who in turn moved the protestors to
 15 the side so we could leave.
 16 Q. Yes, and that happened whilst -- were you surprised to
 17 see that because -- you think of the injunction. That
 18 might have stopped that behaviour. Were you surprised
 19 to see people blocking the road?
 20 A. Yes, definitely.
 21 Q. Okay, let's go on to the last section, just a few more
 22 questions. Paragraphs 42 onwards.
 23 "The protestors' behaviour towards me is very
 24 distressing and upsetting, and it is emotionally
 25 draining having to hear them shout abuse at me every

1 day, calling me things like 'bitch' and 'piece of
 2 shit'."
 3 A. Yes.
 4 Q. That's a generic statement, isn't it, the protesting --
 5 is it just the fact when they call you "Bitch" and
 6 "Piece of shit" or is it -- you said before you were
 7 intimidated just by the mere presence of protestors.
 8 Also you would find that distressing and upsetting
 9 unless -- I gave you the example of one person with
 10 a banner 20 metres away from the gate. Any form of
 11 protest seems to cause you some distress; would that be
 12 correct?
 13 A. No --
 14 Q. Noisy protest.
 15 A. -- if there is one person far enough away from the gate,
 16 just holding a banner, that would not distress me. If
 17 there were multiple people standing away from the gate,
 18 not blocking my path, holding a banner, that would not
 19 distress me. People standing in the road, blocking my
 20 path, shouting abuse at me, that is what distresses me.
 21 Q. And you have a fear of what that might -- there's always
 22 this fear, isn't there, of what else could happen?
 23 A. Yes.
 24 Q. Let's put it into some sort of proportion. One thing is
 25 being shouted at. Are you now -- would you say

1 you've -- is it possible to become a -- I'm asking you.
 2 Actually, are you accustomed to being shouted at a bit
 3 more -- a lot more or tell me how much more accustomed
 4 to being shouted at than you were on 21 March 2022.
 5 Are you now accustomed to being shouted at or does it
 6 still cause you stress?
 7 A. It still causes me upset and distress but my anxiety is
 8 not as heightened as it was on my first day.
 9 Q. Okay. I'm just going through your statement. You talk
 10 about your car was spat on on several occasions.
 11 A. Yes.
 12 Q. Did you report that to the police?
 13 A. No, not at the time.
 14 Q. Okay. Are you aware that you could have and, that being
 15 a horrible experience, that could have led to a police
 16 investigation?
 17 A. No, I was not.
 18 Q. Okay. Paragraph 43, you've talked about you've worked
 19 in other animal facilities for a number of years prior
 20 to joining MBR but none of those were as intimidating
 21 and terrifying as the MBR ones [sic]?
 22 A. No.
 23 Q. Could you expand on this, please? Were the jobs -- I'm
 24 not going to go on any -- were the jobs you were
 25 involved in -- did they involve animal experiments?

1 A. Yes.
 2 Q. Tell me about the demonstrations that you witnessed
 3 prior to MBR, the ones that were less terrifying. Tell
 4 me about a typical example of one of those, please.
 5 A. It would have been a much greater number of people and
 6 the road was shut — it was a pre-planned, scheduled
 7 event. The road was shut and they would march down the
 8 road. Police would be present to help maintain the road
 9 closures and things like that. And they would protest,
 10 they would chant and they would get on with their
 11 protesting and they would leave other people alone.
 12 Q. And what's the difference? Tell me the difference of
 13 that to what you witnessed on the first day.
 14 A. I could walk past them and they wouldn't call me names.
 15 I wouldn't be blocked on my path of walking down the
 16 road past them.
 17 Q. Where was this?
 18 MS BOLTON: That's not relevant.
 19 MR JUSTICE NICKLIN: Well, no, it is because she raised it.
 20 MR CURTIN: Yes. Where — are you aware — where was it and
 21 are you aware of the name under which the protestors
 22 went or gathered?
 23 A. I am not aware of the name of the group of protestors.
 24 It was a gathering of people and it happened in
 25 Central London.

1 Q. So these protestors were polite and quiet?
 2 A. They were not quiet. They would shout and they would
 3 make their voices known, but they were not rude. They
 4 would chant things and not call everybody names that
 5 walked past them.
 6 Q. And what do you remember them chanting?
 7 A. Things like "End animal testing".
 8 Q. Was this outside of your workplace?
 9 A. Yes.
 10 Q. Okay. Did it help you in your anxiousness that it
 11 had — the event — it was an event, it had a beginning,
 12 a middle and an end of relatively short duration and the
 13 next day there was nobody there, it was — it was
 14 basically a one-off. Did it help with your anxiety,
 15 that it was a one-off?
 16 A. Yes, it did help. It also helped that there were police
 17 present whilst it was happening.
 18 Q. Okay. So on your first day, when you were terrified,
 19 were you surprised to see that there were no — were you
 20 expecting to see police either on your drive in on your
 21 first day of work — were you expecting to see police?
 22 A. No, I was not expecting to see police.
 23 Q. Is that because you're aware of the injunction?
 24 A. It's because I was a little more realistic and didn't
 25 think that there would be police officers stationed at

1 a 24/7 protest camp.
 2 Q. I put it to you that before — there was a period before
 3 the injunction where indeed the police were there every
 4 single day, but you weren't there to witness that. On
 5 this day, on 21 March, there were no police. Would it
 6 have helped you if there had been police officers, in
 7 your anxiety?
 8 A. It perhaps would have helped, but it wasn't the fact
 9 that there was no police that caused the anxiety. It
 10 was the conduct of the protestors at site.
 11 Q. Okay. And since 21 March are you aware that there is an
 12 injunction and it's changed the reality on the ground
 13 and, since you've been working at the site, there are
 14 far less police than there used to be? Have you been
 15 told this by work colleagues?
 16 A. Yes, I have.
 17 Q. You say, paragraph 43, the last line:
 18 "... the protestors at the Wyton Site have been
 19 abusive, intimidating and made my work life a living
 20 hell."
 21 A. Yes.
 22 Q. What about if I was to put to you that indeed, you know,
 23 we need to put into account your anxiety and your
 24 worries and the fact that you've watched the news and
 25 became alarmed at that, but the protestors haven't made

1 your life a living — I would say — I would put it to
 2 you that that's a massive exaggeration to say the fact
 3 that there have been people shouting outside the gates
 4 has made your life into a living hell; you've heard some
 5 shouting and that's turned your life into a living hell.
 6 I put to you that's a gross exaggeration compared — in
 7 relation to the evidence that you've offered.
 8 A. I disagree.
 9 Q. Why —
 10 A. Being shouted abusive slurs and called names and having
 11 your life disrupted the way it is is very distressing
 12 and makes it hell.
 13 Q. But we're not talking about people shouting down a high
 14 street. We're talking about people protesting outside
 15 of a notorious puppy breeding facility that are involved
 16 in killing puppies. Are you able to balance the right
 17 of those protestors to shout and put that into some
 18 sensible scale which would then allow you to work and
 19 not for it to turn into a living hell, accepting that
 20 there are people who hold opinions and they want to
 21 profess them loudly? You should be able to cope with
 22 this, I put to you, in a bit of a stronger way than —
 23 it's too strong a reaction, I put to you, saying it's
 24 a living hell, that people have shouted at you whilst
 25 working in this controversial place. What have you got

1 to say about that?
 2 A. I accept that there are people with the opinions and
 3 I accept that there are people that wish to protest. If
 4 all the protestors at MBR Acres stood outside with their
 5 banners and chanted things like "Shut MBR down" or "End
 6 animal testing" and didn't make it personal abuse and
 7 harassment towards myself and my colleagues, I would not
 8 have a problem with that.
 9 Q. But tell me one single word that's ever been shouted to
 10 you that you actually take personally. Your work in MBR
 11 is not contested. Which bit? Which bit was personal?
 12 Which bit did you feel was aimed at you and was
 13 unnecessary, unsatisfactory, uncalled for? Which
 14 insult? Which abuse?
 15 A. There are multiple, but one in particular is when I am
 16 alone in my car, one of the protestors walks up to the
 17 window of my car and shouts into the loudhailer, "You
 18 evil cunt".
 19 Q. Yes, I hear what you're saying and -- but that's not
 20 something in your witness statement. If that had
 21 happened, the word -- I can see where you're coming from
 22 in that instance. But even that -- it's a very
 23 strong -- very, very strong thing to say. Did you ever
 24 put it in your mind that, "I am being called that by
 25 this protestor because I work at these gates -- because

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1 I work behind these gates. That's why they're calling
 2 me it. It's because of the work that I do for the
 3 company that I do and it's not personal"?
 4 A. It doesn't matter who you are. It should never be
 5 acceptable to call someone things like "Evil cunt".
 6 I have been called "Ugly witch", "Ugly bitch", "Evil
 7 cow". These types of things should not be acceptable to
 8 say to anyone, no matter who they are.
 9 Q. Okay, what about "Puppy killer"? Do you accept that
 10 people would have some rights -- it's not the most
 11 unreasonable thing in the world to call a worker who is
 12 driving into MBR, driving out, "Puppy killer". Can you
 13 see the reasonableness of that? Not that you agree with
 14 it, but can you see some scenario where you can accept
 15 in this universe that sort of thing is going to happen?
 16 A. I can see that some people might feel that way but
 17 I don't necessarily agree with it because there are also
 18 other professions which are accepted and -- where they
 19 put puppies to sleep but they are not a puppy killer.
 20 Just because we are in a different industry doesn't mean
 21 it's a different slur.
 22 Q. Okay. Last paragraph, 47 of your statement, you talk
 23 about -- and a lot of witnesses talk about this so
 24 you're not alone -- a significant anxiety being caused
 25 by being targeted at home; yes?

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1 A. Yes.
 2 Q. There's nothing in this statement to suggest that I,
 3 John Curtin, have targeted you at home, is there?
 4 A. No, there isn't.
 5 Q. On the Camp Beagle social media sites -- you've seen
 6 those, haven't you?
 7 A. Yes.
 8 Q. Are you aware -- let's go through this. Have you ever
 9 seen particular workers singled out for special
 10 attention, such as, "Person X is a puppy killer. Let
 11 this puppy killer know what you think of them. This is
 12 where they work. This is where they live", et cetera?
 13 A. Yes.
 14 Q. Oh, you have? On Camp Beagle?
 15 A. Not on Camp Beagle social media Facebook page, but
 16 I have seen it previously and have been shown pages
 17 elsewhere where it is shared.
 18 Q. Would it be fair -- because this is a significant
 19 anxiety and I have been targeted in my home so
 20 I understand how someone could see it as a significant
 21 anxiety, if things were taken home -- is it fair to
 22 say -- is it a relief to you that the Camp Beagle social
 23 media, with all the hundreds of thousands of people that
 24 look at it, have not targeted you or anybody in fact?
 25 Do you take some relief in that? Let me put it another

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1 way. Do you live in permanent dread of Camp Beagle
 2 exposing the fact that you work there? Do you live in
 3 that sort of dread that that could happen?
 4 A. Yes, it is a constant fear.
 5 Q. Do you experience -- have you ever sat down to
 6 experience any relief in the fact that it has not --
 7 that so far, on the Camp Beagle social media, has not
 8 happened?
 9 A. Yes, it is a relief that it has so far not happened but
 10 it is also still a dread that it will.
 11 Q. Would you acknowledge that -- well, I might be putting
 12 words in your mouth here. I put it to you that there's
 13 a specific -- one of the hallmarks of the Camp Beagle
 14 campaign, through our social media, has been not to make
 15 it personal, not to have a rogues gallery. There's
 16 a generic attack on MBR and it's not personal.
 17 Would you accept that from what you've seen so far?
 18 A. I have been shown posts previously where people's faces
 19 and names on Facebook have been shared, saying they are
 20 a puppy killer. I do not recall whether it was
 21 Camp Beagle's page as I was not a member of staff there
 22 and it was old screenshots.
 23 Q. Okay. Well, I put it to you that Camp Beagle has not
 24 targeted individual workers in that way and I'm just --
 25 you've already answered the question that there is some

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1 relief that so far you have not featured on Camp Beagle
 2 as a puppy killer because that would cause you,
 3 I imagine, an incredible amount of anxiety, I would
 4 imagine. Would that be correct?
 5 A. It already causes me anxiety because there is --
 6 Q. Would that anxiety be cranked up massively if you were
 7 to appear as a Camp Beagle post with your picture,
 8 "Here's a puppy killer"? What would that do in levels
 9 of your harassment and intimidation fear?
 10 A. That would make me feel terrified --
 11 Q. Yes.
 12 A. -- and I would constantly be on edge, even more so than
 13 I already am.
 14 MR CURTIN: I have no further questions.
 15 MR JUSTICE NICKLIN: Thank you.
 16 MS BOLTON: My Lord, it's not a point for re-examination.
 17 It's a point for the transcript because otherwise
 18 I think it's possibly going to read wrong. It's at
 19 [draft] page 94, from line 19 onwards. Mr Curtin was
 20 asking the witness about whether the protests at MBR
 21 were more terrifying than other protests that she had
 22 experienced. He slightly clipped his question and
 23 I think the transcript is going to reflect that his
 24 question was that MBR was more terrifying than other
 25 facilities, and the witness followed his trail of what

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1 he was asking and so answered his question. So I just
 2 raise that now so that the transcript can be corrected
 3 because Mr Curtin was asking about the protests, but
 4 I think he shortened his question a bit. There were
 5 a number of questions and the witness went on to give an
 6 answer, so I'm just concerned the transcript will read
 7 wrong.
 8 MR JUSTICE NICKLIN: Okay. Well, is Mr Curtin getting the
 9 transcripts?
 10 MS BOLTON: He is, yes.
 11 MR CURTIN: But I meant the protests, not --
 12 MS BOLTON: Yes, but (inaudible).
 13 MR JUSTICE NICKLIN: If the two of you get your heads
 14 together when you get the transcript and if you are
 15 agreed about what changes -- if it's wrong, what changes
 16 should be made, and if you're at odds about it, then
 17 I'll have a look at it; all right?
 18 MS BOLTON: Yes, okay, my Lord. I simply flag it
 19 because I --
 20 MR JUSTICE NICKLIN: Thank you very much.
 21 MS BOLTON: My Lord, I have no questions in re-examination.
 22 MR JUSTICE NICKLIN: Right. Employee AF -- I apologise that
 23 I'm having to address you in that way, but you'll
 24 understand the reasons why -- thank you very much for
 25 giving that evidence. That completes your involvement

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1 in the trial. Thank you, again.
 2 A. Thank you.
 3 MR JUSTICE NICKLIN: Right. Do you want to take a little
 4 break?
 5 MS BOLTON: My Lord, yes. I was going to suggest that would
 6 be a good moment.
 7 MR JUSTICE NICKLIN: All right. Let's regroup at 3 o'clock
 8 then. All right. Thank you very much.
 9 (2.46 pm)
 10 (A short break)
 11 (3.01 pm)
 12 MR CURTIN: My Lord, I just want to draw attention to
 13 something this next witness has said, just to explore --
 14 MR JUSTICE NICKLIN: Okay, let me just get your evidence
 15 bundle. Right, which tab is it in? What page number?
 16 MR CURTIN: D11, 776, paragraph 146, page 34.
 17 MR JUSTICE NICKLIN: 776. Just a minute. I'm just getting
 18 there. I've got page 34. Paragraph number ...?
 19 MR CURTIN: 146, but it's the latter half of the paragraph
 20 where -- "and partly this is because of protestors
 21 constantly telling me that we are abusers and we harm
 22 dogs [as read]". Then they go on to talk -- well, read
 23 it. It talks of compassion and ...
 24 MR JUSTICE NICKLIN: Hmm--hmm.
 25 MR CURTIN: Now, I am extremely frustrated with your ruling

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1 about this is not to do with what goes on that side of
 2 the fence. That's my rough understanding. No matter
 3 what goes on there, no matter -- even if it was illegal,
 4 you must address ... but here I have a witness statement
 5 and I'm going to challenge this and I'm -- I don't want
 6 to be seen as difficult when I'm doing that. I need to
 7 stretch the boundaries of what you put. If you hadn't
 8 put those boundaries, you're correct, we could have been
 9 here a year because I would have --
 10 MR JUSTICE NICKLIN: I said to you -- I appreciate that you
 11 see me as a judge and therefore somebody who is
 12 responsible for adjudicating on things, but my role is
 13 actually much more limited. I have a job to adjudicate
 14 on the issues that are brought before me as a judge in
 15 the litigation that I'm deciding. I don't have a roving
 16 responsibility to fix things that are wrong in society,
 17 even if I could embark upon that task. I can't do that.
 18 And there are other people in our society who are
 19 responsible for dealing with anybody's complaints about
 20 what happens in a facility like MBR Acres. It's not for
 21 judges of the High Court to do that job, unless it
 22 specifically arises in the context of a piece of
 23 litigation, and it doesn't in this litigation.
 24 Now, let me put your mind at rest I think to an
 25 extent, which is I've seen what you've drawn my

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1 attention to. You are entitled to say -- really it's
 2 a question of definition. You and the witness disagree
 3 or are likely to disagree about what is harming animals
 4 and what counts as abuse of animals.
 5 MR CURTIN: Yes.
 6 MR JUSTICE NICKLIN: Now, it's unlikely that you and the
 7 witness are going to agree about that and ultimately I'm
 8 telling you that I'm not going to decide that point, but
 9 you are entitled -- because each of these witnesses --
 10 as you've been doing in the course of the trial, each of
 11 these witnesses is coming along and explaining why they
 12 are upset by the protest activity and you are
 13 legitimately probing with them the extent to which each
 14 of the individual witnesses accepts that the course of
 15 their employment involves certain activities with
 16 animals which are objected to by sectors of society,
 17 including those who are protesting outside MBR Acres.
 18 It's legitimate for you to explore that with the witness
 19 and, as you've been doing, to say, "Well, can't you
 20 recognise that people are opposed to this and what takes
 21 place at MBR Acres?".
 22 MR CURTIN: I'm glad I asked you the question. I've got
 23 some understanding now.
 24 MR JUSTICE NICKLIN: Right, okay. Now, we're going to need
 25 to do the ...

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1 MS BOLTON: My Lord, yes.
 2 MR JUSTICE NICKLIN: I'm sorry, again. I'm going to have to
 3 ask you to just step outside for a short while, while we
 4 just get the next witness ready. Thank you very much.
 5 (Hearing in private)
 6 MR JUSTICE NICKLIN: Have we deactivated this screen? We
 7 have. Good. We're getting the drill down now.
 8 Okay. Activate the camera, please.
 9 Are you able to hear us? We can't hear you at the
 10 moment.
 11 THE WITNESS: Can you hear me now?
 12 MR JUSTICE NICKLIN: Yes, that's great. Thank you very
 13 much.
 14 Ms Bolton.
 15 MS BOLTON: My Lord, my next witness is Employee J, who is
 16 [redacted]. Her witness statement can be found in the
 17 persons unknown bundle at page 1609.
 18 EMPLOYEE J (affirmed)
 19 Examination--in--chief by MS BOLTON
 20 MS BOLTON: Good afternoon. There's a bundle in front of
 21 you, and if I could ask you to turn to page 1609,
 22 please.
 23 A. I'm on page 1609.
 24 Q. You should see something that says "First witness
 25 statement of Employee J".

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1 A. Yes, that's in front of me.
 2 Q. If I could ask you, please, to turn to page 1643 --
 3 A. I'm on 1643.
 4 Q. -- did you sign off that witness statement?
 5 A. I have and I did.
 6 Q. There's an exhibit that follows that from pages 1644 to
 7 1648. Is that the exhibit to your witness statement?
 8 A. Yes.
 9 Q. Is that witness statement still true to the best of your
 10 knowledge and belief?
 11 A. Yes.
 12 MS BOLTON: Thank you very much.
 13 MR JUSTICE NICKLIN: Thank you very much for confirming
 14 that. We're going to cut the video feed now so that --
 15 and we'll let the public back into court. One thing,
 16 please, I must ask you when you're giving your evidence
 17 is, if you're asked to look at your witness statement,
 18 that's absolutely fine, look at it and you'll be told
 19 which paragraph you're going to be asked questions
 20 about, but apart from that, please don't yourself refer
 21 to the witness statement during the evidence. If you
 22 need to do that, please ask me; all right? It's just
 23 one of the things that, when giving evidence in court,
 24 I would be able to see what you're looking at, but
 25 I won't be able to when the video feed is cut so I've

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1 got to ask for you to do that, please, when I can't see
 2 you.
 3 A. That's not a problem.
 4 MR JUSTICE NICKLIN: Right. Thank you very much. We'll cut
 5 the video feed and then we'll get the public in.
 6 (Hearing in public)
 7 MR JUSTICE NICKLIN: Right. Mr Curtin.
 8 Cross--examination by MR CURTIN
 9 MR CURTIN: Good afternoon. I've got a number of questions
 10 but hopefully we can fit it all in the next hour so you
 11 don't have to be called back tomorrow. Let's see if we
 12 can achieve that.
 13 I want to go through your statement chronologically.
 14 I've made some marks so I'm just going to do it
 15 literally as we go along. How long have you worked at
 16 MBR? So I just want to establish that you were already
 17 employed by the time of Camp Beagle -- is that
 18 correct? -- in the summer of -- you were working there
 19 before the summer of 2021? Were you working there
 20 before summer 2021?
 21 A. So I have been working in -- I have been working for MBR
 22 since September 2019 and my employment ended
 23 in August 2022.
 24 Q. Did you have a specific job role?
 25 MR JUSTICE NICKLIN: It's not relevant, Mr Curtin.

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1 A. My role —
 2 MR JUSTICE NICKLIN: Don't worry. You've done — with other
 3 witnesses, you've come on to it in due course usually.
 4 You can ask whether she is involved — we all know about
 5 the various procedures.
 6 MR CURTIN: Yes, that's why I asked.
 7 MR JUSTICE NICKLIN: Okay. Well, you just asked the more
 8 direct question.
 9 MR CURTIN: Yes, I'll come to that then.
 10 Paragraph 8:
 11 "During the summer of 2021, the protests outside the
 12 Wyton Site became more intense, and it was not possible
 13 to enter or exit the Wyton Site safely."
 14 It's just — I'm asking this question just because
 15 I read it a number of times. I've read a very similar
 16 statement in other people's statements. Did you write
 17 this statement of your own volition or were you guided
 18 by the claimants' solicitors?
 19 A. I wrote this statement in my own words.
 20 Q. Okay. The end of paragraph 8 you've talked about, if
 21 the police were not present at the site, then you would
 22 be unlikely to try and enter. But isn't it a fact that,
 23 in those early days, the police were present every day,
 24 and every day when the workers wanted to arrive in the
 25 morning and leave in the evening, there were police

1 present? Is that correct?
 2 A. May I just have a second to read my statement?
 3 Q. Yes, sure.
 4 A. It is true that police was often required to give
 5 assistance for us entering and exiting site.
 6 Q. Okay.
 7 A. However, if the police would not be in attendance, then
 8 we would not necessarily attempt to enter.
 9 Q. Okay.
 10 MR JUSTICE NICKLIN: Can I just clarify whether you are
 11 speaking there hypothetically in the sense that, in
 12 summer 2021, had the police not been there, it is your
 13 view that it would not have been possible safely to
 14 enter the facility or are you saying there were
 15 occasions in that summer of 2021 when the police were
 16 not present and that it was not safe to enter?
 17 Hello?
 18 A. I'm still here. I'm just reading the transcript so
 19 I can catch up.
 20 MR JUSTICE NICKLIN: What?
 21 A. I'm just reading the transcript so I can catch up on the
 22 question —
 23 MR JUSTICE NICKLIN: What transcript?
 24 MS BOLTON: It's LiveNote, my Lord.
 25 MR JUSTICE NICKLIN: Why has the witness got LiveNote?

1 MS BOLTON: Everyone has got LiveNote, my Lord, both in
 2 court and out of court.
 3 MR JUSTICE NICKLIN: Well, a witness wouldn't be provided
 4 with LiveNote.
 5 MS BOLTON: I think they've always had — they've had it in
 6 the witness box and everyone's got it. LiveNote is
 7 available for everybody in the proceedings.
 8 MR JUSTICE NICKLIN: Okay. What control do they have to
 9 look back over what's been said?
 10 MS BOLTON: I don't believe they do. It's only when they're
 11 sitting in the witness box it's in front of them. It's
 12 not any other time.
 13 MR JUSTICE NICKLIN: Right.
 14 A. Could you repeat the question, please?
 15 MR CURTIN: Your Honour, my Lord, sorry.
 16 MR JUSTICE NICKLIN: Yes, I've not got LiveNote so I'll have
 17 to think about it again. I'm trying to work out from
 18 your answer whether you are speaking hypothetically —
 19 in thinking back to 2021, the summer period, whether you
 20 are saying that you believed that if the police had not
 21 been there, it would not have been possible to safely
 22 enter the Wyton site or whether you are saying that
 23 there were actual occasions when the police were not
 24 there in the summer of 2021 when you felt or made the
 25 decision that it was not safe to enter the Wyton site

1 because of the protestors.
 2 A. There were occasions that the police was not present for
 3 us to enter the site.
 4 MR JUSTICE NICKLIN: Right. Roughly how many occasions can
 5 you recall?
 6 A. I do not remember.
 7 MR JUSTICE NICKLIN: Okay.
 8 MR CURTIN: I put it to you that you may be mistaken there
 9 because it would be my case that, until the injunction,
 10 the police were there every day. I would put it to you
 11 that is a hypothetical — is it possible, even possible,
 12 that that's a hypothetical statement?
 13 A. Could you rephrase the question, please?
 14 Q. The judge has just asked you for — are you talking
 15 hypothetically or specific information and you gave
 16 a vague answer that you do remember [sic]. I put it to
 17 you that each time the workers in the morning would
 18 arrive, the police would be in attendance until the
 19 final worker arrived and the police would be in
 20 attendance when the workers left and they would stay
 21 until the last worker left. Is it — I put it to you
 22 that that last bit is hypothetical, about you might not
 23 go in if the police weren't there.
 24 A. If the police was not present, we would not go there.
 25 Q. All right. Let's move on. Paragraph 9, towards the

1 end -- this is just a simple question:
 2 " ... whilst threatening me and my loved ones and
 3 abusing me in an angry and intense manner."
 4 First of all, "loved ones", does that refer to your
 5 work colleagues? I just want to understand. It's an
 6 unusual --
 7 A. Can I just refer back to my statement?
 8 Q. Yes. It's just that if it's work colleagues -- it's up
 9 to you how you describe them. I'm just asking you, "Is
 10 it them?". It's an unusual way to describe work
 11 colleagues. I'm asking you, do you mean your work
 12 colleagues?
 13 A. "Loved ones" would be colleagues.
 14 Q. Okay. You talked about not being able to escape the
 15 situation quickly and safely and that made you feel very
 16 anxious. I can understand that. You know, any form
 17 of -- you know, when you're in a car and there's
 18 protestors and they're shouting at you, there's bound to
 19 be some level of anxiety, but we've got to balance that
 20 up against the rights of the protestors to shout. So,
 21 so far so good. We've got to deal with some specific
 22 incidents, but would you accept that your anxiety is on
 23 an acceptable level? You feel anxious and you can't get
 24 away from the situation, but it will be over soon, the
 25 protestors are there and your anxiety is to some

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1 degree -- yes, it's acceptable?
 2 A. I would disagree on the side that, when I've been
 3 leaving the site and protestors have been surrounding my
 4 car, due to the fact of how close it is to the highway
 5 and as a driver, not being able to see where we are
 6 turning to for the oncoming traffic, it does have an
 7 impact with safety, not only on the side as a driver but
 8 also with the protestors in that sense --
 9 Q. Yes.
 10 A. -- so --
 11 Q. Yes, it's not contentious. So your anxiety -- things
 12 like road safety, not being able to see clearly left and
 13 right, is bound to cause you some anxiety, I'm agreeing
 14 with you so we can move on.
 15 Paragraph 13, you talked of -- so since the summer
 16 of 2021 there had been protests at the gates and until
 17 the injunction a lot of those protests were across the
 18 other side of the road. So protests causing some
 19 disruption of the traffic, some limited, very limited,
 20 was normal, but you've talked here, in paragraph 13,
 21 about the more unusual incidents, where that wait was
 22 far longer than just a few minutes; yes?
 23 A. Yes, that's correct. We've not -- rather not for a few
 24 minutes but for much longer than usual.
 25 Q. What was usual then?

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1 A. If we could not access the site and the police would all
 2 be coming to the entrance to guide us in, we probably
 3 would only wait for a certain amount of time which
 4 I cannot recall. However, on these particular
 5 occasions, the wait was much longer, whereas it would
 6 be -- it could be anything from up to half an hour.
 7 Q. Okay. And this is -- I don't wish to go into the why or
 8 the wherefores of the convoy, but this is while you used
 9 to -- once it was decided to go into a convoy.
 10 Would you accept the idea of the convoy came from
 11 a joint agreement between the workers, the management
 12 and the police? To go into convoy was a decision made
 13 by the workers, the police and -- jointly; yes?
 14 Would you accept that? You chose to drive in convoy, is
 15 my question -- you chose to drive in convoy -- not you,
 16 but collectively you chose that option; yes? I don't
 17 think it's so contentious.
 18 A. Yes, it was decided jointly and the police advised us
 19 that it would be safer to join -- to drive in a convoy
 20 so we were all together.
 21 Q. Yes. But you remember two occasions where the delay was
 22 much, much longer than -- if we can call it the usual
 23 one; yes?
 24 A. Yes.
 25 Q. In paragraph 15 you talk of a dashcam; yes? You talk

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1 about Employee Q would usually drive and turn their
 2 dashcam on; yes? Paragraph 15.
 3 A. Yes, that is correct.
 4 Q. Then paragraph 18, it wasn't long before you got
 5 a dashcam?
 6 A. Yes.
 7 Q. And that dashcam would record all the images. It would
 8 be on the continuous recording thing, would it, and it
 9 would record what's in front of you, and you could
 10 access it automatically if you needed to in hindsight?
 11 Basically the dashcam, it records everything? It's not
 12 a very good question.
 13 A. My dashcam was recording from driving on the highway to
 14 when we were entering site, so if there were anything
 15 that could impact on safety, it would be recorded, or if
 16 anything such as any abuse had been shouted at us, then
 17 that would be recorded.
 18 Q. What dashcam footage have you given as part of your
 19 evidence? I don't see any dashcam footage in your
 20 evidence, in your witness statement.
 21 MS BOLTON: There is dashcam footage.
 22 A. Can you just give me a second to have a look at my
 23 statement, please?
 24 MR CURTIN: Could you accept that there's no dashcam
 25 footage?

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1 MS BOLTON: No, I don't accept that.
 2 MR CURTIN: Oh, excellent. In here? What do you accept
 3 then? I'm just trying to save some time.
 4 A. I had been recording with my dashcam, however, I did
 5 seem to have a few issues with it. So on the nights
 6 that I'd been car-sharing, in paragraph ...
 7 MS BOLTON: I think it might be at 924. My Lord, I just say
 8 that if it's going to be put to the witness that there
 9 isn't something, then that should be known, if it's
 10 going to be challenged.
 11 MR CURTIN: Is it part of the persons unknown evidence?
 12 MS BOLTON: I can confirm there's none that concerns
 13 Mr Curtin specifically, but there is dashcam footage
 14 evidence referred to by this witness.
 15 MR JUSTICE NICKLIN: You don't need to worry about it,
 16 Mr Curtin. Nothing in your witness statement relates to
 17 dashcam footage.
 18 MR CURTIN: Is there ---
 19 MR JUSTICE NICKLIN: There may be in relation to the persons
 20 unknown.
 21 MR CURTIN: Can I ask, is it limited to one event, two
 22 events, three events? Is it many?
 23 MS BOLTON: My Lord, I have to go through every one of the
 24 videos because it's not one of my questions and check
 25 which ones are the dashcam and which ones are not.

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1 MR CURTIN: How many incidences do you think offhand,
 2 without referring to --- I'm interested in that --- how
 3 many incidences of dashcam footage did you ever have to
 4 present since July 2021? How many times did you hand
 5 your dashcam footage in to, say, security or the police,
 6 if you did at all?
 7 MS BOLTON: I ---
 8 MR CURTIN: Excuse me. I'm asking the question.
 9 MS BOLTON: I think one of those two questions is fair on
 10 the employee and the other isn't; how many were used
 11 is --- or how many were looked at may be ---
 12 MR CURTIN: Was it typical for you to, every week, give your
 13 dashcam footage to the security because of an unruly
 14 incident, an illegal incident? How many times did you
 15 submit your dashcam footage to either security or the
 16 police? It's quite a simple question.
 17 A. I did not submit any dashcam footage.
 18 Q. Thank you. Paragraph 20, you talk about your belief:
 19 "... the protestors would film us to intimidate us
 20 and post ... the videos to ... show their followers ...
 21 what our cars look like."
 22 Can I put to you that you don't know why protestors
 23 would film you? That's guesswork on your behalf.
 24 I could immediately put to you another reason why people
 25 would protest --- not you. If you felt you were being

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1 singled out, it would be different, but there's reasons
 2 why people would film outside the gates of MBR, which is
 3 to show the world the ins and outs of this extremely
 4 controversial place and have nothing whatsoever to do
 5 with intimidating you or showing followers what your
 6 cars look like. I put it to you that this first
 7 sentence is just wild speculation by you --- well,
 8 speculation.
 9 A. So could I ask what the main question is being asked
 10 here, please?
 11 Q. I'm just asking you to accept --- you say "I believe".
 12 I'm just asking you to accept that's literally what it
 13 is: your belief, based on your thought processes. I'm
 14 asking you to accept that there's other reasons, such as
 15 the legitimate right to film not only the protests but
 16 the ins and outs and the goings on of MBR. That's
 17 legitimate and has nothing to do with intimidation or
 18 following cars. Are you prepared to accept that
 19 there's --- this is just your narrow belief? You're
 20 entitled to that belief but it's just that. Do you
 21 accept that?
 22 A. I don't believe it was necessary to film the staff
 23 members in particular. I did feel that it did
 24 intimidate us as it was focused on our faces and ---
 25 Q. There's nothing in your witness statement ---

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1 MR JUSTICE NICKLIN: Mr Curtin.
 2 MR CURTIN: Sorry. Can't I do that? No?
 3 MR JUSTICE NICKLIN: You can't interrupt a witness while
 4 they're giving their evidence, no.
 5 MR CURTIN: Even if I'm calling to say that that's enough;
 6 no?
 7 MR JUSTICE NICKLIN: No.
 8 MR CURTIN: Okay. I'm only asking. I thought that ...
 9 MR JUSTICE NICKLIN: It's one of the basic rules.
 10 MR CURTIN: I apologise. I apologise. You were saying ---
 11 again I apologise.
 12 A. I was saying the reason that I don't think it was
 13 necessary was because we were afraid that anybody
 14 recognised from the videos could have been targeted
 15 outside of work on that matter.
 16 Q. Yes, I understand how that could cause you fear and it's
 17 a commonly expressed opinion in these statements, that
 18 people have a fear of being identified and then
 19 something happening away --- I understand that fear. But
 20 all I was asking you to do was to give --- to accept that
 21 there's another reading into why people should film,
 22 that's all. To give way --- and that this is your belief
 23 but it's not necessarily what people film for. It's
 24 just your belief. That's all. Everything in here is
 25 your belief. I'm just asking you to accept that there's

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1 other reasons to film the workers and the goings—on of
 2 MBR other than intimidation and terror tactics. Could
 3 you accept that?
 4 A. Could I just have a second to think, if that's okay?
 5 Q. Yes. (Pause)
 6 Can I help you? Say, for example, the
 7 Daily Mirror —
 8 MR JUSTICE NICKLIN: Mr Curtin.
 9 MR CURTIN: Right.
 10 MR JUSTICE NICKLIN: Okay. One of the disadvantages of this
 11 method of conducting cross—examination is that I can't
 12 see the witness so I don't know what's going on. The
 13 witness has asked for time to think about his or her
 14 answer. If he or she were in court, I almost certainly
 15 would grant that, but it's one of the difficulties that
 16 we have with this method, is that we just have to wait;
 17 okay?
 18 MR CURTIN: I'll wait.
 19 A. To answer my question — no, to answer your question —
 20 sorry — I still think that it's still not necessary to
 21 film people's faces. However, filming on site, I don't
 22 see the need to.
 23 Q. In my evidence bundle I ask you to accept there's
 24 a Daily Mirror headline — a double—page spread in
 25 a national newspaper, the headlines of which are "The

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1 horrors of a puppy factory". Would you accept — you
 2 might not think there's a reason to film the activities
 3 of MBR. Would you accept that there is a legitimate
 4 reason to film the activities of this company?
 5 A. I do not know.
 6 Q. Okay. That will do. Paragraph 21, there's talk of
 7 attacks on people's houses; yes?
 8 A. Yes. That's correct.
 9 Q. And there's no allegation made by you that I'm
 10 responsible for any of those actions, is there?
 11 A. No.
 12 Q. We've talked about the Camp Beagle social media. It's
 13 not your case that Camp Beagle's social media sites
 14 instigate, promote, this kind of activity, attacks on
 15 workers' houses, is it? I put it to you that — my
 16 question is that: do you hold Camp Beagle's social media
 17 pages responsible for promoting the sort of incidents we
 18 can see in paragraph 21?
 19 A. So may I just have a second?
 20 Q. Yes, no rush. (Pause)
 21 A. From paragraphs 21 onwards to 21.8, I do not see any
 22 evidence that it was directly Camp Beagle. However,
 23 with some of the phrases that had been mentioned, even
 24 though there is no proof, I cannot say whether it was
 25 Camp Beagle or not so I'm unsure.

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1 MR JUSTICE NICKLIN: Have you looked at Camp Beagle's social
 2 media channels?
 3 A. I used to sometimes when I was working there. I haven't
 4 had a look at any other posts that have been put on
 5 Camp Beagle since I left.
 6 MR JUSTICE NICKLIN: So far as you recall of the post that
 7 you saw, did you identify any postings that suggested or
 8 promoted or encouraged any of the actions that are set
 9 out in your paragraph 21?
 10 A. No. No, I didn't.
 11 MR CURTIN: Okay. Paragraphs 22 and 23 talk of the
 12 involvement of Hunt Saboteurs; yes?
 13 A. Yes, that's correct.
 14 Q. And this is information you were given by other people,
 15 Employee H and Employee Q?
 16 A. Yes.
 17 Q. This information that they were Hunt Saboteurs seems to
 18 add to your fear.
 19 A. From what Employee H and Employee Q had told me, was
 20 that they can be quite aggressive. I do not know much
 21 about the group personally(?), but knowing that
 22 information did increase my fear at the time.
 23 Q. Okay. I just want to go briefly now to a discussion
 24 about sort of canteen culture at work, if we can call it
 25 that. Did you used to talk about the protestors? It

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1 would be perfectly understandable if you did. Did you
 2 used to talk about the protestors during work or on
 3 a break — casual conversations about the protestors.
 4 Sorry, I might have said "workers". Did you used to
 5 talk about the protestors, gossip amongst each other,
 6 being a human being?
 7 For example, "There's Hunt Sabs there"?
 8 A. I didn't talk about Hunt Sabs on my canteen breaks
 9 because, again, I didn't know anything about them so
 10 I had no reason to talk about them until they had
 11 explained — as Employee H and Employee Q — until they
 12 had told me about them, I had no reason to talk about
 13 them in particular. In terms of the protestors, there
 14 was no real reason to talk about them. The only time we
 15 would talk about them is if they were along any of the
 16 site that could be — interfere with our work, we would
 17 let our colleagues know who would be around that area —
 18 who as in a protestor, not necessarily a name.
 19 Q. Okay. I just want to shoot forward to — you don't have
 20 to read it unless you don't believe I say it. In
 21 paragraph 82 it says:
 22 "... (John Curtin), alongside ... (Mel Broughton),
 23 seems to hold a leadership role amongst the protestors
 24 ... "
 25 So can you accept that you said that without — you

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1 can read it if you want because we're not in so much
 2 rush.
 3 " ... (John Curtin) [and] ... (Mel Broughton), seems
 4 to hold a leadership role ... "
 5 You've written that. I just want to talk about that
 6 in relation --
 7 A. I accept I made that statement.
 8 Q. What do you base that on? Is it from what you've seen
 9 or what you've heard or a collection of the two?
 10 A. The way you have communicated through a loudhailer has
 11 given me the influence that you are encouraging the
 12 protestors to shout abuse at us, driving into work --
 13 not necessarily telling them, but as your voice is above
 14 everybody else's, it's given me that impression of
 15 a leadership role.
 16 Q. Okay, so, we can -- yes, from what you've seen, you're
 17 sort of -- but it's your guesswork. It's what seems to
 18 be happening; yes?
 19 A. Yes, that's correct.
 20 Q. And one of the roles of leadership could be to inflame
 21 the situation; another role of leadership could be to
 22 calm down the situation. Did you ever witness me trying
 23 to calm down situations?
 24 A. Not that I remember.
 25 Q. Again, let's go to paragraph 24. Again, it's your fear

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1 of being targeted outside work. You, like every other
 2 witness -- would you say this is at the top of your list
 3 of fears, of being targeted?
 4 A. May I just refer back to my statement?
 5 Q. Yes. (Pause)
 6 A. I would say that being recognised outside of work from
 7 any evidence that had been put on social media was one
 8 of my fears, but also, nonetheless, with -- if there is
 9 ever a time I would have been with my family, safety
 10 concerns for my family if I was being targeted.
 11 Q. And --
 12 A. And -- sorry.
 13 Q. No, no, that was me interrupting. I'm sorry. You were
 14 saying about your family.
 15 A. Yes. For example, if I was out in public and -- for
 16 example, if I was in Huntingdon, close to where the site
 17 is, if I was recognised by any protestor with a family
 18 member, then I would be concerned if we were to be
 19 followed. I know that in -- sorry, colleagues had been
 20 targeted towards their home so that made me more
 21 cautious that something could happen to mine.
 22 Q. Yes, and you're aware of the controversial nature of
 23 MBR's work, aren't you? Let's just leave it at that for
 24 now. Had you realised by working in MBR -- it's
 25 controversial. Let's put it that way; yes?

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1 A. It is a controversial industry.
 2 Q. And so by being identified with this controversial place
 3 could put you at risk of being identified, not
 4 necessarily by another protestor, but by a member of the
 5 public, because protestors are members of -- my point to
 6 you is you could be arrested by -- you could be known if
 7 you were identified; you have a fear of being known by
 8 your neighbours, by the people in your local area. This
 9 is correct; yes?
 10 A. Yes, I do have the worry of being identified. However,
 11 this leads back to our -- well, the staff members being
 12 posted on social media. If any of us was recognised,
 13 then that would be an easy way to recognise us in public
 14 basically.
 15 Q. Yes. You worked at MBR before Camp Beagle; yes?
 16 A. Yes.
 17 Q. You were aware of the sensitive, controversial nature of
 18 the work before Camp Beagle? You were aware of
 19 potential public outrage about what MBR are doing before
 20 Camp Beagle?
 21 A. Yes, that's true.
 22 Q. Before Camp Beagle, did you take any moves whatsoever to
 23 see to it that your neighbours didn't know or no one
 24 knew -- apart from the people you chose to tell, did you
 25 take any moves whatsoever to take any precautions

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1 whatsoever to conceal the fact that you work at this
 2 controversial place? Was that -- was it routine for you
 3 to conceal your identity and the fact that you work at
 4 MBR prior to Camp Beagle?
 5 A. I would not disclose where I work. If anyone was to ask
 6 me, I would say that I'm a kennel assistant, not
 7 necessarily the place I'm working. I would be changing
 8 into different clothes -- well, changing into
 9 different -- sorry, changing into different clothes came
 10 after Camp Beagle. My apologies.
 11 Q. That's okay.
 12 A. However, yes, I would be more inclined not to mention
 13 anything to friends or neighbours or anything -- anyone
 14 for the matter of where I work. So, yes, I would be
 15 concealing my identity.
 16 Q. Which you just said which you did prior to Camp Beagle
 17 anyway? Think about it. It's a simple question.
 18 MR JUSTICE NICKLIN: Mr Curtin, don't --
 19 MR CURTIN: Sorry. You just answered the question. I may
 20 remind you. You've already said you didn't used to tell
 21 people your work. You've already said it. It's on the
 22 transcript. Before Camp Beagle, you were already not
 23 telling people because of the sensitive nature. Maybe
 24 some people would misunderstand you. For example, at
 25 a party, it would be routine for you to say, "I'm

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1 a kennel assistant" or "I work at Tesco's". That was
 2 before Camp Beagle; yes?
 3 MR JUSTICE NICKLIN: She didn't say "work at Tesco's".
 4 MR CURTIN: Sorry. I apologise.
 5 A. Before Camp Beagle I would say that I'm a kennel
 6 assistant but I won't say where I'm working so
 7 I wouldn't disclose what I do.
 8 Q. Thank you. That's my question answered.
 9 Paragraph 30:
 10 "I was often (but not always) driven by Employee Q,
 11 and I felt that their car was targeted a lot in
 12 comparison to cars driven by others."
 13 You haven't given evidence of why and it's just --
 14 is it fair to say it's just a feeling you had? You can
 15 have that feeling but it's not backed up by any
 16 evidence, is it, in this witness statement?
 17 A. Can I just refer back to my statement for this one?
 18 Q. The first sentence, paragraph 30.
 19 A. I've not given any evidence to say why we have been
 20 targeted.
 21 Q. Okay. At the end of there, you talk about an
 22 incident -- someone banging on the roof of the car,
 23 "threatened us". There's no more evidence about that in
 24 this witness statement. Did you report that to the
 25 police?

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1 MS BOLTON: There is.
 2 MR CURTIN: There is?
 3 MS BOLTON: Yes.
 4 MR CURTIN: Okay. I'll withdraw that. The reason I ask is
 5 because it's not in my evidence bundle. But you're not
 6 saying that I banged the car or I threatened you,
 7 are you? Simple question.
 8 A. I haven't mentioned that you've banged on my -- on the
 9 car we were travelling in.
 10 Q. Paragraph 34 [sic], you've said that -- being shouted at
 11 almost every day, and you finished it off:
 12 "The effect is particularly nerve-wracking."
 13 You talk about the "wall of sound".
 14 So shouting, going past -- and I understand why.
 15 Going past people who are shouting is nerve-wracking.
 16 I'm just --
 17 A. Yes, that's when we were driving to site.
 18 Q. You talk there, 36, about what the protestors shout.
 19 They shout "Murderer" and "Scum", you say "including
 20 myself". So there's an acknowledgement that generally
 21 you're not being targeted. Everyone gets shouted at,
 22 you could say. All the MBR workers get shouted at; yes?
 23 A. Can I just have a second, please?
 24 Q. That one is simple.
 25 MR JUSTICE NICKLIN: Mr Curtin.

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1 MR CURTIN: Sorry, I apologise. I'm just looking at the
 2 clock. (Pause)
 3 A. I haven't mentioned that everybody had been shouted at.
 4 Q. No, you haven't. Do you know any MBR worker that hasn't
 5 been shouted at?
 6 A. No.
 7 Q. Okay.
 8 MR JUSTICE NICKLIN: From your impression of the protests,
 9 is your impression that the protestors target their
 10 protest messages at everybody who is entering the Wyton
 11 site?
 12 A. Could you explain what you mean by "protest messages",
 13 please?
 14 MR JUSTICE NICKLIN: What they shout at you.
 15 A. Yes, I do believe that they have been calling them
 16 messages to everybody when entering the site.
 17 MR JUSTICE NICKLIN: Okay.
 18 MR CURTIN: If I may take you to paragraph 36, you're saying
 19 basically the things that protestors are shouting are
 20 the opposite to what goes on in the Wyton site, that the
 21 staff care for the animals; yes? I just want you to
 22 acknowledge you've read that, up to there, "... the
 23 staff care for the animals".
 24 A. Yes, the staff do care for animals, yes.
 25 Q. I am under a number of restrictions what I can and can't

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1 ask you, but I just put it in this way: I would ask,
 2 do you accept, for example, from -- we know that --
 3 well, there was a Daily Mirror article, for example.
 4 There's many other sources. Do you accept that there
 5 are people who absolutely disagree -- you may believe
 6 and we could talk about it all day. We're not going to
 7 be allowed to. My question is: do you understand that
 8 there are people in this country and round the world
 9 that would absolutely take issue with the fact that the
 10 MBR staff, any of you, look after animals? Do you
 11 understand that there are people who hold that opinion,
 12 genuinely held opinion?
 13 A. I understand that is a controversial industry.
 14 Q. Answer the question. It's a simple question. Do you
 15 understand that there are people -- not you. You're
 16 saying that the staff care for animals -- do you
 17 understand Joe Bloggs could come to a completely
 18 different conclusion on what's put in front of him and
 19 call you a liar, for example?
 20 MR JUSTICE NICKLIN: Well, Mr Curtin, that's not -- the
 21 question you want to ask --
 22 MR CURTIN: Could you help me?
 23 MR JUSTICE NICKLIN: Yes.
 24 Mr Curtin is suggesting to you that -- although he
 25 accepts what you say about your belief that you and the

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1 other staff care for the animals, Mr Curtin is asking
 2 you to accept that there are others who believe that,
 3 because the fate of some of those -- the animals that
 4 you care for is that they will -- they may ultimately
 5 lose their life , either as a result of clinical research
 6 or because they have given blood to an extent where they
 7 will not survive the procedure, that there are animals
 8 that will die as a result of their time at MBR Acres,
 9 which Mr Curtin is asking you to accept some people
 10 regard as the antithesis or the opposite of caring for
 11 animals.
 12 A. Yes, I do accept that there are people that do not agree
 13 with what happens with the company in that sense. Yes,
 14 I do accept that.
 15 MR CURTIN: Okay, good. I think that's as far as we can
 16 take that point of view. Yes.
 17 Again, paragraph 37, it talks of your -- making you
 18 uneasy about what the protestors would do to you in your
 19 car, but -- I can understand with all this shouting and
 20 in the past people have been around you, but has
 21 anything ever happened other than shouting to you in
 22 your car, like a physical attack, a smashed car window?
 23 Has anything ever happened to you apart from being
 24 shouted at whilst going in and out of the MBR site?
 25 A. There has been a time that my car has been targeted when

1 I've been leaving and something had been thrown at my
 2 car window.
 3 Q. Was this reported to the authorities?
 4 A. Yes.
 5 Q. To the police?
 6 A. Yes.
 7 Q. Did you have to appear in a court as a result? Were
 8 there any actions taken?
 9 A. I didn't have to appear in court, no, so no action had
 10 been taken.
 11 Q. Okay.
 12 MS BOLTON: If it assists Mr Curtin, because I don't know if
 13 it's missing from his bundle, if he looks at the exhibit
 14 at 1645 through to 1648 --
 15 MR CURTIN: (Inaudible).
 16 MS BOLTON: It's the police statement and the photographs.
 17 MR CURTIN: Okay. Well, my point was, then, so your car was
 18 banged, you made a report to the police and appropriate
 19 action was taken; yes? Action was taken?
 20 A. Yes.
 21 Q. Is that the only time that the police were involved? Is
 22 that the only specific incident, banging on the window?
 23 Is that it for the entire time?
 24 A. There was another incident when I was leaving site, that
 25 a protestor had banged on my car door.

1 Q. And you reported that to the police?
 2 A. I had taken a -- well, Employee H had recorded the
 3 footage so it had been recorded and given as evidence --
 4 Q. Basically my point to you is that, if things happened to
 5 you as you left that were outside of shouting, there was
 6 an avenue to report it to the security, report it to the
 7 police and action would be taken; is that correct? You
 8 had the -- you were able to report incidents, like
 9 banging on the car, and the police would then get
 10 involved if you chose to involve them. Once you'd
 11 reported to the police, there was a channel for you to
 12 take those complaints down; yes?
 13 A. Yes, if we wanted to take it to the police, we would.
 14 I did report these incidences to our security.
 15 Q. Okay. Right. We can now move on. Hopefully we can --
 16 it shouldn't take us too long now. Let's move on to the
 17 videos. For the sake of this video -- I am mentioned in
 18 this video and it talks of Mr Curtin and --
 19 MR JUSTICE NICKLIN: Okay, which paragraph, Mr Curtin?
 20 MR CURTIN: The entire incident, 61, 62, 63. Page 16 in my
 21 bundle. I just -- I don't require the video if the
 22 witness accepts this paraphrasing of it. You've
 23 identified me as being there. Me and the other
 24 protestor are leaving a narrow gap, forcing you to slow
 25 down, and this caused you some frustration. I'm

1 prepared to accept that I am there with the banner.
 2 Do you think there's anything more serious that I did
 3 than stand there and there was a small opening for
 4 which -- for you to drive your car or do you need to
 5 watch the video? Do you say anything beyond -- do you
 6 want to add anything beyond the fact that I was there,
 7 I was there with another protestor, and, as a result of
 8 where we were standing, you had to be careful? Is that
 9 an accurate description or would you accept that from
 10 me?
 11 A. Can I just have a second, please?
 12 Q. Yes. (Pause)
 13 A. The narrow gap was mainly a caution of safety.
 14 Would you mind if I see the video?
 15 Q. No. Let's go to 924.
 16 (Video played)
 17 Can we stop there? Can we stop the video there, as
 18 in can we display it on the screen?
 19 MR JUSTICE NICKLIN: Right, there we are. It's displayed.
 20 MR CURTIN: My Lord, can I -- in terms of time, words to the
 21 effect that I am minded to finish this witness --
 22 I think we'll be finished by half past at the latest.
 23 MR JUSTICE NICKLIN: Okay.
 24 MR CURTIN: Good.
 25 I invite you -- there's some figures on the

1 left —hand side, two police officers and someone else in
 2 an orange jacket. I ask you to accept that that person
 3 is me. Would you accept that? I'm saying it's me —
 4 would you agree? — talking to the police officers on
 5 the left —hand side.
 6 MS BOLTON: The witness can't see it at the moment.
 7 A. I cannot see the video.
 8 MR CURTIN: If it plays, can you see it?
 9 A. The video is loading. I can see the video.
 10 Q. Okay, can you see two police officers and a protestor —
 11 talking to a protestor?
 12 A. Yes.
 13 Q. Would you accept the person they're talking to is
 14 myself?
 15 A. Yes.
 16 Q. Good, okay. Play the video — ah, no, don't play the
 17 video. Stop there. I asked you before about, if there
 18 is any form of leadership, it's possible — I ask you to
 19 look at that scene there and think, "There's Mr Curtin
 20 talking to the police. It's within the realm of
 21 responsibility that Mr Curtin is talking to the police
 22 in terms of decreasing what may be otherwise a volatile
 23 situation". Can you accede to at least the possibility
 24 of that scenario?
 25 A. Could you rephrase the question, please?

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1 Q. Yes, I'm talking to the police before the gates open and
 2 I'm going to invite you to a bit at the end of the
 3 video, where I also talk to the police, that there's
 4 a reading to be had there that Mr Curtin, being one of
 5 the — I'll have to use the term "leader", but you put
 6 it — is seeking to decrease the energy, decrease the
 7 chance of illegal activities rather than someone who
 8 inflames a situation. So there's Mr Curtin talking to
 9 the police. I ask you to at least accede that there's
 10 a possibility that Mr Curtin is there to facilitate
 11 a peaceful protest. Is that within the realm of
 12 possibility from what you've seen so far?
 13 A. From that video I cannot tell what conversation is being
 14 had at the time.
 15 Q. Okay, let's —
 16 A. So ...
 17 Q. Shall we watch the video? Let's watch the video a bit
 18 further then. Is there any chance we can bounce it
 19 along?
 20 (Video played)
 21 MS BOLTON: 52 seconds.
 22 MR JUSTICE NICKLIN:
 23 MR CURTIN: It's 52 seconds long so let's watch the
 24 entirety.
 25 (Video played)

142

1 Stop the video there.
 2 You talk in your statement of "a narrow gap that
 3 myself and Amanda ... [as read]" — I ask you to suggest
 4 that the other person standing with the denim jacket
 5 holding a banner is Amanda. There is a gap and I would
 6 suggest it's a bit more of a narrow gap than what you
 7 said in your statement. Would you accept that?
 8 A. Yes.
 9 Q. Play.
 10 (Video played)
 11 Can we stop the video there?
 12 At the end did you notice the police officers go
 13 over and speak to myself?
 14 A. Yes.
 15 Q. Yes. Would you accept that at least on behalf of the
 16 police, it seems to be — the police offers on the
 17 ground seem to have accepted that they're not — they're
 18 certainly not arresting people as they slow the traffic
 19 down and there's one person who even stands in front of
 20 the car and he's not arrested by the police. The police
 21 are accepting this situation, that there's going to be
 22 some, let me call it, minor delay. Would you accept
 23 that?
 24 A. I accept that the police are guiding the traffic in
 25 slower, but they are doing that to make it safer. I

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1 won't say that it was safe for people to be walking
 2 around when cars are entering site.
 3 Q. Okay. Would you accept that the police officers
 4 available seem to — by the look of their body language
 5 and their mannerism, as far as they're concerned, the
 6 situation — it looks — it looks like — I'm
 7 offering — it's a supposition — to accept that the
 8 police seem to have it under control on their side.
 9 There's a relatively relaxed atmosphere. Despite the
 10 fact that even at one point someone comes and stands
 11 underneath, the police just deal with it and the
 12 situation is dealt with relatively quickly. Would you
 13 accept that?
 14 There are much more serious incidents in this case
 15 than this one. This was perhaps a typical daily scene,
 16 but the police are there, they take charge and a protest
 17 happens and the workers go in. Would you accept that
 18 scenario?
 19 A. I — sorry — I wouldn't accept that the situation was
 20 dealt with relatively quickly in the speed that the cars
 21 are going in slowly. It's rather of like I mentioned
 22 the safety, but also, yes, there are delays with the
 23 cars behind on the highway which can also cause
 24 potential safety issues there.
 25 Q. Yes.

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1 A. But the police do — the police are controlling the
 2 situation as much as they can so I do agree that the
 3 police are doing right by that.
 4 Q. Okay. Good. Let's move on to the next video. There's
 5 this video, another video and then we're virtually
 6 finished.
 7 8 September, let me ask you — because I don't
 8 challenge the fact that I'm in that video. The only
 9 reference to me — well, it did say, "They obstructed
 10 staff cars, including mine, as we exited [as read]".
 11 Would you accept that Mr Curtin was there? Would you
 12 accept in the next video, the one you've spoken of, the
 13 next incident was a typical type incident as well where,
 14 for sure, the cars are slowed down and there's
 15 protesting, but by then, by this time, I would ask you
 16 to accept there was a bit of a ritual going on. The
 17 police are present. Protesting. Mr Curtin says things
 18 in his megaphone and the situation is dealt with.
 19 Would you accept my reading of this video or do you need
 20 to see the video to come to another point of view?
 21 A. Could I see the video, please?
 22 Q. Surely. 267 — okay, 268.
 23 (Video played)
 24 Can we stop the video there? You can see the
 25 police. You can see the demonstrators. This is some

1 months into the protest. Is it too far-fetched to say
 2 that by now this has become something of a ritual? Cars
 3 come out, get shouted at, slightly blocked and then
 4 moving on? I would ask you to have that — would you
 5 accept there's a kind of a ritual that has been built up
 6 by this point?
 7 A. I wouldn't call it a "ritual"; more I would say in that
 8 scenario there it gives the impression that we would be
 9 faced by a number of protestors. I wouldn't call it
 10 a "ritual".
 11 Q. Just in the fact that you'd seen — it wasn't the first
 12 time. There's quite — there's like nearly maybe
 13 20 protestors. If it was your first time seeing this,
 14 it maybe would cause you — "I wonder what they're going
 15 to ..." — by now, you kind of knew what they were going
 16 to do. That's what I'm suggesting. You kind of know
 17 that there was going to be some shouting and some
 18 holding up of traffic. That's what I meant in terms of
 19 "ritual". You had a sense that you might know what
 20 happened. Do you know what I'm getting at? I'm just
 21 trying to make a non-controversial point. There was
 22 a kind of ritual, I would call it, though. Shall we
 23 watch the video?
 24 MR JUSTICE NICKLIN: Well, I think Mr Curtin is trying to
 25 put to you that, by this stage, September 2021, a sort

1 of routine had been established for cars leaving the
 2 Wyton site at the end of the day which, leaving aside
 3 the mega protest days, essentially look like this: the
 4 cars were delayed for a short time leaving the facility
 5 by, for a short period, people standing in the way,
 6 which slowed the vehicles down. That was then used as
 7 an opportunity for the protestors to shout whatever they
 8 wanted to at you. The police were present and
 9 eventually the cars moved off and typically it was in
 10 the order that we're watching. That's Mr Curtin's
 11 suggestion to you.
 12 A. Yes, I do agree with that.
 13 MR CURTIN: Okay. Let's watch the video.
 14 (Video played)
 15 Can we stop the video there? Just again to help
 16 with that — if I may call it "ritual", there was an
 17 opening of the waves then. Everybody — would you
 18 accept that everybody kind of — we've seen this before.
 19 We kind of roughly know — who knows, something
 20 unexpected could happen, but there's an expectation of
 21 what we're about to witness, especially with the
 22 protestors moving to one side, without being told to at
 23 this point by the police. Would you accept that that
 24 just happened? This kind of ritual is there; yes?
 25 A. I accept that some people may be moving, but this was

1 unpredictable, whether the police needed to move people
 2 out of the way or in the case that they may move out of
 3 the way.
 4 Q. Okay. What about we never know what individuals are
 5 going to do but we can go as far in terms of the ritual,
 6 apart from incident — there were isolated incidents,
 7 but on a day-to-day basis you could kind of predict what
 8 the main group was going to do. We haven't got anywhere
 9 in — very few incidents, if any, in the evidence of all
 10 the protestors blocking the vehicle. What we're talking
 11 about here is a ritual of most of the protestors and
 12 individual protestors may do individual actions but
 13 there's a group ritual going on. Can we have it as
 14 that — a herd, a group.
 15 These protestors seem to know that you're going to
 16 get out already and they're going to shout at you. I'm
 17 just trying — the reason I stopped the video is because
 18 everybody seemed to kind of move out of the way.
 19 There's one person there and that's the unpredictable
 20 one, but I'm just trying to — there's a group —
 21 a groupthink going on.
 22 A. That does generally seem to be the routine when we leave
 23 site.
 24 Q. Okay, let's play the video.
 25 (Video played)

1 Stop the video there. Can you see me in the video?
 2 There's a white car and can you see me? I'm actually
 3 standing -- you could say I'm standing in the road, in
 4 the way of the vehicle; yes?
 5 MR JUSTICE NICKLIN: Which are you? Are you --
 6 A. Yes.
 7 MR JUSTICE NICKLIN: There's a lady with -- is it blonde
 8 hair? Are you standing next to her?
 9 MR CURTIN: Yes, with the shiny bald head and the green --
 10 yes, on the second -- there's two women nearer to the
 11 car than I am, but there's a man standing a little bit
 12 back, about six foot away from the car, who is standing
 13 in the way of the car. That's how things stand at the
 14 minute; yes?
 15 A. Yes.
 16 Q. You could say I'm one of the ones that's made that car
 17 slow down; yes?
 18 A. Yes.
 19 Q. Play the video.

(Video played)

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1 MBR Beagles" banner? He was waving the vehicle on.
 2 Did you see that?
 3 A. I can see the placards around the car at the front.
 4 Q. Can we go back just a few seconds? I invite you to look
 5 at the man -- right now he has a "Free the Beagles"
 6 banner and he's standing near the bumper. He actually
 7 encourages the car to keep moving, if you watch.
 8 MR JUSTICE NICKLIN: Which side of the vehicle? The far
 9 side or --
 10 MR CURTIN: The driver's side of the vehicle, sorry. The
 11 man with the bald head, he's coming -- you watch his
 12 hands and he actually beckons the vehicle. That's
 13 Mel Broughton. That's a man called -- I don't know if
 14 you can accept -- that's a man called Mel Broughton,
 15 a bald-headed guy. He actually beckons the vehicle out
 16 to keep moving. Would you accept that he actually
 17 beckons the vehicle out?
 18 MR JUSTICE NICKLIN: Well, let's watch it.
 19 (Video played)
 20 MR CURTIN: Okay. In relation to that incident, in
 21 paragraph 66, you spoke about being nervous about there
 22 being a road accident, and I can understand that because
 23 your visibility is blocked; yes?
 24 A. Yes, that's correct.
 25 Q. And you felt very alarmed and invasive [sic], "because

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1 the protestors were so close to my car [as read]", which
 2 is your feeling and you're entitled to have it, but
 3 I just want to impress upon the court that to some
 4 degree you'd learned to be accustomed to that uneasy
 5 feeling by now, especially seeing as it wasn't normally
 6 followed by completely violent scenes. Maybe I'm saying
 7 that too much. Let me cut it down. You'd become
 8 accustomed by this time to people being near your
 9 vehicle; yes?
 10 A. I wouldn't say I'd become accustomed to it because it
 11 shouldn't result in where people are standing in the way
 12 for a driver to take that turning and not being able to
 13 see which direction they go in. I wouldn't say I'd be
 14 accustomed, but I'd say I'd be more cautious if that was
 15 to ever arise every time because you can't predict what
 16 the traffic are doing.
 17 Q. No, I am agreeing with you. I'm agreeing with you on
 18 the road traffic angle. It's more I'm drawing your
 19 attention to -- you felt alarmed and invasive [sic]
 20 because they were so close to your car. But this is
 21 months into the protest. There must be some degree
 22 where you had become accustomed to this kind of ritual.
 23 A. I would say, depending on the situation at the time,
 24 that we'd always be cautious.
 25 Q. Okay. Right, the last video -- let's see if you can

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1 accept this, unless you want to watch the video. There
 2 is a video and the only evidence -- not the only -- the
 3 evidence against me is that I was on the megaphone and
 4 that I was shouting things like, "Everything about this
 5 company is a disgrace"; "You're not wanted"; "The local
 6 community don't want you"; "Priti Patel doesn't want
 7 you". Before we watch the video, I'd ask you -- that's
 8 a video where Mr Curtin is involved in a very, very
 9 similar ritual to the last one and this time he's on his
 10 megaphone and he's not saying anything personal to you
 11 but he is making observations about animal -- the
 12 situation to do with animal experiments.
 13 So Mr Curtin, in this video, is protesting with
 14 a megaphone and partaking in one of those rituals. And
 15 then we don't have to watch the video, but if you want
 16 to watch the video, we can.
 17 MR JUSTICE NICKLIN: Would you clarify what the event was
 18 first of all?
 19 MR CURTIN: Pardon?
 20 MR JUSTICE NICKLIN: You haven't told us which is the
 21 incident you're referring to.
 22 MR CURTIN: I apologise. Paragraph 77, 16 September.
 23 MR JUSTICE NICKLIN: Right.
 24 MR CURTIN: I apologise.
 25 MR JUSTICE NICKLIN: So I think Mr Curtin is asking you --

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1 your relevant evidence about what he was doing is
 2 paragraphs 81 and 82, and Mr Curtin is suggesting that
 3 on this occasion his role was limited to his protest
 4 message via a loudhailer and, in 82, you suggest that he
 5 seemed to have a sort of leadership role. Mr Curtin's
 6 initial question is, before looking at the video,
 7 would you accept that that's what -- you are essentially
 8 identifying him in that role in relation to this protest
 9 event?
 10 A. Yes.
 11 MR CURTIN: Good. Then we don't have to watch ...
 12 MR JUSTICE NICKLIN: That's fine.
 13 MR CURTIN: Point number 82, I've touched upon it before but
 14 you've alluded to some leadership role which I don't
 15 dispute. But your reading of it -- if I can just read
 16 the paragraph out:
 17 " ... (John Curtin), alongside ... (Mel Broughton),
 18 seems to hold a leadership role amongst the protestors
 19 and often encourages other protestors by shouting
 20 through a loudhailer and generally increasing the
 21 intensity of the protests."
 22 I want to put it to you that Mr Curtin certainly is
 23 there as some sort of loud, prominent protestor, but I'm
 24 asking you to accept that one of those roles that I hold
 25 was to actually decrease the intensity in terms of it

1 becoming illegal, people kicking cars and banging on the
 2 cars. Mr Curtin's role, one of a leadership, was to
 3 facilitate that ritual which involved cars being slowed
 4 up, lots of shouting. Would you accept that that's
 5 another reading of "leadership", not only to increase
 6 but also to decrease?
 7 A. Well, I have got no evidence to say that -- I didn't
 8 know what you was talking to the police about so
 9 I cannot say that you had asked ...
 10 Q. Yes, and you're also at the same time -- you can also --
 11 you're not able to say that I was increasing the
 12 intensity -- you don't know which way, do you,
 13 increasing or decreasing? Let's just leave it at that,
 14 shall we?
 15 A. Yes, I'm not sure if you was asking to -- yes, that's
 16 correct.
 17 Q. Okay. Paragraph 101, you talk about the idea of not
 18 going in convoy anymore and one of the reasons:
 19 " ... that we weren't 'putting on a show' for the
 20 protestors by coming in as a group ..."
 21 Yes? Paragraph 101:
 22 "I believe the reasoning behind this was so that we
 23 weren't 'putting on a show' ..."
 24 A. Yes, that's correct.
 25 Q. So as well as security issues, there's some sort of,

1 I don't know, political reason for it, if I may put it
 2 that way, you know. The company wanted to make some
 3 sort of statement, so it wasn't just a pure security --
 4 I'm asking you to accept that it wasn't just based on
 5 pure security; that it was -- as you put yourself, you
 6 didn't want to put on a show. There was political
 7 reasons how the company wanted to look, according to
 8 this paragraph -- no? -- or have you got another meaning
 9 what you meant by, "We're not going to have the convoy
 10 because we don't want to put on a show anymore"? Do you
 11 understand my question?
 12 A. Yes. I understand your question. I don't think it was
 13 a political reason, as you say. It was a decision
 14 through a meeting that had been discussed that we
 15 stopped going in convoy, so this was purely management's
 16 choice.
 17 Q. Okay. And paragraphs 103 and 104 basically talk about
 18 the injunction made a difference but it wasn't long
 19 before -- you sort of allude to the fact that it wasn't
 20 long before the demonstrators began to ignore it and
 21 there were problems -- problems came soon afterwards.
 22 I put it to you that the injunction did make a massive
 23 difference and there may be isolated incidents that
 24 happened after the injunction was granted. Would that
 25 be fair?

1 A. Can I just have a second?
 2 Q. Yes. (Pause)
 3 A. I'd say from when the injunction came in, leaving the
 4 entrance, so leaving onto a highway, there were
 5 incidences that happened outside.
 6 Q. Yes, but the daily ritual --
 7 MS BOLTON: Sorry, can you let her finish?
 8 MR CURTIN: The daily slow -- sorry.
 9 A. Yes, so the entrance gate, there wasn't protestors
 10 outside that bit, but more or less along the road side
 11 that we had the problem with.
 12 Q. Okay. We're getting there. 131, the first sentence:
 13 "I was cautious that people might be following me."
 14 Yes? Do you read that?
 15 A. Yes.
 16 Q. My question would be: you may have had concerns, but to
 17 your knowledge no one ever has followed you?
 18 A. Not that I'm aware of, no.
 19 Q. On 132 -- it's a very simple point -- you state that on
 20 day the dog vans went out, the emotions would be higher.
 21 How have you put it?
 22 " ... there tended to be more anger ..."
 23 A. Yes, that's correct.
 24 Q. Did you understand that process? Could you understand
 25 why there would be more anger on those days? Can I put

1 it like this -- yes, could you understand -- could it be
 2 justified amongst the protestors that there was more
 3 anger on that day when the puppies went out? Could you
 4 have any understanding of it?
 5 A. I do understand.
 6 Q. You do? Is that what she said, "Yes, I do"? Did she
 7 say "I do"?
 8 MR JUSTICE NICKLIN: Yes.
 9 MR CURTIN: Okay, thank you.
 10 We touched on it before, but paragraph 136, the
 11 second sentence:
 12 "If a protestor recognised me, I would be worried
 13 that I and those ... would be targeted by being
 14 approached, confronted, threatened or harmed by the
 15 protestors, or that my vehicle would be damaged ..."
 16 Yes?
 17 A. Yes.
 18 Q. Then I said to you about the Daily Mirror article and in
 19 fact you used to hide your identity, conceal your
 20 identity, before there were ever any protests. So
 21 would it be fair to say this is a general fear that, "If
 22 I get identified as working for that notorious place,
 23 anyone might have a go at me on the street, for example,
 24 or if a neighbour found out"? It's a generic fear of,
 25 "If someone knows I work for MBR, I might be in trouble

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1 from someone with strong beliefs and that could be
 2 anybody"?
 3 A. I would only say that people from social media who may
 4 have seen our licence plates are more likely to target
 5 us than general public.
 6 Q. Okay. Point number 138, you say you're the ...
 7 "I have had a picture of myself posted on social
 8 media by the protestors. I am the cover photo of the
 9 Free the MBR Beagles Facebook page ..."
 10 Could you expand on that because I'm not sure what
 11 you mean.
 12 A. On social media, the timeline cover photo has a photo of
 13 me pushing the trolley.
 14 Q. And ...?
 15 A. The image I'm not so happy with because it shows my face
 16 rather than that part being censored, so anyone who
 17 visits the page and recognises the photo, you've just
 18 revealed my identity.
 19 Q. Could you repeat that last bit of the sentence, please?
 20 A. Anyone who visits Free the MBR Beagles and sees the
 21 cover photo could recognise me out in public.
 22 Q. Are you aware -- I haven't got -- could you show me
 23 that?
 24 MS BOLTON: 781.
 25 MR CURTIN: 781.

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1 MS BOLTON: My Lord, it's page 1648 in ...
 2 MR JUSTICE NICKLIN: I've got it.
 3 MR CURTIN: Ah. I'm not belittling it, but has anyone ever
 4 identified you off the Free the MBR Beagles?
 5 A. My colleagues had.
 6 Q. Pardon?
 7 A. My colleagues had --
 8 Q. A colleague, but it's quite a grainy picture. Yes, it's
 9 not a clear -- that is not an attempt to out you,
 10 I would say. It's a picture of an image of the dogs.
 11 Do you see that as a personal attack against you,
 12 that picture, the Free the MBR Beagles one?
 13 A. If the photo was more discreet, I'd still say part of it
 14 is targeting the staff because there are other ways to
 15 take photos than having members of the staff in the
 16 photos, so I don't feel that it was necessary.
 17 Q. Okay. But, as we've agreed before, on Camp Beagle,
 18 there's not like a rogues gallery -- you've never
 19 appeared in a rogues gallery on Camp Beagle's site of,
 20 "This is one of the puppy killers. Can you tell us what
 21 you know about her", for example? You haven't been
 22 targeted -- you may have appeared in other individuals'
 23 accounts, I'm not sure, but I'm talking about on the
 24 Camp Beagle social media, you nor any other employee has
 25 been targeted? That would be correct, would it?

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1 A. Could I have a minute, please?
 2 Q. Yes. (Pause)
 3 A. I have not been targeting from that cover photo.
 4 However, I do know that there has been colleagues that
 5 have been targeted at their home. We've had ...
 6 Q. But have you ever seen anything on Camp Beagle's social
 7 media that promotes following people, targeting workers
 8 at their houses -- in fact targeting them in any
 9 personal mention? It's not in your witness statement.
 10 I ask you now, have you got -- I put it to you that you
 11 haven't seen it because it's targeting --
 12 A. I've not seen --
 13 Q. Yes, go on.
 14 A. I have not seen any promotion to target on social media.
 15 Q. Okay, thank you. Paragraph 142, you talk of you don't
 16 go into Huntingdon yourself, being frightened that you
 17 might be recognised or approached by a protestor.
 18 Are you aware of an incident -- I think there was one
 19 incident where that did actually happen to somebody and
 20 they were recognised by a protestor. Are you aware of
 21 that?
 22 A. Yes.
 23 Q. It happened once and once alone?
 24 A. Directly in public it happened once.
 25 Q. Okay. I'm going through chronologically. I just wanted

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1 to confirm -- paragraph 145 -- that prior to
 2 Camp Beagle, when somebody asked you where you work, the
 3 answer would be some sort of generic answer, "kennel
 4 assistant", with the idea of actually not saying,
 5 "I work for MBR Acres, the place that breeds puppies for
 6 experiments". Prior to Camp Beagle you were already --
 7 as we've already agreed on the transcript -- attempting
 8 to not broadcast to the world where you work; correct?
 9 A. That's correct that I would not post where I work.
 10 Q. A bit of a generic statement again. 146 --
 11 paragraph 146:
 12 "The protests affected all of the staff in terms of
 13 the group spirit and morale."
 14 That's a bit of a catch--all sentence but I can
 15 imagine it did, you know. There you've got people
 16 outside your gates every day calling you "Puppy killers"
 17 and -- yes, it's going to affect your morale, but do you
 18 accept the rights of those protestors to be outside
 19 those gates and to be protesting in a way that you're
 20 not -- that you wouldn't choose for them to do? Those
 21 protestors are protesting, they're loud and they're
 22 passionate and after God knows how long it's going to
 23 get you down as a worker, but do you understand the
 24 legitimate right of protest that they had to make those
 25 protests?

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1 A. I understand the right to protest. However, I don't
 2 agree with the right or any right to shout abuse at
 3 staff.
 4 Q. I would put to you it's legitimate to shout at the staff
 5 "Puppy killers". It's my case. It's going to get you
 6 down as a worker but it's legitimate, I would say. What
 7 do you say to that?
 8 A. The abuse that was shouted at the staff did put the
 9 morale down.
 10 Q. Okay.
 11 MR JUSTICE NICKLIN: Could you just -- Mr Curtin was quite
 12 specific about the allegation of being a puppy killer.
 13 He asked you to comment on that specifically.
 14 A. In terms of the impact the word "Puppy killer" had on
 15 me?
 16 MR JUSTICE NICKLIN: I think his question more is: do you
 17 accept, from Mr Curtin's point of view, that's
 18 expressing his protest message?
 19 A. I don't agree with the name that's been called towards
 20 us. However, if -- there are different ways to protest
 21 rather than shouting those messages towards us.
 22 MR CURTIN: Okay. If I can draw -- we're on paragraph 146
 23 already and I'd particularly like you to read the
 24 next -- where it starts:
 25 "This is partly because of the fear of being

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1 followed, [alarmed], harassed [and distressed] and
 2 targeted at home ..."
 3 Please read the following four lines of
 4 paragraph 146. Tell me when you've finished.
 5 A. So I've finished reading paragraph 146.
 6 Q. Okay. We've already touched upon it and time is of the
 7 essence now, but I'm not hurrying -- I'm hurrying myself
 8 really. Do you understand -- for example, you've got
 9 some awareness of me. Do you realise that if I was
 10 given free rein to ask you any questions I want, me and
 11 you could be here for one week discussing these four
 12 lines? Are you aware that I would utterly argue with
 13 every single word you've written there? Not that -- you
 14 don't have to agree with what I've said, but I would
 15 take exception to your description. Do you understand
 16 that?
 17 A. Yes, I understand.
 18 Q. I think we may be able to deal with it as simply as
 19 that.
 20 I would love to go on more but I don't think I will,
 21 as long as you accept that not only me but many, many,
 22 many other people who would be opposed to the work that
 23 you carry out could take exception to your view of your
 24 job, in terms of it being compassionate -- that's the
 25 word you use. And many people would take exception to

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1 the fact that MBR workers care for the dogs, that MBR
 2 workers are not involved in immoral activities. I'm not
 3 asking you to agree or disagree. I'm just asking you to
 4 accept there are people -- I am one of them -- we're
 5 talking people in the -- there are millions of people in
 6 Britain that would argue with your statement. Are you
 7 aware that that is the case? That's all. Just so we
 8 don't have to debate the particulars, are you aware that
 9 there are millions of people in Britain that would take
 10 exception to those -- the last four lines of that
 11 paragraph?
 12 A. I do agree that some people would -- well, in your
 13 words, millions of people would disagree with that, but
 14 what the message -- what I'm saying is that the staff,
 15 if we didn't care for the welfare of the animals, we
 16 wouldn't be working there.
 17 Q. Again --
 18 A. In terms of the care --
 19 MR JUSTICE NICKLIN: Okay, Mr Curtin, the two of you are not
 20 going to agree about this and it's not a matter of
 21 importance and it's not something I'm going to -- I'm
 22 not going to say in the judgment I give which of you is
 23 right -- okay? -- so it's not relevant.
 24 MR CURTIN: I just need to add a saying because she made
 25 a further statement.

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1 MR JUSTICE NICKLIN: When you look back at the transcript,
 2 you'll realise that you got the answer you need.
 3 MR CURTIN: Yes.
 4 I do believe we're nearly finished. Bear with me
 5 now for --- I think we'll be there in about two or three
 6 minutes.
 7 Paragraph 147, you talk of, despite the injunction,
 8 there still being problems, which there may or may have
 9 not been, but there's always that --- there's such
 10 a thing as the police force, isn't there, the Cambridge
 11 police force, and I put it to you, like every other
 12 employee of any company, no matter how controversial ---
 13 people who work in slaughter houses in terms of the
 14 animal world, that's controversial; people who work in
 15 abortion clinics --- but things are going to happen in
 16 the world and there is a road to go down which involves
 17 informing the authorities; is that correct? And that's
 18 what happened after the injunction. After the
 19 injunction there were isolated incidences of which
 20 people could ring the police and go through the normal
 21 channels and it would be dealt with appropriately.
 22 Would you accept that?
 23 A. I accept that the police did take responsibility with
 24 guiding the traffic.
 25 Q. Okay. Going further on --- sorry, did I interrupt?

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1 A. Oh, no. No, you haven't interrupted.
 2 Q. Okay. In the middle of that paragraph:
 3 "It was very intimidating and made me scared. I had
 4 constant feelings of fear, dread and anxiety that
 5 protestors might do something to alarm or intimidate us
 6 further."
 7 I put it to you that that's a common theme here.
 8 I'm not disputing that you have some anxiety about
 9 people shouting and protesting and being near your car,
 10 but forever there's this fear --- and it's a legitimate
 11 fear, but it's just that. It's a fear based on your
 12 feelings, but it's a fear. That's right, isn't it?
 13 That's what you've got, "I had constant feelings of
 14 fear" of something the protestors might do?
 15 A. Yes, that's correct.
 16 Q. You've said it's designed to --- you said about the
 17 protest:
 18 "I do not consider it to be a peaceful protest. It
 19 is designed to harass us to leave our jobs ..."
 20 Is that your belief?
 21 A. In a way that the abuse was shouted and aimed towards
 22 us, I believe it did push people to leave their job.
 23 Q. Would you accept that people have got a legitimate right
 24 to shout in a protest at you, as one of the workers, and
 25 a person who is protesting about animal experiments has

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1 a right to shout at you --- not make threats --- to shout
 2 at you?
 3 A. I wouldn't say directly towards me, no.
 4 Q. Okay. It's just that the last sentence of that
 5 paragraph:
 6 "I feel like my human right of being allowed to come
 7 to work peacefully to perform a job has been forgotten
 8 about, and the protestors' rights trump mine."
 9 This is your opinion which you're entitled to; yes?
 10 A. Yes.
 11 Q. Do you feel let down by the police?
 12 A. No. No, I don't feel let down.
 13 Q. Well, you said "the protestors' rights trump", so what's
 14 the problem? The protestors protested, you went in and
 15 out of work. What was so bad? How did you lose out
 16 compared to the protestors --- the protestors that
 17 trumped you? You drove into work every day that you
 18 needed to. The protestors protested. You're not
 19 disappointed with the police. What is the problem then?
 20 What do you mean by "... the protestors' ... trump
 21 mine"? Who has let you down then?
 22 A. It's the way that --- the intensity of the protestors
 23 were shouting abuse towards us was making it almost ---
 24 well, it was draining to go through that every day.
 25 I don't think the police let us down in any way.

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1 I believe they did everything they could to guide us
 2 into the entrance safely. However, it was just the
 3 impact that left driving in to MBR and out of MBR. That
 4 was the draining part and that's --- that wasn't
 5 acceptable.
 6 Q. Yes, I understand that. So would it be fair to say that
 7 one of the elements that led to your stress --- and it's
 8 perfectly understandable --- was that this wasn't
 9 a one-off protest, this was happening every day? It's
 10 that everyday element of protesting that --- it was one
 11 of the heavy factors on you and your stress. It wasn't
 12 just a one-off like most protests. This was every day.
 13 Did that play a large factor in your anxiety and stress,
 14 that it was relentless, it was every day?
 15 A. It was one of the factors that did get me down when
 16 coming into work. However, because of the constant
 17 abuse and what we were facing each day, we did have
 18 shortages of staff. That was another factor that was
 19 hard.
 20 Q. Okay.
 21 A. And also the impact it left whilst going through that
 22 every day, coming home to family, it did put stress into
 23 my relationship.
 24 Q. Yes. But we've established that people do --- that you
 25 can understand the right to protest?

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1 MR JUSTICE NICKLIN: Okay, Mr Curtin, you've got that.
 2 MR CURTIN: Good. Just one bit on 151. I just wanted to
 3 ask you what -- it's not as important as the evidence,
 4 I think. 151, you said:
 5 "I would still want to go back to MBR and help them
 6 in the future ..."
 7 A. Yes, I would still go back to work for them and help
 8 them in the future. My work was perfectly legal. I did
 9 take compassion into my work, but whilst going through
 10 that every day, driving through, that did cause an
 11 impact in my mental health at the time.
 12 Q. Now, I keep saying we're nearly finished but we really
 13 nearly are. I think I've got perhaps one more point
 14 after this. You left the job and you talked about
 15 affecting your mental health. The nature of the work
 16 you did, it being controversial, most people having
 17 a very different opinion to you -- some people -- many
 18 people having a different opinion to you, I put it to
 19 you that the reason you left work, there were other
 20 factors involved other than the actions of the
 21 protestors; for example, the difficult nature of the
 22 work, the smell, the noise, the emotions involved in
 23 working with those dogs -- there were other factors
 24 involved or is it your case that you left because of the
 25 protest?

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1 A. The protestors were one of the reasons that was
 2 influencing me to leave. However, my family were also
 3 concerned for my safety, if I'm being out in public.
 4 I wouldn't say the points you've given about the
 5 environment caused me to leave, but, rather, the small
 6 things such as the abuse every day, the shortages of
 7 staff, my mental health coming home to my family, the
 8 thought of being followed when leaving work and
 9 concealing identity and having the abuse every day.
 10 Small -- them factors were what led up to this decision,
 11 but it was not just the decision overnight. This was
 12 thought about and I see how long I -- I thought about
 13 how long I could stay, so it wasn't just a quick
 14 decision.
 15 Q. Okay. But let's get one thing clear before I finish,
 16 that just this simple act of being -- protestors being
 17 outside there every day, shouting "Puppy killer", "Shame
 18 on you" -- every single day there have been stories
 19 about your workplace on the social media. Now and then
 20 there have been national headlines. That in itself is
 21 going to cause stress and anxiety, isn't it, being
 22 embroiled in --
 23 A. Yes.
 24 Q. Okay. Are you in any -- I've already gathered from
 25 other witnesses that indeed some of the dogs from MBR go

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1 to medical research, but there are other forms of
 2 research carried out under project licences that the MBR
 3 dogs get sent to. That's correct, isn't it? It's not
 4 just medical research. That's the case -- is that the
 5 case from your understanding, that dogs do get used for
 6 medical research from MBR but there are other uses as
 7 well; is that correct?
 8 A. Can I just have a second?
 9 Q. Do you need a second?
 10 A. Sorry, I'm just thinking back to what you said.
 11 I am not sure about the other uses that dogs from
 12 MBR go to, but I understand the animals are used for
 13 medical research.
 14 Q. Okay. Like you said, you don't know. You don't know
 15 for sure.
 16 Right. Last question. It's your only mention of
 17 the drone.
 18 MR JUSTICE NICKLIN: Well, there's another section in the
 19 witness statement which you don't have.
 20 MR CURTIN: Okay. Right. This is my last question about
 21 the drone. What's your problem with the use of the
 22 drone in this case against me? I'm a named defendant.
 23 There's a witness statement from you. As part of that
 24 witness statement it mentions just the use of the drone
 25 as a problem. Could you tell me about what that --

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1 could you say -- tell me what that is in relation to --
 2 yes. Answer the question, please. What's the problem
 3 with the use of the drone?
 4 A. The drone would be following us around whenever we
 5 carried out tasks outside and -- whilst recording.
 6 I don't think it was fully acceptable because it not
 7 only distracted us but also it did intimidate us to the
 8 point that we did have to stop because we were trying to
 9 conceal our identities at the same time.
 10 Q. Stop what? When you said "to stop", are you telling
 11 me --
 12 A. Stop the task.
 13 Q. -- there's incidences where -- and I'd like you -- if
 14 there is, you need to tell me about them -- incidences
 15 at work where you were actually prevented from, say,
 16 sending dogs off to a lab, doing your jobs inside the
 17 sheds? Is there incidences of work being prevented from
 18 the use of the drone, if that's what you're saying?
 19 I can understand you're saying you didn't like to be
 20 watched, but what about actually preventing you from
 21 carrying out your duties? Are you aware of a single
 22 incident where that's actually the case?
 23 A. Can I just refer back to my statement, please?
 24 Q. Yes. It's a very --
 25 MR JUSTICE NICKLIN: In this instance you'll have to do it

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1 from memory. Are you saying that you can recall of
 2 incidents that the use of the drone prevented you from
 3 going about your work?
 4 A. I know when we were moving the dogs around site that
 5 sometimes it did prevent us from moving them or when
 6 I've been carrying out tasks around the buildings we
 7 have had to stop. However, it came to a decision that
 8 we would continue, but to conceal our identities more so
 9 that the work could be done because it was necessary.
 10 MR JUSTICE NICKLIN: Right.
 11 MR CURTIN: Can I ask one more question to clarify this
 12 position? It's a bit vague. It's not a new subject
 13 because I want to sit down but I just want to -- it's my
 14 last question.
 15 So just to go over that because it's important.
 16 This is in my witness statement, it's against me, it's
 17 my case that I fly the drone and you're now saying there
 18 was an incident where you were actually stopped -- you
 19 haven't said why you were stopped, just because of the
 20 fact that people would see you, unless you need to hide
 21 something. But the fact you were going to see something
 22 and it was visible -- so you were stopped and then you
 23 decided, "No, it's not going to stop us. We're just not
 24 going to conceal our identity [sic]". Did it stop
 25 you -- was the moving of one -- you talked about the

1 dogs being moved from one place to the other. Did those
 2 dogs get moved from shed A to shed B whether the drone
 3 was there or not?
 4 A. Yes.
 5 MR CURTIN: Thank you. That's all my questions.
 6 MS BOLTON: No re-examination, my Lord.
 7 MR JUSTICE NICKLIN: Right. Thank you very much for giving
 8 your evidence to us, Employee J. You'll understand why
 9 I'm not using your name and no discourtesy intended to
 10 you for that. That completes your evidence. Thank you
 11 very much.
 12 A. Thank you.
 13 MR JUSTICE NICKLIN: Right. Can we close the link?
 14 It's late so I only want to deal with these briefly .
 15 That last witness has given me real concerns about what
 16 is going on on the videolink. There have been unnatural
 17 breaks in the evidence where the witness is saying "Can
 18 I think about that?", which, in court, it would be
 19 immediately apparent to me what was going on, and it's
 20 not apparent to me what's going on and I'm concerned
 21 about it because they are unnatural breaks and they
 22 won't appear on the transcript unless they put "(Pause)"
 23 in it. I'm concerned about them. The very first thing
 24 that we're going to change is we're not going to have
 25 LiveNote at the remote location. I'm very concerned

1 that the witness is looking back at material or is
 2 otherwise being distracted in relation to giving
 3 evidence.
 4 MS BOLTON: My Lord, just to clarify, I don't think that was
 5 the cause. I think this is a very nervous witness --
 6 I think that's all it was --
 7 MR JUSTICE NICKLIN: Okay.
 8 MS BOLTON: -- who was very much struggling.
 9 MR JUSTICE NICKLIN: Okay. Then also I need a witness
 10 statement confirming who is in the room for each of
 11 these --
 12 MS BOLTON: Yes.
 13 MR JUSTICE NICKLIN: I'm not suggesting there's anything
 14 untoward happening. It's just -- for the sake of good
 15 order, I just want to make sure that we've -- that I am
 16 satisfied that there's nothing -- I mean, for example,
 17 confirming who is present in the room. I'm assuming
 18 there is only a solicitor present.
 19 MS BOLTON: That's correct, my Lord. And, my Lord, you will
 20 note that for the other two witnesses there wasn't those
 21 breaks. As I say, I think we were dealing with a very
 22 nervous witness.
 23 MR JUSTICE NICKLIN: All right. Then it may be that my
 24 concerns will be allayed as we go forward because the
 25 alternative to videolink evidence is that I say that we

1 have a witness comes and the witness will be screened.
 2 MS BOLTON: Yes.
 3 MR JUSTICE NICKLIN: At least then I can see what's going
 4 on. This is the first time I've dealt with a witness in
 5 these unusual circumstances and it's been particularly
 6 disconcerting this afternoon because I cannot see what's
 7 going on.
 8 MS BOLTON: As you can see from the evidence, it's an
 9 employee who doesn't work for the company anymore and,
 10 as I say, I believe this was a struggle.
 11 MR JUSTICE NICKLIN: All right. You'll understand why I'm
 12 concerned about it because in court I can see what the
 13 witness is doing and it's all about body language and
 14 understanding that sometimes you can actively see --
 15 it's almost -- it's facetious to say that it's
 16 cartoon-like, but some witnesses you can visibly see
 17 they're thinking about the answer and that then means,
 18 "Okay, that's fine". But, you know, there could be
 19 a whole host of other reasons why the witness is
 20 pausing, some of which are not acceptable. But I've no
 21 idea what's going on. That's the problem.
 22 Right. We'll move forward. Remove the LiveNote.
 23 MS BOLTON: Yes.
 24 MR JUSTICE NICKLIN: We'll see how we go. We're being too
 25 ambitious in the number of witnesses in a day. I think

1 you've got -- I think there are very limited prospects
 2 of you getting through two witnesses tomorrow so I would
 3 stand down the second witness. We will just do
 4 Mr Demetris Markou, unless there's a real problem with
 5 the other employee, in which case you can rejig them.
 6 I think we're going to have to have a maximum of two --
 7 unless you have nailed down with Mr Curtin the extent to
 8 which he wants to cross-examine the witness, I think we
 9 can set a limit for two witnesses a day.
 10 MS BOLTON: Yes, I think we are ready to rejig the
 11 timetable, my Lord. I just flag I'm a bit concerned we
 12 are going to run out of time because we have got quite
 13 a lot to get through.
 14 MR JUSTICE NICKLIN: Well, we will curtail the persons
 15 unknown elements of the -- those are the bits that will
 16 be concertina'd.
 17 MS BOLTON: My Lord.
 18 Ah, yes, we do of course -- I'm just being reminded
 19 we have two days back because Ms Jaffray is settling --
 20 MR JUSTICE NICKLIN: Yes.
 21 MS BOLTON: -- so we should be --
 22 MR JUSTICE NICKLIN: That's fine. I'm not criticising
 23 Mr Curtin. He's doing a monumental task on his own and
 24 he is -- in respect of the questions he's asking,
 25 obviously some of them could be phrased differently, but

1 he is doing exceptionally well for somebody who doesn't
 2 have legal training and I don't want to overburden him.
 3 I suspect he'll find the process of cross-examining
 4 repeated witnesses over several days of trial exhausting
 5 and he has to prepare each night for the next witness.
 6 So we're going to recalibrate what demands are
 7 pressed -- are put on him, so we'll do a maximum of two
 8 witnesses a day unless you agree that Mr Curtin only has
 9 a couple of questions for one particular witness.
 10 MS BOLTON: My Lord, I entirely accept that and I can just
 11 see --
 12 MR JUSTICE NICKLIN: Equally I'm not criticising you. This
 13 is just how we learn in the trial process what's working
 14 and what isn't.
 15 MS BOLTON: Indeed.
 16 MR JUSTICE NICKLIN: Two other points quickly. I think it's
 17 important -- Ms Pressick mentioned that they do have
 18 exit interviews. I'm minded to make an order that you
 19 disclose disclosure relating to the exit interviews that
 20 have been conducted so that we can see what reasons are
 21 being given why people have left. You can redact the
 22 employee's name and replace it with a cipher or, if
 23 there's an employee who has not previously given
 24 evidence in the case, you can redact the name entirely.
 25 I'm not interested in who they are. I'm only interested

1 in why they've left.
 2 MS BOLTON: My Lord, indeed. I think there's only a -- for
 3 instance, the employee who has just given evidence, hers
 4 was provided.
 5 MR JUSTICE NICKLIN: Yes. Well, she's provided an email --
 6 MS BOLTON: Yes.
 7 MR JUSTICE NICKLIN: -- but that won't be -- that's not the
 8 exit interview.
 9 MS BOLTON: I don't know what the detail is on the exit
 10 interview, my Lord.
 11 MR JUSTICE NICKLIN: I suspect from the basis -- I'll look
 12 back at the transcript, but my understanding will be
 13 that documents will have been generated by that process
 14 and I think it's important to get a scale and a proper
 15 appreciation of the reasons why people have been
 16 leaving.
 17 MS BOLTON: My Lord.
 18 MR JUSTICE NICKLIN: Finally, police evidence.
 19 Superintendent Sissons, do you want -- I mean, I could
 20 take up -- it was my initiation originally to obtain his
 21 evidence. If you want, I can set in train the process
 22 of asking him to provide an updated statement.
 23 MS BOLTON: We've provided the transcript with the court
 24 directing it. We are waiting to hear whether we need to
 25 ask for anything more from the court.

1 MR JUSTICE NICKLIN: Okay.
 2 MS BOLTON: I don't know what the answer to that is yet, but
 3 we should have it shortly.
 4 MR CURTIN: I would support the -- I would ask for
 5 a policeman -- a senior policeman to give evidence in
 6 this case.
 7 MR JUSTICE NICKLIN: No, no, no, no, no.
 8 MR CURTIN: No? okay.
 9 MR JUSTICE NICKLIN: What would you want to ask him?
 10 MR CURTIN: The position on the ground prior to the
 11 injunction, there were police available at the time;
 12 "You acted as you did and there was no moral panic";
 13 "The police were in control. There were police officers
 14 there all the time and the police had the situation
 15 under ..." --
 16 MR JUSTICE NICKLIN: Well, remember he gave a statement.
 17 MR CURTIN: Yes.
 18 MR JUSTICE NICKLIN: Well, he largely -- most of what you
 19 said there he covered so none of that is anything that
 20 you would need to elucidate.
 21 MR CURTIN: And to perhaps cross-examine him because I --
 22 about my role.
 23 MR JUSTICE NICKLIN: Okay, I've put you on the spot, perhaps
 24 unfairly, at the end of a long day. You think about it.
 25 Write down why you say an officer should be required to

1 attend because it's not usual and I wouldn't ordinarily
 2 expect to utilise police resources by requiring a very
 3 senior officer to come to court unless there's a very
 4 good reason why the evidence he's given in writing needs
 5 to be further clarified or elucidated, because, unless
 6 there's a very good reason why he has to come and answer
 7 further questions, I don't want to be responsible for
 8 requiring a very senior officer to come when no doubt
 9 he's got other important duties to attend to. So it's
 10 essentially you or Ms Bolton needs to persuade me why it
 11 is the officer should be required to come here to answer
 12 further questions; all right? So you think about it.

13 MR CURTIN: Thank you.

14 MR JUSTICE NICKLIN: Right. That's it for today then. See
 15 you tomorrow.

16 (5.17 pm)

17

18 (The hearing adjourned until
 19 Wednesday, 3 May 2023 at 10.30 am)

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