



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

Day 8

May 5, 2023

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Phone: 020 4518 8448

Email: transcripts@opus2.com

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

Friday, 5 May 2023

1
2 (10.30 am)
3 MR JUSTICE NICKLIN: Right. Ms Bolton.
4 MS BOLTON: My Lord, good morning. My Lord, I believe we
5 need to go into private.
6 MR JUSTICE NICKLIN: Yes. Right. I'm sorry, for the two
7 people at the back of the court, for about five minutes
8 I just need you to leave court. You can come back
9 immediately after that, all right? Thank you very much.
10 (Hearing in private)
11 MS BOLTON: My Lord, we're just logging in LiveNote but I'm
12 calling Employee G. Just so your Lordship knows, that's
13 at page 1521 in the bundle and Employee G is [redacted].
14 MR JUSTICE NICKLIN: Thank you very much. Can you activate
15 the screen, please?
16 EMPLOYEE G (sworn)
17 Examination—in—chief by MS BOLTON
18 MS BOLTON: [Employee G], good morning. There should be
19 a document in front of you and it should be at page 1523
20 and it should say "First witness statement of
21 Employee G".
22 A. Yes, I've got that.
23 Q. If you could please turn through to page 1544. Can you
24 can just turn through the pages of the document until
25 you get to page 1544, please.

1

1 A. I seem to be missing 1544. I've got 1543.
2 Q. 1543, is there a signature on that page?
3 A. There is, yes.
4 Q. Is that your witness statement?
5 A. It is, yes.
6 Q. Is that witness statement still true to the best of your
7 knowledge and belief?
8 A. Yes.
9 MS BOLTON: [Employee G], if you can wait there, there may
10 be some further questions for you.
11 A. Sorry, I'm struggling to hear slightly at the moment.
12 MS BOLTON: If you wait there, there may be further
13 questions for you.
14 A. Very good. Thank you.
15 (Hearing in public)
16 Cross—examination by MR CURTIN
17 MR CURTIN: Good morning. I'm Mr Curtin, I'm going to be
18 asking you some questions relating to the statement that
19 you've submitted.
20 I'm going to go through your statement
21 chronologically, in order, as I pick up points.
22 A. Okay.
23 Q. I don't think we'll be here for too long, I hope.
24 Paragraph 5.
25 A. Yes.

2

1 Q. So it says here that you've worked at the site for about
2 ten years, correct?
3 A. That is correct, yes.
4 Q. And MBR bought the site in 2017 and you were working
5 here before that, when it was previously owned by
6 Harlan?
7 A. Yes, I was.
8 Q. So you were there during the transition period,
9 what's — it's been referred to as the transition
10 period?
11 A. That's correct, I was.
12 Q. While we're dealing with that period, I gather from
13 a number of witnesses that, in that transition period,
14 there was a process called the transition where because
15 Marshalls are a different company to the other
16 companies, they had to make room for the new product and
17 there was euthanasia of the old stock of dogs; is that
18 correct?
19 MS BOLTON: My Lord, you did say to Mr Curtin yesterday this
20 wasn't relevant and that's not what other witnesses have
21 said.
22 MR CURTIN: It's just to skirt round what I'm going to ask
23 him about, "Are you a puppy killer", that's all.
24 MS BOLTON: There's been repeated attempts to ask this
25 question, my Lord. We would say it's not relevant and

3

1 it's also been put in a way that isn't the case. That's
2 not what the witnesses have said.
3 MR JUSTICE NICKLIN: Mr Curtin, you've got the evidence.
4 Certainly my recollection of the evidence is that you've
5 got an acceptance that in the transition period the dogs
6 were euthanised. Are you saying I'm wrong about that?
7 MS BOLTON: My Lord, there was — no, Mr Hardy's evidence
8 was that some were.
9 MR CURTIN: Not all.
10 MS BOLTON: And the other witnesses your Lordship has said
11 that these questions didn't need to be asked and nobody
12 has said it was to make way for new product, which is
13 what's just been put to the witness, that that's what
14 other witnesses have said. That's not been said by any
15 witness or accepted.
16 MR JUSTICE NICKLIN: Right. Mr Curtin, you've already
17 established from the evidence so far that there were —
18 as a result of the transition, dogs were killed.
19 I don't think you need to go any further than that for
20 your purposes.
21 MR CURTIN: Okay. The reason I was doing it, I'm aware of
22 your ruling, was at some point I'm going to ask this man
23 a certain question. So it's just to — that's still —
24 MR JUSTICE NICKLIN: But Mr Curtin, on your protest message,
25 you're not protesting at the Wyton site, because you

4

1 don't know which employees were there back in the day
 2 when Harlan were there. You're not protesting and
 3 calling them puppy killers for what happened in
 4 2012/2013 because you don't know which of the employees
 5 were there at that time. Your protest message is
 6 directed to them because of their current activities on
 7 the site. It's as simple as that really.

8 MR CURTIN: Okay.

9 MR JUSTICE NICKLIN: Isn't it?

10 MR CURTIN: To me it is an issue back then, that there was
 11 on my case a mass killing by -- it's as if the potato
 12 factory was taken over, new owners, and they got rid of
 13 the old stock.

14 MR JUSTICE NICKLIN: I understand that but your protest
 15 message at the current site is not directed at historic
 16 acts, and because you don't know which of the employees
 17 were there --

18 MR CURTIN: Correct.

19 MR JUSTICE NICKLIN: Your message directed at the current
 20 employees is because of their current employment on the
 21 site by MBR and what they do at that site. That's what
 22 your message is about. So what you seem to be doing is
 23 trying opportunistically to get in other evidence that
 24 relates to earlier incidents of when dogs were killed.
 25 That's way away from the issue that you're dealing with

1 in these proceedings.

2 MR CURTIN: I understand. I understand the ruling and it
 3 was an attempt by me to slightly explore the guidelines,
 4 just so I can say to him when you are called -- but this
 5 man, I would call -- you know the line of questioning
 6 I'm going to call --

7 MR JUSTICE NICKLIN: I know.

8 MR CURTIN: And it has the same bearing whatever he does.

9 MR JUSTICE NICKLIN: Yes.

10 MR CURTIN: Let's deal with the topic now then, seeing as
 11 we're on it. So you're a man with an extensive
 12 experience in the animal experiments industry, yes?

13 A. Within the animal care industry.

14 Q. Yes. So part of this evidence, we've heard about a lot
 15 of shouting and name-calling. In the evidence against
 16 me, I'll be pointing you to some videos, "Shame on you"
 17 and "Puppy killer". How does that feel for you, for
 18 someone to be shouting "Shame on you" and "Puppy
 19 killer"?

20 A. I'd say it was rather unpleasant, wouldn't you?

21 Q. I'd agree. No one wants to be called a puppy killer.
 22 Are you a puppy killer?

23 A. No, I'm an animal care technician.

24 Q. Do you work for a company that does kill puppies?

25 A. I wouldn't say they kill them, no.

1 Q. What would you say then?

2 A. Occasionally, under welfare grounds, they may need to be
 3 euthanised.

4 Q. Only under welfare grounds?

5 A. As far as I'm -- yes.

6 Q. That's what you're saying. You just said it. What goes
 7 on inside MBR and other establishments where dogs go to
 8 is not the issue here. The issue here is the right to
 9 protest. So I'm unable to explore the last comment you
 10 make, "Only on welfare grounds". Let's go to what I do
 11 know, let's talk about -- are you aware that this
 12 company holds a bleeding licence?

13 A. I am aware of that, yes.

14 Q. And are you aware part of this project licence involves
 15 procedures called the terminal bleeding procedure?

16 A. I'm aware of that, yes.

17 Q. So you said -- so let's -- so there's a clue in the
 18 name, isn't there, "terminal"?

19 A. There is, yes.

20 Q. So a dog or a puppy goes in the room, it's the
 21 procedures room here, does it -- if it's going to be
 22 subjected to the terminal bleeding procedure, does the
 23 dog come back out of that room?

24 A. The dogs do not come back from the terminal bleed, no.

25 Q. So when I asked you does this company kill puppies, you

1 said it does occasionally, only on welfare grounds,
 2 would you like to change that answer?

3 A. They do it on welfare grounds but, yes, as part of the
 4 procedure for terminal bleed, the dog would be
 5 euthanised.

6 Q. I need to push this a bit more. I put it to you that
 7 Marshalls, the company you're -- well, you're employees
 8 of MBR Acres, they're in business to sell -- two main
 9 businesses. One, to sell dogs to laboratories, the
 10 other is to sell dogs' blood. Is that your
 11 understanding?

12 A. As a company, they do sell dogs' blood, yes.

13 Q. And isn't that the reason why -- isn't the reason why
 14 the terminal bleeding procedure is carried out is in
 15 order for Marshalls to sell the blood?

16 A. It is.

17 Q. So tell me about the "only welfare grounds". I don't
 18 understand your answer. Do you want to change your
 19 answer? Only on welfare grounds generally but we do
 20 have a bleeding licence and animals are euthanised as
 21 a result of that, for business purposes; would that be
 22 a better answer?

23 A. Obviously not a better answer, no, but they are
 24 euthanised on welfare grounds and as part of the
 25 terminal bleed.

1 MR CURTIN: Your Honour, can I ask for your assistance here
 2 so I can move on? Because I'm not satisfied with the
 3 answer as such. There's an incongruous -- could you
 4 help me? Because I feel I'm going to get, "Mr Curtin,
 5 sit down" if I --
 6 MR JUSTICE NICKLIN: No, carry on. Let's see what Ms Bolton
 7 wants to object to first .
 8 MS BOLTON: My Lord, that's exactly the answer that
 9 Mr Curtin has been given before. There's no ambiguity
 10 in that. It's really not relevant to what we're dealing
 11 with. And he's now asking for the court to help him on
 12 questioning on something that, one, isn't relevant and,
 13 two, that's the exact answer he's been given before.
 14 MR JUSTICE NICKLIN: I'm slightly -- I don't necessarily
 15 myself understand that dogs are only killed on welfare
 16 grounds but yet dogs do die as a result of the terminal
 17 bleeding procedure.
 18 MS BOLTON: Yes, and as other witnesses have explained,
 19 that's the only time they're subject to that procedure.
 20 That's the only time that happens. Because if you
 21 recall, one of the witnesses explained that otherwise
 22 the blood is taken from a live dog and the dog is kept
 23 alive. That's the only time it happens. That's been
 24 two witnesses' evidence already.
 25 I don't know if Mr Curtin is not understanding or if

1 he's trying to get a different answer, I'm not sure, but
 2 that's been explored and that's what they've been
 3 explaining. That's the point.
 4 MR JUSTICE NICKLIN: Well, it's not altogether clear to me.
 5 Is the position that the dogs that are subject to
 6 terminal bleeding would -- are to be put down on welfare
 7 grounds in any event?
 8 MS BOLTON: Yes.
 9 MR JUSTICE NICKLIN: Right.
 10 MR CURTIN: This is a whole -- that's a whole new --
 11 MS BOLTON: That's exactly what Mr Hardy explained.
 12 MR CURTIN: You're entering stuff that I'm not going to be
 13 able to explore.
 14 MS BOLTON: That's exactly what Mr Hardy was explaining.
 15 MR CURTIN: No, it wasn't. That's not my understanding at
 16 all .
 17 MS BOLTON: It's in the transcript.
 18 MR CURTIN: No, this is new.
 19 MS BOLTON: It's not new and that's what this witness is
 20 saying as well .
 21 MR CURTIN: So they're going to put them down for veterinary
 22 reasons and while we're at it -- that's not the bleeding
 23 business, no. Animals are specially selected --
 24 MR JUSTICE NICKLIN: Find me the part of the transcript of
 25 Mr Hardy's evidence.

1 MS BOLTON: We'll find the part of the transcript, my Lord.
 2 To explain, because this is something that hasn't
 3 been explored, there is something called blood dogs and
 4 they do not die. They give bloods which could help with
 5 other dogs, and that's normally how blood would be sold.
 6 That's --
 7 MR CURTIN: Normally, if there was one --
 8 MR JUSTICE NICKLIN: Okay, don't talk over each other.
 9 MR CURTIN: I apologise.
 10 MS BOLTON: I just want to make this clear so it might help.
 11 That's what the witnesses have been trying to explain to
 12 Mr Curtin when they say it's welfare grounds, because
 13 the only time it would be taken differently is where the
 14 animal is going to be euthanised on welfare grounds
 15 anyway.
 16 MR CURTIN: No.
 17 MS BOLTON: That's the point. Because they don't need to
 18 otherwise. They can take it from a live dog.
 19 MR JUSTICE NICKLIN: Right.
 20 MR CURTIN: My Lord, if I may?
 21 MR JUSTICE NICKLIN: I can't answer that now because I need
 22 to see what Mr Hardy said. Okay?
 23 MR CURTIN: Okay.
 24 MR JUSTICE NICKLIN: You're not going to pursue this any
 25 further. That is what the -- we need to look at the

1 evidence. Ask other questions of this witness.
 2 MR CURTIN: We can ask this man.
 3 MR JUSTICE NICKLIN: I now understand his -- well,
 4 Employee G, you may have heard what's been being
 5 discussed here. Can you help me with explaining your
 6 answer that dogs are only euthanised on welfare grounds?
 7 Am I to understand from that that your evidence is that
 8 where a dog is euthanised and blood is taken from them,
 9 that's essentially for dogs that were going to be
 10 euthanised anyway?
 11 A. Generally that is the case, yes. We will always try and
 12 select a dog that has underlying issues.
 13 MR JUSTICE NICKLIN: When you say "generally" --
 14 A. It is not always the case.
 15 MR JUSTICE NICKLIN: It is not --
 16 A. It is not always the case.
 17 MR JUSTICE NICKLIN: Right. Right, so it isn't. So there
 18 are occasions on which healthy dogs are euthanised for
 19 the purposes of collecting blood?
 20 A. That is correct .
 21 MR JUSTICE NICKLIN: Right.
 22 MR CURTIN: Thank you. We got there.
 23 MR JUSTICE NICKLIN: That's not what you just told me.
 24 MS BOLTON: My Lord, that was my understanding of Mr Hardy
 25 and Ms Pressick's evidence.

1 MR JUSTICE NICKLIN: It wasn't my understanding of their
 2 evidence.
 3 MS BOLTON: Apologies, my Lord. That was my understanding.
 4 MR JUSTICE NICKLIN: Right.
 5 MR CURTIN: So let's keep it simple ---
 6 MR JUSTICE NICKLIN: There was a real risk there, Ms Bolton,
 7 of you misleading Mr Curtin and if I'd accepted your
 8 submission and said that that was the end of the matter,
 9 we wouldn't have clarified that issue.
 10 MS BOLTON: My Lord, as I said to you, that was my
 11 understanding of the witnesses' evidence that both
 12 Mr Hardy and Ms Pressick were saying. If I've
 13 misunderstood, I do apologise. There was no intention
 14 to mislead the court. I'm very, very sorry. That's not
 15 been my understanding of the procedure. So I do
 16 apologise.
 17 MR JUSTICE NICKLIN: Right. You are counsel for MBR Acres,
 18 I'm surprised that you are not fully aware of all this.
 19 MS BOLTON: That's not been my understanding of the
 20 position. That's all I can say, my Lord.
 21 MR JUSTICE NICKLIN: Right. Okay, Mr Curtin.
 22 MR CURTIN: So when you hear "Shame on you" and "Puppy
 23 killer", it's not pleasant and it's not nice, that's
 24 what you said, yes?
 25 A. That is what I said, yes.

1 Q. Have I asked you already, a straightforward question,
 2 are you a puppy killer?
 3 A. I euthanise dogs when I need to.
 4 Q. Okay. Do you understand the amount of controversy
 5 involved in your business?
 6 A. I understand that people have different opinions on it,
 7 yes, and some people have strong beliefs.
 8 Q. For example, are you aware that there was yet another
 9 national paper news headline, a Daily Mirror headline
 10 about the company that you work for importing dogs into
 11 this country; are you aware of that, yesterday?
 12 A. I did see the article, yes.
 13 Q. And throughout your ten years, have you had occasion to
 14 look at the media and see stories not just about your
 15 company but about the general topic of animal
 16 experimentation and how controversial it is?
 17 A. I have seen articles.
 18 Q. Sorry, that was me, I apologise. I talked over you.
 19 What was the last response?
 20 A. I said I have seen some articles.
 21 Q. So do you accept then there are a significant amount of
 22 people in this country who take massive exception to the
 23 business carried out by MBR? You understand that, yes?
 24 A. I understand there's a great deal of people that might
 25 have strong beliefs on it either way.

1 Q. Yes, so either way, correct. So do you understand how,
 2 if someone wanted to express those strongly held beliefs
 3 against animal experiments and against the breeding of
 4 dogs at your site, that they would want to display that
 5 perhaps by standing at the gates with banners, shouting
 6 "Shame on you" and "Puppy killer"? Do you understand
 7 the scenario so far that I'm painting?
 8 A. I understand that some people may want to express their
 9 opinions in some form or another, yes.
 10 Q. Do you see it as a good thing that people are able to
 11 express their wishes --- their views, sorry?
 12 A. Everybody has a right to express their own views, yes.
 13 Q. And if someone took exception to this company, for them
 14 to be standing at the gates shouting, as you go in and
 15 out of work, "Shame on you, puppy killers", you find
 16 that acceptable, do you?
 17 A. I'm not sure I find intimidating people outside of their
 18 legal workplace acceptable, no.
 19 Q. I didn't ask that, did I? I asked about the people
 20 standing at the gates protesting, shouting "Shame on
 21 you" and "Puppy killer". I didn't ask about whether you
 22 think it's okay for workers from MBR to be harassed,
 23 I asked you about people shouting slogans and
 24 protesting.
 25 A. Yes, people can find shouting at themselves intimidating

1 though, wouldn't you say?
 2 Q. I don't know. We'll go on to that, we'll explore that
 3 with you. There could be a whole variety of responses
 4 to protestors being shouted at. Okay --- I mean
 5 protestors shouting.
 6 Like many witnesses in this case from MBR, you have
 7 this generic term. Paragraph 6, the last sentence, "the
 8 protestors"; paragraph 7, "the protestors"; paragraph 8,
 9 "the protestors". It's understandable but you use
 10 a generic term, is that correct, to cast a wide net over
 11 people who are expressing their wishes against
 12 vivisection? You lump them together as protestors, it's
 13 understandable that you do, but I'm just asking you ---
 14 we're just going to explore this ever so slightly. Is
 15 that correct?
 16 A. No, I'm more referring to the people outside of our
 17 site, not protestors as a whole.
 18 Q. Okay, so what's your idea of these protestors? Are they
 19 a special kind of people? When you refer throughout
 20 your statement to protestors, anyone can go outside the
 21 site, can't they? It could be anybody. What do you
 22 mean by the term? I'm just asking you.
 23 A. Could you rephrase the question for me?
 24 Q. Okay. Is it as simple as this then, because you talk
 25 about the protestors --- in a minute we'll come --- for

1 example, you just said about the harassment and alarm
 2 and the distress maybe caused by a particular action of
 3 a certain kind of protestor. Do you have an idea of
 4 people standing at the gates shouting "Shame on you" and
 5 "Puppy killer", and then there's people who would maybe
 6 shout and scream some aggressive things, "I'm going to
 7 get you", "You monsters", "We're coming for you", and
 8 then there's other people who perhaps physically attack
 9 the cars, try to open the doors or break the windows.
 10 Do you lump them all together as the protestors? I'm
 11 just asking.
 12 A. I should think I do, yes, because I don't pick them out
 13 individually.
 14 Q. Yes. I'm just exploring it. It's understandable why
 15 you do that.
 16 You talk about hiding your identity in paragraph 7
 17 and 8, yes?
 18 A. I do, yes.
 19 Q. So we've gathered you've worked in this industry for ten
 20 years, you're aware of the level of controversy, you're
 21 aware of yet another Daily Mirror article coming out
 22 just yesterday. When you worked for Harlan, before MBR
 23 took over, were you ever given guidance from the company
 24 or did you in fact do it yourself without any guidance,
 25 did you hide your identity in some ways before

1 Camp Beagle? For example, you're -- a party situation,
 2 someone says "Where do you work?" and rather than say
 3 "I work breeding beagles for experiments", you could
 4 give answers -- different answers, "I am a kennel
 5 assistant" or perhaps not even -- make up a job. So
 6 before Camp Beagle, were there other incidences, seeing
 7 as you've been involved so long in the industry, where
 8 you hid your identity?
 9 A. Before Camp Beagle, no, not so much.
 10 Q. Not so much but some?
 11 A. I probably had referred to myself as a kennel assistant
 12 before.
 13 Q. Because the controversy about animal experiments didn't
 14 start with Camp Beagle, did it? It's been going on for
 15 decades; that's right, isn't it?
 16 A. Yes, it has.
 17 Q. Paragraphs 10 and 11 and 12, they talk of the convoy,
 18 setting up a convoy, a convoy of workers, yes?
 19 A. Yes.
 20 Q. Was it a matter of choice by the management and the
 21 workers to arrange these convoys?
 22 A. It was management's plan.
 23 Q. Paragraph 13 you talk about:
 24 "The daily drums, loudhailers and shouting was
 25 intended to harass us, and it did".

1 Is that your statement?
 2 A. Yes, I believe it is.
 3 Q. Would you accept that there's -- if that is your reading
 4 of why people were there, would you accept there are
 5 other readings into why people might be outside the
 6 gates with loudhailers and drums, such as classic
 7 protesting, they're drawing attention, they want people
 8 to look at them, they want to be noticed because they
 9 feel there's a burning issue. Would you agree with
 10 that? This may be your understanding but do you
 11 understand that there's other reasons why people might
 12 go and protest other than the one you've stated here?
 13 A. It depends who it's aimed at. If it's aimed at myself
 14 being shouted at, then no, not so much.
 15 Q. Do you take it -- when you drive in and out of work and
 16 you say you've been shouted at, yes?
 17 A. Yes.
 18 Q. Say, for example, when you used to come in a convoy,
 19 when you would be able to -- would it be the case that
 20 it was only you that was shouted at?
 21 A. No, I believe everybody in the convoy was shouted at.
 22 Q. So why did you take it personally?
 23 A. Because some of the insults thrown were quite personal.
 24 Q. You haven't -- I'm not sure what statements you refer
 25 to. But is it your case, because I'm defending myself,

1 that Mr Curtin has shouted personal things at you?
 2 A. Would you like me to -- or would you like to point me in
 3 the direction of where I've said that in my statement?
 4 Q. No, I'm saying it's not in your statement.
 5 A. No it's not.
 6 Q. Apart from "Shame on you", but I'm shouting -- there's
 7 nothing in your statement to say that I've singled you
 8 out for any particular personal abuse, is there?
 9 A. No, there's nothing about you in my statement saying
 10 that.
 11 Q. So would you accept in my case, if you were to hear
 12 "Shame on you", it's a generic comment meant for all the
 13 workers and not just for your ears?
 14 A. I believe you're shouting at all of the workers, yes.
 15 Q. Okay. Paragraph 16. If I can take you to paragraph 13
 16 first of all, I'm sorry. You talk about driving in:
 17 "It was also a very distracting and stressful
 18 environment to drive through and made driving safely
 19 very difficult."
 20 A. Yes.
 21 Q. I'm agreeing with you there. To drive through or to
 22 drive past some protestors is going to be distracting,
 23 isn't it?
 24 A. Yes.
 25 Q. And paragraph 16:

1 " ... it was never easy or pleasant ... "

2 Again, I'm agreeing with you that there's people

3 shouting "Shame on you", this is -- other witnesses have

4 talked of their terror but you talk of "never easy",

5 "not pleasant" and "distracting". Is that an accurate

6 way how you feel rather than being terrorised by people

7 shouting? You just don't like it. Is that correct?

8 A. I think it was a risk to people in the road. That's

9 what I've said in my statement.

10 Q. Okay. 16:

11 "Having protestors, sometimes as many as a hundred,

12 who clearly hate you ... "

13 That's a strong comment, isn't it?

14 A. Yes.

15 Q. And whilst I understand someone shouting "Shame on you"

16 and "Puppy killer", I can understand you'd come to the

17 conclusion that these people hate you, but I ask you

18 to -- can you see a scenario where someone could be

19 shouting at you without hate? You don't know, this is

20 your guess that these people hate you. It's not a --

21 I can understand how you come to the conclusion but

22 that's just your opinion, isn't it, that they hate you?

23 A. It's my opinion, yes.

24 Q. You talked in paragraph 17 about the fact that sometimes

25 protestors bring their dogs and sometimes the dogs are

21

1 in the driveway and this causes you to feel unsettled,

2 correct?

3 A. Yes, I've said that.

4 Q. Again, I would agree with you. I've witnessed the same

5 myself.

6 Right. Paragraph 18:

7 "In the early days the police warned the MBR staff

8 that this tactic might be used by the protestors."

9 "This tactic" being that the protestors want to be

10 hit by a car, correct?

11 A. Yes.

12 Q. Can I ask you when that was told to you by the police?

13 A. It came down through our lines of management.

14 I couldn't give you an exact date, no.

15 Q. So it wasn't the police, it was the management. Did the

16 management tell you that the police had told them?

17 A. That's what I remember, yes.

18 Q. Do you ever recall -- other witnesses have --

19 a presentation given by the police when they came to the

20 site to address the workers regarding their safety and

21 that of perhaps some extreme behaviour that was possible

22 from protestors; do you remember such a meeting?

23 A. I remember the meeting but I don't think I was present

24 for it.

25 Q. So you're aware that the meeting took -- do you remember

22

1 the anti-terrorist police even? Would that ring a bell

2 or not?

3 A. I remember there was one scheduled but I don't believe

4 I went to it.

5 Q. Do you know why -- why didn't you go to it?

6 A. I believe I wasn't present on the day.

7 Q. Okay. I take exception to this, I've never heard it

8 myself and in fact I've had a friend who was killed

9 whilst protesting. So the idea that protestors want to

10 be hit I put to you is a scandalous piece of gossip.

11 MR JUSTICE NICKLIN: Mr Curtin, the witness is simply

12 repeating in this part of his witness statement what he

13 was told by the police.

14 MR CURTIN: Okay.

15 MR JUSTICE NICKLIN: You don't need to take issue with it.

16 MR CURTIN: Okay.

17 Paragraph 19, you talk about how you're becoming

18 frustrated about the fact that you have to cover up --

19 that you cover up your face a lot whilst at work?

20 A. Yes.

21 Q. It's inconvenient and uncomfortable et cetera?

22 A. It is, yes.

23 Q. But are you aware of -- you do accept that there are

24 a large section of people that are opposed to

25 vivisection, animal experiments, and you do accept that

23

1 they're going to exercise their right to protest? And

2 they're also -- do you accept they're also going to

3 investigate -- they're going to carry out investigations

4 into your company, such as what this company does, which

5 would involve perhaps filming the site?

6 A. I can understand they might want to try to find stuff

7 out about the site, yes.

8 Q. And to give livestreams from the camp. To fly the

9 drones. So to capture what protestors would see as

10 a crime scene on camera, you accept that, don't you,

11 that people are going to be filming?

12 A. I don't accept that it's a crime scene, no.

13 Q. No, sorry, that was my words. But you accept the fact

14 that people in the course of their protesting are going

15 to resort to using cameras?

16 A. I don't see why it's necessary to film staff, no.

17 Q. But I'm not talking about individual workers, I'm

18 talking about the workplace. If I wanted to do some

19 filming and make a documentary about MBR Acres, the fact

20 that there would be some people, some workers going

21 about their business, do you think that's a bad thing?

22 People shouldn't be allowed to do it?

23 A. I don't think the staff should be allowed to be filmed

24 personally, no.

25 Q. Okay, and the fact that you cover up, I put it to you

24

1 that fundamentally that's your choice to do that?
 2 A. It is, yes.
 3 Q. Have you been told to do it by the management?
 4 A. Been recommended.
 5 Q. And it's something that you do, that you've chosen to
 6 do, that's correct, isn't it? That's what you just
 7 said?
 8 A. That is correct, yes.
 9 Q. The bottom of paragraph 19, you talk about:
 10 " ... Dave Manning was harassed in public when he was
 11 with his family."
 12 Yes?
 13 A. He was, yes.
 14 Q. I've heard of this incident a number of times during the
 15 case of this evidence -- this trial, and I was aware of
 16 the incident around the time. I put it to you that it
 17 was a -- that's happened once, as far as I know, with
 18 workers from outside -- forget -- we'll perhaps come to
 19 the criminal attacks on people's houses, but the fact of
 20 a worker walking down the street, being confronted by
 21 a protestor, I know it happened once and this trial has
 22 heard about it but are you aware of other incidences?
 23 A. That's the only one I'm aware of.
 24 Q. I put it to you it happened locally in the streets of
 25 Huntingdon and we don't know the situation but it could

25

1 have just been a coincidence, couldn't it, that the
 2 protestors are in this area, Dave Manning lives in the
 3 area I presume, and it was just a coincidence. Is that
 4 possible, that it was just a coincidence? Not the
 5 coincidence that they should follow(?) him but the
 6 coincidence that they met and then there was some
 7 shouting. Sorry to waffle on, I'm not good at this, but
 8 I'm just -- you've already accepted it, that it
 9 happened, I put to you it happened once, and the actual
 10 fact that they met, is it possible that it was
 11 a coincidence? Neither of us know actually.
 12 A. I wouldn't like to say as I don't know.
 13 Q. No. Now we go on to paragraph 21 and it deals with
 14 a demonstration on 13 July which, as far as the history
 15 of the camp, it's quite early days, isn't it? The camp
 16 is like two weeks old, I would put to you, at this time.
 17 The camp began at July, would you accept that, the start
 18 of July?
 19 A. I think it started before that, didn't it?
 20 Q. Pardon?
 21 A. I believe it started before that.
 22 Q. I think it's not really contested, the very, very end
 23 of July -- June, sorry, start of July. I don't think
 24 it's too contested. Anyway a couple of weeks old, the
 25 camp, yes?

26

1 A. Sorry, I missed that bit.
 2 Q. I'm just asking you to accept that the camp -- we've
 3 been there now for 22 months, this was in the first
 4 couple of weeks?
 5 A. Yes.
 6 Q. Okay. Let's go to the video. I don't intend to show
 7 the whole video because I don't really contravene your
 8 evidence, but if we can just show the video. It's video
 9 number 46. One minute and six seconds.
 10 Before we play it, I'm defending myself, I have your
 11 witness statement in front of me and it's just that my
 12 name is on your statement. Before I ask you the
 13 questions, did you make this statement of your own free
 14 will and volition?
 15 A. I did, yes.
 16 Q. Were you guided while you made the statement?
 17 A. We had some guidance on the -- how to express our
 18 wording.
 19 Q. And the introduction of my name, is that by you or was
 20 that under guidance from the claimants' solicitor?
 21 A. That would have been me.
 22 Q. Did you know my name?
 23 A. I did, yes.
 24 Q. We'll come back to this in a moment. We'll come back to
 25 this after we've dealt with this issue at some point,

27

1 about how you knew my name.
 2 Right, so, let's watch the video for maybe 30
 3 seconds, from there.
 4 (Video played)
 5 Can we stop? There's a person with a camouflage
 6 jacket with his back to us, he's just out of sight.
 7 Are you saying that person is me? Is that the one you
 8 identified? If it is, I would accept it. That is me.
 9 A. Yes.
 10 Q. I've got a loudhailer, yes?
 11 A. Can't see it at the moment but, yes, I should think
 12 there is.
 13 Q. And I think, if my memory -- as far as the megaphone,
 14 there's not much mega in it, it's a very, very small
 15 little megaphone. But it's a kind of megaphone, yes.
 16 But let's watch.
 17 (Video played)
 18 Okay. If we could stop there. I have no need to
 19 show the entire video because, as far as your statement
 20 goes, that incident there that I'm standing at the side
 21 of the road with a megaphone shouting, I can -- as to
 22 what I shouted -- if we can play a bit more, please.
 23 (Video played)
 24 Okay, if you stop there. So that incident there,
 25 that's the only time in your statement you've mentioned

28

1 me and I'd like to perhaps — I don't need to show any
 2 more of the video. The rest of the video shows the
 3 workers coming in with various comments being made.
 4 Mr Curtin features no more in this video, otherwise you
 5 would have put it in there; is that correct? The fact
 6 that I'm shouting on the verge at the top of the road
 7 with a megaphone, that's the entirety of your evidence
 8 against me, isn't it? If you look at the statement.
 9 A. I just said that you're present in the bell mouth of the
 10 access road, if you're referring to paragraph 22.
 11 Q. Okay. But even that, even me just standing there at the
 12 road with a megaphone, that's unpleasant for you,
 13 isn't it? My being there —
 14 A. Distracting.
 15 Q. — is unpleasant for you, yes?
 16 A. Distracting.
 17 Q. Distracting. What about unpleasant? Someone greeting
 18 you as you go into work, "Shame on you", for example?
 19 A. If that's what you said, then yes.
 20 Q. Let's go on to a similar incident, 13 July. This will
 21 be the same day, so that's what happened when you went
 22 into work. Now let's see what happens when you came out
 23 of work. The reason again we need to go through this is
 24 because you've mentioned me.
 25 Ah, okay, before we do that actually — forgive me

29

1 if I ever do this, go off on a few tangents, but — so
 2 you were able to say — if we watch the rest of that
 3 video, there's comments being made to you that you may
 4 take issue with but you've put me in the statement. So
 5 there I was — and I didn't say that I was saying "Shame
 6 on you", but I was just there with a megaphone shouting
 7 something. You haven't said anything specifically. But
 8 why did you choose to put me in the statement in the
 9 first place?
 10 A. I put anybody in there that I could recognise.
 11 Q. And how was it, just a few weeks into the campaign, how
 12 was it you were able to recognise me?
 13 A. Because I'd probably seen some live videos.
 14 Q. Okay. So did you used to — like other workers, you're
 15 not the first person at all in fact, I think nearly
 16 every worker so far has agreed that they've followed the
 17 camp in some way. So did you used to watch the social
 18 media sites?
 19 A. I did, yes.
 20 Q. Okay. Since then — when did you make this statement?
 21 Do you remember?
 22 A. I don't remember off the top of my head, no.
 23 MR JUSTICE NICKLIN: January 2023.
 24 MS BOLTON: It's on the screen.
 25 MR CURTIN: So you made this in January 2023. Since that

30

1 time, since this early time when you already knew my
 2 identity and you've explained in a very simple way how,
 3 what else do you know about Mr Curtin since that time?
 4 Have you gained, as far as you're concerned, any more
 5 knowledge about Mr Curtin?
 6 A. I've heard a few things.
 7 Q. Could you tell the court about those few things? And
 8 don't be timid.
 9 A. No, I'm not. I've heard that you've got a history of
 10 being arrested, protesting.
 11 Q. Arrested for?
 12 A. For various protesting things.
 13 Q. Anything else?
 14 A. I believe there was a grave desecration, wasn't there?
 15 But ...
 16 Q. You believe there was a grave desecration. What do you
 17 know — what's your understanding of this grave
 18 desecration?
 19 A. That's just something I've heard. It could well be
 20 gossip.
 21 Q. How did it make you feel when someone said that to you
 22 or told you? Or did someone tell you that or did you
 23 research that yourself?
 24 A. Somebody told me that.
 25 Q. In the — if I can call it the canteen gossip, very

31

1 understandable, we're all human beings. I can't imagine
 2 being in a workplace where you wouldn't chat to each
 3 other about this and that and I can't imagine living in
 4 a world where you had this daily protest and you don't
 5 chat. Do you chat with other workers about the
 6 activists?
 7 A. There's been chat about the activists, yes.
 8 Q. Have you ever been aware of a Facebook site called
 9 Connie Jurtin?
 10 A. I might have seen a post or two but could not remember
 11 any of it.
 12 Q. And your memory of that — because my name is
 13 John Curtin and there's a site called Connie Jurtin, try
 14 and remember what you might — if you can give the court
 15 as much information of what you might remember about
 16 them. You said you might have seen a few posts. If you
 17 could give the court some information it would be
 18 helpful about what you know, about what you remember
 19 about the Connie Jurtin.
 20 A. I just remember it was seen to be a site that was giving
 21 the opposite side of views you might have had, or not
 22 necessarily opposite views to you but they didn't seem
 23 to like you very much, as far as I'm aware.
 24 Q. No, they didn't. So do you remember things like
 25 allegations that I was a thief, that I was stealing

32

1 money from the camp, that I was a cult leader, a bully,
 2 even as far as things like being a sex predator; does
 3 that refresh your memory at all?
 4 A. Now you've said it, there was probably some stuff about
 5 that.
 6 Q. About all the things I've just said? The thief --
 7 A. I don't remember the sex predator one, thankfully,
 8 but --
 9 Q. Thief, bully, sex predator, how about those three?
 10 A. No, I remember the thief and the bully.
 11 Q. Okay, good. Well, not good.
 12 Having this information about me, what effect did it
 13 have on you, if you were to look at Mr Curtin, what sort
 14 of -- from the things you've heard, how would that make
 15 you feel about me?
 16 A. It would make me think that you're some kind of
 17 disturbed person.
 18 Q. A what person?
 19 A. A disturbed person.
 20 Q. Disturbed.
 21 A. Possibly somebody with issues.
 22 Q. Do you think I've got issues?
 23 A. I wouldn't like to say. I don't know you.
 24 Q. You wouldn't like to say, but do you think?
 25 A. I think it would take a disturbed person to desecrate

1 a grave, if that is what happened.
 2 Q. Because you don't know, do you?
 3 A. I don't know, no, I didn't research it.
 4 Q. But I might have done?
 5 A. You might have done.
 6 Q. Let's show a little bit of the video. Again, Mr Curtin
 7 was on the right side with the megaphone, 3.56.12.
 8 MR JUSTICE NICKLIN: Video 24, or perhaps not.
 9 (Video played)
 10 MR CURTIN: If we could stop the scene there, before we
 11 start. Two weeks into the camp, you can see the police
 12 officer, can't you, on the left? Security guard on the
 13 right, couple of security guards and protestors
 14 assembled on the drive and in front of the gate, yes?
 15 A. Yes, that's correct.
 16 Q. So 3.56.12 -- let's just play it.
 17 (Video played)
 18 Stop there. If we're looking at the video now,
 19 there's a person with -- I don't know if you can see it,
 20 it's just gone out of shot, did you see the person with
 21 the megaphone that's standing just the other side of the
 22 car? The side away from the tent. Did you see?
 23 A. My picture is quite small so --
 24 MS BOLTON: Replay it.
 25 MR CURTIN: Yes, we'll just go back and replay it.

1 (Video played)
 2 If you could stop there. Did you notice -- you can
 3 just see -- if you look at the -- there's a woman
 4 bending towards the car and there's a man with
 5 a baseball cap. If you just look through them, in the
 6 distance there's Mr Curtin with a megaphone, yes?
 7 A. Yes.
 8 Q. I feel no need to play the video any more. Between me
 9 and you, we can go through your statement and if I could
 10 help you, on the megaphone, and that is me, I think
 11 there's one megaphone there, "Are you going to go home
 12 and have a shower? You will never wash this place off.
 13 You will never wash this stink away". Then I can hear
 14 myself saying at some point, "When you were at school
 15 did you want to be a puppy killer? What do you say when
 16 people ask you where you work? Where did you stay?
 17 Where do you work? What do you tell them? You'll never
 18 wash this place off".
 19 In fact we should watch the video. Let's watch it
 20 because I ask you to listen out for these type of
 21 phrases --
 22 A. Can you direct me to the paragraph I should be looking
 23 at, please?
 24 Q. It's paragraphs 25, 26 and 27, and let's just watch the
 25 video but I ask you to look out for the way that

1 Mr Curtin uses repeated terms, the same sort of terms,
 2 "You'll never wash this place away", for example. Yes,
 3 so each car -- let's watch the video and I'll ask you
 4 some questions.
 5 (Video played)
 6 Okay, can we stop there? Now, we can see two police
 7 officers there talking to a protestor, can't we?
 8 A. Yes.
 9 Q. So the police -- that man is standing in front of a car,
 10 the first car, and the policeman doesn't appear to be
 11 grabbing hold of him or making any attempts at this
 12 point to remove him, does he?
 13 A. Not at this point, no.
 14 Q. Would this -- you've seen this before. Would this
 15 surprise you? Would you expect the policeman to perhaps
 16 take a stronger hand?
 17 A. I thought they might, yes.
 18 Q. I put it to you that what you're seeing here is the
 19 police facilitating two things: one, a protest, a lawful
 20 protest and, two, the passage of the workers out of the
 21 site. That protest in this case definitely seems to
 22 involve some obstruction of the highway, not stopping
 23 the cars but some slowing down of the cars so they can
 24 see your banners. Would you accept that scene?
 25 A. I believe the cars are stopped at some point.

1 Q. Okay, let's carry on.
 2 (Video played)
 3 Stop there. "Look at all the support we're getting,
 4 no one loves a dog killer". Did you hear that?
 5 A. Yes, I heard it.
 6 Q. Good, okay. Carry on.
 7 (Video played)
 8 Stop there. So one car has most definitely been
 9 slowed down -- not by me, I should add, but by other
 10 protestors. Is that right?
 11 A. By the protestors, yes.
 12 Q. Well, I'm asking you -- I'm saying it's not me that's
 13 blocking the car there.
 14 A. I didn't see you in the way that time, no.
 15 Q. Good. I'm asking you to look now, this is another car,
 16 so again I would ask you to listen out for perhaps
 17 a sort of similar behaviour towards this car that the
 18 other cars get. There's nothing special treatment this
 19 car is going to get, including what I say on the
 20 megaphone. Okay, watch the video.
 21 (Video played)
 22 Okay, stop there. There's Mr Curtin on the right
 23 with a small megaphone. Correct?
 24 A. Yes.
 25 Q. Addressing the car. Then would you accept that the

1 police seem quite relaxed? On one -- if you just look
 2 at this, on one level, it's "Oh, dear, there's a problem
 3 here" but if you look at the body language of the
 4 police, they're not quite -- they don't seem to be
 5 reacting to a serious public order situation, do they?
 6 A. Not at the moment, no.
 7 Q. Okay, if we carry on.
 8 (Video played)
 9 Stop there. Did you hear "You know the rules",
 10 did you hear that?
 11 A. I didn't but if you say that's what was said ...
 12 Q. Yes, if you listen -- if you watch this a bit more,
 13 there seems to be some -- I don't know, I'll ask you at
 14 the end, some sort of agreement between the protestors
 15 and the police that when this man -- I don't know if
 16 it's made clear but I'll put it in your head first, that
 17 there seems to be some kind of unwritten rule that, as
 18 far as the protestor in the white T-shirt, he's going to
 19 block each car and when the car driver asks him to move
 20 out the way, he will move. This seems to be kind of
 21 sanctioned by the police. Let's watch the video, I'd
 22 ask you to have that in mind.
 23 (Video played)
 24 Stop there. So it's another car. So would you
 25 accept that each car seems to be getting a similar

1 treatment, some shouting, some level of obstruction and
 2 then on their way, and the police and the protestors
 3 seem to be accommodated to this? I just ask you to have
 4 that in your mind as we watch the video further.
 5 (Video played)
 6 Can you stop there? Could you take it back
 7 a second? Mr Curtin there in the background with the
 8 small megaphone, yes?
 9 A. Yes.
 10 Q. Okay. Play a bit more.
 11 (Video played)
 12 Stop there. Did you see the protestor gesture
 13 towards the car, "Come forward"?
 14 A. Yes.
 15 Q. Okay, carry on.
 16 (Video played)
 17 Shall we stop there? That's the security guard,
 18 Dave Manning, he's pointing something out to the police
 19 to get them to stop banging on the cars. Yes?
 20 A. I don't know what he was pointing out but he was
 21 pointing at something, yes.
 22 Q. He said -- I heard him say "Stop banging at the cars".
 23 A. Right, okay.
 24 Q. I think he's addressing -- I think he's addressing the
 25 police. But the security guards aren't complaining to

1 the police, are they? "Get these protestors out the
 2 way". There seems to be what I would describe --
 3 I would describe this as a ritual. Do you understand
 4 what I mean by -- how I could describe this? It appears
 5 to be a kind of ritual, a kind of agreement between
 6 everybody there really, and some understanding of what's
 7 happening; would you agree with that?
 8 A. I don't think there was any kind of agreement between
 9 us, no.
 10 Q. Okay, between the police and the protestors, you don't
 11 know but there may be, yes?
 12 A. I wouldn't know.
 13 Q. Okay. Let's watch the video.
 14 (Video played)
 15 Stop there. It's difficult to pick up but the
 16 protestor said something to the car driver about,
 17 "You've got to gesture and once you do that, once you
 18 ask me to move out the way, I will. That's the law".
 19 This protestor seems to be telling everybody what the
 20 law is. If we could carry on.
 21 (Video played)
 22 So, again, stop there. The same protestor stands in
 23 front, seems to be waiting for the driver to make some
 24 sort of sign to him to move out the way, then he'll move
 25 out the way. I'm just suggesting that this is what's

1 happening, I'll ask you further questions at the end of
 2 the video. Do you want to carry on?
 3 (Video played)
 4 Can you stop there? "He hasn't asked me to move
 5 yet". So there does seem to be some acceptance from the
 6 police that this man, this is the way he's going to
 7 protest and, as far as the police are concerned, they
 8 don't seem to feel any necessity to make arrests or
 9 change the situation, does it?
 10 A. It might be not in their power at the time, no. I don't
 11 know, I'm not a law student.
 12 Q. Okay, correct, carry on.
 13 (Video played)
 14 So, stop there. There's a man now talking to the
 15 protestor [sic], that would be the same man that
 16 obstructed some of the cars and he seems to be having
 17 a chat to the police officers; is that correct?
 18 A. It looks like it, yes.
 19 Q. So I invite you to accept my suggestion that there's
 20 a kind of formalised ritual even taking place there. It
 21 doesn't seem to be a free-for-all.
 22 A. It seemed like the protestors were controlling the
 23 situation.
 24 Q. I'll just take you to one point in paragraph 27. The
 25 last three lines you mention some names:

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1 "The conduct of the protestors ... D6 ... D11 ...
 2 and D9 ... prevented me from freely passing along the
 3 Access Road ..."
 4 Correct?
 5 A. Yes, that's correct.
 6 Q. At what point -- you just watched the video -- at what
 7 point did Mr Curtin stop your free access along the
 8 access road? I put it to you that Mr Curtin didn't.
 9 Mr Curtin was standing at the side with a megaphone
 10 whilst other protestors played some part in slowing the
 11 traffic down?
 12 A. Yes, that could be the case.
 13 Q. Excellent. Right, 15 August.
 14 MR JUSTICE NICKLIN: Before we leave that, can you help me,
 15 Employee G, about -- can you identify Scott Patterson
 16 and Sam Morley -- show the video, please. Can we get
 17 the video back? Rewind it to any of the car scene.
 18 Are you able to help me with who these -- there's a man
 19 who has a sort of pony tail wearing a --
 20 A. Yes, that would be Scott Patterson, my Lord.
 21 MR JUSTICE NICKLIN: Right, yes. And then the man who we
 22 can see there standing directly in front of the car with
 23 the white T-shirt and the black baseball cap?
 24 A. Sam Morley.
 25 MR CURTIN: That puts me in an impossible situation but

42

1 I think he may be incorrect there, but I don't want to
 2 tell you which one he is just because of 40 years of --
 3 MR JUSTICE NICKLIN: Don't worry.
 4 MS BOLTON: Can we show a bit more video because I think
 5 there's a few people who look very similar.
 6 MR JUSTICE NICKLIN: All right, show a bit more.
 7 (Video played)
 8 MS BOLTON: Pause there, please.
 9 MR JUSTICE NICKLIN: Pause there.
 10 MS BOLTON: We've gone too far.
 11 (Video played)
 12 MS BOLTON: If you could pause here.
 13 MR JUSTICE NICKLIN: Pause there.
 14 A. Oh, sorry.
 15 MR JUSTICE NICKLIN: So you have two men there, one in
 16 a grey T-shirt and a black baseball cap and then beyond
 17 him, standing to his left, you might --
 18 A. My apologies.
 19 MR JUSTICE NICKLIN: Go on.
 20 A. My screen is quite small here. It's Sam Morley in the
 21 grey T-shirt there I believe.
 22 MR JUSTICE NICKLIN: Right. Do you know the person in the
 23 white T-shirt?
 24 A. From this screen that I've got, I really couldn't say.
 25 MR JUSTICE NICKLIN: Okay.

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1 MS BOLTON: I don't think we know, my Lord. Yes, we don't
 2 know.
 3 MR JUSTICE NICKLIN: Right, okay.
 4 You wanted to go to 15 August I think.
 5 MR CURTIN: Yes, paragraph 29. Do you have it in front of
 6 you?
 7 A. I have, yes.
 8 Q. We've watched this video, because I've cross-examined
 9 a number of witnesses, and let's see if we can come to
 10 some sort of position where I don't have -- let's see if
 11 we can go through your statement without too much
 12 dispute.
 13 So are you aware of the -- if I can maybe talk about
 14 the general scenario that day, the general incident,
 15 yes? If I could.
 16 A. Yes.
 17 MR JUSTICE NICKLIN: Well, I'll tell you what, Mr Curtin, if
 18 we're going to move on to 15 August, we'll take our
 19 break now. We'll reconvene at midday.
 20 Employee G, thank you for being on the line. We're
 21 going to have a 15-minute break. Please don't discuss
 22 your evidence with anybody during that break. That's
 23 nothing personal to you, it's a warning I give to all
 24 witnesses, all right?
 25 A. Of course.

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1 MR JUSTICE NICKLIN: Thank you very much.
 2 (11.46 am)
 3 (A short break)
 4 (12.01 pm)
 5 MR JUSTICE NICKLIN: Right. Okay, carry on, Mr Curtin.
 6 MR CURTIN: Hello, is anybody there on the other side?
 7 A. Yes, I'm here.
 8 Q. Great. So 15 August, I've showed this -- I've been
 9 through this video a number of times with other
 10 witnesses and let's see if we can come to some
 11 agreement. If I could take you to your last sentence in
 12 paragraph 32:
 13 "She clearly had no appreciation that we had been
 14 waiting at the rally point since 07.30 for the police to
 15 confirm it was safe for us to travel to the Wyton Site
 16 ... at around 10.17."
 17 Correct?
 18 A. Yes.
 19 Q. I don't know if you remember the video but I'm asking
 20 you, this would be my reading of it and tell me if it
 21 clashes with yours. First of all, the reason why you
 22 were part -- at the rally point from 7.30 to 10.17,
 23 you're saying -- is it your information that you were
 24 waiting for the police to give you the go-ahead that it
 25 was safe to go in?

1 A. That's what we heard, yes.
 2 Q. You obviously had no idea what was happening at the site
 3 itself because you weren't there?
 4 A. I wasn't there, no.
 5 Q. Were you aware there was a demonstration taking place
 6 that day and there were going to be more people than you
 7 would expect on a normal day, yes? There were going to
 8 be extra people at the site?
 9 A. We knew there was a demonstration, yes.
 10 Q. So the bit where you've said there, "She clearly had no
 11 appreciation ...", was that after watching the video and
 12 seeing and hearing the words of Lucy Windler basically
 13 saying, "The workers are in now", having some relief; it
 14 wasn't Lucy Windler on the commentary, saying "We
 15 prevented -- we stopped the workers coming in". It was
 16 on the contrary, "We allowed the workers to get in". Is
 17 that correct? Do you remember hearing that on the
 18 video, that there were at least -- amongst some of the
 19 protestors, there was a drive to actually get you in
 20 safely?
 21 A. I remember her saying, "It took them long enough, but
 22 they're finally here".
 23 Q. Okay. On the video, I could show it to you, Mr Curtin
 24 addressing the protestors, saying, "We're going to let
 25 the cars in". Would you accept that or do you need to

1 see it? I can show it to you very easily -- well, not
 2 very easily.
 3 A. I think I've got that in my statement, haven't I?
 4 Q. I think -- yes, let's watch that, it's a very short
 5 incident. Three minutes 32. Before we watch it, I would
 6 ask you -- I can go to the point if you want, that this
 7 is the second time I'm very clearly saying to people,
 8 "Get out of the way, let them in", this is the second
 9 occasion. Would you accept from me that that's possible
 10 at least?
 11 A. I can say that I heard it once at least.
 12 Q. Okay. Three minutes 50. [Video 205].
 13 (Video played)
 14 Can we take it back a bit before?
 15 (Video played)
 16 Stop there.
 17 A. My Lord, I have no video at the moment.
 18 Q. Okay. If you just wait there, hopefully ...
 19 A. Okay, I have some now, thank you.
 20 Q. Okay.
 21 MR JUSTICE NICKLIN: You might want to go back just a little
 22 bit. That's fine. Thank you.
 23 (Video played)
 24 MR CURTIN: So if we stop there. So you've been held in the
 25 lay-by for upwards of three hours, you're heading

1 towards a lot of people, you've got a police escort, so
 2 I could imagine having some nervousness about this thing
 3 you're approaching. Yes?
 4 A. Yes, I should think so.
 5 Q. Play the video.
 6 (Video played)
 7 Can we stop there? Did you hear those words?
 8 A. I did hear those, yes.
 9 Q. Going, "Get the photographer to get the F out the way,
 10 get out the way, let these people in". Did you hear
 11 that?
 12 A. I heard that, yes.
 13 Q. Then we'll play the video just for maybe 30 more
 14 seconds, just for when the first car perhaps comes in
 15 contact with the protestors. I invite you to see that
 16 what in fact does happen, apart from the gates being
 17 shut, that there seems to be a co-ordinated disciplined
 18 response from the protestors to actually facilitate the
 19 cars coming in. There's nobody -- you won't see anybody
 20 blocking the road, for example. If we could watch the
 21 video.
 22 (Video played)
 23 Stop there. That baldy-headed person above the red
 24 car I put it to you is me, standing beside the road,
 25 next to the police officer. Could you accept that?

1 A. Yes, you're there.
 2 Q. Okay. Thank you.
 3 (Video played)
 4 Can you stop there? Could you hear some muffled
 5 gravelly voice saying, "Keep the discipline"?
 6 A. Yes, I heard something like that.
 7 Q. I'll put it to you that that's my voice. Would you
 8 contest that?
 9 A. If you say so.
 10 Q. Excellent. Okay, I think that's all we need to see.
 11 So would you accept that, by what it looks like,
 12 Mr Curtin and Lucy Windler at least are making efforts
 13 to make sure you actually did get into work without
 14 having to drive through some crazy frenzied mob and
 15 chaos? There did seem to be from that video, would you
 16 accept, a movement by at least myself and Lucy Windler
 17 to facilitate you actually getting into work safely.
 18 Can you concede that or how far are you prepared to
 19 concede on my version of things, as they looked at least
 20 from watching that video?
 21 A. It did seem like you were one of the ringleaders at the
 22 point and, yes, I did hear you ask people to get out of
 23 the way. But should we really need to be let into our
 24 lawful work?
 25 Q. Well, that's another point. You describe me as one of

1 the ringleaders. In this case it looks like I'm one of
 2 the ringleaders to -- whilst being part of the protest,
 3 to make sure that we keep a lid on this thing, that
 4 a protest happens but I'm one of the ringleaders in the
 5 negotiation of a peaceful outcome to this particular
 6 day, and it could have gone very different. Would you
 7 accept that?
 8 A. It could have gone very different.
 9 Q. Okay, thank you. Right. Let's move on to paragraph 60.
 10 A. Yes, okay.
 11 Q. The first sentence -- have you got it?
 12 A. Yes.
 13 Q. "The protests outside of the Wyton Site are difficult to
 14 deal with each day."
 15 Now, I'm accepting that. And in your long career,
 16 well, ten years of being involved in this controversial
 17 industry, you're aware -- you've seen protests before
 18 and you're aware of the nature of protesting against the
 19 industry, yes?
 20 A. I believe this was actually some of the first that I've
 21 seen in my ten years. We've had very small-scale,
 22 possibly one person, two people, outside the gates for
 23 an hour or so. But previously, no.
 24 Q. So you were working there when it was Harlan.
 25 A. I was.

1 Q. Harlan, are you aware that Harlan took an injunction out
 2 against protestors?
 3 A. I know there was an injunction in place when I started.
 4 Q. Is it your understanding that Harlan took an injunction
 5 out against protestors on the basis of the
 6 demonstration, the one demonstration you'd just spoken
 7 about, or I put it to you there has been a series of --
 8 to me, it's not a controversial point. There has been
 9 a history of protests at that site, would you accept
 10 that?
 11 A. I would accept that. You asked me what protests I had
 12 seen in my ten years there.
 13 Q. Okay, excellent. But I just want to go to this first
 14 sentence, these protests are "difficult to deal with
 15 each day". That is the case, isn't it? It's one thing
 16 going in and out of work facing a protest; to deal with
 17 it every day, that is another level, isn't it?
 18 A. It is, yes.
 19 Q. But would you accept that it's lawful to protest outside
 20 your place every day?
 21 A. I accept that peaceful protest is lawful out there, but
 22 I do believe that this one has gone well beyond peaceful
 23 at times.
 24 Q. Okay. When you say "peaceful", would you accept that
 25 it's lawful to have loud, noisy, animated, passionate

1 demonstrations outside of your gates every day?
 2 A. As long as they don't intimidate staff members I would
 3 say.
 4 Q. Excellent. So:
 5 "The protests, and especially the incidents that
 6 I have described above and the conduct of the specific
 7 Defendants that I have identified, was threatening and
 8 intimidating ..."
 9 Is it your case -- and remember I am defending
 10 myself -- this generic protestors, is there anywhere --
 11 it's not part of your evidence against me that
 12 I threatened you or I intimidated you, is it?
 13 A. I don't believe I said anywhere in my statement that you
 14 threatened or intimidated me.
 15 Q. Let's deal with the last bit:
 16 "... and I worry that the protestors still wish to
 17 do harm to me."
 18 A. Yes, generically.
 19 Q. But perhaps in my case, you've heard all these things
 20 about me, you think I may be disturbed, perhaps you have
 21 some extra fear of me, not based on what I'd done but
 22 based on what you've heard about me. Would that be
 23 correct?
 24 A. Some of what I've seen about you, yes.
 25 Q. You talk about how:

1 "They have attacked the homes of other staff and
 2 they clearly have no regard for us ..."
 3 From what you saw on that video, is it possible that
 4 Mr Curtin did have some regard for the workers and that
 5 you can clearly see him trying to get them in; would you
 6 accept that?
 7 A. I don't believe that was regard for the workers, no.
 8 Q. Okay. Paragraph 62, you talk about -- it's about,
 9 again, your identity. You live in the local area next
 10 to Wyton:
 11 "I have been yards behind the protestors in the
 12 local ... Morrisons, but thankfully they have not
 13 recognised me."
 14 What about the people that read the Daily Mail
 15 yesterday and were horrified? Would you class those
 16 people, someone reading the Daily Mirror and are
 17 horrified, would they class as a protestor yet?
 18 A. No, I don't believe so.
 19 Q. So a protestor is someone who it's a gang of people and
 20 the thing they have in common is that they've physically
 21 been outside your gates, is that what you call by "the
 22 protestors"?
 23 A. A protestor is somebody who is protesting, surely.
 24 Q. But what about someone, say, who lives in your area,
 25 that has very strong views, they've never been to

1 a protest, but is it your feeling that if this person
 2 who lives in your area, even though they've never been
 3 to a demonstration, they read the Daily Mirror, isn't it
 4 possible that you would have fear of that person? This
 5 is a person with equally as strong held beliefs, if not
 6 more than the protestors, it would make you
 7 uncomfortable if they recognised you? Is that correct?
 8 They've never been to a protest but they've got very
 9 strong views about animal experiments, they've never
 10 been to a protest, that's someone that you would want to
 11 avoid perhaps revealing your identity to and your
 12 workplace?
 13 A. And how would these so-called people realise my
 14 identity?
 15 Q. Exactly -- by gossip in your local community. You said
 16 if it was known in the local community where you worked,
 17 and gossip being gossip, do you worry about your
 18 neighbours finding out that you work there?
 19 A. I don't know because I don't involve myself with gossip
 20 generally, so --
 21 Q. But do you worry about your neighbours --
 22 A. (Inaudible - overspeaking).
 23 Q. Do you worry about people in your neighbourhood finding
 24 out where you work?
 25 A. I would be cautious with letting some of my neighbours

1 know, possibly.
 2 MR CURTIN: Okay, good. I do believe that's all the
 3 questions I have for you. Thank you.
 4 MS BOLTON: No re-examination, my Lord.
 5 MR JUSTICE NICKLIN: Thank you very much, Employee G. I'm
 6 sorry that I have to refer to you like that but you'll
 7 understand that we're in open court now and I'm taking
 8 measures to protect your identity. Thank you for giving
 9 your evidence. That completes your role in the trial.
 10 A. Not a problem. Thank you, my Lord.
 11 MR JUSTICE NICKLIN: Right. Next?
 12 MS BOLTON: My Lord, the next witness is Employee V.
 13 MR JUSTICE NICKLIN: Thank you.
 14 MS BOLTON: My Lord we might need a minute just to take away
 15 LiveNote and everything before --
 16 MR JUSTICE NICKLIN: That's all right. I'll wait here.
 17 MS BOLTON: My Lord, it's page 1711 in the persons unknown
 18 bundle.
 19 MR JUSTICE NICKLIN: Employee B?
 20 MS BOLTON: V, my Lord.
 21 MR JUSTICE NICKLIN: I've got it at 1359.
 22 MS BOLTON: V, my Lord.
 23 MR JUSTICE NICKLIN: Oh, V, sorry.
 24 MS BOLTON: Sorry. 1713, my Lord.
 25 My Lord, we also need to go into private.

1 MR JUSTICE NICKLIN: If you could step outside, I'm sorry
 2 for those of you who have come -- we're just going to
 3 take five minutes. I have to get the witness sorted out
 4 and then you'll be invited to come back in. Thank you
 5 very much.
 6 (Hearing in private)
 7 MS BOLTON: My Lord, the witness' name is [redacted].
 8 MR JUSTICE NICKLIN: Okay, are we ready? Can we activate
 9 the screen, please?
 10 EMPLOYEE V (sworn)
 11 MR JUSTICE NICKLIN: Right. So deactivate the screen,
 12 please, and then we'll get the public back.
 13 (Hearing in public)
 14 Examination--in--chief by MS BOLTON
 15 MS BOLTON: Good afternoon, Employee V.
 16 A. Good afternoon.
 17 Q. There should be a document in front of you at page 1713
 18 that says "First witness statement of Employee V".
 19 A. Yes, I have that.
 20 Q. If you could please turn through that document, pages of
 21 that document, and go to page 1745.
 22 A. Yes.
 23 Q. And did you sign that document?
 24 A. Yes, I did.
 25 Q. Is that document your witness statement?

1 A. Yes, it is.
 2 Q. And is that witness statement still true to the best of
 3 your knowledge and belief?
 4 A. Yes, it is.
 5 MS BOLTON: Thank you, Employee V. If you could stay there,
 6 there may be some further questions.
 7 Cross-examination by MR CURTIN
 8 MR CURTIN: Hello, Witness V. I actually find your evidence
 9 very interesting and to me perhaps it goes to the heart
 10 of the case, so I'm going to do something that I don't
 11 normally do with other witnesses. Normally I go through
 12 chronologically but with you I want to take you straight
 13 to paragraph 64.
 14 Basically, it will be my defence to defend myself
 15 against the statement you've made, that -- it's my
 16 defence that it's not the actions that I carried out
 17 that gave you the level of fear you described but your
 18 level of fear for me based on the information you had at
 19 the time. How do you feel about this, does that make
 20 any sense to you?
 21 A. Could you rephrase the question, please --
 22 Q. Yes, it's going to be my defence in this statement of
 23 the level of fear that you -- you talk of terror in
 24 relation to this particular -- ah, there's going to be
 25 one incident, I apologise if sometimes I get a bit ...

1 there's going to be -- basically your evidence against
 2 me, there's one particular incident when you came to do
 3 some work along the -- outside the fence. That seems to
 4 be the main thrust of the evidence against me; is that
 5 correct? In this statement.
 6 A. Yes.
 7 Q. And I put it to you that the level of terror that you
 8 describe, which we'll come to, was based on the
 9 reputation that went before me?
 10 A. That is correct. The reputation, your reputation, yes.
 11 Q. And it's that reputation, I put to you, that influenced
 12 you to filter what you saw and turn it into terror
 13 because my reputation is in fact an issue, and we're
 14 going to talk about it now, it's an issue with you,
 15 isn't it?
 16 A. No, I have no issues.
 17 Q. Okay. So we need to know about what your knowledge,
 18 your perceived knowledge of Mr Curtin is, because the
 19 reason I take you to this paragraph is because it seems
 20 like you've got some -- let's have a look:
 21 "The intensity of having ... (John Curtin), who
 22 I know feels so strongly against MBR's business and has
 23 been to prison for his actions in the name of animal
 24 rights, being very close to my face and abusing me for
 25 15 to 20 minutes as I carried out my job was

1 overwhelming for me. I was very distressed after this
 2 incident, and I do not like to be reminded of it."
 3 A very strong statement, yes?
 4 A. Yes.
 5 Q. And it's my job to defend myself and I'm going to put it
 6 to you constantly as we go through the videos that the
 7 levels of terror that you're reporting, I don't take --
 8 you can feel however you feel, but they're based on this
 9 reputation of me as this -- well, as this -- I would say
 10 I've become a bogeyman figure. One witness even
 11 mentioned yesterday Freddy Krueger. So that will be my
 12 case, that I've become some sort of bogeyman to the MBR
 13 workers. How does that come across to you? How does
 14 that make you -- do you agree with that, that I'm
 15 a bogeyman figure?
 16 A. I don't see you as a bogeyman figure. It's just all the
 17 information, when I researched you in the public domain,
 18 gives me lots of information on your past and present
 19 activities towards people.
 20 Q. Okay.
 21 A. And civilians.
 22 Q. Let's talk about -- remember, there's nothing wrong with
 23 researching me or anything like that. We're here to
 24 give evidence under oath. Tell the court what you have
 25 learnt -- was there any reason why you began to research

1 me or did you -- do you research as many protestors as
 2 you can once the protests began?
 3 A. When the camp was established and we found out Mr Curtin
 4 was the main person, we all went out into the public
 5 domain and researched Mr Curtin's past and present
 6 activities from, I don't like saying this, grave
 7 robbing, desecration of graves, vandalism, breaking and
 8 entering. This gave us intel, information, regarding
 9 what sort of person he was or has been at this present
 10 time.
 11 Q. So you talk about "we", so there's the protestors and --
 12 is this like a -- this is very much borne out by other
 13 witnesses that they too have researched into me. When
 14 you say "we", is that a team, there was a bit of a team
 15 effort to find out who is this Mr Curtin; is that
 16 correct?
 17 A. No. We individually went out ourselves and researched
 18 you, gained intel and information on you in the public
 19 domain. Also further down the line, we had a police
 20 seminar regarding protestors, terrorism and other
 21 activities, and information gained is only from the
 22 public domain.
 23 Q. Okay. So tell the court then about what you found out
 24 about Mr Curtin, the perceived knowledge you have based
 25 on -- is it just your internet searches? Tell the court

1 roughly, or as much as you can actually.
 2 A. My internet search in the public domain gave me
 3 decimation of graves, grave robbing, breaking and entry,
 4 attempting to decimate another grave and decapitate the
 5 head (inaudible). The information is vast. This was
 6 a year and a half ago I did all the research but since
 7 then I have --- I stopped researching after the first
 8 couple of days.
 9 Q. Why did you stop researching?
 10 A. I gained enough information on your past and present
 11 activities, giving me a basic information on what sort
 12 of person you were.
 13 Q. Yes, because I'm sure other people in this courtroom who
 14 never heard it before have said, "What did he say?
 15 Grave robbing?". Tell us about the knowledge that you
 16 have about the grave robbing. Can I remind --- did it
 17 relate to a campaign called Newchurch where there was
 18 indeed a grave desecration of the owner's mother-in-law?
 19 Does that ring a bell?
 20 A. Not --- no. When I did the original research, this was
 21 over a year and a half ago, I went through it all. Most
 22 of it I've forgotten now. I don't remember.
 23 Q. Okay but ---
 24 A. It's not this thing you've just spoken about but I do
 25 know you spent prison time regarding the desecration and

1 grave robbing.
 2 Q. And that unsettled you, as you've said, which was very
 3 unsettling, and I understand that. Yes?
 4 A. Could you repeat that again? Sorry.
 5 Q. This information that, as far as you're concerned,
 6 Mr Curtin had been --- was taking part in a grave
 7 desecration and had been imprisoned, caused you alarm
 8 and it became unsettling for you, yes?
 9 A. Yes, it's very disturbing that someone could do that.
 10 Q. And what else? You've talked of breaking in.
 11 A. Yes, breaking in other premises and intimidating people.
 12 I can't remember all the information now, this is a year
 13 and a half ago.
 14 Q. So intimidating people and there's more. What about
 15 the --- so intimidating, breaking into property. Are you
 16 aware --- is there any information to you that I'd
 17 previously had any involvement with the Wyton site?
 18 A. Yes. There was an article where --- regarding the Wyton
 19 site, one of the original break-ins.
 20 Q. So when we go back to paragraph 64, just this man who
 21 has this connection with gravedigging, that alone, this
 22 guy standing near me, that alone is enough to cause you
 23 fear. As you said, you found it overwhelming, yes?
 24 A. Yes, it caused me great fear that a person very close to
 25 my face intimidating, provoking me, goading me, I was

1 concerned that things could escalate.
 2 Q. Was it your understanding that Mr Curtin was just
 3 another protestor? Or I've been described a lot of
 4 times by workers as a ringleader. Which one? Another
 5 protestor, just one of those, or Mr Curtin in fact is,
 6 if not the ringleader, a ringleader; would that be
 7 correct?
 8 A. No, I see you as one of the main persons in charge of
 9 the protestors' camp.
 10 Q. Okay. In charge, ringleader, similar, yes?
 11 A. No, I'd just say main person, one of the main people.
 12 Q. Okay. Right. Let's go and run through the paragraph.
 13 I'll probably ask you questions for the next half
 14 an hour or so, I don't think we're going to get through
 15 it but we won't be here for a long, long time. Right.
 16 Your role:
 17 "I am in charge of maintenance on the Wyton Site
 18 ..."
 19 Yes?
 20 A. Yes, I'm in charge of the maintenance.
 21 Q. So MBR Acres, they breed, amongst the things they do,
 22 the main thing is that they breed dogs for vivisection,
 23 to supply vivisection laboratories, yes?
 24 A. I --- they breed animals for all sorts of businesses.
 25 Q. Could you expand on that, please?

1 A. That's medical research and other businesses. My
 2 knowledge is very limited regarding the dogs because
 3 I have hardly any interaction with the dogs at the
 4 kennel, due to maintenance(?).
 5 Q. But you've worked there since 2015 so let's --- so is it
 6 your understanding that the dogs --- it's you that's
 7 mentioned medical research. Is it your understanding
 8 that the only dogs --- when it comes to supplying
 9 laboratories, the only reason for that is medical
 10 research; is that your understanding?
 11 A. Yes, that's most of my understanding. As I've got no
 12 interaction hardly with the dogs, I do know they go for
 13 medical research, yes.
 14 Q. Who told you this? Has management told you this?
 15 A. No. It's common knowledge because when I joined the
 16 company many years ago, I did a little bit of research
 17 myself knowing that I was working at a dog kennels
 18 regarding medical research.
 19 Q. Okay. What about testing for, say --- we're not going to
 20 go down this road much, just your vague knowledge, what
 21 about testing for like pesticides, insecticides,
 22 chemicals, what about that? Are the dogs --- this is not
 23 important I don't think but is it your understanding
 24 that dogs are sold for those experiments, if they were
 25 to be experiments, or it's only medical research?

1 A. From what I understand, it's only medical research.
 2 Q. What about if I told you you were utterly wrong there --
 3 MR JUSTICE NICKLIN: Mr Curtin, it's not relevant whether
 4 he's right or wrong about it.
 5 MR CURTIN: Your Honour, he did say. He did say.
 6 MR JUSTICE NICKLIN: I know but you've taken it as far as
 7 you can, which is what is his awareness, and you've got
 8 it.
 9 MR CURTIN: This other business, do you want me to remind
 10 you what the other business might be or have you
 11 refreshed your memory what the other fundamental
 12 business of why Marshalls breed beagles? They're
 13 a business, they're here to make money and what else
 14 is it that they make money from? What else is it that
 15 Marshalls do, other than they breed beagles and they
 16 sell them to laboratories, what else do they do? You've
 17 been there for ten years. What else is it?
 18 A. I understand the dogs are just bred for medical
 19 research.
 20 Q. Okay. Are you aware that the company holds something
 21 called a bleeding licence?
 22 A. I have read some of the Home Office's licence
 23 guidelines. I've glimpsed at them. I didn't see
 24 a paragraph regarding bleeding, I do know there is
 25 something in there regarding this.

1 Q. You say -- it's a strange thing to glance at Home Office
 2 guidelines. I put it to you that you do know about the
 3 bleeding licence and you're being slow coming forward
 4 with the information at the moment.
 5 A. The information I got was just glimpsing at the licence.
 6 I was asked to have a look at it, which I did do, but as
 7 I said before, my interaction with the dogs is very,
 8 very limited. I just maintain --
 9 Q. Where are you -- sorry, I beg your pardon for
 10 interrupting you there. You were saying? Did
 11 I interrupt you? You said? It's too late, I apologise.
 12 Why are you, a man in charge of maintenance, being
 13 shown some Home Office guidelines on bleeding?
 14 A. When I joined the company, I was given lots of
 15 literature to read regarding the company and this is
 16 some of the things I read.
 17 Q. Okay.
 18 A. As I -- working at this site.
 19 Q. Okay, thank you. So when you go in and out of the site
 20 and have done for many, many years, but since
 21 Camp Beagle, you hear people shout things at the
 22 workers, don't you?
 23 A. Yes, we're called all sorts of names and intimidated.
 24 Q. And one of the things, one of the main chants in the
 25 evidence that Mr Curtin has shouted is "Puppy killer",

1 yes?
 2 A. Yes, you've called me and the other members of
 3 protestors have called me puppy killer too.
 4 Q. How does it feel to be called a puppy killer?
 5 A. Very disturbing, as I have nothing to do with the
 6 puppies and no inter -- I have no interaction with the
 7 puppies and I've never seen any puppies being killed on
 8 site or heard of it. It's very disturbing.
 9 Q. Do you think I should be prevented from calling you
 10 puppy killer?
 11 A. I'd like to prevent you calling me lots of names, yes,
 12 that's including one of them.
 13 Q. Okay, so I was going to say the next time I'm at the
 14 camp -- but the last time I was at the camp and you
 15 drove past I called you puppy killer. Now I'm going to
 16 give you my rationale for that and see what you think.
 17 So you work at MBR Acres, you're the maintenance man.
 18 So we've -- and I fully -- I can fully believe that
 19 you've never seen a puppy being killed. Let me put it
 20 this way, there's no blood on your hands, is there?
 21 A. I've never seen any puppies being killed on site or
 22 heard of anyone doing it. I know you use that as a term
 23 of intimidation, "blood on your hands", we get that
 24 taunted at us when we leave site.
 25 Q. So it's my case that you work for a company that

1 supplies animals for experiments which I take massive
 2 exception to, and it's also a company that sells dogs'
 3 blood. Now, I am horrified at that and as a result of
 4 that I hold all the workers equally responsible that go
 5 inside MBR for being in different degrees but I'd say
 6 you're all responsible for the bleeding of puppies or
 7 dogs to death. How does that make you feel? Do you
 8 think it's unfair?
 9 A. I have nothing to do with what you're saying. I'm just
 10 the maintenance so I don't understand why you're trying
 11 to put all of this on me.
 12 Q. Okay. I put it to you that when you receive your wage
 13 packet, there is no blood on your hands but it would be
 14 my case that you earn literally blood money, which is
 15 a very strong thing to say. How does that make you
 16 feel?
 17 A. When I receive my wage, unfortunately, I've got
 18 a mortgage to pay and bills and I haven't got the luxury
 19 of not working and I don't see it as blood money.
 20 Unfortunately, it's money to survive and live with.
 21 Q. Okay. I think -- so are you aware of -- did you see
 22 the -- are you aware that there was a Daily Mirror
 23 article yesterday about Marshalls yet again, and this
 24 time it was about you flying dogs into the country from
 25 US for experiments? Are you aware of that yesterday?

1 A. No, sorry, I don't read the papers. I'm not aware of
 2 this article .
 3 Q. Okay. Would you take it from me that there was such an
 4 article yesterday and in fact it's one of many articles,
 5 there has been --- especially in the time of Camp Beagle,
 6 MBR Acres has appeared in the media a lot of times in
 7 controversial circumstances. Would you accept that?
 8 A. I do understand that the company has been in the media
 9 spotlight from various stuff (?) that have gone out in
 10 the public domain occasionally.
 11 Q. Okay.
 12 A. But most of the time I've --- because I'm only there to
 13 do the maintenance, I'm not really interested in what
 14 goes on outside. I'm just interested in maintaining my
 15 site for the dogs.
 16 Q. I understand. I'm just putting to you, are you aware
 17 that there's a --- we can't do a numbers game, but
 18 a sizeable number of people, a sizeable percentage of
 19 the people who live in this country that would be
 20 horrified that, one, puppies are bred to be experimented
 21 on and, two, horrified that there's a company that
 22 bleeds dogs to death. Would you accept that there is ---
 23 it's not just Mr Curtin, there are a large number of
 24 people that would have a similar point of view to that.
 25 Would you accept that?

1 A. No, I wouldn't, because a lot of the media is --- things
 2 are sensationalised and untrue. With some of the
 3 information you're giving me, it's untrue.
 4 Q. Okay, we're not going to be able to go into --- this
 5 isn't going to be a debate about the rights and wrongs
 6 of what you do. I just want you to accept that --- all
 7 right, what about this? There are a large number ---
 8 Daily Mirror printed an article yesterday. Millions of
 9 people probably read it. And of those, whether it's
 10 true or not, whether it's tabloid, but there will be
 11 a large number of people who believe what they read in
 12 that newspaper and as a result of that they were
 13 horrified, would you accept that?
 14 A. No, until I've read the article I'm not going to
 15 comment. Sorry.
 16 Q. Okay. So is it your evidence that you've got no real
 17 knowledge at all of the fact that vivisection is
 18 a massive controversial issue and it causes deeply held
 19 opinions, especially on the anti-vivisection side. Are
 20 you not even aware of that? Do you keep yourself away
 21 so much that you're not even aware of that?
 22 A. Vivisection, I know it exists because it's been on some
 23 of the information regarding you, but I'm not
 24 interested. I'm only interested in maintaining the
 25 site. I don't always believe what I read or see on the

1 media regarding your actions as well as other companies.
 2 Q. So I'm just asking you, here's a scenario. Someone has
 3 read some information in the national press, they've
 4 looked at Camp Beagle, they've come down to the gates
 5 and they're horrified about the bleeding licence and
 6 every single car that goes in they shout at them "Puppy
 7 killer". These people, including myself, would not be
 8 particularly interested in who actually kills the puppy,
 9 they'd hold you all generally responsible. Do you
 10 accept that such a point of view can be taken as that by
 11 somebody else? Not you but by somebody else.
 12 A. I accept that everyone has their own opinion.
 13 Q. And that someone else could find you --- in fact it's not
 14 a case of like individual responsibility, by working at
 15 MBR Acres you all have --- you have a collective
 16 responsibility --- there is a collective responsibility .
 17 Once you go to work for that company, you need to ---
 18 I would say you have to accept that other people are
 19 going to hold you responsible for animal cruelty. They
 20 may be right and they may be wrong, but do you accept
 21 that this scenario happens, that there are people who
 22 are going to hold you --- forget about you as an
 23 individual as such, but you as a worker at MBR Acres are
 24 just as guilty as the ones with blood on their hands,
 25 you're all culpable?

1 A. I'll repeat myself. I accept that everyone has their
 2 own opinions.
 3 Q. Okay.
 4 MR JUSTICE NICKLIN: Can I ask, Employee V, do you
 5 understand why the protestors are there?
 6 A. Yes, I do. I do understand. They are protesting for
 7 their views on what goes on in the industry.
 8 MR JUSTICE NICKLIN: Okay, thank you.
 9 MR CURTIN: Paragraph 7, do you have paragraph 7?
 10 A. Yes, I have it in front of me now.
 11 Q. Simple question:
 12 "During the summer of 2021, the protests outside the
 13 Wyton Site became more intense, and it was not possible
 14 to enter ..."
 15 Did you make your statement off your own free will?
 16 A. Please give me a moment to read this through.
 17 Q. Just the first sentence.
 18 "... it was not possible to enter or exit the Wyton
 19 Site safely."
 20 Have you read that?
 21 A. I'm reading it now. Please bear with me.
 22 Q. Sorry, yes. It was just the first sentence I'm going to
 23 ask you about really.
 24 A. Yes, carry on.
 25 Q. Did you make this statement of your own free will and of

1 your own free choice? Are these the words that you
 2 chose to put in your statement?
 3 A. Most of these are my own free words. I had some help
 4 regarding my English and to rephrase things. I've had
 5 help, yes, but most of this is my statement. It's
 6 helped --- been helped here to word --- I use the word
 7 "proper English".
 8 Q. Okay. So apart from helping you with proper English,
 9 which I understand, were you prompted to say anything by
 10 the people who were helping with the English? Did they
 11 prompt you to say any -- to give any extra content into
 12 the statement that you might not have otherwise given?
 13 A. Not this statement. I don't remember. This statement
 14 was given a long time ago.
 15 Q. Paragraph 7, you talk about going in and out of the site
 16 is really frightening. And you include in that
 17 frightening experience people slowly walking in front of
 18 the convoy. Would you find that frightening, people
 19 walking slowly in front of you? It's frightening?
 20 A. On paragraph 7, it doesn't mention anything about people
 21 walking in front of me. Is that in another paragraph?
 22 Q. No, it says:
 23 "Accessing and exiting the Wyton Site during the
 24 spring, summer and autumn of 2021 was, however, a really
 25 frightening experience, with protestors surrounding my

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1 vehicle on a daily basis and often blocking or slow
 2 walking in front of the convoy of staff cars ..."
 3 A. I think I might be on the wrong paragraph --
 4 Q. Paragraph 7.
 5 A. I've gone back to the front of my book. Paragraph 7.
 6 Q. Of your statement.
 7 MS BOLTON: My Lord, if I may assist, it's page 1714.
 8 A. That's why. I'm on the wrong page, I do apologise.
 9 MR CURTIN: No problem. Happens to me all the time.
 10 A. Ah, thank you. I do apologise. I've gone back to it,
 11 gone back, sorry.
 12 MR JUSTICE NICKLIN: You may need to ask the question again
 13 now, Mr Curtin.
 14 MR CURTIN: You talked about your views, I've underlined the
 15 word "frightening", and then you go on to list some of
 16 the things that you found frightening about going in and
 17 out of work. One of them -- well, protestors
 18 surrounding the cars "and often blocking or slow walking
 19 in front of the ... cars ... and shouting abuse at me".
 20 A. Yes, that's what's happened.
 21 Q. Okay. If people are shouting abuse at you, I imagine
 22 you find that frightening, but we -- it's my case that
 23 the reason that people are shouting things like "Puppy
 24 killer" is because you work in MBR. It's not personal.
 25 It's normally not personal in the vast majority of

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1 cases. Would you accept that? It's not personal but
 2 it's against you as a MBR worker?
 3 A. No, I see it as personal. I'm sorry, they're directed
 4 at you, they're actually right up at the window shouting
 5 at you, I see it as personal.
 6 Q. That's fine. It's up to you to see it. I'm just
 7 challenging that. Especially when you know that the
 8 people behind you and the people in front of you get
 9 shouted at very similar things.
 10 A. Yes, they do get shouted at.
 11 Q. And the people slow walking in front of the convoy,
 12 do you still want to include that as frightening?
 13 A. Yes, because when they're around the car, they're
 14 knocking on the windows and doors, you have no idea how
 15 frightening that is, especially when some of them are so
 16 angry and some of the death threats that have been put
 17 on the internet, what they're going to do to the staff,
 18 it does get very worrying when the car is surrounded.
 19 There's a lot of angry people out there.
 20 Q. Okay. So it's a combination. It's when there's slow
 21 walking and you feel like you're surrounded and then the
 22 added death threats, that's when it becomes frightening,
 23 yes?
 24 A. Yes, also the knocking on the windows, bending the
 25 mirrors, trying to open the doors.

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1 Q. Have you had that happen to you?
 2 A. Yes, I have. When I've had my car surrounded, they're
 3 knocking on the door, trying to open the doors and
 4 bending the wing mirrors.
 5 Q. It's just that that's not featured in your witness
 6 statement.
 7 A. No, but I've mentioned how terrifying things were.
 8 Q. Okay. Paragraph 9 you talk about you're worried that
 9 the protestors may target the house.
 10 A. Yes, that's correct. I have had other members or my
 11 colleagues that have had their house targeted. They've
 12 had them spray-painted, vandalised.
 13 Q. Yes.
 14 A. It's concerning that someone is going to come round and
 15 with some of the death threats they put on the internet,
 16 you don't know what sort of person could visit my house.
 17 Q. Yes, I understand that. So of your fear level, of the
 18 scale, would it be that the thought of you, your family
 19 or your house being attacked would be at the top of your
 20 fear level, yes? That would be literally the worst case
 21 scenario; is that correct?
 22 A. No, it isn't. I fear being -- having my car
 23 smashed while being outside the site. I had the fear of
 24 when you were intimidating me when I was repairing the
 25 wire. And then I've got the fear of the house being

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1 attacked. And then I've also got the fear of some of
 2 the staff members who have been abused in the street.
 3 It's a terrible, terrible fear.
 4 Q. Okay. Another witness has stated that, like you, they
 5 have a similar level of fear. I put the scenario. So
 6 me, we'll come to the incident in a minute, the fact
 7 that I'm next to you and close to you would bring you
 8 a similar -- would it bring you a similar level of fear
 9 than if I was to be, along with some other people,
 10 outside of your house shouting at night--time? Is it
 11 connected to the point where it's just one lot of fear
 12 or are there levels of fear?
 13 A. One sort of fear, that would be you on your own or
 14 a load of people.
 15 Q. So me outside your house at night--time would be -- for
 16 you would be terrifying, and me having an interaction
 17 with you whilst you're working outside -- would that be
 18 a similar level of fear to you, in my case?
 19 A. Yes, it would. Especially when you're right up beside
 20 my face, a couple of millimetres away from me last time
 21 when I was repairing the fence.
 22 Q. Yes. We'll come to that. A couple more questions --
 23 literally one or two and then we can deal with the
 24 video.
 25 Paragraph 18, you talk about concealing your

1 identity and that can be unpleasant and uncomfortable,
 2 yes?
 3 A. Yes, that's correct.
 4 Q. You're a man who, from your own evidence, you like to
 5 keep yourself to yourself, don't you? That's the
 6 impression I'm gathering.
 7 A. I work in my parameters at work. I do interact with the
 8 staff when they need me. But most of the time I work
 9 with -- within myself, yes.
 10 Q. So in your case, prior to Camp Beagle, you were at
 11 some -- you're in a pub or you're in a party or some
 12 social setting, you get talking to a stranger and they
 13 ask you, "Where do you work?", what would your reply be?
 14 A. Now my reply would be very different due to the hatred
 15 that's been put on the internet and the intimidation,
 16 death threats. I say I work somewhere different.
 17 Q. You're saying now. What about if someone had asked you
 18 the same question two years ago?
 19 A. Close friends --
 20 Q. No, no, no, no. I'm talking a stranger. Someone in
 21 a shop, someone at a bar, someone at a party, "All right
 22 mate, blah blah blah, nice day, isn't it? What are you
 23 up to? Where do you work?" What would your answer be?
 24 A. My answer would be now just maintenance. I wouldn't
 25 give them where I work.

1 Q. I asked you the question was like say two years ago,
 2 three years ago, five years ago, ten years ago.
 3 MR JUSTICE NICKLIN: Well, they may be different answers.
 4 MR CURTIN: I apologise.
 5 Previous to camp -- two years ago, what would your
 6 answer have been? You're talking to someone, you don't
 7 know who they are. You've got no idea and they ask you
 8 where you work. What would your answer -- think about
 9 it, and you're on oath, what would your answer be?
 10 A. I'd very carefully answer it. Sometimes I'd tell the
 11 truth, sometimes I would change my job title.
 12 Q. How far would you go? Another witness said -- they gave
 13 two options, a kennel assistant or "I work at Tesco's".
 14 Have you done similar things?
 15 A. No, I just keep it in the field of maintenance.
 16 Q. Just to make sure, that would be -- now you'd
 17 definitely -- but this was the case also, wasn't it, two
 18 years ago, to a stranger?
 19 A. No, I would say three years ago to a stranger I'd be
 20 quite honest. But now, after all the interaction of
 21 protestors and misinformation being spread, I have to be
 22 very careful where I work now for my own safety and my
 23 family's safety.
 24 Q. Okay, are you sure about that answer? You know you've
 25 done a lot of internet research. Do you know about the

1 Huntingdon campaign that happened in the early 2000s?
 2 A. Yes, somebody has mentioned it to me but I don't know
 3 about the campaign to -- I've read a little article but,
 4 as you said, that's over two years ago. I don't
 5 remember all what I've read.
 6 Q. I put to you you've got some awareness of the nearly ten
 7 years you've been working there, you're involved in
 8 a controversial industry, there's always been animal
 9 rights people around. But you gave various -- I just
 10 want to simplify this point before we break, that two
 11 years ago, some stranger comes up to you, "Where do you
 12 work?", you're telling me now -- what would the answer
 13 have been two -- now you're saying -- I understand since
 14 the camp because you've personally witnessed all these
 15 things, you're absolutely going to just say
 16 "Maintenance", you're tight-lipped. Two years ago,
 17 someone comes up to you, a stranger, "Where do you
 18 work?", give me the answer that you would have given two
 19 years ago. You said -- I want to know the answer. What
 20 would you have said, two years ago?
 21 A. I'm going to have to change that. Three years ago
 22 I would have told the truth, but since the campaign
 23 started and it's become more -- with more misinformation
 24 on the internet and death threats and other things going
 25 on, I give a different answer now.

1 Q. Okay, so three years ago, someone comes up to you at
 2 a party, "Where do you work?", you say "I work at
 3 MBR Acres where we breed dogs for experiments and we
 4 also, you know what, sometimes ---"
 5 MR JUSTICE NICKLIN: Mr Curtin, you're now way out of the
 6 area. Okay? You're asking about what he might say at
 7 a party. He might answer --- he said truthfully, three
 8 years ago he might have said he worked at MBR Acres. He
 9 didn't go on to say ---
 10 MR CURTIN: He said truthfully, he said truthfully ---
 11 I won't answer that then, how would he have put it?
 12 MR JUSTICE NICKLIN: Why does it matter? What are you going
 13 to say to me at the end of the trial that matters about
 14 this?
 15 MR CURTIN: My case is he would have always hidden his
 16 identity from people.
 17 MR JUSTICE NICKLIN: And if you're right about that, what
 18 difference does it make?
 19 MR CURTIN: That the camp has not added --- has aggravated
 20 that but it hasn't created it. There was already
 21 a position where this man was hiding away, I would say
 22 hiding away in terms of not being candid for a simple
 23 question like that.
 24 MR JUSTICE NICKLIN: Then you've got a problem because he's
 25 positively answered that three years ago, he would have

1 told the truth about his job.
 2 MR CURTIN: Can I ask one more question on that then?
 3 So three years ago, we're at a social setting, what
 4 would your answer have been? You said you'd be more ---
 5 give me the words, "All right mate, how you doing, blah
 6 blah blah, where do you work then?" Tell me three years
 7 ago what the answer would have been.
 8 A. I would have told them the truth where I worked.
 9 Q. What's that? What's the answer? You can't tell them
 10 the truth. What's the --- I ask you, "All right mate,
 11 where do you work?" What's the words that come out of
 12 your mouth?
 13 A. I would have said MBR, Wyton. That's what I used to
 14 say.
 15 Q. Okay. And if they ask you, "What's that then? What's
 16 that all about? Where's that?"
 17 A. I'd be --- I'd tell them the truth. It was the dog
 18 kennels, the breeding facility.
 19 Q. Would you have offered the fact that they were going to
 20 be sent to laboratories ---
 21 MR JUSTICE NICKLIN: Oh, Mr Curtin.
 22 MR CURTIN: Okay, I'm prepared ---
 23 MR JUSTICE NICKLIN: You're not getting --- you're making the
 24 situation worse for yourself because you've now got
 25 a worse answer than you had first of all. It's not

1 going to be an important area of the case.
 2 MR CURTIN: No.
 3 MR JUSTICE NICKLIN: And you're not going to put provocative
 4 questions to the witness about --- because they're
 5 unreal, what you're putting to him.
 6 MR CURTIN: Okay, I'll move on.
 7 MR JUSTICE NICKLIN: Right. It's time for lunch now. We'll
 8 come back at 2.10.
 9 (1.08 pm)
 10 (The short adjournment)
 11 (2.08 pm)
 12 JUDGE: Right. Okay, Mr Curtin.
 13 MR CURTIN: Okay. Can I take you to paragraph 20, please?
 14 A. Just to clarify that, is that on page 1716?
 15 MR JUSTICE NICKLIN: It is, yes.
 16 A. Thank you.
 17 MR CURTIN: The second sentence:
 18 "The protestors distribute footage and pictures of
 19 us and our cars on the internet, and specifically ask
 20 those viewing the content to identify staff members."
 21 Yes?
 22 A. Yes, that's correct. I've seen that on the internet
 23 before it gets taken off.
 24 Q. Okay, so I'm not denying that you may have seen such
 25 things. What about --- are you aware that Camp Beagle

1 has some social media? Camp Beagle Facebook and
 2 Camp Beagle Instagram.
 3 A. Yes, I am aware but I have no social media accounts.
 4 I just rely on some of the information given to me by
 5 other members of staff.
 6 Q. Okay. So sort of second-hand information?
 7 A. Most of the time I ask not to be told because it really
 8 doesn't interest me.
 9 Q. Okay. If I were to put it to you that on Camp Beagle
 10 social media and Facebook social media, there has never
 11 been any attempt to identify workers or to pick them out
 12 or to make it personal in any way towards any worker,
 13 how would you understand that? Would you accept that?
 14 A. I accept that on Camp Beagle they do put bits asking
 15 where staff live, they put their registration numbers,
 16 and I have seen names go on there. From other members
 17 of staff they've shown me because they've captured the
 18 screen and then reported to Facebook and Instagram that
 19 they're asking people to --- I'm going to word it the way
 20 they word it --- hunt us down.
 21 Q. Okay. But you gather this from the evidence of other
 22 people. This is information gained by work colleagues
 23 who show you, "Here you are, look what I saw on
 24 Camp Beagle last night?"
 25 A. No, I haven't seen any articles for a long time because

1 I haven't -- I've asked not to be shown them.
 2 Q. Okay. I'm just trying to get this straight. You're
 3 telling me that you've seen screenshots that have been
 4 shown to you by workers. Is it right that you haven't
 5 got social media so what you're about to answer about
 6 your knowledge of social media is based on from your
 7 work colleagues, is that correct?
 8 A. Yes, but I haven't had any information given to me for
 9 a long time because I've asked not to.
 10 Q. Okay, but the information you were given on the past, so
 11 anything -- if I was to ask you about Camp Beagle social
 12 media, it would be second-hand information based on what
 13 your work colleagues have told you, what they saw?
 14 A. Yes, that's correct, second-hand information.
 15 Q. So in that case I don't think it's worth pursuing that
 16 because you haven't seen it yourself. Do you
 17 understand? So I'll move on.
 18 Paragraph 21, you talked about Bethany Mayflower
 19 meeting -- approaching Dave Manning, Dave Manning having
 20 his door painted, Employee L having something happen at
 21 their house and paint, Employee K and Q, Employee F and
 22 Dave Manning having letters from funeral companies.
 23 You're not suggesting in any way, are you, that I'm
 24 responsible for those actions in this witness statement?
 25 A. I can't answer that. I have no idea what you do off

1 site. But I do know of all the activities down there.
 2 Q. Yes. Now, paragraph 22, you mention Mel Broughton,
 3 Bethany Mayflower, John Curtin, Michael Maher and
 4 Pauline Hodson, then you go on to say -- it's as if you
 5 draw a distinction between the five people you've
 6 mentioned and the others, because you say:
 7 "There are other protestors ... who I recognise ...
 8 but who are just making their views known, and not doing
 9 anything especially 'wrong' ..."
 10 Is it your case that the people you've identified
 11 there are the ones that do things wrong and the others
 12 don't?
 13 A. I've identified them in two ways, non-peaceful
 14 protestors and -- protestors. As I've said,
 15 non-peaceful protestors and peaceful -- intimidating,
 16 violent and abusive.
 17 Q. I would come into the second category, is it?
 18 A. You would come in, yes, the category of intimidation.
 19 Q. I don't know how much is based on my actions but
 20 certainly from what you think you know about my past,
 21 that's always a factor here, the Curtin factor, about my
 22 past, yes?
 23 A. That is one of the criteria, yes. Your past is part of
 24 you, yes.
 25 Q. Okay. Paragraph 23, we've discussed this earlier. This

1 is similar -- remember at the very beginning, we talked
 2 about your knowledge. What I didn't ask then was about
 3 this -- the idea of the police meeting, do you remember
 4 you talked about the police coming to address workers?
 5 A. Yes. The police came to site, give us the seminar
 6 regarding peaceful protests, non-peaceful protests and
 7 terrorism acts. And some of the things, what to do and
 8 what to do regarding certain situations.
 9 Q. Was it the police who drew those distinctions? So you
 10 have peaceful protestors and extremists -- would the
 11 police lay out that sort of -- would you say they laid
 12 that sort of plan out for you? There's peaceful
 13 protestors who offer one kind of scenario but then
 14 there's these others. Is it the police who drew those
 15 distinctions? Perfectly rational distinctions.
 16 A. The seminar was a training seminar. It went from
 17 peaceful to non-peaceful. It was all basic information
 18 which we could obtain from the public domain and how
 19 things worked from any website, they just came to talk
 20 to us.
 21 Q. Yes. Did the police mention my name, John Curtin?
 22 A. No, we mentioned your name and they give us information
 23 which we already knew from the public domain.
 24 Q. What information did the police give you, whether you
 25 knew it or not? What information did the police give

1 you about myself?
 2 A. Same as what I said before, I can repeat it. Decimation
 3 of graves, gravedigging, breaking and entry. I mean,
 4 it's a long time ago, the seminar, but it was just all
 5 the basic information which I'd obtained already from
 6 the public domain.
 7 MR JUSTICE NICKLIN: When you say that it was a long time
 8 ago, can you remember roughly when it was?
 9 A. I would say over a year ago. A year and a couple of
 10 months. It's a long time ago.
 11 MR JUSTICE NICKLIN: Were the police officers from
 12 Cambridgeshire Police or some other force?
 13 A. I can't remember that. I'm sorry.
 14 MR JUSTICE NICKLIN: That's all right.
 15 A. They were from a force, this is before the temporary
 16 court injunction came in I think.
 17 MR JUSTICE NICKLIN: All right.
 18 A. That's all I can remember.
 19 MR JUSTICE NICKLIN: But you do have a recollection of the
 20 police talking about individuals like Mr Curtin?
 21 A. His name was mentioned, but that's because we asked
 22 questions regarding Mr Curtin. I can't remember, we
 23 just asked odd questions. And it was basically the same
 24 information that we'd already pulled off the public
 25 domain. It was only a short amount of questions.

1 I can't remember what was said now.
 2 MR JUSTICE NICKLIN: Can you remember how many officers were
 3 present?
 4 A. I think two officers were present.
 5 MR JUSTICE NICKLIN: Right. Thank you very much.
 6 MR CURTIN: Could the same be said about Mel Broughton? Did
 7 the police mention Mel Broughton to you or was that
 8 another question asked by the workers?
 9 A. I'm sure his name was mentioned but, again, I can't
 10 remember again. It's such a long time ago.
 11 Q. I've forgot where I am myself now.
 12 MR JUSTICE NICKLIN: You'd just dealt with 22.
 13 MR CURTIN: Okay, did they talk about, say, the campaign
 14 that had happened some 20 years before, Huntingdon Life
 15 Sciences?
 16 A. You know, I'll be honest, I can't remember.
 17 Q. Okay. Was the campaign -- I think I asked you before if
 18 you were aware of it. Let's say there was lots of quite
 19 militant illegal activities, targeted -- a campaign of
 20 targeted attacks on individuals, attacks on property,
 21 a campaign that encouraged personal attacks and illegal
 22 activities. Did the police talk of previous campaigns
 23 in those terms, that there had been such similar
 24 campaigns in the past?
 25 A. I am aware of the campaigns but I can't remember if that

1 was through staff members, my knowledge looking on the
 2 internet. I can't remember.
 3 Q. Did you feel -- after the police talk was given, do you
 4 remember any colleagues -- any conversations with your
 5 colleagues about the general conclusions that, if
 6 I could broadly say, members of staff had drawn from
 7 that police seminar? Roughly, you know, roughly, was
 8 there something that was drawn from that seminar
 9 collectively by the workers? I know you can't talk on
 10 behalf of them collectively but I'm just asking for your
 11 opinion.
 12 A. The seminar was very good I thought. It give us an
 13 insight on how things worked and what to expect. It
 14 reassured us.
 15 Q. And involved in that reassurance, did the police talk
 16 about protestors involved in animal rights can be
 17 extremely passionate and agitated and be very loud and
 18 passionate, but on the whole non-violent in their
 19 actions? Did the police address you about that or was
 20 it only about the militant actions?
 21 A. I honestly can't remember it. It was just basically
 22 going through the basics of a peaceful protest all the
 23 way up to terrorist acts.
 24 Q. Was the idea perhaps of talking about peaceful protests
 25 to perhaps on that occasion allay your fears, chill out,

1 you're working at a controversial place, animal rights
 2 people know about you, you might as well learn to live
 3 with it, and the fact that there are peaceful
 4 protestors, it's just going to be one of those things
 5 that you have to put up with. Was there anything along
 6 those lines from the police?
 7 A. No, I don't remember that. I just remember parts of the
 8 seminar going through all the basics.
 9 Q. Okay.
 10 MR JUSTICE NICKLIN: What did you find that was reassuring
 11 about what the police said?
 12 A. Of how things have been dealt with, how things have
 13 improved over the years compared to the past. So it
 14 reassured us because at one point things were getting
 15 quite frightening due to what was happening to some of
 16 the members of staff and us. That was the reassuring
 17 part.
 18 MR CURTIN: Did the police give you some reassurance that in
 19 the past, when there had been extreme activities, there
 20 had been a clamp-down and they'd been given lengthy
 21 prison sentences and that had sort of dealt with the
 22 issue; is that the sort of reassurance you're talking
 23 about?
 24 A. No, I don't -- I remember parts of the seminar including
 25 you and Mel Broughton and other members had been put in

1 prison for their actions, and that's all I remember.
 2 Q. Okay. But after the meeting, did you feel less nervous
 3 or more nervous?
 4 A. I actually felt the same, in between, at the time.
 5 Q. Right. Moving on. We're now going to go to -- there's
 6 three videos that I need to get you to look at. Right.
 7 Can I have video 253, please. 8.01.47. I think we can
 8 just play it.
 9 Now, before we play it, again this is -- have you
 10 got it?
 11 A. The video has come up on my screen. Which paragraph is
 12 this referenced to, please?
 13 Q. 32. Do you have it?
 14 A. Yes, I do, thank you. I'm just reading it now.
 15 Q. I invite you to look at the bottom left-hand corner,
 16 a man in a yellow-orangey jacket, next to two police
 17 officers. I suggest that's me. Would you confirm that
 18 from your understanding?
 19 A. If it's the General Post Office jacket that you used to
 20 wear, I'm sure that's you, yes.
 21 Q. Yes. Just from saying that alone, the Post Office
 22 jacket, you know, you clearly remember things I wear
 23 et cetera, don't you?
 24 A. Yes, I do.
 25 Q. Why is that? Why do you remember me?

1 A. I remember lots of things, but you stand out the most
 2 because you're mainly one of the main people there.
 3 Q. Do you remember any other item of clothing over the
 4 whole time that you've been at Camp Beagle that you can
 5 remember anyone else wearing?
 6 A. I can remember some of the other protestors wearing
 7 certain items of clothing, yes. But ---
 8 Q. Such as? Give me one. Give me one example of one item
 9 of clothing that you remember from another protestor.
 10 A. Another fluorescent jacket. There is --- some of the
 11 other protestors wear other fluorescent jackets. Until
 12 I'm shown the videos, as I said, I try and not get too
 13 involved in things but certain things stick out.
 14 Q. Okay. I'm going to play this video now and I invite you
 15 to look at it with --- my defence about this video would
 16 be that I'm there, for sure, I don't deny that, but I'm
 17 actually facilitating, helping to facilitate, using my
 18 experience, the actual passage of the vehicles. There's
 19 going to be --- I don't remember this particular video,
 20 haven't watched it today --- some shouting, some
 21 delaying, but protest is going to happen and also
 22 workers are going to come in and out, and I would
 23 actually say I'm helping the procedure as opposed to
 24 disrupting the affair. Let's watch the video and then
 25 I'll ask you the same question. I may not watch all of

1 the video. We'll see. If we can play some of the
 2 video, please.
 3 (Video played)
 4 How long is it? Can we skip the video to when the
 5 cars start to come in? A little bit.
 6 MS BOLTON: 52 seconds.
 7 MR CURTIN: Here we go.
 8 (Video played)
 9 Let's stop there. Immediately, again, there's
 10 a protestor in front that's impeding the cars, yes?
 11 A. Yes, that's correct.
 12 Q. And Mr Curtin is sitting back --- standing back watching.
 13 If we can carry on playing ---
 14 A. (Inaudible - overspeaking).
 15 Q. --- playing the video.
 16 (Video played)
 17 Can we stop there? Can I take you to the last
 18 sentence, paragraph 32:
 19 "As a result of D11 [which is me] (John Curtin) ...
 20 [and] (Amanda James) and the other protestors standing
 21 in the Access Road, I was not able to freely pass ...
 22 the Access Road ..."
 23 The sentence before that:
 24 "... (John Curtin) and ... (Amanda James) stood in
 25 front of my car ... almost halfway across the Access

1 Road so that there was only a narrow gap for my car to
 2 drive through ..."
 3 That's myself with the jacket and I put it to you
 4 that's Amanda James standing behind me. Watch as the
 5 vehicles go in.
 6 (Video played)
 7 Okay, if we can stop the video there. You can see
 8 there's a number of cars still to come but I've watched
 9 that video, and it's not in your evidence, that this is
 10 the scenario you're talking about where Mr Curtin and
 11 Amanda James, yes, we're standing there but there's
 12 plenty of gap, I would say, and Mr Curtin is not
 13 blocking --- hasn't blocked the road at any point. I'm
 14 not going to show any more video but so far Mr Curtin
 15 has not blocked the road, would you accept that?
 16 A. I'll accept two parts of that. Where you were standing
 17 originally you were blocking the road and then you moved
 18 out the way. So you had the first protestor in front
 19 blocking, you were the second back-up with Amanda James,
 20 and then you moved out the way. You moved to the side.
 21 As I observed that from the video, you've moved to the
 22 left. But you were originally in front of the gate.
 23 Q. No, I wasn't. I've never gone --- this is the closest
 24 I've gone to the gate. I'll tell you what I'm going to
 25 do, I'm content with your evidence so far. Let's go on

1 to the next video, okay?
 2 A. Okay.
 3 Q. Video 724 at 16.00.56.
 4 A. What page is this?
 5 Q. Sorry, this is paragraph 33, 34, 35, 36, 37, 38.
 6 A. Okay, thank you.
 7 Q. Play the video.
 8 (Video played)
 9 Okay, stop. You see the policeman? With his
 10 arms ---
 11 A. Yes, I see --- you've moved before --- you were standing
 12 in front, then you moved behind the policeman.
 13 Q. I have. You're correct, I've slightly shuffled back.
 14 You're correct. That's me, Mr Curtin, standing in the
 15 driveway, yes?
 16 A. Yes.
 17 Q. Okay. Let's carry on.
 18 (Video played)
 19 Hold on a sec.
 20 I beg your pardon, carry on, sorry, I apologise.
 21 (Video played)
 22 Okay, stop the video there. I just wanted to show
 23 the video. You've mentioned me, and the claimant
 24 solicitor, MBR's solicitors, have pointed out a relevant
 25 timestamp and I put it to you that that was my entire ---

1 not my entire involvement, that was my involvement in
 2 this incident and I indeed did not block your car. My
 3 case would be that I am there and, as viewed from my
 4 experience, I am facilitating protesting whilst also the
 5 passage of the vehicles in and out. Would you accept
 6 that or would you reject that?
 7 A. The first thing I'm going to say is originally you were
 8 standing in the front and then as you worded it, you
 9 shuffled back and you stood to the left and that's where
 10 you are now.
 11 Q. Okay, yes. I accept there's a little shuffle back.
 12 We're talking perhaps centimetres, yes, I accept there
 13 was a little shuffle back. At no point has Mr Curtin
 14 obviously sat in front of a car or "You shall not pass".
 15 Mr Curtin is standing at the side and he continues to
 16 stand at the side for the remainder of the — you don't
 17 need to — well, if I was to stop playing the video
 18 there and just accept that Mr Curtin is now at the side
 19 of the road and the vehicles are passing in and out and
 20 there are police officers, a number of them, present.
 21 A. I accept that you've moved from the middle of the road
 22 to where you are now, as you shuffled back, and now
 23 you're standing on the side.
 24 Q. Can we go back to where he said middle of the road, just
 25 a few seconds. All right, let's go back to look at

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1 where I'm in the middle of the road then, since you
 2 mention it. Can you go back a bit?
 3 When — so am I in the middle of the road now?
 4 A. You're in the middle now. I can see you in the middle
 5 now.
 6 Q. That's me in the middle. That doesn't — I don't want
 7 to be — well, I do want to be pedantic. That's not the
 8 middle of the road.
 9 A. Okay it's just off the middle then. Before you shuffled
 10 back.
 11 Q. Yes, it is just off the middle.
 12 MS BOLTON: Are you putting paragraph 32 to him?
 13 MR JUSTICE NICKLIN: No, we're on to 33, 34 now.
 14 MS BOLTON: I know but we've started with paragraph 32 and
 15 paragraph 32 is a different video because it's 8 o'clock
 16 in the morning, not 4 o'clock in the afternoon.
 17 MR JUSTICE NICKLIN: I think we know that.
 18 MS BOLTON: I just wanted to make sure that we're not —
 19 because I understood Mr Curtin read out on this video to
 20 the witness about the description in 32, so I'm just —
 21 MR CURTIN: Ah, I was mistaken when I said — I don't know.
 22 MS BOLTON: Sorry, that's what I'm just clarifying and it's
 23 just a point of clarification, my Lord. I think there
 24 was a bit of confusion there.
 25 MR CURTIN: I'll tell you what, that's your evidence, that

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1 I'm standing in the middle of the road there, that's me
 2 blocking the road, according to you, isn't it?
 3 A. Where I see the picture now, yes, you are blocking the
 4 road.
 5 Q. Okay. Right, let's move on. Would you accept this —
 6 leave the video there. Would you accept that as you're
 7 coming in and out of work, the protestors seem to be
 8 acting in unison? There's some obstruction but there's
 9 balance being weighed. Certainly in this video there is
 10 no kicking of cars and no stamping. There's no overtly
 11 illegal activities. And the protestors kind of are all
 12 singing off the same hymn sheet and the police seem to
 13 be kind of on the same hymn sheet too. Would you accept
 14 that?
 15 A. No, I see that as obstruction of us trying to come in
 16 and go out of work.
 17 Q. Undoubtedly there's some level of obstruction but
 18 there's also a protest taking place, isn't there? So
 19 the two are coming together here. There's a difference
 20 between a blockade, "You shall not pass"; this isn't
 21 a blockade, is it? This is more of a protest I would
 22 say.
 23 A. I would word it as a temporary blockade because you're
 24 obstructing us and the police have to shuffle everyone
 25 out the way.

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1 Q. Yes, I would accept there is a temporary obstruction.
 2 Right. Let's move on to paragraph 58. Yes?
 3 A. Yes, I'm on paragraph 58.
 4 Q. Ah, sorry, I do apologise. I've got one question to ask
 5 you in relation to that last incident. But we haven't
 6 watched the whole thing. In relation to me, on that
 7 day, you said:
 8 "As a result, I was intimidated and scared by the
 9 protestors standing so close to my car."
 10 Were you intimidated and scared by me that day
 11 during that demonstration?
 12 A. I can only answer that in one way. I know you were
 13 there and I am worried when you're there what
 14 instructions you could be giving to the other members of
 15 the protest.
 16 Q. Yes. That's the sort of fear process that goes through
 17 your head, yes?
 18 A. Yes, that's correct.
 19 Q. Let's move on to paragraph 58. Yes?
 20 A. Yes, I'm there now.
 21 Q. And this is perhaps the — for me, it's the most
 22 important part of your evidence. In fact you also
 23 agree, you say this incident, relating to 8 July, was
 24 particularly upsetting for you?
 25 A. Yes, it was.

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1 Q. We're going to watch that video. It's 20 minutes in
 2 length. I'm hoping we can skip through some of the bits
 3 but we'll have to see how we get on. But through the
 4 whole duration of this video, this is what I have to put
 5 to you and I'd like to see what you have to say before
 6 the video and then I'll ask you again afterwards. We're
 7 in ---
 8 A. Would you like me to answer the first part that you just
 9 said or ---
 10 Q. No.
 11 A. --- speak to you after the video?
 12 Q. I haven't asked you anything yet.
 13 A. Okay.
 14 Q. I'm hoping I can say this. This is a civil court but it
 15 is a court. Imagine if that was a criminal case because
 16 in this, if I take you to paragraph 62:
 17 " ... (John Curtin) harassed, abused and threatened
 18 me."
 19 Yes?
 20 A. Yes.
 21 Q. If true, those are illegal activities, yes?
 22 A. It's been carefully worded here. If we watch the video,
 23 you'll see you're harassing me ---
 24 Q. I know.
 25 A. --- abusing me and intimidating me.

1 Q. I know about --- I'm sure you've carefully worded it but
 2 I want to ask you a question before we watch it. If
 3 this was a criminal prosecution and I was a defendant,
 4 I'm telling you I would plead not guilty, absolutely not
 5 guilty on the basis that at no point am I seen in this
 6 video harassing, abusing or threatening you. I would
 7 ask the case to be --- if this was a prosecution case
 8 against me, halfway through the case, I could get an
 9 opportunity after the prosecution has finished to say,
 10 "You must drop this case because there is no evidence".
 11 What would you say to that, before we watch the video?
 12 A. I'd say you need to watch the video.
 13 Q. Okay, let's watch it then. Now, if you can, between us,
 14 but you'd have to --- I don't think you could possibly
 15 trust me though under these circumstances, but if I ask
 16 to put the video forward --- in fact I'm in charge of it
 17 but if you're against putting the video forward at any
 18 point in case you think I'm trying to hide anything,
 19 then do speak out, please. Yes?
 20 A. Okay.
 21 Q. So if we can go to video 175.
 22 If we can do a bit of skipping --- yes, let's watch
 23 it because it's the start of the video.
 24 (Video played)
 25 Stop. I put to you that whether you've got access

1 to social media or not, you know that Mr Curtin
 2 regularly, maybe on a daily basis, for nearly two years,
 3 has made livestreams and has made a lot of broadcasts on
 4 Facebook, yes?
 5 A. I do know you make livestreams because sometimes, when
 6 I enter work, I drive past you at the fence and I know
 7 when we had this altercation down the side of the fence,
 8 it was livestreamed because other members of staff said
 9 "Have you watched it?" and I said "No".
 10 Q. Okay, so you knew it was a live --- in fact it is
 11 a livestream and I'm inviting you to put that into
 12 account, that sometimes there would be times when
 13 I would be addressing you, sometimes the security guard
 14 and then at other times I'm addressing the audience who
 15 are watching the livestream, yes?
 16 A. Yes, I know there's a lot of people involved here, yes.
 17 Q. Excellent. All right. Let's watch a little bit of the
 18 video.
 19 (Video played)
 20 So could we stop it there? Just to give a general
 21 introduction, I've said "Hello, anybody out there?",
 22 I imagine you could hear it but there's no response from
 23 you or the security guard; is that correct?
 24 A. Yes, there's no response. We were told not to interact
 25 with you.

1 Q. You've been told. By management?
 2 A. I've been told by lots of information, from management,
 3 police seminars, not to interact.
 4 Q. So the police also told you not to interact, yes?
 5 A. Yes, that was one of the things, I'm sure. I'm sure
 6 that was said in the seminar. We've been told by
 7 various sources not to interact in any way.
 8 Q. Can you think of any other sources, apart from the
 9 management and the police, who have given you this
 10 advice?
 11 A. No.
 12 Q. Okay. You're going down to do some work, yes?
 13 A. I'm going to repair the holes cut in the fences by the
 14 protestors.
 15 Q. So you're going to fix the holes done by --- again, you
 16 say protestors. A short while before this, I'm not
 17 quite sure how many days or ... there had been
 18 a break-in at the site and Animal Rebellion protestors
 19 had come and they came and they'd taken away five dogs,
 20 yes?
 21 A. I know there was a break-in and that's all I remember.
 22 Q. In fact I did it myself just what you do, I said
 23 Animal Rebellion protestors. For you, is it fair to
 24 say, when you cast this net, that those people who broke
 25 in are just generic protestors? These protestors, they

1 break in and they protest? It's the same sort of
 2 people, yes?
 3 A. Just all I know, it was protestors that broke in.
 4 That's all I know.
 5 Q. Okay. Is it an unusual thing for you to work on this
 6 side of the fence?
 7 A. I've worked on this side of the fence, both sides,
 8 checking and repairing stuff in the past, yes.
 9 Q. Just as far as I'm aware, as far as I can remember, this
 10 is the one and only time, and it would be my evidence,
 11 in the 22 months, it would be the only time I've ever
 12 seen an MBR worker down the side of the field. Would
 13 I be correct in that?
 14 A. I've worked on the other side of the fence many times
 15 before the protestors arrived (?), repairing things and
 16 checking things, yes. But this is a --
 17 Q. Okay, but since the protest began, this was a unique
 18 event, you could say, a very unusual event?
 19 A. No, I've actually been out a couple of times before that
 20 and repaired the fence when the protestors were there
 21 but this was the only time that someone engaged with me.
 22 Q. Okay. Were you sent there by -- were you given this job
 23 by a member of the management?
 24 A. I was asked by management to repair the holes and
 25 I agreed to it.

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1 Q. Okay. All right. Let's carry on watching the video.
 2 Ah -- sorry, back to this thing where you have been out
 3 a number of times. Are you telling me that you've come
 4 out the front gates, walked down and did protestors see
 5 you walking outside the gate and take no action or
 6 do you think it was the fact that, if you had been
 7 outside before, you weren't seen? Which one?
 8 A. I've been outside and I haven't been seen because
 9 usually when you walk out the front, at certain times of
 10 the day, there's nobody standing out there so I just
 11 walked round, repaired, repaired what I had to repair
 12 and walked back and no one was the wiser.
 13 Q. Were you nervous? Were you ever nervous about --
 14 A. Yes, I'm always nervous with what's been given to us,
 15 death threats and other things, yes, I am nervous.
 16 Q. Because prior to this there's a fence --
 17 A. Prior to this, prior to this -- I haven't done any more
 18 repairs since our altercation.
 19 Q. Yes, we'll come to that. You mention that in your
 20 sentence -- in your witness statement, we can come to
 21 that. But prior to this, it's like there's always been
 22 a fence between me and you or at least a car door
 23 between me and you; is that correct?
 24 A. Yes, there's always been a fence or a car door or you've
 25 been at a very far distance.

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1 Q. Okay. Paragraph 61, you said:
 2 "[Mr] Curtin was constantly in my personal space
 3 during this incident ... [and] was constantly attempting
 4 to provoke me ..."
 5 If you could stop the video at any time and tell us
 6 when the provoking comes. We'll come to the personal
 7 space but if you could stop at any points, say "Stop
 8 there, that was the bit where he provoked me", that
 9 would be helpful. Do you understand?
 10 A. Yes, I understand.
 11 Q. Okay.
 12 (Video played)
 13 MS BOLTON: If it helps, the timestamps are in the witness
 14 statement in paragraph 62.
 15 MR CURTIN: Yes, I think because it's such an important film
 16 we're going to try to -- let's -- yes.
 17 (Video played)
 18 Can we stop there? We will get to the end of this
 19 video, I tell you. Now, I invite you -- there's three
 20 people involved in this. There's me, you and this
 21 security guard here, yes?
 22 A. Yes, that's correct, three people.
 23 Q. A man known to the protestors as Rambo, do you know
 24 that?
 25 A. I have heard someone nickname -- talking about the

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1 protestors have nicknames in Rambo.
 2 Q. Unlike other workers, Rambo has lots of close encounters
 3 with protestors. Being a security guard, he goes round
 4 the fence a lot, he's outside in the morning and the
 5 evening, he's someone that protestors have met before
 6 close upfront and I think you can -- it would be fair to
 7 say you can detect a certain tension between me and
 8 Rambo. He's a man known to the protestors who smiles
 9 and dances when the puppy vans are going out. I just
 10 invite you to -- if there's tension here in this
 11 situation, which undoubtedly there is, I would guide you
 12 to bear that in mind. For example, this particular
 13 exchange here, "Don't touch me", it's between me and him
 14 as opposed to me and you, that's all.
 15 A. You use that same tactic on me further on down the line
 16 about personal space I think. I can't remember. I've
 17 only watched this video once a long time ago.
 18 Q. So you see this, me, I'm walking along, filming, making
 19 a livestream. This, for you, is my tactic, is it?
 20 A. I see this as your tactic, as part of a protestor, to
 21 get in people's personal space, to delay them as much as
 22 possible in what they're doing.
 23 Q. Okay. Let's watch the video.
 24 (Video played)
 25 Okay, stop there. I would accept -- I fully accept

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1 that that's the first comment I've put to you, "Hello,
 2 anybody in there", would you accept that? This is
 3 our -- that's an attempt by me to contact you?
 4 A. You had the first bit about the personal space, but this
 5 is the second, but again I'm focused on my work.
 6 Q. Yes, and you heard "Hello"? I'm just trying to help us
 7 along, "Hello, is there anybody --" do you accept that's
 8 me trying to get some sort of reaction from you
 9 actually?
 10 A. Yes, I accept that's attention, yes, you want my
 11 attention.
 12 Q. Would you class that as me provoking you, "Hello, is
 13 there anybody in there"?
 14 A. Not yet, no.
 15 MR JUSTICE NICKLIN: Mr Curtin, it's going to take a very
 16 long time with a 20-minute video if we're going to watch
 17 it in five-second chunks, okay? I suspect the overall
 18 impact of this video comes from just watching it. Now,
 19 you've got plenty of time at the end to ask whatever
 20 questions you want. If you want to note down timecodes
 21 you want to go back to, fair enough. And equally, if
 22 there's something really, really important that you want
 23 to draw the witness' attention to, then that's fine, you
 24 can stop the video. But we can't go through this video
 25 in five-second chunks.

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1 MR CURTIN: Okay. I can think of one area where I need to
 2 stop it but you're correct, and I'm trying to facilitate
 3 the court and I was worried about the whole length but
 4 it's an important video.
 5 MR JUSTICE NICKLIN: I see that, but it may be better for us
 6 just to watch it.
 7 MR CURTIN: I think that's a great idea and I'm guided by
 8 you.
 9 (Video played)
 10 Can I stop there? I do that for a deliberate
 11 reason. Yes?
 12 A. Can you repeat that again, sorry? I've got my
 13 headphones on.
 14 Q. I was talking to the -- yes, I just asked the man with
 15 the video to stop it. I just ask you to look at the
 16 scene we're about to go into. You've gone to the fence
 17 and I'm about to stand near you, and I would put it I'd
 18 say to the right of this there's two very narrow trunks
 19 of a sapling. But the thing I wanted to draw the
 20 court's attention to was a very -- it's a gap in the
 21 hedge and we're talking of -- down in a ditch and it's
 22 a restricted space that me, you and another person are
 23 about to go into. That's all I was about -- I don't
 24 need a comment from you particularly, I just wanted to
 25 remind the court so we can go along.

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1 (Video played)
 2 My Lord, can I pause the video? Not as a wind-up.
 3 I did invite the witness, and I will try not to say
 4 another word, if he can intervene where -- that was the
 5 bit I was on about where -- "provoking me". If he can
 6 flag up that's a provoking or intimidating bit, that
 7 would be helpful.
 8 MS BOLTON: It's in the witness' statement with timestamps.
 9 MR CURTIN: I know. As we're watching it.
 10 MR JUSTICE NICKLIN: Ms Bolton, that's the equivalent of
 11 leading, okay?
 12 MS BOLTON: My Lord, it is there. If Mr Curtin is asking
 13 where, it's there.
 14 MR JUSTICE NICKLIN: You do appreciate, Ms Bolton, that one
 15 of the purposes of cross-examination is to try and
 16 undermine the witness' evidence.
 17 MS BOLTON: My Lord, I apologise.
 18 MR JUSTICE NICKLIN: You appreciate that?
 19 MS BOLTON: I'm not trying to undermine anything, my Lord.
 20 I'm simply saying that if Mr Curtin is not sure where it
 21 is, it's in the statement. That was all I was saying.
 22 I'm not trying to do any more than that.
 23 MR JUSTICE NICKLIN: It's for Mr Curtin to conduct his
 24 cross-examination. He's asked a perfectly reasonable
 25 question which is to ask the witness to identify the

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1 minutes in the video where he feels he's being provoked.
 2 MS BOLTON: My Lord, I -- apologise.
 3 MR JUSTICE NICKLIN: All right?
 4 Right. Carry on, Mr Curtin.
 5 MR CURTIN: Play.
 6 (Video played)
 7 If we could stop the video now. I feel no reason to
 8 watch the rest of the video because there's no real
 9 interaction of any intimacy between me and -- I don't
 10 think I address the worker. So that would be a good
 11 place to stop perhaps for the --
 12 MR JUSTICE NICKLIN: Okay. Sure.
 13 MR CURTIN: I do fully intend to finish by 4 o'clock.
 14 MR JUSTICE NICKLIN: Right. We'll come back at 3.25.
 15 (3.09 pm)
 16 (A short break)
 17 (3.25 pm)
 18 MR JUSTICE NICKLIN: Right, Mr Curtin.
 19 MR CURTIN: Hello, Witness V. Are you there? Hello, is
 20 there anybody out there? Hello, Witness V? Houston, we
 21 have a problem.
 22 Hello, Witness V.
 23 A. Yes, I'm here. Sorry, the mike has just come on, sorry.
 24 MR JUSTICE NICKLIN: It's all right.
 25 MR CURTIN: Excellent. Did you understand before the video

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1 was played, at some point I said could you interfere at
 2 the bits you're talking about being provoked or
 3 intimidated? There are some bits in your statement that
 4 I'll come to but is there any reason why you didn't stop
 5 the video?
 6 A. No, I wanted to watch it through to refresh myself
 7 because I --- this is the second time I've watched the
 8 video.
 9 Q. Okay. I understand that. Right. Let's go through the
 10 bits that you've identified then. Hopefully we won't
 11 have to play them again because I don't dispute:
 12 "We are going to do our darndest to make sure some
 13 workers go to prison from here you deserve it you really
 14 do deserve it."
 15 Yes?
 16 A. That's ---
 17 Q. You've said:
 18 "This upset me, as I do not do anything illegal."
 19 A. That's correct. I'm just the maintenance man who works
 20 at the kennels. We're Home Office licensed, we don't do
 21 anything illegal. So that upset me immensely.
 22 Q. Yes, because as far as you're concerned, we needn't
 23 really be there, we shouldn't be there, everything is
 24 fine, this place is well run, well regulated, the dogs
 25 are --- well, I'm putting words in your mouth there.

1 There's no need for any protestors maybe, would that be
 2 your case?
 3 A. Well, yes. I should be left alone to do my work on
 4 site.
 5 Q. Okay. Let's go back to 62.1. Now, what I've said, we
 6 want "to make sure some workers go to prison". I didn't
 7 say you should go to prison.
 8 A. Okay, that's what it implied.
 9 Q. "This upset me, as I do not do anything illegal."
 10 Then there's a bit on the video after this, which
 11 I've not played, where I remind you, "Are you aware of
 12 this company's history?". Are you aware that MBR has
 13 a criminal history? Are you aware of that?
 14 MR JUSTICE NICKLIN: Mr Curtin, you need to be --- you
 15 recognise that MBR has divisions and so this English
 16 company, I don't think --- I think you're referring to
 17 the Italian case.
 18 MR CURTIN: Yes.
 19 MR JUSTICE NICKLIN: That's a different company. It's
 20 a company in the same group but it's a different
 21 company.
 22 MR CURTIN: Are you aware that there has ever been
 23 a prosecution of Marshall in relation to animal cruelty
 24 allegations? Are you aware of any criminal history of
 25 the staff of your parent company? Are you aware of such

1 thing?
 2 A. No, I'm not. I didn't know anything.
 3 Q. Did I help to inform you on that day that, indeed, there
 4 is a criminal past of the company?
 5 A. No, I didn't, I didn't --- I wasn't always listening to
 6 you. I was trying to get on with my work. But I didn't
 7 know the other parts of the company have had anything
 8 against them. This is new to me.
 9 Q. Okay. If I was to tell you that is true, and so my
 10 comment there that you found intimidating was indeed
 11 a sincere aim and belief that, if we were able to
 12 pile --- if we were able to draw a file together we could
 13 indeed get some of the workers from MBR Acres
 14 imprisoned, why did you take that personally? Or why
 15 did you find it frightening?
 16 A. The way you were intimidating, I've done nothing illegal
 17 and I know none of my work colleagues have done nothing
 18 illegal because we're licensed under the Home Office and
 19 I haven't seen anything untoward.
 20 Q. Okay. You said you weren't listening to everything
 21 I said and you didn't hear --- I said "some workers".
 22 Did you miss me saying that or did you think it was
 23 relating to you?
 24 A. I thought it was relating to me.
 25 Q. Okay.

1 "How low can you go working here?"
 2 I put to you that's a question. It's not a very
 3 nice question but it's a question.
 4 A. Unfortunately, as I've said in the past, I've got to
 5 work because I've got bills to pay and a family to feed
 6 and other things and I haven't got the --- and I enjoy
 7 the work that I do, maintenance.
 8 Q. Okay. And we've gathered that there are people who ---
 9 there's a section of society in this country that would
 10 actually look down upon the work that you do, not the
 11 fact that you're a maintenance man, but the fact that
 12 you work for this company. You're aware that there's
 13 a sizeable proportion of the country that would share my
 14 opinion about this, as a low job, working for MBR.
 15 Do you accept that?
 16 A. I accept that the protestors would say that but I don't
 17 accept anyone else would because I'm working.
 18 MR JUSTICE NICKLIN: Mr Curtin, you're not going to agree
 19 about that. It's back into the area where you don't
 20 need to get agreement.
 21 MR CURTIN: I understand.
 22 62.3, I think we'll play it. It's a very, very
 23 short bit, I think it's worth playing it. 175, at 10
 24 minutes 25 seconds. I'm just going to show a brief
 25 clip, we've already watched it. I look at the camera,

1 so 10.25, and I say "Let's have a look at what the
 2 people are saying. I've already invited them to write
 3 their comments, which they're always doing anyway, and
 4 I'm going to read them". And one of those comments was
 5 something along the line of "They're freaks" and I read
 6 that out to you. Watch the clip and see.
 7 (Video played)
 8 Stop there. Did you hear that?
 9 A. Yes, I heard that. That's your personal opinion and
 10 everyone else's personal opinion.
 11 MR JUSTICE NICKLIN: Did you appreciate at the time that
 12 Mr Curtin was livestreaming this, from what he'd said to
 13 you?
 14 A. It's very upsetting calling me a freak when, again, I'm
 15 only working, just doing a normal job.
 16 MR JUSTICE NICKLIN: I appreciate that. I'm just asking
 17 you, when this was happening and Mr Curtin was filming
 18 you, were you aware at the time that he was at the same
 19 time broadcasting it?
 20 A. Yes, I knew he was broadcasting it, yes. I sussed that
 21 out sort of a bit more further along down the line.
 22 MR JUSTICE NICKLIN: Yes. So what that little clip,
 23 Mr Curtin was reading out comments that he'd received as
 24 a result of broadcasting the footage and one of the
 25 people watching had decided to post a comment "Freaks",

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1 and Mr Curtin then repeats the comments that he'd
 2 received.
 3 A. Yes, I understand that. It did upset me, yes.
 4 Q. 62.4, 62.5, you talk of how close I was to you and you
 5 had some fear that I was going to pull down your face
 6 mask, yes?
 7 A. Yes, at one point in the video, as you can see, you got
 8 very close to my hat and, as I wasn't reacting to any of
 9 your comments as you tried to intimidate even the
 10 security guard and abuse us in specific ways on the
 11 livestream, I was getting very worried at one point
 12 where you might react because I haven't reacted and
 13 maybe do something silly. So that's when I made the
 14 decision to stop what I was doing. I signalled the
 15 security guard and said "Let's leave", because I was
 16 worried about you becoming more agitated.
 17 Q. Well, that's not in your statement that as a result of
 18 this you finished your work. But at this late point --
 19 A. In my statement it says I felt really threatened and
 20 uncomfortable. That is -- I could have reworded that to
 21 agitated and uncomfortable --
 22 Q. Okay -- sorry, I apologise. Do you want to carry on?
 23 I interrupted you, sorry.
 24 A. That's all right. No, I've just worded it slightly
 25 different from my statement as it means the same thing,

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1 threatened and uncomfortable. I felt insecure and it
 2 was time to leave.
 3 Q. Okay. I put it to you that the video that we've all
 4 watched was a livestream by me where I talked in terms
 5 of the smell, the dogs crying, the fact that the dogs
 6 don't get out, these dogs just want to play with a ball,
 7 but they get nothing. I talked about 74 outreaches.
 8 I talked about the FBI, when they're looking for serial
 9 killers, go looking for people who either enjoy cruelty
 10 or don't enjoy cruelty. I go into a whole load of
 11 things. I'm making a livestream. At no point did
 12 I actually interfere with your work and you carried on
 13 working. I made no physical or verbal commands to you
 14 or threats to you, "You should stop working", is that
 15 right?
 16 A. No. You intensified your livestream to intimidate me.
 17 You got very close to me. I do agree you did not touch
 18 me, but at one point you became very close and you did
 19 everything possible to slow my work down. So that was
 20 when I made the decision, on the second repair, to leave
 21 site.
 22 Q. Okay. Would you accept that in both areas when you were
 23 connecting the fence, we're all down in the ditch, in
 24 a little gap in the hedge, we weren't out in a wide open
 25 space. By the nature itself, the actual space that the

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1 three of us were in was a confined space. Would you
 2 accept that small point?
 3 A. Yes, it was confined and at one point I wish you had
 4 stepped further back from me. You had been very close
 5 to me.
 6 Q. 63:
 7 "I believe ... (John Curtin) was trying to get
 8 a reaction from me by frightening and abusing me."
 9 At which point did I frighten you?
 10 A. When you became very close to me and tried to enter my
 11 personal space.
 12 Q. Okay, which --
 13 A. And at the end, when I hadn't reacted to you, I could
 14 see you becoming more agitated, so that was when
 15 I decided to move on.
 16 Q. Okay. We've already talked about paragraph 64 where
 17 your previous knowledge, previous perceived knowledge of
 18 me. It's my case to you that that had an overwhelming,
 19 overpowering effect on you and every single interaction
 20 myself and you will ever have will be --
 21 A. Yes, it did.
 22 Q. Yes, it will be what?
 23 A. Yes, it did have an overwhelming effect on me. It
 24 frightened me that day that you could get so close to
 25 me.

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1 Q. No.
 2 A. Intimidate me and provoke me.
 3 Q. Yes, the point I put to you was all the things you'd
 4 heard about me, from the police, from other work
 5 colleagues, from your own thing, gravedigging, prisons,
 6 all the other gossip about me, that this had an
 7 overwhelming effect on you. So any interaction with
 8 Mr Curtin would cause you some trouble, would cause you
 9 anxiety, would cause you to be frightened, any
 10 interaction. Would that be fair?
 11 A. No. First thing, I didn't gossip about you. It's just
 12 information we gained on you, intel.
 13 Q. Okay.
 14 A. And the second thing is it's my personal opinion of you.
 15 Q. Based on the intel you got?
 16 A. Yes, the intel off the internet.
 17 Q. You know me, don't you, really? You've got me sussed
 18 out, haven't you?
 19 A. Unfortunately I'm not a trained psychologist. I've only
 20 got a basic commonsense view of you.
 21 Q. Okay. Paragraph 64, only one thing I've got to say
 22 about it. You said I was very close to your face and
 23 abusing you for 15 to 20 minutes. Well, the only time
 24 I was near you was when we were down by the ditch. That
 25 entire — the portion we just watched was just over ten

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1 minutes long. There's another number of minutes where
 2 you're walking away. It's not true that throughout that
 3 entire time, throughout an entire 15/20 minutes. I put
 4 to you it was only a matter of a few minutes once you
 5 were by the fence; would that be correct?
 6 A. The way I perceive close is a couple of metres to
 7 a couple of centimetres away from my head. That's how
 8 I perceive close.
 9 Q. Okay, paragraph 65. We're motoring through now.
 10 "After this incident, I have refused to go outside
 11 of the Wyton Site to undertake repairs. This experience
 12 with ... (John Curtin), which was very unsettling ...
 13 has harmed my mental health ..."
 14 Yes?
 15 A. Yes, it has worried me immensely, as I didn't react to
 16 you, that there could be repercussions from the
 17 protestors, including you.
 18 Q. I put it to you, imagine some scenario where we're in
 19 the local Tesco's, there's a Tesco's just a couple of
 20 miles away from the site, imagine me behind you in the
 21 queue, or you in front of me, we meet each other. That
 22 just meeting Mr Curtin in some aspect away from — and
 23 there's no fence between us, I put it to you that you'd
 24 find it very unsettling just to have any interaction
 25 with me; is that correct?

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1 A. First thing, I wouldn't meet you in Tesco's and, yes, it
 2 would worry me. If I met you in person, I would walk
 3 away.
 4 Q. Hopefully I can handle this sensitively but it is
 5 evidence against me and I have to defend myself. You've
 6 called me disturbed and you were beginning to go on to
 7 psychologist then:
 8 " ... which was very unsettling and has harmed my
 9 mental health ... "
 10 Yes?
 11 A. I'm just trying to find where it says in my statement
 12 I called you disturbed. I don't see that there.
 13 Q. No, you've called me disturbed during your testimony.
 14 Let's go back to 65, the first or second sentence:
 15 "This experience with [me] ... has harmed [your]
 16 mental health ... "
 17 Yes?
 18 A. Yes, it has. It has worried me.
 19 Q. Later on in that thing:
 20 "... and I found the interaction with ...
 21 (John Curtin) terrifying. The experience will stay with
 22 me for a very long time."
 23 A. That's correct, yes.
 24 Q. Now, Witness V, the place you work at is an extremely
 25 controversial place. People have very, very, very

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1 strong opinions about this work. Some people do,
 2 don't they?
 3 A. Only the protestors have strong opinions of where
 4 I work.
 5 Q. I put it to you your work conditions with the protestors
 6 are extremely challenging. In fact it's the only place
 7 in Britain, it's the only puppy factory where they breed
 8 beagles for experiments and bleed dogs to death in the
 9 country, it's unique.
 10 A. I don't believe that. I've read somewhere there are
 11 other companies that breed beagles too.
 12 Q. Okay. But I'm going — I'm trying to — my basic point
 13 is, yes, I accept that your experience that day for you
 14 you found very unsettling. When it comes to harming
 15 your mental health though, I'm suggesting — I don't
 16 know — God knows — I wouldn't begin to suggest
 17 anything about your mental health history because
 18 I don't know, but just the fact of working in this place
 19 would put a strain on anybody. Would you accept that?
 20 A. I'll accept one thing. If you weren't there, I would
 21 have no worries about anything. I would have no
 22 terrifying experience if you and the protestors weren't
 23 there.
 24 Q. Okay. As I was arriving in court today, a court
 25 official said, "You were here all last week and this

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1 week, what are you here for?" and I said, "The beagle
 2 case". He knew about it and he said, "Oh, does that
 3 still go on? What a shame". It's controversial, the
 4 place where you work, and this impact on your mental
 5 health it's my case to you was not based -- this
 6 incident which unsettled you may have triggered you, but
 7 I would suggest to you it's a very complicated situation
 8 about your mental health. Would you agree with that?
 9 A. I don't know what we're talking about my mental
 10 health --
 11 Q. You're talking about your mental health, not me.
 12 A. No, I said you have affected me with this incident we
 13 had at -- the altercation at the fence and the
 14 protestors has affected me.
 15 Q. You felt degraded. Sorry, paragraph 66:
 16 "I think this was a reaction [again you talk about
 17 your mental health] to feeling so vulnerable (ie without
 18 a fence or car between me and ... (John Curtin) and
 19 feeling degraded by not being able to retaliate or
 20 respond, as we have been advised by the police."
 21 Yes?
 22 A. I felt very worried when you were in close proximity of
 23 me, yes. Very, very, very worried.
 24 Q. Again, paragraph 82, the effects on you, and this is
 25 about you. You've said:

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1 "The intimidation tactics of the Defendants, and the
 2 constant incidents that I experience when entering and
 3 exiting the Wyton Site, have slowly destroyed me
 4 inside."
 5 A. Yes, it has affected me. It has affected me internally,
 6 all the abuse that I have to take for working, coming
 7 into and from work and the protestors, the continuous
 8 intimidation tactics, the abuse, threatening and
 9 violence, death threats, yes, I think it would affect
 10 anyone here in the court if they had this constant.
 11 Q. Yes, I would never challenge something like -- but
 12 you're not suggesting that I have sent you death
 13 threats, and apart from this incident and the others
 14 where I've been on the road protesting, your witness
 15 statement sets out your full case against me but are you
 16 suggesting that I -- that I have -- well, this is your
 17 case, isn't it, that this incident with me, that -- did
 18 you find it intimidating?
 19 A. Yes, I found it very intimidating. I have to look at
 20 things realistically. You're one of the main leaders of
 21 the camp, you advise everyone on their tactics, and
 22 I accept that that's your prerogative.
 23 Q. So I advise everyone on their tactics. This is all
 24 based on your intel, yes?
 25 A. No, it's not all intel. It's just basic knowledge as in

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1 what I watch occasionally and what I've seen in the
 2 past.
 3 Q. Okay. Again, 86:
 4 "As the protestors seem to be very fanatical in
 5 their beliefs ..."
 6 What about the court official I met this morning?
 7 Would he come and do your thing as a protestor, a man
 8 who was like, "You what, they still do that? Yes, it's
 9 sickening". Is he a protestor?
 10 A. I can't comment on that because I wasn't there when you
 11 spoke to the court official and I don't know which court
 12 official it was.
 13 Q. Okay. 86:
 14 "... I am constantly worried that [people] might
 15 throw themselves or projectiles at my car."
 16 A. That is correct, yes. It has happened in the past to
 17 other members of staff.
 18 Q. Have the police ever told you about a tactic where
 19 demonstrators throw themselves in front of cars on
 20 purpose?
 21 A. Well, we were advised that one of their main tactics is
 22 to jump in front of the cars to obtain our name and car
 23 insurance so they can obtain our identities.
 24 Q. That's from the police, yes?
 25 A. That's from the police and from the internet, I've read

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1 some of the tactics used.
 2 Q. On your intel?
 3 A. Yes, my intel and information from the internet, the
 4 public domain.
 5 Q. Let's go on to -- we're nearly there, you'll be relieved
 6 to hear. Paragraph 89, you refer:
 7 "Every day, twice a day, I hear chants calling me
 8 a puppy killer or murderer, which is untrue. I find it
 9 upsetting that the protestors perceive and portray me as
 10 someone that kills animals, as it is not true."
 11 Do you remember the earlier conversation we had?
 12 Yes, you're a maintenance man but there are other people
 13 that believe that by you working for this company, you
 14 become complicit. Do you understand that point? I know
 15 you don't like it but do you understand that other
 16 people can hold that opinion? That they find you --
 17 A. People have their own --
 18 Q. I apologise.
 19 A. People have their own opinions on what they want to
 20 believe. I still find it disturbing because I've never
 21 killed any puppies and I've never seen it happen.
 22 I still find it very disturbing.
 23 Q. Okay. Paragraph 90:
 24 "It breaks my heart and is traumatising to listen to
 25 twice a day."

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1 A. Yes, it does. It's very upsetting.
 2 Q. Does it give you -- we just heard -- we could hear the
 3 dogs in the background. Talking about breaking hearts,
 4 does it ever disturb you to listen to the cries of those
 5 dogs that you hear constantly while -- has it ever
 6 affected you in any emotional way to hear the noise of
 7 those dogs that you've never even seen?
 8 A. Working at the kennels I hear the dogs all day. I've
 9 worked at a pig farm and I've heard the pigs all day.
 10 I've worked at a cow farm and heard the cows all day.
 11 It's just a normal sound of hearing animals in the
 12 kennels.
 13 Q. But I put it to you it's not normal. It's not normal to
 14 keep dogs where they never see the sky, they never feel
 15 a drop -- they're the only dogs that I know of that are
 16 intentionally confined 24 hours a day. You use the term
 17 "normal", I put it to you that you do not work in
 18 a normal dogs kennels?
 19 MR JUSTICE NICKLIN: Again, Mr Curtin, you're crossing the
 20 line again now. You're trying to persuade the witness
 21 to think what he does -- he's told you what his answer
 22 is.
 23 MR CURTIN: Yes. 91:
 24 "The protestors [there we go again] shout things
 25 such as 'we know who you are' ..."

1 Is it your case that Mr Curtin has set out to
 2 specifically identify you?
 3 A. I listen to the protestors, what they say, "We know who
 4 you are", but that's one of the intimidation tactics.
 5 Unfortunately, I don't know if that's true or false, if
 6 they know who I am.
 7 Q. You talk about -- 93 -- you "feel on edge if I travel
 8 into a town or a city" because you could be targeted by
 9 protestors, yes?
 10 A. Yes, that's correct. Because some of the other members
 11 of staff have been targeted by protestors when going
 12 into large towns and that worries me.
 13 Q. So these protestors, it must mean it's not just the few
 14 that are outside the gates, there's lots and lots of
 15 these protestors scattered all over the country, yes?
 16 A. I agree there are some of them from the gate and some
 17 around the country who gather information on us and look
 18 for us.
 19 Q. Okay, this is from your intel again, yes?
 20 A. Information in the public domain and being shown some of
 21 the articles on the Facebook and Instagram, "Hunt these
 22 people down, find out who they are, do you recognise
 23 this person?" and the picture goes on, it gets copied,
 24 and then that -- and then before it gets taken down.
 25 Q. Okay. Paragraph 95, I ask you to read this. Perhaps

1 read the four lines, if you could. And bear in mind
 2 what you told me about three years ago you would have
 3 just told someone, "I work at MBR Acres". Read the four
 4 lines and see -- what have you got to say?
 5 A. I've read the article. What's the question now?
 6 Q. This is before -- you just said "before", we don't know
 7 when, someone saw a Marshall logo and they asked you
 8 about it and even then you decided to be -- in the words
 9 of Margaret Thatcher, you decided to be economical with
 10 the truth; is that correct?
 11 A. Reading this, this is when the protestors turned up and
 12 people started getting leaflets. As I said before,
 13 three years before I would quite honestly openly tell
 14 people where I worked. But now, due to all the
 15 misinformation and propaganda, I'm frightened for my
 16 life and my family's life.
 17 Q. Okay, but let's read what you've put in your witness
 18 statement:
 19 "On one occasion, before the protests in spring 2021
 20 ..."
 21 Then you go on to relay the incident, so you were
 22 economical with the truth. Is it a mistake? You said:
 23 "On one occasion, before the protests ..."
 24 Is that a mistake?
 25 A. That must be.

1 Q. All right. Paragraph 96, you talk about neighbours
 2 putting --
 3 MR JUSTICE NICKLIN: Sorry, before we leave that then.
 4 Employee V, paragraph 95 of your witness statement
 5 says this:
 6 "On one occasion, before the protests in spring
 7 2021, while I was living at my previous home,
 8 a neighbour saw the 'Marshall' logo on my clothing and
 9 asked me why I was working there. In this situation, to
 10 protect myself, I stated I worked at a different
 11 Marshall company, not connected to MBR."
 12 Now, if you don't think that's accurate, what part
 13 of that is not accurate?
 14 A. I've just read through it again and it's come back to me
 15 now. It was one of my neighbours who asked me, "Is that
 16 the Marshalls down the road?" and I said, "No, it's the
 17 Marshall car people", and then nothing else was said.
 18 MR JUSTICE NICKLIN: Okay. But perhaps -- Mr Curtin's point
 19 is that when you say this happened, you say in your
 20 statement "before the protests in spring 2021".
 21 A. So I'm trying to remember. It's a lot -- I can't
 22 remember all this, I'm so sorry, it's got a bit
 23 confusing now. I just remember the neighbour but
 24 I might have got the dates mixed up. I'm ...
 25 MR JUSTICE NICKLIN: Okay.

1 A. I can't remember. I'm so sorry.
 2 MR JUSTICE NICKLIN: It's all right.
 3 MR CURTIN: Right. 97, I won't labour the point but is there
 4 another reason, apart from these protestors that are
 5 everywhere looking for you, is there another reason why
 6 perhaps you're economical with the truth about your job
 7 with — in the new area you are with your new friends,
 8 in case somebody has read yesterday's Daily Mirror and
 9 they might form a negative point of view that you work
 10 there? Is that one of the reasons why you're now so
 11 careful or is it only because of these activisty
 12 protestors that are looking for you?
 13 A. I can't answer that because I still haven't read this
 14 Mirror article so I really can't answer that. I'm
 15 sorry.
 16 Q. Okay, I'll move on. A similar point — no, not similar.
 17 Paragraph 101, you found a sticker near your house, yes?
 18 A. Yes.
 19 Q. And all of a sudden that becomes a scenario, this
 20 sticker has been put there for your attention. Is this
 21 a form of like imagination or is this based on your
 22 intel, that there's a sticker near your house so
 23 "They're getting near me, they're closing in on me"; is
 24 that correct, or ...?
 25 A. From previous employees who have been targeted, before

1 they got targeted stickers would appear near their
 2 houses so this worried me, yes, that I would be
 3 targeted.
 4 Q. What about using your rational brain to think that
 5 that's just one of those — not even a protestor, it
 6 could be someone that read another Daily Mirror article
 7 in the past, they're against what you do at MBR and it
 8 could have nothing whatsoever to do with you. Did that
 9 occur to you?
 10 A. Firstly, I've never read the Mirror article and,
 11 secondly, due to all what's gone on regarding all the
 12 other members of staff who have been targeted, it would
 13 make anyone paranoid and worried that their house could
 14 be targeted.
 15 Q. Okay. Last point really. Paragraph 104 where you talk
 16 about what you think is mine and Mel Broughton's past.
 17 You've been given information:
 18 "The police have ... informed us of these facts."
 19 Then that leads you to be particularly scared about
 20 me and Mel Broughton. That's true, isn't it?
 21 A. We go back to the beginning where we all went out,
 22 looked on the public domain, gathered all the
 23 information on yourself and Mel Broughton and then,
 24 further down the line, we had a police seminar. They
 25 gave us some of the basic information which we'd already

1 found on the open public network. I'd just like to
 2 inform you of that again and that has worried me, all
 3 the information about both of you, yes.
 4 Q. Okay. And you're particularly scared and —
 5 paragraph 106, I think it's the last paragraph I'm going
 6 to come to:
 7 " ... (John Curtin) has had a significant impact on
 8 me."
 9 Yes?
 10 A. Yes, that is correct. That day had worried me
 11 immensely, working outside the gates, for my safety.
 12 Q. Okay. I put it to you that I'm not taking away the
 13 thought processes that you have but it would be my
 14 defence that I acted as a protestor, as a normal
 15 protestor carrying out a livestream. I did not
 16 intimidate, harass or threaten you, I conducted myself
 17 perfectly properly, and the reason that this caused you
 18 so much anxiety was, I would put it to you, a lot more
 19 to do with you and the fact that you work in this place,
 20 and maybe this incident triggered you, there was maybe
 21 a lot of pressure. I put it to you that my behaviour on
 22 that day can't possibly be blamed — well, I can't be
 23 blamed for your mental health issues based on that
 24 incident. That would be — for me, it would be
 25 preposterous and it would be a lot more to do with your

1 own mental difficulties than the actions I took part in
 2 that day.
 3 A. To me, my personal opinion, you intimidated me, abused
 4 me and showed me on livestream the wrong person I am for
 5 doing my job as maintenance, and that has worried me
 6 what's happened to other members of staff who have been
 7 targeted, and this has worried me immensely and
 8 unsettled me.
 9 MR CURTIN: Okay. I have no more questions.
 10 MR JUSTICE NICKLIN: Re-examination?
 11 MS BOLTON: No, my Lord.
 12 Questions from THE JUDGE
 13 MR JUSTICE NICKLIN: Just a few questions from me,
 14 Employee V, please. Mr Curtin asked you some questions
 15 about — it was paragraph 20 in your witness statement
 16 and your concern about photographs of you appearing on
 17 the internet. You said you were concerned about that
 18 and then you said "before they are taken off". Now,
 19 I think I got — later in your evidence you mentioned
 20 that Facebook would remove photographs; is that what you
 21 were referring to?
 22 A. Yes, that's correct. On some of the social media sites,
 23 other members of staff have screenshots what's gone on
 24 and then complained and it's taken down. But
 25 unfortunately, as it's gone on there for a couple of

1 hours, it's been shared and shared and they've taken
 2 screenshots, which is very worrying.
 3 MR JUSTICE NICKLIN: Do the employees take the
 4 responsibility of complaining to Facebook individually
 5 or is it something that's done collectively or on their
 6 behalf by MBR?
 7 A. From what I've spoken to staff members, most of the
 8 staff members complain themselves.
 9 MR JUSTICE NICKLIN: Thank you.
 10 The incident with Mr Curtin on 8 July, we watched
 11 the video, that's the incident of you repairing the
 12 fence, did you report that incident to the police?
 13 A. I reported it to management. That's all I remember.
 14 MR JUSTICE NICKLIN: Thank you very much. And in your
 15 evidence you drew a distinction between peaceful and
 16 non-peaceful protest. Just generally speaking, could
 17 you explain what protest you identify as being peaceful
 18 and what is it that makes it non-peaceful?
 19 A. Peaceful I would say as someone standing outside, not
 20 running in the road, and just the worst thing is trying
 21 to come out of that entrance. You can't see. In my
 22 statement, I'll be very blunt here, it's like Russian
 23 roulette going out the gate. As I say, peaceful is
 24 someone just standing there with their placards.
 25 I don't mind them shouting to a certain extent. But it

1 becomes non-peaceful when they're running out in the
 2 road, throwing things at you, breaking in, threatening
 3 staff with death, I could go on really. That's the
 4 definition between peaceful and non-peaceful.
 5 MR JUSTICE NICKLIN: One of the placards has the words
 6 "MBR Acres and their staff are filthy scum". If
 7 protestors shout that at employees, do you think that
 8 makes that a non-peaceful protest?
 9 A. I can't really answer that. It is upsetting being
 10 called scum when I'm not scum, I'm just doing a job.
 11 I know it's their personal view but they haven't --
 12 what's the word I'm looking for? Okay, they haven't
 13 touched me in any way, they've touched me mentally.
 14 MR JUSTICE NICKLIN: Finally, you've spoken in your evidence
 15 of how you've been affected by the protestors'
 16 activities. Have MBR Acres given or offered you any
 17 counseling or support in relation to the abuse that you
 18 have felt has been directed at you and what you've
 19 described as the terrible fear about what they might do
 20 to you?
 21 A. Part -- we've had somebody come in and talk to us
 22 regarding the protests and how we feel and partly to
 23 guide us through this process, which has helped to
 24 a certain extent. But, unfortunately, when you go out
 25 the gate, it doesn't protect you when you get home. I'm

1 constantly worried of being attacked or having something
 2 done to my car or house, like some of the other members
 3 of staff have had done to them.
 4 MR JUSTICE NICKLIN: Was that just one occasion or is it
 5 something that you can take advantage of as and when you
 6 need it?
 7 A. At the moment we have been told that if we need to speak
 8 to somebody, we can.
 9 MR JUSTICE NICKLIN: Okay, thank you very much. Anything
 10 arising from those questions?
 11 MS BOLTON: No, my Lord.
 12 MR CURTIN: No.
 13 MR JUSTICE NICKLIN: Right. Thank you very much,
 14 Employee V. You'll understand why I'm not using your
 15 name, because we're in open court now. Thank you for
 16 giving your evidence and making yourself available to
 17 the court today. That completes your role in the
 18 process.
 19 A. Thank you very much for having me.
 20 MR JUSTICE NICKLIN: Thank you.
 21 Right. So Tuesday, we'll reconvene.
 22 MS BOLTON: My Lord.
 23 MR JUSTICE NICKLIN: Right. Enjoy your weekend, everybody.
 24 (4.07 pm)
 25 (The hearing adjourned until

Tuesday, 9 May 2023 at 10.30 am)

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