

OPUS2

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

Day 4

April 28, 2023

Opus 2 - Official Court Reporters

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1 Friday, 28 April 2023
 2 (10.30 am)
 3 (Proceedings delayed)
 4 (10.39 am)
 5 MR JUSTICE NICKLIN: Ms Bolton, everybody, sorry for the
 6 delay. I had to deal with an urgent application for an
 7 injunction -- well, certainly arrange for it to be
 8 heard, so that's the reason for the delay. Sorry about
 9 that.
 10 MS BOLTON: My Lord, before I call the next witness,
 11 your Lordship asked about whether we could obtain the
 12 victim impact statements.
 13 MR JUSTICE NICKLIN: Oh, yes.
 14 MS BOLTON: We have those for both Mr Manning and Mr Hardy.
 15 MR JUSTICE NICKLIN: Good. Thank you very much. Have you
 16 given copies to Mr Curtin?
 17 MS BOLTON: We've got copies for Mr Curtin. (Handed)
 18 MR JUSTICE NICKLIN: Okay, thank you.
 19 Just a couple of thoughts that occurred to me. One
 20 of them was, Superintendent Sissons provided me with
 21 a report or witness statement at an earlier stage in the
 22 proceedings. I was, subject to the submissions you want
 23 to make, minded to make enquiries whether he could
 24 provide an updating statement to me.
 25 MS BOLTON: My Lord, I can find out. I don't know his

1

1 involvement today but I can confirm --
 2 MR JUSTICE NICKLIN: Well, you can certainly, I suspect,
 3 even if he's no longer responsible -- it was given an
 4 operation name so he will certainly know who now has
 5 operational responsibility for it. I think it would be
 6 helpful to have that witness evidence updated for the
 7 purpose of the trial.
 8 MS BOLTON: My Lord, I will ask.
 9 MR JUSTICE NICKLIN: Okay, thank you very much.
 10 Right. I think we're ready then.
 11 MS BOLTON: My Lord, I'll call the third witness,
 12 Mr David Manning, please.
 13 MR JUSTICE NICKLIN: Thank you very much.
 14 MR DAVID MANNING (sworn)
 15 MR JUSTICE NICKLIN: Mr Manning, I know you've given
 16 evidence before. If you want to sit down during your
 17 evidence, that's fine, or if you want to stand,
 18 whichever is more convenient for you; all right?
 19 A. Okay.
 20 Examination-in-chief by MS BOLTON
 21 MS BOLTON: Mr Manning, good morning. Mr Manning, there's
 22 a bundle in front of you which should be at the page of
 23 your witness statement, which should start with
 24 a heading with numbers in the right-hand corner --
 25 my Lord, again I'm referring to the "Persons Unknown"

2

1 bundle -- at page 961. Do you see that?
 2 A. Yes, correct.
 3 Q. If you turn to page 963, you'll see the second witness
 4 statement of David Manning.
 5 A. Sorry, 96 ...?
 6 Q. 963. Just a couple of pages on.
 7 A. Yes.
 8 Q. If you turn to page 1008 --
 9 A. Yes.
 10 Q. -- do you see your signature on that page?
 11 A. I do.
 12 Q. And that is your signature?
 13 A. Yes, it is.
 14 Q. And if I could ask you, then, if you look from 1009
 15 through to 1044, is that the exhibit to your witness
 16 statement?
 17 A. Yes. Yes, it is.
 18 Q. Is the content of your witness statement still true to
 19 the best of your knowledge and belief?
 20 A. Yes, it is. Yes.
 21 MS BOLTON: Mr Manning, if you would remain there, there may
 22 be a few more questions.
 23 A. Okay, thank you.
 24 Cross-examination by MR CURTIN
 25 MR CURTIN: So, Mr Manning, you're now employed, according

3

1 to your statement, directly by MBR?
 2 A. I am.
 3 Q. And before that, you worked at MBR but employed as a --
 4 by a security agency?
 5 A. By a ...?
 6 Q. You were employed by a security agency and deployed to
 7 MBR but now you work for MBR. That's correct, isn't it?
 8 A. Yes, I do.
 9 Q. You said yourself you're in charge of security?
 10 A. At the time I wasn't, but now I am.
 11 Q. And what does that role -- roughly, just run us through
 12 it.
 13 A. I have a number of security guards. I'm in charge of
 14 doing the rotas, general day-to-day running of security.
 15 Q. Who comes and who goes, would that be your job I'm
 16 asking?
 17 A. Not --
 18 Q. Particularly to monitor -- not to invite but to
 19 monitor --
 20 MS BOLTON: Let him finish.
 21 MR CURTIN: Is it your job to monitor who comes in and out
 22 of the gates?
 23 A. Who comes -- yes, it is -- to monitor, yes.
 24 Q. Are you in charge of the security at night-time? Do you
 25 work nights?

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1 A. I have done in the past.
 2 Q. Do you regularly work nights?
 3 A. No, I don't.
 4 Q. Are you in charge of security 24 hours a day in some
 5 shape? Being head of security, is that only when you're
 6 on site or is it when you're off site as well?
 7 A. It is when I'm off site as well.
 8 Q. Okay. So part of your job responsibility -- you don't
 9 work with the dogs? I'm asking -- sorry, I should ask
 10 you. Do any of your job roles actually involve hands-on
 11 with the dogs?
 12 A. No, it's not.
 13 Q. No. I would just like to run through some of the bits
 14 of your statement. I'm going just to go through it in
 15 order of your statement. So point number 9, it points
 16 to the fact --
 17 A. Which part of it -- what page? Sorry.
 18 MR JUSTICE NICKLIN: Page 964 in your copy.
 19 MR CURTIN: Same paragraph number?
 20 MR JUSTICE NICKLIN: It's the same paragraph. It's just
 21 different page numbers, Mr Curtin. Don't worry.
 22 Paragraph 9.
 23 MR CURTIN: Okay, maybe --
 24 MS BOLTON: In the bottom right-hand corner, Mr Manning,
 25 it's page 964.

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1 A. It has a hole through the middle. It's before 895.
 2 MR JUSTICE NICKLIN: If you go to the very -- there should
 3 be a tab 3, I think.
 4 A. I have 893.
 5 MR JUSTICE NICKLIN: No, it's 964.
 6 A. 964?
 7 MR JUSTICE NICKLIN: Yes.
 8 A. Yes, it has a hole through it, but yes.
 9 MR JUSTICE NICKLIN: Paragraph 9?
 10 A. Paragraph 9, yes.
 11 MR JUSTICE NICKLIN: Got it. Good.
 12 MR CURTIN: You speak of, amongst your roles, police liaison
 13 officer.
 14 A. Say again. Sorry.
 15 Q. You say:
 16 "... as well as liaising with police and senior
 17 management ..."
 18 "... I am often in charge of notifying police of
 19 various incidents that happen at and on the Wyton Site,
 20 as well as liaising with police and senior management to
 21 get other staff members ..."
 22 A. Yes.
 23 Q. I may have to point you to a video but there may not be
 24 any need for that because I put it to you that one of my
 25 very unofficial roles at the camp is also -- it's

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1 something we have in common -- a police liaison. Have
 2 you witnessed -- if the police were going to speak to
 3 anyone at the camp, have you witnessed yourself -- you
 4 could call me perhaps the go-to person. Have you
 5 witnessed that? Would that be an accurate ...?
 6 A. I've seen them talk to you.
 7 Q. You've seen me talk to lots of people. I'm asking --
 8 there's a number of videos I could show you and there
 9 would be -- in fact when there was police present,
 10 I speak to the police before the demonstration and
 11 I speak to the police after the demonstration. Would
 12 that be something that you've seen on a number of
 13 occasions or would you refute?
 14 A. Yes.
 15 Q. Yes. Have you ever been told -- have you ever had
 16 conversations with the police and maybe my name has come
 17 up -- not because of anything I've particularly done but
 18 perhaps "I'll have a word with Mr Curtin" -- perhaps the
 19 policeman is saying that to you. Has that happened?
 20 A. Not that I recall.
 21 Q. Not that you recall. But you have seen me on the ground
 22 speaking to police?
 23 A. I have seen you on the grounds speaking to police.
 24 Q. And not necessarily to do with something I've done,
 25 something to do with the general overall demonstration.

7

1 The police -- you've seen the police approach myself,
 2 Mr Curtin, in that role? I can show you some videos.
 3 A. I have seen the police speak to you. What they speak to
 4 you, I'm not sure.
 5 Q. Yes. And you've got no awareness -- well, you know how
 6 long I've been there?
 7 A. I do.
 8 Q. I've been there from the beginning of Camp Beagle, so
 9 for the entire 20 months, and I'm one of the most
 10 regular people?
 11 A. Yes, you are.
 12 Q. If I put it to you that I am often a sort of -- I'm the
 13 go-to person for the police, just like you are, at the
 14 camp -- I know you don't know this but you have seen and
 15 you've got some understanding of the protestors -- would
 16 that be a wild accusation by me --
 17 A. Sorry, what's --
 18 Q. -- that I am --
 19 MR JUSTICE NICKLIN: Mr Curtin is suggesting to you that he
 20 is somebody that the police will regularly use as
 21 a contact point for the protestors generally. Now,
 22 you've given very fairly your answers about your
 23 knowledge of Mr Curtin's liaison with the police, but
 24 would you in any way -- if that's what Mr Curtin were
 25 subsequently to say in evidence, would you dispute that?

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1 A. No, probably not, no.
 2 MR JUSTICE NICKLIN: Right.
 3 MR CURTIN: And what about what you've witnessed? And if
 4 I could take you back to the — right back to the
 5 beginning of Camp Beagle, late June/early July 2021,
 6 would it be fair to say — have you witnessed me
 7 addressing other protestors in a way that perhaps no one
 8 else there was doing, in a sort of — not an organising
 9 role, but in a guiding role? Have you witnessed that,
 10 me on the megaphone giving some sort of guidance to
 11 other protestors?
 12 A. I've seen you talk to somebody and then they do
 13 a movement after you've spoken to them, but I don't know
 14 what you've said to them.
 15 Q. Okay. How many times have you seen that happen?
 16 A. I'm not too sure.
 17 Q. Other witnesses have described me as a leader but
 18 I wouldn't describe myself as that, but you've seen on
 19 at least one occasion me talking to someone and then
 20 them appearing — well, you don't know what I said to
 21 them?
 22 A. No.
 23 Q. Can I show you a video? It's a video that's in
 24 Mr Hardy's bundle [sic], 170. I pick it at — actually
 25 a total — I'm picking this as a random incident, if

9

1 I could invite Mr Manning to watch it.
 2 MR JUSTICE NICKLIN: Okay.
 3 (Video played)
 4 MR CURTIN: My Lord, can we pause? I was just going to
 5 suggest, can I intervene and pause or should we just —
 6 MR JUSTICE NICKLIN: Yes, you certainly can, but just give
 7 the instruction to the operator, please, to pause the
 8 video; all right?
 9 MR CURTIN: Okay.
 10 Okay, first of all, you can see a police officer
 11 present; yes? What date are we on? We're on 17 July.
 12 We can see a police — is that two police officers or
 13 one at the gates? I need my glasses. Yes, two police
 14 officers at the gate. Do you see them?
 15 A. I can see two directly at the gate and one in the
 16 left-hand side, just behind you.
 17 MR CURTIN: My problem is — I'm just asking you this
 18 because I've picked this at random and it's not from
 19 your evidence bundle, but just for — to me, I picked it
 20 out as a typical scene. Let's watch it and see if you
 21 disagree. But first we can establish that the police
 22 officers are present. Okay. Good. Okay, we're
 23 rolling.

(Video played)

Can we pause it there as well? That's me taking —

10

1 that's me, the person with the sort of weirdy head
 2 covering on, with the small megaphone, the yellow jacket
 3 on the left.
 4 A. Orange t-shirt, yes.
 5 Q. And I'm taking the banner down?
 6 A. Yes.
 7 Q. Good. Okay. Carry on, please.
 8 (Video played)
 9 Pause it there. It's not central — I've just
 10 spoken to the police officer there. If we could
 11 slightly go back, I've just spoken — if we could take
 12 it back a couple of seconds. There's a very brief bit
 13 of dialogue between me — it might not even be there.
 14 Forget it. Carry on.
 15 (Video played)
 16 Can we pause it there? No, let's listen to what is
 17 said.
 18 (Video played)
 19 Okay, if we can pause it there, please. I've just
 20 been addressing the crowd as the gate was opening.
 21 Do you accept the person on the megaphone — you could
 22 hear a gravelly voice in the background?
 23 A. I can hear a voice.
 24 Q. We could go into minute detail if you want — and you
 25 weren't there anyway — it would be my case that what

11

1 I've just said on the megaphone is that — along the
 2 lines of — not — but I'm just asking him if this
 3 correlates with your sort of memory right back in the
 4 early days. I'm saying, "The workers are coming out and
 5 we're going to shout at them. If we shout at the people
 6 in the streets of Huntingdon, they wouldn't know what
 7 the hell we're doing"; "These people, they have
 8 a context", is what I said. And we could go into it in
 9 minute detail, but I do say, "You may feel ..." —
 10 because this is early days — "You may feel like kicking
 11 the car. Don't. Let's keep it about the dogs". Is
 12 this something you would recognise?
 13 A. I didn't understand what was being said.
 14 Q. No, but what about — would it come as some surprise to
 15 you that Mr Curtin was there — you have the knowledge
 16 that I — and we'll go into this later, that I've got
 17 a lot of experience prior to this. You now know.
 18 I don't know what your knowledge was then. It doesn't
 19 matter. We'll go into that later — but you have
 20 knowledge of my extensive experience with demonstrating?
 21 A. Yes, I do.
 22 Q. So the fact that I'm standing there, not giving out
 23 instructions but giving some guidance to other
 24 protestors as sort of how ideally what's going to happen
 25 here, that we're going to shout and we're going to

12

1 obstruct the vehicles actually -- we're actually going
 2 to slow the vehicles down. I'm saying, "We're going to
 3 slow the vehicles down, but don't kick the cars". Is
 4 that something -- do you have any recollection of me
 5 ever saying anything like that?
 6 A. No, I can't recall it. I don't know what was said on
 7 the video.
 8 Q. Okay. Would that come as a big surprise to you that
 9 Mr Curtin wasn't saying, "Come on, let's smash the cars
 10 up"? I'm putting it to you that is it a big surprise to
 11 you that Mr Curtin, from what you know, from 20 months'
 12 experience between the pair of us, is saying, "Don't
 13 kick the cars. We're going to have a protest, we're
 14 going to slow the cars down, but don't kick the cars"?
 15 Does that correlate with the impression you have of me
 16 or not?
 17 A. I have heard you say that before.
 18 Q. Good. Okay. Now we'll watch the rest of the video.
 19 You're not a witness, but is this something that used to
 20 happen on a daily basis?
 21 (Video played)
 22 So if we stop it there, it would appear that
 23 that's -- that's a blockade of the drive, isn't it, what
 24 we're looking at?
 25 A. Yes, it is, yes.

13

1 Q. It's something that you're very used to seeing at that
 2 period?
 3 A. Yes, it was, yes.
 4 Q. Okay.
 5 (Video played)
 6 And there's a -- stop there -- there's a police
 7 officer at the very end, by the gatepost. Do you see
 8 that, a small police officer?
 9 A. I can see a yellow jacket. I don't know who it is.
 10 Q. Okay. Let's watch.
 11 (Video played)
 12 Can we pause there? Mr Curtin, that's me, on the
 13 very left of the screen with a megaphone?
 14 A. Yes.
 15 Q. On this occasion I'm not blocking the drive -- well, I'm
 16 on the drive, but I'm standing away from the gates; yes?
 17 A. You're standing -- but you are in --
 18 Q. I'm on the drive, yes.
 19 A. You're in the middle.
 20 Q. Okay. If we can carry on.
 21 (Video played)
 22 If we can pause there. The police officer has
 23 addressed -- would you say they've seem to have
 24 addressed the protestors and they're beginning to step
 25 back. That looks like -- do you recognise that scene?

14

1 A. I think she's gesturing to move to the side.
 2 Q. Yes, or to move -- the side, move out the way -- "You're
 3 blocking the road, so move". She's doing her job.
 4 A. She was getting them to move to the side.
 5 Q. And if we can go -- my voice is too gravelly to pick it
 6 up, but I would ask you to, if you could, accept my --
 7 well, would you accept my word for it? I am talking --
 8 we can go back. Have you ever heard -- okay. Have you
 9 ever heard me complain about the workers leaving the
 10 site? I'm here at 11.42. Have you ever heard me,
 11 Mr Curtin, making a complaint? I put it to you it's the
 12 weekend and the workers are leaving at 11.42. Is that
 13 something you've ever heard me complain about?
 14 A. Complain, what, that they're leaving at 11.42?
 15 Q. Yes.
 16 A. I don't get what you mean about the question.
 17 Q. Have you never heard me complaining in the 20 months
 18 that the workers are leaving at 11.42 and they won't be
 19 back until 7.00 am tomorrow? Is this something you've
 20 heard me on the megaphone shout before, "Shame on you
 21 ... " --
 22 A. Yes.
 23 Q. -- "... for leaving the dogs at this time"?
 24 A. Yes.
 25 Q. Very good. Okay, if we can carry on.

15

1 (Video played)
 2 Can we pause it there? There's a snail-like
 3 progress going on of the protestors moving back; yes?
 4 A. Okay.
 5 Q. Would you say?
 6 A. Yes.
 7 Q. Snail-like. Okay. Carry on.
 8 (Video played)
 9 Okay, we can pause it there. You can see me now
 10 moving through the crowd --
 11 A. Yes.
 12 Q. -- that's me, because there's a bit of -- the snail pace
 13 has turned into a very slow snail by now; yes?
 14 See what happens now.
 15 (Video played)
 16 Pause it there. There seems to be a slight increase
 17 now, doesn't it? I've gone to the front and there's
 18 a slight increase in pace. Would you agree with that?
 19 A. Yes.
 20 Q. Good, okay.
 21 (Video played)
 22 And now the police officer gestures for the car to
 23 roll.
 24 (Video played)
 25 And could you pause it there?

16

1 No one -- people are holding up the car but no one
 2 is touching -- no one is kicking the car. Everybody
 3 seems to be doing the same thing of protesting and it's
 4 not like a free-for-all where different people are doing
 5 different things. People seem -- there's -- no one is
 6 kicking the cars, are they --
 7 A. At that angle --
 8 Q. -- or touching the cars?
 9 A. At that angle, no one is touching the cars.
 10 Q. Okay. If we carry on.
 11 (Video played)
 12 Okay, and that was how many cars? That was two cars
 13 we saw leaving the site?
 14 A. That's correct.
 15 Q. So that typical scene there, would you agree with me if
 16 I was to suggest to you that I was doing as much as
 17 I could to facilitate a protest that involved some
 18 obstruction but not blocking the road?
 19 A. I couldn't quite hear what you were saying but you
 20 seemed to help clear the ... a little bit.
 21 Q. Okay. At that period and in fact throughout the whole
 22 time before the injunction, are you aware of some people
 23 kicking the cars sometimes? Have there been cars kicked
 24 as they're coming out?
 25 A. Yes, there has.

17

1 Q. Yes. How many incidences actually happen -- okay, cars
 2 have been kicked, but physical damage to cars as they're
 3 leaving -- remember, you're on oath -- so physical
 4 damage that you as a security guard -- would that be --
 5 if cars were physically damaged, would it be the sort of
 6 incident that you would deal with?
 7 A. Yes.
 8 MR JUSTICE NICKLIN: Okay. Mr Curtin, because you segued
 9 into different questions, you need to separate out. You
 10 see, the first thing is, Mr Manning, have you seen
 11 incidents where cars have been physically damaged?
 12 A. I have had reports that a car has been damaged.
 13 MR JUSTICE NICKLIN: Okay, but you've not seen it yourself?
 14 A. Not directly, no.
 15 MR JUSTICE NICKLIN: All right. But as your role as
 16 a security officer, those matters are reported to you?
 17 A. Yes.
 18 MR CURTIN: And on the whole noisy, it's extremely noisy --
 19 I wouldn't use the word sometimes "peaceful" for the
 20 demonstrations -- noisy, loud, you can put what reading
 21 you want on it, but damaging the vehicles as they were
 22 coming out was not routine. It did happen, but it
 23 wasn't routine; would you accept that? It did happen
 24 occasionally, but it wasn't routine?
 25 A. Yes, that's correct.

18

1 Q. And security guards in this video, they're the other
 2 side of the gate -- they're the MBR side of the gate?
 3 A. That's correct.
 4 Q. Why is that? Why do you stay that side of the gate? In
 5 this period here, at that period of time, did your
 6 security role stop at the gate?
 7 A. Yes, we would only have at the sort of point of the
 8 gate.
 9 Q. Okay. Why is that?
 10 A. That's what I've been told.
 11 Q. Who by?
 12 A. I can't recall who told me. It would have been
 13 management.
 14 Q. So you -- as head of security, who would be your direct
 15 boss?
 16 A. It would be the site manager.
 17 Q. The site manager being at that time?
 18 A. Jane Read.
 19 Q. Pardon?
 20 A. Jane Read.
 21 Q. Is it true at that time --
 22 MS BOLTON: My Lord, may I ask, is it possible -- and
 23 Jane Read is not a problem -- but is it possible, if
 24 people are going to be asked who, that the witnesses
 25 pause for a moment so I can confirm that it's not

19

1 a cipher because I'm just concerned that that could
 2 become a problem if lots of, "Who is this? Who is
 3 that?", is asked, because we do have ciphers, and
 4 I don't want a witness giving a name that's protected by
 5 the court order.
 6 MR CURTIN: I understand the point as well.
 7 At that period of time you never went beyond the
 8 gate -- not never went -- you tell me. At this period
 9 of time, why are the guards not facilitating with the
 10 police the free passage of the workers out?
 11 A. I'm not sure. I wasn't there.
 12 Q. No, but you've just said you were told, no matter what's
 13 happening on the other side of the gate, your job as
 14 security officer stops at the gate.
 15 A. Yes.
 16 Q. Is that right?
 17 A. Yes.
 18 Q. Is that the same -- is that the situation today? As we
 19 speak today, do you confine your activities to this side
 20 of the gate -- to your side, the MBR side of the gate?
 21 A. When it comes past the outside of the gate, it becomes
 22 public property so it would be down to the police to
 23 deal with anything that's outside the gate.
 24 Q. So is it your case that -- your understanding as
 25 security officer that all the land the other side of the

20

1 gate is public highway?
 2 A. Yes.
 3 Q. Are you sure?
 4 A. The land the other side of the gate, at the time of
 5 this, that was public highway.
 6 Q. Okay. That's your understanding. Have you ever -- as
 7 a security guard, have you ever had conversations with
 8 police where they have complained to you about not
 9 coming on to the drive if there's an incident and
 10 dealing with it before you ring the police? Do you ever
 11 remember the police ever criticising you -- or not
 12 criticising but telling you that you should deal with
 13 incidents on the other side of the gate before ringing
 14 them?
 15 A. So I'm not too sure of the question.
 16 Q. The question is: do you remember any conversation with
 17 the police about -- along the lines of the police
 18 basically saying to you, "Before you ring us, could you
 19 please do your job the other side of the gate and
 20 facilitate the passage of vehicles"?
 21 A. Not that I recall.
 22 Q. Not that you recall. I put it to you there have been
 23 occasions where the police have complained to -- they
 24 must have complained to you -- that's where the
 25 complaint would have gone -- of, "Stop ringing us so

21

1 much. Deal with it yourself if it's on your drive",
 2 because we know now -- I put it to you that that has
 3 happened because the case now, isn't it -- have you got
 4 any understanding that MBR's property goes onto the
 5 drive?
 6 MR JUSTICE NICKLIN: Mr Curtin, you're confusing questions
 7 again.
 8 MR CURTIN: Yes, I'm sorry. If you could help me.
 9 MR JUSTICE NICKLIN: Mr Manning, have there been discussions
 10 between you and the police about, as it were, the
 11 delineation of responsibility or the police expecting
 12 you to do more in your role to deal with the protestors
 13 and not to rely on the police so much?
 14 A. Not that I recall, no.
 15 MR JUSTICE NICKLIN: No, okay. Thank you.
 16 MS BOLTON: My Lord, one other matter. I think Mr Curtin is
 17 starting to stray into -- and I think from the question
 18 he was about to ask -- about the land boundaries. That
 19 was all in Ms Pressick's evidence. She was here
 20 yesterday as a witness and that was her evidence.
 21 I don't think security are there to answer all the
 22 questions on the land boundaries changing because
 23 I think that's where this is going. That was
 24 Ms Pressick's evidence.
 25 MR JUSTICE NICKLIN: Yes.

22

1 MS BOLTON: I'm just flagging, if that's where we're going,
 2 it's not this witness' -- it's nothing to do with his
 3 evidence at all.
 4 MR JUSTICE NICKLIN: Well, it may be. Let's see what
 5 Mr Curtin is going to ask.
 6 MS BOLTON: My Lord.
 7 MR CURTIN: Is your understanding today that MBR's boundary
 8 goes to the gate and no further? It doesn't go into the
 9 driveway. You're security -- as a private security
 10 guard, it goes no further than the gate?
 11 A. As of understanding today that the boundary is a yellow
 12 line that's put on the ground.
 13 Q. Okay. So, for example, in the scene that we just
 14 watched of people blockading the gate -- we now know
 15 they were on private land, your land -- from what you
 16 know now, would you consider it your job as security
 17 officer to intervene and to get involved with that
 18 incident or would you just leave it to the police today,
 19 if the same thing were to occur today, say if there was
 20 no injunction?
 21 A. Sorry, say again. Sorry.
 22 Q. I'm sorry. Hypothetical situation: if there were no
 23 injunction and that demonstration was to happen today
 24 and you were on site and you saw people blockading the
 25 gate, what would you do as security, as the head of

23

1 security?
 2 A. So if somebody was blocking -- standing where?
 3 Q. Where we just -- along that metal line.
 4 A. Along the metal line.
 5 Q. Or along the -- just next to the gate.
 6 MR JUSTICE NICKLIN: The metal line will do for the purposes
 7 of --
 8 MR CURTIN: Between the metal line and the yellow and black.
 9 MR JUSTICE NICKLIN: If somebody is standing on the metal
 10 line -- go on, Mr Curtin, what's the question?
 11 MR CURTIN: What would you do -- what would you do if that
 12 happened tomorrow and you're on duty?
 13 A. If somebody was standing there and there's a vehicle
 14 wanting to come out, I would ask them politely would
 15 they move to the side.
 16 Q. Okay, so you would intervene today -- tomorrow, if it
 17 happened tomorrow. But at that time there was
 18 nothing -- everything that happened the other side of
 19 the gate, isn't it right that it was a police matter,
 20 not yours?
 21 A. Yes.
 22 Q. Okay. As your job as security guard -- the head of
 23 security. Sorry, head of security -- it's your job to
 24 know who comes -- who goes in and who goes out, to
 25 monitor who's on site?

24

1 A. Yes.
 2 Q. Therefore, you've just seen the vehicles leave
 3 at 11.45 -- let's put it this way -- I'll put it
 4 a different way. What's your normal working hours?
 5 A. My normal working hours?
 6 Q. Yes.
 7 A. 6.00 in the morning until 6.00 in the afternoon.
 8 Q. And is there normal working hours for other members of
 9 staff. So you've got a 6 till 6 kind of thing.
 10 I wasn't listening to you -- I'm sorry. What are your
 11 hours of working?
 12 A. My working hours are 6.00 in the morning till 6.00 in
 13 the evening.
 14 Q. Right. What about other -- is that a pattern for
 15 security guards? That 6.00 till 6.00, is that shared by
 16 security?
 17 A. In general.
 18 Q. In general.
 19 MR JUSTICE NICKLIN: Okay, Mr Curtin, why are you asking
 20 these questions? What's the purpose of establishing the
 21 hours at which the security guards are on site?
 22 MR CURTIN: I wanted to establish, once these cars have left
 23 at 10.45 or in the daytime, in the weekday, at
 24 4 o'clock, who is on site -- as a security guard, who is
 25 on site.

25

1 MR JUSTICE NICKLIN: Okay. Why is that relevant?
 2 MR CURTIN: To who is on site generally, what's their job
 3 and who is looking after the dogs.
 4 MR JUSTICE NICKLIN: Okay, we're moving into an area again
 5 now where it's not part of this litigation for me or you
 6 to enquire into and for me to make decisions about
 7 whether the ratio of staff or the presence of staff at
 8 the facility at any particular time is sufficient or
 9 adequate. I understand that you have concerns about
 10 that. That's not an issue. Even if there were concerns
 11 about the number of staff that were on site at any
 12 particular time and therefore able to look after the
 13 dogs, that doesn't give you a justification for
 14 trespassing on land, obstructing vehicles, obstructing
 15 access or harassing the staff. So that's -- we're going
 16 back into the area of why it is that you protest against
 17 MBR Acres and that's not something that you have to
 18 demonstrate; all right?
 19 MR CURTIN: Yes. I'm not going to push the point because
 20 I did want to also ask, as a security guard, head of
 21 security, he would know the movement of any veterinary
 22 surgeons on site and I wanted to ask about his knowledge
 23 of how many --
 24 MR JUSTICE NICKLIN: That's not going to be relevant.
 25 MR CURTIN: -- emergency veterinary calls have been made.

26

1 Okay.
 2 Paragraph 12, please.
 3 "As a result of the escalation of the protests ... "
 4 Yes?
 5 A. Hmm--hmm.
 6 Q. As part of the nature of this injunction, the costs that
 7 MBR Acres say they have incurred are in issue so I just
 8 want to talk about the extra costs that you say, as head
 9 of security, have escalated.
 10 So let's go, say -- if I could say that Camp Beagle
 11 began at the beginning of July 2021 --
 12 A. Can I just add, at this particular time I was not in
 13 charge of security.
 14 Q. Okay. But you were a security guard and you've got
 15 a pretty good idea -- you've been working there
 16 a long -- how long have you been working for MBR Acres?
 17 A. About nine years.
 18 Q. Nine years. Did you join once it was owned by Marshalls
 19 or did you have any prior engagement to that?
 20 A. It was owned by Harlan, I think it was.
 21 Q. It was owned by Harlan.
 22 Let's just discuss MBR Acres because that's what
 23 we're dealing with. So even though you weren't -- I'm
 24 not going to ask you questions in relation to you being
 25 a boss of security at this time. I just want you to

27

1 answer the questions from what you knew. So at this
 2 July period and the beginning -- the first initial six
 3 months, you were regularly working there at MBR Acres as
 4 a security guard?
 5 A. That's correct.
 6 Q. And even though you weren't the boss, you had a better
 7 knowledge than anybody else about what the security
 8 arrangements were?
 9 A. Yes.
 10 Q. So I want to talk about the escalation of the protests.
 11 Let's say -- let's pick out within the first three
 12 months. By then we've had the daily protest, we've had
 13 some big demonstrations. At that point, what was the
 14 escalation in the security? What was added to the
 15 security after, say, the three-month period that wasn't
 16 there before?
 17 A. Extra security guards.
 18 Q. How many would you say?
 19 A. It varied.
 20 Q. Could you give some indication?
 21 A. Yes --
 22 Q. Guard dogs? Night-time -- were there night-time guard
 23 dogs employed at that point?
 24 A. At what date was that?
 25 Q. I'm saying the very first three months.

28

1 A. No.
 2 Q. So when you say there was an increase, give the court
 3 some idea of the increase. After three months -- I know
 4 it's a bit random but I'm sure we can work this out
 5 between us. After three months, what would you say --
 6 I'm asking for you, your knowledge of what the increase
 7 of the security was in terms of guards, for example.
 8 How many more guards were employed after three months,
 9 before the camp expanded(?)?
 10 A. It went up to about ten guards a day and then ten guards
 11 at night--time.
 12 Q. Ten guards at night--time. Are you sure about that? Ten
 13 guards at night--time? Think.
 14 A. Approximately, yes.
 15 Q. Every single night? Every single night, ten security
 16 guards in the early period?
 17 A. I recall at a certain period -- I'm not too sure when --
 18 that we did have around that sort of figure on site.
 19 Q. Okay. So there was an increase. What about after
 20 the -- if I can put it, are you aware of the animal --
 21 you are aware, I take it, of the Animal Rebellion
 22 actions, where they've entered the site and I've used
 23 the language they've "liberated the beagles" -- you're
 24 aware of those actions, the Animal Rebellion actions;
 25 yes? Are you aware of two incursions into the site by

1 Animal Rebellion, where they came and removed dogs from
 2 the site?
 3 A. Yes.
 4 Q. One in June of last year, one in December of last year;
 5 is that correct?
 6 A. Yes, that's correct.
 7 Q. Was there an increase in security after those actions?
 8 A. I can't recall if there was any more put on.
 9 Q. Okay. Well, I put it to you, to refresh your memory --
 10 I put it to you, before the June action of
 11 Animal Rebellion, the employment of night--time security
 12 guards with dogs didn't happen. That happened after the
 13 Animal Rebellion action. Would that be a fair
 14 summing--up?
 15 A. I can't honestly remember the date when we started doing
 16 the dog handlers at night.
 17 Q. You can't?
 18 A. Not the exact date, no. I don't believe there was dog
 19 handlers on site on the first one.
 20 Q. Okay, so that will help us then. So the first -- on the
 21 June Animal Rebellion action, where they came in at
 22 early morning, there were no security dogs?
 23 A. No.
 24 Q. So would I be -- so have you got no memory -- do you
 25 remember the introduction of the security guards with

1 the dogs?
 2 A. I can't remember the exact date.
 3 Q. I'm not asking for the date. Do you remember -- it was
 4 a new move in security, wasn't it? You were head of
 5 security before. One minute you don't have night--time
 6 security with dogs and then the next minute you do, but
 7 you don't remember that? Think.
 8 A. Well, I recall on -- I believe that after -- yes, there
 9 was no dog handlers on site on the two excursions [sic],
 10 yes.
 11 Q. Okay, so the "yes" is --
 12 MR JUSTICE NICKLIN: Let me try to help, Mr Curtin.
 13 Mr Manning, after there were the break--ins, was
 14 there an increase in the overall level of security?
 15 A. Yes, because there was no dog handlers on that night,
 16 yes.
 17 MR CURTIN: Okay. That's my point. I can move on.
 18 Can I take you to paragraph 22, please?
 19 A. Yes.
 20 Q. Just the first sentence really -- well, perhaps the
 21 following:
 22 "During the summer of 2021, the protests outside the
 23 Wyton Site became more intense and frequent, and it was
 24 not possible to enter or exit the Wyton Site safely."
 25 Yes?

1 A. Yes.
 2 Q. So we're talking about before the camp -- there were
 3 demonstrations before the camp, wasn't there, some --
 4 A. Yes.
 5 Q. -- isolated, but once the camp started -- what I take
 6 issue with there is the word -- well, let's discuss it.
 7 "... it was not possible to enter or exit the
 8 Wyton Site safely. In particular, cars trying to enter
 9 and exit the Wyton Site were frequently obstructed and
 10 surrounded by large groups ..."
 11 I suppose my issue where I've pointed out here is
 12 safety. We've gathered that some damage of cars may
 13 happen on isolated occasions, but generally, as the cars
 14 came in -- come and go, they are greeted by protestors
 15 who are protesting and shouting. Would that be correct?
 16 It wasn't routine that people were attacking the cars
 17 physically at that point?
 18 A. It wasn't routine but it had happened before.
 19 Q. Okay. I suppose the reason I did it is to -- and I'm
 20 picking up on the word "safety" -- I just want to
 21 exclude physical attacks on the staff at the gates.
 22 That would be -- are you aware of, say, in the first --
 23 well, any period -- are you aware of physical attacks on
 24 workers as they came and left the Wyton site -- physical
 25 attacks --

1 A. Not --
 2 Q. -- to their person?
 3 A. No.
 4 Q. And some isolated attacks on the cars perhaps but not
 5 routine?
 6 A. That's correct.
 7 Q. Well, in fact, I know there have been a number and if
 8 you witness such an attack, what would you do? If you
 9 witnessed an attack on a car, someone kicked a car, for
 10 example, what would you do?
 11 A. What would I do? I'd make sure they're okay themselves
 12 and then I'd say to them that, if you feel you want to
 13 report it to the police, then report it.
 14 Q. Did you -- so have you got some memory of damage to
 15 cars -- I'm asking for an accurate picture -- but rare.
 16 We're talking daily demonstrations. The amount of
 17 reports you made to the police about actually damaging
 18 vehicles was rare?
 19 A. It may be rare but it still can happen.
 20 Q. Okay.
 21 MR JUSTICE NICKLIN: Who was responsible -- if the report
 22 was made to the police about damage to a car, who was
 23 responsible for making the report to the police?
 24 A. It would be that person, the vehicle owner.
 25 MR JUSTICE NICKLIN: Did you have involvement in relation to

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1 those matters?
 2 A. The only involvement I would have would be to submit the
 3 CCTV if there is any.
 4 MR JUSTICE NICKLIN: So would it be routine for the police
 5 to ask whether you had CCTV footage relating to any
 6 incident where it was now alleged that there had been --
 7 A. Yes.
 8 MR JUSTICE NICKLIN: Yes, all right.
 9 MR CURTIN: Paragraph 33, if I could ask you to read the
 10 first sentence.
 11 MR JUSTICE NICKLIN: Paragraph what? Sorry, Mr Curtin.
 12 MR CURTIN: Paragraph 33. In fact if you could read the
 13 entire paragraph.
 14 (Pause)
 15 A. Okay.
 16 Q. And if you could read the first sentence of the next
 17 paragraph, 34 -- in fact the first two sentences.
 18 (Pause)
 19 A. Okay.
 20 Q. So you've been told by the company -- you've been
 21 informed by the company not to engage with protestors?
 22 A. That's correct.
 23 Q. And what about if I was to put to you, do you have any
 24 memory at all of me, in the early days, attempting to
 25 speak to you? I think there's an actual incident you

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1 refer to later on, but, generally, before we deal with
 2 that, have you got any memory of me trying to talk to
 3 you?
 4 A. Not that I recall.
 5 Q. If I did, what would you have done?
 6 A. Just listened and that's it.
 7 Q. I put it to you that I did -- there were occasions where
 8 I did approach you but it was like speaking to a brick
 9 wall. I don't remember you being particularly rude but
 10 there was nothing coming from your side. Have you got
 11 any memory that that might have happened earlier on?
 12 You don't have to remember it.
 13 A. It's -- a lot of it is -- not that I recall, but I'm not
 14 sure 100%.
 15 Q. It's not an important point. Can we watch video 950,
 16 please, relating to paragraph -- if you could read
 17 paragraph 37 and then we'll watch a video.
 18 MS BOLTON: My Lord, may I suggest -- I'm conscious we need
 19 an Opus break and I think it's a massive video so we're
 20 going to need a time stamp for the video and it might be
 21 a good time to take a break so that can be organised.
 22 MR JUSTICE NICKLIN: Yes, we'll take our break, Mr Curtin.
 23 Have a look at the video in the break and work out which
 24 bit that you really want to concentrate on.
 25 MR CURTIN: Yes, if I can speak to ...

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1 MR JUSTICE NICKLIN: Yes, sure. Okay.
 2 Mr Manning, we're going to have our mid-morning
 3 break now. Please don't talk to anybody else about your
 4 evidence. It's an important rule while you're giving
 5 evidence.
 6 A. Yes.
 7 MR JUSTICE NICKLIN: I've got no reason to think that you
 8 would do anything wrong. That's not what it's about.
 9 A. No, okay.
 10 MR JUSTICE NICKLIN: It's just a warning I have to give to
 11 everybody. All right?
 12 A. Yes.
 13 MR JUSTICE NICKLIN: Thank you very much.
 14 Right, we'll come back at 11.55, please; all right?
 15 (11.39 am)
 16 (A short break)
 17 (11.58 am)
 18 MR JUSTICE NICKLIN: Yes, Mr Curtin.
 19 MR CURTIN: Yes, if the witness may be shown -- the video is
 20 ready to go.
 21 MR JUSTICE NICKLIN: Yes.
 22 MR CURTIN: If you could watch that.
 23 (Video played)
 24 Okay, stop there.
 25 So if we go back to paragraph 37, you talk of:

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1 " ... [Mr] Curtin approached me and my colleague to
 2 film us, and came very close to me, almost touching me,
 3 multiple times. If someone came that close to me
 4 outside of work I would tell them to get out of my
 5 personal space."
 6 Yes?
 7 A. Hmm—hmm.
 8 Q. So that incident there, you haven't said it in this
 9 statement, but did you find that alarming at the time?
 10 Did it cause you any harassment or threat, the fact
 11 I was standing in your vicinity filming? Because you've
 12 spoken before — sorry, this is what I do — you've
 13 spoken before about you don't like people being near
 14 you.
 15 A. (Inaudible)
 16 Q. I put it to you that's more to do with your issues than
 17 my behaviour. What would you say to that?
 18 A. When you're talking, you're shouting and coming across
 19 a lot louder than people do when you talk or when
 20 a normal person talks.
 21 Q. Okay, well, you haven't mentioned that in your evidence
 22 here. There's no mention of shouting in your evidence.
 23 We have to rely on the evidence.
 24 A. Okay.
 25 Q. So from what we've seen there — there's no sound on

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1 it — you didn't like me being that close to you,
 2 did you?
 3 A. No.
 4 Q. No. But I put to you that's more to do with your issues
 5 than my behaviour.
 6 A. You approached us. We didn't approach you.
 7 Q. That's correct. Okay. Let's move on.
 8 Ah, your Honour, I've got two short video clips that
 9 I'd like to show the witness.
 10 MR JUSTICE NICKLIN: That's fine.
 11 MR CURTIN: The first one, 828. Do you remember the video
 12 we watched at random before —
 13 MR JUSTICE NICKLIN: Just pause a moment. It's very
 14 important that, because the transcribers — we're
 15 looking at video recordings — it's very important that
 16 everybody makes a reference so the transcriber has
 17 recorded what video we're watching. So what are we
 18 watching now? Video 828?
 19 MR CURTIN: 828, which I do believe is a witness,
 20 Mr Hardy's, dashcam.
 21 MR JUSTICE NICKLIN: That's fine.
 22 MR CURTIN: If we can play a couple — two seconds of it and
 23 then pause.
 24 (Video played)
 25 I put it to you — have you accepted this is

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1 a dashcam of actually the same incident we watched
 2 before, which I picked at random, the — when we talked
 3 about the protestors at the gate and you weren't
 4 (inaudible) — the very first video we watched today.
 5 Would you accept that this is — you don't have to
 6 accept — but this is Mr Hardy's dashcam video of that
 7 same day? Yes?
 8 A. I'm not sure.
 9 Q. It doesn't matter anyway.
 10 MR JUSTICE NICKLIN: It's not likely to be in dispute,
 11 Mr Curtin, so carry on.
 12 MR CURTIN: Okay. Now if we could go to where ...
 13 (Video played)
 14 Stop there. After the incident, the very snail-like
 15 exit of the cars, this is the dashcam from Mr Hardy as
 16 he drives out. Now, watch what happens next.
 17 (Video played)
 18 If you could pause it there — if we could take it
 19 back just a few seconds.
 20 (Video played)
 21 Then stop there. You can see there's a policeman on
 22 the road — a policewoman I think it is, actually,
 23 sorry.
 24 MR JUSTICE NICKLIN: If you say "police officer", you can't
 25 get it wrong.

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1 MR CURTIN: Police officer. Then carry on, please.
 2 (Video played)
 3 Stop there. So that's someone obstructing the
 4 passage of the car, isn't it?
 5 A. Yes.
 6 Q. And that wouldn't be my case that that's the first time
 7 that happened. That used to happen occasionally,
 8 didn't it? After a car drove out, sometimes perhaps
 9 there would be another protestor further down blocking
 10 the road; yes?
 11 A. Yes.
 12 Q. If we can carry on watching.
 13 (Video played)
 14 Stop there. I put to you that what you've just seen
 15 there is Mr Curtin having a word with the protestor and
 16 the protestor, immediately after Mr Curtin says whatever
 17 he said — we can't hear it — they move out the way.
 18 A. Yes.
 19 Q. Then we'll watch the rest.
 20 (Video played)
 21 And then the car goes off. I just want to draw your
 22 attention to that bit in relation to the bit that
 23 I alluded to earlier, where I said, in those early days,
 24 had you witnessed Mr Curtin giving some sort of guidance
 25 to other protestors — and we're never going to know

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1 what I said to that person, but I go to them and then
 2 they move out. It's possible I said to that person,
 3 "There's a police officer there. Come on. Let the car
 4 go". Would you accept -- would that come as a shock to
 5 you if I was to suggest to you that's what happened
 6 there?
 7 A. I'm not sure what you said.
 8 Q. No. But by the looks of it, Mr Curtin perhaps
 9 facilitated the actual free passage of that vehicle?
 10 That's a possibility. Is that in line with other
 11 actions that you've seen me do?
 12 A. Possibly, but it might not be. I'm not too sure what
 13 you said to her. You could have said a number of
 14 things.
 15 Q. Okay. I was just asking.
 16 MR JUSTICE NICKLIN: Mr Curtin, don't feel that you need to
 17 try and get all of the evidence that you need for your
 18 case out of Mr Manning. You are perfectly entitled to
 19 rely upon video evidence. So when you come to give
 20 evidence, you are entitled to tell me about what -- for
 21 example, that extract there, that you want to rely upon
 22 as indicating what your role was in Camp Beagle and the
 23 extent to which you tried to facilitate protest but also
 24 enable the workers to come and go, you can do that and
 25 then you can tell me about it in your evidence; all

1 right? So remember that, of course, there's a limit to
 2 what Mr Manning knows about and there may be things you
 3 want to refer me to but Mr Manning doesn't know anything
 4 about.
 5 MR CURTIN: Yes, I was just interested.
 6 MR JUSTICE NICKLIN: All right.
 7 MR CURTIN: Okay, if we go on to -- we're fast-forwarding in
 8 time but I want to get the video evidence done. If we
 9 go to the last video, if we can shoot forward in time to
 10 ...
 11 (Video played)
 12 Stop there.
 13 MR JUSTICE NICKLIN: Right. Video -- this is D11, is it?
 14 MR CURTIN: D11. So before we play it -- it's 22 March -- it
 15 would be my case to you that we've seen the -- how can
 16 I describe it?
 17 A. Sorry, how do I know this is 22 March?
 18 Q. You'll see that in a minute when it plays.
 19 A. Okay.
 20 Q. So you've seen the scenes at the beginning of
 21 Camp Beagle, where there's people protesting at the
 22 gates --
 23 A. Is that this --
 24 Q. No. The early video showed the June 2021/July 2021 --
 25 A. Yes.

1 Q. -- where there's protestors, there's police, there's
 2 security guards. I would ask you to -- I want you to
 3 watch this and then I'll ask you some questions.
 4 (Video played)
 5 Okay, finish it there. That scene there, would you
 6 describe that as typical of the situation, the current
 7 period, with no police, not even any -- there's no
 8 police?
 9 A. No police, no.
 10 Q. What about no security guards?
 11 A. There is security.
 12 Q. Show me the security.
 13 A. If you go back a little bit, you'll be able to see one
 14 near the office.
 15 (Video played)
 16 Stop.
 17 Q. Ah yes, hiding. I see.
 18 MR JUSTICE NICKLIN: Mr Curtin, don't comment on the
 19 answers; all right? That's one of the rules.
 20 MR CURTIN: Okay.
 21 MR JUSTICE NICKLIN: So for you to say "hiding" is a comment
 22 on the witness' answer. It's not appropriate; all
 23 right?
 24 MR CURTIN: Okay. Apart from that one solitary security
 25 guard who is keeping quite a low profile, that's the

1 general state of play as we speak today, isn't it?
 2 That's a typical scene when workers leave?
 3 A. What, the fact that they're there -- they are still
 4 there?
 5 Q. There are protestors, there are cars coming out and --
 6 there's a protest, there's a lack of violence, there's
 7 no need for the police to be there. That's typical of
 8 daily events now on the Wyton site as workers leave or
 9 arrive?
 10 A. Not always, but, yes, generally.
 11 Q. Good. Okay, let's go back to the evidence. Point
 12 number 60 -- we don't really need to play the video --
 13 MR JUSTICE NICKLIN: Wait a minute, Mr Curtin.
 14 Paragraph 60, right.
 15 MR CURTIN: So I'm talking -- I think I deal with this in my
 16 evidence. Do you accept it does show an incident of
 17 a vehicle -- you talk of a van being blockaded for some
 18 minutes actually, for perhaps three to four minutes if
 19 you read your statement, if you read section 61.
 20 So there's an obstruction --
 21 MR JUSTICE NICKLIN: Hang on. Let him read the statement.
 22 (Pause)
 23 A. Okay.
 24 MR CURTIN: I will ask you one question actually. The very
 25 last sentence, someone is asking you what's in the van,

1 the sentence before, and you say:
 2 "I found this quite scary, as I did not want to give
 3 her the information she wanted, but I did not what she
 4 was capable of if I continued to refuse to tell her."
 5 Yes?
 6 A. I've put that I did not know what she ---
 7 Q. Yes, I really refer to the fact of why you found this
 8 scary, someone asking you what was in the van.
 9 I would suggest to you that this is your fear of
 10 protest rather than an action of the protestor
 11 themselves. You have a fear of someone asking you
 12 a question?
 13 A. Yes.
 14 MS BOLTON: My Lord, I don't want to interject but there's
 15 a whole section to this date and the witness is being
 16 taken to only part of what is broken down in the
 17 statement. If I may suggest --- I don't want to say
 18 anything more than that but I think it's an incident
 19 date with lots of factors. So the witness should be
 20 taken to the whole of it, not part of it, because it
 21 takes it out of context. That's my only --- I'd just
 22 like to be clear that we're doing that.
 23 MR CURTIN: I'm going paragraph by paragraph. I'm starting
 24 off ---
 25 MS BOLTON: I think I know what the problem is, my Lord.

1 I've got a funny feeling ... I'm just checking,
 2 my Lord, that what hasn't happened is part has been
 3 chopped out for different bundles. I'm just checking.
 4 MR JUSTICE NICKLIN: Are you working from your own bundle?
 5 MS BOLTON: My Lord, it's a separate incident. It's my
 6 fault. Mr Curtin, I apologise for interrupting.
 7 MR CURTIN: No problem.
 8 Again you said:
 9 "I found this quite scary, as I did not want to give
 10 her the information she wanted, but I did not know what
 11 she was capable of if I continued to refuse to tell
 12 her."
 13 I'm not refuting the fact that you found something
 14 scary, I'm bringing into question your reasonable
 15 firmness in this situation, as head of security ---
 16 someone is asking you a question, "What's in the van?",
 17 and by questioning the validity of --- I'm not
 18 challenging the fact that you found it scary but I'm
 19 asking you to --- I'm challenging the basis of your
 20 reasonable firmness in this situation.
 21 A. As I explained at the time, at that particular time
 22 there, I was not the head of security. Sorry, what was
 23 the actual question?
 24 Q. As a security guard, that somebody asking you a question
 25 about what's in the van and then you not being able to

1 tell her, you found it scary and then you're speculating
 2 what she might do. This is your fear package as opposed
 3 to the response that --- a reasonable response to
 4 a demonstrator. They're asking you what's in the van
 5 and you find this scary. I'm challenging --- I'm not
 6 saying you didn't find it scary but is that appropriate
 7 for a security guard --- I'm sorry, I did say head of
 8 security guard. I'm challenging it. If you're
 9 a security guard, perhaps you should take this sort of
 10 thing a bit more in your stride.
 11 A. It doesn't matter what role it is, people can find
 12 things scary.
 13 Q. Okay, let's move on.
 14 If we go to 65, again, if I can --- sorry. I refer
 15 to the last sentence:
 16 "I also found the experience nerve wracking, as it
 17 felt like the protestors wanted to control us by
 18 stopping deliveries."
 19 A. Okay.
 20 Q. The previous sentence, you said that the driver said he
 21 found it nerve-wracking. I'm just challenging your
 22 position actually as a security guard, the fact that
 23 a van has been stopped you find nerve-wracking. I don't
 24 challenge the fact that you did find it nerve-wracking,
 25 I'm challenging the appropriateness of a security guard

1 having that feeling, and it's more to do with your
 2 package of fear than it is of the protesting. The
 3 protestors have stopped the van, but why you find that
 4 nerve-wracking --- explain to me why you find that
 5 nerve-wracking.
 6 A. It's just my feelings.
 7 Q. Okay. Let's move on. Paragraph 70, the entire page,
 8 paragraphs 70, 71, 72, 73, 74, I'm not going to ask you
 9 to read them because I don't know why they're in my
 10 evidence bundle, but they're relating to an attack on ---
 11 a graffiti attack on your house; yes? Take a cursory
 12 glance if you could.
 13 A. Yes, that's basically what I say(?), yes.
 14 Q. It's my case to you that I am absolutely unconnected to
 15 that attack on your house.
 16 A. Is that what you're telling me or is that what you're
 17 asking?
 18 Q. I am asking you, do you ---
 19 MR JUSTICE NICKLIN: Are you suggesting that Mr Curtin had
 20 anything to do with this incident?
 21 A. I'm not suggesting, no.
 22 MR JUSTICE NICKLIN: Right.
 23 MR CURTIN: Good. The same for a funeral pack.
 24 Paragraphs 79, 80, 81, it's to do with ---
 25 A. Sorry, what number? Sorry.

1 Q. 79, 80 and 81. Can you take a cursory glance? It's to
 2 do with some funeral packages being sent to your house,
 3 perhaps on a number of occasions.
 4 A. Okay.
 5 Q. Yes?
 6 A. Yes.
 7 Q. Is it your case that that's connected to -- that I have
 8 any connection with that?
 9 A. I received -- yes, partly my case, but I'm not too sure
 10 what happened regarding the police, whether they dropped
 11 it or they --
 12 Q. To be honest with you, Mr Manning, it's in my evidence
 13 bundle, it's under your statement, but why it's in my
 14 bundle is a mystery to me.
 15 MR JUSTICE NICKLIN: Do you have any reason to believe that
 16 Mr Curtin had anything to do with that?
 17 A. No.
 18 MR CURTIN: Okay. Good.
 19 Paragraph 93, we're nearly there.
 20 A. 93.
 21 Q. A couple more points.
 22 "Since the November 2021 injunction was granted, the
 23 protestors have kept off the access road and back from
 24 the Gate more than they did before the injunction;
 25 however, the injunction has not helped us that much as

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1 the exclusion zone is only halfway across the road, so
 2 the protestors will ... wait on the midpoint of the
 3 carriageway and intercept the cars that are leaving the
 4 Wyton Site there."
 5 Yes?
 6 A. Okay.
 7 Q. Is this -- how often does this happen, that protestors
 8 block the road?
 9 A. Not as much now, but, I mean, it's -- they come across
 10 the midway point, so the vehicle turning right has to go
 11 on the wrong side of the road to go round them, if you
 12 get what I'm saying.
 13 Q. Yes, okay. You've said "intercept the cars", but are
 14 there cars being stopped regularly, as we speak today?
 15 Do you remember the last time a car was actually stopped
 16 leaving the site?
 17 A. Sorry, what was the question?
 18 Q. Do you remember the last time a car was stopped leaving
 19 the site?
 20 A. No.
 21 Q. No, nor do I. Okay. This next bit, if you could --
 22 after it says "... and intercept the cars that are
 23 leaving the Wyton Site there" -- do you have that?
 24 A. No.
 25 Q. It's five sentences down.

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1 A. Five sentences.
 2 Q. I want to draw your attention to the next sentence:
 3 "The camp also still sends protestors ..." --
 4 A. One second, one second. The camp also "...", yes.
 5 Q. If you could read that. I'll read it out as you read
 6 it:
 7 "The camp also still sends protestors in to carry
 8 out acts in the exclusion zone, especially where people
 9 are new to the camp and we will not know their names or
 10 recognise them. The long-standing protestors are aware
 11 of what they are and are not allowed to do, but they
 12 claim it is not their job to police others."
 13 So you've said there the camp sends protestors in to
 14 block the road.
 15 A. Hmm--hmm.
 16 Q. What do you base that on? Is this just a belief or have
 17 you got some evidence to that?
 18 A. No, I've got no evidence. That's what I believe. It
 19 could be -- I could be wrong.
 20 Q. Right.
 21 MR JUSTICE NICKLIN: Just to clarify, you're not suggesting
 22 that Mr Curtin has been one of the people who is
 23 responsible if there is people -- if people are being
 24 sent in to carry out acts in the exclusion zone, you're
 25 not suggesting, are you, that Mr Curtin did it?

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1 A. No.
 2 MR CURTIN: If we can go to -- 98, I'll read it out whilst
 3 you're reading:
 4 "Some protestors particularly intimidate me. D11
 5 (John Curtin) comes very close to my face and as
 6 mentioned above, he has come so close to me that I felt
 7 like he was in my personal space."
 8 Yes?
 9 A. Yes.
 10 Q. So let's just stop there. So so far you've got some
 11 fear because I get in your face; yes?
 12 A. Yes.
 13 Q. "Also, on 7 September 2021 ... (John Curtin) approached
 14 me at the Gate and said he had some personal details
 15 I would not want anyone else to see, which ...
 16 (John Curtin) had been given by a member of staff or
 17 security who passed it to D11 ... through the car
 18 window. He would not tell me what the details were or
 19 what he would do with them, but said that he could
 20 contact me at any time and that I would find out what he
 21 had at some point. I reported this incident to the
 22 police, and I felt [very] shaken up by it. Later that
 23 day, he approached me again, when I was by the perimeter
 24 fence. He said he would pass a piece of paper that was
 25 in his pocket with personal details of mine. I asked

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1 him to show [me] the piece of paper. He looked through
 2 his pockets and said he thought it was in a folder.
 3 I walked away."
 4 Yes?
 5 A. Yes.
 6 Q. So this has caused you some -- it's in a paragraph. You
 7 don't actually say that this bit intimidates you,
 8 do you? I accept this incident happened and that I do
 9 recall the incident. If I could remind you, would you
 10 accept this -- if I could jog your memory, I told you
 11 that security guard -- other security guards had given
 12 me your phone number.
 13 A. You did not specify what they gave you.
 14 Q. I might have at the time. I said I've been given some
 15 information about you. There were other people around,
 16 perhaps, and I did want to keep it confidential between
 17 me and you --
 18 A. Okay.
 19 Q. -- and I was unable to find that bit of paper when
 20 I actually looked for it. I put to you that that was an
 21 attempt by me -- it was in September. It was at a time
 22 where -- I do remember -- do you remember talking to me?
 23 I remember one -- okay.
 24 First of all, I remember you actually wanting to
 25 speak to me one day. Do you ever recall sort of kind of

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1 wanting to speak to me about anything ever, right back
 2 in the early days -- not in the past year or so -- right
 3 back in the early days?
 4 A. Not that I recall.
 5 Q. Okay. It's possible, though, that you actually -- there
 6 was some conversation used to happen between me and you.
 7 It doesn't happen now, but in the early days there was
 8 some conversation. Would you accept that's possible?
 9 A. Not that I recall, no.
 10 Q. Okay. I put it to you that this incident was in fact
 11 a genuine approach by me to tell you that you had
 12 a security problem. Other security guards were giving
 13 out your number, which is a security issue for you, and
 14 I was informing you. Would you suggest that this is
 15 a genuine act by me of wanting to give you some
 16 information rather than some sort of attempt to
 17 intimidate you?
 18 A. Once again, you said to me that you had some information
 19 and that I would know on the later time. You didn't
 20 specify what information that you had of mine.
 21 Q. Okay. Right. Now, 99:
 22 "I am worried about how far ... (John Curtin) will
 23 go in the course of his protest, given those
 24 interactions ..."
 25 Let's stop there. So I presume -- do you mean by

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1 "those interactions" -- do you mean by the previous
 2 paragraph above, do you think, that I get in your space
 3 and there was an example where I spoke to you about ...
 4 "I am worried about how far ... (John Curtin) ..."
 5 There's more, but just given those interactions.
 6 A. I'm just generally -- sort of -- I'll always keep my
 7 guard up, you know, just to make sure I'm okay.
 8 Q. Okay. But in relation to me and my actions, so far,
 9 what do you mean by "those interactions" in your
 10 statement? Do you mean the paragraph above where I get
 11 in your space, according to you, and I perhaps try to
 12 give you a bit of paper, those two incidents? Those two
 13 things have given you some concern? We go on. There's
 14 other reasons.
 15 A. Sorry, so what the question is ...?
 16 Q. What do you mean by "those interactions"?
 17 A. That you cause me ...
 18 Q. "I am worried about how far ... (John Curtin) will go in
 19 the course of his protest, given those interactions ..."
 20 I just want to know what you mean by "those
 21 interactions".
 22 A. Yes, just general ...
 23 Q. By being me, okay.
 24 "... and because I have heard rumours about his
 25 history."

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1 Now, you're on oath. I want to talk about the
 2 rumours.
 3 In this paragraph 99 you talk of doing some research
 4 on me -- yes? -- specifically on me?
 5 A. Very, very limited.
 6 Q. Very limited. So you trawl the internet -- no? You do
 7 some limited research on me on the internet. Now,
 8 remember you're on oath, "... I have heard rumours about
 9 his history". Are you aware of people that you know as
 10 protestors that dislike me?
 11 A. Everyone -- some people dislike you, some people say --
 12 yeah.
 13 Q. Have you ever read a website called "Connie Jurtin"? My
 14 name is "John Curtin". Have you ever read a website
 15 called "Connie Jurtin"? Have you ever heard of it?
 16 MR JUSTICE NICKLIN: Sorry, give your answer.
 17 A. Yes, I have, yes.
 18 MR CURTIN: I put it to you that that site, Connie Jurtin,
 19 is a fake account set up by trolls and it's a sustained
 20 hate campaign against me. It involves --
 21 MR JUSTICE NICKLIN: Okay, one question at a time.
 22 MS BOLTON: My Lord --
 23 MR CURTIN: He has said he's seen it.
 24 MS BOLTON: I was just going to say it's Mr Curtin advancing
 25 a positive case that he's not been involved in some of

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1 the things that are referred to in the witness'
 2 statement, because we don't have that in his evidence
 3 and he will have to be cross-examined over that as well
 4 because that's a positive case over what he has and
 5 hasn't done in the past.
 6 MR CURTIN: No, it's what other people say about me and
 7 (inaudible — overspeaking) rumours.
 8 MR JUSTICE NICKLIN: What's he said —
 9 MS BOLTON: If that's where this is going, because Mr —
 10 MR JUSTICE NICKLIN: So far he's just asking what Mr Manning
 11 knows about it.
 12 MS BOLTON: Well, Mr Manning explains that in his witness
 13 statement. If there's a positive case being advanced
 14 that that's not true, I just flag now we need to know
 15 that because it's no part of Mr Curtin's evidence at the
 16 moment and that will be relevant if he's going to say to
 17 the witness and challenge the witness on what they've
 18 learned from that because — that's all I'm flagging
 19 because the witness does explain what he knows from that
 20 in his witness statement.
 21 MR JUSTICE NICKLIN: Okay. Right. Let's see where we go.
 22 Carry on, Mr Curtin.
 23 MR CURTIN: So you have not only heard — have you looked at
 24 it yourself, Connie Jurtin?
 25 A. Yes.

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1 Q. The Connie Jurtin site, you have. Would it be fair to
 2 say it relates to me, that site? Most of the
 3 information on that site — a lot of it, a lot of the
 4 information —
 5 MR JUSTICE NICKLIN: Well, hang on a minute. Before you
 6 were interrupted, you didn't get an answer to the
 7 question. The Connie Jurtin site, I think Mr Curtin you
 8 said it was —
 9 MR CURTIN: Trolling hate —
 10 MR JUSTICE NICKLIN: — a site trolling Mr Curtin. Was that
 11 your impression of the site?
 12 A. Yes.
 13 MR JUSTICE NICKLIN: Right.
 14 MR CURTIN: On that site, have you read of allegations —
 15 and I'll do a list — of me being a thief, of stealing
 16 money from the campaign, of bullying other protestors —
 17 it gets worse — of being a sex predator of being
 18 a paedophile, for example? Have you ever read any of
 19 those things about me that other people say?
 20 A. I only saw about you taking money, but not — a lot of
 21 it is just — like I said, it was a bit of a —
 22 somebody's opinion. To be honest, I'm not normally
 23 interested. I didn't take a huge amount of interest in
 24 it.
 25 MR JUSTICE NICKLIN: Were you sceptical that it was true?

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1 Was —
 2 A. No, it's — I don't think it's ...
 3 MR JUSTICE NICKLIN: Yes, okay.
 4 MR CURTIN: Have you discussed the Connie Jurtin — the
 5 contents of it, does it get discussed in the workplace,
 6 in the canteen?
 7 A. Not that I'm aware of because I don't go in the canteen.
 8 Q. No. Are you sure? Have you ever had a conversation
 9 about me, say, stealing money? You're aware — you are
 10 aware that there have been allegations that I have
 11 stolen —
 12 MR JUSTICE NICKLIN: Hold on, Mr Curtin.
 13 Are you aware in your job of other people discussing
 14 allegations about Mr Curtin?
 15 A. I've heard one or two sort of conversations, but ...
 16 MR JUSTICE NICKLIN: Right.
 17 MR CURTIN: And being a human being, have you ever had
 18 a discussion about me — I don't care which worker —
 19 with other workers about the contents — for example,
 20 you've talked about, "Mr Curtin is a thief". Have you
 21 ever had a conversation, just a conversation, about
 22 "Last night I read about Mr Curtin being a thief" or
 23 someone else? Has that ever happened behind the gates
 24 of MBR?
 25 A. Not that I recall.

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1 Q. Really? I find that strange, that you don't find out —
 2 you're — come on — in the canteen, with chatting —
 3 A. I don't go in the canteen.
 4 Q. You've never had a conversation about me, about any of
 5 these allegations; no? What about this one? What about
 6 that I've been involved in the exhumation of a grave in
 7 the course of ... have you ever had conversations about
 8 that?
 9 A. I've — once again, it's rumours. It's like I explain
 10 on here. It's a rumour which in — rumours are rumours.
 11 There's no facts in it.
 12 Q. Good. Thank you.
 13 Can I take you to the last sentence of paragraph 99?
 14 You say you did some research yourself on me being
 15 arrested for grave exhumation; yes?
 16 A. Yes.
 17 Q. And that you read that from a Guardian article; yes?
 18 A. Yes.
 19 Q. Not a conviction.
 20 A. No.
 21 Q. An arrest. Right. I'll take you to the last sentence:
 22 "I do not know anything more about these allegations
 23 than that, but it makes me think that if he is prepared
 24 to stoop that low, or be involved with people that stoop
 25 that low, he could be capable of doing anything to me."

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1 Yes?
 2 A. Yes.
 3 Q. Now, so you've heard these rumours that you don't know
 4 are true and you're a human being. So I put to you
 5 that -- "Some protestors particularly intimidate me" and
 6 then you go on to talk about me. I suggest to you that
 7 some of your fear of me, some of that is -- what's
 8 responsible for that is gossip about me that perhaps is
 9 not true and things you might have read on Connie Jurtin
 10 and maybe other troll sites. This will have affected
 11 your opinion of me, if you think they're true.
 12 A. There's no conviction in the -- about the grave, that's
 13 gossip to me. That's ... When I say I find you
 14 intimidating, it's when you come close to me, you're
 15 shouting, some of the words you come out with.
 16 Q. Okay.
 17 MR JUSTICE NICKLIN: Can I just clarify, then, because in
 18 the final sentence you say, "I do not know anything more
 19 about these allegations", which talk about the earlier
 20 part of that paragraph, about what you'd read
 21 in The Guardian.
 22 A. Yes.
 23 MR JUSTICE NICKLIN: "... but it makes me think that if he
 24 is prepared to stoop that low, or be involved with
 25 people that stoop that low, he could be capable of doing

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1 anything to me."
 2 Now, the impression I've got from your evidence is
 3 that you didn't take these allegations particularly
 4 seriously.
 5 A. No, not really, no. It's rumours that's ...
 6 MR JUSTICE NICKLIN: Well, in light of that, are you happy
 7 that the final sentence -- do you want -- just read that
 8 final sentence of the paragraph again to yourself
 9 because I'm not clear how that -- if you thought they
 10 were just rumours and just people saying things, how it
 11 can have the impact that you're saying in that final
 12 sentence.
 13 A. It's just something you have in the back of your mind.
 14 MR JUSTICE NICKLIN: Right.
 15 A. It's ...
 16 MR JUSTICE NICKLIN: Okay.
 17 MR CURTIN: It's not in my evidence bundle, but you talk
 18 of -- perhaps paragraph 104 -- 103, sorry, if I can read
 19 it out:
 20 "When travelling into or out of the Wyton Site,
 21 I would often take detours from my usual route to make
 22 sure that I was not being followed or watched by
 23 a protestor; prior to 5 May 2022 ..."
 24 Yes?
 25 A. Say again. Sorry.

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1 Q. When travelling in and out the Wyton Site, you would
 2 take detours from your usual route "to make sure that
 3 I was not being followed ... prior to ... [5 May]".
 4 A. Yes.
 5 Q. Now, 5 May, wasn't that an attack on your house,
 6 a graffiti attack?
 7 A. Yes.
 8 Q. And, again, like with the funeral, there's no allegation
 9 that I was involved in that in any way?
 10 A. Hmm--hmm.
 11 Q. No. Would you accept that I wasn't involved in any way
 12 on the attack of your house?
 13 A. I have no evidence to prove that.
 14 MS BOLTON: My Lord, it's not in Mr Curtin's bundle because
 15 it's not an allegation against Mr Curtin.
 16 MR CURTIN: Okay. Good.
 17 Paragraph 105 --
 18 MS BOLTON: That's also not in your bundle, Mr Curtin.
 19 MR CURTIN: It is in my bundle. It's in front of me.
 20 MS BOLTON: No, it's not. That's the persons unknown
 21 bundle.
 22 MR CURTIN: Oh, it's not? Defendant 11, that's me.
 23 MS BOLTON: 105?
 24 MR CURTIN: 105. It's not very contentious --
 25 MR JUSTICE NICKLIN: What page is it in your bundle,

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1 Mr Curtin?
 2 MR CURTIN: D11, 416.
 3 MR JUSTICE NICKLIN: Well, Ms --
 4 MS BOLTON: My Lord, I'm not going to object.
 5 MR JUSTICE NICKLIN: Well, it doesn't appear to be correct,
 6 what you said before either, because paragraphs 103 to
 7 105 are in Mr Curtin's statement.
 8 MS BOLTON: Sorry, we're checking one bundle while I've got
 9 the persons unknown bundle, but if we're wrong, my Lord,
 10 I apologise.
 11 MR JUSTICE NICKLIN: Right.
 12 MR CURTIN: Paragraph 105, if I could read it out:
 13 "I'm no longer able to simply have a coffee in Costa
 14 or walk around the town freely because I am fearful that
 15 people will want to shout and scream at me as a result
 16 of my employment with MBR."
 17 Yes?
 18 A. Hmm--hmm.
 19 Q. Then you say, "I am always on edge ...", but it's this
 20 bit -- so you fear that people will target you in the
 21 street perhaps, "He works at MBR"?
 22 A. Yes.
 23 Q. Yes, okay. Just that. Okay, thank you.
 24 Paragraph 107, if you could have a read while I read
 25 it out to you:

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1 "I have been subjected to physical abuse, which
2 I link to the protests. Over the bank holiday weekend
3 of Saturday 28 August 2021 to Monday 30 August 2021,
4 I saw a neighbour who was intoxicated and I started
5 helping him home. The neighbour started talking about
6 my work, even though I have never told him what I do or
7 who I work for. The neighbour then became angry about
8 my job, and started to hit me. I called the police who
9 arrested my neighbour."

10 So there's an incident of a drunken neighbour
11 attacking you, which he did, I presume, and you rang the
12 police. I put to you that the only link -- well, what
13 is the link of that to the protests, please tell me?

14 A. Because you started to call me a puppy killer, chanting
15 "Camp Beagle".

16 Q. Do you object to being called a puppy killer?

17 A. It's not very nice.

18 Q. It's not very nice. I said do you object to it? Do you
19 refute it? Are you a puppy killer?

20 A. No.

21 Q. Do you accept that the company that you work for, that
22 you're employed by, kill puppies?

23 A. I don't know.

24 Q. You don't know?

25 A. I don't have anything to do with the dogs.

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1 MR JUSTICE NICKLIN: Now, Mr Maher, if you're going to
2 remain in court, you are not going to comment on
3 evidence given by the witnesses; all right?

4 MR CURTIN: I have requested that --

5 MR JUSTICE NICKLIN: Sorry?

6 MR CURTIN: I have requested to people from the public
7 gallery that they remain quiet.

8 MR JUSTICE NICKLIN: Yes. Well, let's be clear. I won't
9 tolerate interruptions or anything that could be
10 construed as in any way seeking to influence the
11 witness' evidence and anybody who does that will not be
12 participating in the rest of the trial.

13 Right.

14 MR CURTIN: You just said you know -- did you say you
15 know -- can we look at the transcript? Did you say you
16 know nothing?

17 A. No, I don't.

18 Q. You stick with that?

19 MR JUSTICE NICKLIN: "I don't have anything to do with the
20 dogs" is what his answer was.

21 MR CURTIN: You're a security guard.

22 A. Yes.

23 Q. You don't go inside the shed routinely, you don't clean
24 the shed --

25 MR JUSTICE NICKLIN: Okay, Mr Curtin, we're moving into an

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1 area where -- I've allowed you to ask those series of
2 questions because they're relevant to the impact the
3 protest has on Mr Manning --

4 MR CURTIN: Okay.

5 MR JUSTICE NICKLIN: -- but you're not going into
6 Mr Manning's personal awareness of what takes place or,
7 still less, what he thinks about it; all right?

8 MR CURTIN: Yes. I wasn't going down that road.

9 MR JUSTICE NICKLIN: Right.

10 MR CURTIN: I wanted to -- can I proceed because I wasn't
11 going down that road?

12 MR JUSTICE NICKLIN: Go on then.

13 MR CURTIN: I put it to you, Mr Manning, that it's a fair
14 thing for a protestor to call you a puppy killer because
15 MBR does indeed kill puppies and you're an employee of
16 that company, so you're all puppy -- equally I would
17 say, as a protestor, I have a right to do that and
18 a legitimate right and I think it's correct. I feel
19 safe calling you a puppy killer, but you don't like
20 that, do you?

21 A. No.

22 MR JUSTICE NICKLIN: Mr Curtin, let me ...

23 Mr Manning, what Mr Curtin is putting to you is that
24 the reason that some of the protestors shout out at
25 individuals who they identify as being connected with

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1 MBR is because they believe that, because dogs die as
2 part -- sometimes, as part of the operation, that they
3 regard those people who work for MBR as being in some
4 way responsible for that. That's what's being suggested
5 to you. In light of that, he's asking you to consider
6 whether you appreciate why it is that they make the
7 allegation of "puppy killer" towards you.

8 A. I can understand to a point but when they say, "You are
9 a puppy killer", that is directed at me and that -- I am
10 not a puppy killer. If you're directing it at somebody,
11 you're saying, "That person kills puppies". I have
12 never killed a puppy in my life.

13 MR CURTIN: I understand your answer.

14 Back to 107, linking it to the protests, so this
15 man, this drunken neighbour, is calling you a puppy
16 killer and you're blaming the protestors for that. How?
17 Why? How? Explain this.

18 A. Because he's chanting "Camp Beagle". I'm not saying --

19 MR JUSTICE NICKLIN: Sorry, let's just be clear. Have you
20 any reason to believe that your neighbour is connected
21 to Camp Beagle?

22 A. No. He has said that he used to watch their videos --

23 MR JUSTICE NICKLIN: Right.

24 A. -- but he's got no direct contact.

25 MR JUSTICE NICKLIN: Okay.

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1 MR CURTIN: Okay, I can move on from that. I'm near the end
 2 now.
 3 110, this is in my bundle so I have to challenge you
 4 with it.
 5 "Since the incident on 5 May [which was the attack
 6 on your house] ..."
 7 A. Hmm—hmm.
 8 Q. "... when my home was targeted, every time I leave my
 9 house I now look ..."
 10 You do lots of security checks; yes?
 11 A. Yes.
 12 Q. Again, I would ask you to -- you haven't linked me with
 13 the house, so I'm not responsible for that.
 14 A. As far as I'm aware, yes.
 15 Q. Pardon?
 16 A. As far as I'm aware, you're not.
 17 Q. Okay. Right. I think we're on the last ...
 18 There's talk here -- I'll read it out:
 19 "I am worried about the verbal abuse ..." --
 20 A. Sorry, where are you reading from?
 21 MR JUSTICE NICKLIN: 112.
 22 MR CURTIN: 112. Do you have it?
 23 A. Yes.
 24 Q. "I am worried about the verbal abuse and physical danger
 25 from the protestors. I am worried about what the

1 protestors might do and what lengths they might go to.
 2 For example, there is a protestor (who I have seen ...
 3 (John Curtin) refer to as 'Graham Neil' on Facebook, but
 4 I do not know if that is his real name) who has been
 5 outside the Wyton Site saying he's going to 'come for
 6 me'. I am aware from the Camp Beagle Facebook page that
 7 this individual appears to have had a falling out with
 8 Camp Beagle, and has hit people in the camp with a metal
 9 bar, and is generally aggressive. I am aware that he
 10 has since been outside the site, but I have not had any
 11 contact or altercations with him."
 12 The reason I ask you about this is because it's in
 13 my evidence bundle. So we actually have something in
 14 common, we've both been threatened by Mr Neil. You've
 15 been threatened -- yes? -- or you find him intimidating;
 16 yes?
 17 A. Okay.
 18 Q. So the reason I appear in this paragraph is just the
 19 fact that I've also been attacked by this violent man.
 20 A. Hmm.
 21 Q. Okay. Right. That's finished on the evidence.
 22 Ah --
 23 MR JUSTICE NICKLIN: Can I ask, before we leave
 24 paragraph 112, when you say, "I am worried about the
 25 verbal abuse and physical danger from the protestors",

1 do you consider that you are worried that Mr Curtin may
 2 verbally abuse or pose a physical danger to you?
 3 A. No, just referring to like --
 4 MR JUSTICE NICKLIN: In general?
 5 A. Yes.
 6 MR CURTIN: Okay. I'd just like to ask -- I'd just like to
 7 finish on it just because I've got it mentioned here.
 8 One of your jobs is to deal with the police --
 9 A. Yes.
 10 Q. -- the police liaison. You haven't put it in your
 11 statement here, but -- so you have regular contact with
 12 the police in your role as security, as now head of
 13 security?
 14 A. Not so much now, but I did when the staff was conveying
 15 in and out of site.
 16 Q. Okay, but say if there was an incident, a security
 17 problem, then you would be the go-to man.
 18 Could you tell us -- other witnesses have spoken
 19 about it, about the anti-terrorist police coming and
 20 giving a presentation to MBR. Are you aware -- do you
 21 have any awareness of that, a meeting with the -- was it
 22 spoken about amongst your witnesses? Do you have any
 23 knowledge of it?
 24 A. I can't -- I've seen the police. I don't know where --
 25 a lot of them, where they come from.

1 Q. What about briefings by -- have you ever had a meeting
 2 where the police have given you briefings to give you
 3 their spin about protestors? Has that ever happened?
 4 A. They've been to site but I was not involved in that
 5 meeting.
 6 Q. You weren't involved in the meeting?
 7 A. No.
 8 Q. Is that before you were head of security?
 9 A. Yes.
 10 Q. Okay. Who is the meeting -- why weren't you there? As
 11 a security guard, you think you should have been there
 12 at that meeting?
 13 A. I have no idea the reason why --
 14 Q. You're vaguely aware of some police meeting but you
 15 weren't at it?
 16 A. No.
 17 Q. Okay. All right.
 18 MR JUSTICE NICKLIN: Are you aware of what was discussed at
 19 the meeting?
 20 A. No.
 21 MR CURTIN: That's all the questions I have.
 22 MR JUSTICE NICKLIN: Right. Thank you very much.
 23 Ms Jaffray?
 24 MS JAFFRAY: Hi, I don't have much to add to Mr Curtin's.
 25 Cross-examination by MS JAFFRAY

1 MS JAFFRAY: So, Mr Manning, can I just ask, you did mention
 2 you haven't been to a protest before nor have you seen
 3 one, so is it fair to say that you might have found the
 4 protests more — it might have impacted more on you than
 5 it would have done on others?
 6 A. Sorry, I can't quite hear.
 7 MR JUSTICE NICKLIN: Ms Jaffray, would you like to try and
 8 put that question again?
 9 MS JAFFRAY: Yes, okay.
 10 So you've mentioned that you have never experienced
 11 a protest before, you haven't been at one, nor have you
 12 seen one, so would you accept that that could have
 13 impacted on you more than others who have experienced
 14 one before?
 15 A. I'm not too sure. I can't comment on somebody else's
 16 opinion. I can only say about my own opinion.
 17 Q. Okay. I mean, you must have seen some on the TV or in
 18 the media?
 19 A. No.
 20 Q. Okay. So can I ask you, have protestors ever stopped
 21 staff cars from entering the site?
 22 A. Yes.
 23 Q. Was that back in the early days, do you remember?
 24 A. Yes.
 25 Q. And how did they stop them?

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1 A. By blocking and barricading the gate.
 2 Q. They barricaded the gate. Did they, to stop staff going
 3 in?
 4 A. Yes.
 5 Q. So I can say that the protestors had an agreement right
 6 at the very beginning that they would never delay staff
 7 going in to see to the dogs. Our whole campaign is
 8 about protecting the dogs, saving the dogs. We'd never
 9 stop people from going in who were there to feed them,
 10 clean them out.
 11 A. Okay.
 12 Q. So would you accept that potentially this didn't happen
 13 and it was only when staff were leaving the site that
 14 there might have been issues?
 15 A. There's been a couple of occasions when they have
 16 stopped them coming.
 17 Q. Okay. Sorry, let me just have a quick look. Okay, so
 18 point 93, you said there:
 19 "The long-standing protestors ..." —
 20 MR JUSTICE NICKLIN: Wait a minute.
 21 MS JAFFRAY: Sorry.
 22 MR JUSTICE NICKLIN: Paragraph 93, I think. Was it 93,
 23 Ms Jaffray?
 24 MS JAFFRAY: Yes.
 25 MR JUSTICE NICKLIN: We're just getting it.

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1 A. Yes.
 2 MS JAFFRAY: Okay. About halfway down:
 3 "The long-standing protestors are aware of what they
 4 are [as in with regard to the injunction rules] and are
 5 not allowed to do, but they claim it is not their job to
 6 police others."
 7 Which would you say is fair, that it's not their job
 8 to police others?
 9 A. Yes.
 10 Q. Yes?
 11 A. Yes.
 12 Q. So that is down to having the injunction rules in
 13 a place where everybody can see them?
 14 A. Yes.
 15 Q. Yes, okay. When you wrote your statement, did the
 16 police have any involvement with these or did you do
 17 them yourself or with solicitors?
 18 A. What, was the police helping me with my statement?
 19 Q. Yes.
 20 A. What, this one here?
 21 Q. Yes.
 22 A. No, they wasn't involved in it.
 23 Q. They weren't, okay. So can I just bring your attention
 24 to one incident where you have said that you've been
 25 informed by the police that — sorry, I'm on number 79

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1 if that helps.
 2 A. 79?
 3 Q. Yes.
 4 A. Yes.
 5 Q. So you say there that — you state you have been
 6 informed by the police that I obtained your home address
 7 through accessing NHS records at work.
 8 A. Okay.
 9 Q. Were you explicitly told that or have you made the
 10 assumption?
 11 A. We was told — I was told by police.
 12 Q. Specifically that I used NHS systems to access home
 13 addresses?
 14 A. They said that they was looking into the possibility
 15 of — that that's how you obtained my address.
 16 Q. So looking into the possibility, not that I had done
 17 that?
 18 A. Well, the last time I got an update on it is they was
 19 investigating it.
 20 Q. Right. Okay. Just to clear that up, that was proved
 21 incorrect.
 22 Point 81, at the very end of that —
 23 MR JUSTICE NICKLIN: Before we leave that point, Ms Jaffray,
 24 let me just ask — if you look at the sentence that
 25 says, "I was also informed by the police that they [had]

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1 reason to believe [that Ms Jaffray] obtained my home
 2 address ...", would it be fairer, in light of what
 3 you've said, to say they were investigating whether
 4 Ms Jaffray had obtained your home address or were they
 5 clear that they actually suspected or had reason to
 6 believe that that was the case?
 7 A. That's what they said --- they told us, that they
 8 suspected that she was ...
 9 MR JUSTICE NICKLIN: They suspected that she was, right.
 10 A. Yes.
 11 MS JAFFRAY: Okay. Point 81, you mention that you've been
 12 assaulted. Do you mean physically assaulted?
 13 A. 81?
 14 Q. Yes.
 15 A. So I'm not too sure where it says I've been assaulted.
 16 MR JUSTICE NICKLIN: At the bottom of that paragraph 81.
 17 A. Sorry, what was the question?
 18 MS JAFFRAY: So it says at the end of point 81 that you have
 19 been assaulted. Have you been assaulted physically by
 20 a protestor?
 21 A. From one of my neighbours, yes.
 22 Q. Okay. So I'm just --- just looking at the way this is
 23 written, it kind of insinuates that it was a protestor.
 24 I think Mr Curtin touched on that point though.
 25 So this is actually my last question. I think

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1 Mr Curtin has covered quite a lot.
 2 When you took on the role of a security officer at
 3 MBR, I'm guessing that --- or I would suggest that ---
 4 given the nature of the business, did you expect there
 5 might be an element of contempt by the public for your
 6 job there, for having any involvement in MBR?
 7 A. Sorry, say --- sorry, can you repeat the question?
 8 Q. Yes. So when you got your job as security officer at
 9 MBR ---
 10 A. Yes.
 11 Q. --- would you say that there was --- did you have any idea
 12 that there may be some opinions that --- some feelings of
 13 contempt of the public towards you, given what the
 14 nature is of MBR Acres?
 15 A. No, not really. I just went for a security job.
 16 MR JUSTICE NICKLIN: When you went for your job, did you
 17 have any real knowledge of what MBR Acres did?
 18 A. All I know is they bred dogs and that's it.
 19 MR JUSTICE NICKLIN: Okay. Did you know what they bred them
 20 for?
 21 A. Yes, medical research.
 22 MR JUSTICE NICKLIN: Right, okay.
 23 MS JAFFRAY: And you didn't think that that might cause
 24 any --- a reaction from the public at any point?
 25 A. No.

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1 MS JAFFRAY: Okay, I find that quite unusual. That is all
 2 actually that I have to ask.
 3 MR JUSTICE NICKLIN: All right. Thank you, Ms Jaffray.
 4 MR CURTIN: I forgot one point.
 5 MR JUSTICE NICKLIN: All right, go on.
 6 Further cross-examination by MR CURTIN
 7 MR CURTIN: Ms Jaffray asked you are you aware --- have
 8 people ever stopped workers coming on to the site. I'd
 9 like to remind you about one incident. I haven't got it
 10 in the bundle but let me see if I can refresh your
 11 memory. I do believe two Scottish people, if that makes
 12 any ... two people actually blocked the gate not so long
 13 ago, about a year ago, for quite a few hours in the
 14 morning --- two individuals. Do you remember that?
 15 A. Was that the people that walked from ---
 16 Q. The workers couldn't actually come in.
 17 A. Was that the people that walked from ---
 18 Q. Yes.
 19 A. Yes.
 20 Q. So they actually did block the entrance?
 21 A. Yes.
 22 Q. And you called --- did you call the police?
 23 A. Yes.
 24 Q. And what did the police do?
 25 A. My recollect(?) is they come down to I think speak to

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1 them about it.
 2 Q. And arrest them?
 3 A. Yes, I think they did.
 4 Q. They did arrest them. You've seen police officers on
 5 that random video I've shown you. There were police
 6 officers on the scene --- yes? --- whilst the
 7 protestors --- the protests were going on?
 8 A. Hmm---hmm.
 9 Q. Throughout every --- up until the injunction and beyond,
 10 every single day there were police attendants,
 11 especially when workers came in and out at the Wyton
 12 site; would you ---
 13 A. Yes.
 14 Q. Do you feel frustrated --- do you feel a sense of
 15 abandonment by the police, that they didn't do enough to
 16 help you? Because the police were there, there was
 17 obstruction happening, there was shouting, there was ...
 18 A. They're there to ---
 19 Q. As a security guard, did you feel the police were doing
 20 their job?
 21 A. Sorry, can you ask you me the first question first
 22 again?
 23 Q. Sorry. I have to ask it ---
 24 A. Ask me the first question again.
 25 Q. I forget what --- I can't even remember what I said.

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1 Let's deal with -- unless we can go to the transcript --
 2 no.
 3 I asked you did you feel at that time a sense of
 4 abandonment by the police, "The police aren't doing
 5 enough to help us"? The police are there, there's
 6 a demonstration, they're blocking the cars.
 7 A. The police do their job. That's it. I'm not there to
 8 tell the police what to do and what they can't do.
 9 Q. But on the occasion when the road was actually blocked,
 10 the police took affirmative action and made an arrest;
 11 yes?
 12 A. Correct, yes.
 13 MR CURTIN: Okay. Thank you.
 14 MS JAFFRAY: Sorry, can I just add one point there?
 15 MR JUSTICE NICKLIN: Very quickly. We're over lunchtime
 16 now, Ms Jaffray.
 17 MS JAFFRAY: Okay. It's very quick.
 18 Further cross-examination by MS JAFFRAY
 19 MS JAFFRAY: So, Mr Manning, can I just ask why there was
 20 a necessity to have the police there so often when
 21 surely security could have dealt with a lot of issues
 22 themselves? You are, after all, security --
 23 MR JUSTICE NICKLIN: No, that's not a legitimate question.
 24 Mr Manning can't comment on what he thinks the police
 25 should have done about various incidents so that's not

1 an appropriate question.
 2 MS JAFFRAY: Can I ask Mr Manning who would contact the
 3 police? Was that his job to contact the police for
 4 assistance?
 5 A. When?
 6 Q. Well, throughout the protest. Police used to assist the
 7 staff arriving and leaving. Would you speak to the
 8 police before this happened and ask for their assistance
 9 or would security try to facilitate that themselves?
 10 A. It wasn't myself that facilitated that, no.
 11 Q. So it wasn't for security to try to facilitate it before
 12 phoning the police for assistance?
 13 A. Sorry --
 14 MR JUSTICE NICKLIN: Okay, let's be clear. Mr Manning, in
 15 the early days, when you were not head of security --
 16 A. Yes.
 17 MR JUSTICE NICKLIN: -- whose responsibility was it to
 18 contact the police if it was felt that police needed to
 19 attend?
 20 A. Oh, sorry, on -- what every day sort of thing or on
 21 occasion?
 22 MR JUSTICE NICKLIN: On a general basis. If there was
 23 a need -- from your point of view, if there was a need
 24 for the police to attend, whose responsibility was it to
 25 call them?

1 A. It would be myself.
 2 MR JUSTICE NICKLIN: Right.
 3 A. When they used to come --
 4 MR JUSTICE NICKLIN: Regularly?
 5 A. Yes -- in and out, it's down to somebody else to ...
 6 MS JAFFRAY: Okay, and you felt there was that requirement
 7 to get the police to assist rather than security to try
 8 or at least attempt to manage it themselves?
 9 A. I would call the police when I felt it was necessary.
 10 MS JAFFRAY: Okay. Thank you. Sorry, that's all.
 11 MR JUSTICE NICKLIN: Right. Ms Bolton, if you've got
 12 questions, we'll need to take them after lunchtime.
 13 MS BOLTON: I only have one.
 14 MR JUSTICE NICKLIN: Go on then.
 15 Re-examination by MS BOLTON
 16 MS BOLTON: Mr Manning, you were asked by Mr Curtin whether
 17 you were aware of any physical attacks on the staff by
 18 a protestor and your answer was, no, you weren't aware
 19 of any physical attacks.
 20 A. I can't remember.
 21 Q. If I could ask you, please, to look at paragraph 59,
 22 page 982 in your witness statement, please.
 23 A. Paragraph 59?
 24 Q. Sorry, wrong page number. No, I am correct, I'm being
 25 told. Sorry. So page 982, paragraph 59, please. Now,

1 if I could ask you, please, to read to yourself that
 2 paragraph.
 3 A. Yes, yes.
 4 MR CURTIN: I don't have it.
 5 MS BOLTON: No, just read your paragraph. In fairness to
 6 you, you wouldn't have known.
 7 A. Yes, there was -- yes.
 8 Q. So does your answer to Mr Curtin still stand?
 9 A. Sorry, I did -- it was my mistake. Yes, I did forget
 10 about that. There was that one incident.
 11 Q. What did you forget about?
 12 A. The fact that one of the protestors came inside the gate
 13 and looked like she was going to hit me with a chair and
 14 she pushed me.
 15 Q. Can I ask you to read the rest of that paragraph,
 16 please? (Pause)
 17 MR CURTIN: Your Honour -- sorry, my Lord -- while he reads
 18 it -- I'm trying to save time here -- I haven't read the
 19 statement, but if I -- I know you want a break, but some
 20 other tactic(?) maybe, which I haven't read, "hit me
 21 with a chair", I'm just going to ask, did the police get
 22 involved and was he arrested?
 23 MR JUSTICE NICKLIN: Ms Bolton will let you see the
 24 paragraph that she's referred to. It answers your
 25 question. So you can have a look at that.

1 MR CURTIN: I've got it here.
 2 MR JUSTICE NICKLIN: Right. There you are.
 3 MS BOLTON: Mr Manning, earlier on you said to Mr Curtin
 4 that there hadn't been any physical attacks on the
 5 staff.
 6 A. I forgot about that.
 7 Q. Does your answer still stand?
 8 A. No, it doesn't, no. The answer would be "Yes".
 9 Q. Mr Curtin wouldn't have this because it's not an
 10 allegation against Mr Curtin, but it's obviously
 11 relevant more generally.
 12 MR CURTIN: One question. A one-word answer -- a one-word
 13 answer will do. Was that person arrested? Was it dealt
 14 with by the police and arrested?
 15 MR JUSTICE NICKLIN: Well, it says in the witness statement
 16 that the police didn't take any further action.
 17 MR CURTIN: Okay, thank you.
 18 MS BOLTON: My Lord, in all fairness to Mr Curtin, he
 19 couldn't have known that and it's not an allegation
 20 against him, but I -- because it's the witness' evidence
 21 in general, apologies, I had to go back to that one.
 22 MR JUSTICE NICKLIN: Right.
 23 MS BOLTON: My Lord, no further re-examination.
 24 MR JUSTICE NICKLIN: Right. Mr Manning, you'll be pleased
 25 to hear you've finished your evidence so that means you

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1 can talk to whoever you like over the lunchtime. Thank
 2 you for coming to give your evidence. You can stay for
 3 the rest of the proceedings if you need to, but if you
 4 have reason to leave, you're free to go now.
 5 Thank you to the court staff for sitting until ten
 6 past, sorry about that. We will reconvene at 2.10.
 7 Thank you very much.
 8 (1.12 pm)
 9 (The short adjournment)
 10 (2.11 pm)
 11 MR JUSTICE NICKLIN: Yes, Ms Bolton.
 12 MS BOLTON: My Lord, I call my next witness, Mr James Hardy,
 13 who was previously known as "Employee F".
 14 MR JUSTICE NICKLIN: Thank you.
 15 MS BOLTON: My Lord, the start of Mr Hardy's witness
 16 statement is at page 1425 in the persons unknown
 17 bundle -- well, 1423 is the heading but the text starts
 18 at 1425. Apologies.
 19 MR JAMES HARDY (affirmed)
 20 Examination-in-chief by MS BOLTON
 21 MS BOLTON: Mr Hardy, good afternoon. You should have in
 22 front of you a bundle of documents which should start
 23 with your witness statement. The first page of the
 24 proper text of the statement is on page 1425.
 25 A. Yes.

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1 Q. If you could just turn through momentarily to the end of
 2 that witness statement which is 1489 --
 3 A. Yes.
 4 Q. -- you should see your signature on that page.
 5 A. I do.
 6 Q. Also there should be an exhibit that follows that at
 7 1490 to 1520.
 8 A. What was then again? Sorry.
 9 Q. To 1520.
 10 A. Yes.
 11 Q. Is that the exhibit to your witness statement?
 12 A. It is.
 13 Q. Is the witness statement still true to the best of your
 14 knowledge and belief?
 15 A. Yes.
 16 MS BOLTON: Okay, Mr Hardy, there may be some more questions
 17 for you but I might suggest that you turn back to
 18 page 1425 so that you're at the beginning of your
 19 witness statement, so if you're taken to any paragraphs,
 20 you know where it is from the start.
 21 A. Thank you.
 22 Cross-examination by MR CURTIN
 23 MR CURTIN: You have to bear with me sometimes.
 24 So, Mr Hardy, how long have you worked for MBR?
 25 Have you long have you worked at the Wyton site?

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1 A. I have worked at the Wyton site for eight years.
 2 Q. Eight years. Did you work there prior to it being owned
 3 by MBR?
 4 A. I did.
 5 Q. When it was owned by Envigo?
 6 A. No.
 7 Q. Harlan Interfauna?
 8 A. I believe so, yes.
 9 Q. That merged into Envigo but perhaps they kept the same
 10 name. But you worked there prior to MBR Acres taking
 11 ownership.
 12 Would you say your job role was a sort of smooth
 13 change between the two? Was it the same job with the
 14 old owners as it is with the new owners, roughly,
 15 would you say?
 16 A. Yes, it continued to be the same.
 17 Q. It continued to be the same. The same set-up --
 18 A. Yes.
 19 Q. -- roughly? The same dogs?
 20 A. No.
 21 Q. Not beagles?
 22 A. Same dogs -- yes, same beagles.
 23 Q. They're beagles, but different breeds? What do you mean
 24 by different dogs, different type of ...
 25 MR JUSTICE NICKLIN: Over a period of eight years,

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1 Mr Curtin, they naturally come --- they can't be the same
2 dogs.
3 MR CURTIN: No, there's a different company ---
4 MR JUSTICE NICKLIN: I know.
5 MR CURTIN: --- Envigo beagles, so they were Envigo beagles,
6 so you worked with the --- but you worked with beagles?
7 A. Yes.
8 Q. When you took over, when the company took over, your
9 continuation carried on. How did that interchange take
10 place as far as the dogs were concerned?
11 A. I'm not sure what you ---
12 Q. Did you notice any difference between the Envigo dog and
13 the Harlan dog --- the MBR dog?
14 MS BOLTON: My Lord, that could in an extreme case even be
15 commercially sensitive, but, I mean, my Lord, I don't
16 think this is relevant to this witness' evidence ---
17 MR JUSTICE NICKLIN: Okay.
18 MS BOLTON: --- who he worked for previously, eight years
19 ago ---
20 MR JUSTICE NICKLIN: All right. Trust me, Ms Bolton, I'm
21 aware of what's relevant. I'm listening to the
22 questions. At a point where I think we're --- there's
23 a sort of --- I have to decide whether Mr Curtin is
24 setting the scene to a question or whether he's going
25 further down an irrelevant chain. It's not that I'm not

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1 paying attention and asking myself whether the questions
2 are relevant ---
3 MS BOLTON: My Lord, I'm sure.
4 MR JUSTICE NICKLIN: --- all right?
5 MS BOLTON: My Lord.
6 MR CURTIN: I'll go straight to the point that perhaps I'm
7 leading up to. We'll deal with your evidence as we come
8 to it, but you've worked there for eight years, so you,
9 above all people --- there's people that have worked
10 there longer than you, isn't there, but eight years is
11 a long time. As part of your job description, your job
12 role at the minute, in your evidence --- I think it's
13 point number 30 --- but whatever paragraph it is, in your
14 statement you say:
15 "I assume the protestors [know] what my ... role is
16 ..."
17 You wrote that. Do you remember writing that?
18 A. Which one was it, sorry? 30?
19 Q. Well, I think --- I've got it in my chaotic notes, if you
20 bear with me.
21 If I could be helped out by the prosecution. The
22 paragraph begins "I assume ..."
23 MS BOLTON: Paragraph 32.
24 MR CURTIN: Thank you very much. I apologise.
25 I'm here today to ask you what is your role. What

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1 is your role at MBR?
2 MR JUSTICE NICKLIN: Okay, why is that relevant?
3 MR CURTIN: I need to know who I'm speaking to. It goes to
4 the "puppy killer". How do you feel when you're called
5 a puppy killer? That's what I'm leading to.
6 MR JUSTICE NICKLIN: Let's just go to that and then see
7 where you go with putting the direct question.
8 MR CURTIN: Okay.
9 Are you aware of a project licence in force at MBR
10 that involves bleeding dogs, called the "bleeding
11 licence"? Are you aware of that?
12 A. I'm aware of that, yes.
13 Q. As part of that procedure, dogs are --- I was going to
14 say --- I was going to use the term "milked" for their
15 blood. Blood is a commercial product as far as Marshall
16 is concerned and they sell it and it will be --- is it
17 part of your job to extract that blood?
18 A. It is not.
19 Q. It's not? You have never taken part in the procedure?
20 A. No.
21 Q. But you're aware of the procedure?
22 A. I'm aware. I've never taken part.
23 Q. That includes the terminal bleeding?
24 A. Yes.
25 Q. You were sitting there when I put the case to

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1 Mr Manning. Because you work for this company and they
2 do --- Ms Pressick said that the idea of terminal
3 bleeding wasn't to kill the dogs. The fact that the
4 dogs died as a result of being emptied of all their
5 blood is a side issue for her. This company, your
6 company, MBR, kills puppies at the site; yes? I'll come
7 to another way you kill puppies in a minute but by
8 bleeding to death, MBR --- not you because you've said
9 you've never done it --- they kill puppies?
10 A. I'm aware that this happens, yes.
11 Q. There's a bleeding room --- I've read it on the freedom
12 of information --- there's something called a "bleeding
13 room" in your establishment, isn't there?
14 A. It isn't called a "bleeding room". It's more of
15 a procedure room.
16 Q. Forgive me. We'll call it a "procedure room".
17 Have you delivered dogs to that procedure room?
18 A. I have not.
19 Q. You haven't ever delivered a dog --- you're under oath.
20 A. No.
21 Q. You haven't? Okay, we'll come to your role in a minute.
22 When you were --- as an employee of
23 Harlan Interfauna/Envigo and you swapped over to MBR,
24 you stayed but the dogs didn't. What happened to the
25 Envigo dogs?

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1 A. We had a transition from the Envigo dogs to the Marshall
2 dogs.
3 Q. And tell me about that transition. Tell the court, if
4 you will, about that transition, how it -- what did it
5 mean?
6 MR JUSTICE NICKLIN: Why is that relevant?
7 MR CURTIN: Because -- it's my case that the entire stock
8 were killed --
9 MS BOLTON: No, my Lord, I'm going to object --
10 MR CURTIN: -- which makes him at that time -- and in
11 present day and back then. I'm just establishing what
12 it means to be a puppy killer.
13 MR JUSTICE NICKLIN: Yes, okay. Just wait there.
14 MS BOLTON: I do object to this for a number of reasons.
15 First of all, we're not privy to what Envigo did with
16 their dogs. I don't know what the position is. I know
17 that the position of what can and can't happen is
18 completely at the determination of the Home Office.
19 What happened on that occasion isn't part of our
20 evidence or part of this case and so I'm not quite clear
21 why it's relevant to this witness, who is giving
22 evidence about what has happened when he's tried to
23 access the Wyton site and at his home.
24 MR JUSTICE NICKLIN: Yes.
25 MS BOLTON: This isn't relevant to this case. This is

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1 simply asking about what a previous company did. It has
2 no relevance and it's not in writing in Mr Curtin's
3 evidence again. It's been no part of his case. We
4 haven't had a chance to address it. That simply takes
5 matters no further and it's not particularly fair on
6 this witness to be asking him about questions of what
7 Envigo may or may not have had to have done from the
8 Home Office because that's who will have decided what
9 the outcome was. I don't know what that outcome was and
10 I don't see that it's relevant to these proceedings.
11 MR JUSTICE NICKLIN: Mr Curtin, you can ask one or two
12 questions about this but you are not going to go any
13 further.
14 MR CURTIN: Okay, two questions.
15 MR JUSTICE NICKLIN: Well, let me do it.
16 Are you aware that -- when there was a transfer of
17 ownership, was there any euthanasias of the dogs that
18 you are aware of?
19 A. Yes.
20 MR CURTIN: Was it the entire stock?
21 A. No.
22 Q. Was it a substantial --
23 MR JUSTICE NICKLIN: That's it, that's it, because it's not
24 about whether it happened. It's about what you
25 believed. Now, I've allowed you to ask those two

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1 questions because they establish that your belief in
2 relation to what -- one of the protest motifs is why it
3 is that you say what you say. That's it. Right?
4 MR CURTIN: I'll move on.
5 MR JUSTICE NICKLIN: Right.
6 MR CURTIN: So what is your role?
7 A. As of today?
8 Q. What has been your role since --
9 MS BOLTON: But, my Lord, you've already said that's not
10 a relevant question.
11 MR JUSTICE NICKLIN: Yes. Mr Curtin, why are you asking
12 this question?
13 MR CURTIN: Because I personally witnessed this man -- as
14 far as moving the dogs around the site, he seems to be
15 the absolute key player in the site, the key -- he's one
16 of the --
17 MR JUSTICE NICKLIN: Okay, you're better off then
18 approaching it from the angle of you putting to the
19 witness what you say you've seen him do at the site.
20 MR CURTIN: Okay.
21 Would it be fair to say that your role in the
22 site -- it's not an admin role; correct?
23 A. Correct.
24 MS BOLTON: We're still --
25 MR CURTIN: It's a hands-on --

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1 MR JUSTICE NICKLIN: What's --
2 MS BOLTON: My Lord, I thought what you just asked Mr Curtin
3 to do is put to him what he's seen the witness doing,
4 not starting to try and whittle down the potential roles
5 in the company.
6 MR CURTIN: I've never seen him go --
7 MS BOLTON: I'm just referring to the point, my Lord, that
8 you said not --
9 MR JUSTICE NICKLIN: Yes, okay. Let's be clear. I'm the
10 judge. I will decide the ambit of the questions. I'm
11 aware of the objections. Let Mr Curtin ask his
12 questions, please.
13 MS BOLTON: My Lord.
14 MR CURTIN: I have witnessed you going in and out of the dog
15 sheds and moving dogs around the sheds, so your role is
16 a hands-on role --
17 A. Yes.
18 Q. -- inside the dog sheds?
19 A. Yes.
20 MR CURTIN: Is this an opportunity where I can show the
21 witness the evidence of the undercover footage to -- if
22 he can establish whether this footage -- does he
23 recognise the footage as being the place where he works?
24 MS BOLTON: It's not in dispute.
25 MR JUSTICE NICKLIN: It's not in dispute.

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1 MR CURTIN: Okay.
 2 So you tell me you've never -- I put it to you that,
 3 as far as the workers go, you have a key strategic role
 4 in the physical maintenance of the dogs. I was going to
 5 say "looking after", but the physical maintenance of the
 6 dogs is one of your key roles?
 7 A. It plays a part as my role, yes.
 8 Q. Could I describe you as -- could I describe you as "the
 9 dog man"?
 10 A. No.
 11 Q. No, you wouldn't class yourself as the dog man?
 12 A. No.
 13 Q. I'm left in wonder at what this man does but I'm
 14 prepared to move on.
 15 In your evidence, which I'll come to, you talk of
 16 stress -- you talk of enjoying your job. Your work
 17 environment, I put it to you that -- I'm asking you,
 18 does your -- if there were no protestors, would you say
 19 your work environment would be stressful?
 20 A. The workload would be stressful sometimes, yes.
 21 Q. What about say, for example, the noise?
 22 A. No.
 23 Q. You don't find that a problem?
 24 A. No.
 25 Q. You work in a beagle breeding factory where the dogs

1 have no access to outside --
 2 MR JUSTICE NICKLIN: Mr Curtin.
 3 MR CURTIN: Oh, okay -- where the dogs are enclosed --
 4 MR JUSTICE NICKLIN: Let me just make something clear
 5 because it may help you with the remainder of your
 6 questions; okay? This is not an opportunity for you to
 7 seek to persuade the witness that he shouldn't be
 8 working at the facility --
 9 MR CURTIN: No, no, no.
 10 MR JUSTICE NICKLIN: -- okay --
 11 MR CURTIN: Yes.
 12 MR JUSTICE NICKLIN: -- or that what he does is
 13 objectionable, any of those things.
 14 MR CURTIN: It's lawful and legal.
 15 MR JUSTICE NICKLIN: Yes. Concentrate on his evidence, like
 16 you have done with Mr Manning, for example. Address the
 17 points that he makes in his evidence that concern you.
 18 MR CURTIN: Okay.
 19 MR JUSTICE NICKLIN: You don't need to establish, again --
 20 I say "again" -- that you have well-founded objections
 21 to what MBR Acres does; okay? It's not fair on this
 22 witness or any of the other witnesses who come and work
 23 for MBR for them to carry the burden of defending the
 24 company they work for. The question that I have to
 25 address at the end of the trial is the extent to which

1 each of these employees has been caused upset and
 2 distress in support of the claim that MBR is making for
 3 harassment and the extent to which any one of these
 4 employees complains of being intimidated, obstructed.
 5 Those are the issues I have to decide.
 6 MR CURTIN: Okay.
 7 MR JUSTICE NICKLIN: All right?
 8 MR CURTIN: I'll move on. What I was trying to lead to was
 9 that the job by its nature itself, for some people,
 10 would be deemed as stressful, smelly, noisy.
 11 MR JUSTICE NICKLIN: Why is that relevant? How's that
 12 relevant to any of the issues I have to decide?
 13 MR CURTIN: Stress levels.
 14 MR JUSTICE NICKLIN: Right. They're not complaining about
 15 that. They're complaining about having to confront the
 16 protestors when they come in and out of work.
 17 MR CURTIN: Right. Okay. I'll move on.
 18 Can I direct you to paragraph number 6, please, of
 19 your statement? The first sentence, paragraph 6 -- have
 20 you got it?
 21 A. Yes.
 22 Q. "During the summer of 2021, the protests outside the
 23 Wyton Site became more intense, and it was not possible
 24 to enter or exit the Wyton Site safely."
 25 A. Sorry, hang on, I think I've got somebody else's --

1 Q. Paragraph 6.
 2 MS BOLTON: It should be on page 1426.
 3 A. Sorry, say that again.
 4 MR CURTIN: Paragraph 6, first sentence:
 5 "During the summer of 2021, the protests outside the
 6 Wyton Site became more intense, and it was not possible
 7 to enter or exit the Wyton Site safely."
 8 You were sitting there listening to Mr Manning's
 9 evidence and I think I put the same sentence word for
 10 word. I'll just ask you about the -- I'm just coming on
 11 to the word "safety". It's my case to you, noisy,
 12 elements of craziness, chaotic, but safety? There was
 13 no attacks on the vehicles at the inception. You say
 14 "During the summer", so I'm suggesting to you, noisy,
 15 loud, protesting, that may have upset you, but as far as
 16 violence, no violence. Maybe a perception of violence
 17 from your imagination of what might happen but no actual
 18 violence.
 19 A. There was incidences where staff cars had been hit,
 20 windows had been hit, doors had been hit, handles had
 21 been pulled, so, therefore, our safety was a concern to
 22 us.
 23 Q. A concern, okay. I think you referred to it as
 24 "terrifying", not in that paragraph. You must forgive
 25 me.

1 MS BOLTON: I think paragraph 6.
 2 A. Yes, I can see that.
 3 Q. Yes.
 4 "It was, however, a terrifying experience ..."
 5 Going past -- I would ask you to -- do you want to
 6 stand by those words now, "terrifying"?
 7 A. Prior to the injunction, yes, it was terrifying.
 8 Q. And you've just spoken about there was some incidences,
 9 but, on the whole -- would you accept from me on the
 10 whole there were the police officers present all the
 11 time and it was of a noisy -- I'll go as far as -- as
 12 far as you're concerned in the car, frenzied and
 13 chaotic, but "terrifying" is --
 14 A. Yes, that's how I felt.
 15 Q. That's how you felt. Okay. I don't know if I should
 16 ask this question, but it is evidence against me:
 17 "I drive a white Mercedes ... with registration
 18 number Y12 HDY."
 19 It's a personalised number plate, isn't it?
 20 A. Yes.
 21 Q. So if you're worried about your identity, driving around
 22 in -- I'm not sure because I don't want to diminish the
 23 terror you feel -- did you ever feel at any point that
 24 you shouldn't drive round with a personalised number
 25 plate? Did it occur to you?

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1 A. No, that never ...
 2 Q. Okay. Paragraph 10, the last sentence, you talked about
 3 getting together in convoys, which I'm not going to go
 4 into because the idea of going from a convoy was
 5 Jane Read's idea, along with the police. It wasn't your
 6 decision to go in a convoy?
 7 A. No, it wasn't.
 8 Q. And you talk of a delay of getting in, anywhere between
 9 ten minutes and a couple of hours.
 10 A. Which paragraph is that one? Sorry.
 11 Q. Paragraph 10, the last sentence:
 12 "... the wait for confirmation that it was safe to
 13 start travelling to the Wyton Site would be anything
 14 between 10 minutes and a couple of hours."
 15 A. Yes.
 16 Q. I put to you that the norm -- the couple of hours
 17 perhaps happened once --
 18 A. No.
 19 Q. Think about it -- twice at the very most.
 20 A. It happened on quite a few occasions.
 21 Q. How many in -- I don't know even know what period you're
 22 talking about, but you say in the first -- you're
 23 telling me regularly that you were stopped for hours and
 24 hours and hours going into the morning?
 25 A. Yes, there was times when, during the week, we were

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1 delayed up to sometimes 10 o'clock/11 o'clock in the
 2 morning and as well during weekends.
 3 MR JUSTICE NICKLIN: Were those occasions when there were
 4 very large numbers of protestors present?
 5 A. Say that again, sorry.
 6 MR JUSTICE NICKLIN: Were those occasions when there were
 7 very large numbers of protestors present?
 8 A. Yes.
 9 MR CURTIN: I put it to you that was one occasion -- one,
 10 one, occasion.
 11 A. I find that incorrect.
 12 Q. How many then? Let's square down. How many at the
 13 most? What's the maximum that you were delayed by going
 14 in to -- I don't know how to --
 15 MR JUSTICE NICKLIN: Just let him answer. He's got the
 16 question.
 17 A. I would say ...
 18 MR CURTIN: Well, can I help you because you don't talk
 19 about in your statement?
 20 MR JUSTICE NICKLIN: No, Mr Curtin. It's really, really
 21 important.
 22 MR CURTIN: I'm sorry.
 23 MR JUSTICE NICKLIN: The witness is doing the best to
 24 think -- giving you the courtesy of thinking carefully
 25 from his memory about what he thinks his answer should

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1 be. You let him answer, please.
 2 MR CURTIN: I do sincerely apologise to him.
 3 A. I would say around on ten occasions.
 4 Q. Ten? Okay. Could you refer them to me, those serious
 5 occasions in your witness statement, please?
 6 A. There was times where --
 7 Q. No, in your witness statement.
 8 MR JUSTICE NICKLIN: No, no, that's not a fair process, for
 9 the witness --
 10 MR CURTIN: Isn't it?
 11 MR JUSTICE NICKLIN: -- to have to go through his own
 12 witness statement and then identify them.
 13 You can ask him about what he remembers of those ten
 14 occasions and he'll give you the best answer he can.
 15 Ms Bolton may -- because it's her responsibility to
 16 assist the witness in relation to specific matters that
 17 he's dealt with in his witness statement, she will deal
 18 with those as necessary.
 19 Right. Can you remember any of the incidents?
 20 A. There was times when the protestors would stand in front
 21 of the gate and not let us in. There was the time you
 22 referred back to earlier where two people stood in front
 23 of the gate --
 24 Q. That's two.
 25 A. -- and we tried to arrive at site and the police were

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1 talking to them to try and negotiate them moving and
 2 letting us in, which didn't happen, so we had to drive
 3 away and come back.
 4 There was times where there was dog crates piled as
 5 high as the gates and we couldn't get in; same for going
 6 out as well. There was times, as on some of the videos
 7 we saw earlier, where there was a number of protestors
 8 standing in a line as well.
 9 Q. Yes, and what I was talking about there was a couple of
 10 hours. I put it to you that you were delayed on two
 11 occasions and no more than that for hours and hours and
 12 hours.
 13 A. I would say there's around ten occasions where, if not
 14 more, we were delayed on coming in. I would say there
 15 would have been three or four occasions where we were
 16 waiting for long periods of time, more than a couple of
 17 hours.
 18 Q. And some of those instances were post injunction?
 19 A. Yes.
 20 Q. Okay. About your identity, concealing your identity --
 21 A. Sorry, which paragraph?
 22 Q. Paragraph 19.
 23 "I have now started ... (wearing a face mask ...)
 24 ..."
 25 A. Yes.

1 Q. When was this statement written? Is it dated?
 2 MR JUSTICE NICKLIN: 12 January this year.
 3 MR CURTIN: Of ...?
 4 MR JUSTICE NICKLIN: This year.
 5 MR CURTIN: So tell us about the history of hiding your
 6 identity, please.
 7 A. So when the protests started, one of the things that we
 8 didn't want to happen was our identity to be revealed,
 9 so we took the safety precautions of wearing sunglasses,
 10 hoods, hats, masks to cover up.
 11 Q. That was it at the beginning and then, once you
 12 realised -- we'll go into that -- when your identity
 13 became known, then you -- did you stop hiding your
 14 identity?
 15 A. Yes, hmm--hmm.
 16 Q. Am I right in thinking -- is there somewhere in this
 17 statement where you say, "Now I've reverted back to it"?
 18 So you stopped -- you started wearing masks --
 19 MR JUSTICE NICKLIN: Yes, it's paragraph 19. You're at it.
 20 MR CURTIN: Is it where he says "I have started to hide it
 21 again"? Is that correct, you hid your identity and then
 22 you unmasked and then you masked up again?
 23 A. I hid my identity at the beginning. Then, once my
 24 identity had been leaked through social media, driving
 25 in and out of site every day, being called by my name

1 and having my home address leaked out, I found it not
 2 much use in covering up because my identity was already
 3 out there. I was then advised by management to re--cover
 4 up to stop any of -- any more pictures of myself being
 5 put out there.
 6 Q. When? When was that?
 7 A. I don't recall a date.
 8 Q. Roughly?
 9 A. I think it was after the injunction.
 10 Q. Is that still the case today, that you mask your
 11 identity?
 12 A. No.
 13 Q. So you masked and then you unmasked and then you
 14 masked -- so where are you at the moment? Are you
 15 masking or not masking?
 16 A. Currently I don't mask because, again, my identity is
 17 still out there and having more personal threats and
 18 issues -- even though I've already covered up before,
 19 they were still happening, so I didn't -- I felt the
 20 need that I didn't need to cover up because the issue
 21 was still going on.
 22 Q. Okay. Let's go on to 21, then, which basically talks
 23 about your identity and your identity being out there
 24 and social media, people saying things about you --
 25 yes? -- which you report is causing a level of alarm --

1 yes?
 2 A. Hmm, yes.
 3 Q. -- or (inaudible). This is in my evidence bundle. Is
 4 there any evidence -- are you aware that I have ever
 5 disclosed your identity?
 6 A. I'm unaware of that.
 7 Q. It's my case that Camp Beagle -- are you aware that we
 8 have a social media site --
 9 A. Yes.
 10 Q. -- Camp Beagle, on Facebook and on Instagram?
 11 A. Yes.
 12 Q. Because you're a worker and because drone footage is
 13 captured of you driving in and out of the site, first of
 14 all I would accept there are -- if you pay attention,
 15 you -- someone who knew you might -- your face has
 16 appeared on Camp Beagle Instagram and Facebook. But
 17 what I put to you is that -- have you ever seen, for
 18 example, a rogues gallery of faces on Camp Beagle
 19 Instagram and Facebook? Think about it. Have you ever
 20 seen -- well, answer the question. I've asked you,
 21 do you ever remember something like a rogues gallery?
 22 A. Not -- I don't recall anything on the Camp Beagle
 23 Instagram or Facebook page, but I do recall it being
 24 posted with people associated with yourselves.
 25 Q. Okay, but not by me?

1 A. Not by yourself, no.
 2 Q. Bear with me, please. So the abusive messages -- it's
 3 in my evidence bundle -- have I ever sent you or
 4 am I responsible for any abusive message, or the next
 5 paragraph, sharing screenshots of your identity? Do you
 6 identify me as behind that?
 7 A. Not yourself, no.
 8 Q. Are you relieved -- is there any sense of relief when
 9 you see the Camp Beagle social media sites, over all
 10 this period, that you haven't been targeted? Is there
 11 a sense of relief in you that, as far as Camp Beagle
 12 social media goes, you have not been targeted?
 13 A. No.
 14 Q. There's no relief?
 15 A. No.
 16 Q. Would you prefer it, then, that there was a rogues
 17 gallery, "Here's Charles Hardy, here's his address"?
 18 Let the public hear that. That's what it would say,
 19 let --
 20 A. I would prefer that it wasn't out there, regardless who
 21 showed it.
 22 Q. You have no relief at all as far -- as the main
 23 Camp Beagle protest website, you do not -- there is no
 24 attempt to attack you personally. That's a no -- that's
 25 meaningless to you?

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1 A. I'm glad that it wasn't shared on there to my knowledge,
 2 yes.
 3 Q. Good. Right, paragraph 25, please. This is concerning
 4 your concerns about letter bombs and car bombs going
 5 back to a Huntingdon Life Sciences campaign and police
 6 involvement -- in fact the anti-terrorists.
 7 A. Hmm--hmm.
 8 Q. I want to talk about that. Okay. You've got some
 9 awareness of the Huntingdon Life Sciences campaign from
 10 staff members who worked there, who worked at the Wyton
 11 site at the time of the Huntingdon Life Sciences. We're
 12 going back decades on that, aren't we --
 13 A. Yes.
 14 Q. -- back to the -- way back to the last century really
 15 and the beginning of 21st century --
 16 A. Yes.
 17 Q. -- so historical, and everything you know about this is
 18 from what you've been told?
 19 A. From what I've been told and as well, after being told,
 20 it's stuff I've seen on the internet.
 21 Q. We'll come to that. So you've done your own research
 22 about bombs and --
 23 A. Minimal.
 24 Q. -- aggressive campaigns?
 25 A. Very minimal.

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1 Q. Now:
 2 "Also, a police Anti-Terrorism team came to give us
 3 a presentation and used some of the Huntingdon Life
 4 Science bombing attacks as examples."
 5 Please expand on this. When was it?
 6 A. I don't recall a date.
 7 Q. Roughly? The first year?
 8 A. I don't know.
 9 Q. The second?
 10 A. I don't know the date.
 11 Q. Try and think. Was it the --
 12 A. Towards the beginning of it all.
 13 Q. So maybe in the first six months?
 14 A. Maybe longer than that. I can't give an exact ...
 15 Q. But not in the past six months?
 16 A. No.
 17 Q. More likely in the first year?
 18 A. Prior to the injunction.
 19 Q. And how do you know they were the anti-terrorism team?
 20 A. Because we was informed by management.
 21 Q. Okay. Was that a group meeting or was it just you?
 22 A. From what I can remember, one person came from that
 23 sector and gave us a talk on various different issues.
 24 Q. And who did they address it to? Just you?
 25 A. Staff as a whole.

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1 Q. All the staff? Because Mr Manning has no remembrance of
 2 it. Was it selective?
 3 A. All the animal-related staff.
 4 Q. All the animal-related staff, meaning ...?
 5 A. All the animal technicians and there was a few admin
 6 people as well.
 7 Q. So entire staff -- not just the animal, some admin
 8 people as well?
 9 A. Yes. Security was not involved though.
 10 Q. Security was not involved.
 11 What did they tell you about these bomb attacks?
 12 A. So they ran through various different things that had
 13 gone on, so the car bombs, the letter bombs, and it was
 14 mainly just to brief us on how we can deal with that if
 15 it happens because obviously it has happened. So if we
 16 were to suspect that that was happening to us, it was
 17 more of a briefing to understand and tell you how to
 18 deal with that best.
 19 Q. So it was informative, but it would have caused you some
 20 level, I imagine -- to hear of bomb attacks --
 21 A. Yes.
 22 Q. -- it would have been alarming and distressing?
 23 A. Yes.
 24 Q. And needless to say that hasn't turned out -- there's
 25 been attacks on people's houses --

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1 A. Yes.
 2 Q. -- we've heard, some, but the MBR campaign bears no
 3 relation to the Huntingdon campaign of decades ago, to
 4 the levels of action that people took.
 5 A. Yes, but --
 6 Q. Do you agree with that?
 7 A. -- we are aware that protestors that are against the
 8 industry went to extremes of that level.
 9 Q. It did. And it was based on history; yes? It was based
 10 on historical?
 11 A. Yes.
 12 Q. Okay. Another witness speaks -- I don't know if it was
 13 the same police briefing meeting -- of a tactic used by
 14 protestors where they kind of want to be hit by a car.
 15 Was that in that same police meeting? Do you remember
 16 that?
 17 A. I don't recall that, no, personally.
 18 Q. Okay. Paragraph 27, you talk about some fears where you
 19 keep your car door locked and your windows up. Is
 20 that based on one employee telling you that this
 21 happened to them -- yes? -- your level of fear about
 22 keeping your ...?
 23 A. Due to the large volume of protestors surrounding our
 24 cars, it was something that we would do regularly
 25 anyway, but after hearing from a couple of other

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1 colleagues that their door handles -- that they had
 2 heard their door handles being pulled, it was something
 3 that we would routinely make sure had been done.
 4 Q. Did they report that to the police, do you know?
 5 A. I don't recall that. I don't know.
 6 Q. Okay. Did anyone ever try and enter anyone's car that
 7 you know?
 8 A. Well, I would suspect that pulling door handles would be
 9 an attempt at that, yes.
 10 Q. If that had happened to you, would you report that to
 11 the police, that someone tried to get into your car?
 12 A. Probably, yes.
 13 Q. I'm not aware of any reports to the police about the
 14 incident you talk about, but anyway.
 15 Paragraph 30, please. You give a list of protestors
 16 that you know:
 17 "I am aware ... [with] the assistance of the
 18 Claimants' ..." --
 19 MR JUSTICE NICKLIN: "Without the assistance".
 20 MR CURTIN: Sorry, "without the assistance".
 21 Then you go on to say:
 22 "There are other protestors at the Wyton Site who
 23 I recognise by sight, but who are just making
 24 their views known, and not doing anything especially
 25 'wrong' ..."

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1 And you put it in quote marks.
 2 A. Yes.
 3 Q. So these people you've identified, these are the wrong
 4 ones, then? These are the people who do wrong things?
 5 A. These are people who I can identify.
 6 Q. No, these are -- there are others, but they're not --
 7 " ... who I recognise by sight, but who are just making
 8 their views known, and are not doing anything especially
 9 'wrong' ..."
 10 It's as if you're trying to pick out a list of names
 11 here and I'm one of them, as if I'm doing something
 12 wrong by protesting.
 13 MS BOLTON: Can you fairly take the witness to the whole of
 14 the paragraph because I think all of those sentences are
 15 important to your question.
 16 MR CURTIN: Okay.
 17 In the course of my protesting, do you think I've
 18 done things that are wrong?
 19 A. In your course of protesting, I believe that there are
 20 things that you've done wrong, yes.
 21 Q. Such as ...? Could you go to them in your witness
 22 statement or can you think of any off the top of your
 23 head?
 24 A. There's times when you've verbally abused myself and
 25 other colleagues.

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1 Q. Meaning what? Expand on that.
 2 A. Name-calling.
 3 Q. Name-calling? Not by your name?
 4 A. No, by other names.
 5 Q. Such as ...?
 6 A. "Monster".
 7 Q. "Puppy killer"?
 8 A. "Puppy killer", "monster".
 9 Q. And that's wrong --
 10 A. I believe so, yes.
 11 Q. -- in your beliefs? Can you see another point of view
 12 where people would -- I don't see it -- would you
 13 understand how I don't see it as wrong to call you
 14 a puppy killer?
 15 Is that a question? You think it's wrong for me to
 16 call you a puppy killer. Can you see another point of
 17 view where people understand why someone calling you
 18 a puppy killer could be perfectly understood, correct
 19 and a normal part of protesting? Do you understand
 20 that?
 21 A. No, could you make it a bit more clear?
 22 Q. Have you got some notion -- you're saying it's wrong.
 23 I'm asking you: are you aware that there are people who
 24 would look upon me calling you a puppy killer in the
 25 context of a demonstration -- not following you down the

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1 high street, but in the form of a demonstration, of
 2 calling you a puppy killer -- are you aware that that
 3 could be seen as legitimate? Are you aware that other
 4 people could have that point of view?
 5 A. Yes, everyone's entitled to their own opinion.
 6 Q. Good. In 32 you've seen comments online and on Facebook
 7 such as -- so you've been named on Facebook, and my
 8 name, which we know now -- you're not witness F, you're
 9 known as ...
 10 A. Yes.
 11 Q. That's not me. Do you hold me responsible for ever
 12 saying that? It's in my evidence bundle.
 13 A. I don't hold you responsible for that, no.
 14 Q. Okay. Moving on. Can we watch video 24, please, from
 15 ...
 16 MR JUSTICE NICKLIN: Do you want to set the scene,
 17 Mr Curtin, or were you just going to watch it?
 18 MR CURTIN: Let's watch some of it.
 19 (Video played)
 20 Stop there. And that's -- you've identified me,
 21 5.8.1:
 22 "Mr Curtin continually shouted at me through
 23 a megaphone [as read]."
 24 A. Sorry, what page is that in the bundle?
 25 Q. Sorry, paragraph 58.

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1 MS BOLTON: It's page 1439.
 2 A. Which point? Sorry. 58?
 3 MR CURTIN: You can hear me on the megaphone -- and maybe
 4 we'll come to this point because we've got a timeline --
 5 but I invite you to believe that that's me with that
 6 sort of gravelly voice on the megaphone. It's like
 7 a toy megaphone, but we'll come to that.
 8 I would say this would be a typical scene for back
 9 then in July. This is two weeks into Camp Beagle.
 10 A. It varied on different days.
 11 Q. Yes, but you can -- it sort of brings back memories of
 12 that's what it was like, a typical scene. To be honest,
 13 I'm not sure what's coming, we can play this a lot
 14 more --
 15 A. I wouldn't call it "typical".
 16 Q. -- but let's have a look. So let's carry on.
 17 (Video played)
 18 Stop there. Can you see the police officers?
 19 A. Yes.
 20 Q. There's two officers in front of the car and I do
 21 believe that's a police officer behind the car. Is that
 22 your car, by the way?
 23 A. That is my car, yes.
 24 Q. Oh, no, you're the last one.
 25 A. That's my car.

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1 Q. That's your car. So you've got two police officers in
 2 front, one police officer behind, you've got Mr Manning
 3 there --
 4 A. That's not a police officer behind. That's a security
 5 guard.
 6 Q. Oh, is it?
 7 A. Yes.
 8 Q. It looks like -- yes, no problem. They're both the MBR
 9 side of the fence and not getting involved with the
 10 protestors. That's correct, isn't it? That's what we
 11 can see?
 12 A. I don't know their involvement. I can see they're
 13 behind the gates.
 14 Q. Yes, and the police officers. Now, what's your view of
 15 the police's role in this? You can see the police
 16 there. You're talking about being terrified at scenes
 17 just like this. Did you want more help from the police?
 18 Were you frustrated about the lack of police action in
 19 a situation like this?
 20 A. Yes.
 21 Q. Why?
 22 A. I feel like they could have done more to help us.
 23 Q. But what about helping -- do you understand how the
 24 police have a duty to facilitate a protest --
 25 A. Yes.

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1 Q. -- so it's not all about you in this situation. Your
 2 safety must be looked after by police, but also the
 3 police must look after the safety and facilitate the
 4 protest but you have some level of frustration.
 5 Would you have liked the police to step it up a bit
 6 maybe?
 7 A. Yes.
 8 Q. Okay. On the megaphone -- I could take you back to it
 9 if you want -- I think I'm saying things like "Puppy
 10 killers, is this what you want to do? Did you have an
 11 ambition when you were at school to be a puppy killer?".
 12 My point to you -- and I'm not directing it at any
 13 particular individual -- I'm making generic comments
 14 about the employees of MBR. Would you accept that would
 15 be a typical thing to be heard or do you feel every time
 16 you hear "puppy killer" -- here's my question: when I'm
 17 on the megaphone then and saying "Puppy killers, is
 18 that what you wanted to do at school, is end up as
 19 a puppy ...", did you take that personally?
 20 A. Yes.
 21 Q. You did. Do you think -- is there any chance that you
 22 would be mistaken, that it was never about you, even
 23 though it felt like about you? I can understand how you
 24 come to that, but it's actually all the workers,
 25 including the security and including the ones -- you're

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1 a hands—on dog whatever you are — because I don't
 2 know — but do you understand how it could be never
 3 personal against you, those comments?
 4 A. Well, I would be unaware of that.
 5 Q. Okay, you would always take it personally when you hear.
 6 Okay, let's carry on — you can see people here —
 7 MS BOLTON: My Lord, is it an Opus break time? I'm just
 8 conscious ...
 9 MR JUSTICE NICKLIN: Yes, shall we have our break now?
 10 MR CURTIN: Yes, please.
 11 MR JUSTICE NICKLIN: All right. Mr Hardy, thank you very
 12 much. You mustn't discuss your evidence during the
 13 break.
 14 A. Okay, yes.
 15 MR JUSTICE NICKLIN: I think we'll finish your evidence
 16 today, but it's mainly to — it's for your own
 17 protection so nobody suggests that you've been
 18 influenced in any way; all right?
 19 A. Yes, thank you.
 20 MR JUSTICE NICKLIN: Thank you very much. 3.20, please.
 21 (3.01 pm)
 22 (A short break)
 23 (3.26 pm)
 24 MR JUSTICE NICKLIN: Not now. We're not dealing with that
 25 email now.

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1 MS BOLTON: I can just clarify very quickly, my Lord, that's
 2 the old —
 3 MR JUSTICE NICKLIN: I know it is. I was proposing to
 4 respond to say it doesn't have any effect anymore.
 5 MS BOLTON: No, absolutely not. Yes.
 6 MR JUSTICE NICKLIN: Okay.
 7 MS BOLTON: Well, not in relation to this site anyway.
 8 MR JUSTICE NICKLIN: Yes.
 9 Right. Carry on.
 10 MR CURTIN: I'll carry on. I think I briefly want to refer
 11 to three videos, a couple more questions and I'm done.
 12 Did we begin to watch this video —
 13 A. Yes.
 14 Q. — the 174?
 15 I think we can move on from that because it's your
 16 evidence that I was using the megaphone and then there's
 17 a series of — there's something I do want to address,
 18 but in the rest of the video, if you could take it from
 19 me, I'm not mentioned and you mention there's some
 20 (inaudible).
 21 (Video played)
 22 MR JUSTICE NICKLIN: Stop playing the video, please.
 23 You need to make clear whether we're playing the
 24 video or not; all right? So we're not playing the
 25 video?

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1 MR CURTIN: I'm satisfied that as long as Mr Hardy — the
 2 allegation against me, I accept, in his witness
 3 statement, that I'm using the megaphone, and then I've
 4 got no more involvement with it so we don't have to
 5 watch this video anymore.
 6 MR JUSTICE NICKLIN: Right. Carry on then.
 7 MR CURTIN: I do want to point you to — in relation to,
 8 though, but we don't need to watch it, paragraph 59, it
 9 relates in some way to what I talked to you about
 10 before, do you feel frustrated with the police. You
 11 actually say:
 12 "I also think the police ... could have done more on
 13 this occasion ..."
 14 A. Yes.
 15 Q. So the police were there, you felt you needed a bit more
 16 protection and it wasn't forthcoming from the police?
 17 A. That's correct.
 18 Q. So the police were there.
 19 Paragraph 61:
 20 "I felt annoyed that the protestors were delaying me
 21 ..."
 22 Later on in the paragraph:
 23 "... I knew I would get delayed ..."
 24 So annoyed about getting delayed. This is
 25 understandable, but I would ask you — this is closer

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1 to — I don't know how you were feeling. In relation to
 2 being frustrated and terrified — you're capable of
 3 having both feelings — which would be — in this
 4 particular instance, with people waving flags in front
 5 of you, would that be in the terrifying or would that be
 6 in the frustrating element, this particular video?
 7 A. There's always the aspect of terror because, as far as
 8 I'm concerned, the behaviour of the protestors is
 9 uncertain. In this video, it was very — it was
 10 frustrating as well.
 11 Q. Okay. Let's move on to the next video which relates to
 12 section 65. It's video 170 but I just propose to show
 13 you the first opening clip and we'll stop there.
 14 (Video played)
 15 We can stop it there. You've seen this video
 16 already this morning, from the back of the court, but
 17 not as someone in the dock.
 18 A. Yes.
 19 MR JUSTICE NICKLIN: Witness box.
 20 MR CURTIN: Sorry. Big difference.
 21 But I just invite you — because based on your
 22 statement, you say I'm there but there's no — I don't
 23 feel there's any particularly bad allegations against
 24 me. I'm there and — I would ask you this: in this
 25 video, as I put to Mr Manning, I'm taking the banner

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1 down. Definitely in that early period, have you got any
 2 recollection of me immediately identifying — maybe you
 3 didn't know my name at that point, but, "I wonder who
 4 that guy is. He seems a bit of a mover and shaker. He
 5 seems to have a bit of influence in the way that things
 6 are proceeding". Do you have any recollection of having
 7 any of those sort of — you don't?
 8 A. No.
 9 Q. No. I don't think we need to show any more of this
 10 video then because —
 11 MS BOLTON: Is the witness' paragraph being challenged, can
 12 I just be clear, because he was taken to paragraph 65
 13 and he hasn't been taken to the part of the video that
 14 is in the time stamp in paragraph 65 so I just want to
 15 be clear that that's not being challenged because
 16 otherwise he needs to be taken to the right time stamp.
 17 MR CURTIN: It just says that I'm there, doesn't it?
 18 MS BOLTON: 11.42.06.
 19 MR CURTIN: "... as I sought to ..."
 20 Yes, I won't be challenging.
 21 MS BOLTON: All right. I was just checking.
 22 MR CURTIN: Thank you.
 23 MR JUSTICE NICKLIN: I think the allegation is that you were
 24 obstructing the vehicles leaving the site.
 25 MR CURTIN: Okay. Having watched it already, I'm definitely

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1 one of the protestors, but we would have to watch the
 2 thing again to show the time that — when
 3 I particularly — I put it to you on this occasion —
 4 MR JUSTICE NICKLIN: Right, let's watch the video and then
 5 you put the question; all right?
 6 MR CURTIN: I was just thinking about time, but we shouldn't
 7 worry this time.
 8 MR JUSTICE NICKLIN: That's all right. Carry on.
 9 (Video played)
 10 MR CURTIN: Can we fast-forward it slightly?
 11 MR JUSTICE NICKLIN: You can, yes.
 12 MR CURTIN: With the confidence of this man, keep going
 13 forward and I'll tell him to stop — if you can keep
 14 going forward in ten-second intervals, when is it that
 15 I'm blocking ...
 16 Watch me now. I'm in front of the car and I turn,
 17 pushing people back and encouraging people to go back,
 18 not blocking.
 19 A. That's not my car.
 20 Q. Can you see that? Pardon?
 21 A. That's not my car.
 22 Q. Ah. Well, the general convoy. Your car comes in
 23 a minute and maybe we can just watch that. If you keep
 24 going forwards in little incremental skips. Stop it
 25 when I block.

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1 A. Can we stop doing the ten-second thing and just watch it
 2 all the way through as normal? Is that okay?
 3 MR JUSTICE NICKLIN: Tell me where you want to go back to.
 4 Pause, please.
 5 A. Before I come out of the band(?), so before the black
 6 and yellow, can we watch it ...?
 7 MR JUSTICE NICKLIN: Okay, so when the car — go back to the
 8 when the car — before it crosses the yellow and black
 9 hatched area. Right. Play it from there at normal
 10 speed. Don't ask any questions.
 11 (Video played)
 12 MR CURTIN: That's me there with the yellow vest, I'll
 13 remind you, as you've said, on the megaphone. Police
 14 officer present. At what point do I —
 15 MS BOLTON: Can you keep from ...
 16 MR CURTIN: Sorry.
 17 A. This point here.
 18 Q. Okay, stop. So there's a police officer and she is
 19 instructing other protestors to move to one side, she's
 20 kind of directing you as well, and I'm behind that,
 21 directly behind that police officer.
 22 MS BOLTON: If we could go to 4.10.
 23 MR CURTIN: 4.10, please do.
 24 A. I would say that you were more in front of the police
 25 officer.

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1 Q. Okay. I would challenge that, but let's move on. If we
 2 can go to — I don't need to show any more of this
 3 video.
 4 MR JUSTICE NICKLIN: Okay, thank you.
 5 MR CURTIN: Dashcam, if I could show you the same — the
 6 dashcam of the same incident, when you turn left and you
 7 drive down the road and someone blocks you. 808?
 8 MS BOLTON: 828.
 9 (Video played)
 10 MR CURTIN: If we could skip, skip, skip —
 11 MR JUSTICE NICKLIN: No, just let it play.
 12 MR CURTIN: But it's of no relevance to me apart from when
 13 it goes to the road —
 14 MR JUSTICE NICKLIN: No, it's a better view of where you are
 15 and whether — ultimately it's going to be for me to
 16 decide whether you're actually obstructing in that sense
 17 there, but we'll watch it because it's helpful to see
 18 what goes on.
 19 MR CURTIN: Yes.
 20 Can we stop there, where we stopped before —
 21 MR JUSTICE NICKLIN: Yes.
 22 MR CURTIN: — and slightly go back so we can see the police
 23 officer? There. Police officer available, police
 24 officer there?
 25 A. Yes.

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1 Q. Protestor in the road now?
 2 A. Yes.
 3 Q. Would you have any level of -- sorry, again, the police
 4 officer -- well, you haven't been stopped yet so let's
 5 carry on. Carry on for just a few seconds until your
 6 vehicle comes to a stop. So you've been stopped now by
 7 this protestor --
 8 A. Yes.
 9 Q. -- and there's a police officer immediately to your
 10 right, isn't there?
 11 A. Yes.
 12 Q. But then I invite you to -- the next thing that's going
 13 to happen is I'm going to come in from the left, have
 14 a word and then the situation ends. Ah, can we stop
 15 there? Can we listen -- could we go back just a few
 16 seconds? Can we listen -- can we have the soundtrack
 17 on? No.
 18 (Video played)
 19 I submit to you -- you call this woman a "pillock",
 20 I think. Would you accept you call this woman
 21 a "pillock"?
 22 A. That's not myself, no.
 23 Q. I apologise.
 24 (Video played)
 25 Stop that there. Go back a second till you see me

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1 on the left. Bit more -- slightly bit more. I invite
 2 you to look at my face and I sort of look at the driver,
 3 whoever it is, and say "Come on, you're good to go".
 4 I invite you to have that scenario in your head and see
 5 what you think; okay?
 6 (Video played)
 7 You get blocked again and boom.
 8 So what do you think of the scenario where, rather
 9 than blocking your vehicle, I unblocked your vehicle?
 10 Would you see that as an outrageous representation of
 11 what you just watched? It appears like that. I'd
 12 say -- would you come as far as it appears that I might
 13 be unblocking your passage?
 14 A. I would say that not only was the vehicle blocked from
 15 leaving the site freely, but also views onto the public
 16 highway were obstructed as well.
 17 Q. I'm talking about my role, what I did.
 18 A. I think everyone as a whole on that day, in that area,
 19 caused a blockage and views were obstructed, yes.
 20 Q. So my role on that day, you're saying, was to --
 21 A. As part of the group there, yes.
 22 Q. Including this incident?
 23 A. Not the bit down the road, no.
 24 Q. Ah, that's different. Then what? Then would you agree
 25 with me that I'm unblocking the road?

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1 A. I'm unaware of what you said, but from what I've seen,
 2 yes.
 3 Q. Okay. Good.
 4 If I can invite you to look at paragraph 99, and
 5 that's a description of the next video we'll watch, the
 6 last video, and it's (inaudible). Paragraph 99, video
 7 174. If I may request -- and your Lordship can -- will
 8 interfere. I will go, just for a matter of timing -- if
 9 we could -- okay, let me set the scenario. Now, you've
 10 called it unusual, haven't you, like being -- one like
 11 being in a film.
 12 A. Due to the volume of police, yes.
 13 Q. Due to the volume of police and kind of -- we'll watch
 14 the film -- you're kind of escorted out, and I play
 15 a role in this which we're going to come to. The police
 16 formed a line either side -- ah, "surreal", yes:
 17 "It felt surreal having a police escort. It was
 18 like being in a film [as read]."
 19 Now, whilst watching this, I would invite you to
 20 keep an eye on me because I'm defending myself, and I'm
 21 the person with the drum and I'm going to ask you at the
 22 end would you agree with this, that I'm taking part in
 23 this surreal -- and I would agree -- surreal occasion.
 24 It would be my case that this was prearranged with the
 25 police, that the cars are going to be leaving but

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1 they're going to be held up by a slow drum and by that
 2 way we -- the protestors get to protest and the workers
 3 get to leave. That's what I invite you to have -- that
 4 would be my defence about this incident and I'll be
 5 asking you about the event afterwards. I don't know --
 6 do you think it would be not suitable to speed it up,
 7 my Lord?
 8 MS BOLTON: It's 20 minutes and 40 seconds on this video and
 9 then you need to go into the second video for the second
 10 half of it.
 11 MR CURTIN: Yes, I see. It's not necessary -- if you could
 12 try and help me in paying attention to the person with
 13 the drum as we skip through it, as in skip in
 14 incremental -- would that be good?
 15 MS BOLTON: It's not -- it can't be skipped. If we're going
 16 to put it to the witness, you need to show that
 17 incident. That's --
 18 MR JUSTICE NICKLIN: We're going to have to watch more than
 19 20 --
 20 MS BOLTON: It's 20 minutes and 40 seconds, my Lord.
 21 MR CURTIN: I don't feel I need to.
 22 MS BOLTON: The last four minutes need to be played and then
 23 it runs into another video which is also relevant to the
 24 incident, so those last four minutes will be important.
 25 MR JUSTICE NICKLIN: Right. Go on then. Let's watch these

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1 four minutes then.
 2 MR CURTIN: If we can fast-skip to the last four. I'll
 3 interfere --
 4 (Video played)
 5 That's me there, the baldy, with his back to the
 6 police. I've got a drum in my hand and I'm slowly
 7 walking forwards. There's a load of police here. So
 8 a protest is happening and also workers are leaving.
 9 Can I stop there? So far I would say there's
 10 a level of control in this. You've called it "surreal",
 11 but you're leaving work quite clearly, there's lots of
 12 police and there's also protestors. Both things are
 13 happening. You're leaving and there's a protest.
 14 MS BOLTON: You then need to take video 200 to two minutes
 15 and five seconds, which is what picks up what happens
 16 when it goes onto the road.
 17 MR CURTIN: I would ask you if you can, because I'm
 18 (inaudible), keep an eye on me, if you can, the person
 19 with the drum.
 20 MS BOLTON: That's where you need to go to the other video.
 21 MR CURTIN: Let's keep skipping.
 22 MS BOLTON: It's a different video, Mr Curtin. It's
 23 a different video that you're in.
 24 MR CURTIN: I'm content to watch -- fast-forward it. Keep
 25 going, keep going. Keep going.

1 (Video played)
 2 Again, police, people are protesting, the worker has
 3 gone. That seems to be it.
 4 MS BOLTON: No, it's the rest of the incident --
 5 MR CURTIN: No, I understand. I'm saying for this section.
 6 Even though it's my witness -- I invite you to tell me
 7 when, if you could direct us to the point.
 8 MS BOLTON: If you go to two minutes and five seconds, it
 9 will pick it up from where you can see it's left off
 10 from the access road. Video 200.
 11 MR CURTIN: Excellent. Do you think it would be useful to
 12 watch the entire --
 13 MS BOLTON: If you watch it, you will see where it's
 14 relevant for your ...
 15 MR CURTIN: Yes. It would be my suggestion to speed it up.
 16 (Video played)
 17 There's me in the middle with my shiny head, with
 18 the drum. If you go forward.
 19 (Video played)
 20 I think you can stop there. I think maybe you
 21 identified the person next to me as Pauline Hodson,
 22 which you knew by name. There's two of us in front of
 23 the car and I'm one of them.
 24 A. Okay.
 25 Q. Yes? I'm the one with the drum. Go forward.

1 (Video played)
 2 Can we stop there for a second whilst I'm in shot?
 3 It would be my case that this was a form of funeral
 4 march, slow-paced funeral march, that you, surreally,
 5 are taking part in, but with the full acceptance of the
 6 police, a working relationship with the police. This is
 7 what was arranged for this day.
 8 A. Yes.
 9 Q. Keep going forward.
 10 (Video played)
 11 Stop there. You can see the person at the top
 12 middle of the screen, you can see my baldy head and
 13 that's me there with the drum.
 14 A. Okay.
 15 Q. Yes?
 16 (Video played)
 17 Can we stop there? I'm still there. You can just
 18 about make me out as a grainy figure. Can you see that,
 19 just about?
 20 A. Briefly, yes.
 21 Q. One of the ... I put to you, in a moment, my memory of
 22 this -- my defence will be that was prearranged with the
 23 police, and I will slope off. We've had some
 24 negotiation with the police, at what point can we
 25 actually go onto the highway and still continue this

1 slow pace.
 2 MS BOLTON: I'm sorry, my Lord, but can we just clarify
 3 what's meant by "prearranged with the police" because
 4 there was no -- as we understand it, any prearranged
 5 marches that were notified to the police or anything of
 6 that nature. Does what Mr Curtin mean that that they
 7 told the police that's what they were going to do at the
 8 time? Because it's not very clear. It's no part of his
 9 defence, and so can we just be very clear for the
 10 purpose of the witness as to exactly what Mr Curtin is
 11 saying was agreed and how.
 12 MR CURTIN: It would be my defence -- and I'll address the
 13 witness in this case -- the reason I've shown it is
 14 that, as an experienced protestor, I wanted to
 15 facilitate the protest. People here wanted to
 16 demonstrate their human rights. There was an element
 17 where people -- in my role as a police liaison officer,
 18 I was expressing a desire from the protestors to not
 19 just allow you complete free passage but to actually
 20 deliberately slow you up, but -- so you could see our
 21 banners in a funeral march. So in my role as a go-to
 22 police liaison person, this was a controlled -- nothing
 23 formal, on the ground, on the day, and that's what we're
 24 watching here.
 25 In a minute -- I watched this video in detail, but

1 I will slope off. There will be a prearranged point
2 where I'd said to the police, "We'll go ten yards or
3 20 yards up the road", and the police would be saying to
4 me, "No, ten yards", something along that ... but at
5 some point you're going to see me slope off and then the
6 cars will ... let's see what happens. Keep going
7 forward.

8 (Video played)

9 It looks like the last car on the right. Where were
10 you? I think that might be your car, is it?

11 A. My car is the last one, yes.

12 Q. So you're part of this convoy.

13 (Video played)

14 Can we stop there for a moment? So the person in
15 the front car, they've got more police around them, more
16 protestors. You haven't got many, but that's just
17 a coincidence. That's just where you've ended up in the
18 convoy; yes?

19 A. Yes.

20 Q. Okay. Carry on.

21 (Video played)

22 Can you stop the video there? So far would you
23 accept -- we've been skipping forward -- there's been
24 a continual forward moment. It's very, very -- it's
25 stop and start, but there's been a continual -- that's

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1 what we've just watched?

2 A. Very, very slowly, yes.

3 Q. Very slowly, And I don't know if we're about to have a
4 bit of a -- the cars are now bunched up. Let's see what
5 happens. Maybe some bunching, but I expect any minute
6 now that the road will be free.

7 (Video played)

8 Forward. There's no way of identifying myself --
9 the person with the drum there. If you stop the video
10 there, it looks like we've had some sort of -- that's
11 it. I would say -- my defence would be that's it and
12 all the protestors get it. Some of them might want this
13 thing to carry on a bit longer, but what's going to
14 happen now is, between the police and the protestors,
15 there's some mutual agreement kind of thing and the cars
16 are about to continue on the road now, hopefully.

17 (Video played)

18 There's your car at the back. Okay. You talked in
19 your previous statements about the frustration. On that
20 incident there, between frustration and terror, which
21 scale would you be on? You've answered in the previous
22 one that at any time, anything could happen, but on that
23 particular incident, between terror and frustration,
24 where were you?

25 A. Again, terror is still there in the back of your minds.

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1 We were unaware of how they could behave at any point
2 of a ... frustration played a big part in it because we
3 just wanted to go home.

4 MR JUSTICE NICKLIN: Did not the number of police present
5 reduce the level of terror?

6 A. No. I think that's what made it more surreal. Having
7 never experienced anything like this before, I think
8 that's what makes the whole moment very surreal.

9 I haven't -- you know, unexperienced in how to deal and
10 be in that situation.

11 MR CURTIN: Okay. The fact that you say you'd never been on
12 a demo ...

13 What about 20 months down the line? How terrified
14 are you 20 months down or is 22 months down? How
15 terrified are you -- if you would be going to work
16 tomorrow or Monday and you see some protestors, is your
17 level of terror diminished as the time's gone on, as
18 you've become accustomed?

19 A. Since the injunction has been in place, I would say that
20 my level of terror has dropped, yes, but there is still
21 the thought something could happen, as it has been
22 previously.

23 Q. Yes, but from your experience now, you personally --
24 you've had fear but nothing has actually happened to you
25 at the gates, apart from your fear and being delayed,

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1 but no -- there has been no attacks on you; is that
2 correct?

3 A. At the gates, no.

4 Q. Good. You talked in 141 about the limited change since
5 the injunction. You use the same language as
6 Mr Manning, that the cars are now intercepted.

7 A. Which paragraph?

8 Q. Sorry --

9 MR JUSTICE NICKLIN: Paragraph 141 on page 1463.

10 A. Okay, yes. I've got it.

11 MR CURTIN: You just talked about it then. There has been
12 a dramatic change, I would say, since the injunction.

13 A. Since the injunction, yes, but there are still times
14 when the injunction is broken.

15 Q. Yes, but before the injunction there were demonstrations
16 and you had your -- you had your feeling of terror, and
17 since the injunction there are still protests.

18 A. Say that again, sorry.

19 Q. Before the injunction --

20 A. Yes.

21 Q. -- there were protests and after the injunction there
22 are still protests?

23 A. Yes.

24 Q. If I can point you to 176 -- that's paragraph 176 --
25 that relates to an incident of two people who, since the

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1 injunction, deliberately seemed to block the road, block
 2 your passage coming into work; paragraph 176.
 3 A. Yes.
 4 Q. I don't know if you know the details of these two
 5 people. They blocked the injunction, they blocked the
 6 road and they were dealt with by the police.
 7 A. Sorry, I'm on the wrong page.
 8 Q. I put it to you that's correct, you're aware of the
 9 incident. Are you aware that people were arrested and
 10 charged with this?
 11 A. I am unaware of that.
 12 Q. I put it to you that's what happened because you
 13 can't -- with or without an injunction, no one is
 14 allowed to block the road out. The police are going to
 15 get involved, aren't they?
 16 A. Yes.
 17 Q. 226 in your statement, you say:
 18 "There [are about] 10-15 occasions where we have had
 19 to wait for between 1 and 1.5 hours [for the site]."
 20 But a lot of that relates to -- some of that would
 21 relate to information with you in the convoy or is it
 22 your case that -- have you ever known an occasion --
 23 well, ten to 15 occasions where I would have blocked the
 24 gate for a period of one to one and a half hours, me,
 25 because this is my defence statement. Are you aware --

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1 A. I think you've played a part in it, yes.
 2 Q. How? Directly?
 3 A. By standing around the front gate.
 4 Q. Would it be clear to say at 226 that you haven't
 5 specified -- we're back to some vagueness. You can't
 6 really identify -- that was a vague answer; yes?
 7 A. I think that you played a part in it. I'm unaware of
 8 that, yes.
 9 Q. Okay. Right. We're nearly there. I keep saying that,
 10 but we are. 226 -- paragraph 226. Again, there's a bit
 11 of a general feeling you have about being vulnerable and
 12 it's making you feel trapped, the fact that you get
 13 delayed.
 14 A. Yes.
 15 Q. Not terror, but some --
 16 A. That still plays a part, yes.
 17 Q. 227.
 18 "Sadly, the verbal abuse from the protestors has
 19 become just a normal part of my working day."
 20 MR JUSTICE NICKLIN: Where were you reading from then,
 21 Mr Curtin?
 22 MR CURTIN: 227. Can I put it to you another way --
 23 MS BOLTON: Can you read the next sentence?
 24 MR CURTIN: "Sadly, the verbal abuse from the protestors has
 25 become just a normal part of my working day."

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1 MS BOLTON: Keep going.
 2 MR CURTIN: Pardon?
 3 MS BOLTON: Read the whole paragraph.
 4 MR CURTIN: I want to paraphrase it in another way. After
 5 22 months -- is this the situation today? After
 6 22 months, after being called a puppy killer and
 7 a monster, it's become a bit normalised by now. You're
 8 used to people protesting; is that correct?
 9 A. Being called those names has become a normal thing, yes,
 10 but that doesn't change the fact that it still is
 11 upsetting.
 12 Q. Let me use this opportunity to go back to the "puppy
 13 killer" as a verbal abuse. We don't know what your role
 14 is and you're not involved in the bleeding. I spoke to
 15 Susan Pressick yesterday about -- and you'll be aware of
 16 this -- the fact that there's the Envigo beagle and
 17 there's the Harlan beagle, two different breeds; yes?
 18 A. No.
 19 Q. What do you mean by "No"? There's the Envigo beagle and
 20 there's the Harlan beagle. They're completely separate
 21 breeds, no? Unless you as an expert witness --
 22 A. No.
 23 Q. They're not? They're the same?
 24 MR JUSTICE NICKLIN: Mr Curtin, I'm not sure where this
 25 takes us. Why is that relevant?

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1 MR CURTIN: I wasn't expecting his answer.
 2 MR JUSTICE NICKLIN: Don't worry about it, then, because
 3 it's not something I'm going to have to rule on.
 4 MR CURTIN: My information is that they're completely two
 5 genetic strains --
 6 MR JUSTICE NICKLIN: And so what?
 7 MR CURTIN: -- completely -- and that they are ordered by
 8 companies. They either want an Envigo beagle or
 9 a Harlan. You're telling me that's not the case?
 10 A. No.
 11 MR JUSTICE NICKLIN: It doesn't matter. It's not relevant.
 12 MR CURTIN: It was going to become relevant to my question
 13 in that the Harlan beagle is one of the most interbred
 14 dogs that there has ever been on Planet Earth,
 15 completely interbred. As a result of that, they are
 16 full of genetic -- as in more than any other breed, full
 17 of genetic --
 18 MR JUSTICE NICKLIN: That's just not relevant to anything
 19 I have to decide.
 20 MR CURTIN: Let me finish the question, if I may. That
 21 leads to a lot of runt puppies and I was going to ask
 22 the witness, "Have you ever killed a puppy?". It's
 23 simple --
 24 MR JUSTICE NICKLIN: No, no.
 25 MR CURTIN: Okay, and I'm not trying to do anything through

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1 the back doorway. I was asking a question about killing
 2 runts --
 3 MR JUSTICE NICKLIN: No.
 4 MR CURTIN: -- and I'm not going to be able to -- okay,
 5 good.
 6 I know I keep saying I'm done but I do believe we
 7 are.
 8 Ah, 232. You talk about you've suffered -- we'll
 9 look at it.
 10 "When I come to work, I now expect to have to deal
 11 with the protestors and just put up with it."
 12 Sorry, paragraph 232, in the middle.
 13 A. What was the question? Sorry.
 14 Q. I'm confirming -- let's talk about this. Now you just
 15 put up with it?
 16 A. Yes.
 17 Q. You're used to it. Before, 20--odd months ago, you'd
 18 never seen such things; now you put up with it?
 19 A. Yes, but it still doesn't take away the fact that it's
 20 upsetting.
 21 Q. Right. I have one more and I should have taken it up
 22 with Mr Manning but I did not. Part of the injunction
 23 hearing against us is the company, through its
 24 injunction, is trying to prevent the flying of the
 25 drone. What as an employee do you perceive as the -- it

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1 must be -- well, I don't want to put words -- is there
 2 a problem -- have you got a problem with flying the --
 3 with protestors flying drones?
 4 A. Are you able to refer to the bit of the --
 5 Q. No, this is a generic point because it's not in your
 6 witness statement. You don't mention drones.
 7 MS BOLTON: I think he does.
 8 MR CURTIN: Okay. Good. Could you point me to the
 9 paragraph?
 10 MR JUSTICE NICKLIN: Well, it's a legitimate question. Just
 11 tell us what your --
 12 MR CURTIN: As an employee of the company, what's your
 13 problem with the drone?
 14 A. I find that when it follows you around site at the low
 15 levels that it does, it's very intimidating and it can
 16 be a nuisance as well.
 17 Q. Is it the low level?
 18 A. It's the whole thing, as I know.
 19 Q. So if it's 100 metres in the air, it's still a problem
 20 for you?
 21 A. It's still intimidating, yes. It feels like you're
 22 being watched 24/7, that you have no privacy.
 23 Q. But it's not in your home. It's in your controversial
 24 workplace which I could show you a Daily Mirror centre
 25 spread, "Horror of the puppy factory". You're working

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1 in a very, very controversial place, yet you expect
 2 privacy, do you?
 3 A. I feel like I have the right to privacy wherever I am,
 4 yes.
 5 Q. Wherever you are, even if you work in what I just
 6 described?
 7 A. Yes.
 8 Q. Are you aware of -- do your working habits -- have they
 9 ever been stopped, for example, because of the drone?
 10 You find it annoying, you're being watched. Was there
 11 ever an occasion when you couldn't do something that you
 12 were told or set out to do because of the drone?
 13 A. There's been occasions where we wouldn't push the dogs
 14 around in the trolleys because of the drone.
 15 Q. Why is that?
 16 A. Because not only is it a nuisance to us and we find it
 17 intimidating but it also irritates the dogs as well.
 18 Q. Okay.
 19 Your Honour, I must -- tell me how a drone flying in
 20 the air irritates a trolleyload of puppies? Come on.
 21 A. Because it's a foreign object. It's something they're
 22 not used to --
 23 Q. How low are we talking?
 24 A. 7 or 8 foot.
 25 Q. 7 or 8 foot? There's no evidence --

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1 MS BOLTON: It's in his evidence --
 2 MR CURTIN: There is evidence? Where is the evidence of
 3 7/8 foot? There's witness statements. There's no --
 4 MS BOLTON: The low levels are covered in his witness
 5 statement.
 6 MR CURTIN: There's nowhere in your witness statement where
 7 you've said this, where -- 7/8 foot? That could -- if
 8 you made a mistake, that could be possibly dangerous.
 9 I can imagine that would be a -- 7/8 foot, the point --
 10 MR JUSTICE NICKLIN: Stop. If there's a point and you want
 11 to tell me where in the witness statement he deals with
 12 this, get up and tell me where it is.
 13 MS BOLTON: My Lord, I was about to say, the witness deals
 14 with all of the impacts of the drone, including the
 15 height of the drone. He doesn't say 7/8 foot but he
 16 explains the low level of the drones. It's between
 17 paragraphs 215 and 220. It's being said he's not said
 18 anything about this and there's quite a bit in his
 19 witness statement.
 20 MR CURTIN: No, I take that back.
 21 MR JUSTICE NICKLIN: Right. 215.
 22 MR CURTIN: Maybe it's blocked out of mine. I haven't got
 23 it because it's not relevant to me.
 24 MS BOLTON: You should have it.
 25 MR CURTIN: Could you paraphrase for me what he says and

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1 I'll accept what you say? Ah, it's on the screen. 215.
 2 (Pause)
 3 Okay, yes. So at some point in the past I asked you
 4 have you ever not done anything. Now, it looks like
 5 there's a matter of -- you're going(?) to ignore the
 6 drone. Does the drone fly regularly?
 7 A. Yes.
 8 Q. So if every time the drone went up -- if the drone is
 9 up, you can't put the -- that's not the position, is it?
 10 The drone is up often and you go about your business,
 11 knowing -- but having this feeling of invasion of
 12 privacy, that you're being watched.
 13 A. The invasion of privacy and being watched still plays
 14 a part today, yes.
 15 Q. Are you aware -- is it the case that -- so your case is
 16 that -- for example, I made a quick list. We had the
 17 trolleys being used -- it's my case that the trolleys
 18 were used, yes, regularly, 2nd of -- 2 February, 8th --
 19 I just picked out a month at random. This is February.
 20 2 February, 8 February, 13 February, 14 February. You
 21 don't move the puppies around every day, do you -- not
 22 every day? It would be very rare every single day in
 23 a two-week period you're moving trolleys around? It
 24 doesn't seem to go like that, does it?
 25 A. It varies.

1 Q. It varies, but isn't it more the case -- would you say
 2 the average pattern -- I'm trying to average it. I'm
 3 trying to be helpful here. But once every four days
 4 there's a need to move the puppies from this building --
 5 A. Again, it varies week to week.
 6 Q. Are you aware of any decision made not to fly -- "We
 7 cannot fly the -- we cannot use the trolleys anymore and
 8 we must only use the vans", for example, it's that bad?
 9 A. There has been times like that, yes.
 10 Q. When?
 11 A. I can't recall an exact date.
 12 Q. But I don't know, but you regularly -- you're a man that
 13 I've witnessed using trolleys regularly, throughout the
 14 entire period. You never stopped using trolleys that
 15 I know of. Would you accept that?
 16 A. There was a period of time where I stopped using the
 17 trolleys and would use the work van, yes.
 18 Q. Was that your decision?
 19 A. Yes.
 20 Q. Okay.
 21 A. There was also a period of time after my identity was
 22 revealed that I would use the trolleys.
 23 Q. Okay, to such a point -- I don't know, I might get told
 24 off by the judge -- one of your nicknames with us was
 25 "Trolley dolly" -- you used the trolley -- you're the

1 person that uses a trolley a lot. If there's a trolley
 2 around, it's often you that's using it; yes?
 3 A. I'm aware you call me that.
 4 Q. Have you had training -- this is my last question. Have
 5 you had training -- have you had animal welfare
 6 training? Hopefully this doesn't stray too far. This
 7 man works for a company. I want to ask him about --
 8 MR JUSTICE NICKLIN: It's not relevant.
 9 MR CURTIN: Oh. But what if this man has had no training
 10 and no one on site has had any training --
 11 MR JUSTICE NICKLIN: Does that justify you blocking the
 12 carriageway, harassing employees? The answer is "No".
 13 MR CURTIN: It would be an emergency if no one on that site
 14 has had any training and it was a complete absolute
 15 mess.
 16 MR JUSTICE NICKLIN: No, no, it's back to the point which
 17 I keep on repeating, Mr Curtin, which is you don't have
 18 to demonstrate the well-founded nature of your or the
 19 sincerely held nature of your belief underpinning your
 20 protest.
 21 MR CURTIN: One question, and I don't think it will annoy
 22 you -- not that it does annoy you -- sorry to --
 23 MR JUSTICE NICKLIN: It's not annoying me, Mr Curtin. It's
 24 just that you have to keep remembering what the
 25 parameters of this litigation are, and every time you

1 stray off that and you cross the line, it's my
 2 responsibility to remind you again that that's not
 3 relevant.
 4 MR CURTIN: One question. I put it to you that drone
 5 footage from -- we've even got a date -- November 22
 6 last year -- no, November 18 -- do you think this is
 7 impossible, what I'm about to say, that ten puppies were
 8 put into one trolley -- ten puppies into one trolley?
 9 A. Do I think that's possible?
 10 Q. Yes.
 11 A. Yes. It depends on the size of the dog.
 12 MR CURTIN: Okay. That's my last question. Thank you.
 13 MR JUSTICE NICKLIN: Right, I've checked Mr Curtin's
 14 statement and the drone is not included in it.
 15 MS BOLTON: No. I think it's because there's no -- I think
 16 when people have been chopping parts up, there's no
 17 actual reference to Mr Curtin flying a drone. This
 18 witness isn't alleging that they've seen Mr Curtin fly
 19 a drone so it would have been in the persons unknown
 20 only.
 21 MR JUSTICE NICKLIN: Okay.
 22 Right. Ms Jaffray. You're on mute.
 23 MS JAFFRAY: Can you hear me?
 24 MR JUSTICE NICKLIN: Yes.
 25 Cross-examination by MS JAFFRAY

1 MS JAFFRAY: So, Mr Hardy, when you worked at Harlan and it
 2 was taken over by MBR, you've already said yourself some
 3 of the dogs were euthanised there. Were there any
 4 protests outside after that happened?
 5 A. Sorry, I can't really ---
 6 MR JUSTICE NICKLIN: Do you recall, in the period when
 7 Harlan --- the business was transferred to MBR, were
 8 there protests outside?
 9 A. Harlan transferred to Envigo.
 10 MR JUSTICE NICKLIN: Envigo.
 11 A. Then no.
 12 MR JUSTICE NICKLIN: No.
 13 MS JAFFRAY: So was it not public knowledge that some of the
 14 dogs were euthanised at that point?
 15 MR JUSTICE NICKLIN: Ms Jaffray, you're going to be subject
 16 to the same rules and restrictions as Mr Curtin, which
 17 is that these are not relevant questions.
 18 MS JAFFRAY: Okay. Were you surprised when the protests
 19 started, given how controversial MBR is?
 20 A. Yes.
 21 Q. So you weren't expecting them at all?
 22 A. No.
 23 Q. No, okay. When you said that you were receiving abuse
 24 at the protests when you arrived --- you've put abuse and
 25 people were threatening you. What were they exactly

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1 saying?
 2 A. Is that --- what part is that?
 3 Q. I'm on paragraph 8. --- sorry, paragraph 6.
 4 A. Yes, that's correct.
 5 Q. Yes? You've mentioned the protestors were threatening
 6 you. What were they saying to threaten you with?
 7 A. I can't recall exact words, but it would be along the
 8 lines of "We're going to shut you down". That's all
 9 I can really remember, to be honest.
 10 MR JUSTICE NICKLIN: Okay.
 11 MS JAFFRAY: So not personal threats then?
 12 A. Not that I can recall.
 13 Q. So I was there every morning for the first five months
 14 and in them five months none of the staff were ever
 15 prevented from going in. There was one occasion where
 16 staff arrived two hours late and on that occasion
 17 protestors were so concerned for the dogs that we were
 18 phoning the RSPCA for about an hour, whereas you've said
 19 in paragraph 10 that it happened on a few occasions.
 20 A. Yes, as later on in my statement, where it states ten to
 21 15 times we were delayed.
 22 Q. So I'm guessing that must have been after the first five
 23 months then?
 24 A. I can't recall an exact time period, but it was before
 25 the injunction.

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1 Q. So before the injunction --- forgive me if I'm wrong ---
 2 the injunction first came into place about November---time
 3 I think.
 4 MR JUSTICE NICKLIN: Well, there was an interim injunction
 5 from August.
 6 MS JAFFRAY: August?
 7 MR JUSTICE NICKLIN: There was an initial injunction
 8 in August but the exclusion zone was introduced
 9 in November.
 10 MS JAFFRAY: Of 2021?
 11 MR JUSTICE NICKLIN: Yes.
 12 MS JAFFRAY: Yes, okay. So I was there daily up until the
 13 end of October and I can categorically say that there
 14 was one occasion where the staff came in two hours late
 15 and that was not due to protestors. That was for
 16 reasons unknown, but we were never told why, but we were
 17 concerned that the dogs weren't being seen to.
 18 MR JUSTICE NICKLIN: Right, Ms Jaffray, the purpose of
 19 cross-examination is for you to ask questions of the
 20 witness rather than for you to tell me what you say
 21 about events; all right?
 22 MS JAFFRAY: Yes, fair enough.
 23 Okay. So I have actually submitted five photos.
 24 Are we able to look at them?
 25 A. I have, yes.

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1 MS JAFFRAY: Sorry, I was talking to the court. There's
 2 five photos.
 3 MR JUSTICE NICKLIN: Have we got them? I don't have
 4 facilities to print out photographs. The resources of
 5 the court are, to a degree, limited. I don't have the
 6 facility to print out photographs. I don't know whether
 7 we can put them on the screen. Are we able to do that?
 8 MS JAFFRAY: Yes, that's what I thought.
 9 MS BOLTON: My Lord, Opus doesn't have them yet because they
 10 only came at lunchtime.
 11 MR JUSTICE NICKLIN: Okay.
 12 MS JAFFRAY: Okay, I did submit them last week. That's
 13 a shame actually.
 14 MR JUSTICE NICKLIN: Well, no, no, we'll try and get them,
 15 but tell us what they are.
 16 MS JAFFRAY: Okay, so there's five photos. Three of them
 17 will be Mr Hardy, in his car, laughing at protestors.
 18 One of them --- I'm not sure if it's Mr Hardy's car or
 19 not, but you can see the passenger laughing and waving
 20 at protestors. The final one is a driver sticking their
 21 finger up at protestors.
 22 MR JUSTICE NICKLIN: Right. Well, where are those?
 23 MS BOLTON: What we do know is a number of those photographs
 24 are not Mr Hardy so they need to be taken through and
 25 Ms Jaffray needs to suggest which ones she thinks are

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1 Mr Hardy.
 2 MR JUSTICE NICKLIN: Right. Let's get them on the screen
 3 first, then, please.
 4 Can you see what we're seeing, Ms Jaffray?
 5 MS JAFFRAY: I can't, but I only have five. The link didn't
 6 work, so if someone could just really briefly describe
 7 what they are. I've got them here on my phone.
 8 MR JUSTICE NICKLIN: Okay, there's IMG3994.
 9 MS JAFFRAY: I don't have reference numbers either.
 10 So can you see one where there's a face, very close
 11 up actually, staring out from the driver's side?
 12 MR JUSTICE NICKLIN: We've got three pictures of drivers.
 13 One person is wearing -- two people are wearing
 14 sunglasses, one person is not wearing sunglasses.
 15 MS JAFFRAY: Okay. So the person with the sunglasses, is
 16 that Mr Hardy --
 17 MR JUSTICE NICKLIN: There are two people wearing
 18 sunglasses. One has something red in front of the
 19 steering wheel. The other doesn't.
 20 MS JAFFRAY: Yes.
 21 MR JUSTICE NICKLIN: Which one?
 22 MS JAFFRAY: Are they Mr Hardy?
 23 MR JUSTICE NICKLIN: Which one?
 24 MS JAFFRAY: Either.
 25 MR JUSTICE NICKLIN: No, no -- okay, so both of those.

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1 Mr Hardy, is either the picture -- there's a man in
 2 sunglasses in two of the photographs. Are either of
 3 those pictures you?
 4 A. Yes.
 5 MR JUSTICE NICKLIN: Right. Are they both you?
 6 A. Yes.
 7 MR JUSTICE NICKLIN: Right.
 8 MS JAFFRAY: Okay. Then the other one --
 9 MR JUSTICE NICKLIN: Just a minute. What's the question
 10 that you want Mr Hardy to answer about those
 11 photographs?
 12 MS JAFFRAY: Okay, I wanted to ask, if you feel so
 13 intimidated by the protestors, why he would be looking
 14 out and laughing at them?
 15 A. Quite often there would be a guard by the gate or before
 16 we would leave out and I would stop to have a chat with
 17 him and quite often we'd have a laugh and a joke. That
 18 would be the reason why.
 19 MR JUSTICE NICKLIN: Okay. Now we've eliminated that. Is
 20 the person -- the remaining picture of a driver, is that
 21 you?
 22 A. The one in the top left?
 23 MR JUSTICE NICKLIN: Yes.
 24 A. That's me, yes. That's the same as well.
 25 MR JUSTICE NICKLIN: Okay. So all three of those

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1 photographs of the drivers of the cars are Mr Hardy.
 2 Do you want to ask him any further question about the
 3 one where he's not wearing sunglasses?
 4 MS JAFFRAY: Okay, so you say that that might have been
 5 because you'd just had a joke with the guards, the
 6 security guards?
 7 A. Some of the time, yes.
 8 Q. Okay, there's one picture and I wasn't sure if it's of
 9 Mr Hardy's car or not. It's a white car and you can see
 10 the back passenger.
 11 A. The white and the silver car is not me.
 12 Q. That's not you?
 13 A. No.
 14 Q. Okay. So you can see there's two members of staff in
 15 there, one waving, one sticking their finger up. What
 16 was the general feel amongst members of staff towards
 17 each other? Did you laugh with each other about the
 18 protestors? That kind of gives the impression that that
 19 did happen.
 20 A. I'm not in any of those cars so I'm unaware.
 21 Q. And conversations between yourself and other members of
 22 staff, when you talked about the protestors?
 23 A. Are you asking about the conversations?
 24 Q. Were they conversations of how intimidating the
 25 protestors were or were they laughing about protestors?

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1 A. We would talk about how intimidating they were, how we
 2 would feel towards them. We would never laugh and joke
 3 about them, no.
 4 Q. Okay. And under oath you would say that?
 5 A. Yes.
 6 Q. Okay. So given that -- there's no reference with this
 7 one to a paragraph. It's just in general. Given that
 8 you say you feel quite intimidated by the protestors,
 9 there has been occasions where you push the trolleys
 10 full of dogs right next to the boundary fence where
 11 there's protestors the other side of that. Why would
 12 that be?
 13 A. Because that's the only access road up and down the
 14 site.
 15 Q. But you don't have to push them that near to the
 16 boundary fence is what I'm saying.
 17 A. Again, that's the only access road down -- up and down
 18 the site.
 19 Q. Yes, I do understand that, but pushing them that closely
 20 to the fence is going to be quite provocative to
 21 protestors, don't you think?
 22 A. I don't recall pushing it -- I mean, the access road is
 23 not very wide itself anyway, so ...
 24 Q. Right. I don't have video evidence of this so it might
 25 not be permitted. I'm just going to ask Mr Hardy if he

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1 recalls one time in summer 2021, when I was standing
 2 outside by the boundary fence, when you started shouting
 3 over and saying that myself and another protestor were
 4 paedophiles and asked if we wanted photos.
 5 A. No, that was never me.
 6 Q. Okay. So this would have been the beginning of 2022,
 7 myself and a few others were doing a smaller demo in the
 8 week down the side — early morning, down the side of
 9 MBR, near the buildings. I was on a loudspeaker and
 10 I could hear somebody inside the building banging a mop
 11 against the walls of the dog enclosures. On the loud
 12 speaker, I said, "Please show them some care, show them
 13 some love and stop banging that mop against the walls",
 14 so the mop started banging a lot louder, which I'm going
 15 to assume was intentionally to infuriate the protestors.
 16 Would that have been yourself?
 17 A. No.
 18 Q. Are you aware of anyone — are you aware of any members
 19 of staff trying to purposely antagonise any of the
 20 protestors?
 21 A. I am unaware of that.
 22 Q. Ever?
 23 A. From what I can recall, yes.
 24 Q. Okay. So we'll go to paragraph 69. So there's
 25 reference to me hitting the bonnet of your car.

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1 A. Yes.
 2 Q. Yes? Okay, so unfortunately I haven't got the video
 3 evidence that went through to the police. There were
 4 protestors around your car and you shunted your car
 5 towards me so I put my hands down as an immediate
 6 reaction to defend myself. Do you remember that
 7 happening?
 8 A. I remember that happening. I did not shunt my car
 9 towards you, though.
 10 Q. I mean, it clearly shows on the video, but okay. So why
 11 didn't you make a statement to that effect?
 12 MR JUSTICE NICKLIN: To whom?
 13 MS JAFFRAY: To the police, because the police dropped the
 14 charges because there was no evidence and the member of
 15 staff didn't want to take it forward or make
 16 a statement.
 17 A. I don't recall ever speaking to the police about the
 18 incident.
 19 Q. The police must have asked you if you wanted to make
 20 a statement because they told me that no statement was
 21 given.
 22 MR JUSTICE NICKLIN: Well, Mr Hardy can only answer from his
 23 own information and knowledge, so if the police told you
 24 something differently, you might have to explore that
 25 through other methods, but Mr Hardy won't know the

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1 answer to that question.
 2 MS JAFFRAY: Okay. I'm going through your statement where
 3 you've got protestors' names. So I think you're on
 4 different page numbers actually. If we go to
 5 paragraph 121 — okay? — so on there — and I've
 6 noticed this through lots of people's statements, not
 7 just your own — is there any reason why people are
 8 constantly grouping myself together with Mr Broughton on
 9 this statement? It's a running theme all the way
 10 through.
 11 A. No, there's no particular reason.
 12 Q. No? So it's not to make us look like we're working
 13 together as such at the protests?
 14 A. No.
 15 Q. Paragraph 165 —
 16 A. Okay.
 17 Q. — there's allegations that windows have been smashed.
 18 Correct me if I'm wrong — I don't know — but were
 19 windows actually smashed by protestors?
 20 A. Not myself, but some of my colleagues' car windows were,
 21 yes.
 22 Q. They were smashed, okay.
 23 Okay, paragraph 234 —
 24 A. Yes.
 25 Q. — so there you've said that posters have been put up

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1 around your home.
 2 A. That's correct.
 3 Q. What would make you think that that was the protestors
 4 and not local people? Mr Manning has already referred
 5 to a neighbour assaulting him, so this could quite
 6 realistically have been locals, neighbours, et cetera,
 7 and not protestors.
 8 A. I believe that it would be somebody who would either be
 9 following Camp Beagle — involved in some way due to the
 10 pictures that they had on them.
 11 Q. But people from your village or town or whatever would
 12 have seen photos, so they could have been responsible
 13 and not the protestors as such.
 14 A. They could have been, but I'm unaware of that.
 15 Q. Are you also unaware that it was protestors? There's
 16 been no evidence of who it was?
 17 A. I believe that it's a protestor or somebody to do with
 18 your campaign, otherwise they would never have been put
 19 up.
 20 Q. Okay. So that's a belief, not a confirmation.
 21 Just one moment. Okay, so you've made reference —
 22 sorry, it's going backwards — on point 16 —
 23 A. Okay.
 24 Q. — that from the start of the protest you took measures
 25 to cover your face and to conceal your identity. From

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1 the start of the protests was that?
 2 A. Yes, I believe so.
 3 Q. And that was until about the beginning of March 2022?
 4 A. I can't remember an exact date, but there was a period
 5 of time where I covered up my identity, yes.
 6 Q. So almost for the first year --- camp started around the
 7 end of June 2021, so you're saying that you covered your
 8 face for that period because you didn't want to be
 9 identified?
 10 A. Yes.
 11 Q. You're under oath.
 12 A. Can you repeat the question again?
 13 Q. So Camp Beagle started at the end of June 2021 and you
 14 said that you started wearing a face covering then and
 15 you stopped wearing it around the beginning of
 16 March 2022. Would you say that is an honest
 17 recollection that you did that?
 18 A. Roughly.
 19 Q. So there would be no photos to show otherwise, that you
 20 didn't have your face revealed?
 21 A. I am unaware of that.
 22 Q. Just one second. I'm sorry. Just one moment.
 23 Can you tell me how the protestors made you feel in
 24 general when you've been going in and has that lessened
 25 over time, any feeling of fear or terror or

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1 intimidation? Has that feeling decreased over time?
 2 A. As I explained to Mr Curtin earlier, at the beginning
 3 the terror and the experience in that was overwhelming,
 4 having not experienced anything like that before. The
 5 behaviours of the protestors and the way that they were
 6 behaving at the front of site, unknowing what they would
 7 do, the terror of that aspect was quite high. Once the
 8 injunction was in place, the behaviour of the protestors
 9 changed, with the exclusion zone. So, yes, I would say
 10 that over time the level of terror has lessened but it
 11 is still there.
 12 Q. It still remains now?
 13 A. Yes, because of the unpredict ... ---
 14 MR JUSTICE NICKLIN: Unpredictability?
 15 A. Yes, thank you.
 16 MS JAFFRAY: Okay. It's surprising that there's quite a few
 17 members of staff that would go past laughing and making
 18 obscene gestures if you guys feel that intimidated
 19 still. Okay.
 20 Last question. So at the beginning obviously there
 21 was a lot of police presence to facilitate staff
 22 arriving and leaving. The police were helping staff
 23 leave, they were signalling them when to pull out, when
 24 to turn into the highway, and the police were keeping
 25 protestors back. Did you still feel quite terrified

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1 then?
 2 A. Say that again, sorry.
 3 Q. At the very beginning of the protest, there was a lot of
 4 police presence ---
 5 A. Yes.
 6 Q. --- so the police were facilitating staff arriving and
 7 leaving. The police were telling protestors how they
 8 could and how they couldn't behave. So are you saying
 9 that still at that point you felt quite threatened?
 10 A. Yes.
 11 Q. Even with the police presence?
 12 A. Even with the police presence, yes.
 13 Q. Okay. And that fear has lessened enough that you're
 14 happy to go to work without any feeling of intimidation
 15 or terror?
 16 A. As I said ---
 17 Q. Is this ---
 18 A. As I said previously, the fear and the terror is still
 19 there.
 20 Q. Would you say it's more of an uncomfortable feeling
 21 rather than a terror?
 22 A. I would say that the shouting and the verbal abuse is
 23 uncomfortable, yes, but, as I said a minute ago, the
 24 word that I can't say ---
 25 MR JUSTICE NICKLIN: "Unpredictability"?

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1 A. --- the unpredictability of what can happen is why we ---
 2 why I still feel the terror.
 3 MS JAFFRAY: Are you aware of the last time that the police
 4 might have been called to facilitate staff leaving or
 5 arriving?
 6 A. I can't recall that, no.
 7 Q. No. So do you think maybe it's been quite a while?
 8 A. It's been quite a while, yes.
 9 Q. It has? So things have considerably calmed down?
 10 A. Yes, but the thought of that is still there.
 11 Q. So at the moment, as you know, the injunction keeps
 12 people --- keeps the protestors back quite some --- well,
 13 it keeps them away from the road.
 14 A. Yes.
 15 Q. Yes? They hold placards, they might shout, but are you
 16 seriously still feeling fear even though there is like
 17 a --- there's a barrier now between the protestors and
 18 the road?
 19 A. Yes, because there's been a few occasions that, once we
 20 are outside that exclusion zone, there's been some
 21 incidents there.
 22 Q. Has that been when the police have been there?
 23 A. Not when the police have been there, no.
 24 MS JAFFRAY: No, okay. I'm unaware of them. Okay, I think
 25 that's all of my questions. Thank you.

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1 MR CURTIN: My Lord, I have one question. I'm looking at
 2 the clock. I'm hoping for a very simple -- I'm asking
 3 if it's important to my defence --
 4 MR JUSTICE NICKLIN: Go on.
 5 MR CURTIN: -- and I'm expecting a simple answer.
 6 Further cross-examination by MR CURTIN
 7 MR CURTIN: In relation to the -- I don't need to paragraph
 8 it -- the funeral cards to your house, which is not ...
 9 and other instances relating to you being identified ,
 10 do you hold me -- it's in my bundle -- do you hold me
 11 responsible for the funeral cards incident?
 12 A. I am unaware. No, I don't.
 13 MR CURTIN: Thank you.
 14 MR JUSTICE NICKLIN: Right.
 15 Ms Bolton?
 16 MS BOLTON: My Lord, I'll be as quick as I can. I have
 17 a very small amount of re-examination.
 18 Re-examination by MS BOLTON
 19 MS BOLTON: Mr Hardy, first of all, could I ask, could you
 20 please go to paragraph 69 in your witness statement?
 21 A. Yes.
 22 Q. Can you just read the entirety of that paragraph to
 23 yourself, please?
 24 A. Okay.
 25 Q. You were asked by Ms Jaffray whether you reported to the

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1 police her hitting the car. I think you said you don't
 2 recall reporting it to the police. Do you stand by that
 3 answer?
 4 A. Yes.
 5 Q. Now, Ms Jaffray asked you or she challenged whether
 6 you'd been obstructed or delayed in getting into the
 7 Wyton site. She said that she had been there for the
 8 first five months of the protest and that she didn't
 9 believe that was the case. You said that you believed
 10 that you were delayed. Can I ask you to look at
 11 paragraph 36 of your witness statement, please?
 12 A. Okay.
 13 Q. Can you just read that paragraph to yourself, please?
 14 (Pause)
 15 A. Okay.
 16 Q. Is that one of the incidents where you were delayed
 17 entering the Wyton site?
 18 A. Yes.
 19 Q. Can I ask you to go to paragraph 73, please?
 20 A. Okay.
 21 Q. Could you read that paragraph, please? (Pause)
 22 A. Yes.
 23 Q. Is that one of the incidents where you were delayed
 24 entering the Wyton site?
 25 A. It is.

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1 Q. And paragraph 78, please, if you could read that to
 2 yourself, please. (Pause)
 3 Is that one of the incidents where you were delayed
 4 entering the Wyton site?
 5 A. It is, yes.
 6 Q. Paragraph 87, please, if you could read that to
 7 yourself, please. (Pause)
 8 Is that one of the incidents where you were delayed
 9 entering the Wyton site?
 10 A. It is, yes.
 11 Q. Paragraph 102 and 103, please. (Pause)
 12 Is that one of the incidents where you were delayed
 13 entering the Wyton site?
 14 A. Yes.
 15 Q. Finally, paragraph 138, please, again if you could read
 16 that to yourself. (Pause)
 17 A. Yes.
 18 Q. Is that one of the incidents where you were delayed
 19 entering the Wyton site?
 20 A. Yes.
 21 MS BOLTON: Thank you very much, Mr Hardy.
 22 My Lord, I have no further re-examination.
 23 MR JUSTICE NICKLIN: Mr Hardy, thank you very much for
 24 coming to give your evidence. You're finished now.
 25 A. Thank you.

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1 MR JUSTICE NICKLIN: All right? Thank you.
 2 (The witness withdrew)
 3 What's the position of Ms Jaffray at the moment?
 4 I'm slightly concerned that there remain issues about
 5 Ms Jaffray not having complied with the orders the court
 6 has made and continuing to participate in the trial in
 7 circumstances where it's undesirable -- I'll put it no
 8 higher than that -- that there's a sort of continued
 9 participation in the trial but not compliance with the
 10 orders.
 11 MS BOLTON: Yes.
 12 Ms Jaffray, I've been reasonably tolerant and
 13 allowed you to participate without, as it were, focusing
 14 in on the fact that you've not complied with the most
 15 basic requirements for litigants who are participating
 16 in a trial. Now, even allowing for your status as
 17 a litigant in person, there's a limit because fairness
 18 requires that you comply with the same rules that
 19 everybody else is under when they participate in a trial
 20 like this. You are required as a very basic minimum to
 21 confirm your defence and to set out any matters upon
 22 which you want to rely in your evidence. I'm not going
 23 to permit you to continue to participate in the trial if
 24 you've not complied with those requirements; all right?
 25 Now, earlier in the week I gave you further time to

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1 think about — because you told me that you were
 2 thinking about accepting an offer that the claimants had
 3 made. It's entirely up to you whether you accept that
 4 offer, but next week, if you've not complied with the
 5 requirements to confirm your defence with a statement of
 6 truth and provided any further information, like
 7 Mr Curtin has done, in a witness statement, setting out
 8 the matters upon which he wants to rely — now, I would
 9 like you, please, over the weekend to address those
 10 matters so that, when we get to next week, at
 11 a convenient time, if you're carrying on being
 12 a defendant in the proceedings, I need you to have
 13 regularised that position; all right?
 14 MS JAFFRAY: Yes. That's fine.
 15 MR JUSTICE NICKLIN: Okay.
 16 MS JAFFRAY: I have let the solicitors know that I will give
 17 them an answer by the end of Sunday if I'm going to
 18 continue or not.
 19 MR JUSTICE NICKLIN: Okay. I think that's everything for
 20 this week, isn't it?
 21 MS BOLTON: My Lord.
 22 MEMBER OF THE PRESS: Can I just — sorry to disturb you at
 23 the end of the day. I just wanted to put your mind to
 24 something that's causing me a bit of concern.
 25 Mr James Hardy, I can name Mr Hardy —

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1 MR JUSTICE NICKLIN: Yes, you can.
 2 MEMBER OF THE PRESS: — but there are other witnesses who
 3 are anonymous?
 4 MR JUSTICE NICKLIN: Yes, there's an order in place.
 5 NEW SPEAKER:
 6 MEMBER OF THE PRESS: Okay. Normally, when we name
 7 people — when we identify people, we normally — it's
 8 not just their name. So, for example, if I'm
 9 watching — if I'm speaking to someone watching the
 10 coronation, I would ask them their name, age and address
 11 and occupation, the identity. My concern with Mr Hardy
 12 is if I only give his name — it's a very common name.
 13 I did a quick 192 search, something on Google. I'm just
 14 concerned that if there is a risk that by publishing his
 15 address there might be some incident, someone might get
 16 the wrong Mr Hardy. What I would ideally like to do is
 17 to be able to give more details of age and his address
 18 to identify the right Mr Hardy. I, for example, have
 19 a friend called James Hardy who works in Cambridge and
 20 lives in Cambridge.
 21 MR JUSTICE NICKLIN: If you describe him as Mr Hardy who was
 22 employed by MBR Acres in Cambridgeshire, that will be
 23 sufficient to identify him, won't it?
 24 MEMBER OF THE PRESS: I just want to make sure — I think it
 25 probably would. I just want to make sure you've put

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1 your mind to the problem and you're happy with that.
 2 MR JUSTICE NICKLIN: Well, my main concern has been that —
 3 the greater risk, which in the balancing process I have
 4 to have regard to, is that the individual employees, if
 5 their addresses are given, are at risk of being targeted
 6 by people.
 7 MEMBER OF THE PRESS: Of course.
 8 MR JUSTICE NICKLIN: So there's a balance to be struck.
 9 I think if you describe him by his name and his
 10 employment, that should narrow down the candidates.
 11 MEMBER OF THE PRESS: I just wanted you to put your mind to
 12 it. It was something I had concern about and I didn't
 13 want to be the cause of someone else having a problem.
 14 MR JUSTICE NICKLIN: Well, now that you've had yourself
 15 alerted to that, those representing the claimants and
 16 thereby having direct regard to Mr Hardy's own
 17 interests, if they want to consider that position and
 18 provide you with any further information that they're
 19 happy for you to provide, then I'm sure they'll let you
 20 know.
 21 MEMBER OF THE PRESS: Okay, thank you very much. I'm sorry
 22 to —
 23 MR JUSTICE NICKLIN: That's all right. Right, Tuesday at
 24 10.30.
 25 MS BOLTON: My Lord, thank you to the court staff.

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1 (4.53 pm)
 2 (The hearing adjourned until
 3 Tuesday, 2 May 2023 at 10.30 am)

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