Party: Claimants

Name: Andrew James Todd

Number: Fourth

Date: 28 January 2025

CLAIM NO: KB-2025-000136

IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

BETWEEN

- (1) WM MORRISON SUPERMARKETS LIMITED
- (2) SAFEWAY STORES LIMITED
- (3) WM MORRISON PRODUCE LIMITED

Claimants

- v -

- (1) PERSONS UNKNOWN WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1 TO THE CLAIM FORM WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS
- (2) PERSONS UNKNOWN WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWN ON THE PLANS AT SCHEDULE 2 TO THE CLAIM FORM, WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS

	<u>Defendants</u>
EXHIBIT AJT5	-

CLAIM NO: KB-2025-000136

IN THE HIGH COURT OF JUSTICE KINGS BENCH DIVISION

BEFORE: THE HONOURABLE MRS JUSTICE COLLINS RICE

DATED: 16 JANUARY 2025

BETWEEN:-

(1) WM MORRISON SUPERMARKETS LIMITED 7 Jan 2025 (2) SAFEWAY STORES LIMITED

(3) WM MORRISON PRODUCE LIMITED

& BENCH CIAINIAN

- V -

KB-2025-000136

- (1) PERSONS UNKNOWN WHO ENTER AND REMAIN UPON ANY OF THE SITES WHICH ARE DEFINED IN SCHEDULE 1 TO THE CLAIM FORM WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM)
 - (2) PERSONS UNKNOWN WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID SITES, WHICH ARE SHOWNS ON THE PLANS AT SCHEDULE 2 TO THE CLAIM FORM, WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM)

	<u>Defendants</u>
ORDER	_
PENAL NOTICE	_

IF YOU, THE DEFENDANTS, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR ANY OF THEM TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN

CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).

UPON the Claimants' claim by the Claim Form dated 15 January 2025

AND UPON the Claimants' application for an injunction dated 15 January 2025 ("the **Application**")

AND UPON READING the Application and the witness statements filed in support of it ("the Witness Statements")

AND UPON hearing Leading and Junior Counsel for the Claimants and no one attending for the Defendants

AND UPON the Claimants having given informal short notice of the hearing and having provided copies of all of the documents filed with the Court, by emailing info@farmerstoaction.org and by uploading the said documents to www.morrisons-corporate.com/injunction

AND UPON the Court being satisfied, on the evidence and submissions before it as to circumstances and investigations made by or available to the Claimants, that the Claimants have thereby taken all practicable steps to notify the Defendants of the Application prior to the hearing pursuant to section 12(1) and (2) of the Human Rights Act 1998

AND UPON the Claimants undertaking to the Court hereafter to use its best endeavours to take such further practicable steps to notify the Defendants pursuant to the undertaking set out in Schedule 3

AND UPON any persons affected by this Order having the right to apply to vary to set aside the Order, pursuant to paragraph 15 below

AND UPON the Court having carefully considered the grounds for the Application, the evidence and any arguable defences that might be raised by the Defendants and being satisfied that the Claimants have established, on the evidence filed by the Claimants, that: (1) the Claimants have a good cause of action in relation to each of the Sites and the Access Roads, in respect of which they are likely to succeed at trial pursuant to section 12(3) of the Human Rights Act 1998; (2) the Claimants have complied with the duty of full and frank disclosure; (3) there is sufficient evidence of a real and imminent risk of tortious activity and real harm; (4) there is no realistic defence to the claim; (5) there is a compelling justification for the injunctions sought; and (6) damages would not be an adequate remedy

AND UPON the Court being satisfied that the relevant procedural requirements for the grant of injunctions against "Persons Unknown" have been established by the Claimants on the evidence and that the terms of the Order are clear and appropriate and, in the circumstances, that it is just and convenient to grant the injunctions sought

AND UPON the Claimants confirming that this Order is not intended to prohibit any lawful protest outside the Sites in so far as any such protest does not obstruct any of the pedestrian and vehicular entrances or exits to the Sites

AND UPON the Claimants giving and the Court accepting the undertakings set out in Schedule 3 to this Order

IT IS ORDERED THAT:

DEFINITIONS

- 1. "**The Sites**" means the land defined in Schedule 1 to this Order, the extent of which is shown for identification purposes coloured blue on each of the relevant plans appended to this Order in Schedule 2 ("**the Plans**").
- 2. "The Access Roads" means the roads which provide direct access to each of the relevant Sites, the extent of which is shown for identification purposes in pink and/or orange on the Plans.
- 3. "Warning Notices" means notices in the form as set out in Schedule 5 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may

be requested and identifying the website address <u>www.morrisons-</u>corporate.com/injunction at which copies of this Order may be viewed and downloaded).

PERMISSION TO AMEND

4. The Claimants have permission to amend the claim form in order to amend the description of the Defendants and in relation to the absence of an access road to one of the sites.

INJUNCTION

- 5. This Order shall last until the return date, to be listed on 20 January 2025 at 2pm and shall operate with immediate effect until varied, discharged or extended by further order. At the hearing on 20 January 2025, the Court shall consider whether the Order should continue and, if appropriate, give case management directions for the progression of the claim. The Defendants and any person affected by the Order is entitled to attend the return date hearing and make representations as to the matters before the court on that date.
- 6. The Defendants and each of them <u>must not</u> do any of the acts listed in paragraph 7 of this Order.
- 7. The acts referred to in paragraph 6 of this Order are:
 - a. entering, occupying or remaining upon any part of the Sites without the consent of the Claimants in connection with agricultural protests;
 - b. creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the Access Roads in connection with agricultural protests.

SERVICE

8. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), service of the amended Claim Form, the Application, and Witness Statements (with the names of the witnesses and

addresses removed) with their exhibits ("the Claim Documents") shall be validly effected by:

- a. Uploading copies of the Claim Documents to the following website: www.morrisons-corporate.com/injunction
- b. Sending an email to the email addresses listed in Schedule 4 to this Order stating that a claim has been brought and an application made, and that the Claim Documents can be found at the website referred to above.
- c. Affixing the relevant Warning Notice at those locations marked with an "X" on the Plans setting out where the Claim Documents can be found and obtained in hard copy.
- 9. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), service of the Order shall be validly effected on the Defendants by:
 - a. Producing that a copy of the Order is uploaded to the following website: www.morrisons-corporate.com/injunction
 - b. Sending an email to the email addresses listed in Schedule 4 to this Order attaching a copy of this Order.
 - c. Affixing a copy of the Order and the Plan applicable to the relevant Site in A4 size in a clear plastic envelope at those locations marked with an "X" on the Plans.
- 10. The taking of such steps set out at paragraph 8 and 9 shall be good and sufficient service of this Order and of the Claim Documents upon the Defendants and each of them.
- 11. Pursuant to CPR 6.15(4)(b) and 6.27, the deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 8. The step described at paragraph 8(c) will be completed when those documents are first affixed regardless of whether they are subsequently removed.
- 12. Pursuant to CPR 6.15(4)(b) and 6.27, the deemed date of service of this Order shall be the date shown on the relevant certificate of service on completion of the steps described

at paragraph 9. The step described at paragraphs 9(c) will be completed when those documents are first affixed regardless of whether they are subsequently removed.

13. The Court will provide sealed copies of this Order to the Claimants' solicitors for service (whose details are set out below).

FURTHER DIRECTIONS

- 14. Service on the Defendants of any further applications or documents in the proceedings by the Claimants shall be validly effected by carrying out each of the steps in paragraphs 8(a) and 8(b). Pursuant to CPR 6.15(4)(b) and 6.27, the deemed date of service of future documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 8(a) and (b).
- 15. Any person affected by this Order may apply to the Court at any time to vary or discharge it or so much of it as affects that person. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Claimants' solicitors in advance of the hearing.
- 16. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
- 17. No acknowledgment of service, admission or defence is required by any party until further so ordered.
- 18. Costs are reserved.

COMMUNICATIONS WITH THE CLAIMANTS

- 19. The Claimants' solicitors and their contact details are:
 - (1) Andrew Todd Eversheds Sutherland (International) LLP andrewtodd@eversheds-sutherland.com
 - (2) Alex Wright

Eversheds Sutherland (International) LLP

 $\underline{alexwright@eversheds\text{-}sutherland.com}$

SCHEDULE 1 - THE SITES

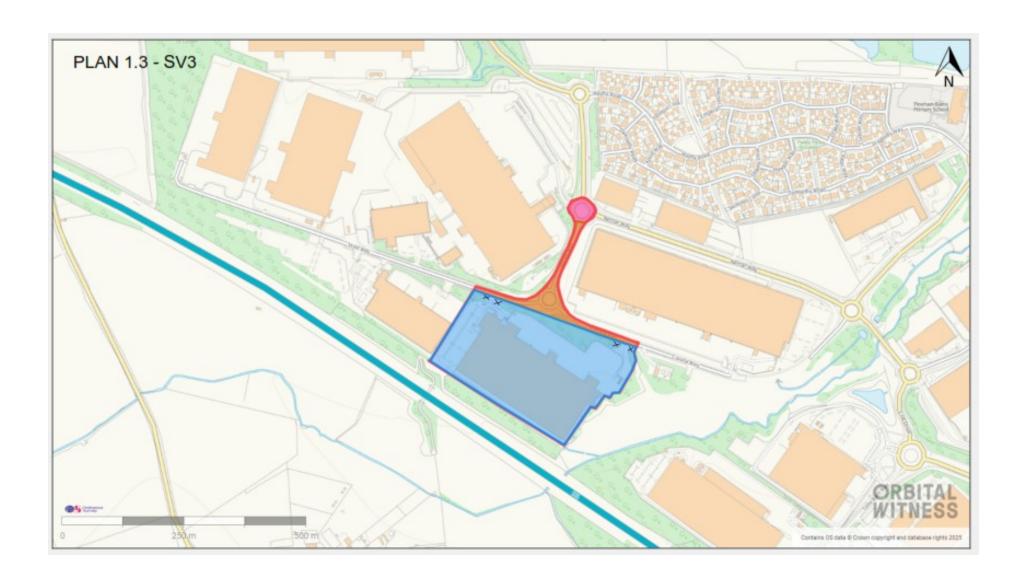
THE SITES BEING:

- (1) THE FIRST CLAIMANT'S NORTHAMPTON VALLEY RETAIL DISTRIBUTION CENTRE AT (A) COB DRIVE, SWAN VALLEY, NORTHAMPTON NN4 9BB; (B) DC2, SWAN VALLEY, NORTHAMPTON NN4 9BD; AND (C) (SV3), UPTON, NORTHAMPTON, THE EXTENT OF WHICH IS SHOWN FOR IDENTIFICATION PURPOSES COLOURED BLUE ON PLAN 1.1., 1.2, AND 1.3, APPENDED TO THIS ORDER IN SCHEDULE 2
- (2) THE SECOND CLAIMANT'S STOCKTON DICKENS RETAIL DISTRIBUTION CENTRE MALLEABLE WAY, STOCKTON-ON-TEES, TS18 2QZ, THE EXTENT OF WHICH IS SHOWN FOR IDENTIFICATION PURPOSES COLOURED BLUE ON PLAN 2 APPENDED TO THIS ORDER IN SCHEDULE 2
- (3) THE FIRST CLAIMANT'S SITTINGBOURNE RETAIL DISTRIBUTION CENTRE AT G PARK, SITTINGBOURNE ME10 2FD, THE EXTENT OF WHICH IS SHOWN FOR IDENTIFICATION PURPOSES COLOURED BLUE ON PLAN 3 APPENDED TO THIS ORDER IN SCHEDULE 2
- (4) THE FIRST AND THIRD CLAIMANTS' GADBROOK RETAIL DISTRIBUTION CENTRE AT KING ST, RUDHEATH, NORTHWICH CW9 7WA, THE EXTENT OF WHICH IS SHOWN FOR IDENTIFICATION PURPOSES COLOURED BLUE ON PLAN 4 APPENDED TO THIS ORDER IN SCHEDULE 2
- (5) THE FIRST CLAIMANT'S LATIMER PARK KETTERING RETAIL DISTRIBUTION CENTRE AT ALTENDIEZ WAY, BURTON LATIMER, KETTERING NN15 5YT, THE EXTENT OF WHICH IS SHOWN FOR IDENTIFICATION PURPOSES COLOURED BLUE ON PLAN 5 APPENDED TO THIS ORDER IN SCHEDULE 2
- (6) THE FIRST CLAIMANT'S LATIMER PARK CORBY RETAIL DISTRIBUTION CENTRE AT HALLEY ROAD, CORBY NN17 5AN, THE EXTENT OF WHICH IS SHOWN FOR IDENTIFICATION PURPOSES COLOURED BLUE ON PLAN 6 APPENDED TO THIS ORDER IN SCHEDULE 2
- (7) THE FIRST CLAIMANT'S WILLOW GREEN RETAIL DISTRIBUTION CENTRE AT (A) KINGS DR, BRIDGWATER TA6 4FG; AND (B) BRISTOL ROAD, BRIDGWATER TA6 4BU, THE EXTENT OF WHICH IS SHOWN FOR IDENTIFICATION PURPOSES COLOURED BLUE ON PLANS 7.1 AND 7.2 APPENDED TO THIS ORDER IN SCHEDULE 2
- (8) THE FIRST CLAIMANT'S WAKEFIELD RETAIL DISTRIBUTION CENTRE AT KENMORE RD, WAKEFIELD INDUSTRIAL ESTATE, WAKEFIELD WF2 0XF, THE EXTENT OF WHICH IS SHOWN FOR IDENTIFICATION PURPOSES COLOURED BLUE ON PLAN 8 APPENDED TO THIS ORDER IN SCHEDULE 2

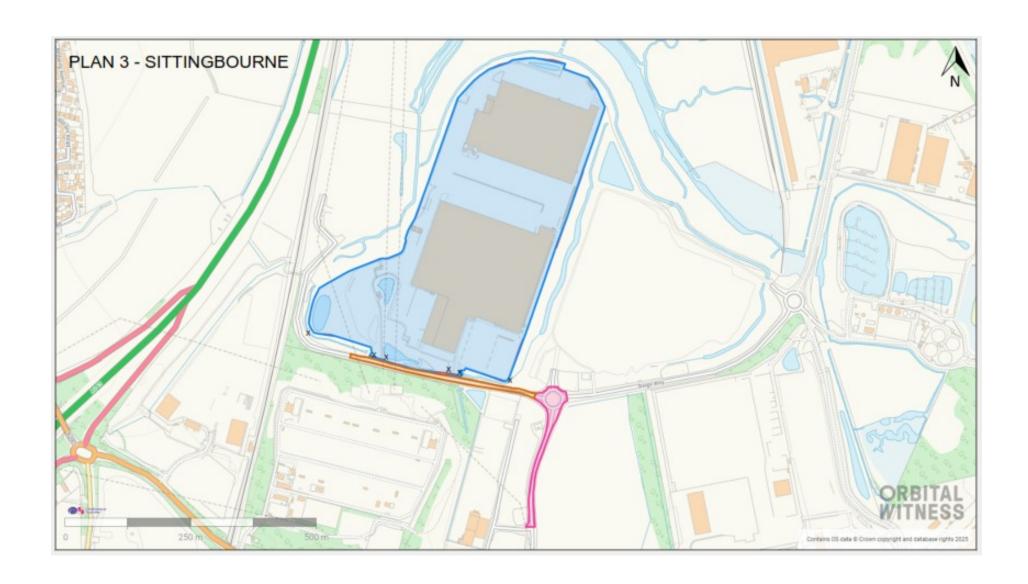
SCHEDULE 2 – PLANS TO THE SITES

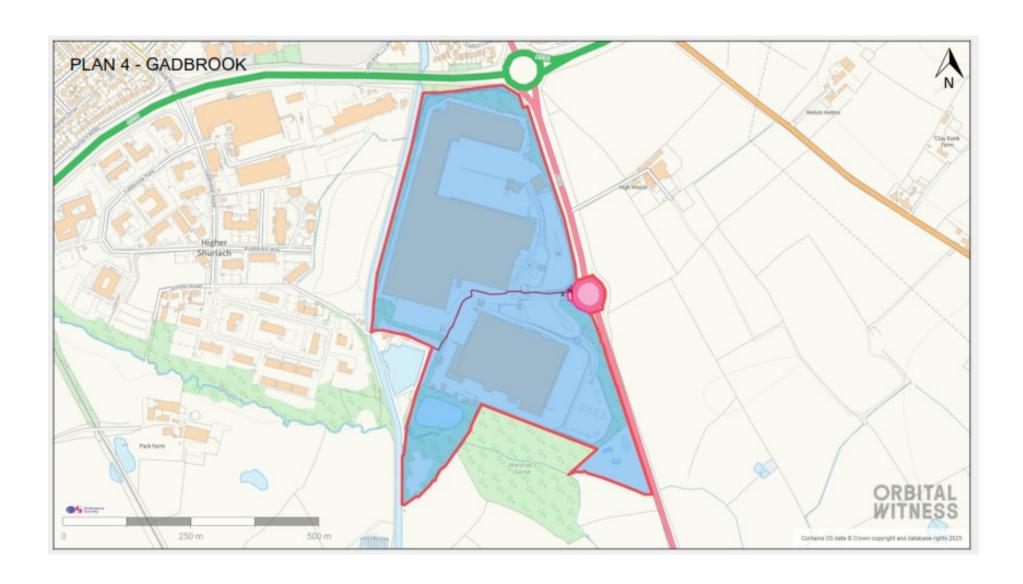


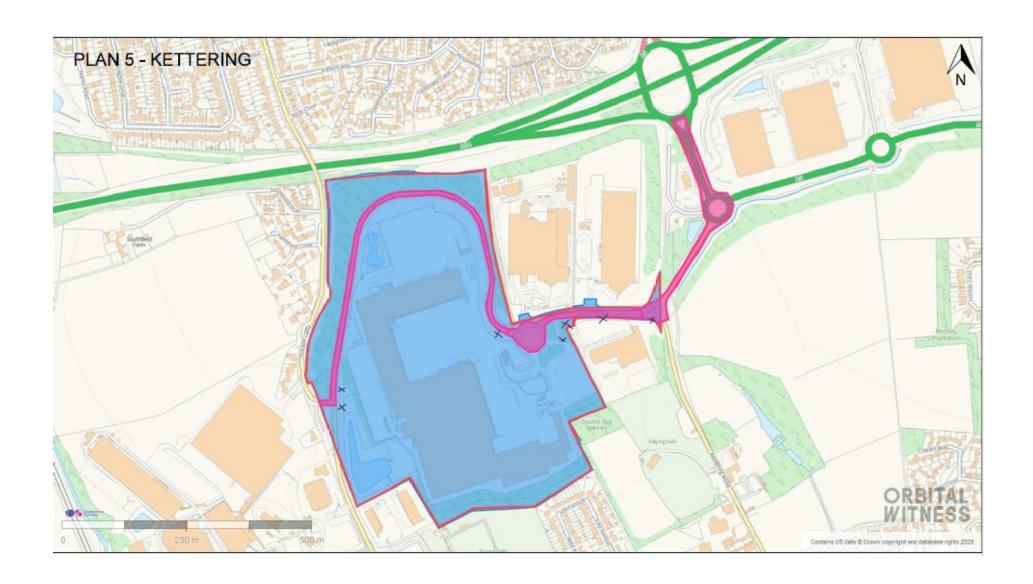




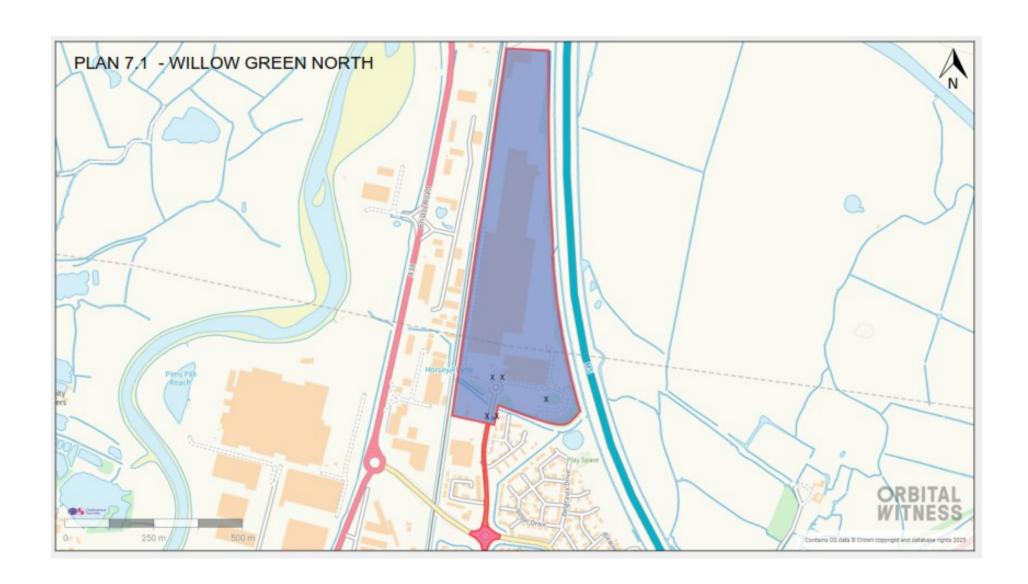




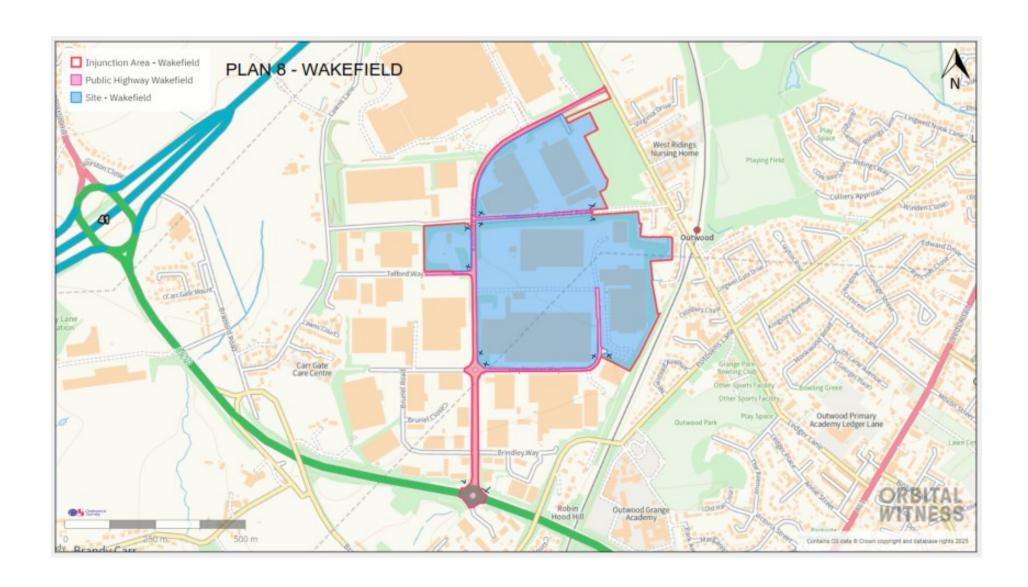












SCHEDULE 3 - UNDERTAKINGS GIVEN BY THE CLAIMANTS

- (1) The Claimants will take steps to serve the Defendants with a note of the hearing dated 16 January 2025 within 14 days of the date of this Order and provide the note of the hearing to the Court in order for it to be publicised on His Majesty's Courts and Tribunal Service website.
- (2) The Claimants will use best endeavours on an ongoing basis to identify any persons falling within the category of the Defendants and consider whether it is appropriate to join them as parties.
- (3) The Claimants will make any appropriate applications to justify the redaction of the witnesses' names and addresses prior to the return date.
- (4) The Claimants will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 6 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 4 – EMAIL ADDRESSES

info@farmerstoaction.org

SCHEDULE 5 – WARNING NOTICE

NOTICE OF HIGH COURT ORDER DATED 16 JANUARY 2025 ("the Order")

TO:

- 1. PERSONS UNKNOWN WHO ENTER AND REMAIN UPON ANY OF THE SITES WHICH ARE DEFINED IN SCHEDULE 1 TO THE CLAIM FORM WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM)
- 2. PERSONS UNKNOWN WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID SITES, WHICH ARE SHOWNS ON THE PLANS AT SCHEDULE 2 TO THE CLAIM FORM, WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM)

 ("the Defendants")

FROM: WM MORRISON SUPERMARKETS LIMITED ("the First Claimant")

This notice relates to the land known as **NORTHAMPTON VALLEY RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

- 1. entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the First Claimant; and
- 2. creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink and orange on the Plan).

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

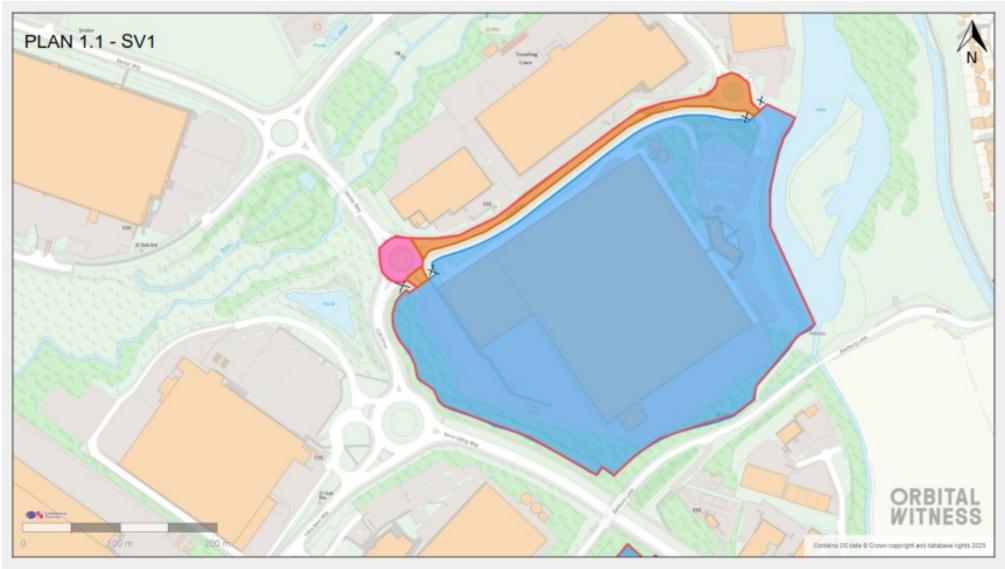
You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 16 January 2025 may be viewed at:

www.morrisons-corporate.com/injunction

Copies may also be obtained from the onsite security and operational offices or by contacting Andrew Todd of Eversheds Sutherland on 020 7919 4500 or by email andrewtodd@eversheds-sutherland.com.



NOTICE OF HIGH COURT ORDER DATED 16 JANUARY 2025 ("the Order")

TO:

- 1. PERSONS UNKNOWN WHO ENTER AND REMAIN UPON ANY OF THE SITES WHICH ARE DEFINED IN SCHEDULE 1 TO THE CLAIM FORM WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM)
- 2. PERSONS UNKNOWN WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID SITES, WHICH ARE SHOWNS ON THE PLANS AT SCHEDULE 2 TO THE CLAIM FORM, WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM)

("the Defendants")

FROM: WM MORRISON SUPERMARKETS LIMITED ("the First Claimant")

This notice relates to the land known as **NORTHAMPTON VALLEY RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

1. entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the First Claimant.

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it.

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- 2. PERSONS UNKNOWN WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID SITES, WHICH ARE SHOWNS ON THE PLANS AT SCHEDULE 2 TO THE CLAIM FORM, WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM)

("the Defendants")

FROM: WM MORRISON SUPERMARKETS LIMITED ("the First Claimant")

This notice relates to the land known as **NORTHAMPTON VALLEY RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

- 1. entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the First Claimant; and
- 2. creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink and orange on the Plan).

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 16 January 2025 may be viewed at: www.morrisons-corporate.com/injunction

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- 2. PERSONS UNKNOWN WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID SITES, WHICH ARE SHOWNS ON THE PLANS AT SCHEDULE 2 TO THE CLAIM FORM, WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM)

("the Defendants")

FROM: SAFEWAY STORES LIMITED

("the Second Claimant")

This notice relates to the land known as **STOCKTON DICKENS RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

- 1. entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the Second Claimant; and
- creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink on the Plan).

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 16 January 2025 may be viewed at: www.morrisons-corporate.com/injunction

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("the Defendants")

FROM: WM MORRISON SUPERMARKETS LIMITED ("the First Claimant")

This notice relates to the land known as **SITTINGBOURNE RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

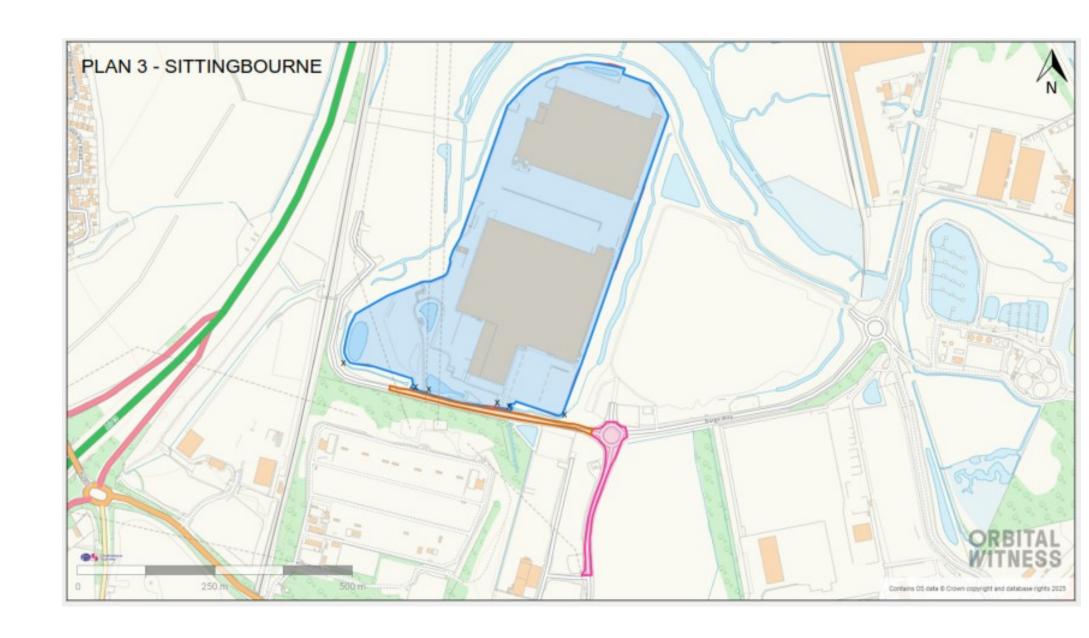
- 1. entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the First Claimant; and
- 2. creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink and orange on the Plan).

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it.

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- 2. PERSONS UNKNOWN WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID SITES, WHICH ARE SHOWNS ON THE PLANS AT SCHEDULE 2 TO THE CLAIM FORM, WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM)

FROM: WM MORRISON SUPERMARKETS LIMITED AND WM MORRISON PRODUCE LIMITED

("the First and Third Claimants")

This notice relates to the land known as **GADBROOK RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

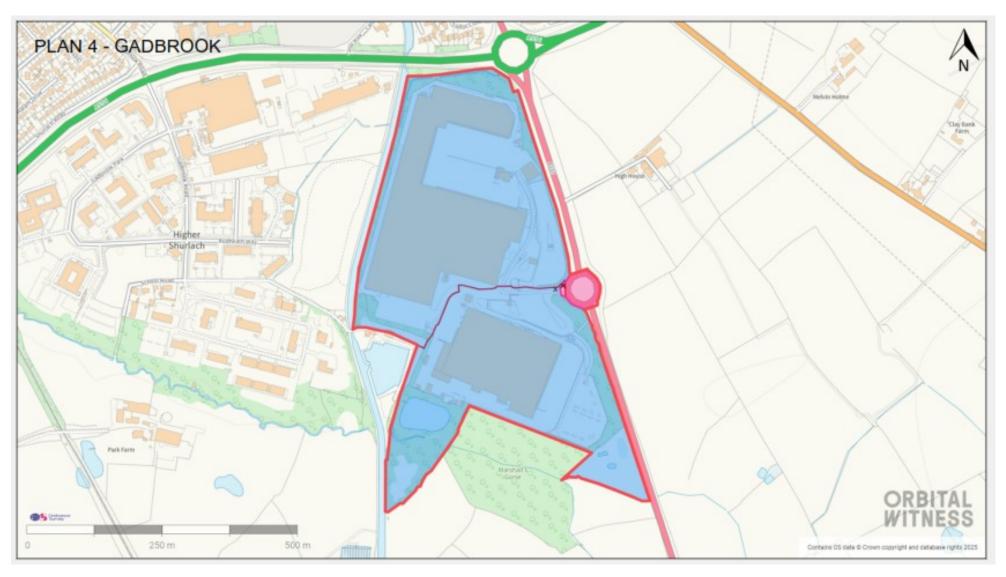
The Order prohibits:

- 1. entering or remaining upon any part of the land shown coloured blue on the Plan without the consent of the First and Third Claimants; and
- 2. creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink on the Plan).

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NOTICE OF HIGH COURT ORDER DATED 16 JANUARY 2025 ("the Order")

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("the Defendants")

FROM: WM MORRISON SUPERMARKETS LIMITED ("the First Claimant")

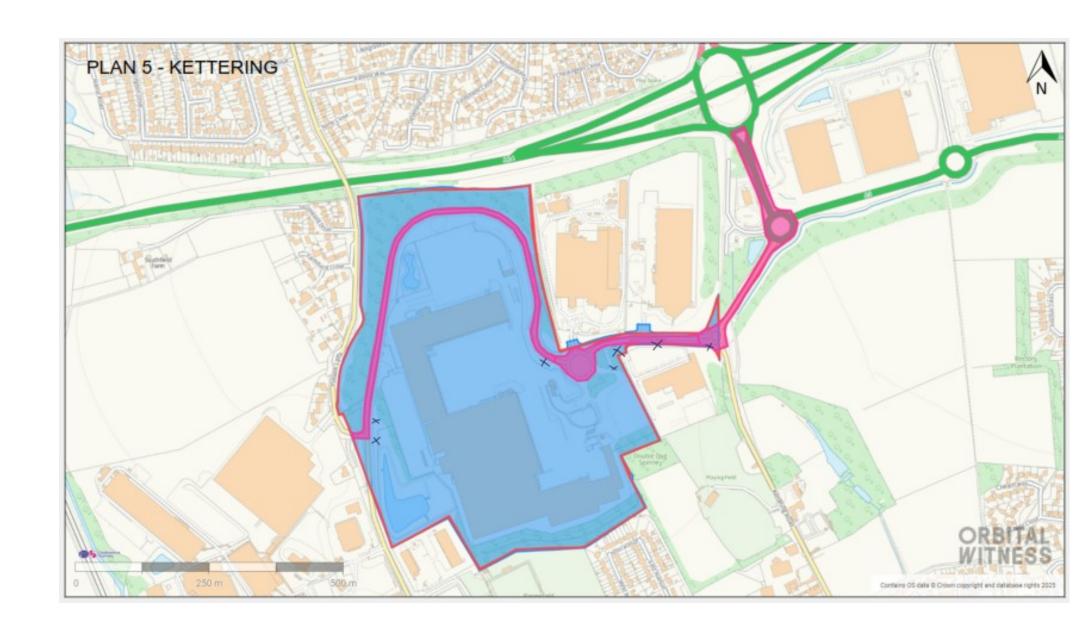
This notice relates to the land known as **LATIMER PARK KETTERING RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

- 1. entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the First Claimant; and
- 2. creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink on the Plan).

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized



NOTICE OF HIGH COURT ORDER DATED 16 JANUARY 2025 ("the Order")

TO:

- 1. PERSONS UNKNOWN WHO ENTER AND REMAIN UPON ANY OF THE SITES WHICH ARE DEFINED IN SCHEDULE 1 TO THE CLAIM FORM WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM)
- 2. PERSONS UNKNOWN WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID SITES, WHICH ARE SHOWNS ON THE PLANS AT SCHEDULE 2 TO THE CLAIM FORM, WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM)

("the Defendants")

FROM: WM MORRISON SUPERMARKETS LIMITED ("the First Claimant")

This notice relates to the land known as **LATIMER PARK CORBY RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

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- 2. creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink and orange on the Plan).

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NOTICE OF HIGH COURT ORDER DATED 16 JANUARY 2025 ("the Order")

TO:

- 1. PERSONS UNKNOWN WHO ENTER AND REMAIN UPON ANY OF THE SITES WHICH ARE DEFINED IN SCHEDULE 1 TO THE CLAIM FORM WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM)
- 2. PERSONS UNKNOWN WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID SITES, WHICH ARE SHOWNS ON THE PLANS AT SCHEDULE 2 TO THE CLAIM FORM, WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM)

("the Defendants")

FROM: WM MORRISON SUPERMARKETS LIMITED ("the First Claimant")

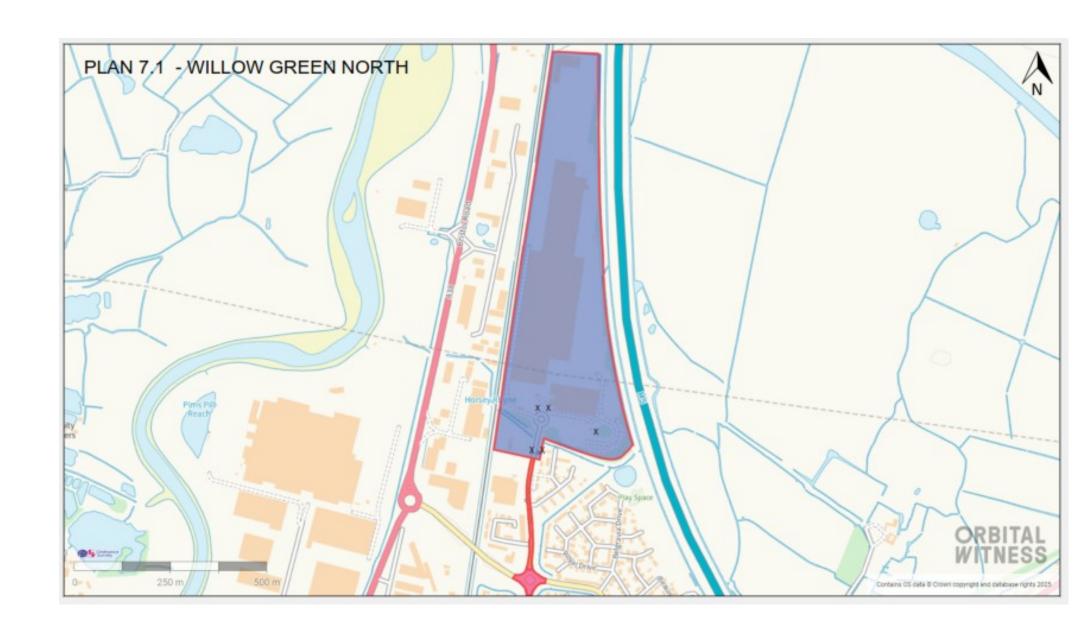
This notice relates to the land known as **WILLOW GREEN RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

- 1. entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the First Claimant; and
- 2. creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink on the Plan).

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NOTICE OF HIGH COURT ORDER DATED 16 JANUARY 2025 ("the Order")

TO:

- 1. PERSONS UNKNOWN WHO ENTER AND REMAIN UPON ANY OF THE SITES WHICH ARE DEFINED IN SCHEDULE 1 TO THE CLAIM FORM WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM)
- 2. PERSONS UNKNOWN WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID SITES, WHICH ARE SHOWNS ON THE PLANS AT SCHEDULE 2 TO THE CLAIM FORM, WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM)

("the Defendants")

FROM: WM MORRISON SUPERMARKETS LIMITED ("the First Claimant")

This notice relates to the land known as **WILLOW GREEN RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

- 1. entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the First Claimant; and
- 2. creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink on the Plan).

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized



NOTICE OF HIGH COURT ORDER DATED 16 JANUARY 2025 ("the Order")

TO:

- 1. PERSONS UNKNOWN WHO ENTER AND REMAIN UPON ANY OF THE SITES WHICH ARE DEFINED IN SCHEDULE 1 TO THE CLAIM FORM WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM)
- 2. PERSONS UNKNOWN WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID SITES, WHICH ARE SHOWNS ON THE PLANS AT SCHEDULE 2 TO THE CLAIM FORM, WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM)

("the Defendants")

FROM: WM MORRISON SUPERMARKETS LIMITED ("the First Claimant")

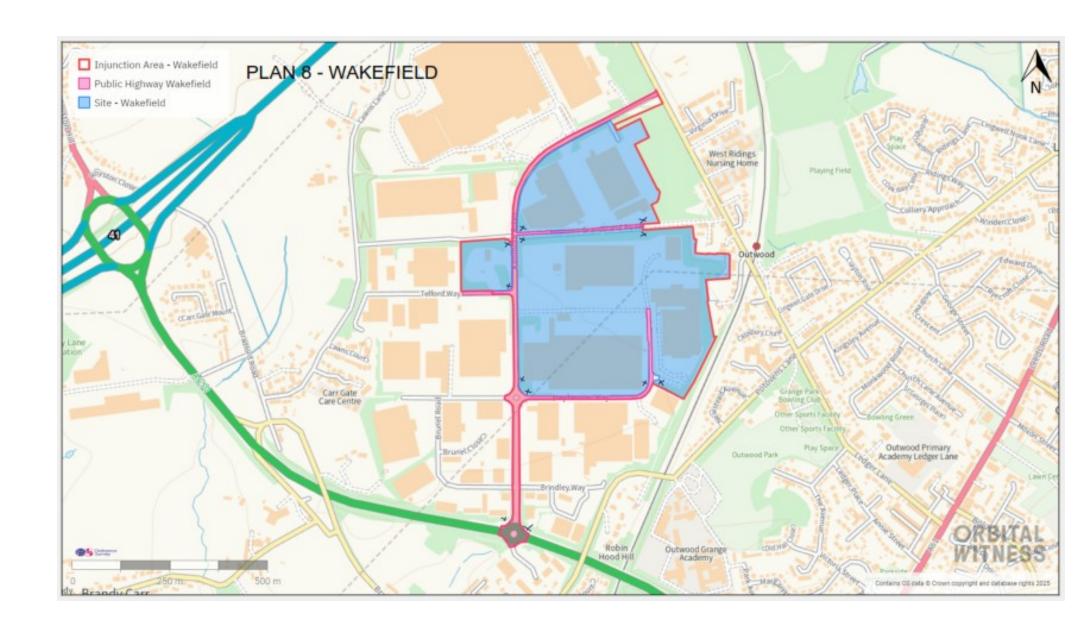
This notice relates to the land known as **WAKEFIELD RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

- 1. entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the First Claimant; and
- creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink on the Plan).

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized



CLAIM NO: KB-2025-000136

IN THE HIGH COURT OF JUSTICE KINGS BENCH DIVISION

BEFORE: THE HONOURABLE MR JUSTICE FORDHAM

DATED: 21 JANUARY 2025

BETWEEN:-

(1) WM MORRISON SUPERMARKETS LIMITED 1 Jan 2025 (2) SAFEWAY STORES LIMITED

(3) WM MORRISON PRODUCE LIMITED

S BENCH O

- V -

KB-2025-000136

(1) PERSONS UNKNOWN WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1 TO THIS ORDER (AND ALSO IN SCHEDULE 1 TO THE CLAIM FORM) WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS

(2) PERSONS UNKNOWN WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWN ON THE PLANS AT SCHEDULE 2 TO THIS ORDER (AND ALSO IN SCHEDULE 2 TO THE CLAIM FORM), WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS

	<u>Defendants</u>
ORDER	_
DENAL MORICE	_

PENAL NOTICE

IF YOU, THE DEFENDANTS, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR ANY OF THEM TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN

CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).

UPON the Claimants' claim by the Claim Form dated 15 January 2025

AND UPON the Claimants' application for an injunction dated 15 January 2025 (the "**Application**")

AND UPON the making of injunctions by Order dated 16 January 2025 by Mrs Justice Collins Rice (the "Collins Rice J Order") which was continued by Order dated 20 January 2025 by Mr Justice Fordham (the "First Fordham J Order"), both of which are available at www.morrisons-corporate.com/injunction

AND UPON reading the Application and the witness statements filed in support of it (the "Witness Statements") and hearing Leading and Junior Counsel for the Claimants at the return date of 20 January 2025, there being no other attendance

AND UPON reading an email from info@farmerstoaction.org dated 20 January 2025 at 9:00am

AND UPON Fordham J having given brief reasons orally incorporated within a written judgment [2025] EWHC 83 (KB) to be available at www.morrisons-corporate.com/injunction

AND UPON the Court being satisfied, on the evidence and submissions before it as to circumstances and investigations made by or available to the Claimants, that the Claimants have thereby taken all practicable steps to notify the Defendants of the Application prior to the initial return date of 20 January 2025 pursuant to section 12(1) and (2) of the Human Rights Act 1998

AND UPON the Court having carefully considered the grounds for the Application, the evidence and any arguable defences that might be raised by the Defendants and being satisfied that the Claimants have established, on the evidence filed by the Claimants, that: (1) the

Claimants have a good cause of action in relation to each of the Distribution Centres and the Access Roads, in respect of which they are likely to succeed at trial pursuant to section 12(3) of the Human Rights Act 1998; (2) the Claimants have complied with the duty of full and frank disclosure; (3) there is sufficient evidence of a real and imminent risk of tortious activity and real harm; (4) there is no realistic defence to the claim; (5) there is a compelling justification for the injunctions sought; and (6) damages would not be an adequate remedy

AND UPON the Court being satisfied that the relevant procedural requirements for the grant of injunctions against "Persons Unknown" have been established by the Claimants on the evidence and that the terms of the Order are clear and appropriate and, in the circumstances, that it is just and convenient to grant the injunctions sought

AND UPON the Claimants confirming that this order is not intended to prohibit any lawful protest outside the Distribution Centres in so far as any such protest does not obstruct any of the pedestrian and vehicular entrances or exits to the Distribution Centres

AND UPON the Claimants giving and the Court accepting the undertakings set out in Schedule 3 to this order

AND in replacement of the injunctions granted by the Collins Rice J Order and continued by the First Fordham J Order, but with the intention that the provisions for alternative service set out in paragraphs 8-12 and 14 of the Collins Rice J Order shall remain unaffected and in force

IT IS ORDERED THAT:

DEFINITIONS

- 1. "The Distribution Centres" means the land defined in Schedule 1 to this order, the extent of which is shown for identification purposes coloured blue on each of the relevant plans appended to this order in Schedule 2 ("the Plans").
- 2. "The Access Roads" means the roads which provide direct access to each of the relevant Distribution Centres, the extent of which is shown for identification purposes in pink and/or orange on the Plans.
- 3. "Warning Notices" means notices in the form as set out in Schedule 5 to this order (and warning of the existence and general nature of this order, the consequences of breaching

it, identifying a point of contact and contact details from which copies of the order may be requested and identifying the website address <u>www.morrisons-corporate.com/injunction</u> at which copies of this order may be viewed and downloaded).

PERMISSION TO AMEND

4. The Claimants have permission to re-amend the claim form in order to re-amend the description of the Defendants by substituting the reference to "Sites" for "Distribution Centres", correcting the reference to "regional distribution centres" in paragraph 3 of the details of claim and updating Schedules 1 and 2 to the claim form.

INJUNCTION

- 5. Subject to paragraph 8 below, this order shall operate with immediate effect until varied, discharged or extended by further order.
- 6. The Defendants and each of them <u>must not</u> do any of the acts listed in paragraph 7 of this order.
- 7. The acts referred to in paragraph 6 of this order are:
 - a. entering, occupying or remaining upon any part of the Distribution Centres without the consent of the Claimants in connection with agricultural protests;
 - b. creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants, its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the Access Roads in connection with agricultural protests.
- 8. There is to be a further return date of the Application, listed for 28 January 2025 at 12pm, with a time estimate of three and a half hours at which the Court will consider whether the injunctions granted by this order shall continue for a further period and, if appropriate, give case management directions for the progression of the claim

FURTHER DIRECTIONS

- 9. The Defendants and any persons affected by this order who wish to attend the return date hearing and make representations to the Court shall provide their written representations and any evidence which is to be relied upon by them at the hearing of the return date to the Claimants' solicitors by no later than 4pm on 24 January 2025.
- 10. No acknowledgment of service, admission or defence is required by any party until further so ordered.
- 11. Costs are reserved.

COMMUNICATIONS WITH THE CLAIMANTS

- 12. The Claimants' solicitors and their contact details are:
 - (1) Andrew Todd Eversheds Sutherland (International) LLP andrewtodd@eversheds-sutherland.com
 - (2) Alex Wright
 Eversheds Sutherland (International) LLP
 alexwright@eversheds-sutherland.com

SCHEDULE 1 - THE DISTRIBUTION CENTRES

THE DISTRIBUTION CENTRES BEING:

- (1) THE FIRST CLAIMANT'S NORTHAMPTON VALLEY RETAIL DISTRIBUTION CENTRE AT (A) COB DRIVE, SWAN VALLEY, NORTHAMPTON NN4 9BB; (B) DC2, SWAN VALLEY, NORTHAMPTON NN4 9BD; AND (C) (SV3), UPTON, NORTHAMPTON, THE EXTENT OF WHICH IS SHOWN FOR IDENTIFICATION PURPOSES COLOURED BLUE ON PLAN 1.1., 1.2, AND 1.3, APPENDED TO THIS ORDER IN SCHEDULE 2
- (2) THE SECOND CLAIMANT'S STOCKTON DICKENS RETAIL DISTRIBUTION CENTRE MALLEABLE WAY, STOCKTON-ON-TEES, TS18 2QZ, THE EXTENT OF WHICH IS SHOWN FOR IDENTIFICATION PURPOSES COLOURED BLUE ON PLAN 2 APPENDED TO THIS ORDER IN SCHEDULE 2
- (3) THE FIRST CLAIMANT'S SITTINGBOURNE RETAIL DISTRIBUTION CENTRE AT G PARK, SITTINGBOURNE ME10 2FD, THE EXTENT OF WHICH IS SHOWN FOR IDENTIFICATION PURPOSES COLOURED BLUE ON PLAN 3 APPENDED TO THIS ORDER IN SCHEDULE 2
- (4) THE FIRST AND THIRD CLAIMANTS' GADBROOK RETAIL DISTRIBUTION CENTRE AT KING ST, RUDHEATH, NORTHWICH CW9 7WA, THE EXTENT OF WHICH IS SHOWN FOR IDENTIFICATION PURPOSES COLOURED BLUE ON PLAN 4 APPENDED TO THIS ORDER IN SCHEDULE 2
- (5) THE FIRST CLAIMANT'S LATIMER PARK KETTERING RETAIL DISTRIBUTION CENTRE AT ALTENDIEZ WAY, BURTON LATIMER, KETTERING NN15 5YT, THE EXTENT OF WHICH IS SHOWN FOR IDENTIFICATION PURPOSES COLOURED BLUE ON PLAN 5 APPENDED TO THIS ORDER IN SCHEDULE 2
- (6) THE FIRST CLAIMANT'S LATIMER PARK CORBY RETAIL DISTRIBUTION CENTRE AT HALLEY ROAD, CORBY NN17 5AN, THE EXTENT OF WHICH IS SHOWN FOR IDENTIFICATION PURPOSES COLOURED BLUE ON PLAN 6 APPENDED TO THIS ORDER IN SCHEDULE 2
- (7) THE FIRST CLAIMANT'S WILLOW GREEN RETAIL DISTRIBUTION CENTRE AT
 (A) KINGS DR, BRIDGWATER TA6 4FG; AND (B) BRISTOL ROAD,
 BRIDGWATER TA6 4BU, THE EXTENT OF WHICH IS SHOWN FOR
 IDENTIFICATION PURPOSES COLOURED BLUE ON PLANS 7.1 AND 7.2
 APPENDED TO THIS ORDER IN SCHEDULE 2
- (8) THE FIRST CLAIMANT'S WAKEFIELD RETAIL DISTRIBUTION CENTRE AT KENMORE RD, WAKEFIELD INDUSTRIAL ESTATE, WAKEFIELD WF2 0XF, THE EXTENT OF WHICH IS SHOWN FOR IDENTIFICATION PURPOSES COLOURED BLUE ON PLAN 8 APPENDED TO THIS ORDER IN SCHEDULE 2

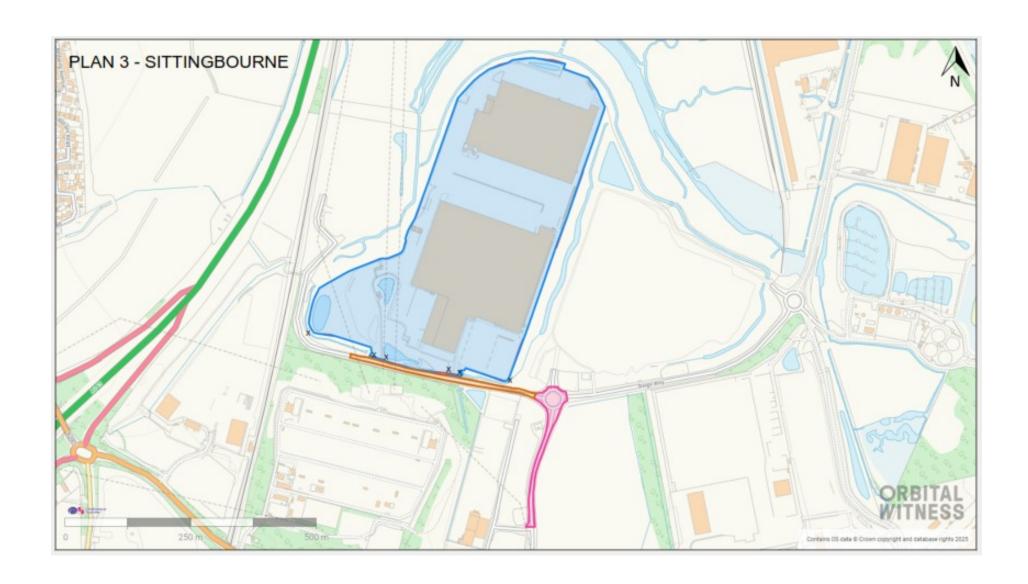
SCHEDULE 2 – PLANS TO THE DISTRIBUTION CENTRES

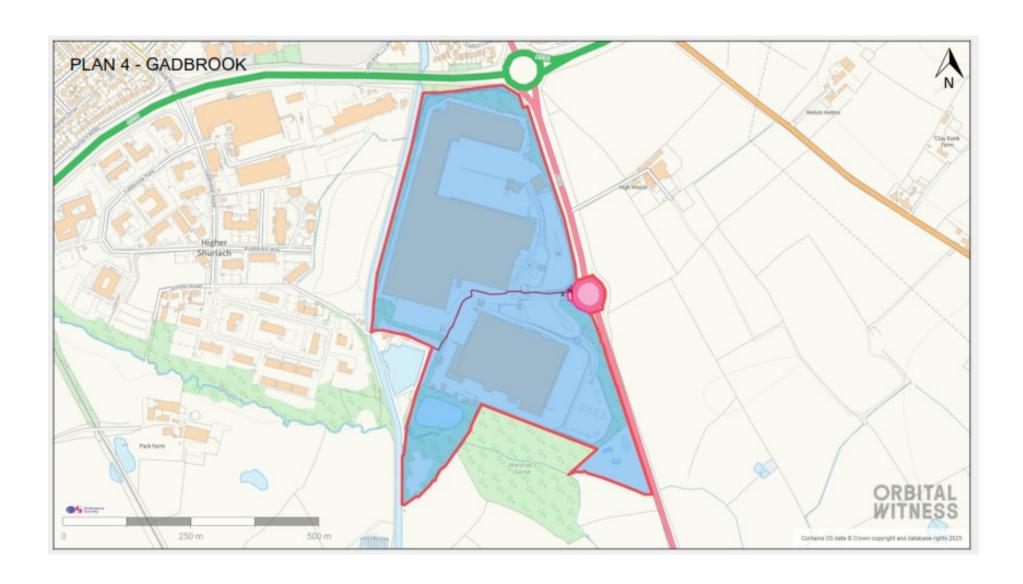


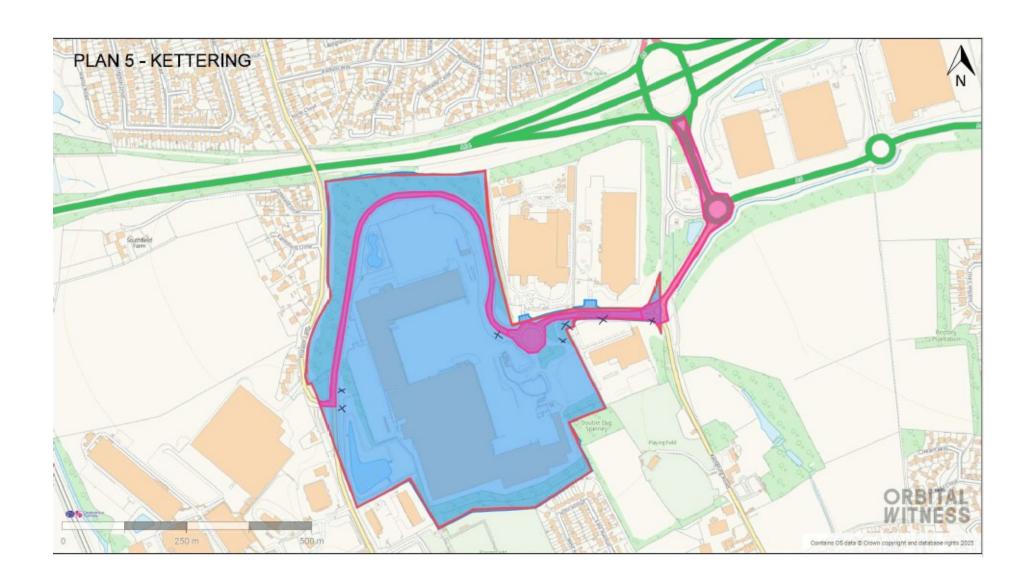




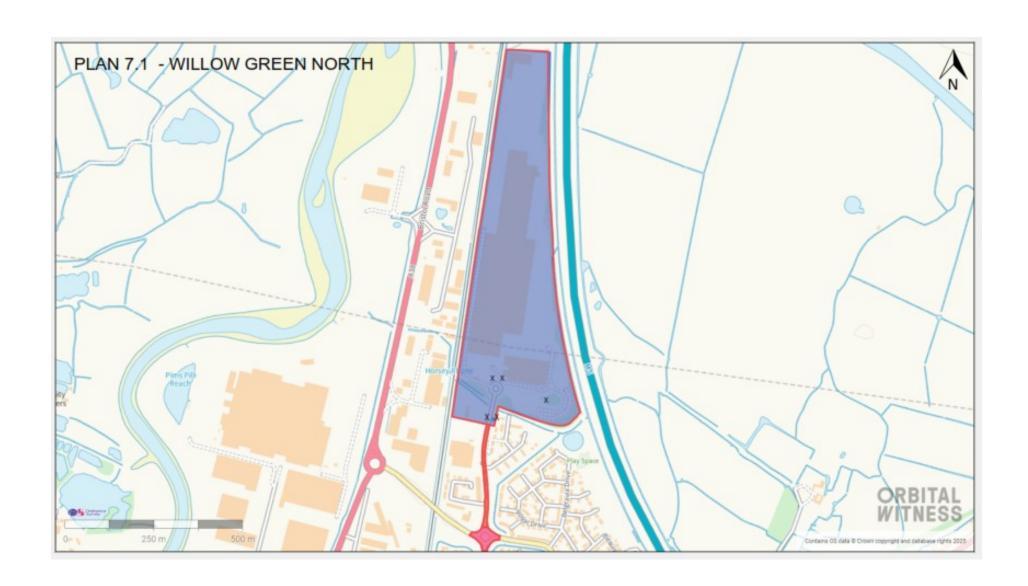




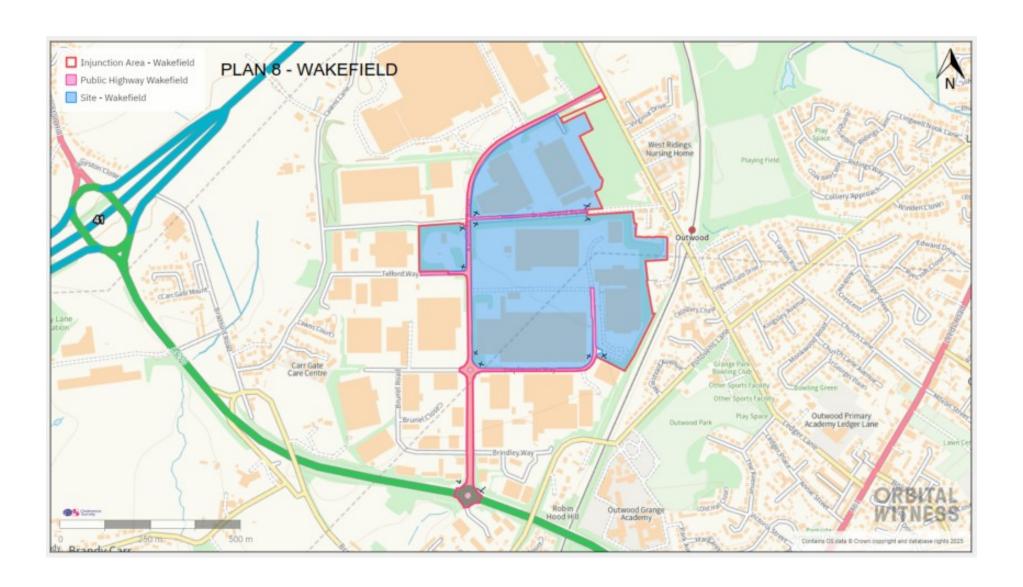












SCHEDULE 3 - UNDERTAKINGS GIVEN BY THE CLAIMANTS

- (1) The Claimants will, as soon as practicable take steps (a) to serve the Defendants with a note of the hearing dated 20 January 2025 and (b) to obtain transcript of the hearings on 16 and 20 January 2025 to supply to the clerks to Collins Rice J and Fordham J, for publication on the Courts and Tribunals Judiciary website.
- (2) The Claimants will upload any documents in the proceedings to <u>www.morrisons-corporate.com/injunction.</u>
- (3) The Claimants will use best endeavours on an ongoing basis to identify any persons falling within the category of the Defendants and consider whether it is appropriate to join them as parties.
- (4) The Claimants will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 6 of this order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 4 – EMAIL ADDRESSES

info@farmerstoaction.org

SCHEDULE 5 – WARNING NOTICE

NOTICE OF HIGH COURT ORDER DATED 21 JANUARY 2025 ("the Order")

TO:

- (1) PERSONS UNKNOWN WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1 TO THIS ORDER (AND ALSO IN SCHEDULE 1 TO THE CLAIM FORM) WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS
- (2) PERSONS UNKNOWN WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWN ON THE PLANS AT SCHEDULE 2 TO THIS ORDER (AND ALSO IN SCHEDULE 2 TO THE CLAIM FORM), WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS

("the Defendants")

FROM: WM MORRISON SUPERMARKETS LIMITED ("the First Claimant")

This notice relates to the land known as **NORTHAMPTON VALLEY RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

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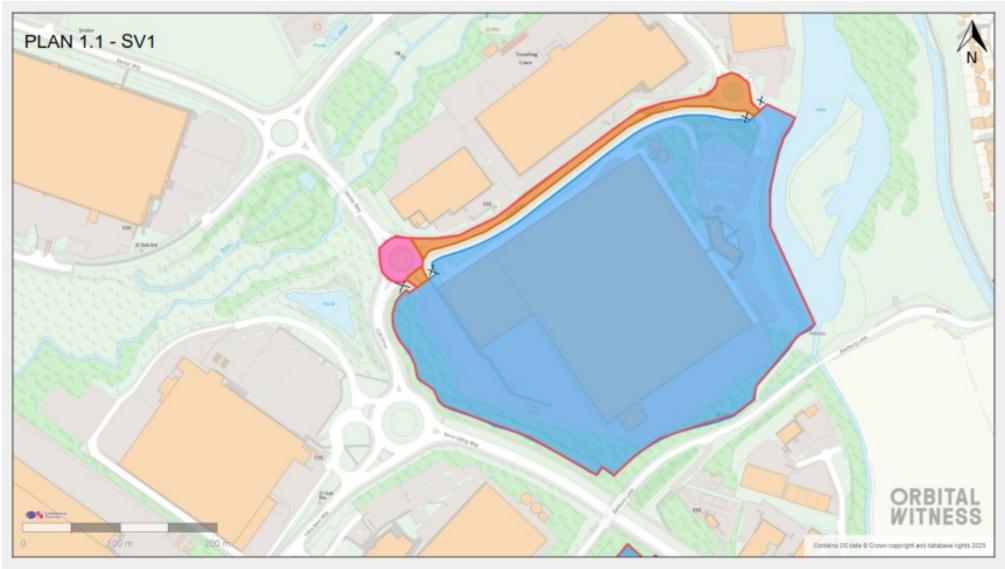
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 20 January 2025 may be viewed at:

www.morrisons-corporate.com/injunction



NOTICE OF HIGH COURT ORDER DATED 21 JANUARY 2025 ("the Order")

TO:

- (1) PERSONS UNKNOWN WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1 TO THIS ORDER (AND ALSO IN SCHEDULE 1 TO THE CLAIM FORM) WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS
- (2) PERSONS UNKNOWN WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWN ON THE PLANS AT SCHEDULE 2 TO THIS ORDER (AND ALSO IN SCHEDULE 2 TO THE CLAIM FORM), WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS

("the Defendants")

FROM: WM MORRISON SUPERMARKETS LIMITED ("the First Claimant")

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NOTICE OF HIGH COURT ORDER DATED 21 JANUARY 2025 ("the Order")

TO:

- (1) PERSONS UNKNOWN WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1 TO THIS ORDER (AND ALSO IN SCHEDULE 1 TO THE CLAIM FORM) WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS
- (2) PERSONS UNKNOWN WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWN ON THE PLANS AT SCHEDULE 2 TO THIS ORDER (AND ALSO IN SCHEDULE 2 TO THE CLAIM FORM), WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS

("the Defendants")

FROM: WM MORRISON SUPERMARKETS LIMITED ("the First Claimant")

This notice relates to the land known as **NORTHAMPTON VALLEY RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

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NOTICE OF HIGH COURT ORDER DATED 21 JANUARY 2025 ("the Order")

TO:

- (1) PERSONS UNKNOWN WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1 TO THIS ORDER (AND ALSO IN SCHEDULE 1 TO THE CLAIM FORM) WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS
- (2) PERSONS UNKNOWN WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWN ON THE PLANS AT SCHEDULE 2 TO THIS ORDER (AND ALSO IN SCHEDULE 2 TO THE CLAIM FORM), WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS

("the Defendants")

FROM: SAFEWAY STORES LIMITED

("the Second Claimant")

This notice relates to the land known as **STOCKTON DICKENS RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

- 1. entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the Second Claimant; and
- creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink on the Plan).

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NOTICE OF HIGH COURT ORDER DATED 21 JANUARY 2025 ("the Order")

TO:

(1) PERSONS UNKNOWN WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1 TO THIS ORDER (AND ALSO IN SCHEDULE 1 TO THE CLAIM FORM) WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS

(2) PERSONS UNKNOWN WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWN ON THE PLANS AT SCHEDULE 2 TO THIS ORDER (AND ALSO IN SCHEDULE 2 TO THE CLAIM FORM), WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS

("the Defendants")

FROM: WM MORRISON SUPERMARKETS LIMITED ("the First Claimant")

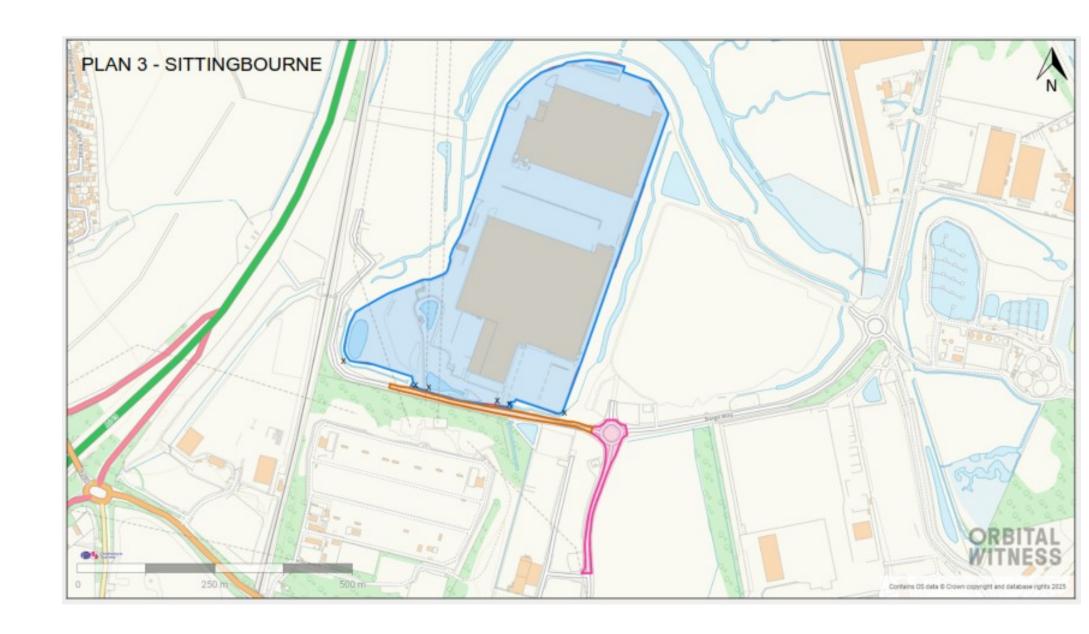
This notice relates to the land known as **SITTINGBOURNE RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

- 1. entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the First Claimant; and
- 2. creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink and orange on the Plan).

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized



NOTICE OF HIGH COURT ORDER DATED 21 JANUARY 2025 ("the Order")

TO:

- (1) PERSONS UNKNOWN WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1 TO THIS ORDER (AND ALSO IN SCHEDULE 1 TO THE CLAIM FORM) WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS
- (2) PERSONS UNKNOWN WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWN ON THE PLANS AT SCHEDULE 2 TO THIS ORDER (AND ALSO IN SCHEDULE 2 TO THE CLAIM FORM), WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS

("the Defendants")

FROM: WM MORRISON SUPERMARKETS LIMITED AND WM MORRISON PRODUCE LIMITED

("the First and Third Claimants")

This notice relates to the land known as **GADBROOK RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

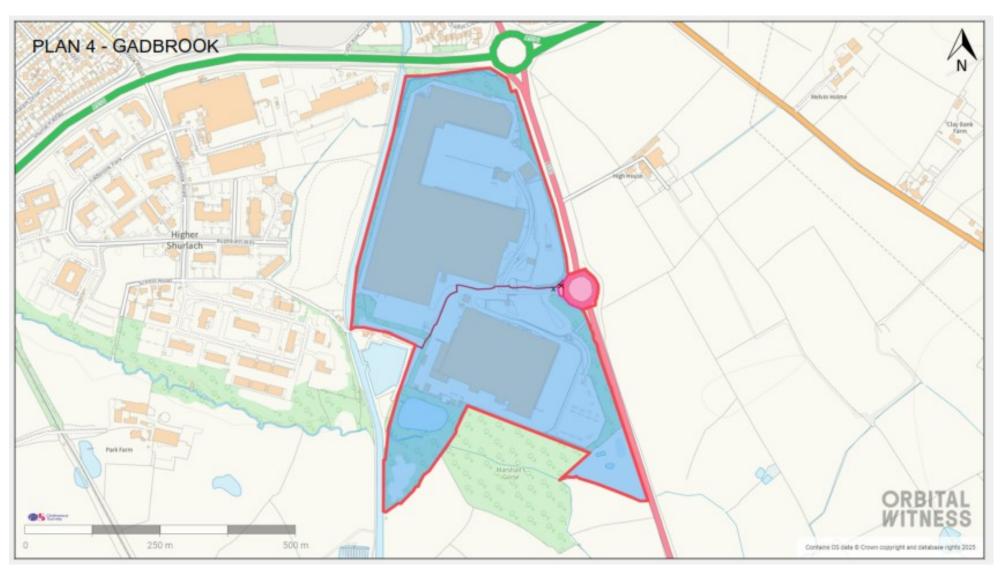
The Order prohibits:

- 1. entering or remaining upon any part of the land shown coloured blue on the Plan without the consent of the First and Third Claimants; and
- creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink on the Plan).

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 20 January 2025 may be viewed at: www.morrisons-corporate.com/injunction



NOTICE OF HIGH COURT ORDER DATED 21 JANUARY 2025 ("the Order")

TO:

- (1) PERSONS UNKNOWN WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1 TO THIS ORDER (AND ALSO IN SCHEDULE 1 TO THE CLAIM FORM) WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS
- (2) PERSONS UNKNOWN WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWN ON THE PLANS AT SCHEDULE 2 TO THIS ORDER (AND ALSO IN SCHEDULE 2 TO THE CLAIM FORM), WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS

("the Defendants")

FROM: WM MORRISON SUPERMARKETS LIMITED ("the First Claimant")

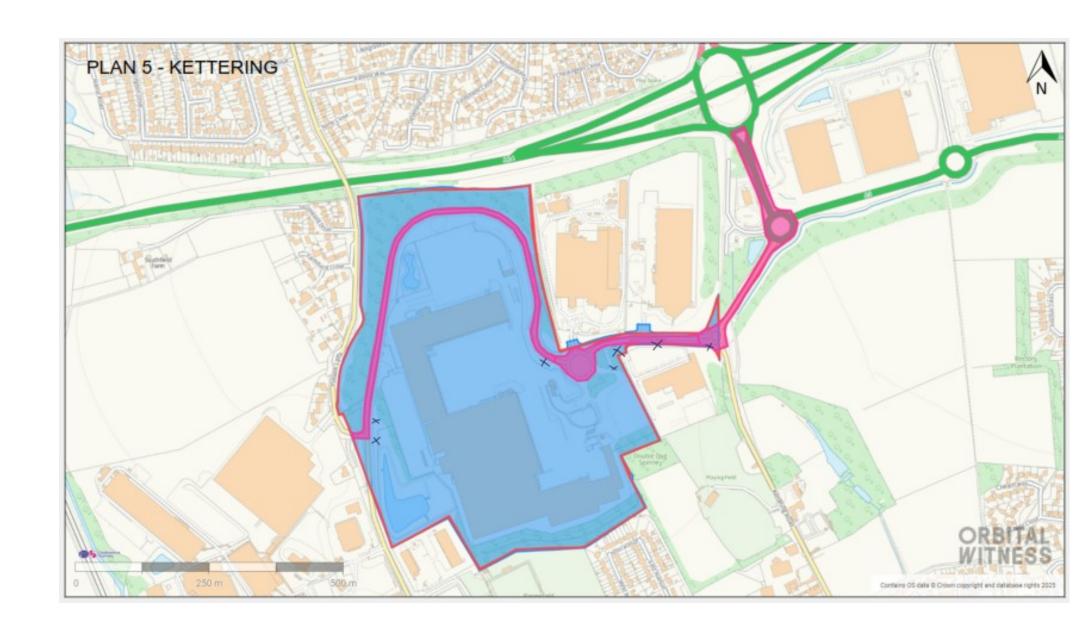
This notice relates to the land known as **LATIMER PARK KETTERING RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

- 1. entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the First Claimant; and
- 2. creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink on the Plan).

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized



NOTICE OF HIGH COURT ORDER DATED 21 JANUARY 2025 ("the Order")

TO:

- (1) PERSONS UNKNOWN WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1 TO THIS ORDER (AND ALSO IN SCHEDULE 1 TO THE CLAIM FORM) WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS
- (2) PERSONS UNKNOWN WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWN ON THE PLANS AT SCHEDULE 2 TO THIS ORDER (AND ALSO IN SCHEDULE 2 TO THE CLAIM FORM), WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS

("the Defendants")

FROM: WM MORRISON SUPERMARKETS LIMITED ("the First Claimant")

This notice relates to the land known as **LATIMER PARK CORBY RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

- 1. entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the First Claimant; and
- 2. creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink and orange on the Plan).

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized



NOTICE OF HIGH COURT ORDER DATED 21 JANUARY 2025 ("the Order")

TO:

- (1) PERSONS UNKNOWN WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1 TO THIS ORDER (AND ALSO IN SCHEDULE 1 TO THE CLAIM FORM) WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS
- (2) PERSONS UNKNOWN WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWN ON THE PLANS AT SCHEDULE 2 TO THIS ORDER (AND ALSO IN SCHEDULE 2 TO THE CLAIM FORM), WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS

("the Defendants")

FROM: WM MORRISON SUPERMARKETS LIMITED ("the First Claimant")

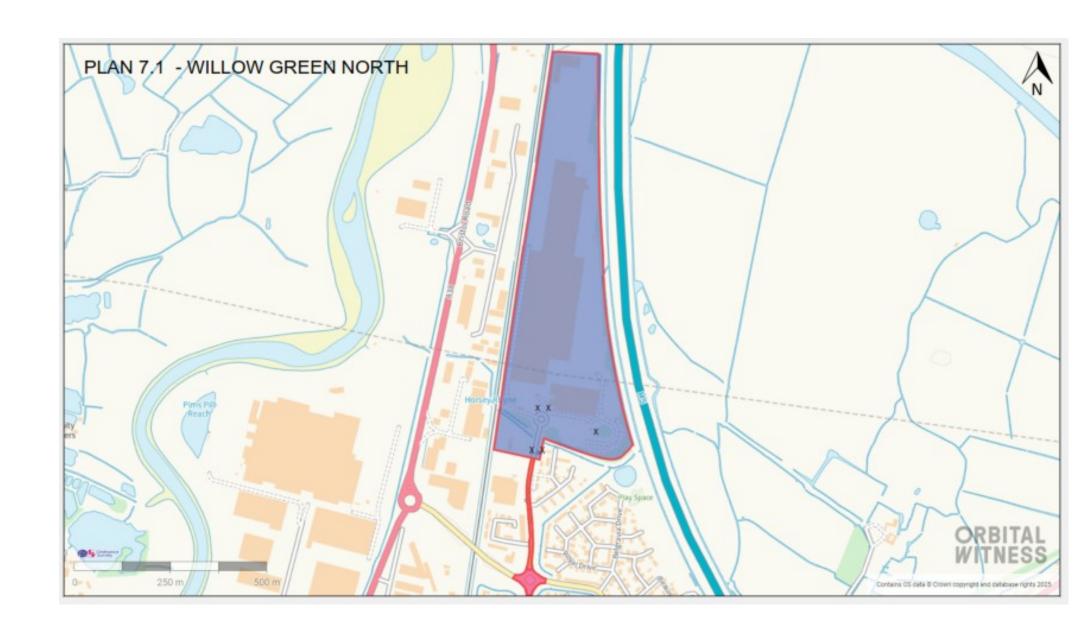
This notice relates to the land known as **WILLOW GREEN RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

- 1. entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the First Claimant; and
- creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink on the Plan).

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized



NOTICE OF HIGH COURT ORDER DATED 21 JANUARY 2025 ("the Order")

TO:

- (1) PERSONS UNKNOWN WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1 TO THIS ORDER (AND ALSO IN SCHEDULE 1 TO THE CLAIM FORM) WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS
- (2) PERSONS UNKNOWN WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWN ON THE PLANS AT SCHEDULE 2 TO THIS ORDER (AND ALSO IN SCHEDULE 2 TO THE CLAIM FORM), WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS

("the Defendants")

FROM: WM MORRISON SUPERMARKETS LIMITED ("the First Claimant")

This notice relates to the land known as **WILLOW GREEN RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

- 1. entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the First Claimant; and
- 2. creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink on the Plan).

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 20 January 2025 may be viewed at: www.morrisons-corporate.com/injunction



NOTICE OF HIGH COURT ORDER DATED 21 JANUARY 2025 ("the Order")

TO:

- (1) PERSONS UNKNOWN WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1 TO THIS ORDER (AND ALSO IN SCHEDULE 1 TO THE CLAIM FORM) WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS
- (2) PERSONS UNKNOWN WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWN ON THE PLANS AT SCHEDULE 2 TO THIS ORDER (AND ALSO IN SCHEDULE 2 TO THE CLAIM FORM), WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS

("the Defendants")

FROM: WM MORRISON SUPERMARKETS LIMITED ("the First Claimant")

This notice relates to the land known as **WAKEFIELD RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

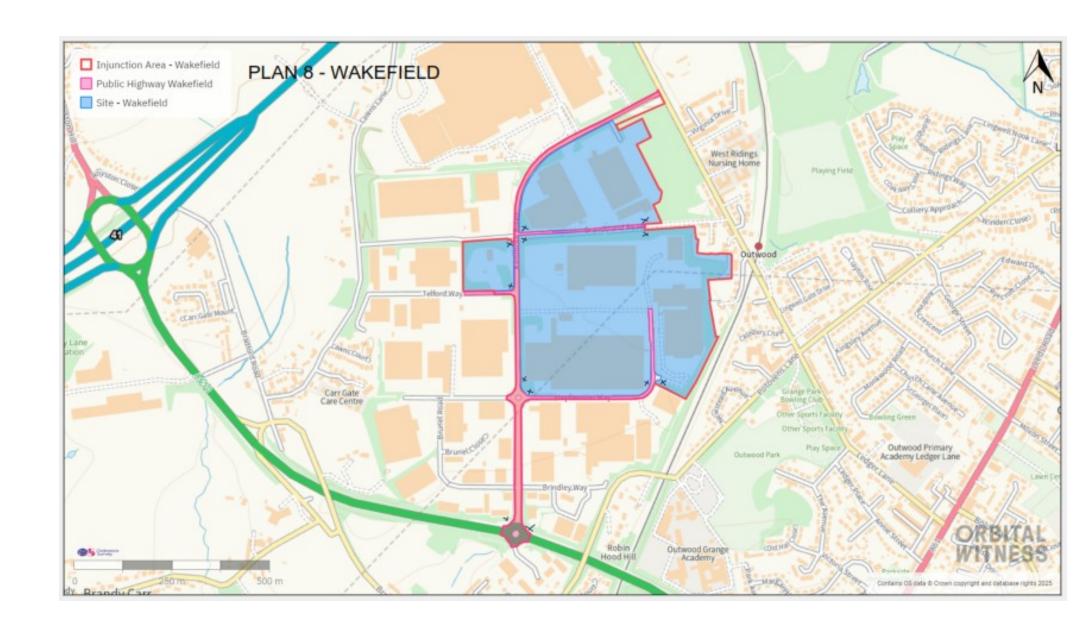
- 1. entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the First Claimant; and
- creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink on the Plan).

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 20 January 2025 may be viewed at: www.morrisons-corporate.com/injunction



Amended 24.1.25

IN THE HIGH COURT OF JUSTICE KINGS BENCH DIVISION

BEFORE: THE HONOURABLE MR JUSTICE FORDHAM

DATED: 21 JANUARY 2025

BETWEEN:-



CLAIM NO: KB-2025-000136

(1) WM MORRISON SUPERMARKETS LIMITED
(2) SAFEWAY STORES LIMITED

(3) WM MORRISON PRODUCE LIMITED

Claimants

- V -

- (1) PERSONS UNKNOWN WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1 TO THE CLAIM FORM WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS
 - (2) PERSONS UNKNOWN WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWNS ON THE PLANS AT SCHEDULE 2 TO THE CLAIM FORM, WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS

	Defendants
ORDER	_
PENAL NOTICE	<u> </u>

IF YOU, THE DEFENDANTS, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR ANY OF THEM TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN

CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).

UPON the Claimants' claim by the Claim Form dated 15 January 2025

AND UPON the Claimants' application for an injunction dated 15 January 2025 (the "Application")

AND UPON the making of injunctions by Order dated 16 January 2025 by Mrs Justice Collins Rice (the "Collins Rice J Order") which was continued by Order dated 20 January 2025 by Mr Justice Fordham (the "First Fordham J Order"), both of which are available at www.morrisons-corporate.com/injunction

AND UPON reading the Application and the witness statements filed in support of it (the "Witness Statements") and hearing Leading and Junior Counsel for the Claimants at the return date of 20 January 2025, there being no other attendance

AND UPON reading an email from info@farmerstoaction.org dated 20 January 2025 at 9:00am

AND UPON Fordham J having given brief reasons orally incorporated within a written judgment [2025] EWHC 83 (KB) to be available at www.morrisons-corporate.com/injunction

AND UPON the Court being satisfied, on the evidence and submissions before it as to circumstances and investigations made by or available to the Claimants, that the Claimants have thereby taken all practicable steps to notify the Defendants of the Application prior to the initial return date of 20 January 2025 pursuant to section 12(1) and (2) of the Human Rights Act 1998

AND UPON the Court having carefully considered the grounds for the Application, the evidence and any arguable defences that might be raised by the Defendants and being satisfied

that the Claimants have established, on the evidence filed by the Claimants, that: (1) the Claimants have a good cause of action in relation to each of the Distribution Centres and the Access Roads, in respect of which they are likely to succeed at trial pursuant to section 12(3) of the Human Rights Act 1998; (2) the Claimants have complied with the duty of full and frank disclosure; (3) there is sufficient evidence of a real and imminent risk of tortious activity and real harm; (4) there is no realistic defence to the claim; (5) there is a compelling justification for the injunctions sought; and (6) damages would not be an adequate remedy

AND UPON the Court being satisfied that the relevant procedural requirements for the grant of injunctions against "Persons Unknown" have been established by the Claimants on the evidence and that the terms of the Order are clear and appropriate and, in the circumstances, that it is just and convenient to grant the injunctions sought

AND UPON the Claimants confirming that this order is not intended to prohibit any lawful protest outside the Distribution Centres in so far as any such protest does not obstruct any of the pedestrian and vehicular entrances or exits to the Distribution Centres

AND UPON the Claimants giving and the Court accepting the undertakings set out in Schedule 3 to this order

AND in replacement of the injunctions granted by the Collins Rice J Order and continued by the First Fordham J Order, but with the intention that the provisions for alternative service set out in paragraphs 8-12 and 14 of the Collins Rice J Order shall remain unaffected and in force

IT IS ORDERED THAT:

DEFINITIONS

- 1. "The Distribution Centres" means the land defined in Schedule 1 to this order, the extent of which is shown for identification purposes coloured blue on each of the relevant plans appended to this order in Schedule 2 ("the Plans").
- 2. "The Access Roads" means the roads which provide direct access to each of the relevant Distribution Centres, the extent of which is shown for identification purposes in pink and/or orange on the Plans.

3. "Warning Notices" means notices in the form as set out in Schedule 5 to this order (and warning of the existence and general nature of this order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the order may be requested and identifying the website address www.morrisons-corporate.com/injunction at which copies of this order may be viewed and downloaded).

PERMISSION TO AMEND

4. The Claimants have permission to re-amend the claim form in order to re-amend the description of the Defendants by substituting the reference to "Sites" for "Distribution Centres" and correcting the reference to "regional distribution centres" in paragraph 3 of the details of claim.

INJUNCTION

- 5. Subject to paragraph 8 below, this order shall operate with immediate effect until varied, discharged or extended by further order.
- 6. The Defendants and each of them <u>must not</u> do any of the acts listed in paragraph 7 of this order.
- 7. The acts referred to in paragraph 6 of this order are:
 - a. entering, occupying or remaining upon any part of the Distribution Centres without the consent of the Claimants in connection with agricultural protests;
 - b. creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants, its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the Access Roads in connection with agricultural protests.
- 8. There is to be a further return date of the Application, listed for <u>29</u> January 2025 at 12pm, with a time estimate of three and a half hours at which the Court will consider whether the injunctions granted by this order shall continue for a further period and, if appropriate, give case management directions for the progression of the claim

FURTHER DIRECTIONS

- 9. The Defendants and any persons affected by this order who wish to attend the return date hearing and make representations to the Court shall provide their written representations and any evidence which is to be relied upon by them at the hearing of the return date to the Claimants' solicitors by no later than 4pm on 24 January 2025.
- 10. No acknowledgment of service, admission or defence is required by any party until further so ordered.
- 11. Costs are reserved.

COMMUNICATIONS WITH THE CLAIMANTS

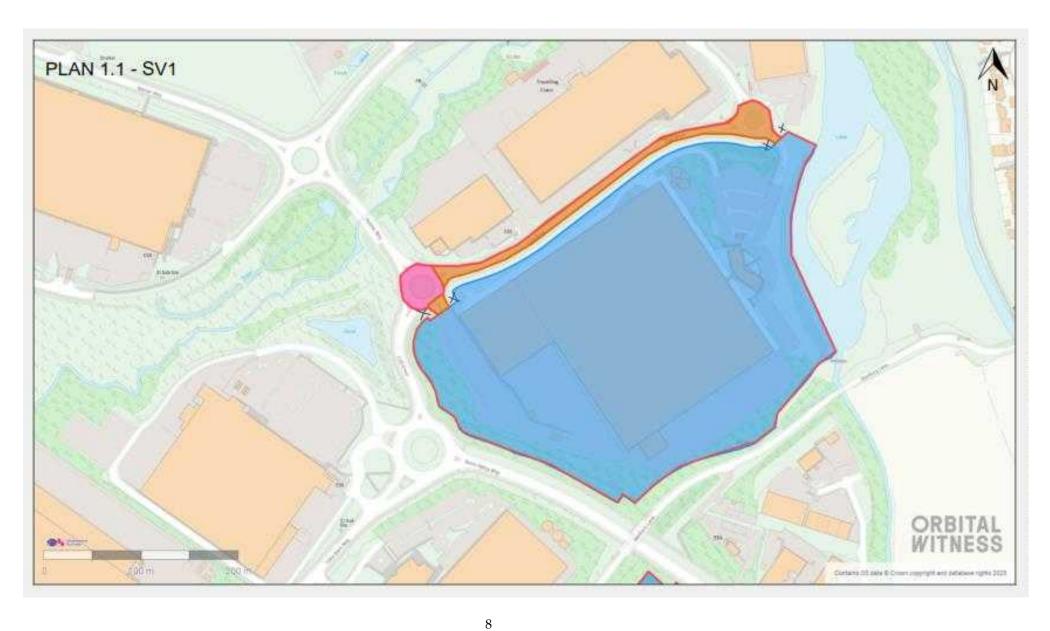
- 12. The Claimants' solicitors and their contact details are:
 - (1) Andrew Todd Eversheds Sutherland (International) LLP andrewtodd@eversheds-sutherland.com
 - (2) Alex Wright
 Eversheds Sutherland (International) LLP
 alexwright@eversheds-sutherland.com

SCHEDULE 1 - THE DISTRIBUTION CENTRES

THE DISTRIBUTION CENTRES BEING:

- (1) THE FIRST CLAIMANT'S NORTHAMPTON VALLEY RETAIL DISTRIBUTION CENTRE AT (A) COB DRIVE, SWAN VALLEY, NORTHAMPTON NN4 9BB; (B) DC2, SWAN VALLEY, NORTHAMPTON NN4 9BD; AND (C) (SV3), UPTON, NORTHAMPTON, THE EXTENT OF WHICH IS SHOWN FOR IDENTIFICATION PURPOSES COLOURED BLUE ON PLAN 1.1., 1.2, AND 1.3, APPENDED TO THIS ORDER IN SCHEDULE 2
- (2) THE SECOND CLAIMANT'S STOCKTON DICKENS RETAIL DISTRIBUTION CENTRE MALLEABLE WAY, STOCKTON-ON-TEES, TS18 2QZ, THE EXTENT OF WHICH IS SHOWN FOR IDENTIFICATION PURPOSES COLOURED BLUE ON PLAN 2 APPENDED TO THIS ORDER IN SCHEDULE 2
- (3) THE FIRST CLAIMANT'S SITTINGBOURNE RETAIL DISTRIBUTION CENTRE AT G PARK, SITTINGBOURNE ME10 2FD, THE EXTENT OF WHICH IS SHOWN FOR IDENTIFICATION PURPOSES COLOURED BLUE ON PLAN 3 APPENDED TO THIS ORDER IN SCHEDULE 2
- (4) THE FIRST AND THIRD CLAIMANTS' GADBROOK RETAIL DISTRIBUTION CENTRE AT KING ST, RUDHEATH, NORTHWICH CW9 7WA, THE EXTENT OF WHICH IS SHOWN FOR IDENTIFICATION PURPOSES COLOURED BLUE ON PLAN 4 APPENDED TO THIS ORDER IN SCHEDULE 2
- (5) THE FIRST CLAIMANT'S LATIMER PARK KETTERING RETAIL DISTRIBUTION CENTRE AT ALTENDIEZ WAY, BURTON LATIMER, KETTERING NN15 5YT, THE EXTENT OF WHICH IS SHOWN FOR IDENTIFICATION PURPOSES COLOURED BLUE ON PLAN 5 APPENDED TO THIS ORDER IN SCHEDULE 2
- (6) THE FIRST CLAIMANT'S LATIMER PARK CORBY RETAIL DISTRIBUTION CENTRE AT HALLEY ROAD, CORBY NN17 5AN, THE EXTENT OF WHICH IS SHOWN FOR IDENTIFICATION PURPOSES COLOURED BLUE ON PLAN 6 APPENDED TO THIS ORDER IN SCHEDULE 2
- (7) THE FIRST CLAIMANT'S WILLOW GREEN RETAIL DISTRIBUTION CENTRE AT (A) KINGS DR, BRIDGWATER TA6 4FG; AND (B) BRISTOL ROAD, BRIDGWATER TA6 4BU, THE EXTENT OF WHICH IS SHOWN FOR IDENTIFICATION PURPOSES COLOURED BLUE ON PLANS 7.1 AND 7.2 APPENDED TO THIS ORDER IN SCHEDULE 2
- (8) THE FIRST CLAIMANT'S WAKEFIELD RETAIL DISTRIBUTION CENTRE AT KENMORE RD, WAKEFIELD INDUSTRIAL ESTATE, WAKEFIELD WF2 0XF, THE EXTENT OF WHICH IS SHOWN FOR IDENTIFICATION PURPOSES COLOURED BLUE ON PLAN 8 APPENDED TO THIS ORDER IN SCHEDULE 2

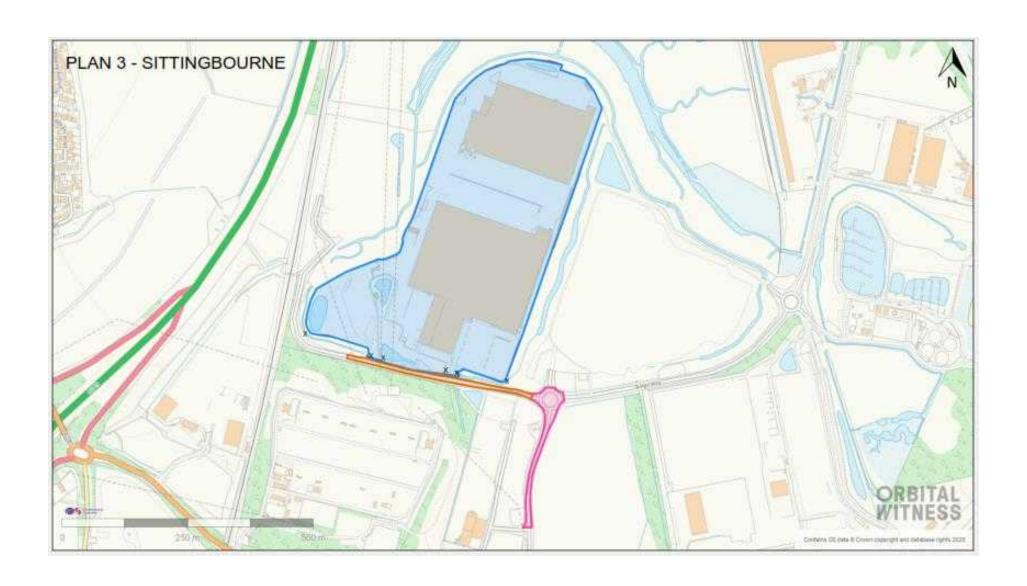
SCHEDULE 2 – PLANS TO THE DISTRIBUTION CENTRES



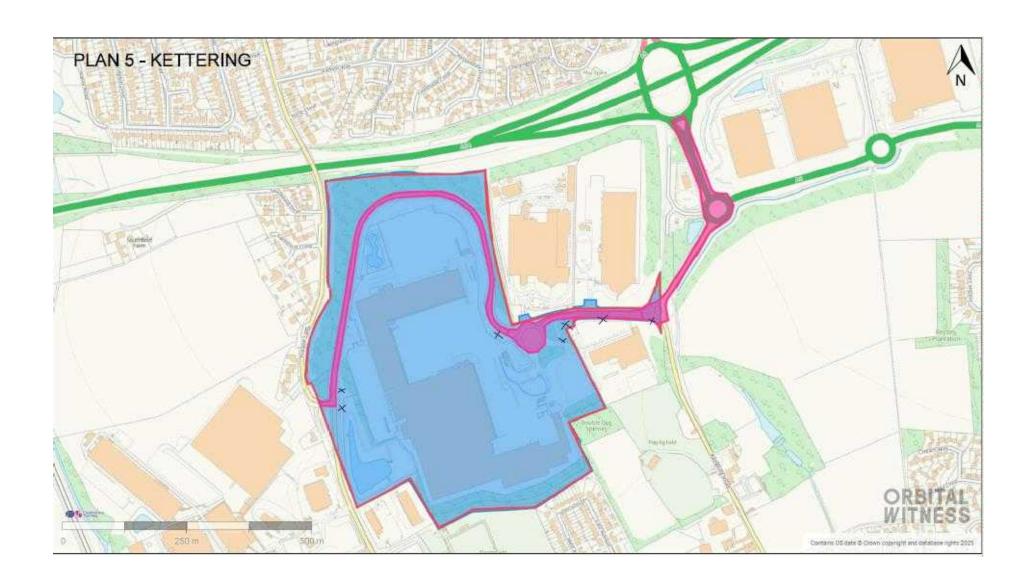


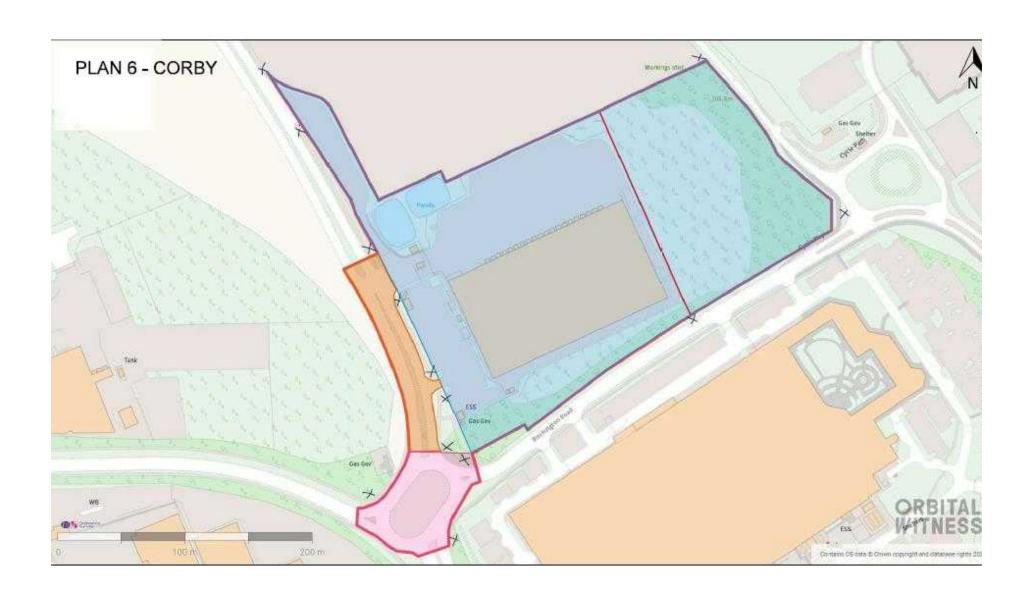


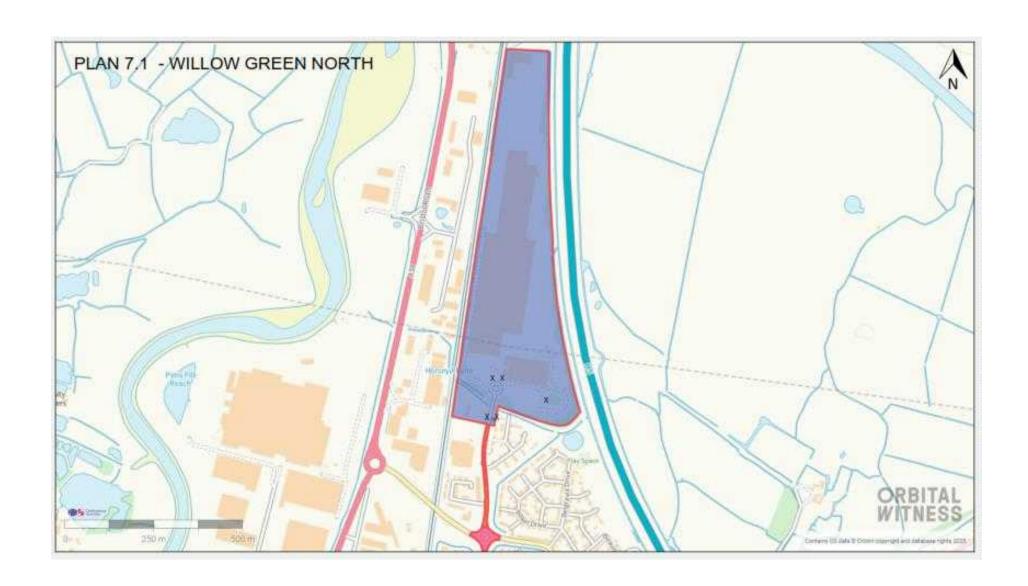




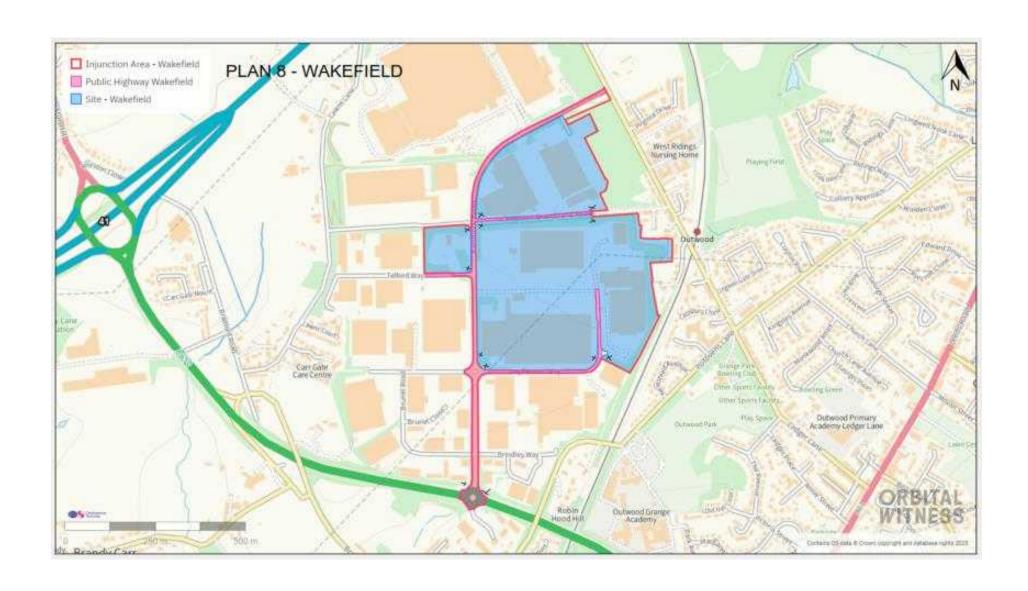












SCHEDULE 3 - UNDERTAKINGS GIVEN BY THE CLAIMANTS

- (1) The Claimants will, as soon as practicable take steps (a) to serve the Defendants with a note of the hearing dated 20 January 2025 and (b) to obtain transcript of the hearings on 16 and 20 January 2025 to supply to the clerks to Collins Rice J and Fordham J, for publication on the Courts and Tribunals Judiciary website.
- (2) The Claimants will upload any documents in the proceedings to <u>www.morrisons-</u>corporate.com/injunction.
- (3) The Claimants will use best endeavours on an ongoing basis to identify any persons falling within the category of the Defendants and consider whether it is appropriate to join them as parties.
- (4) The Claimants will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 6 of this order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 4 – EMAIL ADDRESSES

info@farmerstoaction.org

SCHEDULE 5 – WARNING NOTICE

NOTICE OF HIGH COURT ORDER DATED 21 JANUARY 2025 ("the Order")

TO:

- 1. PERSONS UNKNOWN WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1 TO THE CLAIM FORM WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS
- 2. PERSONS UNKNOWN WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWNS ON THE PLANS AT SCHEDULE 2 TO THE CLAIM FORM, WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS

("the Defendants")

FROM: WM MORRISON SUPERMARKETS LIMITED ("the First Claimant")

This notice relates to the land known as **NORTHAMPTON VALLEY RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

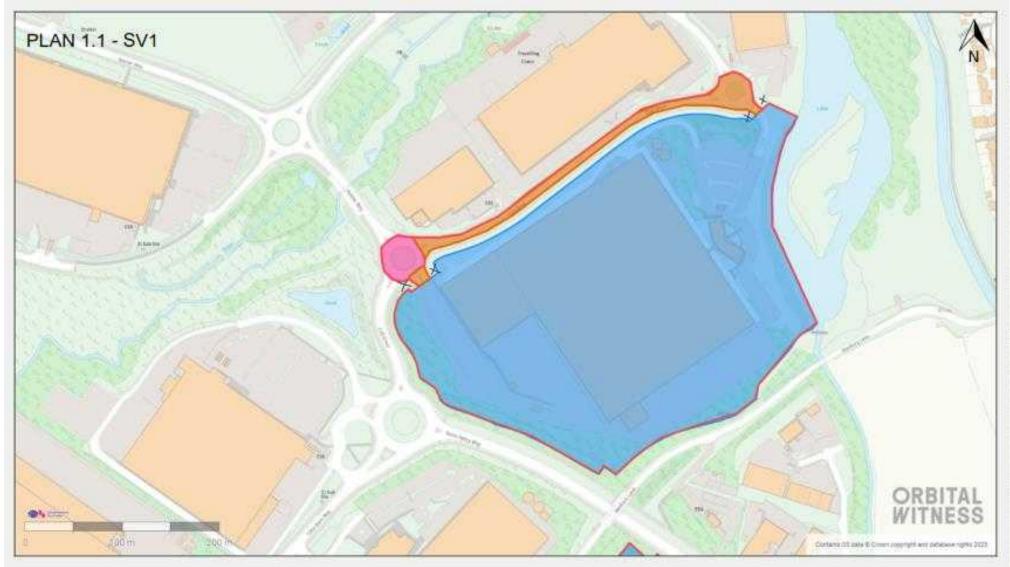
- 1. entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the First Claimant; and
- 2. creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink and orange on the Plan).

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 20 January 2025 may be viewed at: www.morrisons-corporate.com/injunction



NOTICE OF HIGH COURT ORDER DATED 21 JANUARY 2025 ("the Order")

TO:

- 1. PERSONS UNKNOWN WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1
 TO THE CLAIM FORM WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS
- 2. PERSONS UNKNOWN WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWNS ON THE PLANS AT SCHEDULE 2 TO THE CLAIM FORM, WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS

("the Defendants")

FROM: WM MORRISON SUPERMARKETS LIMITED ("the First Claimant")

This notice relates to the land known as **NORTHAMPTON VALLEY RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

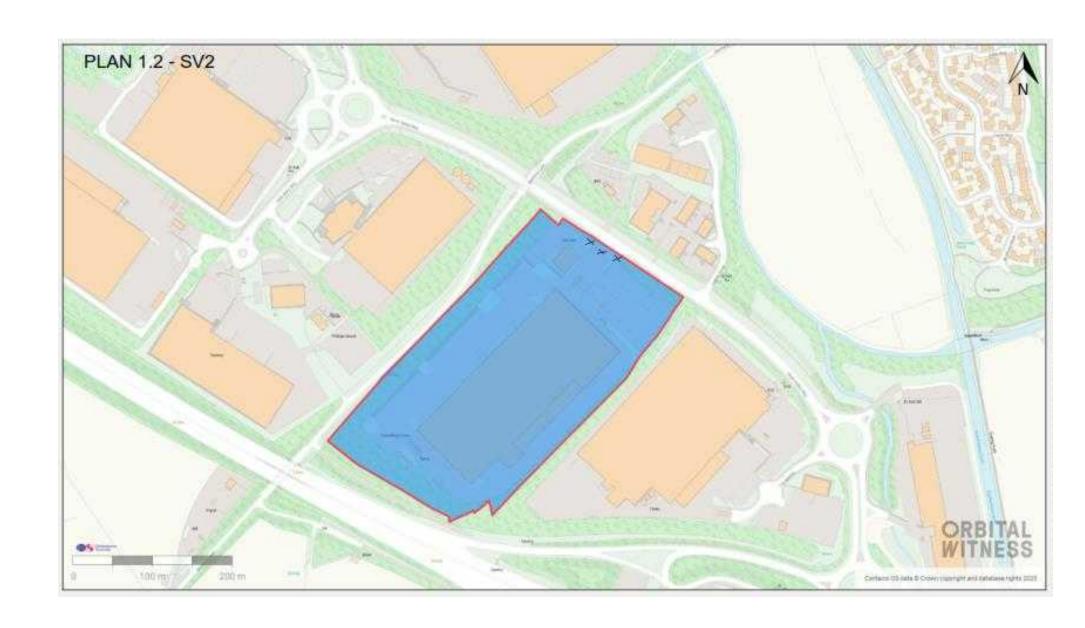
1. entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the First Claimant.

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

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NOTICE OF HIGH COURT ORDER DATED 21 JANUARY 2025 ("the Order")

TO:

- 1. PERSONS UNKNOWN WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1
 TO THE CLAIM FORM WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS
- 2. PERSONS UNKNOWN WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWNS ON THE PLANS AT SCHEDULE 2 TO THE CLAIM FORM, WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS

("the Defendants")

FROM: WM MORRISON SUPERMARKETS LIMITED ("the First Claimant")

This notice relates to the land known as **NORTHAMPTON VALLEY RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

- 1. entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the First Claimant; and
- 2. creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink and orange on the Plan).

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 20 January 2025 may be viewed at: www.morrisons-corporate.com/injunction



NOTICE OF HIGH COURT ORDER DATED 21 JANUARY 2025 ("the Order")

TO:

- 1. PERSONS UNKNOWN WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1 TO THE CLAIM FORM WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS
- 2. PERSONS UNKNOWN WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWNS ON THE PLANS AT SCHEDULE 2 TO THE CLAIM FORM, WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS

("the Defendants")

FROM: SAFEWAY STORES LIMITED

("the Second Claimant")

This notice relates to the land known as **STOCKTON DICKENS RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

- 1. entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the Second Claimant; and
- creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink on the Plan).

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 20 January 2025 may be viewed at: www.morrisons-corporate.com/injunction



NOTICE OF HIGH COURT ORDER DATED 21 JANUARY 2025 ("the Order")

TO:

- 1. PERSONS UNKNOWN (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM) WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1 TO THE CLAIM FORM WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS
- 2. PERSONS UNKNOWN (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM) WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWNS ON THE PLANS AT SCHEDULE 2 TO THE CLAIM FORM, WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS

("the Defendants")

FROM: WM MORRISON SUPERMARKETS LIMITED ("the First Claimant")

This notice relates to the land known as **SITTINGBOURNE RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

- 1. entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the First Claimant; and
- 2. creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink and orange on the Plan).

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 20 January 2025 may be viewed at: www.morrisons-corporate.com/injunction



NOTICE OF HIGH COURT ORDER DATED 21 JANUARY 2025 ("the Order")

TO:

- 1. PERSONS UNKNOWN (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM) WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1 TO THE CLAIM FORM WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS
- 2. PERSONS UNKNOWN (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM) WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWNS ON THE PLANS AT SCHEDULE 2 TO THE CLAIM FORM, WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS

FROM: WM MORRISON SUPERMARKETS LIMITED AND WM MORRISON PRODUCE LIMITED

("the First and Third Claimants")

This notice relates to the land known as **GADBROOK RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

- 1. entering or remaining upon any part of the land shown coloured blue on the Plan without the consent of the First and Third Claimants; and
- 2. creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink on the Plan).

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 20 January 2025 may be viewed at: www.morrisons-corporate.com/injunction



NOTICE OF HIGH COURT ORDER DATED 21 JANUARY 2025 ("the Order")

TO:

- 1. PERSONS UNKNOWN (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM) WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1 TO THE CLAIM FORM WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS
- 2. PERSONS UNKNOWN (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM) WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWNS ON THE PLANS AT SCHEDULE 2 TO THE CLAIM FORM, WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS

("the Defendants")

FROM: WM MORRISON SUPERMARKETS LIMITED ("the First Claimant")

This notice relates to the land known as **LATIMER PARK KETTERING RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

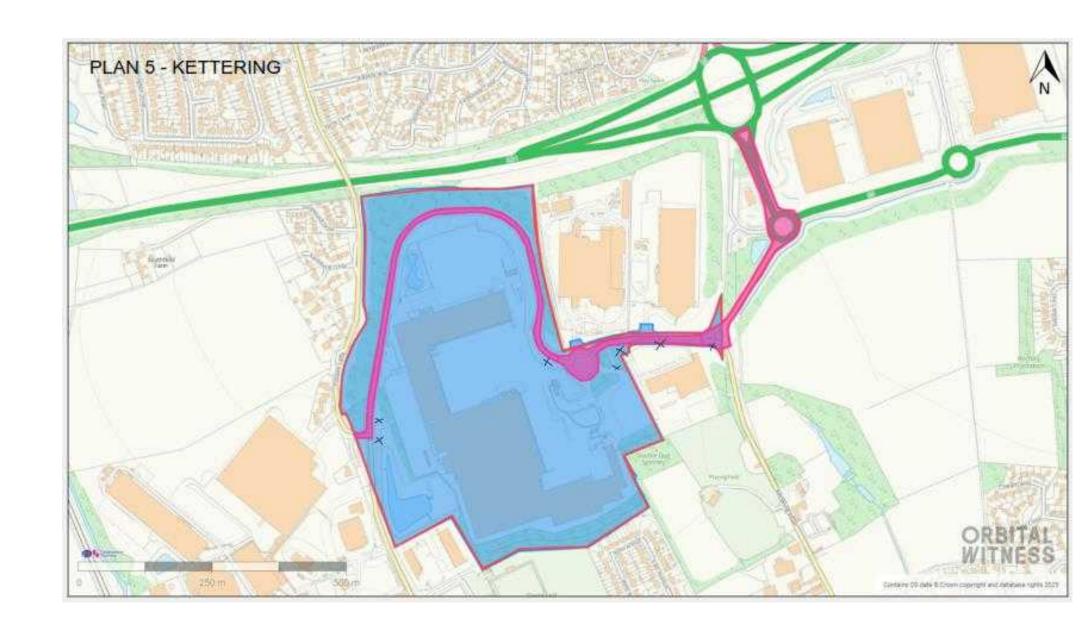
- 1. entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the First Claimant; and
- 2. creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink on the Plan).

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 20 January 2025 may be viewed at: www.morrisons-corporate.com/injunction



NOTICE OF HIGH COURT ORDER DATED 21 JANUARY 2025 ("the Order")

TO:

- 1. PERSONS UNKNOWN (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM) WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1 TO THE CLAIM FORM WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS
- 2. PERSONS UNKNOWN (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM) WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWNS ON THE PLANS AT SCHEDULE 2 TO THE CLAIM FORM, WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS

("the Defendants")

FROM: WM MORRISON SUPERMARKETS LIMITED ("the First Claimant")

This notice relates to the land known as **LATIMER PARK CORBY RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

- 1. entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the First Claimant; and
- 2. creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink and orange on the Plan).

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 20 January 2025 may be viewed at: www.morrisons-corporate.com/injunction



NOTICE OF HIGH COURT ORDER DATED 21 JANUARY 2025 ("the Order")

TO:

- 1. PERSONS UNKNOWN (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM) WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1 TO THE CLAIM FORM WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS
- 2. PERSONS UNKNOWN (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM) WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWNS ON THE PLANS AT SCHEDULE 2 TO THE CLAIM FORM, WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS

("the Defendants")

FROM: WM MORRISON SUPERMARKETS LIMITED ("the First Claimant")

This notice relates to the land known as **WILLOW GREEN RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

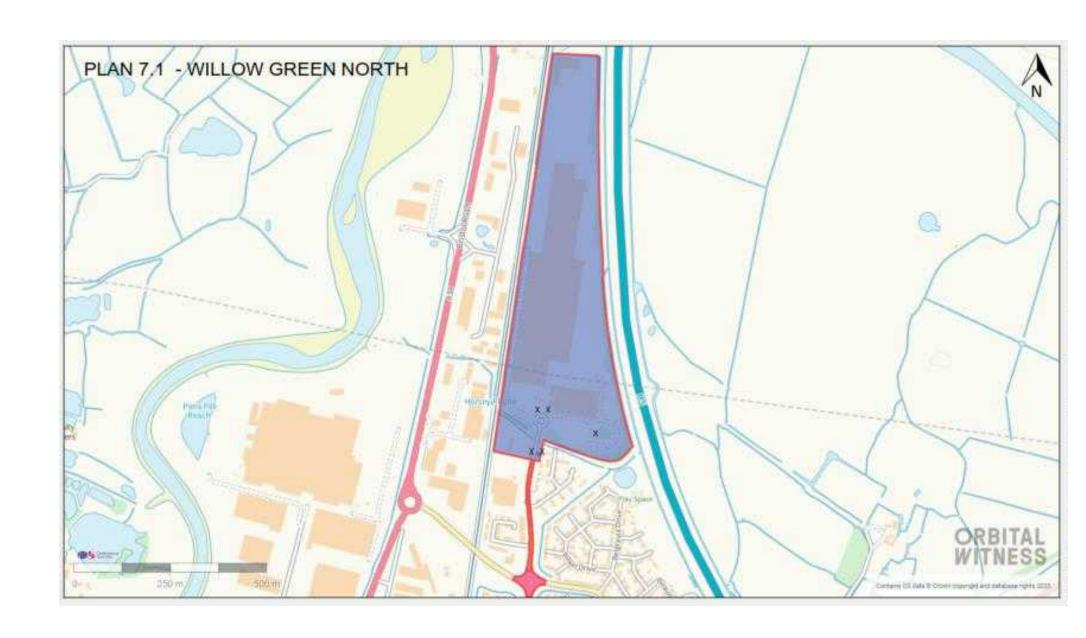
- 1. entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the First Claimant; and
- 2. creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink on the Plan).

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 20 January 2025 may be viewed at: www.morrisons-corporate.com/injunction



NOTICE OF HIGH COURT ORDER DATED 21 JANUARY 2025 ("the Order")

TO:

- 1. PERSONS UNKNOWN (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM) WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1 TO THE CLAIM FORM WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS
- 2. PERSONS UNKNOWN (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM) WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWNS ON THE PLANS AT SCHEDULE 2 TO THE CLAIM FORM, WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS

("the Defendants")

FROM: WM MORRISON SUPERMARKETS LIMITED ("the First Claimant")

This notice relates to the land known as **WILLOW GREEN RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

- 1. entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the First Claimant; and
- 2. creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink on the Plan).

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 20 January 2025 may be viewed at: www.morrisons-corporate.com/injunction



NOTICE OF HIGH COURT ORDER DATED 21 JANUARY 2025 ("the Order")

TO:

- 1. PERSONS UNKNOWN (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM) WHO ENTER AND REMAIN UPON ANY OF THE DISTRIBUTION CENTRES WHICH ARE DEFINED IN SCHEDULE 1 TO THE CLAIM FORM WITHOUT THE CONSENT OF THE CLAIMANTS IN CONNECTION WITH AGRICULTURAL PROTESTS
- 2. PERSONS UNKNOWN (AS MORE PARTICULARLY DESCRIBED IN SCHEDULE 1 TO THE CLAIM FORM) WHO CREATE OR CAUSE BLOCKADES AND OTHER OBSTRUCTIONS TO THE ACCESS ROADS TO THE SAID DISTRIBUTION CENTRES, WHICH ARE SHOWNS ON THE PLANS AT SCHEDULE 2 TO THE CLAIM FORM, WITH OR WITHOUT VEHICLES, INCLUDING TRACTORS OR OTHERWISE, IN CONNECTION WITH AGRICULTURAL PROTESTS

("the Defendants")

FROM: WM MORRISON SUPERMARKETS LIMITED ("the First Claimant")

This notice relates to the land known as **WAKEFIELD RETAIL DISTRIBUTION CENTRE** which is shown coloured blue on the Plan below (the "**Plan**").

The Order prohibits:

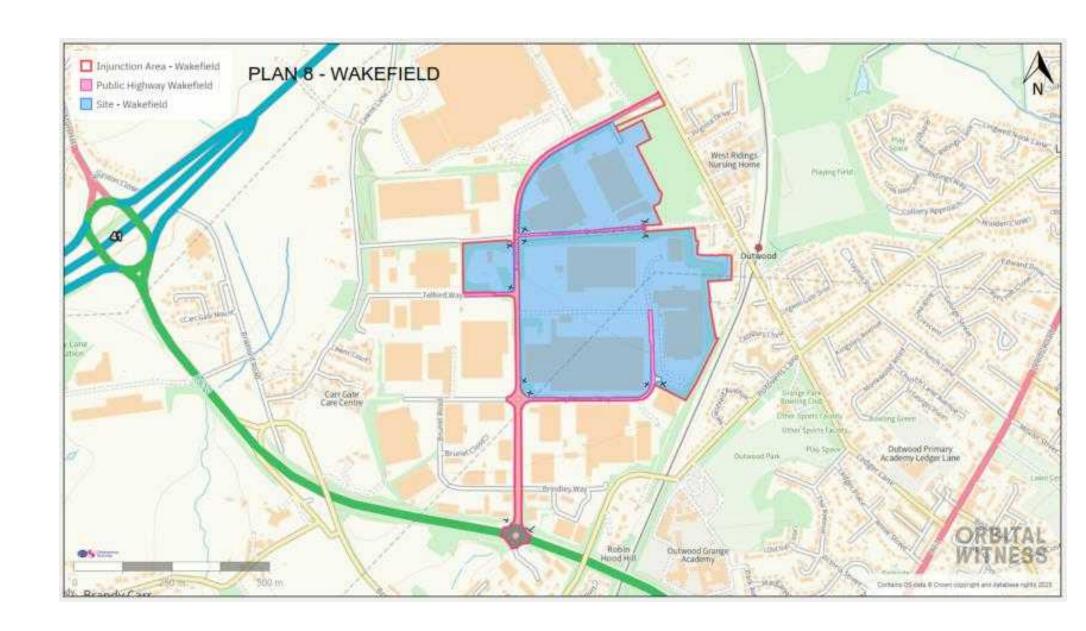
- 1. entering, occupying or remaining upon any part of the land shown coloured blue on the Plan without the consent of the First Claimant; and
- creating or causing blockades, obstructions of traffic and/or otherwise impeding, preventing or interfering with the passage by the Claimants its agents, servants, employees, licensees, invitees to, from, with or without vehicles, including tractors or other agricultural vehicles and equipment, over and across the said access roads (shown coloured pink on the Plan).

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 20 January 2025 may be viewed at: www.morrisons-corporate.com/injunction



From: Todd, Andrew

Sent: 20 January 2025 11:41 **To:** 'info@farmerstoaction.org'

Subject: Morrisons v Persons Unknown - Return Day Hearing 20/01/2025 at 2pm before Mr

Justice Fordham

Attachments: WM Supermarkets v PU. Cs Skeleton Argument for Hearing. 20 Jan 2025.

CLEAN.docx; WM Supermarkets v PU. Cs Skeleton Argument for Hearing. 20 Jan 2025. TRACKED.docx; WM Morrisons Supermarkets Limited and ors. Draft order. 20125.docx; Note of Injunction Hearing (236592507.4)[81].pdf; Second Witness

Statement of Andrew Todd 20.01.25(236673777.1).pdf

Please see the attached (i) skeleton argument with appendices and (ii) witness statement of Andrew Todd in advance of the hearing listed today at 2 pm before Mr Justice Fordham

The exhibit to the witness statement will follow by separate email.

Andrew Todd

Andrew Todd| Partner | Real Estate Dispute Resolution | Eversheds Sutherland

T: + 44 (0)1132 004 760 M: + 44 (0)7341 506 205

www.eversheds-sutherland.com

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From: Wright, Alexander <alexwright@eversheds-sutherland.com>

Sent: 20 January 2025 12:03 **To:** info@farmerstoaction.org

Cc: Todd, Andrew < Andrew Todd@eversheds-sutherland.com >

Subject: FW: Morrisons v Persons Unknown - Return Day Hearing 20/01/2025 at 2pm before Mr Justice Fordham

I'm using Mimecast to share large files with you. Please see the attached instructions.

Further to the below email, please see attached a link from which the exhibit to the Second Witness Statement of Andrew Todd (Exhibit AJT4) can be downloaded.

Regards

Alex Wright | Principal Associate | Real Estate Dispute Resolution | Eversheds Sutherland

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Eversheds Sutherland

Helping our clients, our people and our communities to thrive

Rylatt, Alisha

From: Todd, Andrew

Sent: 20 January 2025 13:06 **To:** 'info@farmerstoaction.org'

Subject: RE: Morrisons v Persons Unknown - Return Day Hearing 20/01/2025 at 2pm before

Mr Justice Fordham

Attachments: KB-2025-000136 - Andrew Todd Third Witness Statement Dated 20 January 2025 -

linked to #236676810(236678937.1).pdf

Please see attached Third Witness Statement

Andrew Todd

Andrew Todd | Partner | Real Estate Dispute Resolution | Eversheds Sutherland

T: + 44 (0)1132 004 760 M: + 44 (0)7341 506 205

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-----Original Message-----

From: Todd, Andrew < Andrew Todd@eversheds-sutherland.com>

Sent: 22 January 2025 16:56 To: info@farmerstoaction.org

Cc: Wright, Alexander < AlexWright@eversheds-sutherland.com>

Subject: RE: URGENT INFORMATION - Mr Justice Fordham - Court 37 - RE: Claim No. KB-2025-000136

Please see the attached Note of the Hearing of 20 January 2025.

Andrew Todd

Andrew Todd | Partner | Real Estate Dispute Resolution | Eversheds Sutherland

T: +44 (0)1132 004 760 M: +44 (0)7341 506 205

www.eversheds-sutherland.com

Eversheds Sutherland Client Commitment. Innovative Solutions. Global Service. From: Todd, Andrew

Sent: 27 January 2025 10:44

To: 'info@farmerstoaction.org' < <u>info@farmerstoaction.org</u>> **Cc:** Wright, Alexander < <u>AlexWright@eversheds-sutherland.com</u>>

Subject: RE: Morrisons v Persons Unknown

Please see the attached

Andrew Todd

Andrew Todd| Partner | Real Estate Dispute Resolution | Eversheds Sutherland

T: + 44 (0)1132 004 760 M: + 44 (0)7341 506 205

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-----Original Message-----From: Todd, Andrew

Sent: 20 January 2025 18:37 To: info@farmerstoaction.org

Cc: Wright, Alexander <AlexWright@eversheds-sutherland.com>

Subject: RE: URGENT INFORMATION - Mr Justice Fordham - Court 37 - RE: Claim No. KB-2025-000136

Please see attached Order of The Honourable Mr Justice Fordham

You will note the court has listed a return hearing for 28 January 2025 at 12 Noon

Andrew Todd

Andrew Todd | Partner | Real Estate Dispute Resolution | Eversheds Sutherland

T: +44 (0)1132 004 760 M: +44 (0)7341 506 205

www.eversheds-sutherland.com

Eversheds Sutherland Client Commitment. Innovative Solutions. Global Service. From: Todd, Andrew

Sent: 21 January 2025 19:33 **To:** info@farmerstoaction.org

Cc: Wright, Alexander

Subject: RE: URGENT INFORMATION - Mr Justice Fordham - Court 37 - RE: Claim No.

KB-2025-000136

Attachments: King's Bench Associate's-Order.pdf

Please see attached sealed Order

Andrew Todd

Andrew Todd | Partner | Real Estate Dispute Resolution | Eversheds Sutherland

T: +44 (0)1132 004 760 M: +44 (0)7341 506 205

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From: Todd, Andrew

Sent: 27 January 2025 11:31 **To:** info@farmerstoaction.org

Cc: Wright, Alexander < AlexWright@eversheds-sutherland.com >

Subject: RE: Morrisons v Persons Unknown

Please see attached amended Order received by the Court

Please note that paragraph 8 now reads

8. There is to be a further return date of the Application, listed for 29 January 2025 at 12pm, with a time estimate of three and a half hours at which the Court will consider whether the injunctions granted by this order shall continue for a further period and, if appropriate, give case management directions for the progression of the claim

This means the return day hearing originally listed for 12 Noon on 28 January 2025 will now take place at 12 noon on 29 January 2025.

Yours faithfully

Andrew Todd

Andrew Todd | Partner | Real Estate Dispute Resolution | Eversheds Sutherland

T: + 44 (0)1132 004 760 M: + 44 (0)7341 506 205

www.eversheds-sutherland.com

Eversheds Sutherland

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----Original Message-----

From: Farmers To Action <info@farmerstoaction.org>

Sent: 20 January 2025 09:00

To: Todd, Andrew <AndrewTodd@eversheds-sutherland.com>; KBEnquiries@justice.gov.uk Subject: URGENT INFORMATION - Mr Justice Fordham - Court 37 - RE: Claim No. KB-2025-000136

Importance: High

Urgent FAO: Mr Justice Fordham - Court 37

RE: Claim No. KB-2025-000136

Dear Sir or Madam,

We received the extensive documentation at the end of the day Friday. It would be greatly appreciated if can we have some time to read to determine if we need to seek counsel.

Many thanks in advance FTA

----Original Message-----From: Todd, Andrew

Sent: 20 January 2025 15:13

To: 'info@farmerstoaction.org' <info@farmerstoaction.org>

Cc: 'Evie Barden' <EBarden@landmarkchambers.co.uk>; 'Myriam Stacey KC' <MStacey@landmarkchambers.co.uk>; Wright, Alexander <AlexWright@eversheds-sutherland.com>; 'Turner, Jessica' <Jessica.Turner1@justice.gov.uk>

Subject: RE: URGENT INFORMATION - Mr Justice Fordham - Court 37 - RE: Claim No. KB-2025-000136

Dear Farmers to Action

Further to your email below (timed 0900), the judge hearing this case, Mr Justice Fordham, would like to afford you the opportunity to promptly clarify (he suggested within 10 minutes of this email) the following:

- (i) what you mean in your below email by "more time" i.e. how much time do you require;
- (ii) what is your position in response to the Claimants' proposal that the matter could be deferred for 7 days; and
- (iii) if you do require a deferral whether you would be agreeable to the case being heard on Friday, 24 January 2025?

Please respond to those points within 10 minutes of this email as the judge is in the process of deliberating.

Andrew Todd

Andrew Todd | Partner | Real Estate Dispute Resolution | Eversheds Sutherland

T: +44 (0)1132 004 760 M: +44 (0)7341 506 205

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Eversheds Sutherland Client Commitment. Innovative Solutions. Global Service. -----Original Message-----

From: Todd, Andrew < Andrew Todd@eversheds-sutherland.com>

Sent: 20 January 2025 15:37 To: info@farmerstoaction.org

Cc: Evie Barden <EBarden@landmarkchambers.co.uk>; Myriam Stacey KC <MStacey@landmarkchambers.co.uk>; Wright, Alexander <AlexWright@eversheds-sutherland.com>; Turner, Jessica <Jessica.Turner1@justice.gov.uk>

Subject: RE: URGENT INFORMATION - Mr Justice Fordham - Court 37 - RE: Claim No. KB-2025-000136

The Judge specifically asked us to chase you if there was no response to the below

Please respond immediately if you intend to do so

Andrew Todd

Andrew Todd | Partner | Real Estate Dispute Resolution | Eversheds Sutherland

T: +44 (0)1132 004 760 M: +44 (0)7341 506 205

www.eversheds-sutherland.com

Eversheds Sutherland Client Commitment. Innovative Solutions. Global Service.

----Original Message----From: Todd, Andrew Sent: 20 January 2025 15:13

To: 'info@farmerstoaction.org' <info@farmerstoaction.org>

Cc: 'Evie Barden' <EBarden@landmarkchambers.co.uk>; 'Myriam Stacey KC' <MStacey@landmarkchambers.co.uk>; Wright, Alexander <AlexWright@eversheds-sutherland.com>; 'Turner, Jessica' <Jessica.Turner1@justice.gov.uk> Subject: RE: URGENT INFORMATION - Mr Justice Fordham - Court 37 - RE: Claim No. KB-2025-000136

Dear Farmers to Action

Further to your email below (timed 0900), the judge hearing this case, Mr Justice Fordham, would like to afford you the opportunity to promptly clarify (he suggested within 10 minutes of this email) the following:

- (i) what you mean in your below email by "more time" i.e. how much time do you require;
- (ii) what is your position in response to the Claimants' proposal that the matter could be deferred for 7 days; and (iii) if you do require a deferral whether you would be agreeable to the case being heard on Friday, 24 January 2025?

Please respond to those points within 10 minutes of this email as the judge is in the process of deliberating.

Andrew Todd

From: Chris Fellows <chris@agriwebmedia.co.uk>

Sent: 24 January 2025 12:25

To: Todd, Andrew < Andrew Todd@eversheds-sutherland.com >

Cc: Clive Bailye <clive@agriwebmedia.co.uk>

Subject: RE: Notification of High Court Injunction and Return Hearing on 20 January 2025 at 2pm (from

The Farming Forum)

Good Afternoon Mr Todd,

I hope this email finds you well.

I am writing to address the civil injunction and raise some key concerns as a director of Agri Web Media Ltd. For context, Agri Web Media Ltd is an advertising sales company that operates platforms including *The Farming Forum*, *Direct Driller Magazine*, and *Tech Farmer Magazine*.

Having reviewed some of the documents available, I want to clarify that Agri Web Media has had no involvement in the organisation or execution of the protest at the Morrisons distribution centre. Furthermore, we have no commercial relationship with Farmers To Action.

As such, we are uncertain why our company platform was mentioned in the initial claim and subsequent arguments. While we have supported other events related to changes in government Inheritance Tax (IHT) rules, this connection is entirely unrelated to the matters at hand. We do not believe that such subject overlap justifies our inclusion in court documentation concerning the blockage of distribution centres.

Additionally, I would like to address the use of the terms "advertising," "advertise," and "advertisement" within the documents. These terms could suggest that we were paid to promote specific activities, which is not the case. While we do carry paid advertising for corporate clients in the agricultural supply chain - serving approximately one million digital adverts daily - I can confirm that no advertising space was supplied for free or connected to the protest.

We are concerned that the inclusion of The Farming Forum (part of Agri Web Media Ltd) in these documents has the potential to cause reputational damage. As a company operating within the agricultural sector, with clients including Asda, Sainsbury's, and Waitrose, we take our reputation very seriously. It's worth noting that Morrisons, are also a potential client, given their existing advertising spend within agricultural media.

Therefore, we respectfully request that in any future documentation submitted to the court, the potential for reputational damage to our business is carefully considered. We kindly ask that any references to Agri Web Media Ltd or The Farming Forum are reviewed for accuracy, and appropriate wording is used to avoid any undue harm to our standing in the industry.

Thank you for your attention to this matter. Please feel free to reach out if you require further clarification.

Kind regards,

Chris Fellows Director, Agri Web Media Ltd

E: chris@agriwebmedia.co.uk

T: 01543 396 770 M: 075 833 255 12



From: Todd, Andrew < AndrewTodd@eversheds-sutherland.com >

Sent: 22 January 2025 14:31

To: Chris Fellows < chris@agriwebmedia.co.uk>

Subject: RE: Notification of High Court Injunction and Return Hearing on 20 January 2025 at 2pm (from The Farming

Forum)

Thank you Mr Fellows

We note there is coverage on The Farming Forum confirming knowledge of the Injunction Order made on 16 January 2025.

We would be grateful if you would post on the relevant chat thread that all documents relating to the Injunction (including the Revised Injunction Order of Mr Justice Fordham dated 21 January 2025) are available at an open access site at https://www.morrisons-corporate.com/about-us/injunction/

Yours sincerely

Andrew Todd

Andrew Todd | Partner | Real Estate Dispute Resolution | Eversheds Sutherland

T: +44 (0)1132 004 760 M: +44 (0)7341 506 205

www.eversheds-sutherland.com

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Client Commitment. Innovative Solutions. Global Service.

From: Chris Fellows <chris@agriwebmedia.co.uk>

Sent: 20 January 2025 13:47

To: Todd, Andrew < Andrew Todd@eversheds-sutherland.com >

Subject: RE: Notification of High Court Injunction and Return Hearing on 20 January 2025 at 2pm (from

The Farming Forum)

Good Afternoon,

I have only just seen your post – as it was a generic company email. I am one of the owners and happy to help regarding posting up information.

Please do send over details.

Kind regards,

Chris Fellows

E: chris@agriwebmedia.co.uk

T: 01543 396 770 M: 075 833 255 12



From: Eversheds Sutherland (International) LLP < no-reply@thefarmingforum.co.uk >

Sent: 17 January 2025 19:15

To: TFF Info < info@thefarmingforum.co.uk >

Subject: Notification of High Court Injunction and Return Hearing on 20 January 2025 at 2pm (from The Farming

Forum)

The Farming Forum

The following message has been sent from Eversheds Sutherland (International) LLP <andrewtodd@eversheds-sutherland.com> (IP: 208.127.55.212) via the contact form at The Farming Forum.

Notification of High Court Injunction and Return Hearing on 20 January 2025 at 2pm

We act for Morrisons Supermarkets and we request that you post a link to our client's website on your forum at the earliest opportunity, by way of notification of the terms of an Injunction Order made by The Honourable Mrs Justice Collins Rice on 16 January 2025 against Persons Unknown.

Details of the relevant website will be provided upon receipt of an email to andrewtodd@eversheds-sutherland.com – a previous attempt to provide it using this function having been rejected.

A copy of the Injunction Order and copies of documents which relate to it may be viewed at the above website.

Please note that a return hearing has been listed to be heard at the High Court, Kings Bench Division on 20 January 2025 at 2pm before Mr Justice Fordham. The Defendants and any person affected by the Injunction Order is entitled to attend and make representations as to the matters before the court at that hearing.

The relevant address is King's Bench Division, The Royal Courts of Justice, Strand, London, WC2A 2L

From: Farmers To Action <info@farmerstoaction.org>

Sent: 27 January 2025 09:33

To: Todd, Andrew

Cc: Turner, Jessica; Evie Barden; Myriam Stacey KC; Wright, Alexander

Subject: Re: URGENT INFORMATION - Mr Justice Fordham - Court 37 - RE: Claim No.

KB-2025-000136

Urgent FAO: Mr Justice Fordham - Court 37

RE: Claim No. KB-2025-000136

Dear Sir or Madam,

Thank you for the time to read the documentation. We have had time to consider our position and at present we no longer wish to proceed.

Yours sincerely The FTA

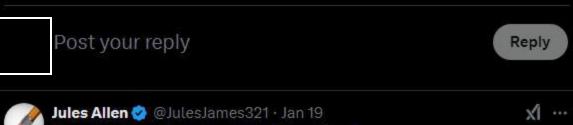


Farmers protested outside Tesco's distribution centre in Reading today



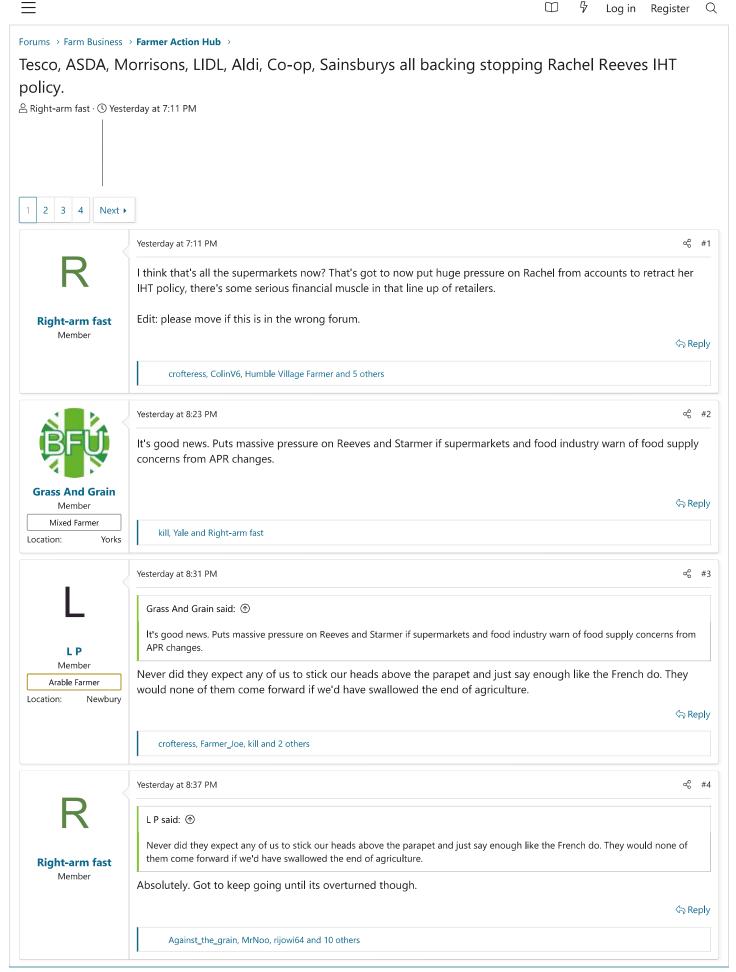
7:52 PM · Jan 19, 2025 · 18.3K Views













Member

Mixed Farmer Location:

Yorks

Yesterday at 8:42 PM

∝° #5

L P said: ①

Never did they expect any of us to stick our heads above the parapet and just say enough like the French do. They would none of them come forward if we'd have swallowed the end of agriculture.

I totally agree LP.

NFU are sort of claiming a "win", and I'm sure they have been talking to retailers behind closed doors since November, and reputedly retailers have been talking to The Government behind closed doors, but it's since the farmers got grumpy and visited distribution centres and supermarket car parks that the supermarkets have made their views public. It's not a coincidence is it.

Reeves now looking very isolated. Labour have repeatedly said they simply need the cash to pay for public services, and it's just tough you farmers will just have to pay your way.

Different now though. They've got industry experts telling them continuity of food supply is at risks and food security is at risk. Apparently Rachel was an Economist, but she can't claim she knows more about food chains than Tesco.

She's gotten backed into a corner, and looks very irresponsible if she ignores warnings from those who understand the food industry.

⇔ Reply

Ffermer Bach, AndersonAgri, ColinV6 and 9 others

Charles.

Member

Arable Farmer

Yesterday at 8:48 PM

Grass And Grain said: ①

I totally agree LP.

NFU are sort of claiming a "win", and I'm sure they have been talking to retailers behind closed doors since November, and reputedly retailers have been talking to The Government behind closed doors, but it's since the farmers got grumpy and visited

Click to expand...

Well if they are backing farmers rather than a PR stunt then I'll be convinced more if the supermarkets tell AIC to accept UK non-farm assured grain that already surpasses negligent imported grain. Also if supermarkets now refuse to buy immoral and illegal coercion into UK farm assured vegetables, fruit, milk, eggs, meat, cereals etc and instead morally and legally allow farmer the choice to join an assurance scheme and demand UK non-farm assured food then my attitude to supermarkets will definitely change and it's no PR stunt to pull punters into their stores.

Brilliant blocking food distribution centres as it obviously has made a difference with court injunction. Strategies need to be employed blocking distribution centres covertly or strategically such Morrisons etc al can't prosecute farmers. This is a serious opportunity for supermarkets to show their full backing to British farmers by rejecting UK farm assured food and demanding UK non-farm assured food to put criminal scumbags Sheasby and Mosely and co on the dole. Failure for supermarkets to impose this agenda against UK farm assured food indicates I'm not convinced it's not a PR stunt.

Show less

Last edited: Yesterday at 8:55 PM

⟨⇒ Reply

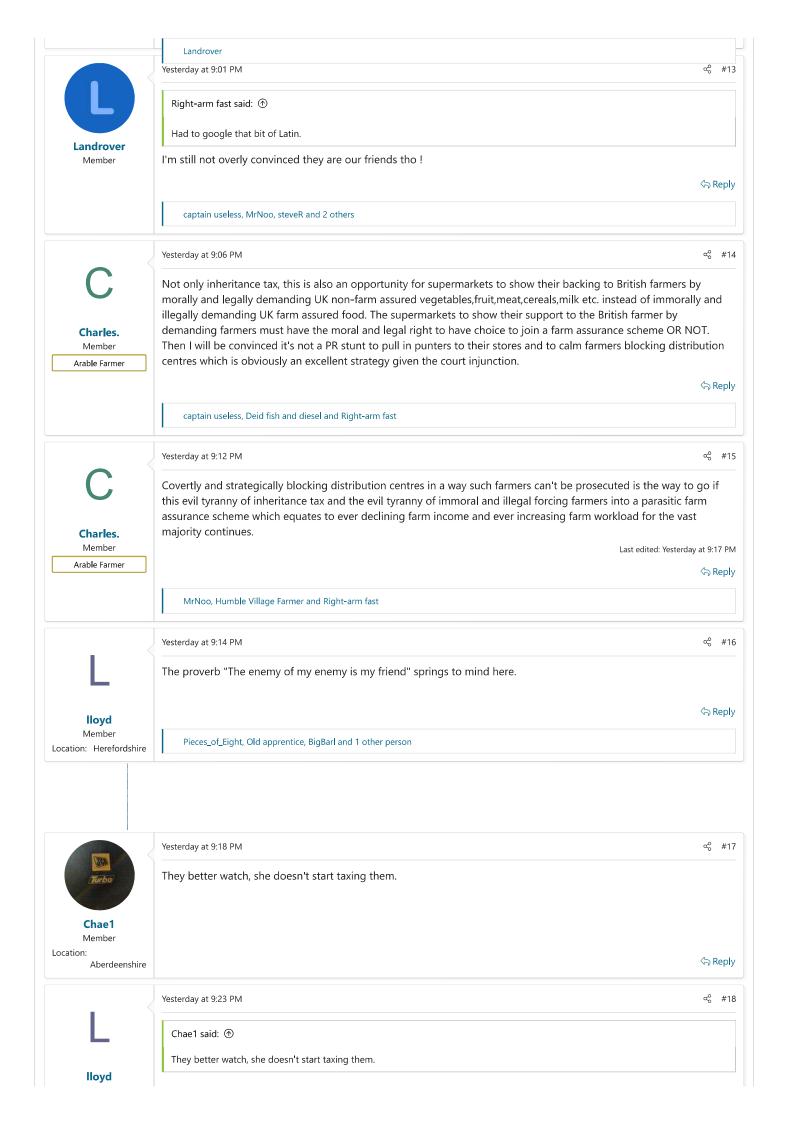
Wheatland, tullah and Green grower



Yesterday at 8:49 PM



Talk about gullible, they only got on your side when you started parking outside the supermarkets.







From manchestereveningnews.co.uk

Q 20

175

O 32

III 12K

1

1



Fuck your injunction I will at 1 of your depots. #boycottmorrisons

11:22 PM · Jan 20, 2025 · 42 Views



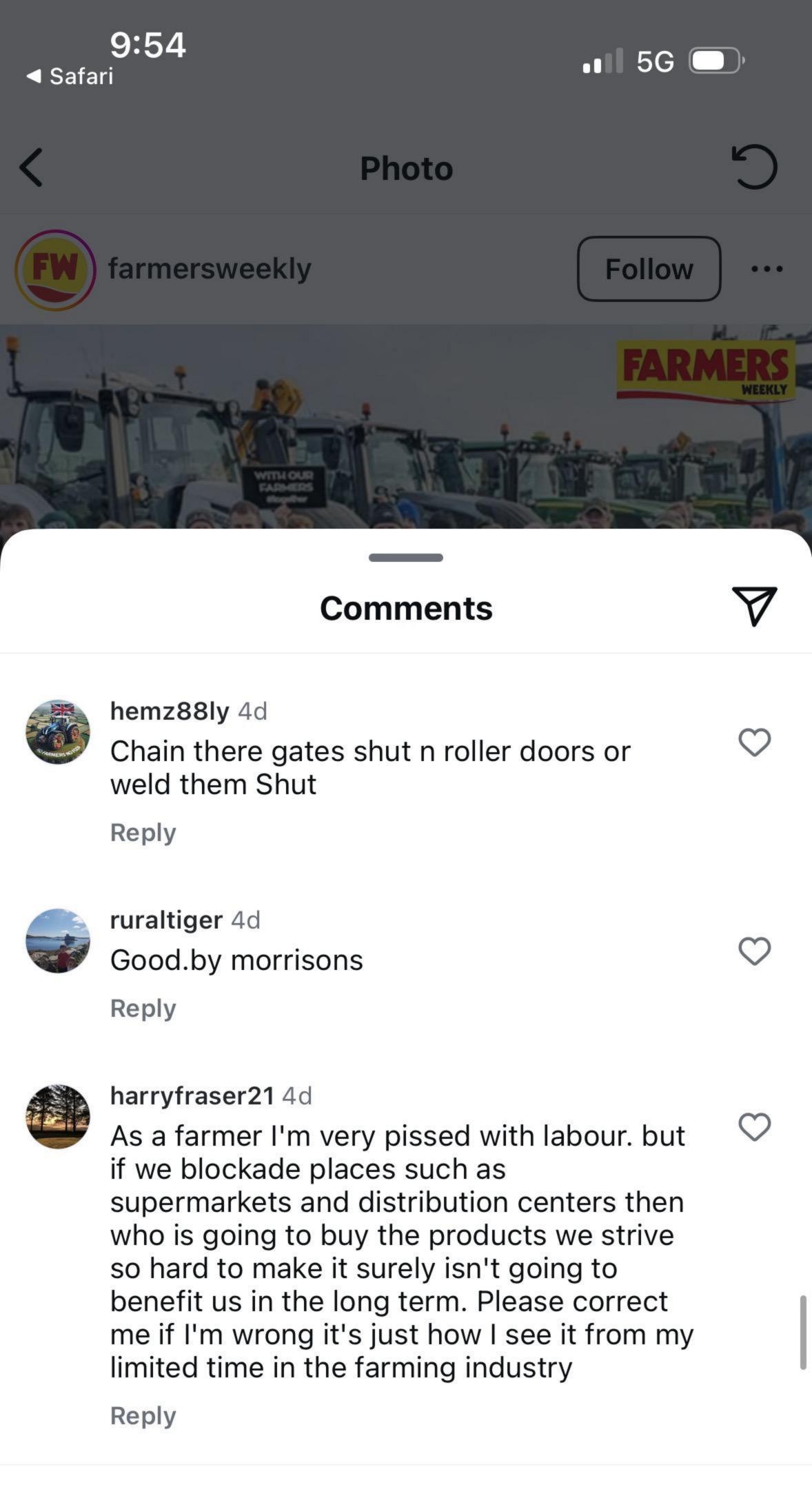














349 comments





jackludwell

If we all go to Morrisons they can't lock all of us up and then they won't have any food anyways so sounds like a them problem 😂









Jimbo

Then farmers need to take the drastic action of stopping the supplies of food going to Morrisons

Reply 3d





cold8389

Boycott Morrisons (9)



3d Reply





Chapster5

Morrisons the snakes.



349 comments

X



Ciaran Coneely

Move to a location 100 feet away and they have to apply for a new injunction.

2d Reply







Tia _

Time to shop locally I think

3d Reply







AspoonfullofBean

why don't you just stop supplying to them then

3d Reply







Dee

naughty naughty Morrisons

2d Reply







Emily_FA



words are cheap actions cost.

11:21





1 comment

X



Chrissy claas FTA

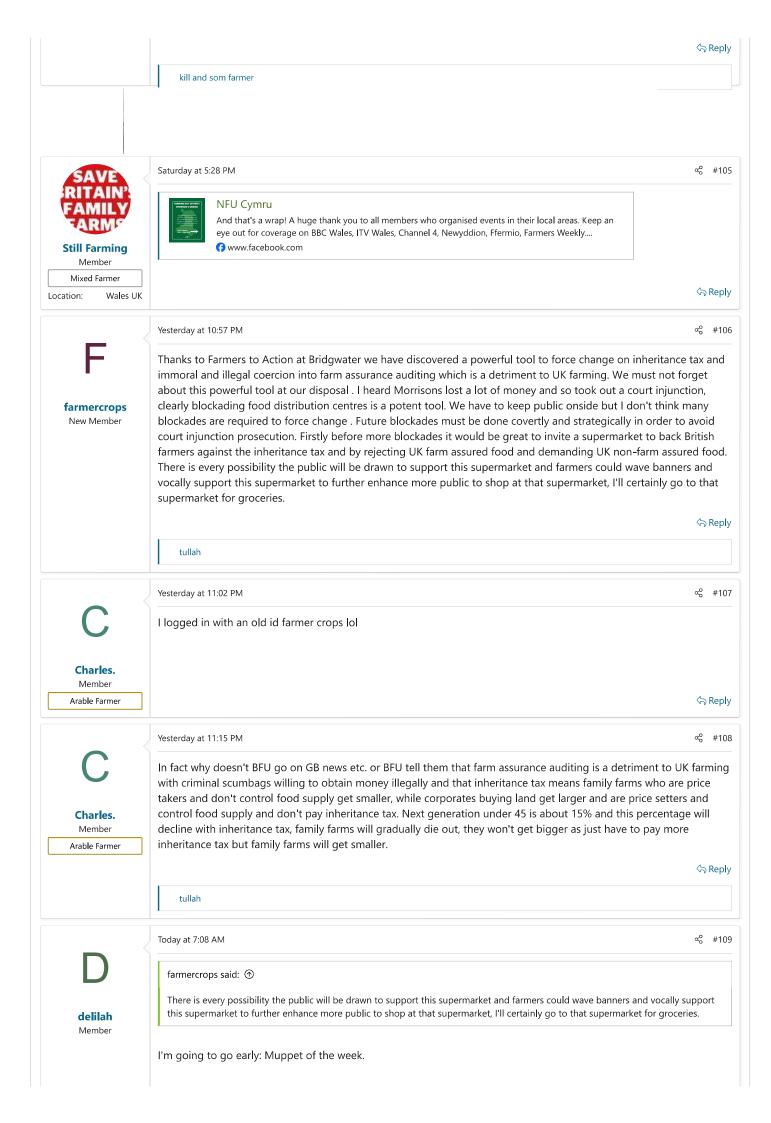
We will never stop 👊 👊 💥 🎉 🦾 💪 🤚



1d Reply









Thank you, Tesco, for supporting farmers on the issue of Inheritance Tax. It's encouraging to see you take this positive step forward

A https://www.tescoplc.com/supporting-the-long-term.../

@Keir_Starmer @RachelReevesMP the public and industry are against this.











THANK YOU FOR SUPPORTING FARMERS ON INHERITANCE TAX

STARMER IS A TESCO HARMER

Starmer put £60,000,000 on the wage bill. The 237,600* workers won't see the money but GUESS WHO WILL PAY FOR IT? ...every week ...



Thank you, Lidl GB, for supporting farmers on the issue of Inheritance Tax. This is a commendable step in the right direction.

A https://corporate.lidl.co.uk/.../lidl-backs-farming...

@Keir_Starmer @RachelReevesMP the public and industry are against this.











THANK YOU FOR SUPPORTING FARMERS ON INHERITANCE TAX

STARMER IS A LIDL HARMER

Starmer put £7,200,000 on the wage bill.

The 32,000* workers won't see the money but GUESS WHO WILL PAY FOR IT?

...every week...





Thank you, Aldi UK, for supporting farmers on the issue of Inheritance Tax. This is a meaningful step in the right direction.

@Keir_Starmer @RachelReevesMP the public and industry are against this.















THANK YOU FOR SUPPORTING FARMERS ON INHERITANCE TAX

STARMER IS AN ALDI HARMER

Starmer put £10,800,000 on their wage bill. The 45,000* workers won't see the money but GUESS WHO WILL PAY FOR IT? ...every week ...





Thank you, Co-op, for supporting farmers on the issue of Inheritance Tax. This is an important and positive step forward.

@Keir_Starmer @RachelReevesMP it's clear the public and industry against this.











THANK YOU FOR SUPPORTING FARMERS ON INHERITANCE TAX

STARMER IS A CO-OP HARMER

Starmer put £11,400,000 on their wage bill. The 55,000* workers won't see the money but GUESS WHO WILL PAY FOR IT? ...every week...





33



1 comment 8 shares



Comment

(Send



Share



Chris Marchment Rachel you listening A Farmers To Action

Like Reply

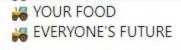








•••



#together



THANK YOU FOR SUPPORTING FARMERS ON INHERITANCE TAX

STARMER IS A M&S HARMER

Starmer put £89,050,000 on their wage bill.

The 64,000* workers won't see the money but GUESS WHO WILL PAY FOR IT?

...every week...



...

Happening Across Britain Today

Come & say hi to your local Farmers, we will be meeting at various locations - ensuring MPs & Councillors are aware of the urgent IHT situation

Make sure you tell your MP & Councillors particularly in marginal constituencies!



JANUARY 25TH 2025

FOLLOW OUR SOCIALS FOR LIVE UPDATES
ON FUTURE EVENTS

#together

www.farmerstoaction.com

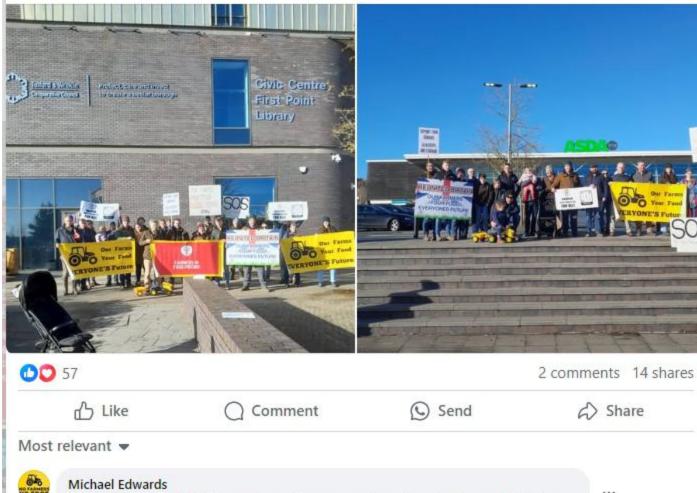


Day of Action round U.K.

: Telford

@FarmersToAction meeting at various locations round U.K. - ensuring MPs & Councillors are aware of urgent situation re Family Farms Tax

Make sure you tell your MP & Councillors particularly in marginal constituencies!





I spent the day at kiddy morisons. The support we have by the public is huge.

