

CLAIM NO:

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

B E T W E E N

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

Claimants

- and -

- (1) PERSONS UNKNOWN AS DESCRIBED IN THE SCHEDULE 1 ATTACHED TO THE
CLAIM FORM**
- (2) PERSONS UNKNOWN AS FURTHER DESCRIBED IN THE SCHEDULE 1 ATTACHED TO
THE CLAIM FORM**

Defendants

CERTIFICATE OF URGENCY

I, Andrew James Todd, Partner of Eversheds Sutherland (International) LLP Solicitors, Water Lane, Leeds, LS11 5DR, representing the Claimants ("**the Claimants**") in this action **HEREBY CERTIFY** that this matter is of an urgent nature and requires to be heard urgently and without notice to the Defendants.

The INSERT Claimant trades as Morrisons, a national supermarket chain. The Claimants are all part of the Morrisons' Group and they seek an urgent injunction to restrain unlawful protest action at the proposed injunction sites, being certain regional distribution centres (as are more particularly described in the Particulars of Claim (the "**Sites**")) against Persons Unknown who are understood to be protesting changes announced by the Government announced in the Autumn Budget 2024 to reduce the scope and rate of agricultural property relief and business property relief from 6 April 2026 and for fair pricing for food and food security.

The Claimants make this urgent injunction application following the unlawful protest action which took place at the Claimants' regional distribution centre at Willow Green in Bridgwater overnight on Friday, 10 January 2025, and which involved the blockading of access roads leading to/from it - preventing access to/from the site and causing significant disruption to the Claimants' business operations immediately from it and more widely (as more fully described in the witness evidence filed in support of the Claimants' application).

For the reasons more fully set out in the witness evidence filed in support of the Claimants' injunction application, there is a real and imminent risk that:

1. some or all of the Sites will be the target of future unlawful protest action;
2. such unlawful protest action is anticipated to take place on 17 January 2025, if not earlier (for the reasons explained in the witness evidence which accompanies the Claimants' application);
3. such unlawful protest action is likely to be similar in nature to that experienced at the Willow Green site; and
4. any such unlawful protest action would cause significant disruption to the Claimants' business operations.

We set out below paragraph 3 of Practice Direction to Civil Procedure Rule 55.

"3.1 The court may exercise its powers under rules 3.1(2)(a) and (b) to shorten the time periods set out in rules 55.5(2) and (3).

3.2 Particular consideration should be given to the exercise of this power if:

- (1) the defendant, or a person for whom the defendant is responsible, has assaulted or threatened to assault:
 - a) the claimant;*
 - b) a member of the claimant's staff; or*
 - c) another resident in the locality;**
- (2) there are reasonable grounds for fearing such an assault; or*
- (3) the defendant, or a person for whom the defendant is responsible, has caused serious damage or threatened to cause serious damage to the property or to the home or property of another resident in the locality."*

Given the apprehended future unlawful protest action, in particular the anticipated action of 17 January 2025 (as more fully described in the witness evidence filed in support of the Claimants' application), and the serious impact that this would have to the Claimants' business, we respectfully request that this matter is urgently referred to a Judge and that the Court exercises its powers under CPR 3.1 to issue the Court papers today and provide a hearing date at the earliest possible opportunity.

SIGNED:


.....
Andrew James Todd

DATED: 15 January 2025