

Party: Claimants

Name: Andrew James Todd

Number: Fifth

Date: 6 February 2025

CLAIM NO: KB-2025-000136

**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

- 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**

Defendants

EXHIBIT AJT6

From: Todd, Andrew
Sent: 29 January 2025 16:38
To: info@farmerstoaction.org
Cc: Wright, Alexander
Subject: RE: Morrisons v Persons Unknown
Attachments: SEALED ORDER WM Morrisons v PU. HHJ Tindal. 29125. KB-2025-000136.pdf

Please see attached Order

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: 28 January 2025 18:04
To: info@farmerstoaction.org
Cc: Wright, Alexander
Subject: FW: Morrisons v Persons Unknown
Attachments: WM Supermarkets v PU. Cs Skeleton Argument for Hearing. 28125.pdf

Please see skeleton argument attached

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.

Rylatt, Alisha

From: Todd, Andrew
Sent: 28 January 2025 18:05
To: info@farmerstoaction.org
Cc: Wright, Alexander
Subject: FW: Morrisons v Persons Unknown
Attachments: Exhibit SR2(236938687.1)(236940397.1).pdf; Scott Roberts 2 - Signed.pdf

Please see attached witness statement with exhibit

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.

Rylatt, Alisha

From: Todd, Andrew
Sent: 28 January 2025 18:05
To: info@farmerstoaction.org
Cc: Wright, Alexander
Subject: RE: Morrisons v Persons Unknown
Attachments: Fourth Witness Statement of Andrew Todd - 28 January 2025(236936815.1).pdf;
AJT5(236849431.1).pdf

Please see attached witness statement with exhibit

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.

Subject: WM Morrison Supermarkets Limited v Persons Unknown
Attachments: Note of Hearing 29.01.2025(237085653.1).pdf

From: Todd, Andrew
Sent: 04 February 2025 12:14
To: Farmers To Action <info@farmerstoaction.org>
Subject: WM Morrison Supermarkets Limited v Persons Unknown

Please see attached Note of the Hearing held on 29 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.