

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**

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

FOURTH WITNESS STATEMENT OF

ANDREW JAMES TODD

I **ANDREW JAMES TODD** of Eversheds Sutherland (International) LLP, Water Lane, Leeds LS11 5DR **WILL SAY** as follows:-

1. I am a Senior Partner in the firm of Eversheds Sutherland (International) LLP and am responsible for the overall conduct of these proceedings on behalf of the Claimants.
2. Following the hearing of the Claimants' application for an injunction in respect of the Claimants' Regional Distribution Centres ("**RDCs**") on Thursday 16 January 2025 ("**Initial Hearing**"), the Claimants were granted an injunction by way of an order dated 16 January 2025 ("**Initial Order**") (a copy of which is exhibited at "**AJT5**").
3. Pursuant to the terms of the Initial Order, the injunction granted lasted until the return hearing on Monday 20 January 2025 ("**Return Hearing**"). At the Return Hearing, Mr Justice Fordham granted an Order dated 20 January 2025 ("**Interim Order**") for the continuation of the injunction granted by the Initial Order.
4. The Interim Order was then replaced by the revised Order ("**Revised Order**") of Mr Justice Fordham dated 21 January 2025 (a copy of which is exhibited at "**AJT5**"). The Revised Order grants an injunction which, in general terms, prohibits the Defendants from:
 - 4.1 entering, occupying or remaining upon any part of the Distribution Centres (as defined in the Revised Order) without the consent of the Claimants in connection with agricultural protests; and/or
 - 4.2 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 Access Roads in connection with agricultural protests.
5. The injunction granted by the Revised Order is intended to replace the injunction granted by the Initial Order (which was continued by the Interim Order).
6. The Revised Order states that there is to be a further return date listed 28 January 2025 at 12pm ("**Further Return Hearing**"), at which the Court will consider whether the injunctions granted by the Revised Order shall continue for a further period and, if appropriate, give case management directions for the progression of the claim.

7. The recitals of the Revised Order confirm that the provisions for alternative service set out in paragraphs 8-12 and 14 of the Initial Order are to remain unaffected and in force.
8. The recitals of the Revised Order also confirm that the Claimants have taken all practicable steps to notify the Defendants of the application prior to the Return Hearing pursuant to section 12(1) and (2) of the Human Rights Act 1998.
9. The Revised Order was subsequently amended by the Court on 24 January 2025 (the "**Amended Revised Order**"), to reflect that the Further Return Hearing is now listed for 29 January 2025 at 12:00pm (exhibited at "**AJT5**").
10. I make this statement to assist the Court in considering matters at the Further Return Hearing and to confirm the steps taken to serve the Defendants with documents relating to the Return Hearing and the Further Return Hearing including obviously the discharge of the undertakings given to the Court at Schedule 3 to the Initial Order, the Interim Order, Revised Order and Amended Revised Order.
11. This witness statement has been produced by me with the assistance of my colleagues, Alex Wright and Alisha Rylatt.
12. The statements in this witness statement are from my own knowledge, save where I state otherwise. Where statements are matters of information or belief, I provide the source of that information or belief.
13. For ease of reference, this witness statement is divided into the following sections:
 - 13.1 Section 1 – Service of Claim Documents
 - 13.2 Section 2 – Service of Orders
 - 13.3 Section 3 – Correspondence with the Defendants during and after the Hearing on 20 January 2025
 - 13.4 Section 4 – Protest Action since Return Hearing
 - 13.5 Section 5 – Full and Frank Disclosure
14. I refer to exhibit marked "**AJT5**" in this statement. It has been produced to me and I verify that the documents in those exhibits are true copies of the documents.

SECTION 1 – SERVICE OF CLAIM DOCUMENTS

15. Paragraph 8 of the Initial Order states service of the Claim Documents (being the amended Claim Form, the Application, and Witness Statements (with the names of the witnesses and addresses removed) with their exhibits) ("**the Claim Documents**") on the Defendants shall be validly effected by:
 - 15.1 Uploading copies of the Claim Documents to the following website: www.morrisonsoncorporate.com/injunction ("**the Claimants' Website**");
 - 15.2 Sending an email to the email addresses listed in Schedule 4 of the Initial Order (being info@farmerstoaction.org) ("**the Farmers to Action Email Address**") stating that a claim has been brought and an application made, and that the Claim Documents can be found on the website referred to above; and
 - 15.3 Affixing the relevant Warning Notice (as defined in the Initial Order) ("**the Warning Notices**") at those locations marked with an "X" on the Plans (as defined in the Order) ("**the Plans**") setting out where the Claim Documents can be found and obtained in hard copy.
16. From conversations and emails exchanged with relevant individuals providing instructions to this firm, I can confirm that of the Claim Documents:
 - 16.1 the Second Witness Statement of Andrew Todd, the Exhibits to the Second Witness Statement of Andrew Todd, the Third Witness Statement of Andrew Todd, the Skeleton Argument for Return Hearing on 20 January 2025 and the Draft Order for Return Hearing on 2025 were uploaded to the Claimant's Website prior to the Return Hearing; and
 - 16.2 the Sealed Re-Amended Claim Form received on 27 January 2025 from the Court was uploaded to the Claimant's Website on 28 January 2025 together with the Amended Revised Order.
17. I can confirm that the Claim Documents were served on the Defendants by emails sent to the Farmers to Action Email Address via the following emails (as exhibited at "**AJT5**"):
 - 17.1 on 20 January 2025 at 11.41am – Second Witness Statement of Andrew Todd, Skeleton Argument for Return Hearing, the Draft Order for Return Hearing and Note of Injunction Hearing dated 16 January 2025;
 - 17.2 on 20 January 2025 at 12:03pm - Exhibits to Second Witness Statement of Andrew Todd;

- 17.3 on 20 January 2025 at 1.06pm – Third Witness Statement of Andrew Todd;
- 17.4 on 22 January 2025 at 4:56pm – Note of Return Hearing dated 20 January 2025
- 17.5 on 27 January 2025 at 10:44am - the Sealed Re-Amended Claim Form.
18. From conversations and emails exchanged with relevant individuals providing instructions to this firm, I can confirm that the Warning Notices provided for under the Revised Order were affixed at the relevant locations as detailed in the below table (replacing those Warning Notices affixed pursuant to the terms of the Initial Order):

	Day / Time Affixed By
Swan Valley 1	23 rd January 2025 @ 12:00pm
Swan Valley 2	23 rd January 2025 @ 12:00pm
Swan Valley 3	23 rd January 2025 @ 12:00pm
Stockton	23 rd January 2025 @ 9:30am
Sittingbourne	23 rd January 2025 @ 10:00am
Gadbrook	23 rd January 2025 @ 10:40am
Latimer Park Kettering	23 rd January 2025 @ 11:40am
Latimer Park Corby	23 rd January 2025 @ 4:30pm
Willow Green North (Kings Dr)	23 rd January 2025 @ 10:00am
Willow Green South (Bristol Rd)	23 rd January 2025 @ 10:30am
Wakefield	23 rd January 2025 @ 2:00pm

SECTION 2 – SERVICE OF ORDERS

19. Paragraph 9 of the Initial Order states service of the Order on the Defendants shall be validly effected by:

- 19.1 producing a copy of the Order to the Claimant's Website;
- 19.2 sending an email to the Farmers to Action Email Address attaching a copy of the Order; and
- 19.3 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.
20. From conversations and emails exchanged with relevant individuals providing instructions to this firm, I can confirm that the Interim Order was uploaded to the Claimants' Website at 6:40pm on 20 January 2025.
21. As I state above, I can confirm that the Interim Order was served on the Defendants by an email sent to the Farmers to Action Email Address at 6:37pm on 20 January 2025. A copy of this email is exhibited at "**AJT5**".
22. Furthermore, from conversations and emails exchanged with relevant individuals providing instructions to this firm, I can confirm that the Revised Order was uploaded to the Claimants' Website at 9:00pm on 21 January 2025.
23. As I state above, I can confirm that the Revised Order was served on the Defendants by an email sent to the Farmers to Action Email Address at 7:33pm on 21 January 2025. A copy of this email is exhibited at "**AJT5**".
24. I can confirm that the Amended Revised Order was served on the Defendants by an email sent to the Farmers to Action Email Address at 11:31am, on 27 January 2025. A copy of this email is also exhibited at "**AJT5**".
25. From conversations and emails exchanged with relevant individuals providing instructions to this firm, I can confirm that a copy of the Revised Order was affixed at the relevant locations as detailed in the below table (and as at the date of this statement the Claimants are in the process of affixing the Amended Revised Order at the locations detailed in the below table):

	Day / Time Affixed By
Swan Valley 1	23 rd January 2025 @ 12:00pm
Swan Valley 2	23 rd January 2025 @ 12:00pm
Swan Valley 3	23 rd January 2025 @ 12:00pm

Stockton	23 rd January 2025 @ 9:30am
Sittingbourne	23 rd January 2025 @ 10:00am
Gadbrook	23 rd January 2025 @ 10:40am
Latimer Park Kettering	23 rd January 2025 @ 11:40am
Latimer Park Corby	23 rd January 2025 @ 4:30pm
Willow Green North (Kings Dr)	23 rd January 2025 @ 10:00am
Willow Green South (Bristol Rd)	23 rd January 2025 @ 10:30am
Wakefield	23 rd January 2025 @ 2:00pm

SECTION 3 – CORRESPONDENCE WITH THE DEFENDANTS DURING AND AFTER THE HEARING ON 20 JANUARY 2025

26. As detailed in paragraph 33 of my second witness statement, an email from the Farmers to Action Email Address addressed to myself (AndrewTodd@eversheds-sutherland.com) and KBEnquiries@justice.gov.uk and timed at 9:00am on 20 January 2025 requested time to read the 'extensive documentation' and to consider whether the Defendant needed 'to seek counsel' (exhibited at "**AJT5**").
27. At the Return Hearing, at the request of Mr Justice Fordham I sent an email to the Farmers to Action Email Address at 3.13pm, affording them the opportunity to clarify (i) what was meant by "more time" in the Defendants email timed at 9:00am (ii) what the Defendants position was in response to the Claimants' proposal that the matter be deferred for 7 days and (iii) if the Defendant required a deferral, whether they would be agreeable to the case being heard on Friday 24 January 2025 (exhibited at "**AJT5**").
28. I then sent a further chaser email to the Farmers to Action Email Address at 3.37pm, requesting a response to my initial email (exhibited at "**AJT5**"). I have not received a response to either of the emails which were sent as at the date of this witness statement.

29. Shortly before the Return Hearing I received an email from a Mr Chris Fellows timed at 1:47pm, confirming that he was one of the owners of 'The Farming Forum' and that he was 'happy to help regarding posting up information' concerning the injunction.
30. I replied directly to Mr Fellows at 2:31pm on 22 January 2025, noting the recent coverage of the injunction on The Farming Forum webpage and requesting that he post to the relevant chat thread that all documents relating to the injunction (including the Revised Order) are available on the Claimants' Website.
31. Mr Fellows responded to my above email on 24 January 2025, in an email timed at 12:25pm). A copy of this email is (exhibited at "AJT5"). Mr Fellows' email:
- 31.1 explains that he is a director of Agri Web Media Ltd – which is an advertising sales company that operates platforms including 'The Farming Forum';
- 31.2 states that "to clarify...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";
- 31.3 states that "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"; and
- 31.4 comments that "we are concerned that the inclusion of The Farming Forum (part of Agri Web Media Ltd) in [the Court] 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".
32. On 27 January 2025 at 9:33am, I received an email from the Farmers to Action Email Adress (also copied to Jessica.Turner1@justice.gov.uk, EBarden@landmarkchambers.co.uk, MStacey@landmarkchambers.co.uk and AlexWright@eversheds-sutherland.com) in response to their email timed at 9:00am on 20 January 2025, stating:

"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

SECTION 4 – PROTEST ACTION SINCE RETURN HEARING

33. On 19 January 2025 at 7:52pm, X user @FarmingUK posted a video of protestors attending a Tesco distribution centre with the caption "*Farmers protested outside Tesco's distribution centre in Reading today*" (exhibited at "**AJT5**" and available at <https://x.com/farminguk/status/1881067118948761782?s=46>). The video depicts a number of tractors participating in a 'go-slow' drive, with one tractor displaying a placard stating "No Farming No Food" and another stating "With Our Farmers #together".

34. Since the Return Hearing, various commentary has been made across social media sites, indicating a threat of future protest action at the Claimants RDCs, which are the subject of the Revised Injunction.

35. On 22 January 2025 at 8:37pm, a Farming Forum member posted the following comment on the thread entitled "Tesco, ASDA, Morrisons, LIDL, Aldi, Co-op, Sainsburys all backing stopping Rachel Reeves IHT policy" in response to a comment regarding recent protest action against changes to inheritance tax reliefs:

"Absolutely. Got to keep going until its overturned though."

(exhibited at "**AJT5**" and available at <https://thefarmingforum.co.uk/index.php?threads/tesco-asda-morrisons-lidl-aldi-co-op-sainsburys-all-backing-stopping-rachel-reeves-ih-policy.421165/>)

36. On 22 January 2025 at 8:48pm, a Farming Forum member posted the following comment on the thread entitled "Tesco, ASDA, Morrisons, LIDL, Aldi, Co-op, Sainsburys all backing stopping Rachel Reeves IHT policy" regarding future protest action:

"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."

(exhibited at "**AJT5**" and available at <https://thefarmingforum.co.uk/index.php?threads/tesco-asda-morrisons-lidl-aldi-co-op-sainsburys-all-backing-stopping-rachel-reeves-ih-policy.421165/>)

37. On 22 January 2025 at 9:22pm, another Farming Forum member posted the following comment on the thread entitled "Tesco, ASDA, Morrisons, LIDL, Aldi, Co-op, Sainsburys all backing stopping Rachel Reeves IHT policy" regarding future protest action:

"Covertly and strategically blocking distribution centres in a way such farmers can't be prosecuted is the way to go if this evil tyranny of inheritance tax and the evil tyranny of immoral and illegal forcing farmers into a parasitic farm assurance scheme which equates to ever declining farm income and ever increasing farm workload for the vast majority continues."

(exhibited at "**AJT5**" and available at <https://thefarmingforum.co.uk/index.php?threads/tesco-asda-morrisons-lidl-aldi-co-op-sainsburys-all-backing-stopping-rachel-reeves-ihp-policy.421165/>)

38. On 20 January 2025 at 11:22pm, X user @Jeffdavies741 commented on a post made by the Claimant stating *"Fuck your injunction I will at 1 of your depots. #boycottmorrison"* (exhibited at "**AJT5**" and available at <https://x.com/jeffdavies741/status/1881482416130551890>).
39. On 22 January 2025, Instagram user @prtester6 commented on a post made by @farmersweekly regarding the injunction granted to the Claimants stating *"Ignore the injunction. It's nonsense. The police can stop the right to protest unless it is stopping someone's right to do business. If a detour is possible then no-one will stop it."* (exhibited at "**AJT5**").
40. On 20 January 2025, Instagram user @hemz88ly commented on the same post made by @farmersweekly saying *"Chain there gates shut n roller doors or weld them Shut"* (exhibited at "**AJT5**").
41. On 21 January 2025, TikTok user @jackludwell commented on a post to the site regarding the Claimants injunction stating *"If we all go to Morrisons they can't lock all of us up then they won't have any food anyways so sounds like a them problem"* (exhibited at "**AJT5**").
42. On 22 January 2025, TikTok user @CiaranConeely commented on the same post as mentioned above, stating *"Move to a location 100 feet away and they have to apply for a new injunction"* (exhibited at "**AJT5**").

43. On 26 January 2025, TikTok user @Chrissyclaas, a supporter of Farmers to Action, commented on a post made by @thealanvibe regarding recent protest action stating "We will never stop. @FarmersToAction" (exhibited at "AJT5").

44. On 26 January 2025 at 10:57pm, a Farming Forum member posted the following comment on the thread entitled "Tesco, ASDA, Morrisons, LIDL, Aldi, Co-op, Sainsburys all backing stopping Rachel Reeves IHT policy" regarding future protest action:

"Thanks to Farmers to Action at Bridgwater we have discovered a powerful tool to force change on inheritance tax and immoral and illegal coercion into farm assurance auditing which is a detriment to UK farming. We must not forget about this powerful tool at our disposal . I heard Morrisons lost a lot of money and so took out a court injunction, clearly blockading food distribution centres is a potent tool. We have to keep public onside but I don't think many blockades are required to force change . Future blockades must be done covertly and strategically in order to avoid court injunction prosecution. Firstly before more blockades it would be great to invite a supermarket to back British farmers against the inheritance tax and by rejecting UK farm assured food and demanding UK non-farm assured food. There is every possibility the public will be drawn to support this supermarket and farmers could wave banners and vocally support this supermarket to further enhance more public to shop at that supermarket, I'll certainly go to that supermarket for groceries."

(exhibited at "AJT5" and available at <https://thefarmingforum.co.uk/index.php?threads/tesco-asda-morrisons-lidl-aldi-co-op-sainsburys-all-backing-stopping-rachel-reeves-iht-policy.421165/page-6>).

SECTION 5 – FULL AND FRANK DISCLOSURE

45. I am aware that the Claimants have to give full and frank disclosure and I confirm that the Claimants have given full and frank disclosure of all facts, matters and arguments which, after reasonable research, they are aware or could with reasonable diligence ascertain and which might affect the decision of the Court whether to grant the order or the terms of the order it is prepared to make.

46. With that duty in mind, I note that on 22 January 2025 at 3:00pm, the Farmers to Action Facebook page uploaded a photo stating "Tesco. Thank you for supporting farmers on inheritance tax. Starmer is a Tesco Harmer. Starmer put

£60,000,000 on their wage bill. The 237,600 workers won't see the money but GUESS WHO WILL PAY FOR IT? ...every week...". The photo has been captioned with "Thank you, Tesco, for supporting farmers on the issue of Inheritance Tax. It's encouraging to see you take this positive step forward. https://www.tescopl.com/supporting-the-long-term-sustainability-of-the-uk-agriculture-sector/?fbclid=IwY2xjawIAqT5leHRuA2FlbQIxMAABHcTiAw25R-DbudUYjYKSHEE_qeUJHN3tcqUHUp80hoe6w_lV9DoVPETJ9A_aem_VXLxXfXAYJZeWvCOwowRnQ. @Keir_Starmer @RachelReevesMP the public and industry are against this. OUR FARMERS. YOUR FOOD. EVERYONE's FUTURE"*

47. On 22 January 2025 at 4:00pm, the Farmers to Action Facebook page uploaded a photo stating "Lidl. Thank you for supporting farmers on inheritance tax. Starmer is a Lidl Harmer. Starmer put £7,200,000 on their wage bill. The 32,000* workers won't see the money but GUESS WHO WILL PAY FOR IT? ...every week...". The photo has been captioned with "Thank you, Lidl GB, for supporting farmers on the issue of Inheritance Tax. This is a commendable step in the right direction. https://corporate.lidl.co.uk/media-centre/pressreleases/2025/lidl-backs-farming-community-by-calling-for-consultation-over-inheritance-tax?fbclid=IwY2xjawIAqMpleHRuA2FlbQIxMAABHeUUVUF2ukMRoZd6G5sCmoQCeae8LfQsbNuSZT5GR7My6wAHT0av3zG8xg_aem_bPbghxkZt3QKOVVkvN3YQ @Keir_Starmer @RachelReevesMP the public and industry are against this. OUR FARMERS. YOUR FOOD. EVERYONE's FUTURE" (exhibited at **AJT5** and available at <https://www.facebook.com/profile.php?id=61569087725575>).
48. On 23 January 2025 at 6:00am, the Farmers to Action Facebook page uploaded a photo stating "Aldi. 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...". The photo has been captioned with "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 it's clear the public and industry against this. OUR FARMERS. YOUR FOOD. EVERYONE's FUTURE" (exhibited at **AJT5** and available at <https://www.facebook.com/profile.php?id=61569087725575>).
49. On 23 January 2025 at 9:35am, the Farmers to Action Facebook page uploaded a photo stating "Co-op. 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...". The photo has been captioned with "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. OUR FARMERS. YOUR FOOD. EVERYONE's FUTURE" (exhibited at **AJT5** and available at <https://www.facebook.com/profile.php?id=61569087725575>).

50. On 23 January 2025 at 11:00am, the Farmers to Action Facebook page uploaded a photo stating "*M&S. 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...*". The photo has been captioned with "*Thank you, Marks and Spencer, for standing with farmers on the issue of Inheritance Tax. This is a noteworthy and positive action. @Keir_Starmer @RachelReevesMP, it's clear that both the public and the industry stand firmly against this. OUR FARMERS. YOUR FOOD. EVERYONE's FUTURE"* (exhibited at **AJT5** and available at <https://www.facebook.com/profile.php?id=61569087725575>).
51. On 25 January 2025 at 8:24am, the Farmers to Action Facebook page uploaded a photo stating "*January 25th 2025. Follow our socials for live updates on future events. #together"*. The photo was captioned with "*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!"* (exhibited at **AJT5** and available at <https://www.facebook.com/profile.php?id=61569087725575>).
52. On 27 January 2025 at 2:29pm, the Farmers to Action Facebook page uploaded two photographs of protesters at various locations in the UK, captioned "*Day of Action round UK. 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!"*. One Facebook user commented "*I spent the day at kiddy Morrisons. The support we have by the public is huge."* (exhibited at **AJT5** and available at <https://www.facebook.com/profile.php?id=61569087725575>).
53. On 27 January 2025 at 10:19am, @Togetherdec uploaded a photo to X, stating "*Sainsbury's, Waitrose, Ocado. Thank you for supporting farmers on inheritance tax. Starmer is a supermarket harmer. Starmer put millions on their wage bill. The workers won't see the money but GUESS WHO WILL PAY FOR IT? ... every week...*". The photo was captioned "*Thank you, @sainsburys, @waitrose, and @ocado, for*

standing with farmers on the issue of Inheritance Tax. @Keir_Starmer @SteveReedMP @RachelReevesMP the public and industry are united against this. OUR FARMERS. YOUR FOOD. EVERYONE'S FUTURE. A Fair Price for Farmers. A Fair Price for All. Follow @FarmersToAction & on all platforms." (exhibited at **AJT5** and available at <https://x.com/Togetherdec/status/1883822175548735994>).

Statement of truth

I believe that the facts stated in this Witness Statement are true.

I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

I am duly authorised to make this statement on the Claimants' behalf.



Andrew James Todd | 28 January 2025