

Party: Claimants
Name: Andrew James Todd
Number: Second
Date: 20 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 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

**THIRD 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. This witness statement has been produced by me with the assistance of my colleague Alex Wright.

3. 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.
4. This is my third witness statement in these proceedings. It has been prepared to make the Court aware of a now deleted, social media post made to the 'Farmers to Action' account on X (formerly Twitter) - @FarmersToAction.
5. A screenshot showing a link to the relevant, now deleted, social media post is below together with the top half of the image which accompanied it:



6. The above image is taken from a screenshot of a phone belonging to an employee of the First Claimant, who has shared it with me and asked that their name be redacted from the above image in the light of the post's disturbing content – which, the relevant individual, who has informed me that they viewed it in full, has informed me and would appear to me to show a picture of the Prime Minister (Sir Kier Starmer) as a puppeteer hanging a farmer in a supermarket setting with 'Morrisons' branding (i.e. attached to the ends of the strings emanating from Sir Kier Starmer's hands is the image of a hung farmer).

7. I have instructed relevant colleagues working with me on this matter to attempt to locate a complete copy of the image, but this has not been possible – the relevant post having since been deleted from the 'Farmers to Action' account on X (formerly Twitter) - @FarmersToAction.

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.

A handwritten signature in black ink, appearing to read 'A. J. Todd', written over a horizontal line.

Andrew James Todd | 20 January 2025