

Party: Claimants  
Name: Joanna Goff  
Number: First  
Date: 15 January 2025  
**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**

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**WITNESS STATEMENT OF JOANNA LOUISE GOFF**

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I, **JOANNA LOUISE GOFF** of Wm Morrisons Supermarket Limited of Hilmore House, Gain Lane, Bradford, West Yorkshire, BD3 7DL WILL SAY as follows:-

1. I am the Chief Financial Officer (the "**CFO**") and a board director of the First Claimant, WM Morrisons Supermarket Limited. The Claimants form part of the Morrisons Group, of which the First Claimant is the parent company, and as such I am for all subsidiaries and group companies.
2. I joined WM Morrisons Supermarket Limited in 2011 as Head of Group Finance and became the CFO in April 2022.
3. I make this witness statement in support of the Claimants' application for an injunction in respect of certain of the Claimants' Regional Distribution Centres ("**the Injunction Sites**") (the "**Application**").

4. This witness statement has been produced by me with the assistance of solicitors from Eversheds Sutherland (International) LLP, the firm acting on behalf of the Claimants (the "**Claimants' Solicitors**").
5. 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.

**The Claimants' Cross-Undertaking in Damages**

6. The Claimants' Solicitors have advised the Claimants that it is best practice for a cross-undertaking in damages to be provided by parties who are making an application for an injunction in order to compensate anyone who suffers loss or damage from an injunction order, interim or otherwise, if it is subsequently determined that this ought not to have been granted.
7. Although I cannot foresee any way in which anyone affected by the proposed injunction could suffer loss or damage, I am authorised to provide the necessary cross-undertaking on behalf of the First Claimant to pay any sum which the Court considers appropriate to compensate anyone affected by the proposed injunction to prevent the Defendants from entering upon and protesting at the Injunction Sites if it is subsequently determined that the Claimants are not entitled to the order which they seek. I confirm that such undertaking is provided by the First Claimant on behalf of the Claimants as a whole.
8. The audited accounts for the First Claimant for the year ending 29 October 2023 show the following:

Revenue for the year ending 29.10.23	Operating Profit for the year ending 29.10.23	Cash and Cash Equivalents as at 29.10.23
£18,358,000,000	£89,000,000	£279,000,000

**STATEMENT OF TRUTH**

I believe that the facts stated in this Witness Statement and Exhibits 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.

  
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**Joanna Louise Goff** | 15 January 2025