

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

WITNESS STATEMENT OF

[REDACTED]

I, [REDACTED] of [REDACTED] of [REDACTED] WILL SAY as follows:-

1. I joined WM Morrison Supermarket Limited in [REDACTED] as [REDACTED] and became [REDACTED] My present role [REDACTED] which owned by the First Claimant.
2. 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**").

are not carrying out protests against Morrisons. On 13 January 2025 one FTA WhatsApp user wrote:

"We need to block distribution centres empty the shelves, the public will realise how important farming is to the country and the government may just open their eyes, we keep tip toeing at this but nothing is changing."

(enclosed at page 1 of exhibit [REDACTED]1).

9. Further WhatsApp messages are produced at pages 2-11 of exhibit [REDACTED]1, in which strategy and ideas for future protest action are discussed. The Court will note that one message states "Just block the diary's (sic) and distribution centres. It couldn't be more simple". A WhatsApp message says "Next week we are hitting distribution centres, 12 hours, no bull shit taken. There's only so many times I can explain to people the steps that there's steps in certain order we take. Basically speaking who can commit to 12 hours, probably Wednesday/Thursday evening. THIS IS NOT A ROAD RUN" The WhatsApp messages have been redacted to protect the privacy of the individuals given the urgency and timescales of the Application.

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.

[REDACTED]

[REDACTED]

15 January 2025

