Party: Claimants
Name: Number: First

Date: 15 January 2025

CLAIM NO:

IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

BETWEEN

- (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

	ATTACHED TO THE CEATH TORK	<u>Defendants</u>
	WITNESS STATEMENT OF	-
[,	of WILL SAY as follows:-	
1.	I joined WM Morrison Supermarket Limited in as and became	Му
	present role owned by the First Claimant.	which
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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").

- 3. This witness statement has been produced by me with the assistance of Eversheds Sutherland (International) LLP, the firm acting on behalf of the Claimants (the "Claimants' Solicitors").
- 4. 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.
- 5. I refer to exhibits marked 1 in this statement. They have been produced to me and I verify that the documents in those exhibits are true copies of the documents.

RESPONSE TO DIRECT PROTEST ACTION

6. As part of the Claimant's response to the direct protest action on Friday, 10 January 2025,



7. To reiterate, whilst the Claimants can appreciate and sympathise with the motivations and reasons for the protest action being taken, the Claimants do not in any way endorse unlawful protest action.

FARMERS TO ACTION - 2025 PROTEST ACTION

8. It is understood that WhatsApp groups are being used by farmers' groups to coordinate the localised protests. I understand this because I have been provided with copies of Whatsapp messages by an individual in one of these groups. That individual is unnamed for their safety and because they have informed me that they

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 faming 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 1).

9. Further WhatsApp messages are produced at pages 2-11 of exhibit 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.



15 January 2025

