

IN THE HIGH COURT OF JUSTICE

Claim No. PT-2024-000893

BUSINESS AND PROPERTY COURTS

OF ENGLAND AND WALES (ChD)

PROPERTY, TRUSTS AND PROBATE LIST

B E T W E E N:-

THE UNIVERSITY OF LONDON

Claimant

-and-

(1) ABEL HARVIE-CLARK

(2) TARA MANN

(3) HAYA ADAM

**(4) PERSONS UNKNOWN WHO, IN CONNECTION WITH BOYCOTT, DIVESTMENT, AND
SANCTIONS PROTESTS BY THE 'SOAS LIBERATED ZONE FOR GAZA' AND/OR
'DEMOCRATISE EDUCATION' MOVEMENTS, ENTER OR REMAIN WITHOUT THE
CONSENT OF THE CLAIMANT UPON ANY PART OF THE LAND (DEFINED IN
SCHEDULE 1)**

**(5) PERSONS UNKNOWN WHO, IN CONNECTION WITH BOYCOTT, DIVESTMENT, AND
SANCTIONS PROTESTS BY THE 'SOAS LIBERATED ZONE FOR GAZA' AND/OR
'DEMOCRATISE EDUCATION' MOVEMENTS, OBSTRUCT OR OTHERWISE INTERFERE
WITH ACCESS TO AND FROM ANY PART OF THE LAND (DEFINED IN SCHEDULE 1)**

**(6) PERSONS UNKNOWN WHO, IN CONNECTION WITH BOYCOTT, DIVESTMENT, AND
SANCTIONS PROTESTS BY THE 'SOAS LIBERATED ZONE FOR GAZA' AND/OR
'DEMOCRATISE EDUCATION' MOVEMENTS, ERECT ANY TENT OR OTHER
STRUCTURE, WHETHER PERMANENT OR TEMPORARY, ON ANY PART OF THE LAND
(DEFINED IN SCHEDULE 1)**

Defendants

SECOND WITNESS STATEMENT OF CONNOR MERRIFIELD

**I, Connor Merrifield, Solicitor of Pinsent Masons LLP of 55 Colmore Row Birmingham B3
2FG, WILL SAY AS FOLLOWS:**

1. I am duly authorised to make this statement on behalf of the Claimant.
2. Pinsent Masons LLP are instructed by the Claimant in relation to the Claim. I have day-to-day conduct of the Claim on behalf of the Claimant alongside my colleague, Craig Jonathan Downhill.
3. Unless stated otherwise the facts and matters set out in this witness statement are within my knowledge and I believe them to be true. Where any facts or matters are not within my own knowledge, the source of information is identified and those facts and matters are true to the best of my knowledge.

4. I have prepared this witness statement.
5. There is now produced and shown to me marked as **Exhibits “CM15” – “CM17”** a bundle of true copy documents to which I refer in the course of this witness statement.
6. In accordance with the Order of Mr Justice Adam Johnson for alternative service sealed on 16 October 2024, I arranged for service of the following documents upon the Defendants on Wednesday 23 October 2024: -
 - a. Sealed Claim Form;
 - b. Particulars of Claim;
 - c. Enclosures to the Particulars of Claim;
 - d. Witness Statement of Alistair Jarvis dated 11 October 2024;
 - e. Exhibits to the Witness Statement of Alistair Jarvis dated 11 October 2024;
 - f. Sealed application notice in application for an interim precautionary injunction;
 - g. Sealed order in relation to an application for abridgement of time for service of an application for an interim precautionary injunction and supporting documents including:-
 - i. Application Notice;
 - ii. Witness Statement of Craig Downhill dated 15 October 2024;
 - iii. Witness Statement of Craig Downhill dated 16 October 2024;
 - h. Sealed Order for Alternative Service and supporting documents including:-
 - i. Application Notice;
 - ii. Witness Statement of Craig Downhill dated 11 October 2024;
 - i. Notice of hearing in relation to an application for an interim precautionary injunction;
 - j. Hearing Bundle in relation to an application for an interim precautionary injunction;
 - k. Witness Statement of Connor Merrifield dated 22 October 2024 and “USB1” which is a memory stick containing video evidence exhibited to my statement of 22 October 2024;
 - l. Response Pack - including Forms N9, N9C and N9D;
 - m. Claimant’s skeleton argument in relation to its application for an interim precautionary injunction; and
 - n. Claimant’s authorities bundle in relation to its application for an interim precautionary injunction,together, the **“Documents”**.
7. I instructed Paul Cottee of Tremark Associates, being a professional process server, to leave two separate transparent plastic boxes containing the Documents marked for the attention of “the Occupiers” at the following locations (and as more particularised by paragraph 1 of the order for alternative service): -

- a. That part of Byng Place, London, WC1E 7LE the approximate location of which is marked red and as location "A" on the plan appended to the order for alternative service;
- b. The gates on Malet Street, London, the approximate location of which is marked red and as location "B" on the plan appended to the order for alternative service; and
- c. The gates on Thornhaugh Street, London, the approximate location of which is marked in red and as location "C" on the plan appended to the order for alternative service,

together the "**Service Locations**".

8. I understand that Mr Cottee left the 6 plastic boxes, including the Documents, at or around the Service Locations between 13:45 and 14:45 hours on Wednesday 23 October 2024. I have been referred to the Witness Statement of Mr Cottee, as well as photographs provided by Mr Cottee, which confirms this. Copies of Mr Cottee's Witness Statement and of his photographs can be found at Exhibit CM15.
9. The Claimant also uploaded copies of the Documents to the following website:
<https://www.london.ac.uk/about/estate/encampment-legal-papers> which went live at around 14:41 on Wednesday 23 October 2024 as confirmed to me by Natalie Freilich, the Claimant's head of legal by e-mail; a copy of this e-mail can be found at Exhibit CM16.
10. I further sent a link to the abovementioned website by e-mail to the following e-mail addresses between 15:05 and 15:09 on 23 October 2024:-
 - a. 669841@soas.ac.uk and abel.harvieclark@gmail.com (Abel Harvie-Clark);
 - b. 700495@soas.ac.uk (Tara Mann);
 - c. 709237@soas.ac.uk (Haya Adam)
 - d. soasliberatedzone4gaza@proton.me (general encampment e-mail address).
11. I include copies of the abovementioned emails at Exhibit CM17.

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.

Name: Connor Merrifield

Date: 28 October 2024

Signature:

A handwritten signature in blue ink, appearing to read 'C. Merrifield', with a stylized flourish at the end.

Associate Solicitor at Pinsent Masons LLP