

IN THE HIGH COURT OF JUSTICE
BUSINESS AND PROPERTY COURTS
OF ENGLAND AND WALES
PROPERTY TRUSTS AND PROBATE LIST (CHD)

CLAIM NO:

B E T W E E N:-

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' MOVEMENT AND/OR AGAINST THE DISCIPLINARY POLICY OF THE SCHOOL OF ORIENTAL AND AFRICAN STUDIES BY THE 'DEMOCRATISE EDUCATION' MOVEMENT, 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' MOVEMENT AND/OR AGAINST THE DISCIPLINARY POLICY OF THE SCHOOL OF ORIENTAL AND AFRICAN STUDIES BY THE 'DEMOCRATISE EDUCATION' MOVEMENT, 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' MOVEMENT AND/OR AGAINST THE DISCIPLINARY POLICY OF THE SCHOOL OF ORIENTAL AND AFRICAN STUDIES BY THE 'DEMOCRATISE EDUCATION' MOVEMENT, ERECT ANY TENT OR OTHER STRUCTURE, WHETHER PERMANENT OR TEMPORARY, ON ANY PART OF THE LAND (DEFINED IN SCHEDULE 1)**

Defendants

WITNESS STATEMENT OF ALISTAIR JARVIS

I, Alistair Jarvis, CBE, of University of London, Senate House, Malet Street, London WC1E 7HU, **WILL SAY AS FOLLOWS:**

1. I am the Pro Vice-Chancellor (Partnerships and Governance) of the University of London (the "**Claimant**"). I was appointed to this post in June 2022. As such, I am a member of the Claimant's senior executive team which numbers five people in total. My responsibilities include governance, communications, fundraising, marketing, legal, student recruitment, inclusion, regulatory compliance, quality assurance and supporting partnerships with University of London federation members.
2. I am duly authorised by and make this statement in support of the Claimant's application in this claim for an interim injunction to restrain the Defendants from trespassing on the Land (defined in paragraphs 17 and 18 below), as more particularly set out in the Particulars of Claim.
3. This witness statement has been prepared by the Claimant's solicitors, Pinsent Masons LLP ("**Pinsent Masons**"), following a video conference with me on 10 October 2024 in order to deal with my instructions to them about this matter and this witness statement.
4. There is now produced and shown to me marked as **Exhibits "AJ1" - "AJ14"** a bundle of true copy documents to which I refer in the course of this witness statement:

EXHIBIT	DOCUMENT DESCRIPTION	DATE	PAGE(S) OF EXHIBITS
"AJ1"	Image of First, Second and Third Defendants	Undated	1-2
"AJ2"	Plan	Undated	3-4
"AJ3"	Copy of the official copy of the register of title and the title plan for the land in title number 325806	04.10.24	5-14
"AJ4"	Copy of the official copy of the register of title and the title plan for the land in title number LN91321	04.10.24	15-21

"AJ5"	Copy of the official copy of the register of title and the title plan for the land in title number LN94166	04.10.24	22-27
"AJ6"	Copy of the official copy of the register of title and the title plan for the land in title number NGL376460	04.10.24	28-34
"AJ7"	Copy of the register of title and the title plan for the land in title number NGL179751	04.10.24	35-40
"AJ8"	Google Earth image of protest encampments	Undated	41-42
"AJ9"	Images of Second Encampment	Various	43-55
"AJ10"	Images of Third Encampment	Various	56-69
"AJ11"	Images of activities and incidents which have occurred on the Claimant's land since the Second Encampment (primarily bodycam footage)	Various	70-117
"AJ12"	Images from the Instagram account for the SLZG	Various	118-149
"AJ13"	Minute of Gold team meeting	26.09.24	150-153
"AJ14"	Copy invoices	Various	154-164

THE EARLIER PROCEEDINGS

5. This is not the first time that the Claimant has had to bring proceedings against the Defendants.
6. On 25 July 2024, the Claimant issued possession proceedings in this Court against the Defendants and two others (namely, Adam Parker and Sheikh Ibrahim) (the **"Earlier Proceedings"**). That claim proceeded under claim number PT-2024-000646.

7. In the Earlier Proceedings, the Claimant had sought an order for possession in respect of part of its land known as 4th Quadrant, Senate House, Malet Street, London and other parts of its freehold land registered under title number 325806 upon which the Defendants had set up an encampment (the "**Original Encampment**") from where they were conducting pro-Palestinian protests. These protests were directed at the School of Oriental and African Studies ("**SOAS**"), with the protestors having described themselves as the "SOAS Liberated Zone for Gaza" (the "**SLZG**"). Specifically, the protest appears to be against the stance taken by SOAS in respect of investments and/or links it may have to Israel and/or Israeli entities (the "**SLZG Protests**"). In this regard, the SLZG appears to be part of the wider "*Boycott, Divestment, and Sanctions*" movement.
8. On 31 July 2024, the First, Second and Third Defendants attended a hearing before Deputy Master Rhys in the Earlier Proceedings. With the consent of the First, Second and Third Defendants, the Deputy Master made an order against them by which they were required forthwith to give possession to the Claimant of the land upon which they had been trespassing, namely the Yellow Land, as well as the Orange Land, another open area of land in respect of which the Claimant reasonably believed the Defendants would relocate any encampment to, if ordered to vacate the Yellow Land. After considering the evidence and the submissions made to him by Counsel instructed by the Claimant, the Deputy Master made a similar order against Sheikh Ibrahim and Persons Unknown, none of whom made an appearance at the Earlier Proceedings. In this statement, I refer to these two orders collectively as the "**Possession Orders**". The Fourth Defendant in the Earlier Proceedings, Adam Parker, attended the hearing and made submissions to the effect that he was not occupying the Original Encampment and that he was not involved in the SLZG Protests. In view of this, the Claimant did not proceed with its claim against Adam Parker, and the Deputy Master made an order to that effect in respect of the claim against that individual.
9. In the Earlier Proceedings, I made a witness statement dated 25 July 2024 (the "**Earlier Statement**") in support of the Claimant's claim for possession of the Yellow Land and the Orange Land. In the Earlier Statement, I set out details of:
 - 9.1 the Claimant's interest in the land which was the subject of those proceedings,
 - 9.2 SOAS' lease of part of that land,
 - 9.3 the Defendants' trespass upon the Claimant's land,
 - 9.4 the Claimant's rules and regulations regarding meetings and other activities upon its premises,

- 9.5 the Claimant's decision-making processes regarding the initiation of Court proceedings, and
- 9.6 the serious effects (both financial and otherwise) that the Defendants' continuing trespass was having upon the Claimant.
10. Much of what I said in my Earlier Statement remains relevant in the context of these proceedings. I am told by Pinsent Masons that Rule 32.12(1) of the Civil Procedure Rules, which govern the conduct before the Court of civil proceedings such as these, provides that, except as provided by Rule 32.12 itself, a witness statement may be used only for the purpose of the proceedings in which it was served. Again, I was told by Pinsent Masons that one of the exceptions is where the maker of the witness statement gives his or her consent in writing to some other use of the witness statement. By this statement, I give my consent to the use of my Earlier Statement in these proceedings.
11. The use of the Earlier Statement in these proceedings will, hopefully, mean that I do not have to rehearse in detail matters which have already been fully addressed in my Earlier Statement. It is also hoped that the Earlier Statement will give the Court a sense of the "*full picture*" of the Defendants' continuing course of conduct.
12. The Earlier Statement was served on the Defendants to the Earlier Proceedings on 30 July 2024, together with, amongst other things, the Claim Form and Particulars of Claim. Despite knowing, since 30 July 2024 at the very latest, that their protests are taking place upon land belonging to the Claimant, not SOAS, and that these protests amount to a trespass upon the Claimant's land, as the Claimant's consent has never been sought or given, the protests have continued. Further, since in or around early October 2024, the Defendants have also begun protesting, under the banner of "Democratise Education" but in conjunction with the SLZG, against SOAS' disciplinary policy and its response to students involved in the SLZG Protests (the "**Democratise Education Protests**"). I expand on the Democratise Education Protests below.

THE FIRST, SECOND AND THIRD DEFENDANTS

13. This witness statement has exhibited to it a number of images of the Defendants trespassing and carrying out their protest activities upon the Land. In particular, the First, Second and Third Defendants appear in many of them. I think that it is fair to describe the First, Second and Third Defendants as the principal organisers of both the SLZG and the Democratise Education Protests. The First, Second, and Third Defendants appear frequently in the videos posted by the Instagram accounts associated with these two movements, namely

@soasliberatedzone and @democratise.education. They are often seen using megaphones to address crowds of unidentified individuals.

14. In order to assist the Court in identifying the First, Second and Third Defendants more easily in those images, exhibit "**AJ1**" contains an image of the three of them sitting on seats in Byng Place, London, outside the Church of Christ the King. The faces of each of the First, Second and Third Defendants have been circled in a different colour and the key beneath the image explains by reference to the coloured circle who each of them is.
15. I am informed by Matthew Grigson, the Claimant's Director of Governance, Policy and Compliance, that he has been advised by Brian Jordan, SOAS' Governance Improvement Lead, that the First Defendant has since been expelled as a student of SOAS and that the Second and Third Defendants are presently suspended whilst an investigation is undertaken (although the subject matter of that investigation has not been communicated to the Claimant).

THE FEDERATION OF LONDON UNIVERSITIES

16. I mentioned "federation members" in paragraph 1 of this witness statement. This is a reference to the 17 higher education institutions which collaborate as members of a federation (the "**Federation**"). Please see paragraphs 5 to 12 of my Earlier Statement in which I set out more information about the Federation. I also set out, in those paragraphs, how various members of the Federation had also been subjected to trespassory protest action similar to that which was suffered (and is being suffered) by the Claimant and the proceedings issued by those members in response to the same.

THE CLAIMANT'S INTEREST IN THE LAND

17. The Land in respect of which the Claimant is seeking relief in these proceedings is shown on the plan, which was prepared for the Claimant by Pinsent Masons, at exhibit "**AJ2**" (the "**Plan**") shaded, hatched and crosshatched in yellow and cross hatched orange, aqua, blue, green, purple and red.
18. The Claimant is registered at HM Land Registry as the freehold proprietor of all of the Land, albeit under numerous different title numbers. I understand that, in preparing the Plan, Pinsent Masons have excluded from the Land all those areas which are the subject of other occupational interests. The Land, together with those excluded areas, is the "Site", as more particularly defined in the Particulars of Claim.
19. In other words, the Land comprises the parcels of land to which the Claimant has an immediate right to possession. The Land comprises the following parcels of land:

- 19.1 Those parts of title number 325806 which are shown shaded yellow, cross hatched yellow and hatched yellow on the Plan (the "**Yellow Land**"). Copies of the official copy of the register of title and the title plan for the land in title number 325806 can be found at exhibit "**AJ3**".
- 19.2 Those other parts of title number 325806 and which are shown cross hatched orange on the Plan (the "**Orange Land**"). The Orange Land comprises the pedestrianised precinct areas of Torrington Square, which can be used to gain access to a number of buildings on the Site, including Senate House. Indeed, this is how the Defendants gained access to Senate House on 27 May 2024 in order to try and disrupt a meeting being held by the Board of Trustees of SOAS (which was being held in a room provided to them by the Claimant). That incident is described in paragraph 34.3 of my Earlier Statement, with photographs of that incident appearing at exhibit "**AJ13**" to that statement. The Yellow Land and the Orange Land were the subject of the Possession Orders.
- 19.3 The other parts of title number 325806 and which are shown cross hatched aqua on the Plan (the "**Aqua Land**"). These areas consist principally of car parks and an access road.
- 19.4 The garden of Gordon Square, London, in registered title number LN91321 shown cross hatched blue on the Plan (the "**Blue Land**"). Copies of the official copy of the register of title and the title plan for the land in title number LN91321 can be found at exhibit "**AJ4**".
- 19.5 The gardens known as Malet Street Gardens, London, in registered title number LN94166 shown cross hatched green on the Plan (the "**Green Land**"). Copies of the official copy of the register of title and the title plan for the land in title number LN94166 can be found at exhibit "**AJ5**".
- 19.6 The land at Woburn Square, London, in registered title number NGL376460 shown cross hatched purple on the Plan (the "**Purple Land**"). Copies of the official copy of the register of title and the title plan for the land in title number NGL376460 can be found at exhibit "**AJ6**".
- 19.7 Part of the land in registered title number LN179751 shown cross hatched red on the Plan (the "**Red Land**") located at 52 to 60 Gower Street, London and which is known as Bonham Carter and Warwickshire House. Copies of the official copy of the register of title and the title plan for the land in title number NGL179751 can be found at exhibit "**AJ7**". These premises had previously been used by the Claimant as student halls of residence. However, these premises are vacant and in the process of being decommissioned so that the Claimant can refurbish them and bring them back into use as part of its estate. These premises are in close proximity to the building occupied by SOAS, which has been the main target of the Defendants' protest activities to date. For this reason, the Claimant reasonably believes that

the Defendants could seek to occupy these premises in the event that their Third Encampment (referred to below) is dispersed or, alternatively, as the weather becomes inclement during the autumn and winter months.

SOAS' LEASE OF PART OF THE SITE

20. It is convenient here to mention SOAS' interest in part of the Site once more. One of the buildings on the Site, which is known as the North Block, has been demised to SOAS by the Claimant. I dealt with this, in detail, at paragraphs 16 to 18 of my Earlier Statement.
21. The North Block is situated immediately adjacent to the part of the Yellow Land known as the 4th Quadrant. I mention it again in this witness statement as the Defendants' continuing trespasses on the Yellow Land have focused upon the North Block, which is where SOAS' Vice-Chancellor, Professor Adam Habib, also has offices and against whom the focus of the Defendants' protest is often directed as he is the "*face of SOAS*".

ORDINANCE 24, 'THE CODE OF PRACTICE FOR MEETINGS AND OTHER ACTIVITIES ON UNIVERSITY PREMISES'

22. I refer again to the Claimant's Ordinance 24, which is titled 'Code of Practice on Meetings or Other Activities on University Premises' (which I refer, together with the annexes thereto, as the "**Code**"), which I dealt with in paragraphs 19 to 23 of my Earlier Statement. The Code is at exhibit "**AJ5**" of that statement.
23. It is worth mentioning again that the Code was promulgated in order for the Claimant to comply with its duties under section 43 of the Education (No.2) Act 1986 as regards the taking of steps which are reasonably practicable to ensure that freedom of speech is secured for members, students and employees of the Claimant and for visiting speakers to any of the Claimant's premises, including the Land.
24. The Code applies to meetings and other activities in respect of which there is a real risk of the Claimant being unable to carry out its legal obligations, including its obligations to secure participants' safety, to avoid public disorder and breaches of the peace. The Code sets out the procedure to be followed in respect of such meetings and activities. This procedure involves proposed meeting or activity being notified to the Claimant's appointed officer (the "**Appointed Officer**") in advance, which permits the Claimant the opportunity to carry out a specific risk assessment and, having done so, either grant or refuse permission (or grant permission subject to conditions). There are a number of Appointed Officers, of which I am one. The others are Rita Akushie (Pro Vice-Chancellor (Finance and Operations)) and Emma

Rees (Executive Director of Property and Estates). Notification under the Code may be made to any one of us.

25. As before, in these proceedings, the Claimant does not believe that any of the Defendants are its registered students.
26. I confirm that no steps have been taken by the Defendants in accordance with the Code of Practice to seek the consent of the Claimant for the activities which have been and are continuing to take place on the Yellow, Orange, and Purple Land. I return to this immediately below.

OCCUPATION OF THE ORIGINAL ENCAMPMENT ON THE CLAIMANT'S LAND WITHOUT THE CLAIMANT'S LICENCE OR CONSENT

27. In paragraphs 24 to 32 of my Earlier Statement, I explained how the Defendants had unlawfully set up a protest encampment on the 4th Quadrant. The 4th Quadrant forms part of the Land (specifically, the Yellow Land). The 4th Quadrant is an open area which has been laid to lawn.
28. By way of brief overview, however, the 4th Quadrant was first occupied by the Defendants on 6 May 2024. The 4th Quadrant – like the rest of the Land – is not subject to any leases or any other proprietary interests or occupational licences. Accordingly, there is no one, other than the Claimant, who could have given the Defendants the right to occupy the 4th Quadrant.
29. Further, the Land (including the 4th Quadrant) is not subject to any public rights of way. Rather, visitors to the 4th Quadrant (and the Land more generally) are required to comply with the Visitor Regulations promulgated by the Claimant. True copies of the Visitor Regulations are exhibited to the Earlier Statement (at exhibit "AJ6" of that statement) and appended to the Particulars of Claim in these proceedings. Regulation 15.2 of the Visitor Regulations imposes an obligation on anyone proposing to demonstrate on any part of the Claimant's land (including the Land) to notify the Claimant's Head of Hospitality and Conferencing Services at least 72 hours in advance.
30. I have already referred above (and in the Earlier Statement) to the Code, which is of particular relevance in cases of protest activity.
31. The Defendants did not comply with either the Visitor Regulations or otherwise seek the Claimant's consent pursuant to the Code before entering the 4th Quadrant, establishing the Original Encampment, and carrying out protests thereon. Accordingly, the Defendants did not have the Claimant's licence or consent to enter, or remain upon, the 4th Quadrant.

32. To cover any eventuality that the Defendants might seek to argue that they had been granted some form of express or implied licence to remain on the Claimant's land (which was not the case), the Claimant gave the Defendants notice, by a letter dated 19 July 2024 and appearing at exhibit "**AJ23**" to the Earlier Statement, that any such licence was terminated with immediate effect and that they were required to vacate the land. The Defendants failed to do so.
33. For these reasons, the establishment, and continued presence thereafter, of the Original Encampment therefore amounted to an unlawful trespass on the Claimant's land.
34. I have referred, above, to this encampment as the "Original Encampment". This is because, unfortunately, following the making of the Possession Orders by Deputy Master Rhys in the Earlier Proceedings, the Defendants unlawfully set up a second encampment (the "**Second Encampment**") on another part of the Land, followed by a third encampment (the "**Third Encampment**") on land at Byng Place outside Church of Christ the King. These further encampments are addressed in more detail below.

THE SECOND ENCAMPMENT: FURTHER OCCUPATION OF THE CLAIMANT'S LAND WITHOUT ITS LICENCE OR CONSENT

35. On 31 July 2024, the Claimant agreed with the First, Second, and Third Defendants that, although the Possession Orders provided for possession to be given to the Claimant forthwith, the Claimant would not seek to enforce the Possession Orders until after 5 August 2024. The First, Second, and Third Defendants had requested some additional time to allow them to collect and gather their belongings.
36. Thereafter, the Original Encampment dispersed, and the Defendants gave up possession of the Yellow Land without the Claimant needing to take any enforcement action. However, the Defendants immediately set up the Second Encampment on another parcel of land belonging to the Claimant at Woburn Square, London – namely, the Purple Land. The Purple Land, upon which the Second Encampment was established, was not the subject of the Possession Orders.
37. At exhibit "**AJ8**" is a Google Earth image on which has been marked in red all three of the Defendants' protest encampments. The location of the Second Encampment is marked in red with the number "2.0".
38. With regard to the Second Encampment, exhibit "**AJ9**" contains a series of images taken from the Instagram account @soasliberatedzone. The images show that the Second Encampment was set up on or around 5 August 2024 (see date contained in the fourth image

in exhibit "**AJ9**"). Other images show Persons Unknown moving from the Original Encampment, on part of the Yellow Land, to the site of the Second Encampment on the Purple Land. Please see, in particular, the fifth image (which has been taken looking towards the site of the Original Encampment), as well as the sixth and seventh images in this exhibit.

39. The Third Defendant has been circled in green in the eighth, ninth and tenth images in exhibit "**AJ9**". She is addressing the Persons Unknown at the Second Encampment. Her words appear in the images. She says as follows:

39.1 "*The first university in the UK to resist eviction by relocating ... but we are here to say*" (eighth image);

39.2 "*we are here to stay*" (ninth image); and

39.3 "*and we will continue to disrupt and escalate at SOAS*" (tenth image).

40. The eleventh image is a post which contains the words "*If they move us, we'll find a new spot ... We'll apply the snail technique (continuous spiral movement) until they go crazy!*"

41. There are a number of things I would like to say at this juncture about the statements made by the Third Defendant to the Persons Unknown who can be seen in the images of the Second Encampment and also the words in the eleventh image recited in paragraph 40. They are as follows:

41.1 Firstly, the Possession Orders which were obtained by the Claimant in the Earlier Proceedings included areas of land extending beyond the area of land occupied by the site of the Original Encampment on the 4th Quadrant. In addition to two small areas also edged yellow (upon which the Defendants had erected a gazebo and constructed a stage/dais out of wooden pallets), the Claimant also sought, and obtained, possession of the Orange Land, being the pedestrianised precinct areas of Torrington Square. Taken together, the Yellow Land and the Orange Land approximately form the shape of a crucifix.

41.2 Prior to the issue of the Earlier Proceedings, it had been anticipated that, if the Claimant restricted its claim for possession only to the Yellow Land, being the land upon which the Defendants were trespassing at that time, then the Defendants would simply decamp to another part of the Claimant's land. The Claimant reasonably believed that the Orange Land represented the most likely site for any further encampment, given that it is a relatively large open, pedestrianised area in close proximity to, and indeed contiguous with, the site of the Original Encampment. Upon the advice of the Claimant's legal advisers, the Claimant restricted its claim to possession of the Yellow Land and the Orange Land. The Claimant did

not seek a "*campus wide*" order for possession in respect of the entirety of the Land, including the Blue, Green, Red, Purple, and Aqua Lands. This was because, at that point in time, there was a concern that the Court might not have been prepared to make such a wide-reaching order.

- 41.3 However, and secondly, the Defendants' conduct following the obtention of the Possession Orders has shown that the Claimant's concerns about relocation were wholly justified. As referred to further below in this statement, the Third Defendant's statements (referred to in paragraphs 39.2 and 39.3 above, and the words in the eleventh image) have indeed been borne out, as the Defendants have stayed (whilst the Third Encampment is not on the Claimant's land, it is only a few hundred yards away) and have continued, and are continuing, "*to disrupt and escalate at SOAS*". The Defendants have shown that they will "*find a new spot*".
- 41.4 Thirdly, the geography and location of Claimant's land and, in particular, the occupation by SOAS of buildings on and around that land inevitably means that, if the Defendants are to continue their 'disruption' and 'escalation' – as is their openly stated intention – then this will inevitably result in further protest activities on the Claimant's land. I have addressed this concern in more detail at paragraph 49 below.
- 41.5 Hopefully, the above helps explain why the Court is being invited to grant relief in respect of the whole of the Land.
42. The Defendants did not take any steps to comply with either the Visitor Regulations or the Code before establishing the Second Encampment on the Purple Land. For the reasons explained above in relation to the Original Encampment, the Defendants did not have the Claimant's consent or licence to enter or remain on its land for the purpose of protesting. Hence, the establishment and, while it was in situ, the presence of the Second Encampment constituted a further continuing act of trespass by the Defendants on the Claimant's land.
43. I intimated above that the Defendants were no longer located at the Second Encampment and that in fact they were now in occupation of the Third Encampment at Byng Place. The background to that relocation is set out below.
44. When the Defendants relocated their encampment to the Purple Land and established the Second Encampment, the Claimant decided to exercise its common law remedy of self-help by instructing a firm of High Court Enforcement officers called Shergroup to attend at the Second Encampment in order to evict them. As explained above, the area of land upon

which the Second Encampment was established, the Purple Land, was not covered by the Possession Orders.

45. The final image in exhibit "**AJ9**" is an image of Shergroup attending the site of the Second Encampment on or around 7 August 2024 in order to evict the Defendants from the Purple Land. Although the Shergroup operatives managed to disperse the Second Encampment, the Defendants declined to vacate the land voluntarily. I was advised by Pinsent Masons that the use of reasonable force is permitted when exercising the remedy of self-help. The image shows the number of operatives required in order to evict one protestor who seeks to resist. For the safety of the protestor and the operatives, at least four people are required, with one to hold each limb securely in order to effect a safe removal of an individual.

THE THIRD ENCAMPMENT AT BYNG PLACE

46. After the Second Encampment was dispersed, the Defendants set up the Third Encampment in Byng Place outside the Church of Christ the King. As noted in paragraph 13, exhibit "**AJ1**" contains an image of the First, Second and Third Defendants sitting on seats at the Third Encampment. Exhibit "**AJ10**" contains further images of the Third Encampment. In particular, I would draw the Court's attention to the fourth and following images in this exhibit which are part of an Instagram video known as a "reel" in which the First and Third Defendants along with Persons Unknown can be seen. The caption to the post shown in the fourth image sets out complaints about the Claimant exercising its remedy of self-help to remove the Defendants from the Second Encampment before going on to set out the Defendants' intention to relocate to what is now the Third Encampment in order to sustain their encampment. The text confirms that the Defendants do not intend to cease their activities. It states that "*They will not stop us.*"
47. The other image is a transcript of what the Third Defendant is saying as she addresses the camera. She says: "*SOAS Liberated Zone for Gaza This morning ... we were evicted from the last location we were at ... so we relocated once again ... to show that we will continue the struggle ... we will continue to hold the University of London ... but specifically soas accountable ... for their complicity in the ongoing genocide in Gaza- ... and until divestments are made ... we will continue to fight for Palestinian liberation.*" This statement again demonstrates the Defendants' intention to continue their protest activities which will inevitably involve further unlawful trespass upon the Land of the Claimant.
48. The Claimant believes that the land upon which the Defendants have set up the Third Encampment belongs to the local authority, the London Borough of Camden ("**Camden**"). At present, the Claimant does not know what Camden's planned response to the Third Encampment is.

49. The Third Encampment is adjacent to the Land. At present, the Defendants are, essentially, using the Third Encampment as a "base" from which to organise and mobilise protests on the Claimant's adjacent land. As set out above, the Defendants' protests are directed at SOAS, and typically take place outside premises occupied by SOAS, such as the Paul Webley Wing (which is known as the North Block). Not only do the Defendants, almost inevitably, have to enter upon land belonging to the Claimant in order to gain access to these buildings, but the external areas of these buildings are not demised to SOAS and, instead, form part of the Land. Hence, any protests by the Defendants which have been – or will be – staged outside buildings occupied by SOAS have involved, and will involve, an unlawful trespass upon land belonging to the Claimant.

ACTIVITIES AND INCIDENTS FOLLOWING THE SETTING UP OF THE THIRD ENCAMPMENT BY THE DEFENDANTS

50. As set out immediately above, although the Third Encampment is not located on the Claimant's land, the Defendants' protests activities are not confined to the Third Encampment itself. Rather, in the period since the Third Encampment was established, the Defendants have carried out a number of trespassory protests on the Claimant's land.
51. Exhibit "**AJ11**" contains images of activities and incidents which have occurred on the Claimant's land since the Second Encampment was dispersed and the Defendants set up the Third Encampment on Byng Place.
52. The images are primarily screenshots of footage recorded by the body cameras worn by the security personnel of the Claimant. They have been arranged in chronological order in the exhibit and are accompanied by a narrative which explains what can be seen in the image. I have sought to summarise the activities of the Defendants which are shown in those images in the paragraphs below.
53. Some of those images show the fencing erected by the Claimant around the site of the Original Encampment on the 4th Quadrant and around the site of the Second Encampment which had been located on part of Woburn Square. It is hoped that the fencing deters the Defendants from returning to the fenced-off parts of the Land in the event that they are evicted from the Third Encampment by Camden.
54. As the Land consists only of those areas in respect of which the Claimant has an immediate right to possession (and has not therefore demised to another institution), the Land consists mainly of parcels of open land, which are interspersed by various buildings. By the last 11 images in exhibit "**AJ11**", the Claimant has sought to give a virtual walking tour of that part of

the Land which is currently the main focus of the Defendants' protest activities and unlawful acts of trespass upon the Claimant's Land, namely the Orange Land.

55. However, and for the avoidance of doubt, it would not be practicable to fence off completely or otherwise secure the Land and/or install security permanently at all the entrances and exits.
- 55.1 In the first place, the images in the virtual tour show that there are already a number of gates allowing access and egress to these parts of the Land. However, the Claimant, SOAS, and Birkbeck all have premises on these parts of the Site. Accordingly, there are large numbers of people who require daily access to these areas for the entirely lawful purposes of, for example, work, study, and attendance at events (such as conferences). If, for example, additional fencing was erected and security guards were required to check visitor IDs and/or enquire as to the purpose of their visit, then this would create unworkable delays and congestion, which would be a particular problem for students and academic staff members seeking to gain access to adjacent buildings for, say, lectures and other classes.
- 55.2 Secondly, it is likely that maintaining this degree of security presence would prove disproportionately expensive. Mr Glenn Marree is the Claimant's Director of Facilities Management, and part of his role involves the oversight of matters such as security and the budget for the same. He has advised me that, if the Claimant were to arrange for the two main entrances to Torrington Square from Malet Street and Thornhaugh Street respectively to be, effectively, manned around the clock, then this would most likely require 8 full-time personnel to be employed by the Claimant. Based on market rates for security services and the 12-hour shift patterns worked by those in the security shifts that we run for a 48-hour week, it is likely that this would cost around £50,000 per annum per security guard, equating to some £400,000 per annum. The Claimant is a charity whose main function is the provision of higher education and higher education facilities. If the continuing and threatened unlawful actions of the Defendants are not restrained by this Court, the Claimant would therefore have to expend a very significant sum of money, £400,000 per annum, in order to secure just two points of access onto the Land.
56. Other images show a number of the Defendants on the Orange Land outside premises occupied by SOAS. I should add that these are a selection of images as this sort of transient protest action occurs very frequently, and often daily. Where these protests take place, the Defendants typically remain outside those premises, beating a drum and shouting slogans. These slogans typically involve berating SOAS' involvement and investments in Israeli entities, as well as Professor Adam Habib, the Vice-Chancellor of SOAS..

57. There is also a series of images showing the First, Second and Third Defendants on a raised part of Torrington Square, being the Orange Land, which they use in a manner akin to speakers or protestors at Speaker's Corner in Hyde Park. They address those passing by using a megaphone.
58. Exhibit "**AJ12**" contains images from the Instagram account for the SLZG. It contains advertisements for protest activities with which the Defendants are involved and in which they have encouraged and continue to encourage others to participate. It is clear from these images that participation in the planned events inevitably involves trespass upon the Claimant's land. For example, there are a number of images relating to a protest which took place on 5 September 2024 during SOAS graduation ceremonies. This protest caused disruption to these ceremonies. Although the graduation ceremonies were taking place within premises demised to SOAS and other premises, the Defendants' protest took place outside these buildings on the Claimant's land – specifically, the raised area of Torrington Square outside the North Block, which forms part of the Orange Land. In these images, the First, Second, and Third Defendants can be seen, along with Persons Unknown.
59. A further protest took place on 27 September 2024. This mass protest was scheduled to coincide with SOAS' Freshers' Fayre for its new intake of students at the beginning of the 2024/2025 academic year. However, due to fears of what might occur during the protest and in order to reduce the risk of confrontation, SOAS cancelled its Freshers' Fayre.
60. The advertisements for this mass protest appear in exhibit "**AJ12**". The mass protest took place notwithstanding SOAS' cancellation of its Freshers' Fayre and took place on the Orange Land of the Claimant. None of the Defendants sought the Claimant's permission or consent to hold this protest upon the Land (whether pursuant to the Code, the Visitor Regulations or otherwise), such that this constituted an unlawful trespass. The first image of the mass protest on 27 September 2024 which appears in exhibit "**AJ12**" states ominously and presciently that the protest is the "*First protest of the academic year!*". The speaker addressing the protestors with a megaphone is standing on the raised part of the Orange Land.
61. The second, third and fourth images of the mass protest on 27 September 2024 are screenshots from a video. I apologise for the fact that, as the camera was being panned by one of the Defendants rather quickly, the images are not crystal clear. However, the second image shows a large number of Persons Unknown trespassing upon Torrington Square which is part of the Orange Land. The fencing erected by the Claimant, which I have referred to above, can be seen behind them. The North Block is also visible.

62. The third image shows more Persons Unknown trespassing on the Orange Land. The building in the background of this image is the SOAS Brunei Gallery, which is adjacent to the 4th Quadrant. The SOAS Brunei Gallery is demised to SOAS by the Claimant. The fourth image shows yet more Persons Unknown taking part in the mass protest on 27 September 2024. They are outside the SOAS library which is another set of premises let on a lease by the Claimant to SOAS.
63. Exhibit "**AJ12**" also contains images of an advertisement for a protest event which took place on Thursday 3 October 2024. The location of the protest was not advertised as being Byng Place (the location of the Third Encampment), but rather the "*SOAS Campus*". The images accompanying the advertisement which was in the form of a video includes images of the First, Second, and Third Defendants each addressing Persons Unknown from the raised part of the Orange Land at a protest prior to 3 October 2024. Again, the Claimant's consent to the protest on 3 October 2024 was not sought by any of the Defendants. The protest event hence involved another unlawful trespass upon the Orange Land.
64. I have already referred, above, to the Democratise Education Protests. On 2 October 2024, the Instagram accounts @soasliberatedzone and @democratise.education co-authored a collaborative post advertising the protest event on 3 October 2024. The "reel" advertising the protest bears a badge in the top-left corner which states, "Democratise Education End SOAS Repression". It is not clear when this footage advertising the 3 October 2024 protest was recorded, but I assume that it was recorded during the mass protest on 27 September 2024. This protest event was not directly related to SLZG's "*Boycott, Divestment, and Sanctions*" protest; rather, the main focus of this event appears to have been on an allied movement or cause, namely protesting SOAS' stance in relation to freedom of speech, its dismissal of student union representatives (of which the First Defendant was one), and lobbying for the dropping of disciplinary action against its students taking part in the SLZG Protests. It will be recalled from paragraph 15, above, that the First Defendant has been expelled as a student of SOAS, and that the Second and Third Defendants have been suspended whilst under an investigation by SOAS.
65. Exhibit "**AJ12**" also contains an image advertising a protest which took place on Saturday 5 October 2024. The second image of the advertisement is of the meeting point on Byng Place, the location of the Third Encampment. It is noteworthy how close this meeting point is to the Orange Land. The organisers of this protest event had issued a warning to those proposing to attend the event that there was to be a "*HEAVY POLICE PRESENCE, PLEASE BE CAUTIOUS*".

66. Exhibit "**AJ12**" also includes a photograph of the protest march which took place on 5 October 2024. This is a screenshot of an Instagram "reel" published by an Instagram account for an organisation calling itself "*Birkbeck for Palestine*". Circled in red is a banner of the SLZG which suggests that some or all of the Defendants took part in this march. Banners from Goldsmiths, University of London and Portsmouth University can also be seen.
67. The sign on the building pictured in the background, which has been circled in yellow and reads "*Birkbeck College Clore Management Centre*", confirms that the protest march had just set off from the Third Encampment on Byng Place (a clearer photograph of the sign is included in Exhibit "**AJ12**"). This building is located on the Site, adjacent to the Orange Land. Hence, all of the persons shown in the image of this protest march are Persons Unknown who were unlawfully trespassing on the Orange Land.
68. The final images in exhibit "**AJ12**" are of an advertisement for a rally on 10 October 2024 which was scheduled to begin at 12.30pm. That rally took place as the following three images are of Persons Unknown attending that rally. The "*infamous steps*" to which reference is made in the caption to these three images can be seen in the last of those three images. Those steps in fact form part of the land and buildings which are let to SOAS by the Claimant and which house SOAS' library. The Persons Unknown who can be seen in the other two images are standing on Torrington Square which is part of the Orange Land. Those Persons Unknown were therefore trespassing upon the Claimant's Land when they were taking part in the rally on 10 October 2024.
69. The chronological account above indicates that the frequency of the Defendants' protest activities appears to be increasing. This is entirely consistent with the Defendants' avowed and openly stated intentions. It also appears that the Defendants do not have any intention of seeking the Claimant's permission or consent to carry out their protest activities on the Land. The Defendants have acted in total disregard of the Claimant's ownership of, and rights in and over, the Land. Their protest activities on the Land constitute an unlawful trespass. It is clear that unless the Court is persuaded and willing to grant the relief sought by the Claimant, the Defendants will continue to behave in this unlawful manner.
70. Indeed, this Defendants' defiant stance can be seen from the numerous posts published by the Instagram account @soasliberatedzone, which is operated by some or all of the Defendants, since the Third Encampment was established. For example:
- 70.1 On 11 August 2024, the account published a video, featuring the First and Third Defendants, in which an unknown speaker can be heard saying '*we will not stop until they divest, and we will not stop until Palestine is liberated*' and '*disclose, divest, we will not stop we will not rest*'.

The caption to this post includes the following statement: *'this is why we fight. This is why we relocate and we continue with the SOAS liberated zone for Gaza [...] We will continue to hold them accountable and escalate'*. Images of the speaker can be seen in the first, second, and third images for 11 August 2024 in exhibit "**AJ11**" and the caption to the post can be seen in the fourth image.

- 70.2 On 18 August 2024, the account published a video, featuring the First, Second, and Third Defendants, of a protest outside the London offices of The Guardian in London which took place the day before, 17 August 2024. The Third Defendant can be seen saying that *'they thought that these encampments were just a small point in student history...but we are here to say that we will stay...we will stay until our demands are met...we will continue to organise and mobilise, specifically we are ready for the new academic year'*. The First, Second and Third Defendants appear in the first image for 17 August 2024 in exhibit "**AJ11**". The second image for that date is a screenshot of the Defendant as she speaks the words which are transcribed above.
- 70.3 On 27 September 2024, the account published a video of the mass protest which had taken place that day, accompanied by a caption which stated that *'we will not stop until SOAS STOPS THE COMPLICITY. Come and join us'*. Please see the second image of the images for 27 September 2024 contained in exhibit "**AJ12**".
71. As with the images in exhibit "**AJ11**", those in exhibit "**AJ12**" have been placed in chronological order and are accompanied by a written narrative.

ISSUES WHICH HAVE BEEN CAUSED BY THE ACTIVITIES AND INCIDENTS INVOLVING THE DEFENDANTS

72. In paragraphs 35 to 45 of my Earlier Statement I had set details of a number of serious issues which the actions of the Defendants had caused as a result of their trespass upon the land of the Claimant, including, briefly:
- 72.1 instances of fear, intimidation, physical assault and criminal damage, such as persons being wary of visiting the SOAS Brunei Gallery because of an altercation with the Defendants, a physical assault on a security guard, and graffiti applied to the pavement of the Orange Land and the walls of the North Block;
- 72.2 concerns over health and safety matters, as the Original Encampment was blocking a fire escape route, the Original Encampment did not have any sanitation facilities, and the occupants of the Original Encampment were using open flames on cooking appliances in the vicinity of the tents and other flammable materials;

- 72.3 additional cleaning costs (at that time, £4,500) associated with the removal of graffiti; and
- 72.4 increased security costs (at that time, just under £50,000).
73. As the Third Encampment is not located on the Claimant's land, these issues are not, at present, ongoing. However, the Claimant is concerned that, if a further encampment were to be established on the Claimant's land, then it is likely that these issues would reoccur.
74. Further, notwithstanding that the Third Encampment is located on land belonging to Camden, the Claimant continues to suffer loss and harm by reason of the Defendants' continuing trespassory protests. At present, the main issue is the loss of time and resources engendered by the diversion of the Claimant's staff (including its in-house legal team, its facilities management and security teams, and its senior management team and operational staff) away from their day-to-day responsibilities to reviewing, considering, containing, and planning for the Defendants' repeated acts of trespass.
75. In addition to the above, the Claimant is continuing to incur significant costs in connection with securing the Land as best it can against the unlawful actions of the Defendants. To date, the Claimant has incurred additional costs in the sum of £156,863.70.
76. Invoices from London Security Services (UK) Limited ("**LSS**") in the total sum of £38,784.90 and Shergroup in the sum of £118,078.80 appear in exhibit "**AJ14**". LSS are an external supplier of security services to the Claimant. LSS have been providing services in the form of additional security personnel since the establishment of the Original Encampment. Shergroup has assisted the Claimant in evicting the Defendants from their Second Encampment using the common law remedy of self-help. Further, following the dispersal of the Second Encampment, Shergroup also provided additional security services to supplement the Claimant's own security team. As noted in paragraph 55.2, the Claimant is a charity whose main function is the provision of higher education and higher education facilities. The Claimant can ill afford the significant expenditure that it is being forced to incur on additional security measures to deal with the continuing unlawful acts of trespass of the Defendants.
77. Exhibit "**AJ14**" also includes an invoice dated 30 September 2024 from Cam Specialist Support Limited in the sum of £1,818.60 for work that company carried out in removing graffiti from the paved area in Torrington Square (the Orange Land) in August 2024 after the Defendants had given up occupation of the Original Encampment following the making of the Possession Orders.
78. The protest activities of the Defendants involving as they do on each occasion a trespass upon the Claimant's land do give cause for concern that they will interfere with events of third

parties who are permitted to use parts of the Claimant's Land. The following are examples of those who are permitted to use parts of the Claimant's Land:

- 78.1 The Bloomsbury Farmers' Market is held every Thursday between 9.00am and 2.00pm on Torrington Square (this is the Orange Land) with stall holders, students and employees of the universities in the vicinity such as SOAS and Birkbeck, and members of the public visiting the market.
- 78.2 The Metropolitan Police (the "**Police**") has a long-term booking of 18 conference rooms in both Senate House and Stewart House which are located on the Site. This means that members of the Police will be accessing the Land to attend training events on the Site on regular occasions between now and at least 28 March 2025, with the force currently negotiating a further contract until 19 December 2025.
79. It is difficult to say with precision just how many people enter onto the Land lawfully on a daily basis. They could easily number thousands of people every weekday. It is likely that, on a daily basis during the week, there could be as many as 500 members of the Police attending the training events referred to in paragraph 78.2 above. In addition, visitors to the buildings used by the Claimant on the Land could exceed 1,100 on a daily basis. The latter figure includes staff members, students, and other third parties (the Claimant's Deputy Librarian, Pete Williams, has advised me that there were 538 daily visits to Senate House Library between 1 August 2023 and 31 July 2024). This is likely to be a conservative estimate as it does not include those visiting, for example, the farmers' market referred to in paragraph 78.1 or those who are visiting other institutions who occupy premises on the Land (e.g. SOAS and Birkbeck). The protest activities of the Defendants, involving as they do an unlawful trespass upon the Land, have the capacity to bring into conflict the Defendants and those lawfully visiting the Land.

THE CLAIMANT'S DECISION TO BRING THESE PROCEEDINGS

80. In paragraph 33 of my Earlier Statement, I referred to the Claimant's business continuity plan and, in paragraphs 49 to 52 of that statement, I set out details of the Claimant's decision-making process by which it took the decision to issue the Earlier Proceedings.
81. Meetings of the Gold team were convened to consider the relevant facts and matters relating to the continued trespass upon the Claimant's land by the Defendants despite the Possession Orders. Having considered those facts and matters the Gold team resolved to give the relevant authority to bring these proceedings against the Defendants. Exhibit "**AJ13**" contains a copy of the minutes giving authority to bring these proceedings.

ATTEMPTS TO IDENTIFY THE DEFENDANTS

82. The Claimant is cognisant of its obligation to attempt to identify persons unknown who are trespassing upon its land and, to this end, I consider that it has used reasonable endeavours to do so.
83. I set out, at paragraphs 53 to 59 of my Earlier Statement, how the Claimant had attempted to identify the defendants to the Earlier Proceedings were set out in. I consider that those reasons were equally applicable when considering whether the Claimant was able to identify those who should be defendants to these proceedings. The conclusions arrived at on this occasion were not different. It is only the identities of the First, Second and Third Defendants which are known to the Claimant.

THE RELIEF SOUGHT BY THE CLAIMANT: THE RISK OF CONTINUING TRESPASS ON THE CLAIMANT'S LAND TO FURTHER THE DEFENDANTS' PROTEST ACTIVITIES AND RELOCATION OF THE THIRD ENCAMPMENT TO THE LAND IF IT IS DISPERSED

84. The Claimant is concerned that, without the grant by the Court of the relief that is being sought, there is a real and imminent risk that the Defendants will continue to trespass upon the Claimant's land in the furtherance of their protest. The Claimant is also concerned that there is a real and imminent risk that, if the Third Encampment were to be dispersed (whether by Camden or otherwise) or were otherwise to become unsuitable (because of, say, size constraints), then the Defendants will simply decamp and set up a further encampment on part of the Land belonging to the Claimant, particularly the grassy areas of Gordon Square (the Blue Land) and Malet Street Gardens (the Green Land).
85. There is a compelling need for precautionary injunctive relief. The Defendants have – vocally and openly – stated their intention to continue with their protest activity until SOAS accedes to their demands in respect of boycotting, divestment, and sanctions. They have already relocated their encampment twice and have made clear that they do not plan on leaving voluntarily. The Defendants have also posted rallying cries to the SLZG Instagram account, encouraging third parties to join their protests. Put simply, the Defendants' stance can best be described as defiant.
86. Despite the Claimant's attempts to prevent trespassory protests by erecting fencing and instructing additional security personnel, the SLZG Protests have continued, and the Democratise Education Protests have commenced. Indeed, the former appear to be increasing in frequency.

87. Further, the Claimant would suffer irreparable harm if these trespassory protests were to continue unrestrained and/or if a further encampment(s) were to be established on its land. At paragraphs 72 to 79 above, I have summarised the serious issues which the Claimant has been facing as a result of the Defendants' protest activity. The harm caused by these issues cannot be adequately compensated in money. For example:
- 87.1 The Defendants' protests have, to date, had a significant adverse impact on the student experience for the Claimants' students and/or students at other institutions, including those institutions which are the Claimant's tenants. As set out above, the Defendants disrupted SOAS graduation ceremonies in early September 2024, and the mass protest on 27 September 2024 forced SOAS to cancel its Freshers' Fayre. The Claimant cannot recover damages in respect of this intangible, non-pecuniary harm suffered by third parties.
- 87.2 The protests have, previously, led to violence and anti-social and other intimidating behaviour. By reason of the same, the Claimant's staff have suffered – and are at risk of suffering on an ongoing basis – harassment and/or aggression from some or all of the Defendants. This is another instance of a non-pecuniary harm for which the Claimant cannot be compensated in money, and the Claimant is anxious to ensure the safety of its staff.
- 87.3 If a further encampment were to be established on the Land, then this could pose a number of health and safety risks for the occupiers, as well as others in the vicinity. The Original Encampment and/or the Second Encampment posed a number of such risks, arising from – for example – the lack of any sanitation facilities and the use of open flames on cooking appliances in the vicinity of the tents and other flammable materials.
- 87.4 There is also a real risk of reputational harm, given that the buildings on the Claimant's land are used by both the Claimant itself and by third parties for hosting various events, such as conferences and summer schools. The Claimant reasonably believes that, if the protests were to continue and/or a further encampment were to be established on the Land, then there is a real risk of those who have already placed bookings being persuaded to cancel them or, alternatively, delegates or invitees may choose not to attend any events which do take place.
- 87.5 Since 6 May 2024, the Claimant has incurred significant additional costs associated with security and cleaning as a result of the protests. The Claimant is a provider of higher education and necessarily operates within stretched budgetary constraints. Despite this, the Claimant has been forced to divert its finite resources to responding to the protests. If this continues, this will inevitably have an adverse impact on the Claimant's available budget for student and/or staff services, something which would be likely to have a knock-on effect on both the student experience and the Claimant's reputation and standing.

UNDERTAKING IN DAMAGES

88. If the Court is minded to grant a precautionary interim injunction, then the Claimant is prepared to give an undertaking in the following terms: the Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the interim injunction has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss. I confirm that I have the requisite power and authority to provide this undertaking on behalf of the Claimant should the Court require such an undertaking to be given if it is minded to grant the relief sought by the Claimant.

CONCLUSION

89. In light of the contents of my witness statement and the evidence contained within it, I respectfully invite the Court to grant the relief that it is seeking in respect of the Land shown on the Plan.

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: Alistair Jarvis

Date: 11 October 2024

Signature:

A handwritten signature in black ink, appearing to be 'A. Jarvis', with a long horizontal flourish extending to the right.

Pro Vice-Chancellor (Partnerships and Governance) of the Claimant, the University of London

SCHEDULE 1 – THE LAND

The Land is shown on the plan at Exhibit "AJ2" (the "**Plan**") which comprises the following parcels of land:

1. Those parts of title number 325806 which are shown shaded yellow, hatched yellow and cross hatched yellow on the Plan;
2. Those other parts of title number 325806 and which are shown cross hatched orange on the Plan;
3. The other parts of title number 325806 and which are shown cross hatched aqua on the Plan;
4. The garden of Gordon Square, London, which forms part of title number LN91321 and is shown cross hatched blue on the Plan;
5. The gardens known as Malet Street Gardens, London, which form part of title number LN94166 and are shown cross hatched green on the Plan;
6. The land at Woburn Square, London, which forms part of title number NGL376460 and is shown cross hatched purple on the Plan; and
7. Part of the land known as and situated at 52 to 60 Gower Street, London, being Bonham Carter and Warwickshire House, which is registered under title number LN179751 and shown cross hatched red on the Plan.