IN THE HIGH COURT OF JUSTICE	Claim No. []
BUSINESS AND PROPERTY COURTS		
OF ENGLAND AND WALES (ChD)		
PROPERTY, TRUSTS AND PROBATE LIST		
BETWEEN:-		
THE UNIVERSITY OF LONDO	ON	
-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)

	_
EXHIBIT AJ1	

Claimant

Defendants



KEY:

Blue circle – First Defendant, Abel Harvie-Clark

Red circle - Second Defendant, Tara Mann

Green circle - Third Defendant, Haya Adam

IN THE HIGH COURT OF JUSTICE	Claim No. [1	
BUSINESS AND PROPERTY COURTS			
OF ENGLAND AND WALES (ChD)			
PROPERTY, TRUSTS AND PROBATE LIST			
BETWEEN:-			
THE UNIVERSITY OF LO	ONDON	Claima	4
		<u>Claima</u>	<u>πι</u>
-and-			
(1) ABEL HARVIE-0	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)

EXHIBIT AJ2

Defendants



IN THE HIGH COURT OF JUSTICE	Claim No. [1
BUSINESS AND PROPERTY COURTS		
OF ENGLAND AND WALES (ChD)		
PROPERTY, TRUSTS AND PROBATE LIST		
BETWEEN:-		
THE UNIVERSITY OF LONDO	N	
-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)

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Claimant

EXHIBIT AJ3	

The electronic official copy of the register follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.

Applications are pending in ${\tt HM}$ Land Registry, which have not been completed against this title.



Official copy of register of title

Title number 325806

Edition date 23.03.2023

- This official copy shows the entries on the register of title on 17 AUG 2023 at 15:36:28.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 04 Oct 2024.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Croydon Office.

A: Property Register

This register describes the land and estate comprised in the title.

CAMDEN

- 1 (23.07.1926) The Freehold land shown edged with red on the plan of the above Title filed at the Registry and being Being The Warburg Institute, Woburn Square, The Courtauld Institute of Art, Woburn Square, 24 to 28 Woburn Square Part of the School of Oriental and African Studies, 10 Thornhaugh Street, 25 to 29 Russell Square, Stewart House, 32 Russell Square, Senate House, Malet Street, Institute of Education, Malet Street, Birkbeck College, Malet Street, University of London Union, Malet Street, 27 to 32 Torrington Square, land forming part of the roadway at Montague Place, Thornhaugh Street, Byng Place and Woburn Square, and land forming the roadway at Torrington Square and Thornhaugh Square.
- The land edged and numbered in green on the title plan has been removed from this title and registered under the title number or numbers shown in green on the said plan. The property description has been altered to reflect the land remaining in the title.
- 3 The land lettered B on the title plan has been added to the title.
- 4 The land edged and lettered C in red on the title plan added to the title on 26 January 1981.
- 5 The title plan has been amended to show by blue hatching the extent of the vaults and cellars included in the title.
- In addition to the land edged and numbered NGL729598 in green on the title plan the basement vaults beneath the land edged and numbered 1 and 2 in yellow have been removed under title NGL729598.
- The land remaining in the title has the benefit of the rights reserved by but is subject to the rights granted by a Transfer of the land edged and numbered NGL729598 in green on the title plan dated 16 June 1995 made between (1) University of London and (2) Law 646 Limited.
 - NOTE: Copy filed under NGL729598.
- 8 The land edged and lettered D and E in red on the title plan added to the title on 31 July 1995.
- 9 (17.12.2002) The land tinted pink on the title plan is no longer of any significance and should be ignored since the entry in the register which gave rise to this reference has been cancelled.

7 1 of 6

A: Property Register continued

(26.10.2011) The land has the benefit of the rights reserved by a Lease of 26 Bedford Way dated 18 October 2011 made between (1) University of London and (2) University College London for a term of 99 years from 18 October 2011.

NOTE: Copy filed under NGL921797.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

1 (27.07.1927) PROPRIETOR: THE UNIVERSITY OF LONDON of Senate House, Malet Street, London WC1E 7HU.

C: Charges Register

This register contains any charges and other matters that affect the land.

The land is subject to the provisions, reservations and Purchaser's covenants contained in an Instrument of Transfer dated 24 June 1927 of the land in this title made between (1) The Most Noble Herbrand 11th Duke of Bedford (Vendor) and (2) The University of London (Purchaser).

NOTE: Copy filed.

A Conveyance of the land in this title and of the land lettered B on the title plan dated 24 June 1927 and made between (1) The Most Noble Herbrand Eleventh Duke of Bedford (Vendor) and (2) The Honourable Victor Alexander Villiers Russell and Frederick William Fane and (3) The University of London (Purchasers) contains covenants.

NOTE: Copy filed.

3 A Licence dated 5 June 1939 and made between (1) The University of London and (2) The School of Oriental and African Studies and (3) Birkbeck College for the construction and use of a heating and power chamber on the land coloured blue on the title plan as therein appears.

NOTE: Copy filed.

- The parts of the land affected thereby are subject to the leases set out in the schedule of leases hereto.

 The leases grant and reserve easements as therein mentioned.
- The Conveyance dated 24 June 1927 referred to above contains covenants affecting the land edged and lettered D and E on the title plan.
- 6 (25.01.2000) A Deed dated 12 January 2000 made between (1) University of London and (2) Bloomsbury Heat & Power Limited relates to rights of access and egress, user of plant, parking space and other rights as therein mentioned.

NOTE: No copy of the Deed referred to is held by Land Registry.

- 7 (24.05.2006) The parts of the land affected thereby are subject to the rights granted by a Lease of a Transformer Chamber dated 2 July 1958 referred to in the schedule of leases hereto.
- 8 (11.01.2007) UNILATERAL NOTICE affecting University of London Union, Malet Street, London in respect of Lease dated 21 December 2006 made between (1) University of London and (2) Cardpoint Remote Limited for a term of 7 Years from 21 December 2006.
- 9 (11.01.2007) BENEFICIARY: Cardpoint Remote Limited (Co. Regn. No. 05101148) of Transaction House, Skyways Commercial Campus, Amy Johnson Way, Blackpool, Lancs FY4 3RS.
- 10 (09.02.2011) UNILATERAL NOTICE affecting Room 355, Senate House, Malet

C: Charges Register continued

Street, London in respect of a lease dated 31 January 2011 made between (1) University of London and (2) Emma Stafford and Philip Hooker as trustees of The Classical Association for a term commencing on and including 1 August 2010 to 31 July 2015.

NOTE: Copy filed.

- 11 (09.02.2011) BENEFICIARY: Emma Stafford and Philip Hooker as trustees of The Classical Association of Room 355, Senate House, Malet Street, London WC1E 7HU.
- 12 (03.06.2011) UNILATERAL NOTICE affecting Room 244, Senate House in respect of a Lease dated 26 May 2011 made between (1) University of London and (2) The Society for the Promotions of Roman Studies.

NOTE: Copy filed.

- 13 (03.06.2011) BENEFICIARY: The Society for the Promotion of Roman Studies of Room 244, Senate House, Malet Street, London WC1E 7HU.
- 14 (10.10.2014) The land is subject to the easements granted by a lease dated 17 September 2014 of Rooms 261, 263 and 264 Senate House Malet Street London for a term commencing on 1 August 2014 and expiring on 31 July 2018.

NOTE: Copy filed.

15 (08.02.2018) The land is subject to the easements granted by a lease dated 15 January 2018 of Part of fourth floor, Senate House for a term commencing on 15 January 2018 and expiring on 31 July 2022.

NOTE: Copy filed.

16 (04.04.2018) An Agreement dated 20 March 2018 affecting 32 Torrington Square made between (1) The University Of London (2) Birkbeck College and (3) The Mayor and Burgesses of The London Borough of Camden pursuant to section 106 of the Town and Country Planning Act 1990 contains provisions and covenants relating to the development of the land in this title.

NOTE:-Copy filed.

17 (07.11.2018) The land is subject to the easements granted by a lease dated 8 October 2018 of Rooms 102, 103, 104, 105 and 106/7 first floor, Senate House for a term commencing on 6 September 2017 and expiring on 31 July 2022.

NOTE: Copy filed.

18 (10.01.2019) The land is subject to the easements granted by a lease of Level 2, Level 2 Mezzanine and Level 3, Student Central dated 28 November 2018 made between (1) University of London and (2) University College London for a term commencing on and including 13 November 2018 and expiring on 31 July 2019.

NOTE:-Copy filed.

- 19 (10.01.2019) Option to renew contained in the lease dated 28 November 2018 referred to above.
- 20 (16.09.2019) The land is subject to the easements granted by a Lease dated 10 September 2019 of part of Student Central being Rooms 211, 211D, 212, 213, 214, 215, 215a and 216 and corridors in between on the second floor, Rooms M202, M203, M204 and MC04A on the second floor mezzanine, Rooms 313, 314, 314A, 315, 316 and 317 and the corridors in between on the third floor and Rooms 301, 302, 303 and 304 on the third floor for a term commencing on and including 1 August 2019 and expiring on 31 July 2023.

NOTE: Copy filed.

Schedule of notices of leases

Scrie	dule of Hotices	o di leases		
	Registration date and plan ref.	Property description	Date of lease and term	Lessee's title
1	03.12.1952 45	Transformer Sub-Station being part of the basement of The University of London Union, Malet Street.	11.09.1952 60 years from 1.4.1953	LN101913
		grants rights of way and righ as therein mentioned	ts to lay and ma	intain
2	05.12.1952 46	Switchgear chamber being part of the basement of The North Heating Chamber Torrington Square	11.09.1952 60 years from 1.6.1952	LN101965
	NOTE 1: The lea	se grants rights as therein me	ntioned.	
	NOTE 2: The lan- affected by thi	d edged and lettered D in red s s lease	on the filed pla	an is
3	19.03.1991	The Courtald Institute Galleries, Woburn Square	15.02.1991 21 years (less 3 days) from 15.2.1991	NGL679883
4	19.03.1991	The Courtauld Institute Galleries, Woburn Square (Basement, Ground, First, Second, Third, Fourth and Fifth Floors)	15.02.1991 39 years from 14.2.2012	NGL679883
5	01.06.1993 edged and no'd in blue 1 (part of)		12.05.1993 98 years from 12.5.1993	NGL707277
	mentioned.	se contains an option to renew	upon the terms	tnerein
		ed dated 14 October 1993 made in the School of Oriental and Afr varied.		
	NOTE 3: Origina	l Deed filed NGL707277		
6	31.07.1995 edged and numbered 2 in blue.	The School of Oriental and African Studies	26.10.1955 999 years from 25.3.1939	NGL730037
	NOTE 1: By a De London and (2)	ed dated 1 June 1967 made betw The School of Oriental and Afr 26 October 1955 were varied.		
	London and (2) the above lease	ed dated 21 July 1995 made bet The School of Oriental and Afr were varied. iled under NGL730037	ween (1) The Uni ican Studies the	versity of terms of
7	31.07.1995 Edged and numbered 2 NOTE: The Lease	The School of Oriental and African Studies. comprises also other land	14.07.1977 999 years from 25.3.1939	NGL730037
8	21.02.1996 48	25-27 Torrington Square (Basement Vaults)	24.02.1996 98 years from 24.2.1996 (determinable as therein mentioned)	NGL735501
	NOTE 1: The lea mentioned.	se contains an option to renew	upon the terms	therein

NOTE 2: The lease is not a new tenancy for the purposes of Section 1 of the Landlord and Tenant (Covenants) Act 1995

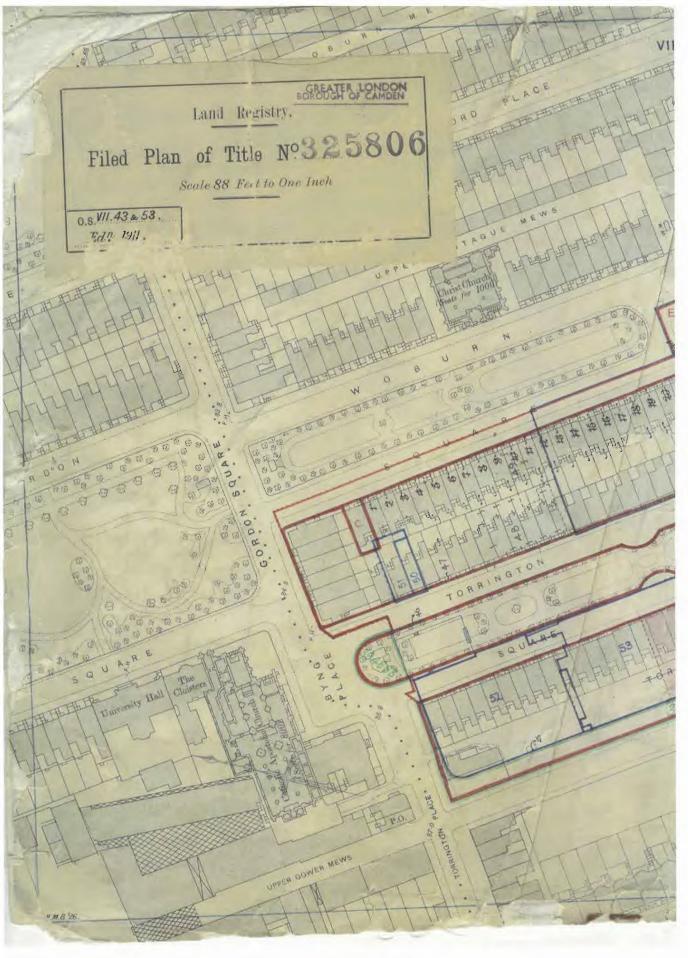
Schedule of notices of leases continued

Scrie	dule of Hotices	o or leases continued		
	Registration date and plan ref.	Property description	Date of lease and term	Lessee's title
9	18.07.1996 35	30 Russell Square	03.07.1996 1.9.1995	NGL739908
10		Part of Birbeck College, Malet Street (Basement and Ground Floor) dated 5 August 1977 referred pt for part of the ground floo		
11	04.02.2005 49 (part of)	Land adjoining Clore Management Centre	29.12.2004 98 years from 24.1.1996 (determinable as therein mentioned)	NGL844647
	NOTE: The lease mentioned	contains an option to renew u	pon the terms th	nerein
12	24.05.2006	Transformer Chamber, Woburn Square (Basement level)	02.07.1958 60 years from 06.02.1948	NGL863670
	NOTE: See entry by this lease	in the charges register relat		s granted
13	25.08.2009	Part of Basement Floor, ULCC Computer Room, Stewart House	20.07.2009 10 years from 1.8.2008 to 31.7.2018	NGL905962
14	11.01.2010	27 Russell Square (Basement and Vaults)	07.10.2009 99 years from 7.10.2009	NGL908224
15	11.01.2010	28 Russell Square (Basement and Vaults)	07.10.2009 99 years from 7.10.2009	NGL908225
16	11.01.2010	29 Russell Square (Basement and Vaults)	07.10.2009 99 years from 7.10.2009	NGL908226
17	07.08.2012	Birkbeck College, 25-26 Russell Square (Basement and Vaults)	19.07.2012 99 years from 19.9.2012	NGL928033
18	07.12.2012	Rooms 259 and 260, Senate House South Block, Malet Street	29.11.2012 From and including 29.11.2012 expiring 31.7.2017	
19	19.04.2013	North Block, Senate House, Malet Street (Basement, Ground, First, Second and Third Floor)	21.03.2013 99 years from 21.3.2013	NGL933666
20	14.10.2013	Room 258a, Senate House South Block (Second Floor), Malet Street	27.09.2013 From and including 27.9.2013 to 31.7.2017	
21	09.10.2015	Student Central, Malet Street, London (Part of Fourth floor)	17.09.2015 From and including 1 August 2015 and expiring on 31 July 2025	NGL954617

Schedule of notices of leases continued

	Registration date and plan ref.	Property description	Date of lease and term	Lessee's title
22	16.02.2016 edged and numbered 3 in blue	Senate House (Third Floor)	19.12.2014 From 19.12.2014 to 31.07.2024	NGL957722
23	13.04.2018 Edged and numbered 50 in blue (part of)	32 Torrington Square (the airspace is excluded)	20.03.2018 99 years commencing on 20.3.2018	NGL978553
24	13.04.2018 Edged and numbered 51 in blue (part of)	33 Torrington Square (the airspace is excluded)	20.03.2018 99 years from 20.3.2018	NGL978555
25	07.10.2019 Edged and numbered 53 in blue	Birkbeck College, Main Building (Basement and Ground to Seventh Floors)	02.10.2019 999 years from 2 October 2019	BB1537
26	13.08.2021 Edged and numbered 52 in blue NOTE: This leas lease identifie	Student Central, Malet Street e takes effect as a concurrent	23.07.2021 99 years from and including 23 July 2021 lease in relati	BB13733
27	03.11.2022	Senate House, Malet Street (part of fourth floor)	24.10.2022 From and including 1 August 2022 and expiring 31 July 2027	

End of register



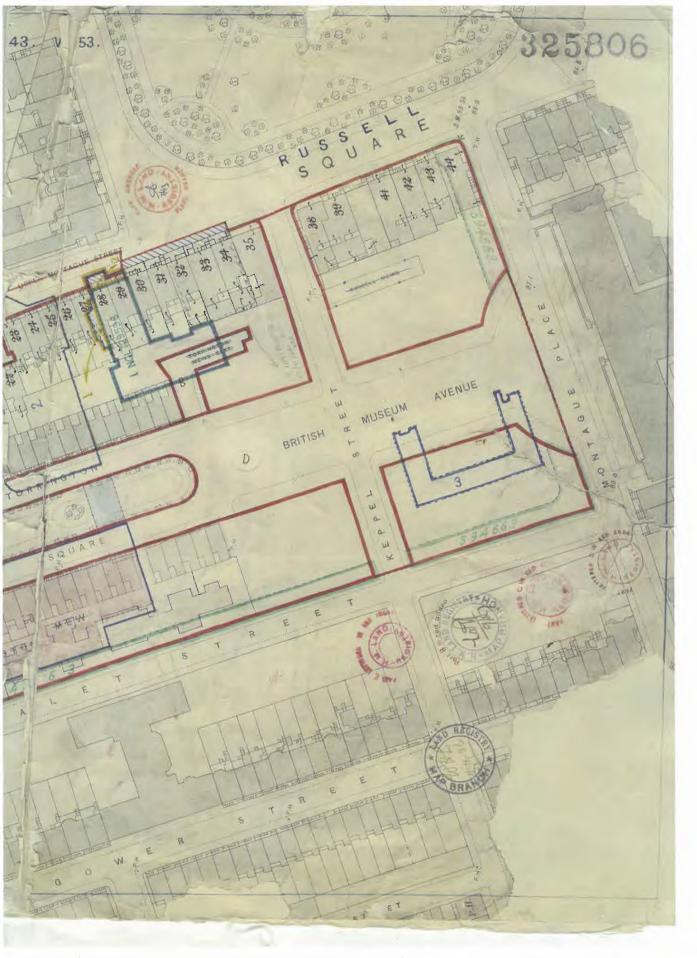
This official copy is issued, and shows the state of this title plan, on 17 August 2023 at 15:36:28.

It is admissible in evidence to the same extent as the original (s.67 Land Registration Act 2002).

This title is dealt with by HM Land Registry, Croydon Office.

This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground.

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This official copy is issued, and shows the state of this title plan, on 17 August 2023 at 15:36:28.
It is admissible in evidence to the same extent as the original (s.67 Land Registration Act 2002).
This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground.
This title is dealt with by HM Land Registry, Croydon Office.

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IN THE HIGH COURT OF JUSTICE	Claim No. []
BUSINESS AND PROPERTY COURTS		
OF ENGLAND AND WALES (ChD)		
PROPERTY, TRUSTS AND PROBATE LIST		
BETWEEN:-		
THE UNIVERSITY OF LONDON	I	
a.u.d		
-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)

Defendan	ts

Claimant

EXHIBIT AJ4	

The electronic official copy of the register follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.



Official copy of register of title

Title number LN91321

Edition date 15.05.2013

- This official copy shows the entries on the register of title on 04 OCT 2024 at 10:14:05.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 04 Oct 2024.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Croydon Office.

A: Property Register

This register describes the land and estate comprised in the title.

CAMDEN

The Freehold land shown edged with red on the plan of the above Title filed at the Registry and being part of 29 to 35 (all) Gordon Square, 14 Taviton Street, and the garden of Gordon Square

The title plan has been amended to show by blue tinting the cellars and vaults lying beneath the roadway.

The land has the benefit of the following rights excepted and reserved by the transfer of the land tinted yellow on the title plan referred to in the Charges Register.

"The following are excepted and reserved out of the property to the University in fee simple for the benefit of its said adjoining property:-

(a) the right to use in the event of fire or other emergency the external fire escape staircase existing on the property at the commencement of this Act and the then existing means of access to and from such fire escape staircase:-

Provided always that in the event of the College needing to demolish the said fire escape staircase the College may by not less than three months' previous notice in writing to the University determine the said right;

(b) the right to continue to discharge an extract fan as now existing on 29 Gordon Square over the said escape staircase referred to in subparagraph (a) above:-

Provided always that the College may by not less than three months' previous notice in writing to the University determine the said right;

- (c) the right of support from the land comprised in the property to the said adjoining property of the University (including the buildings comprised therein):
- (d) the right to use for all purposes connected with the said adjoining property of the University any sewers, drains, watercourses, pipes, cables, wires or other channels or conductors in, under or over the property, with power at any time or times to enter thereupon for the

A: Property Register continued

purpose of making connections with, repairing, renewing, maintaining, inspecting or cleansing the same;

- (e) the right to light and air to the basement windows of the Institutes of Archaeology and Classical Studies;
- (f) the right to enter upon the property for the purpose of carrying out maintenance and repairs or building works to the said adjoining property which cannot conveniently be carried out from such adjoining property the University making good all damage to the property thereby occasioned."
- 3 (15.05.2013) The land has the benefit of the rights granted by a Deed of Release dated 3 May 2013 made between (1) University College London (2) University Of London and (3) Bank Of Scotland Plc.

NOTE:-Copy filed .

By the Deed dated 3 May 2013 referred to above the rights contained in clauses "(a)" and "(b)" of the transfer of the land tinted yellow on the title plan under the University College London Act 1979 referred to above have been extinguished.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

1 (13.09.1931) PROPRIETOR: THE UNIVERSITY OF LONDON of Senate House, London, Malet Street, London WC1E 7HU.

C: Charges Register

This register contains any charges and other matters that affect the land.

A Conveyance dated 8 May 1951 made between (1) The Most Noble Hastings Williams Sackville (Vendor) (2) The Honourable Victor Alexander Frederick Villiers Russell Angus Chambers Lyell and Owen Johnston Humbert (3) Glyn Mills & Co and (4) The University of London (Purchaser) contains the following covenants:-

"THE Purchaser and its successors in title and assigns hereby COVENANT with the Vendor as follows:-

- (1) That the Purchaser will submit to the Vendor or his Steward at the Bedford Office at least six months before building operations are commenced detailed drawings showing the height and elevation of any proposed buildings fronting on Taviton Street Gordon Street or Gordon Square and further COVENANTS not to commence such buildings until such height and elevation have been approved by the Vendor."
- The land is subject to the following rights included in a transfer of the land tinted yellow on the title plan under the University College London Act 1979.

"The following are included in the transfer of the property to the College effected by Section 3 (Transfer of property of College) of this Act:-

- (a) the right of support from the adjoining property of the University known as 14 Taviton Street (formerly part of 34 and 35 Gordon Square), 29 Gordon Square and 30 and 34 inclusive Gordon Square (excluding the buildings comprised therein) for the land and buildings comprised in the property;
- (b) the right to use for all proper purposes connected with the property any sewers, drains, watercourses, pipes, cables, wires or

Title number LN91321

C: Charges Register continued

other channels or conductors in, under or over the said adjoining property of the University with power at any time or times to enter thereupon for the purpose of making connections with repairing, renewing, maintaining, inspecting or cleansing the same."

- 3 (02.02.1998) The parts of the land affected thereby are subject to the leases set out in the schedule of leases hereto.

 The leases grant and reserve easements as therein mentioned.
- 4 (15.06.2006) The parts of the land affected thereby are subject to the rights granted by the Lease of the Transformer Chamber dated 3 September 1976 referred to in the schedule of leases hereto.

Schedule of notices of leases

	Registration date and plan ref.	Property description	Date of lease and term	
1	24.09.2003	32 to 34 Gordon Square and 14 Taviton Street.	05.08.2003 99 years from 5.8.2003	NGL825860
	NOTE: The lease	comprises also other land	3.0.2000	
2	15.06.2006	Transformer Chamber, Taviton Street	03.09.1976 60 years from29.9.1968	NGL864682
		the subsistence of this lease, o above takes effect as an unde		5 August
	NOTE 2: See the granted by this	entry in the charges register Lease	relating to the	rights
3	15.05.2013 edged and No 1 in blue	29 Gordon Square	03.05.2013 99 years from 24.11.1986	NGL934332

End of register

These are the notes referred to on the following official copy

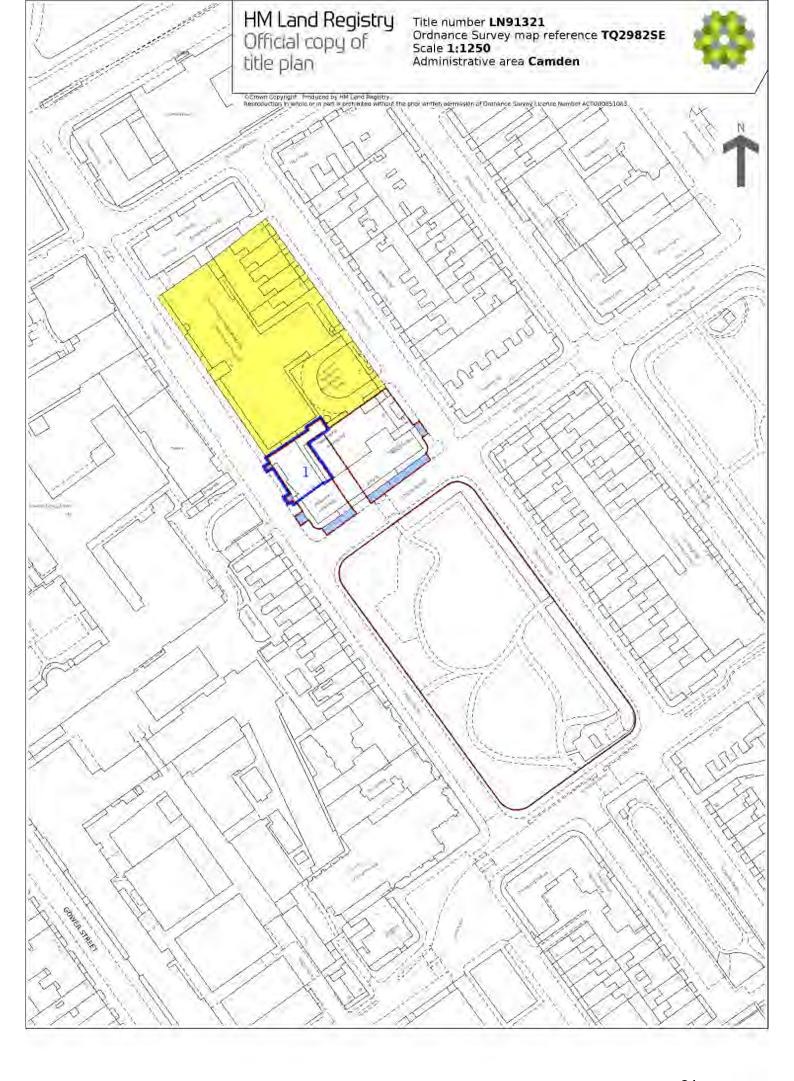
The electronic official copy of the title plan follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.

This official copy was delivered electronically and when printed will not be to scale. You can obtain a paper official copy by ordering one from HM Land Registry.

This official copy is issued on 04 October 2024 shows the state of this title plan on 04 October 2024 at 10:14:05. It is admissible in evidence to the same extent as the original (s.67 Land Registration Act 2002). This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground.

This title is dealt with by the HM Land Registry, Croydon Office .



IN THE HIGH COURT OF JUSTICE	Claim No. []
BUSINESS AND PROPERTY COURTS		
OF ENGLAND AND WALES (ChD)		
PROPERTY, TRUSTS AND PROBATE LIST		
BETWEEN:-		
THE UNIVERSITY OF LONDO	N	
		<u>Claimant</u>
-and-		
(1) ABEL HARVIE-CLAR (2) TARA MANN (3) HAYA ADAM (4) PERSONS UNKNOWN WHO, IN CONNECTION WITH SANCTIONS PROTESTS BY THE 'SOAS LIBERAT 'DEMOCRATISE EDUCATION' MOVEMENTS, ENTI CONSENT OF THE CLAIMANT UPON ANY PART SCHEDULE 1) (5) PERSONS UNKNOWN WHO, IN CONNECTION WITH SANCTIONS PROTESTS BY THE 'SOAS LIBERAT 'DEMOCRATISE EDUCATION' MOVEMENTS, O INTERFERE WITH ACCESS TO AND FROM ANY PA SCHEDULE 1) (6) PERSONS UNKNOWN WHO, IN CONNECTION WITH SANCTIONS PROTESTS BY THE 'SOAS LIBERAT 'DEMOCRATISE EDUCATION' MOVEMENTS, ER STRUCTURE, WHETHER PERMANENT OR TEMPO LAND (DEFINED IN SCHED	I BOYCOTT, DIVES ED ZONE FOR GAS ER OR REMAIN WI OF THE LAND (DI BOYCOTT, DIVES ED ZONE FOR GAS BSTRUCT OR OTH ART OF THE LAND I BOYCOTT, DIVES ED ZONE FOR GAS RECT ANY TENT OF	ZA' AND/OR THOUT THE EFINED IN STMENT, AND ZA' AND/OR HERWISE (DEFINED IN STMENT, AND ZA' AND/OR R OTHER ART OF THE
		<u>Defendants</u>

The electronic official copy of the register follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.



Official copy of register of title

Title number LN94166

Edition date 24.08.2022

- This official copy shows the entries on the register of title on 04 OCT 2024 at 10:15:16.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 04 Oct 2024.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Croydon Office.

A: Property Register

This register describes the land and estate comprised in the title.

CAMDEN

- 1 (01.01.1952) The Freehold land shown edged with red on the plan of the above Title filed at the Registry and being 11 Bedford Square, London, WC1B 3RF, 2, 4, 8, 10, 12, 14, 16, 18 and 20 Gower Street, London, WC1E 6DP, 82 Gower Street, London, WC1E 7JD and 42, 44, 46, 48, 50, 52, 64, 56 Torrington Place, London WC1E 7JD.
- 2 (29.05.2014) A new title plan based on the latest revision of the Ordnance Survey Map has been prepared.
- 3 (29.05.2014) The title plan has been amended to show by blue tinting the vaults beneath Torrington Place, Gower Street, Malet Street and Montague Place which are included in the title.
- 4 (10.10.2014) The land edged and numbered in green on the title plan has been removed from this title and registered under the title number or numbers shown in green on the said plan. The property description has been altered to reflect the land remaining in the title.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

1 (01.01.1952) PROPRIETOR: THE UNIVERSITY OF LONDON of Senate House, London WC1.

C: Charges Register

This register contains any charges and other matters that affect the land.

A Conveyance dated 8 October 1951 made between (1) The Most Noble Hastings William Sackville Twelfth Duke of Bedford (Vendor) (2) The Honourable Victor Alexander Frederick Villiers Russell and others (3) Messrs Glyn Mills & Co. and (4) The University of London (Purchaser) contains the following covenants:-

24 1 of 2

Title number LN94166

C: Charges Register continued

"The purchaser and its successors in title and assigns ${\tt HEREBY\ COVENANTS}$ with the vendor as follows:-

That the purchaser will submit to the vendor or his steward at the Bedford Office at least six months before building operations are commenced detailed drawings showing the height and elevation of any proposed buildings fronting Bedford Square and/or Gower Street and further covenants not to commence such buildings until such height and elevation have been approved by the vendor."

- The parts of the land affected thereby are subject to the leases set out in the schedule of leases hereto.

 The leases grant and reserve easements as therein mentioned.
- 3 (26.04.2021) The land is subject to the easements granted by a lease of the basement, ground, first and part third floors, 18-20 Gower Street dated 23 April 2021 made between (1) University Of London and (2) Raj Murthi and Mark Robert Alfred Hunter for a term commencing on and including 1 August 2020 and expiring on 31 July 2025.

NOTE:-Copy filed.

Schedule of notices of leases

	Registration date and plan ref.	Property description	Date of lease and term	Lessee's title
1	10.10.2014 numbered 2 in yellow	11 Bedford Square	17.09.2014 99 years from 17/09/2014	NGL946146
2	24.08.2022 edged and numbered 1 in yellow	42 to 56 (even) Torrington Place	12.08.2022 5 years from and including 6 February 2022	

End of register

These are the notes referred to on the following official copy

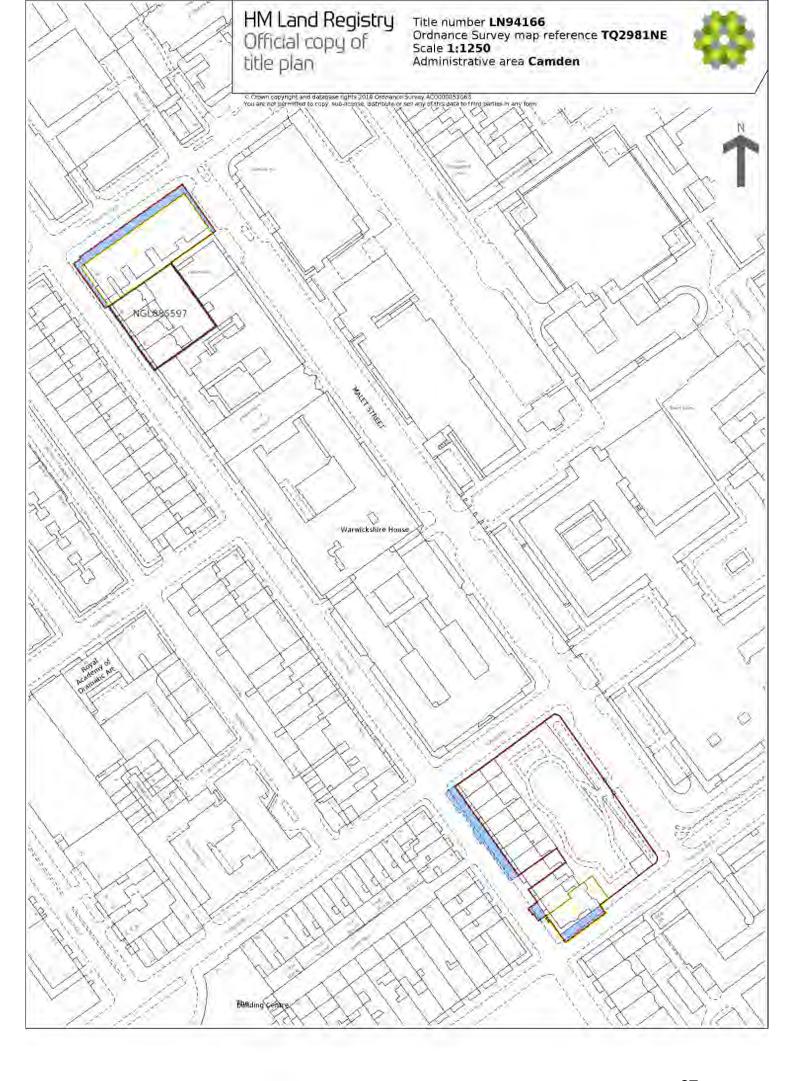
The electronic official copy of the title plan follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.

This official copy was delivered electronically and when printed will not be to scale. You can obtain a paper official copy by ordering one from HM Land Registry.

This official copy is issued on 04 October 2024 shows the state of this title plan on 04 October 2024 at 10:15:16. It is admissible in evidence to the same extent as the original (s.67 Land Registration Act 2002). This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground.

This title is dealt with by the HM Land Registry, Croydon Office .



IN THE HIGH COURT OF JUSTICE	Claim No. [1
BUSINESS AND PROPERTY COURTS		
OF ENGLAND AND WALES (ChD)		
PROPERTY, TRUSTS AND PROBATE LIST		
BETWEEN:-		
THE UNIVERSITY OF LON	IDON	<u>Claimant</u>
-and-		
(1) ABEL HARVIE-CL (2) TARA MANN (3) HAYA ADAM (4) PERSONS UNKNOWN WHO, IN CONNECTION W SANCTIONS PROTESTS BY THE 'SOAS LIBER 'DEMOCRATISE EDUCATION' MOVEMENTS, E CONSENT OF THE CLAIMANT UPON ANY PA	/ITH BOYCOTT, DIVE LATED ZONE FOR GA NTER OR REMAIN W LART OF THE LAND (I	AZA' AND/OR VITHOUT THE
(5) PERSONS UNKNOWN WHO, IN CONNECTION W SANCTIONS PROTESTS BY THE 'SOAS LIBER 'DEMOCRATISE EDUCATION' MOVEMENTS	ITH BOYCOTT, DIVE	AZA' AND/OR

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)

EXHIBIT AJ6

Defendants

The electronic official copy of the register follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.

Applications are pending in ${\tt HM}$ Land Registry, which have not been completed against this title.



Official copy of register of title

Title number NGL376460

Edition date 23.03.2023

- This official copy shows the entries on the register of title on 31 JUL 2023 at 06:03:54.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 04 Oct 2024.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Croydon Office.

A: Property Register

This register describes the land and estate comprised in the title.

CAMDEN

- The Freehold land shown edged with red on the plan of the above Title filed at the Registry and being 55 to 59 Gordon Square, 10 to 18 Woburn Square and Woburn Square Gardens, 35 to 42 Thornhaugh Mews, 9 Thornhaugh Street, 21 to 24 Russell Square and parts of the School of Oriental and African Studies, Thornhaugh Street, and the Institutes of Education and Law (University of London), 20 Bedford Way, London.
- 2 (22.01.1997) The land edged and lettered A in red on the title plan added to the title on 31 July 1995.
- 3 (25.03.2021) A new title plan based on the latest revision of the Ordnance Survey Map has been prepared.
- 4 (25.03.2021) The title plan has been amended to show by blue hatching the extent of the vaults and cellars included in the title.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

1 PROPRIETOR: THE UNIVERSITY OF LONDON of Senate House, Malet Street, London WC1E 7HU.

C: Charges Register

This register contains any charges and other matters that affect the land.

A Conveyance of the land shown tinted pink and tinted blue on the title plan dated 8 February 1951 made between (1) The Most Noble Hastings William Sackville Twelth Duke of Bedford (Vendor), (2) The Honourable Victor Alexander Frederick Villiers Russell, Angus Chambers Lyell and Owen Johnstone Humbert, (3) Messrs. Glyn Mills & Co and (4) The University of London (Purchaser) contains the following covenants:-

C: Charges Register continued

"The purchaser and its successors in title and assigns ${\tt HEREBY}$ COVENANTS with the vendor as follows:

- (1) That the purchaser will submit to the vendor or his Steward at the Bedford Office at least six months before building operations are commenced detailed drawings showing the height and elevation of any proposed buildings fronting the south side of Gordon Square the west side of Bedford Way the north side of Russell Square and the east side of Woburn Square and further COVENANTS not to commenced such buildings until such height and elevation have been approved by the vendor
- (2) If at any time hereafter the whole or any part of the Woburn Square Garden should be built upon then the purchaser shall provide an additional equivalent area of open space elsewhere within the property the purchaser has or at any time hereafter shall have acquired from the vendor in the Borough of Holborn or St Pancras and the purchaser will properly maintain the said garden in Woburn Square or such equivalent area as a garden suitable for a high-class residential area
- (3) Will not during the period of twenty one years from the date hereof without the consent of the vendor or his successors in title to the Bedford Estate in the Parishes of Holborn or St Pancras take any steps directed towards the closing of the public roadways running east and west and situate along the south sides of Tavistock Square and Gordon Square."
- A Conveyance of the land shown tinted brown on the title plan dated 18 March 1980 made between (1) The Right Reverend Father in God Gerald Alexander Lord Bishop of London (Vendor) and (2) The University of London (Purchaser) contains the following covenants:-
 - "The purchaser so as to bind as far as practicable itself and its successors in title hereby covenants with the vendor not to permit any building or buildings now or hereafter erected on the property hereby conveyed or any part thereof to be used other than for the purposes of the University of London or for residential occupation."
- 3 The land shown tinted blue on the title plan was on the 24 September 1970 dedicated to the public forever by the University of London to the intent that it should be added to and form part of the public highway.
- 4 (22.01.1997) The land shown edged and lettered A in red on the title plan is included in the Conveyances dated 8 February 1951 and 18 March 1980 referred to above.
- 5 (25.01.2000) A Deed dated 12 January 2000 made between (1) University of London and (2) Bloomsbury Heat & Power Limited relates to rights of access and egress, user of plant, parking space and other rights as therein mentioned.
 - NOTE: No copy of the Deed referred to is held by Land Registry.
- 6 (14.04.2005) UNILATERAL NOTICE affecting 15 Woburn Square in respect of an Agreement for lease dated 23 March 2005 made between (1) University of London and (2) Institute of Education University of London.
- 7 (14.04.2005) BENEFICIARY: Institute of Education University of London of 20 Bedford Way, London WC1H OAL.
- 8 The parts of the land affected thereby are subject to the leases set out in the schedule of leases hereto.

 The leases grant and reserve easements as therein mentioned.
- 9 (09.08.2010) By a Deed dated 30 July 2010 made between (1) University of London and (2) Institute of Education University of London the terms of the lease dated 6 March 2008 of 20 Bedford Way referred to in the schedule of leases hereto were varied.
 - NOTE: Copy Deed filed under NGL895600.
- (30.10.2019) The parts of the land affected thereby are subject to the rights granted by a lease of Birkbeck College, Main Building (Ground to Seventh Floor) dated 2 October 2019 made between (1) University of London and (2) Birkbeck College, University of London for 999 years from 2 October 2019.

Title number NGL376460

C: Charges Register continued

NOTE: Copy filed under BB1537.

11 (13.08.2021) The land in this title and other land is subject to any rights that are granted by a lease of Student Central, Malet Street dated 23 July 2021 made between (1) University Of London and (2) Birkbeck College, University Of London and affect the registered land.

NOTE: Copy filed under BB13733.

Schedule of notices of leases

001101		01 100000		
	Registration date and plan ref.	Property description	Date of lease and term	Lessee's title
1	31.07.1995	The School of Oriental and African Studies	14.07.1977 999 years from 25.3.1939	NGL730037
	NOTE: The lease	comprises also other land.		
2	30.12.2005	15 Woburn Square	15.12.2005 99 years from 15.12.2005	NGL857025
3	31.03.2008	20 Bedford Way	06.03.2008 999 years from 6.3.2008	NGL895600
	NOTE: See entry dated 30 July 2	in the Charges Register relat 010.		variation
4	29.09.2010	land at Thornhaugh Mews	30.07.2010 from 30.7.2010 to 5.3.3007	NGL912319
5	13.04.2011	11 Woburn Square and the under pavement vault belonging thereto	22.03.2011 99 years commencing on 22 March 2011	NGL917746
	NOTE: The airsp	ace above the building is excl		
6	05.10.2011	55-59 Gordon Square together with under pavement vaults	12.09.2011 99 years from 12.9.2011	NGL921378
7	26.10.2011	26 Bedford Way (levels 2 to 14 only)	18.10.2011 99 years from 18/10/2011	NGL921797
8	01.08.2017	Charles Clore House, 17 Russell Square (Part Basement 1, Ground and First Floors)	09.07.1997 99 years from 1.1.1976	NGL971712
9	15.11.2017	Charles Clore House, 17 Russell Square (Part Basement, Ground and First Floors)	26.08.1976 99 years from 01.01.1976	NGL974531
10	19.11.2020	10 Woburn Square and the under pavement vault belonging thereto	27.10.2020 99 years from 27 October 2020	BB8897

End of register

These are the notes referred to on the following official copy

The electronic official copy of the title plan follows this message.

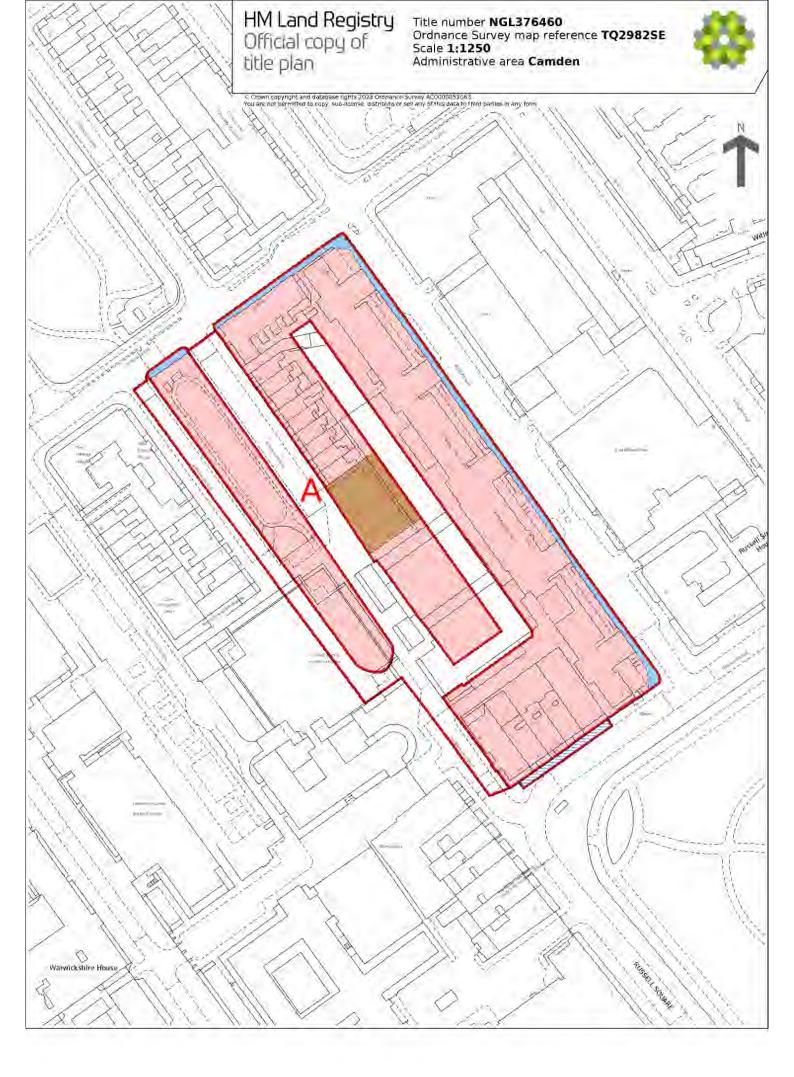
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This official copy was delivered electronically and when printed will not be to scale. You can obtain a paper official copy by ordering one from HM Land Registry.

There is an/are application(s) pending in HM Land Registry and if we have only completed the mapping work for a pending application affecting the title concerned, such as a transfer of part:

- additional colour or other references, for example 'numbered 1', may appear on the title plan (or be referred to in the certificate of inspection in form CI), but may not yet be mentioned in the register
- colour or other references may also have been amended or removed from the title plan (or not be referred to in form CI), but this may not be reflected in the register at this stage.

This official copy is issued on 04 October 2024 shows the state of this title plan on 31 July 2023 at 06:03:54. It is admissible in evidence to the same extent as the original (s.67 Land Registration Act 2002). This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground. This title is dealt with by the HM Land Registry, Croydon Office.



IN THE HIGH COURT OF JUSTICE	Claim No. [1
BUSINESS AND PROPERTY COURTS		
OF ENGLAND AND WALES (ChD)		
PROPERTY, TRUSTS AND PROBATE LIST		
BETWEEN:-		
THE UNIVERSITY OF LONDO	N	<u>Claimant</u>
-and-		
(1) ABEL HARVIE-CLARM (2) TARA MANN (3) HAYA ADAM (4) PERSONS UNKNOWN WHO, IN CONNECTION WITH SANCTIONS PROTESTS BY THE 'SOAS LIBERATE 'DEMOCRATISE EDUCATION' MOVEMENTS, ENTE CONSENT OF THE CLAIMANT UPON ANY PART SCHEDULE 1)	BOYCOTT, DIVE ED ZONE FOR GA ER OR REMAIN W	ZA' AND/OR ITHOUT THE

(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

Defendants

EXHIBIT AJ7	

The electronic official copy of the register follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.

Applications are pending in ${\tt HM}$ Land Registry, which have not been completed against this title.



Official copy of register of title

Title number LN179751

Edition date 18.08.2023

- This official copy shows the entries on the register of title on 29 NOV 2023 at 10:58:23.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 04 Oct 2024.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Croydon Office.

A: Property Register

This register describes the land and estate comprised in the title.

CAMDEN

1 (01.06.1959) The Freehold land shown edged with red on the plan of the above Title filed at the Registry and being Warwickshsire House, being 52 to 60 (even numbers) Gower Street, Royal Academy of Dramatic Art being 62 and 64 Gower Street, College Hall being 66 to 72 (even numbers) Gower Street and College Hall, Theatre and Dilke House, Malet Street.

NOTE: As to the parts tinted blue on the title plan, only the vaults are included in the title.

2 (26.10.2011) The land has the benefit of the rights reserved by a Lease of 26 Bedford Way dated 18 October 2011 made between (1) University of London and (2) University College London for a term of 99 years from 18 October 2011.

NOTE: Copy filed under NGL921797.

3 (20.07.2023) A new title plan based on the latest revision of the Ordnance Survey Map has been prepared.

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

1 (01.06.1959) PROPRIETOR: THE UNIVERSITY OF LONDON of Senate House, Malet Street, London WC1E 7HU.

C: Charges Register

This register contains any charges and other matters that affect the land.

The parts of the land affected thereby are subject to the leases set out in the schedule of leases hereto.

Title number LN179751

C: Charges Register continued

The leases grant and reserve easements as therein mentioned.

2 (22.10.2013) The land is subject to the rights granted by a Deed dated 23 May 2013 made between (1) University Of London and (2) University College London.

NOTE: Copy filed.

3 (30.10.2019) The parts of the land affected thereby are subject to the rights granted by a lease of Birkbeck College, Main Building (Ground to Seventh Floor) dated 2 October 2019 made between (1) University of London and (2) Birkbeck College, University of London for 999 years from 2 October 2019.

NOTE: Copy filed under BB1537.

4 (13.08.2021) The land in this title and other land is subject to any rights that are granted by a lease of Student Central, Malet Street dated 23 July 2021 made between (1) University Of London and (2) Birkbeck College, University Of London and affect the registered land.

NOTE: Copy filed under BB13733.

Schedule of notices of leases

	Registration date and plan ref.	Property description	Date of lease and term	Lessee's title
1	26.10.1965 Tinted pink	66 to 72 (even numberes) Gower Street	22.12.1947 80 years (less the last seven days) from 29.9.1947	LN61924
2	19.06.1997 Edged and numbered 2 and 3 in blue	62 to 64 Gower Street and The Vanbrugh Theatre	09.06.1997 999 years from 27.9.1996	NGL750658
3	15.06.2007	Basement Transformer Chamber, College Hall, Malet Street	08.06.2007 99 years from 8.6.2007	NGL883131

End of register

These are the notes referred to on the following official copy

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- additional colour or other references, for example 'numbered 1', may appear on the title plan (or be referred to in the certificate of inspection in form CI), but may not yet be mentioned in the register
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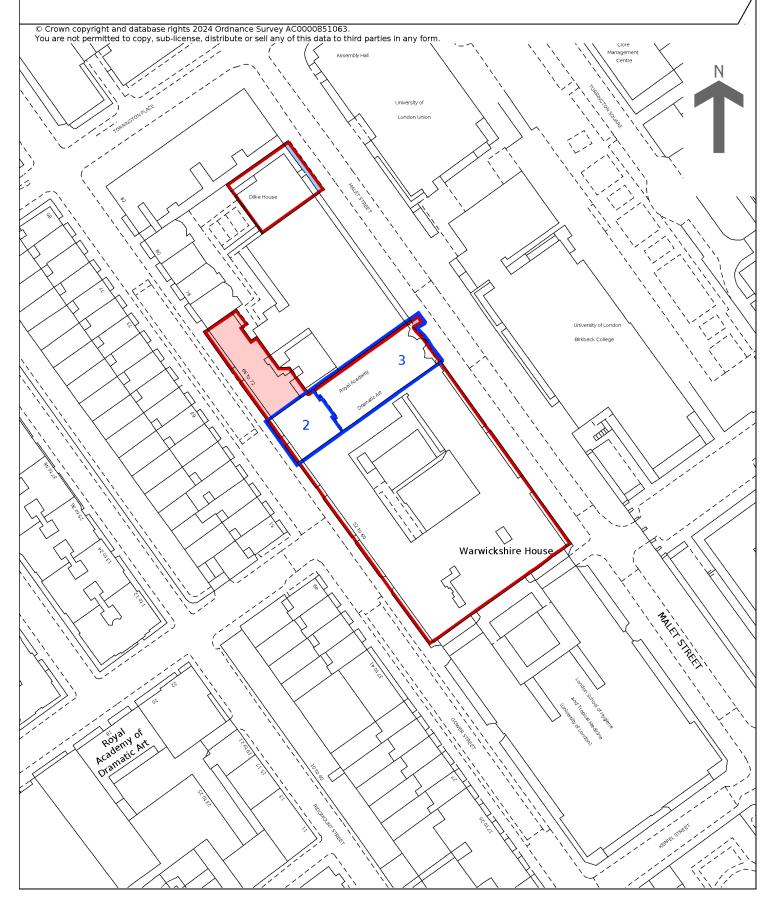
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This title is dealt with by the HM Land Registry, Croydon Office.

HM Land Registry Official copy of title plan

Title number **LN179751**Ordnance Survey map reference **TQ2981NE**Scale **1:1250**Administrative area **Camden**





IN THE HIGH COURT OF JUSTIC	E	Claim No. [1
BUSINESS AND PROPERTY CO	URTS		
OF ENGLAND AND WALES (Chi	O)		
PROPERTY, TRUSTS AND PRO	BATE LIST		
BETWEEN:-			
T	HE UNIVERSITY OF LONDON	I	Claimant
	- n d		<u>Claimant</u>
	-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)

D	et	е	nc	la	n	ts

EXHIBIT AJ8	

AERIAL VIEW OF DEFENDANTS' ENCAMPMENTS



IN THE HIGH COURT OF JUSTICE	Claim No. [1
BUSINESS AND PROPERTY COURTS		
OF ENGLAND AND WALES (ChD)		
PROPERTY, TRUSTS AND PROBATE LIST		
BETWEEN:-		
THE UNIVERSITY OF LOND	ON	
-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)

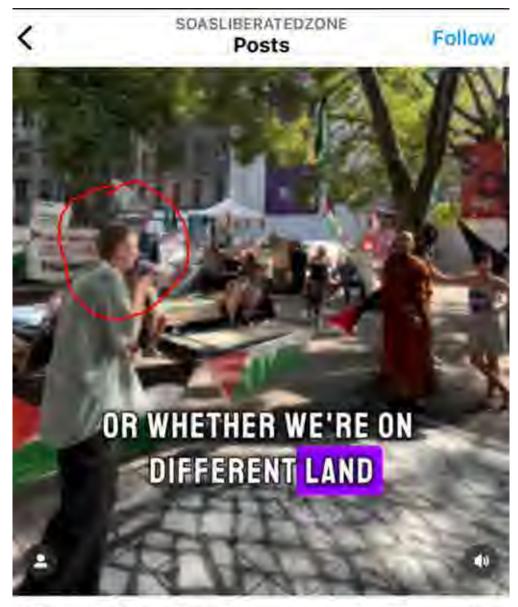
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Claimant

EXHIBIT AJ9	

IMAGES OF SECOND ENCAMPMENT





♥ 538 Q 12 ♥ 33

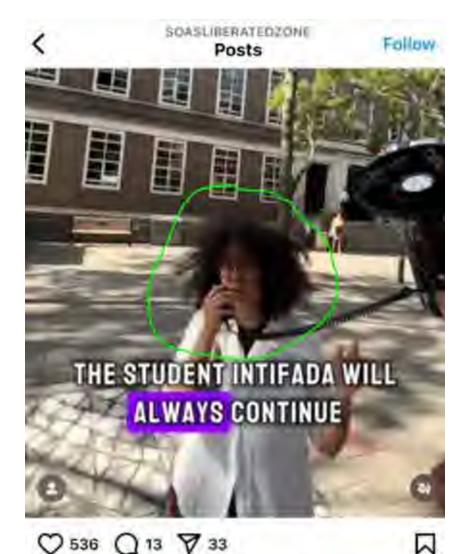
soasliberatedzone We don't fight on their terms, we don't fight through their systems or colonial courts. We decided to settle outside of court, when UoL provided less than 24 hrs notice for the hearing.

Join us this 'weekend for the future of the student Intifada', and let's make it our biggest one yet.

Our struggle continues, this is just the end of phase one... LONG LIVE THE STUDENT INTIFADA!

View all comments

1 August



soasliberatedzone We don't light on their terms, we don't light through their systems or colonial courts. We decided to settle outside of court, when UoL

provided less than 24 hrs notice for the hearing.

Join us this 'weekend for the future of the student Intifada', and let's make it our biggest one yet.

Our struggle continues, this is just the end of phase one... LONG LIVE THE STUDENT INTIFADA!

View all comments

1. Summer







soasliberatedzone The SOAS Liberated Zone phase two is happening !!

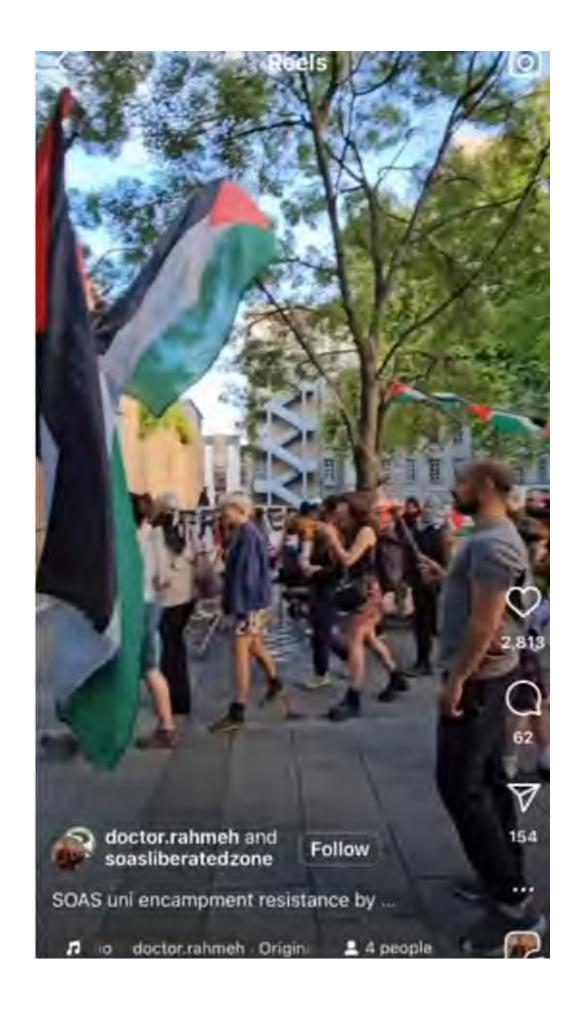
Following the 24 hrs notice for the eviction hearing, 7 SOAS students were suspended and threatened with expulsion without a notice of when the suspensions would end.

We have decided to relocate our encampment to a different area, as part of our choice to avoid paying fees to colonial institutions.

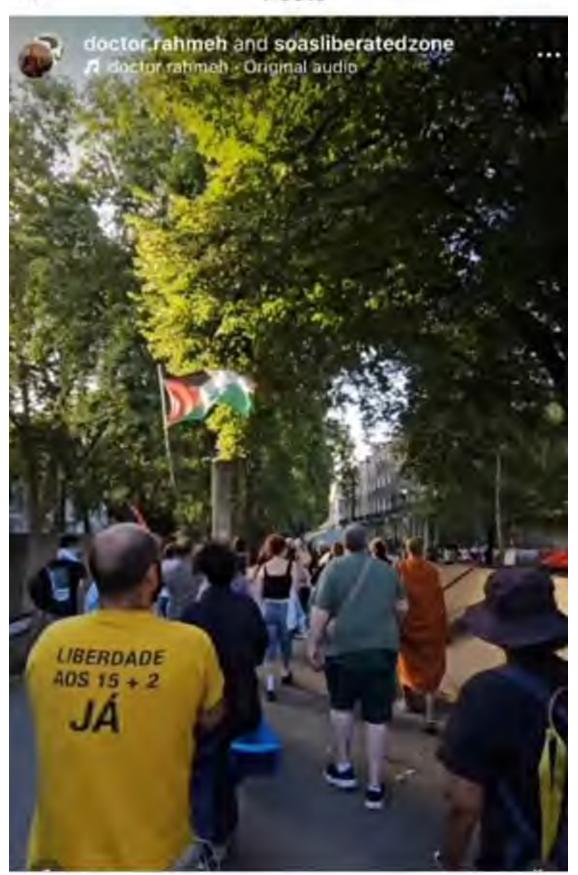
Our struggle continues, come and support by visiting the SOAS Liberated Zone for Gaza.

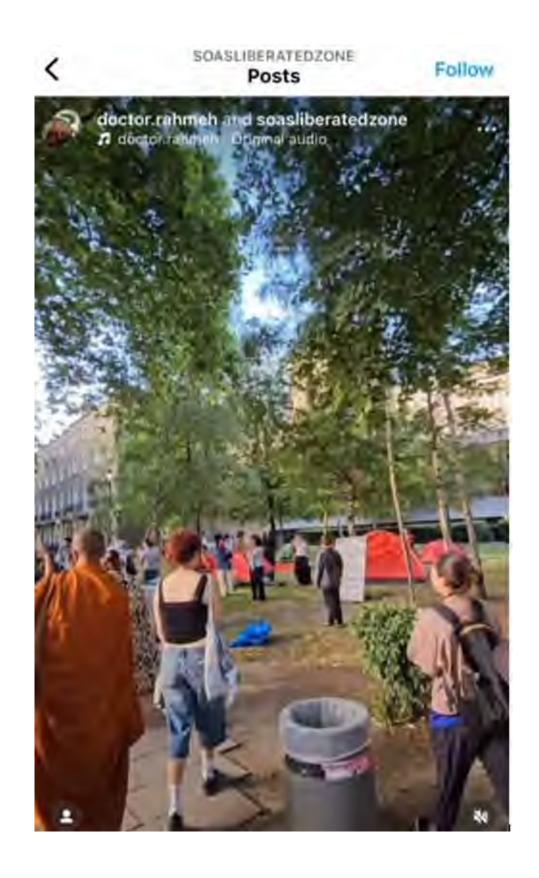
View all exerments

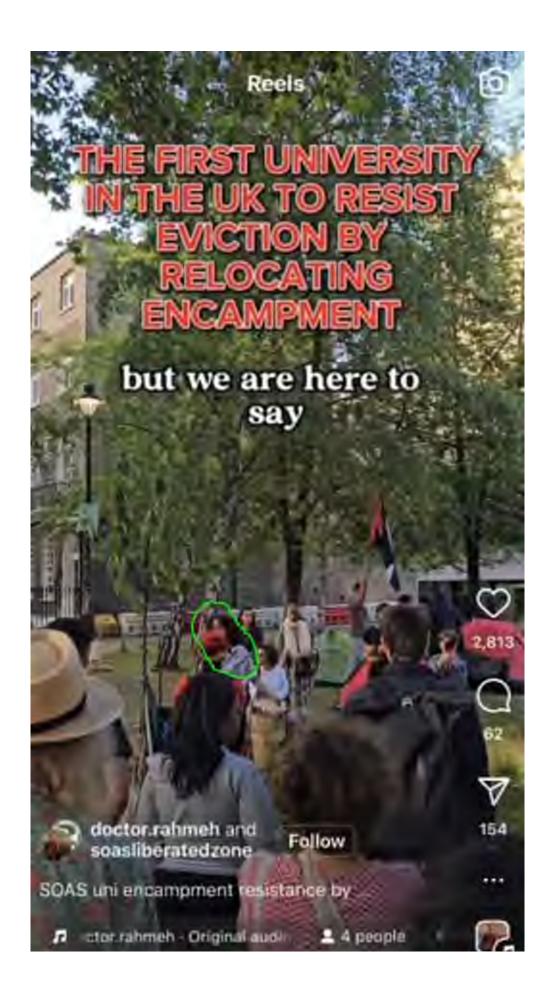
Si Assperit

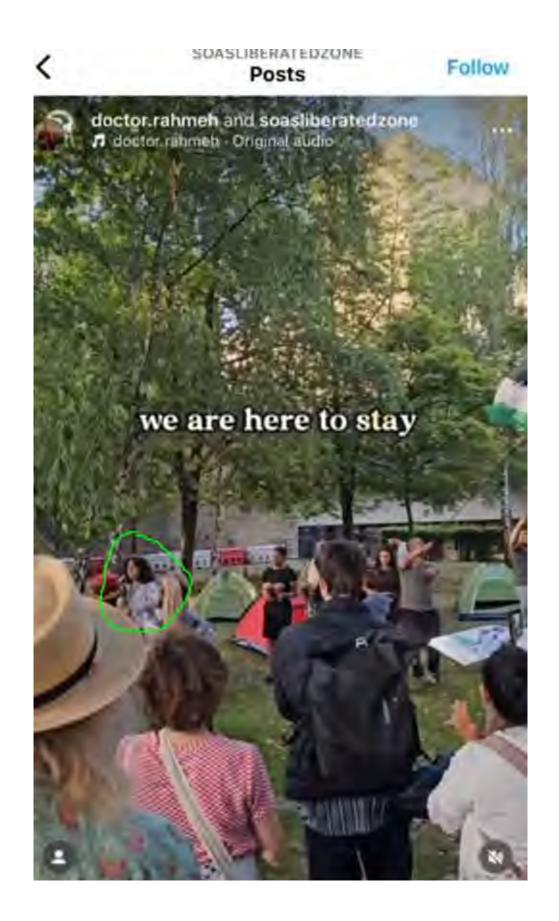


Posts Follow





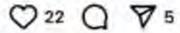






SOASLIBERATEDZONE Tagged







olgaelizabethmaher !! Post two of two... introducing the new SOAS Liberated Zone! E Congratulations to the student organisers who are remaining steadfast. I have nothing but love + respect for you.

If you want to visit the new encampment, please ask them how you can be of most use / how you can help them mobilise (or free-up their time to allow them to organise)

Abya Yala (+ Turtle Island) will always stand with Palestine ■■ X □

S August

SOASLIBERATEDZONE Follow



IN THE HIGH COURT OF JUSTICE	Claim No. []
BUSINESS AND PROPERTY COURTS		
OF ENGLAND AND WALES (ChD)		
PROPERTY, TRUSTS AND PROBATE LIST		
BETWEEN:-		
THE UNIVERSITY OF LONDON		
-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)
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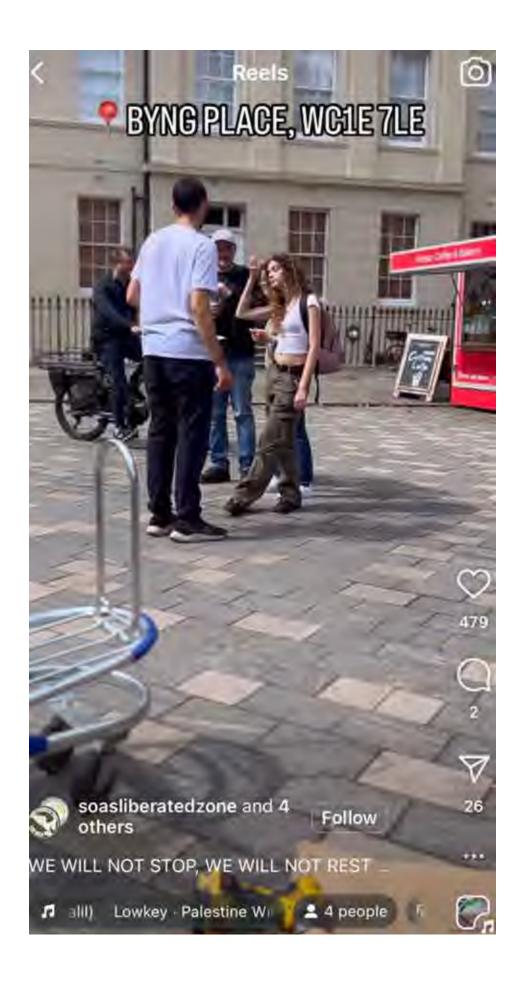
Defendants

Claimant

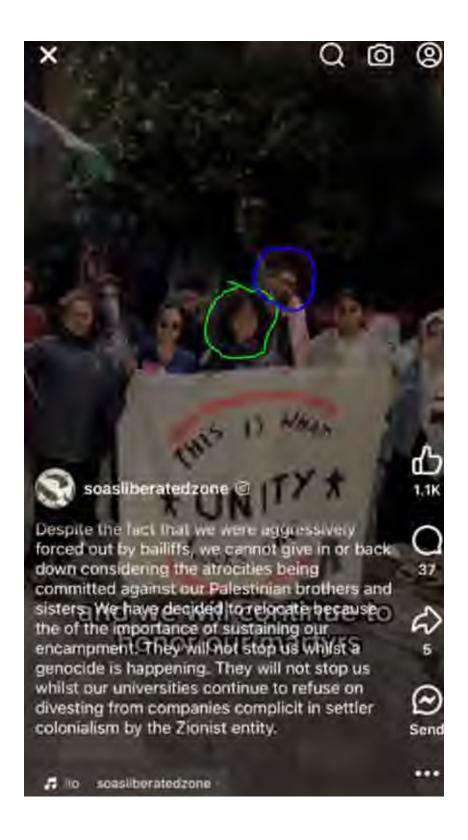
EXHIBIT AJ10	

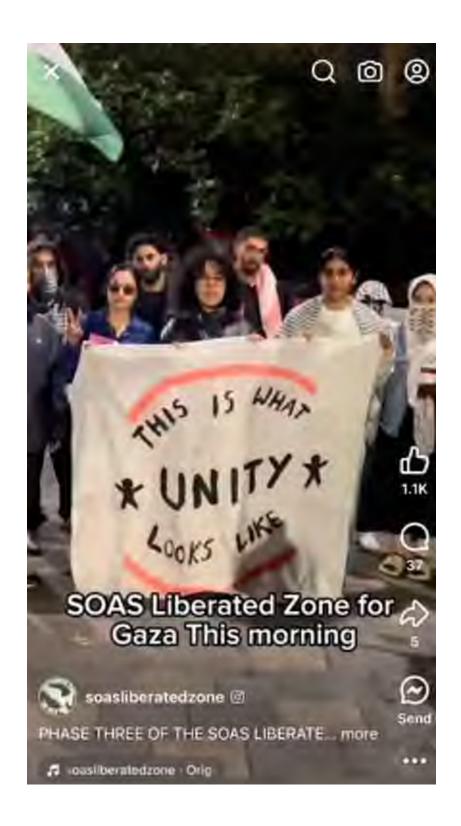
IMAGES OF THIRD ENCAMPMENT







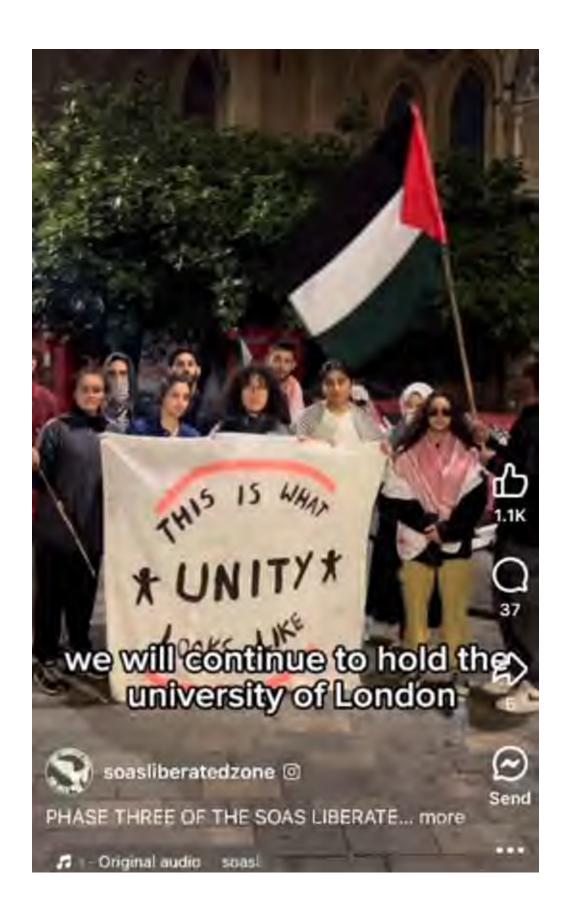


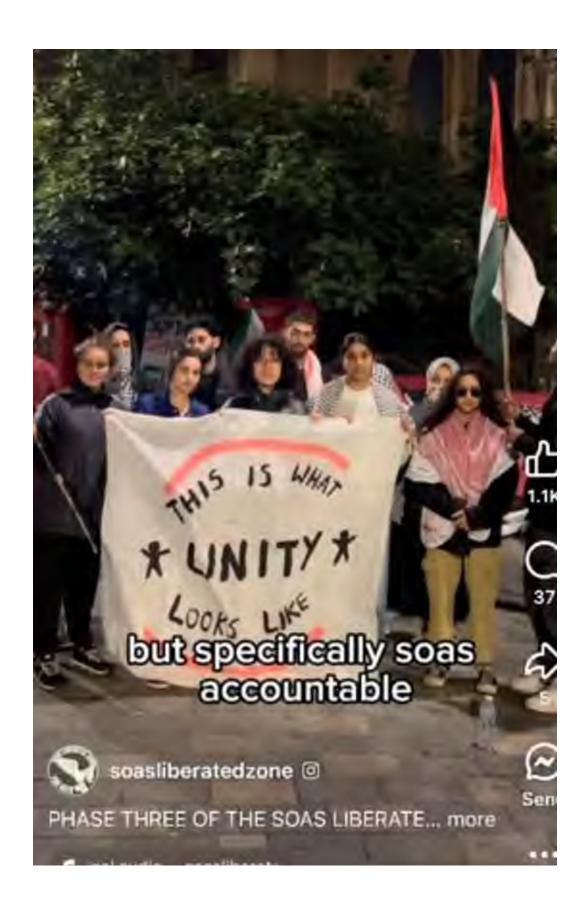




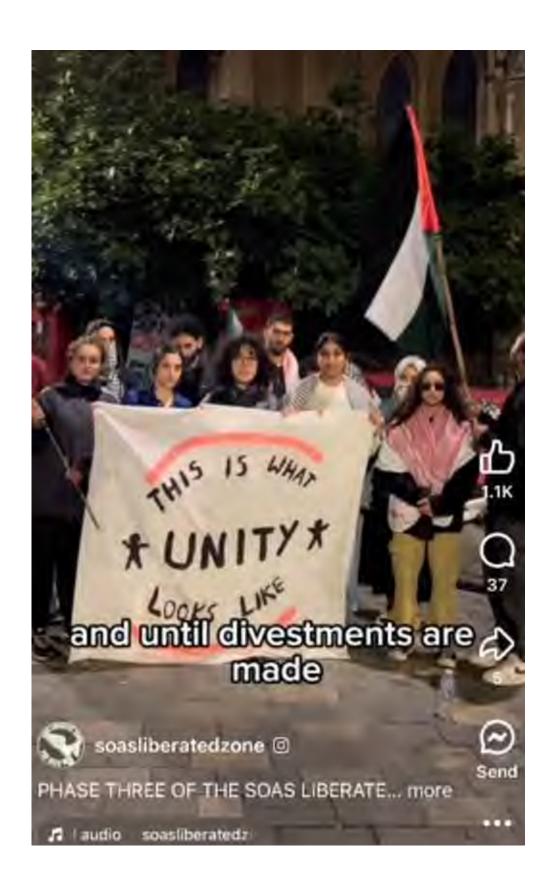


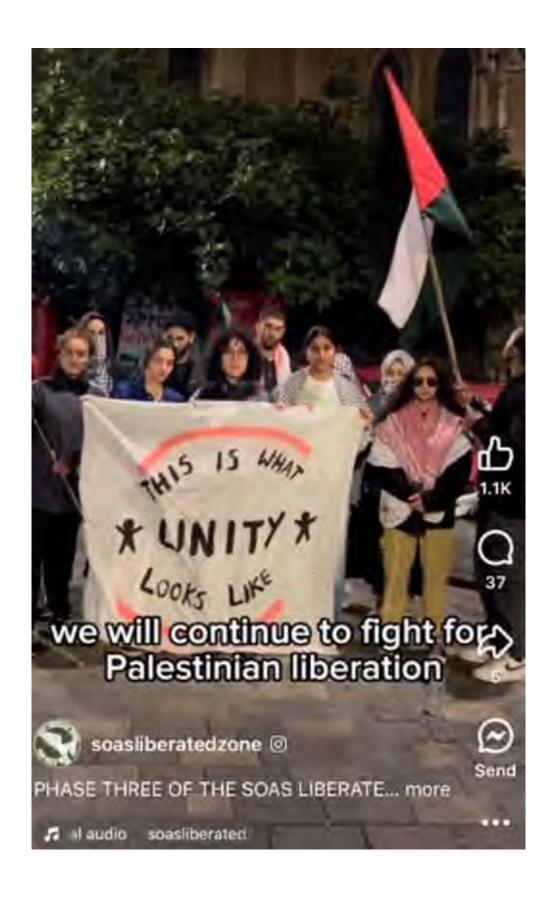












IN THE HIGH COURT OF JUSTICE	Claim No. []
BUSINESS AND PROPERTY COURTS		
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BETWEEN:-		
THE UNIVERSITY OF LONDON		
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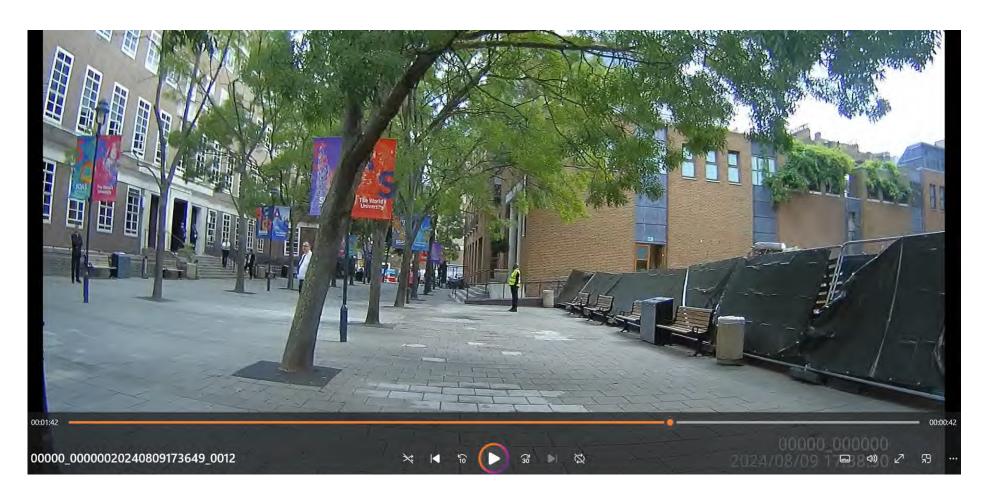
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Defendants

Claimant

EXHIBIT AJ11	

9 August 2024: Fencing erected by Claimant to prevent Defendants setting up another encampment on the 4th Quadrant



<u>11 August 2024:</u> Whilst not screenshots from a video taken by the Claimant's security personnel, they are screenshots from an SLZG post of members/supporters of the SLZG in which the First and Third Defendants can be seen at the Third Encampment with other Persons Unknown.









C 1,186 Q 14 ♥ 45 □

soasliberatedzone Today in the morning, Al Tab'in school was targeted in Gaza and so were over 100+ Palestinians who were killed by the zionist entity, lots of them whilst praying. Most of those martyred were children. Doctors have been saying that the body parts of our martyrs are so unrecognisable, they are now just weighing out approximately how much the martyr would be and burying a bag of body parts of the equivalent weight.

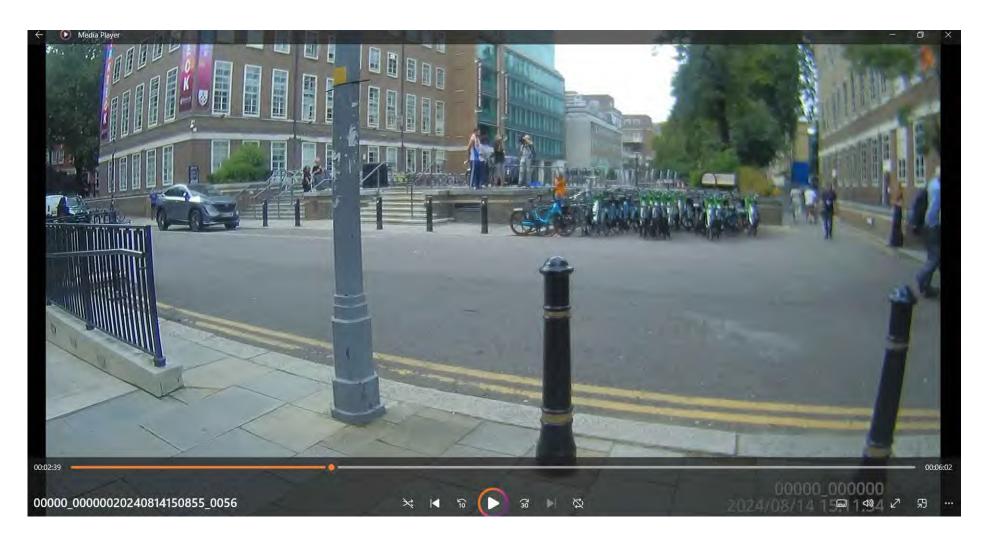
Yet after all these beyond barbaric atrocities are being committed, these institutions refuse to divest its ties with genocide. SOAS continues to fund the ongoing genocide in Gaza through companies like Albemarle, a US based weapons manufacturer, which invest in producing white phosphorus.

This is why we light. This is why we relocate and we continue with the SOAS liberated zone for Gaza. We refuse to remain silent and go about our daily lives knowing that our Palestinian brothers and sisters have the most horrific crimes against humanity being committed against them. SOAS' profits are drenched in Palestinian blood. We will continue to hold them accountable and escalate.

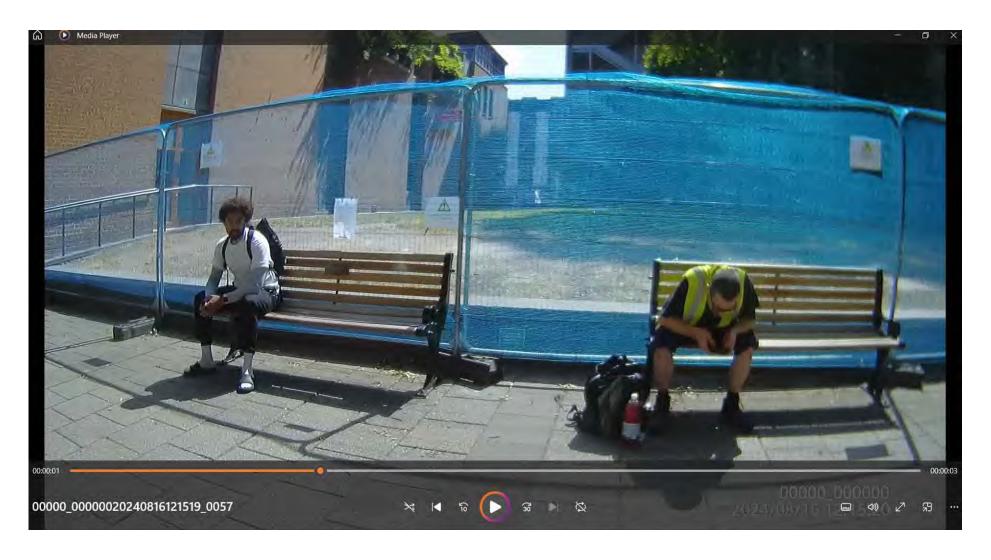
We will continue to honour our martyrs and their legacies. The resistance continues and we will continue to light for Palestinian liberation.

View all comments

14 August 2024: First Defendant, Second Defendant Third Defendant and Person Unknown (photographer) trespassing on Torrington Square



16 August 2024: Fencing erected by Claimant to prevent Defendants setting up another encampment on the 4th Quadrant



17 August 2024: Fencing erected by Claimant to prevent Defendants setting up another encampment on the 4th Quadrant







17 August 2024: Fencing erected by Claimant following dispersal of Defendants' second encampment set up on land at Woburn Square to prevent them setting up another encampment there







<u>17 August 2024:</u> Whilst not screenshots from a video taken by the Claimant's security personnel, they are screenshots from an SLZG post about a protest outside the offices of The Guardian newspaper staged by members or supporters of the SLZG which was attended by the First, Second and Third Defendants who can be seen in the images below which are included here as they follow the chronology of events.





Posts

FOHOW

snasliberated one Yesterday, we procused outside. The Guardian headquarters near Kings Cross, in order to ask them about their lack of transparency when covering the genecide in Gaza and their lack of reporting on student repression. We handed in a letter expressing our disturbance and concern with the way. The Guardian has been neglecting the cause for Palestinian liberation and an unbiasuit account of the ongoing genecide in Gaza that has now reached own 316 days.

The Guardian claims that it is a so called 'progressive media outlet, yot there is a clear double standard when it comes to writing about Palestine. If has a clear double standard or lack of reporting when writing about hypocritical British institutions that fund genocide and censor Palestine solidarity activism on campus such as SOAS.

Media and journalism is supposed to be a voice for the struggles of the people, rather the UK media is complicit in genocide pushing furth zionist propaganda, skerving the narrative and the truth about settlercolonialism and the ethnic cleanung of our Palestman brothers and sisters.

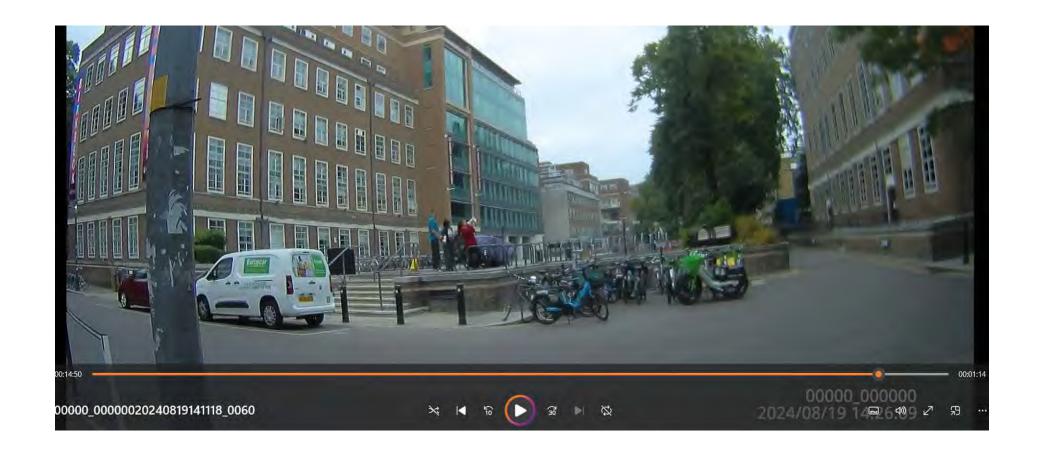
We will pove our own way in our media and we are here to stand against injustice within the media against undiets like The Guardian, continuing to demand that they report fairly on what's happening in Gaza, centring those on the ground. We will continue to break points mythe and highlight the truth about Palestine.

We continue to honour our martyrs. We continue to resterate that this is not a conflict, not a war, this is genocide. The UK media carries blood on its hands!

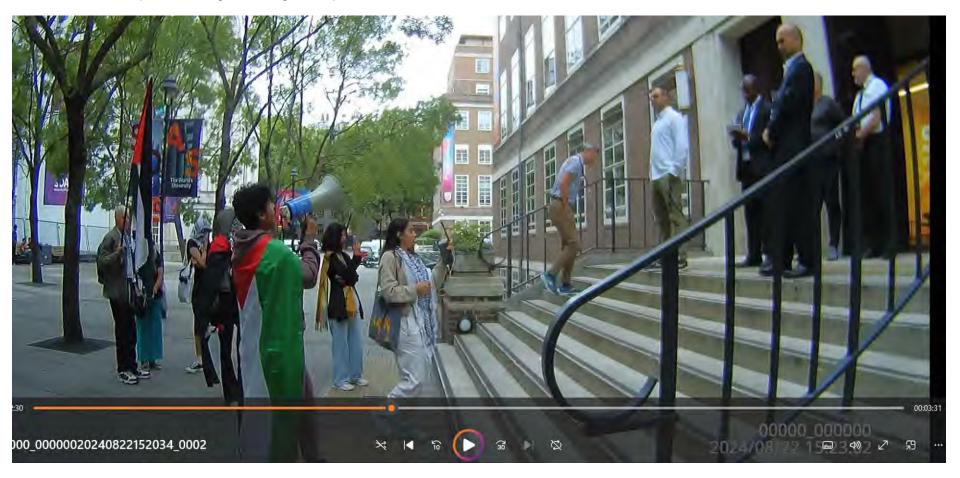
10.0

19 August 2024: Persons unknown trespassing upon Torrington Square. The First, Second and Third Defendants were not present during the filming of this protest.

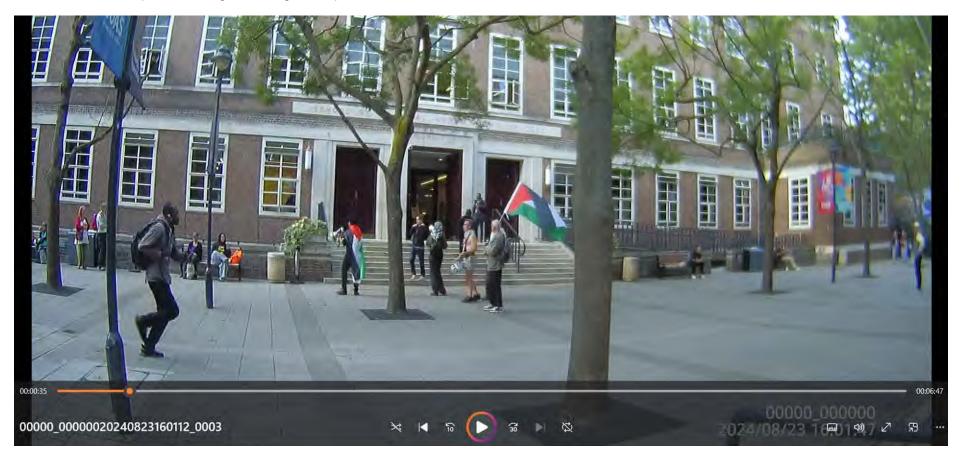




<u>22 August 2024:</u> Persons unknown trespassing upon Torrington Square and protesting outside a building occupied by SOAS. The First, Second and Third Defendants were not present during the filming of this protest



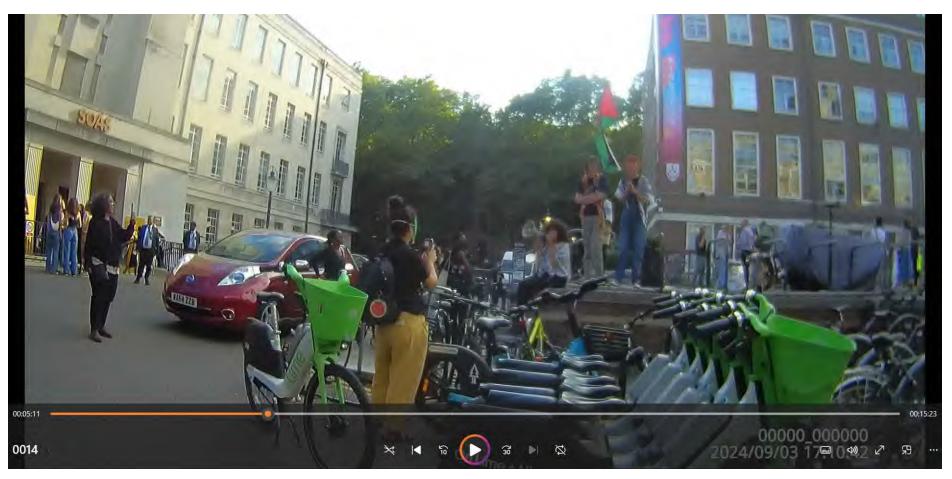
<u>23 August 2024:</u> Persons unknown trespassing upon Torrington Square and protesting outside a building occupied by SOAS. The First, Second and Third Defendants were not present during the filming of this protest

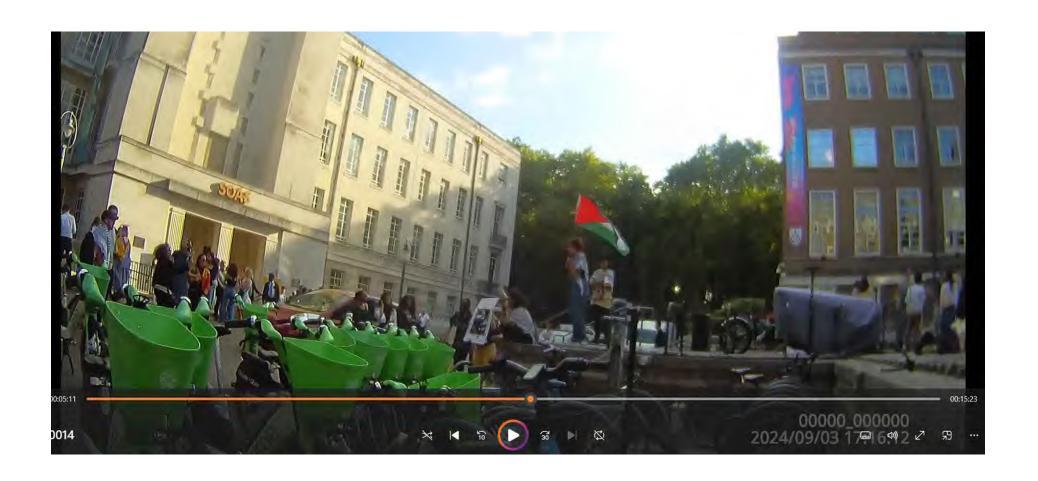


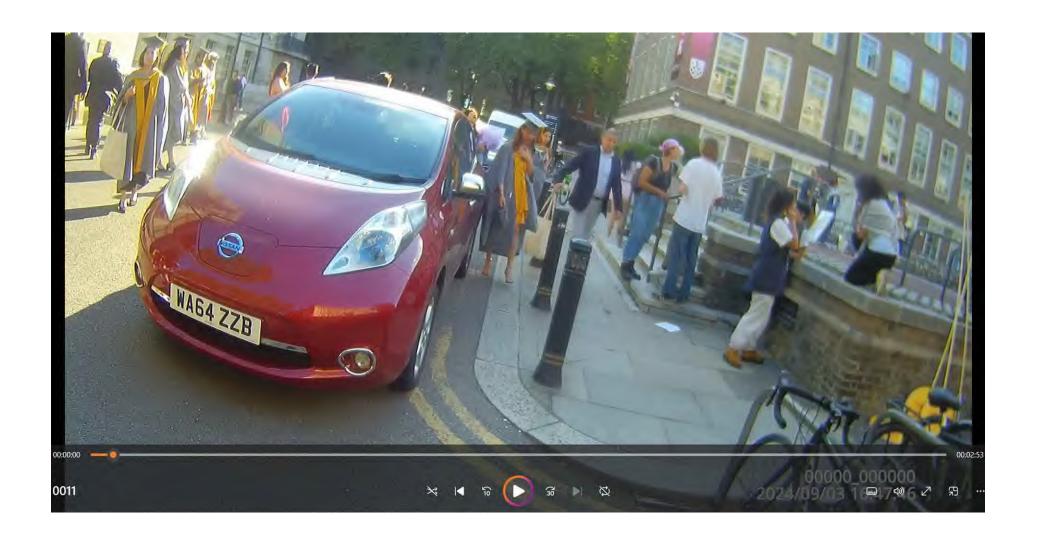
<u>1 September 2024:</u> Persons unknown trespassing upon Torrington Square and protesting outside a building occupied by SOAS. The First, Second and Third Defendants were not present during the filming of this protest.

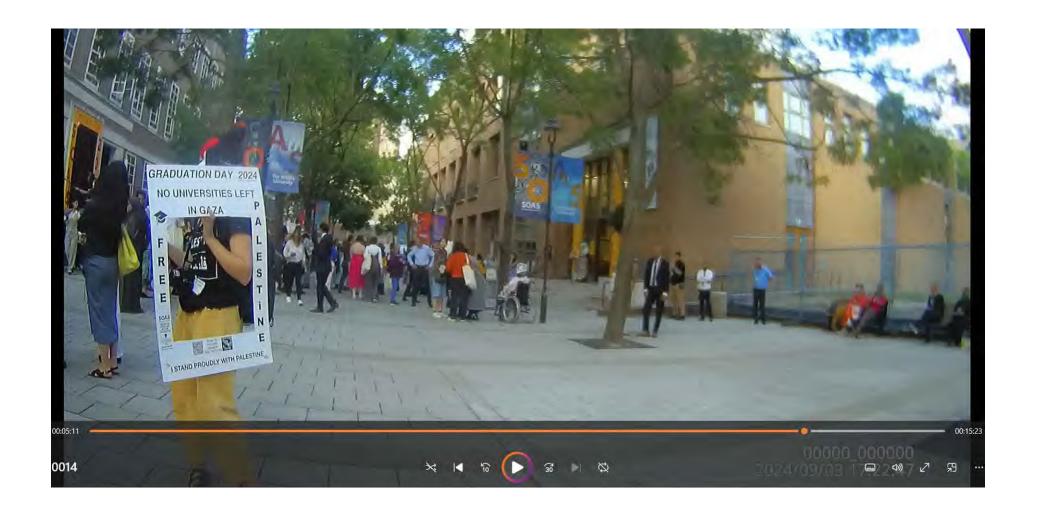


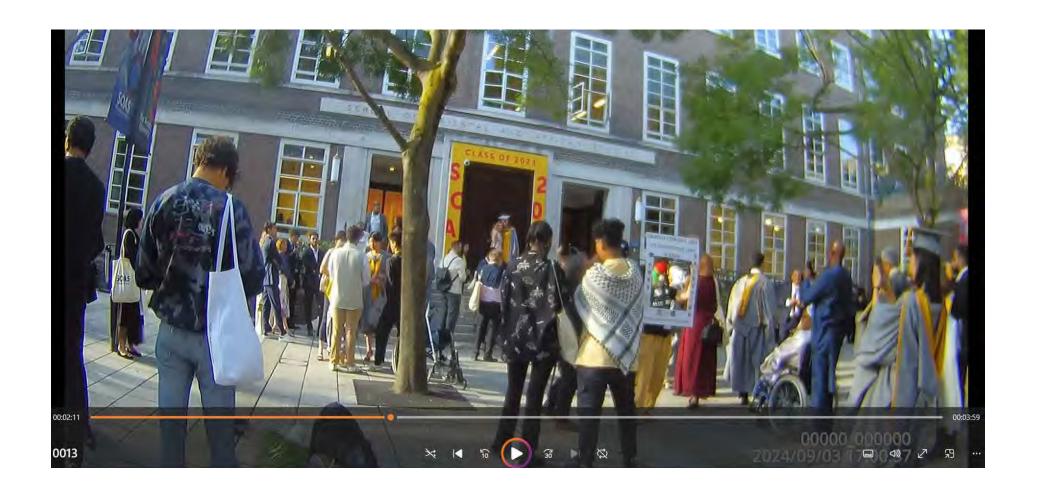
<u>3 September 2024:</u> Defendants trespassing upon Torrington Square and protesting outside a building occupied by SOAS during the period of a graduation ceremony for SOAS students. The Third Defendant can be seen seated and holding a megaphone in the first and second images below and kneeling on the right hand side of the third image. The other protestors are Persons Unknown.













<u>7 September 2024:</u> Persons unknown trespassing upon Torrington Square and protesting outside a building occupied by SOAS. The First, Second and Third Defendants were not present during the filming of this protest



23 September 2024: Defendants trespass upon Torrington Square, taking up occupation by setting up a gazebo there to continue their protest. The First Defendant can be seen on the right in the first image below. The Second Defendant is the person with the cropped hair and her back to the camera standing by the gazebo in the second image below. She is also the person standing next to the flag and looking sideways towards the camera in the third image below. The Third Defendant can also be seen in the second, third and fourth images below. She is the person who is immediately to the left of the index finger of the person holding the "Justice for SOAS Students" placard in the second image, the person wearing a red coloured shawl on the right hand side of the third image, and the person holding a piece of fruit in her hand in the fourth image. The others involved in the protest are Persons Unknown.









<u>24 September 2024:</u> Defendants trespass upon Torrington Square, taking up occupation by setting up a table there to continue their protest, with "flyers" handed out to passersby. The Third Defendant can be seen in the first image below. She is sideways on to the camera, wearing glasses and with a shawl over her shoulders. The Third Defendant can be seen more clearly in the second image below as she is facing the camera. The Second Defendant who has close cropped hair can also be seen on the left hand side of the second image below. The other protestors with them are Persons Unknown.

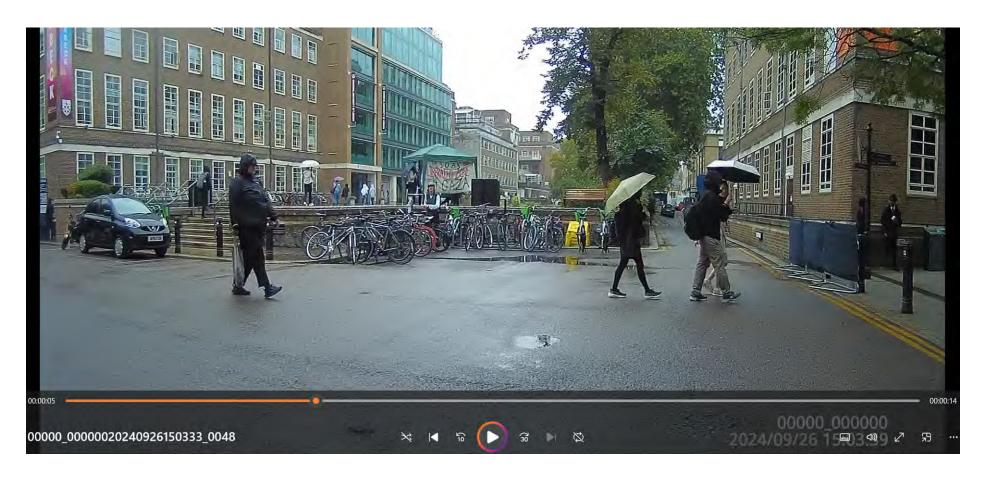




25 September 2024: Defendants trespass upon Torrington Square, taking up occupation by setting up a table there to continue their protest, with "flyers" handed out to passersby. The individual on the far right of the screenshot resembles the Second Defendant but the others are Persons Unknown.



26 September 2024: Defendants trespass upon Torrington Square, taking up occupation by setting up a gazebo there to continue their protest.

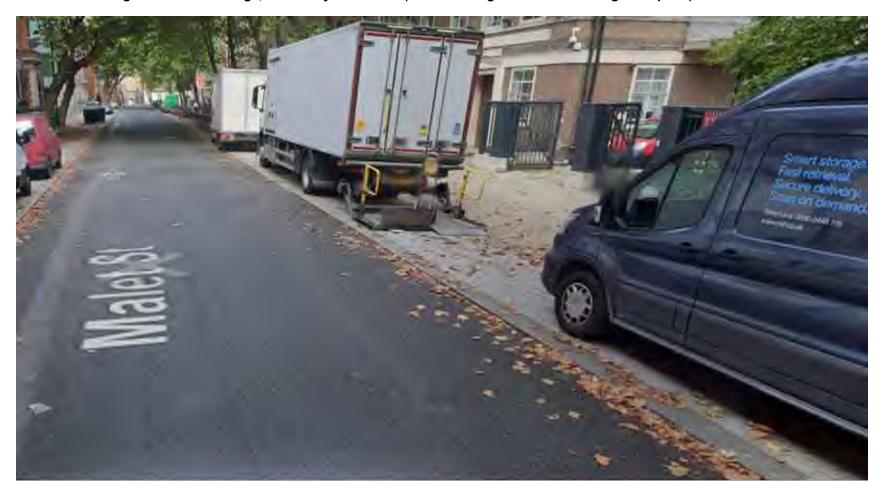


A Virtual Tour

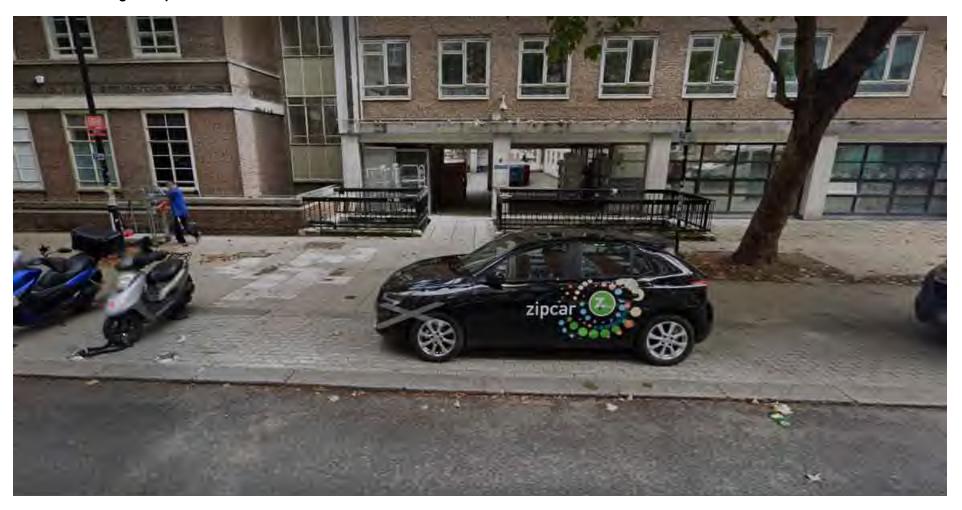
Access to Torrington Square from Malet Street



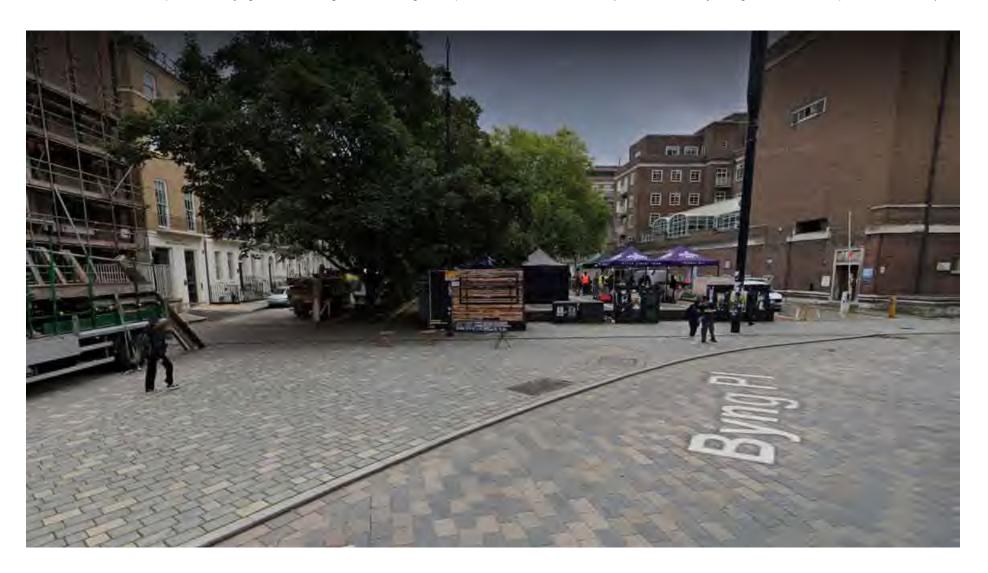
Access to main building of Birkbeck College, University of London (main building fronts onto Torrington Square)



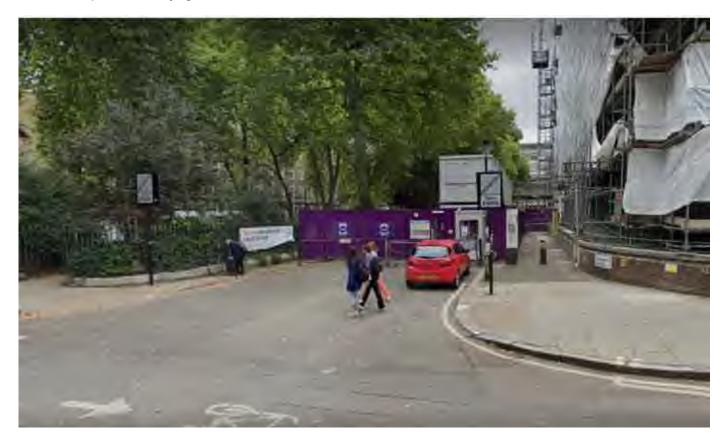
Access to Torrington Square from Malet Street



View from Third Encampment on Byng Place looking down Torrington Square towards North Block (the Paul Webley Wing, a focus of the protest activities)



View looking down Woburn Square from Byng Place



View looking down Woburn Square from Byng Place



View of location of Second Encampment on left of image having walked from Woburn Place



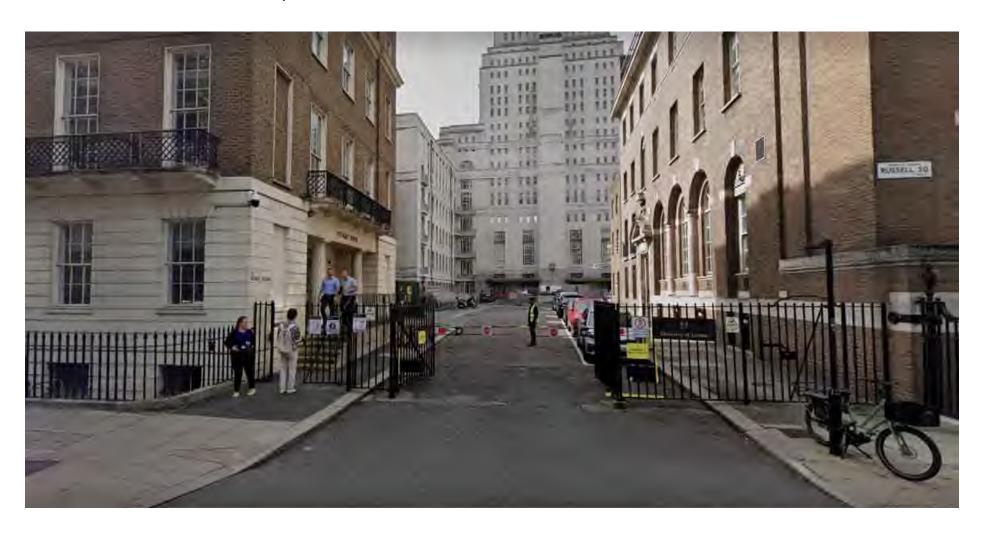
Thornhaugh Street with view of gates giving access to Torrington Square



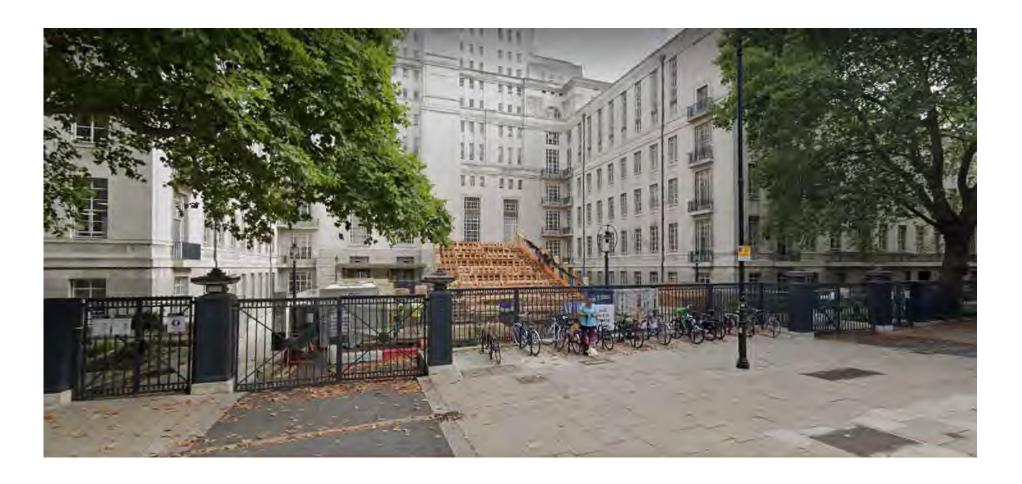
Gates giving access to Torrington Square



Access to Senate House from Russell Square



Access to Senate House from Malet Street

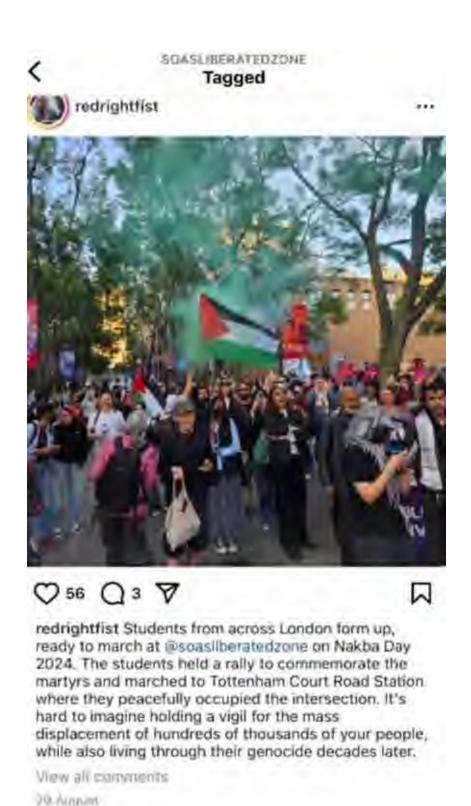


IN THE HIGH COURT OF JUS	TICE	Claim No. [1
BUSINESS AND PROPERTY	COURTS		
OF ENGLAND AND WALES (ChD)		
PROPERTY, TRUSTS AND PR	ROBATE LIST		
BETWEEN:-			
	THE UNIVERSITY OF LONDON		Claimant
	-and-		
SANCTIONS PROT DEMOCRATISE EL CONSENT OF TH	(1) ABEL HARVIE-CLARK (2) TARA MANN (3) HAYA ADAM N WHO, IN CONNECTION WITH E ESTS BY THE 'SOAS LIBERATED DUCATION' MOVEMENTS, ENTER E CLAIMANT UPON ANY PART O SCHEDULE 1)	O ZONE FOR GAZA R OR REMAIN WITI OF THE LAND (DEF	A' AND/OR HOUT THE FINED IN
	N WHO, IN CONNECTION WITH E ESTS BY THE 'SOAS LIBERATED		

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29 August 2024: Student march beginning by 4th Quadrant on Claimant's land in which the participants are trespassing on that land as no permission was sought to hold the assembly on the Claimant's land or to march form there.



<u>3 September 2024:</u> Post advertising meeting at friend's House on Euston Road (not land belonging to the Claimant) to disrupt a SOAS graduation ceremony and advertising a rally called a "Rally for a Degree of Dignity" on 5 September 2024.



♥ 221 Q ₹ 25

soasliberatedzone Help us hold SOAS accountable at this year's graduation! We will be selling flags for people to carry whilst getting their degrees, we encourage all the graduates to bring flags, kuffryehs, banners etc to show solidarity with our Palestinian brothers and sisters.

On September 3rd, 4th and 5th the class of 2024 will be graduating from SOAS - we must honour the martyrs that cannot graduate and remember that the education we celebrate on these days is paid for in Palestinian blood.

How can you help?

Come to Friends House Euston from 10:00am onwards on any/all of these days to get involved in the SLZ's alternative graduation activities.

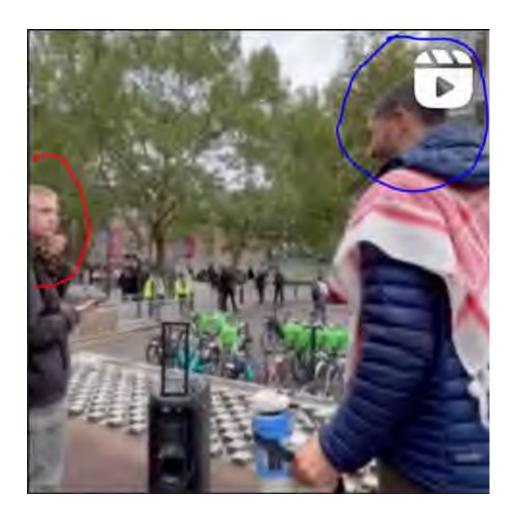
Come to our Rally for A Degree of Dignity at 12:00pm on Thursday the 5th.

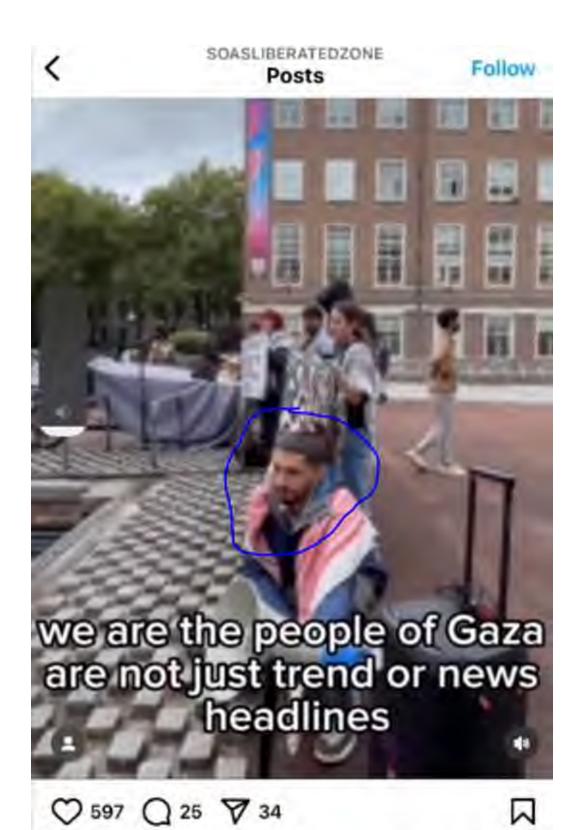
3. Swigstermoon

<u>5 September 2024:</u> First, Second and Third Defendants outside Friends House engaged in protest activities.



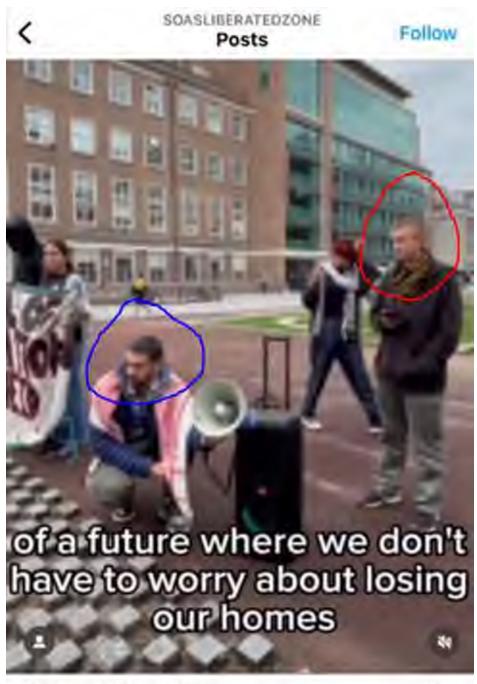
<u>5 September 2024:</u> First, Second, and Third Defendants and Persons Unknown trespassing on the Claimant's land at Torrington Square in connection with a rally called a "Rally for a Degree of Dignity".





soasliberatedzone Last week we protested in solidarity with all the Palestinians who were unable to graduate this year in Gaza since all universities in Gaza... more

View all comments



♥ 597 Q 25 🔻 34

soasliberatedzone Last week we protested in solidarity with all the Palestinians who were unable to graduate this year in Gaza since all universities in Gaza... more

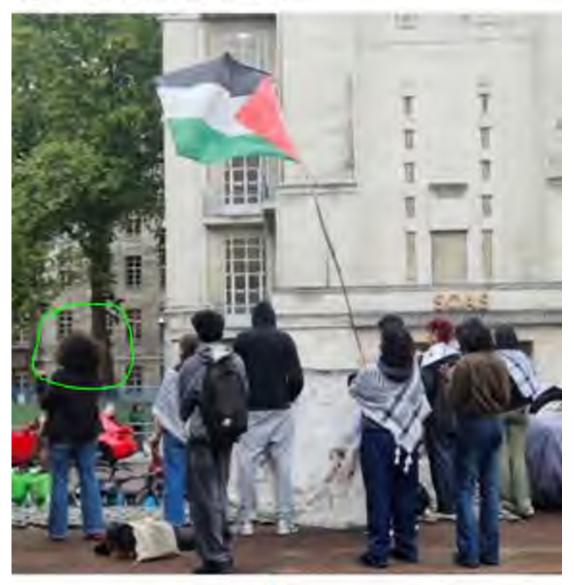
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SOASLIBERATEDZONE

Tagged



redrightfist and soasliberatedzone SOAS University of London









redrightfist @soasliberatedzone for Gaza demonstrate during SOAS graduation ceremony to highlight the complicity of the institution in the Gaza genocide.

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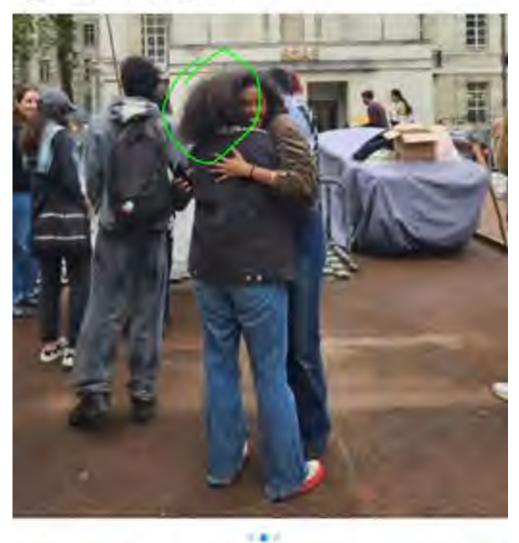
SOASLIBERATEDZONE

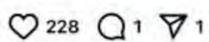
Posts





redrightfist and soasliberatedzone SOAS University of London



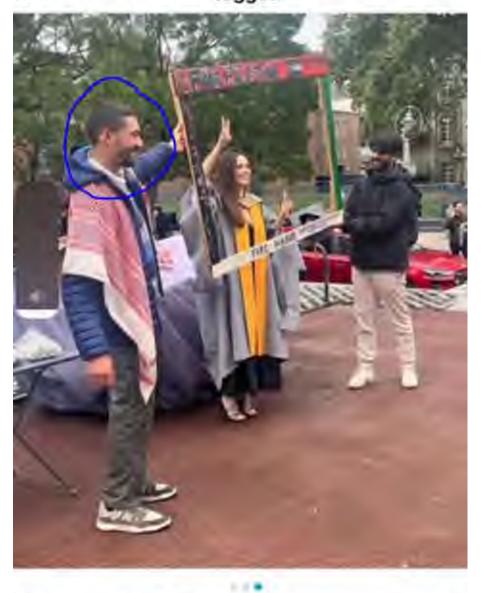




redrightfist @soasliberatedzone for Gaza demonstrate during SOAS graduation ceremony to highlight the complicity of the institution in the Gaza genocide.

View all comments

SOASLIBERATEDZONE Tagged







bashy_soomar Everyone has their favourite thing to do when they travel to different parts of the world.

Mine is to find the local resistance and protest imperialism and g-syde alongside them

¥ 24/7

View all comments

<u>Various:</u> Advertisements for a mass protest planned to take place on 27 September 2024 to coincide with SOAS' Freshers' Fayre. SOAS cancelled its planned Freshers' Fayre.













soasliberatedzone Welcome to SOAS: a colonial institution complicit in the colonisation and genocide of the Palestinian people

SJOIN OUR FRESHERS ACTIVITIES!

Hold SOAS accountable from day one - join the struggle to end university complicity in genocide and colonisation!

Join the mass protest this Friday to hold SOAS accountable from day one!









soasliberatedzone We the SOAS community refuse to be complicit in genocide and colonisation!

We will not be intimidated!

Let's build STUDENT POWER!

Join us on Friday 27th for a mass freshers protest to show SOAS that we will continue to fight for Palestinian Liberation and until SOAS divests ties from genocide.

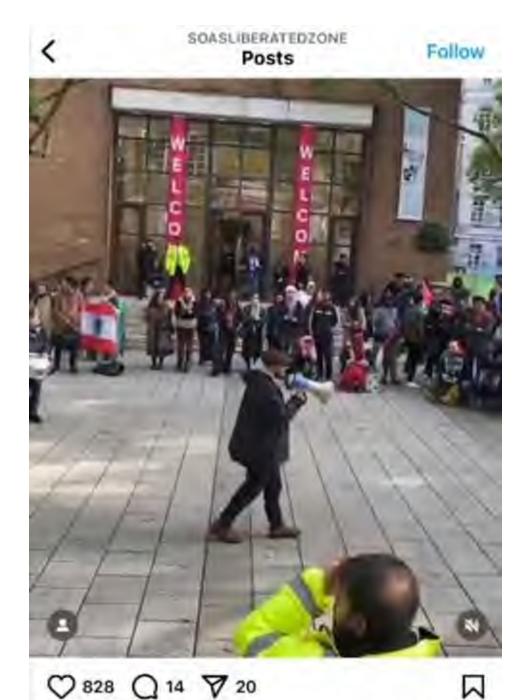
Disclose, divest, we will not stop, we will not rest!

View all comments

35 Smill bu

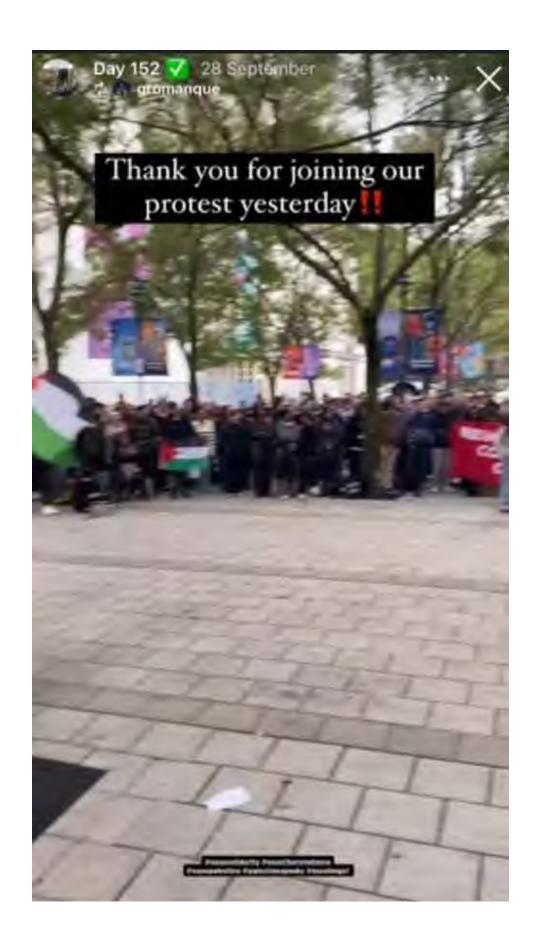
27 September 2024: Mass protest which took place on the Claimant's Land despite SOAS cancelling its Freshers' Fayre.

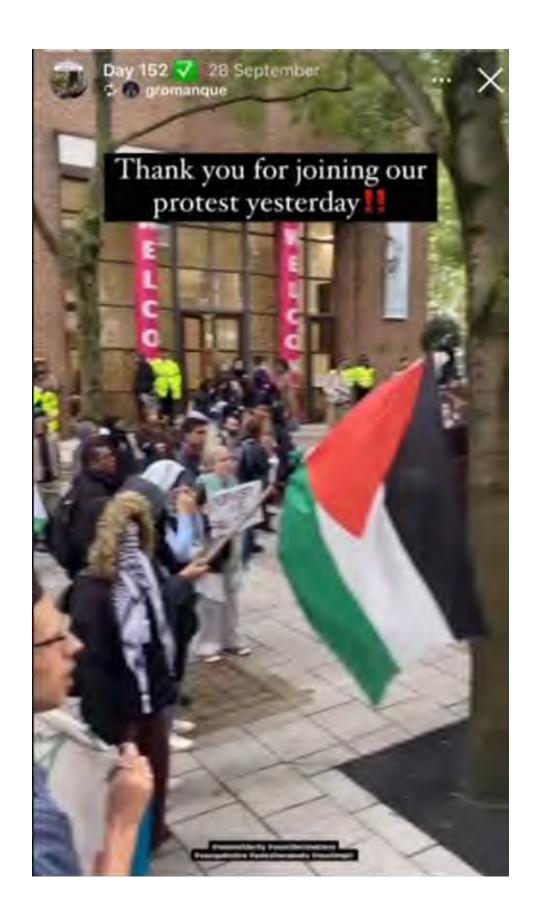


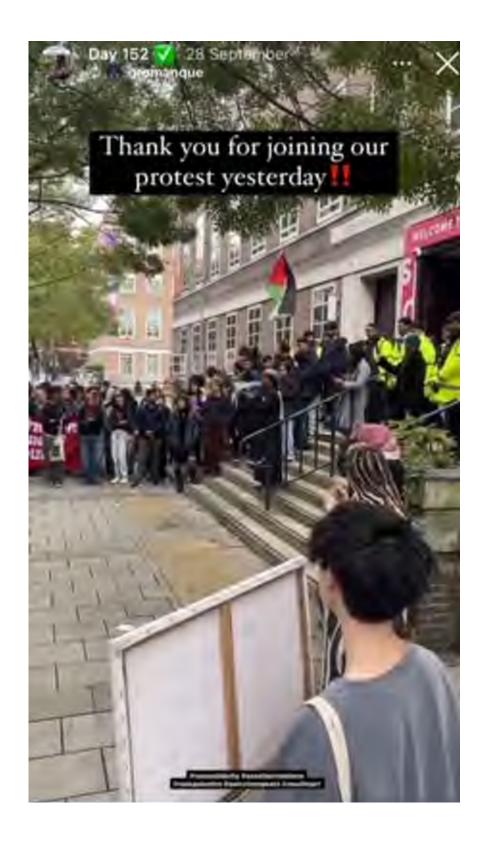


soasliberatedzone Today with the first protest of the year the message is clear—The SOAS community refuses to be complicit in the escalating genocide! We will not stop until SOAS STOPS THE COMPLICITY. Come and join us !!

View all comments 27 September

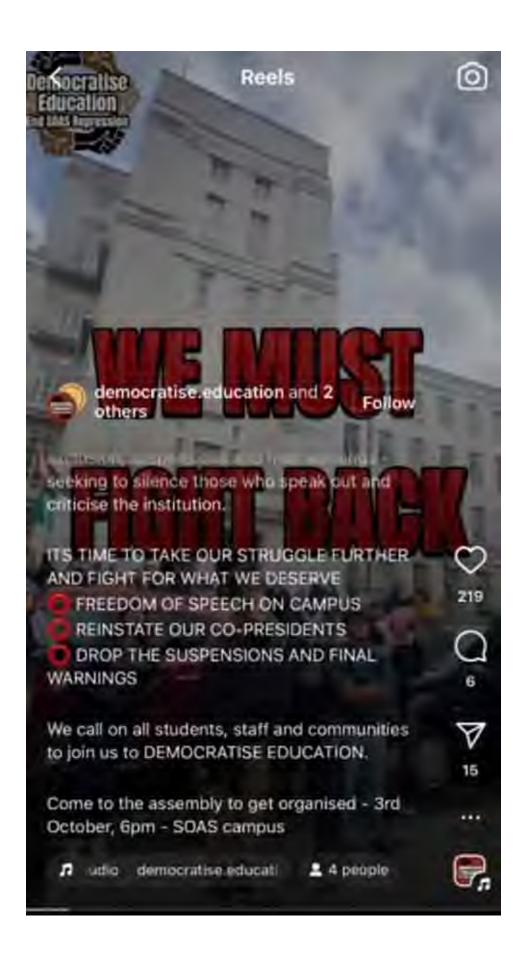


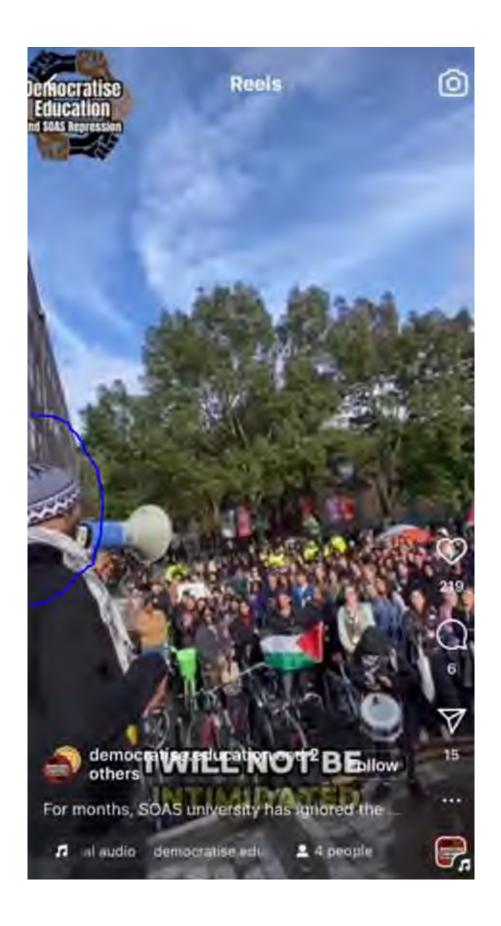




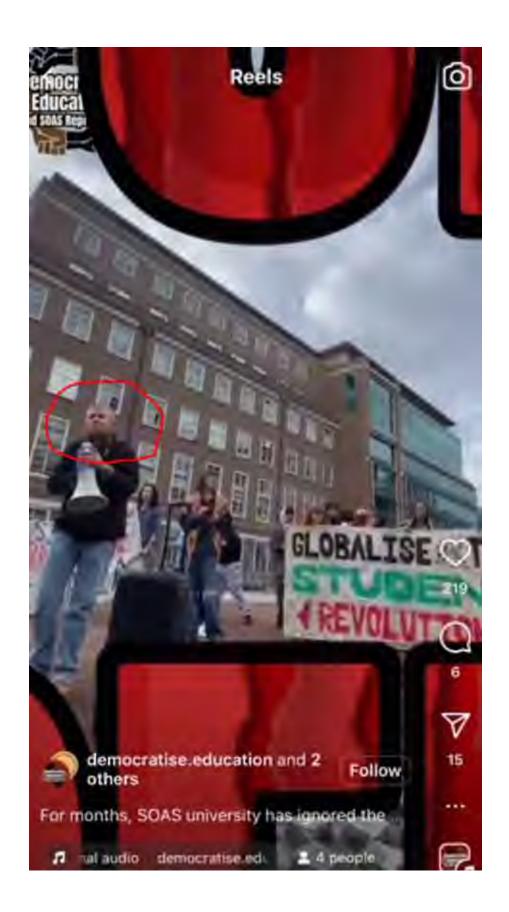
<u>Undated:</u> Advertisements for an assembly on the SOAS campus at 6.00pm on 3 October 2024 which will inevitably be a trespass on the Claimant's land. The second takes the form of images from a video which shows the First, Second, and Third Defendants addressing rallies on dates unknown prior to the video where all participants were trespassing on the Claimant's land.

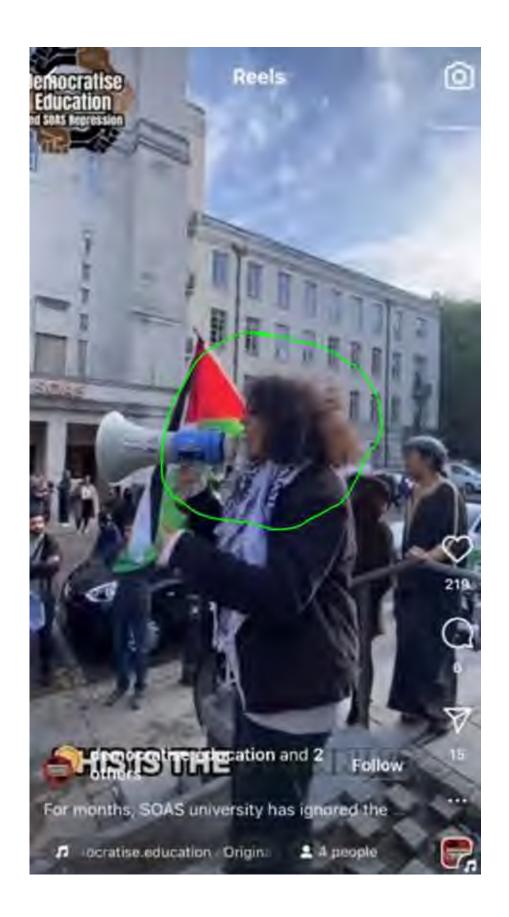






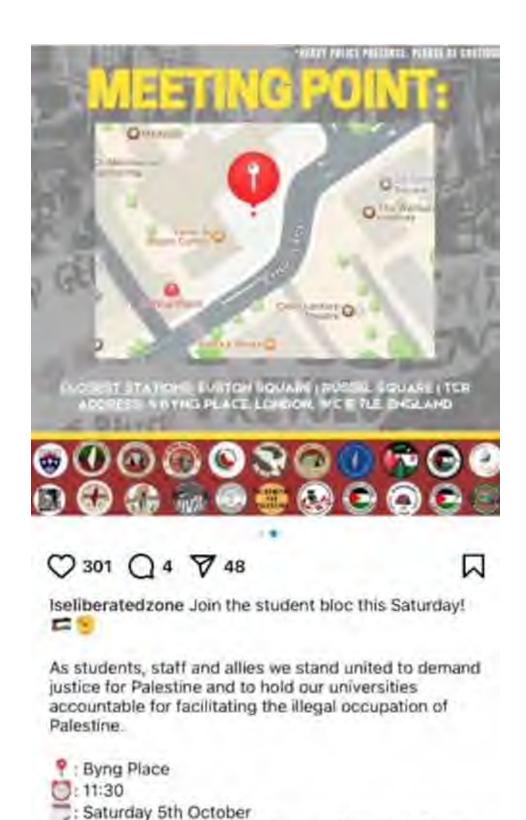






<u>Undated:</u> Advertisement for a protest march leaving at 11.30am from the Third Encampment. It would seem likely that the close proximity of Byng Place to premises of SOAS will mean that the protestors will trespass upon the Claimant's land.





Closest stations: Russell Square, Tottenham Court

<u>5 Ocotber 2024:</u> Protest march trespassing upon Torrington Square which is the subject of the Possession Orders





<u>Undated:</u> Advertisement for a protest rally on 10 October 2024 at 12.30pm



The students and staff united, will never be defeated.

A& Hours lego

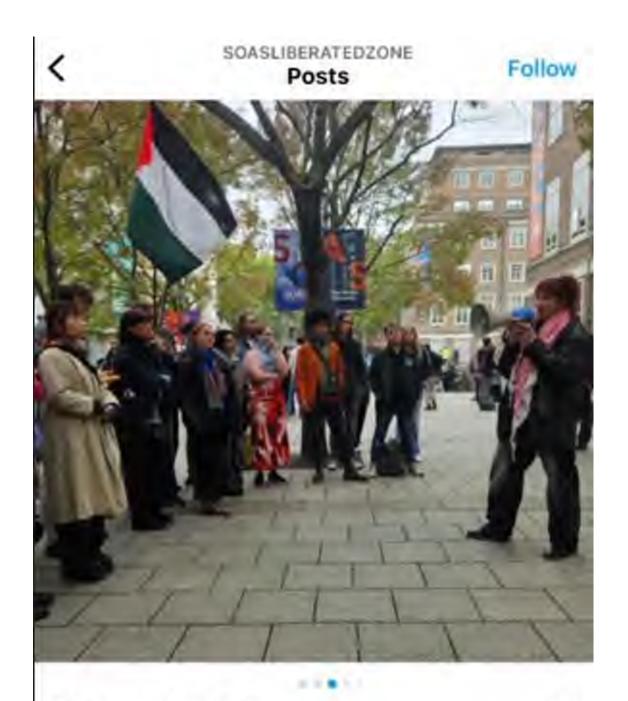
SOASLIBERATEDZONE Follow Posts





redrightfist SOAS Students reclaim the infamous steps during their staff and student rally today at the main university building.

2 hours ago



♥ 299 Q ₹ 5

redrightfist SOAS Students reclaim the infamous steps during their staff and student rally today at the main university building.

2 hours ago

SOASLIBERATEDZONE Follow Posts

♥ 299 Q ₹ 5

1-5.0 01

redrightfist SOAS Students reclaim the infamous steps during their staff and student rally today at the main university building.

2 hours ago

IN THE HIGH COURT OF JUSTICE	Claim No. [1
BUSINESS AND PROPERTY COURTS		
OF ENGLAND AND WALES (ChD)		
PROPERTY, TRUSTS AND PROBATE LIST		
BETWEEN:-		
THE UNIVERSITY OF LON	NDON	<u>Claimant</u>
-and-		
(1) ABEL HARVIE-CL (2) TARA MANN (3) HAYA ADAM (4) PERSONS UNKNOWN WHO, IN CONNECTION W SANCTIONS PROTESTS BY THE 'SOAS LIBER 'DEMOCRATISE EDUCATION' MOVEMENTS, E CONSENT OF THE CLAIMANT UPON ANY PA SCHEDULE 1 (5) PERSONS UNKNOWN WHO, IN CONNECTION W	I I VITH BOYCOTT, DIVE RATED ZONE FOR GA ENTER OR REMAIN W ART OF THE LAND (I)	AZA' AND/OR WITHOUT THE DEFINED IN
SANCTIONS PROTESTS BY THE 'SOAS LIBER		

'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)

EXHIBIT AJ13

Defendants

FROM: UOL BCP GOLD TEAM CHAIR

TO: UOL BCP GOLD TEAM

SENT: BY E-MAIL

Dear Gold Team,

Please find below the minute of the Gold Team's meeting of Thursday, 26 September 2024 where the Gold Team considered, and made a decision as to whether, the University of London ("**UOL**") should seek a precautionary injunction to restrain: -

- 1. the occupation and encampment by pro-Palestine protestors upon the UOL's land; and
- 2. the trespass by pro-Palestine protestors upon the UOL's land where such protests have not been approved in accordance with the UOL's Code of Practice on Meetings (the "Code").

Present:

Wendy Thomson, Vice-Chancellor Rita Akushie, Pro Vice-Chancellor (Finance and Operations) - Chair of Gold Team Phil Almendinger, Pro Vice-Chancellor (Education) Jo Fox, Pro Vice-Chancellor (Research and Public Engagement)

Apologies:

Alistair Jarvis, Pro Vice-Chancellor (Partnerships and Governance)

Location:

Hybrid - Online and in office

- 1. This meeting of the Gold Team has been convened in accordance with the UOL's Business Continuity Plan dated 14 December 2023 to allow the UOL to discuss, and decide whether to make, a strategic decision to restrain trespasses on its land ahead of the return of students of the UOL, and other federation members, at the end of September 2024.
- 2. The Gold Team discussed its previous decisions in relation to pro-Palestine occupations of its land and, specifically, they considered the Orders for Possession which the UOL obtained on 31 July 2024.
- 3. The Gold Team reviewed the minute of its decision to seek an order for possession dated 22 July 2024 alongside the recommendation that was made to the Gold Team by the Silver Team on 19 July 2024. The Gold Team noted that its decision took into account the UOL's Practice Statement on Free Speech and public law duties to protect free speech on campus and was made based upon the following considerations:
 - a. The UOL had not granted any express, or implied licence, to pro-Palestine protestors occupying the 4th Quadrant, Senate House;
 - b. The occupiers failed to seek the UOL's prior approval to occupy the UOL's land in contravention of the Code;
 - c. The occupiers failed to seek the UOL's approval to demonstrate on its land in contravention of the UOL's Visitor Regulations;

- d. The UOL suffered substantial property damage as a result of the occupation;
- e. The occupation was a focal point for incidents, intimidation, and escalation;
- f. The occupation caused health and safety risks to students, staff and the occupiers themselves;
- g. The occupation caused concerns for other members of the local community;
- h. The occupation caused interference with the UOL's operations; and
- i. The decision to disperse the encampment and occupiers was not based upon views of the occupiers.
- **4.** The Gold Team then discussed the subsequent conduct and occupations of the occupiers which was summarised as follows:
 - a. Once the UOL obtained the orders for possession, the original encampment dispersed on or around 4 August 2024; however, another encampment was then set up by the occupiers elsewhere on the UOL's land at and around Christchurch immediately thereafter.
 - b. This second encampment was subsequently dispersed by agents of the UOL on 7 August 2024, following which, the occupiers have relocated to Byng Place which neighbours, but falls outside of, the UOL's land.
 - c. The occupiers of this third encampment, however, are itinerant. They continue to trespass upon the UOL's land to demonstrate and protest *without* the UOL's approval or permission in contravention of the Code and the UOL's Visitor Regulations. Such transient protests have disrupted the UOL's operations including open days and graduation ceremonies.
 - d. The occupiers have continued to indicate that they will escalate their protests once the September term commences via their Instagram page which has the handle "soasliberatedzone". The Gold Team considered various Instagram posts and specifically noted a post dated 18 August 2024 where the occupiers stated:-

"they thought that these encampments were just a small point in student history. We will stay until our demands are met...we will continue to organise and mobilise specifically in relation to the new academic year".

- e. On or around 23 September 2024, the occupiers then set up a stand on Torrington Square with a Palestinian flag and banner which states "Educide in Gaza" as well as a sign which appeared to reiterate the occupiers' demands made previously an obvious escalation ahead of the resumption of term.
- 5. The Gold Team discussed that they consider there is a real and imminent threat of the protestors again encamping upon and occupying UOL's land; and a real and imminent threat of the protestors demonstrating on its land without seeking approval in accordance with the Code or the UOL's Visitor Regulations.
- **6.** The Gold Team then discussed that the issues and considerations they accounted for in their meeting of 22 July 2024, where they made the decision to seek an order for possession, all continue to be applicable. Specifically, the Gold Team had serious and substantive worries that future occupations and demonstrations on its land, without any due process under the Code being applied, would:
 - a. Seriously disrupt its operations during the busiest period of its year when new students commence their studies;

- b. Cause health and safety risks to students, staff and the occupiers themselves;
- c. Lead to substantial property damage like in previous cases of occupation;
- d. Once again become a focal point for intimidation and escalation;
- e. Cause concerns for members of the local community; and
- f. Force the UOL to incur substantial legal and / or security costs.
- 7. The Gold Team discussed the UOL's obligations under the Code, and under the Education (No.2) Act 1986 to protect free speech on campus; however, they noted that protestors have a legitimate avenue to protest they should seek sanction by the UOL pursuant to the Code and / or the Visitor Regulations to ensure that the right to free speech is appropriately balanced with the UOL's needs to protect its operations (and the education of students) and to protect other staff and students.
- **8.** To protect the UOL's operations, and its staff and students, the Gold Team then, unanimously, made the decision to seek a precautionary injunction to restrain:
 - a. the occupation and encampment by pro-Palestine protestors upon the UOL's land; and
 - b. the trespass by pro-Palestine protestors upon the UOL's land where such protests have not been approved in accordance with the Code or the UOL's Visitor Regulations.
- 9. The Silver Team expressly noted that its recommendation to seek a precautionary injunction was taken whilst considering and balancing the UOL's duties and obligations in relation to freedom of speech including the UOL's duties under section 43 of the Education (No.2) Act 1986, the Code, and the UOL's Practice Statement on Free Speech. The Gold Team noted that the same decision would have been made if the protests related to any other cause due to the reasons discussed.

Signed by Chair of Gold Team
Sent by and on behalf of the Gold Team

IN THE HIGH COURT OF	JUSTICE		Claim No. [1
BUSINESS AND PROPEI	RTY COURTS			
OF ENGLAND AND WAL	ES (ChD)			
PROPERTY, TRUSTS AN	D PROBATE LIST			
BETWEEN:-				
	THE UNIVERS	ITY OF LONDON		<u>Claimant</u>
	-a	ınd-		
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'DEMOCRATISE EDUCATION' MOVEMENTS, ERECT ANY TENT OR OTHER STRUCTURE, WHETHER PERMANENT OR TEMPORARY, ON ANY PART OF THE LAND (DEFINED IN SCHEDULE 1)

EXHIBIT AJ14



London Security Services (UK) Limited

Pinnell Road London 02082941444

accounts@lss-security.co.uk

www.lss-security.co.uk

VAT Registration No.: 200828933

INVOICE TO

University of London Malet Street London London WC1E 7HU

INVOICE 170 UoL(AMENDED)

DATE 31/07/2024 TERMS 30 days from invoice date

DUE DATE 30/08/2024

ACTIVITY	QTY	VAT	RATE	AMOUNT
SIA Security Doorman 'VARIOUS JOBS 1' Security Service at University of London, SENATE HOUSE, Mallet Street, London. WC1E 7HY from 01/07/2024 to 31/07/2024 (PROTEST OFFICERS)	1,679	20.0% S	19.25	32,320.75
		SUBTOTAL		32,320.75
		VAT TOTAL		6,464.15
		TOTAL		38,784.90
		TOTAL DUE	£	38,784.90

VAT SUMMARY

RATE	VAT	NET
VAT @ 20%	6,464.15	32,320.75

All Payments to:

London Security Services (UK) Limited Barclays Bank PLC Account Number: 90045888 Sort Code: 20-29-63



University of London Senate House Malet Street London WC1E 7HU Invoice Date 13 Aug 2024

Invoice Number SB-2710

Reference SLC308610

VAT Number 273 7933 67

Shergroup Ltd 20 St. Andrews Street, Holborn, London EC4A 3AG

Tel: +44 (0) 845 890 9200

Email:

enquiries@shergroup.com

Description	Quantity	Unit Price	VAT	Amount GBP
25 Enforcement Officers on site from 09.30 am till 11.30 am	25.00	400.00	20%	10,000.00
Ref:- University of London, Senate House, Malet St, London, WC1E 7HU				
			Subtotal	10,000.00
		TC	TAL VAT	2,000.00
		TC	TAL GBP	12.000.00

Due Date: 27 Aug 2024

The debt represented by this invoice has been purchased and assigned to:

Optimum SME Finance Limited and they alone can give you a valid discharge of this debt.

Payment should be made to the following:
Optimum SME Finance Limited
Cube M4 Business Park, Old Gloucester Road, Bristol, BS16 1FX

Account Name: Shergroup Ltd

Sort Code: 16-22-11 Account No: 11128975

Payment must be made within 14 days of the date of this invoice quoting the invoice reference.

Late Fees:

Overdue payments will incur statutory interest charged at 8% of the invoice total plus the Bank of England base rate.



To: Shergroup Ltd 20 St. Andrews Street, Holborn, London EC4A 3AG

> Tel: +44 (0) 845 890 9200 Email: enquiries@shergroup.com

Customer	University of London
Invoice Number	SB-2710
Amount Due	12,000.00
Due Date	27 Aug 2024
Amount Enclosed	
	Enter the amount you are paying above



University of London Senate House Malet Street London WC1E 7HU Invoice Date 13 Aug 2024

Invoice Number SS-3370

Reference SLC308610

VAT Number 273 7933 67

Shergroup Ltd 20 St. Andrews Street, Holborn, London EC4A 3AG

Tel: +44 (0) 845 890 9200

Email:

enquiries@shergroup.com

Description	Quantity	Unit Price	VAT	Amount GBP
04 Security Guard on Site from 07.08.2024 at 11.30 am till 08.08.2024 at 11.30 am	24.00	400.00	20%	9,600.00
04 Security Guard on Site from 08.08.2024 at 11.30 am till 09.08.2024 at 11.30 am	24.00	400.00	20%	9,600.00
04 Security Guard on Site from 09.08.2024 at 11.30 am till 10.08.2024 at 11.30 am	24.00	400.00	20%	9,600.00
04 Security Guard on Site from 10.08.2024 at 11.30 am till 11.08.2024 at 11.30 am	24.00	400.00	20%	9,600.00
04 Security Guard on Site from 11.08.2024 at 11.30 am till 12.08.2024 at 10.00 pm	34.50	400.00	20%	13,800.00
Ref:- University of London, Senate House, Malet St, London, WC1E 7HU				
			Subtotal	52,200.00
		TO	TAL VAT	10,440.00
		TO	TAL GBP	62,640.00

Due Date: 27 Aug 2024

The debt represented by this invoice has been purchased and assigned to:

Optimum SME Finance Limited and they alone can give you a valid discharge of this debt.

Payment should be made to the following:
Optimum SME Finance Limited
Cube M4 Business Park, Old Gloucester Road, Bristol, BS16 1FX

Account Name: Shergroup Ltd

Sort Code: 16-22-11 Account No : 11128975

Payment must be made within 14 days of the date of this invoice quoting the invoice reference.

	Fees.

Overdue payments will incur statutory interest charged at 8% of the invoice total plus the Bank of England base rate.

PAYMENT ADVICE

To: Shergroup Ltd 20 St. Andrews Street, Holborn, London EC4A 3AG

Tel: +44 (0) 845 890 9200 Email: enquiries@shergroup.com

Customer	University of London
Invoice Number	SS-3370
Amount Due	62,640.00
Due Date	27 Aug 2024
Amount Enclosed	
	Enter the amount you are paying above



University of London Attention of : Glenn Marree

Senate House Malet Street London WC1E 7HU Invoice Date 7 Aug 2024

Invoice Number SB-2706

Reference SLC308610

VAT Number 273 7933 67

Shergroup Ltd 20 St. Andrews Street, Holborn, London EC4A 3AG

Tel: +44 (0) 845 890 9200

Email:

enquiries@shergroup.com

Description	Quantity	Unit Price	VAT	Amount GBP
Gold Command AHCEO liaison with Police Gold Commander	1.00	1,200.00	20%	1,200.00
Silver Command AHCEO liaison with Police Gold Commander	1.00	1,000.00	20%	1,000.00
TEAM A Enforcement Agents	30.00	800.00	20%	24,000.00
Ref:- University of London, Senate House, Malet St, London, WC1E 7HU				
			Subtotal	26,200.00
		TC	OTAL VAT	5,240.00
		TC	OTAL GBP	31,440.00

Due Date: 21 Aug 2024

The debt represented by this invoice has been purchased and assigned to:

Optimum SME Finance Limited and they alone can give you a valid discharge of this debt.

Payment should be made to the following: Optimum SME Finance Limited

Cube M4 Business Park, Old Gloucester Road, Bristol, BS16 1FX

Account Name : Shergroup Ltd

Sort Code: 16-22-11 Account No : 11128975

Payment must be made within 14 days of the date of this invoice quoting the invoice reference.

Late Fees:

Overdue payments will incur statutory interest charged at 8% of the invoice total plus the Bank of England base rate.



To: Shergroup Ltd

20 St. Andrews Street, Holborn, London

EC4A 3AG

Tel: +44 (0) 845 890 9200 Email: enquiries@shergroup.com Customer University of London
Invoice Number SB-2706

Amount Due 31,440.00
Due Date 21 Aug 2024

Amount Enclosed

Enter the amount you are paying above



University of London Senate House Malet Street London WC1E 7HU Invoice Date 13 Aug 2024

Invoice Number SB-2709

Reference SLC308610

VAT Number 273 7933 67

Shergroup Ltd 20 St. Andrews Street, Holborn, London EC4A 3AG

Tel: +44 (0) 845 890 9200

Email:

enquiries@shergroup.com

Description	Quantity	Unit Price	VAT	Amount GBP
Removal Charges	1.00	9,999.00	20%	9,999.00
Ref:- University of London, Senate House, Malet St, London, WC1E 7HU				
			Subtotal	9,999.00
		T	OTAL VAT	1,999.80
		Т	OTAL GBP	11.998.80

Due Date: 27 Aug 2024

The debt represented by this invoice has been purchased and assigned to:

Optimum SME Finance Limited and they alone can give you a valid discharge of this debt.

Payment should be made to the following:
Optimum SME Finance Limited
Cube M4 Business Park, Old Gloucester Road, Bristol, BS16 1FX

Account Name: Shergroup Ltd

Sort Code: 16-22-11 Account No : 11128975

Payment must be made within 14 days of the date of this invoice quoting the invoice reference.

Late Fees:

Overdue payments will incur statutory interest charged at 8% of the invoice total plus the Bank of England base rate.



To: Shergroup Ltd

20 St. Andrews Street, Holborn, London

EC4A 3AG

Tel: +44 (0) 845 890 9200 Email: enquiries@shergroup.com Customer University of London
Invoice Number SB-2709

Amount Due 11,998.80

Due Date 27 Aug 2024

Amount Enclosed

Enter the amount you are paying above

Cam Specialist Support Limited Unit 21, Malham Industrial Estate Malham Road London SE23 1AH



Page 1

University Of London Senate House Malet St London WC1E 7HU

Invoice Number

24772

Invoice Date

30/09/2024

Quantity Details

Unit Price

Net Amt

VAT %

VAT

1.00 Cleaning carried out in August 2024 as per PO No: 20039845

PTW 201883

To carry out the graffiti removal from the floor by the SOAS university as shown in the photos provided.

Site Address 10 Thornhaugh Street London WC1H 0XG

1,515.50

1,515.50

20.00

303.10

Total Net Amount 1,515.50

Carriage Net 0.00

Total Tax Amount 303.10

Invoice Total 1,818.60

Terms of Trade: Strictly 30 days from date of Invoice

Bank details:

CAM SPECIALIST SUPPORT LIMITED

SORT CODE: 40-44-37 ACCOUNT NO:81789767

COMPANY DETAILS:

VAT NUMBER: 260 8287 92 COMPANY NUMBER:03873761

CAM Specialist Support | Unit 21 Malham Road Industrial Estate | Malham Road | Forest Hill | Langer | SE23 1AH T: 0205411 7211 | P: 020 3411 7210 | E: sales@camsupport.co.uk | W: www.camsupport.co.uk

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