

**CLAIM NO: PT-2024-000893**

## PROPERTY, TRUSTS AND PROBATE LIST

On: [ ]

**THE UNIVERSITY OF LONDON**

**and**

**(3) HAYA ADAM**

**(5) PERSONS UNKNOWN WHO, IN CONNECTION WITH BOYCOTT, DIVESTMENT, AND SANCTIONS PROTESTS ON THE LAND (DEFINED IN SCHEDULE 1) 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**

## Defendants

## DRAFT ORDER

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**UPON HEARING** Miss Briggs, of counsel, for the Claimant, and [ ].

**AND UPON** the Court considering the Order of Adam Johnson J dated 16 October 2024 (as amended pursuant to CPR 40.12 and as varied by paragraph 3 of the order made by Master Pester dated 13 December 2024) ("**the Alternative Service Order**").

**AND UPON** the Court considering the Order of Nicholas Thompsell J dated 30 October 2024 (amended on 13 November 2024 pursuant to CPR 40.12) ("**the Interim Injunction Order**").

**AND UPON** the Court considering the Order of Master Pester dated 13 December 2024.

**AND UPON** hearing the Claimant's application dated 30 July 2025 to amend its Particulars of Claim dated 14 October 2024 and the Interim Injunction Order and to dispense with service of a sealed copy of that application upon the Defendants pursuant to CPR 6.28 ("**the Application**").

**AND UPON** the Court considering the witness statement of Matthew Grigson dated 30 July 2025 filed in support of the Application.

**AND UPON** the Court noting that, whilst the Defendants have not been served with a sealed copy of the Application and the documents filed in support thereof in accordance with CPR Part 23, the Defendants were nevertheless served with an unsealed copy of the Application and the documents filed in support thereof on 30 July 2025.

**AND UPON** the Court considering the Court file.

**AND IT IS ORDERED THAT:**

1. The Claimant shall be permitted to amend its Particulars of Claim in the form of the draft attached to the Application.
2. The Amended Particulars of Claim shall be verified by a statement of truth.
3. By [7 days after sealed order] 2025, the Amended Particulars of Claim shall be filed at Court and served on the Defendants. Service of the Amended Particulars of Claim shall be effected in accordance with paragraphs 1(a), 1(b) and 1(c) of the Alternative Service Order, save that, in respect of the First, Second, and Third Defendants, service shall be effected upon their solicitors, Bindmans LLP, and the Claimant is not required to serve the Amended Particulars of Claim upon them at the email addresses for them set out in Schedule 2 to the Alternative Service Order.
4. The First, Second, and Third Defendants shall be permitted to amend their Defence to set out their case in relation to the compliance or otherwise of the Claimant's "Freedom of Speech & Academic Freedom Code of Practice" ("**the FOS Code**") with section 43 of the Education (No.2) Act 1986), Part A1 of the Higher Education and Research Act 2017, and/or Articles 10 and 11 of the

European Convention on Human Rights. Any such amended Defence must be filed at Court and served upon the Claimant by [insert date which is 14 days after service of the amended Particulars of Claim].

5. The Fourth, Fifth and Sixth Defendants (if so advised) be permitted to file a Defence to the Claimant's Amended Particulars of Claim. Any such defence to be filed at Court and served upon the Claimant by [insert date which is 14 days after service of the amended Particulars of Claim].
6. The Claimant shall (if so advised) serve an Amended Reply to any Amended Defence served by the First, Second, and Third Defendants and to serve a Reply to any Defence served by the Fourth, Fifth, and Sixth Defendants. Any such Amended Reply or Reply must be filed at Court and served upon the Defendants by [insert date which is 14 days after service of the amended Defence or Defence referred to in paragraphs 4 and 5 above].
7. The Interim Injunction Order shall be varied in accordance with the version appended hereto at enclosure 1.
8. Service of this Order is to be effected by the Claimant in accordance with paragraphs 1(a), 1(b) and 1(c) of the Alternative Service Order, save that in respect of the First, Second, and third Defendants, service of the order is to be effected upon their solicitors, Bindmans LLP, and the Claimant is not required to serve the order upon them at the email addresses for them set out in Schedule 2 to the Alternative Service Order.
9. Service of the Application upon the Defendants be dispensed with. As the Defendants have not been served with a copy of this Order before it was made, they may apply, pursuant to CPR 23.10, to set aside or vary this Order within seven days of it being served upon them.
10. Save that Defendants' costs of and consequential to the amendments to the Particulars of Claim are to be paid by the Claimant in any event, costs in the case.

### **Service of this Order**

The Court has provided a sealed copy of this order to the serving party legal representatives:

Pinsent Masons LLP  
55 Colmore Row  
Birmingham  
B3 2FG  
Ref:AF02/630232.07557/CD38/CM80

**ENCLOSURE 1**

**IN THE HIGH COURT OF JUSTICE**

**Claim No.PT-2024-000893**

**BUSINESS AND PROPERTY COURTS**

**OF ENGLAND AND WALES (ChD)**

**PROPERTY, TRUSTS AND PROBATE LIST**

**Before: Mr Justice Thompsell**

**On: 30 October 2024**

**B E T W E E N:-**

**THE UNIVERSITY OF LONDON**

**Claimant**

**-and-**

**(1) ABEL HARVIE-CLARK**

**(2) TARA MANN**

**(3) HAYA ADAM**

**(4) PERSONS UNKNOWN WHO, IN CONNECTION WITH BOYCOTT, DIVESTMENT, AND SANCTIONS PROTESTS ON THE LAND (DEFINED IN SCHEDULE 1) 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**

**(5) PERSONS UNKNOWN WHO, IN CONNECTION WITH BOYCOTT, DIVESTMENT, AND SANCTIONS PROTESTS ON THE LAND (DEFINED IN SCHEDULE 1) 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**

**(6) PERSONS UNKNOWN WHO, IN CONNECTION WITH BOYCOTT, DIVESTMENT, AND SANCTIONS PROTESTS ON THE LAND (DEFINED IN SCHEDULE 1) 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**

**Defendants**

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**INTERIM INJUNCTION**

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**PENAL NOTICE**

**THIS IS AN ORDER OF THE COURT. IF YOU, THE WITHIN NAMED DEFENDANTS AND PERSONS UNKNOWN OR ANY OF YOU, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER, YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.**

**ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED**

**IMPORTANT NOTICE TO THE DEFENDANTS**

**This Order prohibits you from doing the acts set out in this Order. You should read it very carefully. You are advised to consult a solicitor as soon as possible. You have the right to ask the Court to vary or discharge this Order.**

**UPON** hearing Mr Lees KC and Miss Briggs, both of counsel, for the Claimant, the First, Second, and Third Defendants in person, and the Fourth, Fifth, and Sixth Defendants neither attending nor being represented.

**AND UPON** the Court reading the witness statement of Mr Alistair Jarvis dated 11 October 2024 and the first, second, and third witness statements of Mr Connor Merrifield dated 22 October 2024, 28 October 2024, and 28 October 2024 respectively, together with the exhibits thereto.

**AND UPON** the Court being satisfied that there is a sufficiently real and imminent risk of the Defendants committing the tort of trespass to justify the grant of a precautionary injunction.

**AND UPON** the following terms having the following meanings in this Order:

- (1) “the Land” meaning the parcels of land forming part of Title Numbers 325806, NGL376460, LN91321, LN94166, and LN179751 and as more particularly described in Schedule 1 hereto (by reference to the plan at enclosure 1);

- (2) “the **FOS Code**” meaning ~~Ordinance 24 promulgated by the Claimant titled ‘Code of Practice on Meetings or Other Activities on University Premises’ and dated 15 February 2019, together with Annexes 1 and 2 thereto~~ the code titled ‘**Freedom of Speech & Academic Freedom Code of Practice**’, together with Appendix A thereto, a copy of which is appended hereto at enclosure 2;
- (3) “the Appointed Officer” meaning ~~either Alistair Jarvis, Rita Akushie, or Emma Rees (or a person who, at the relevant time, holds the position of the Claimant’s Pro Vice-Chancellor (Partnerships and Governance), Pro Vice-Chancellor (Finance and Operations), or Executive Director, Property and Estates);~~
- (4) “the Visitor Regulations” meaning the regulations promulgated by the Claimant dated 8 February 2019 **and updated on 29 July 2025**, an **updated** copy of which is appended hereto at enclosure 3; and
- (5) “the Website” meaning <https://www.london.ac.uk/about/policies/core-policies/protest-code-practice-regulations>;
- (6) “the Alternative Service Application” meaning the Claimant’s application dated 14 October 2024 for alternative service pursuant to CPR 6.15 and 6.27; and
- (7) “the Alternative Service Order” meaning the Order of Adam Johnson J dated 16 October 2024 in relation to the Alternative Service Application.

**AND UPON** the Court accepting the Claimant’s undertaking that the Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

**AND UPON** the Court accepting the Claimant’s undertaking to publish the **FOS Code** and Visitor Regulations on the Website, ~~and to keep the Website updated with any changes to the identities of the Appointed Officers.~~

**AND UPON** the Court accepting the Claimant’s undertaking, upon the provision of written confirmation from ~~one of the Appointed Officers~~ **the Claimant’s Executive Director: Estates & Property Services (or equivalent)** that permission has been granted for a planned protest in connection with boycott, divestment, and sanctions protests on the Land by the ‘SOAS Liberated Zone for Gaza’ and/or ‘Democratise Education’ movements, to publish that written consent on the Website.

## IT IS ORDERED THAT:

1. With immediate effect until final disposal of the claim or further order (or, if earlier, 30 October 2025), the Defendants, and each of them, are forbidden from undertaking or engaging in any or all of the following activities:

a. Entering onto any part of the Land for the purpose of collective or public protest without first complying with the terms of the **FOS** Code and the Visitor Regulations, specifically:

- i. ~~by notifying one of the Appointed Officers immediately if they consider that the Code applies to the planned protest and, thereafter, complying with the procedure laid down therein~~ **submitting a completed request form (in the form appended to the FOS Code at Appendix A and titled ‘Request to Protest/Demonstrate on University of London Property’) via email to [uolevents@london.ac.uk](mailto:uolevents@london.ac.uk) and, thereafter, complying with the procedure laid down in Appendix A to the FOS Code, and**
- ii. by notifying the Claimant’s ~~Head of~~ Hospitality and Conferencing Services at least 72 hours in advance of the planned demonstration in accordance with Regulation 15.2, and
- iii. by complying with any conditions imposed on any such demonstration by the Claimant pursuant to Regulation ~~15.3~~ **15.2**, and
- iv. only upon receipt of written confirmation from ~~one of the Appointed Officers~~ **the Claimant’s Executive Director: Estates & Property Services (or equivalent)** that permission for the protest is granted;

for the avoidance of doubt, this sub-paragraph shall not preclude any Defendant from wearing a pin badge or item(s) of clothing which bears a slogan(s) and/or symbol(s) and/or which otherwise endorses or supports boycott, divestment, and sanctions protests by the ‘SOAS Liberated Zone for Gaza’ and/or the ‘Democratise Education’ movements,

- b. Obstructing or otherwise interfering with access to or from the Land,
- c. Erecting any tent or other structure, whether permanent or temporary, on any part of the Land,
- d. Causing, assisting or encouraging any other person to do any act prohibited by sub-paragraphs (a) to (c) above, and



- e. Continuing any act prohibited by sub-paragraphs (a) to (c) above.
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- 2. The Defendants or any other person affected by this Order may apply to the Court at any time to vary or discharge it, but, if they wish to do so, they must inform the Claimant's solicitors immediately (and in any event not less than 48 hours, excluding weekends and bank holidays, before the hearing of any such application).
  - 3. Any person applying to vary or discharge this Order must provide their full name and an address for service in the United Kingdom.
  - 4. Any person who applies to vary or discharge this Order shall file a skeleton argument and any evidence to be relied upon no later than 48 hours, excluding weekends and bank holidays, before the application hearing.
  - 5. The Claimant has permission to apply to extend or vary this Order or for further directions. The Claimant must give the Defendants at least 48 hours' notice, excluding weekends and bank holidays, of any such application.
  - 6. Pursuant to CPR r.6.15 and r.6.27, the Claimant shall serve this Order on the Defendants by:-
    - a. Leaving copies of the Order at the following locations upon the Land in transparent plastic boxes and/or plastic wallets as appropriate marked for the attention of "Persons Unknown in connection with boycott, divestment, and sanctions protests on the Land by the 'SOAS Liberated Zone for Gaza' and/or 'Democratise Education' movements":-
      - i. That part of Byng Place, London occupied by the Defendants the approximate location of which is marked in red and as location "A" on the plan at Enclosure 4 hereto (the "**Alternative Service Plan**") and which is present the site of the Defendants' protest encampment;
      - ii. The gates on Malet Street, London (the "**Malet Street Gates**"), which give access and egress to that part of the Claimant's land known as Torrington Square, the approximate location of which are marked in red and as location "B" on the Alternative Service Plan; and

- iii. The gates on Thornhaugh Street, London (the “**Thornhaugh Street Gates**”), which give access and egress to that part of the Claimant’s land known as Torrington Square, the approximate location of which are marked in red and as location “C” on the Alternative Service Plan.
- b. Positioning a warning notice advertising the existence of the Order upon, at, or nearby to the Malet Street Gates and the Thornhaugh Street Gates, which states that an interim injunction affecting “Persons Unknown in connection with boycott, divestment, and sanctions protests on the Land by the ‘SOAS Liberated Zone for Gaza’ and/or ‘Democratise Education’ movements” is in place and contains a QR code and/or link to the Website;
- c. Uploading a sealed copy of the Order to the Website; and
- d. Sending a link to the Website by email to:
  - i. [abel.harvieclark@gmail.com](mailto:abel.harvieclark@gmail.com) (Abel Harvie-Clark);
  - ii. [taranikitamann@gmail.com](mailto:taranikitamann@gmail.com) (Tara Mann);
  - iii. [Adamhaya78@gmail.com](mailto:Adamhaya78@gmail.com) (Haya Adam)
  - iv. [soasliberatedzone4gaza@proton.me](mailto:soasliberatedzone4gaza@proton.me) (general encampment e-mail address)].

7. Paragraphs 4 and 6 of the Alternative Service Order shall be varied as follows:

- a. The Defendants have permission to file and serve a Defence by 4pm on 11 December 2024.

8. This matter shall be listed for an in-person case management conference on the first open date after 18 December 2024, with a time estimate of half a day.

9. Costs reserved.

NAME AND ADDRESS OF CLAIMANT’S SOLICITORS

The Claimant's Solicitors are: Pinsent Masons LLP, 55 Colmore Row, Birmingham, B3 2FG.

Service of the Order:

The Court has provided a sealed copy of this Order to the serving party’s solicitors:-

Pinsent Masons LLP

55 Colmore Row

Birmingham

B3 2FG

Reference: AF02/630232.07557/CM80

Email: [connor.merrifield@pinsentmasons.com](mailto:connor.merrifield@pinsentmasons.com)

Email: [alicia.foo@pinsentmasons.com](mailto:alicia.foo@pinsentmasons.com)

## **SCHEDULE 1 – THE LAND**

The land shown edged red on the plan at enclosure 1 (the “**Plan**”), which comprises the following parcels of land:

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

## **ENCLOSURE 1 – PLAN**

[To be inserted]

## **ENCLOSURE 2 – THE CODE**

[To be inserted]

### **ENCLOSURE 3 – VISITOR REGULATIONS**

[To be inserted]

## **ENCLOSURE 4 – THE ALTERNATIVE SERVICE PLAN**

[To be inserted]