

Witness: Connor Merrifield  
Filed on behalf of the Claimant  
Number of witness statement: First  
Date: 30 July 2025  
Exhibits: CM1-CM4

IN THE HIGH COURT OF JUSTICE  
BUSINESS AND PROPERTY COURTS  
OF ENGLAND AND WALES (ChD)  
PROPERTY, TRUSTS AND PROBATE LIST  
B E T W E E N:-

Claim No. PT-2024-000893

THE UNIVERSITY OF LONDON

Claimant

-and-

- (1) ABEL HARVIE-CLARK  
(2) TARA MANN  
(3) HAYA ADAM
- (4) PERSONS UNKNOWN WHO, IN CONNECTION WITH BOYCOTT, DIVESTMENT, AND SANCTIONS PROTESTS BY THE 'SOAS LIBERATED ZONE FOR GAZA' AND/OR 'DEMOCRATISE EDUCATION' MOVEMENTS, ENTER OR REMAIN WITHOUT THE CONSENT OF THE CLAIMANT UPON ANY PART OF THE LAND (DEFINED IN SCHEDULE 1)
- (5) PERSONS UNKNOWN WHO, IN CONNECTION WITH BOYCOTT, DIVESTMENT, AND SANCTIONS PROTESTS BY THE 'SOAS LIBERATED ZONE FOR GAZA' AND/OR 'DEMOCRATISE EDUCATION' MOVEMENTS, OBSTRUCT OR OTHERWISE INTERFERE WITH ACCESS TO AND FROM ANY PART OF THE LAND (DEFINED IN SCHEDULE 1)
- (6) PERSONS UNKNOWN WHO, IN CONNECTION WITH BOYCOTT, DIVESTMENT, AND SANCTIONS PROTESTS BY THE 'SOAS LIBERATED ZONE FOR GAZA' AND/OR 'DEMOCRATISE EDUCATION' MOVEMENTS, ERECT ANY TENT OR OTHER STRUCTURE, WHETHER PERMANENT OR TEMPORARY, ON ANY PART OF THE LAND (DEFINED IN SCHEDULE 1)

Defendants

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EXHIBIT "CM1" TO THE  
WITNESS STATEMENT OF CONNOR MERRIFIELD

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Witness: Connor Merrifield  
Filed on behalf of the Claimant  
Number of witness statement: First  
Date: 30 July 2025  
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BUSINESS AND PROPERTY COURTS  
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Defendants

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EXHIBIT "CM2" TO THE  
WITNESS STATEMENT OF CONNOR MERRIFIELD

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## Connor Merrifield

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**Subject:** THE UNIVERSITY OF LONDON -V- (1) ABEL HARVIE-CLARK & OTHERS WITH CLAIM NO: PT-2024-000893; RE: APPLICATION

---

**From:** Connor Merrifield

**Sent:** 30 July 2025 17:35

**To:** 'Abel.harvieclark' <abel.harvieclark@gmail.com>; 'taranikitamann@gmail.com' <taranikitamann@gmail.com>; 'adamhaya78@gmail.com' <adamhaya78@gmail.com>

**Cc:** Craig Downhill <Craig.Downhill@pinsentmasons.com>; Alicia Foo <Alicia.Foo@pinsentmasons.com>

**Subject:** RE: THE UNIVERSITY OF LONDON -V- (1) ABEL HARVIE-CLARK & OTHERS WITH CLAIM NO: PT-2024-000893; RE: APPLICATION

Dear Abel, Tara, and Haya,

**CLAIM: THE UNIVERSITY OF LONDON -V- ABEL HARVIE CLARK & OTHERS WITH CLAIM NUMBER: PT-2024-000893 (THE "CLAIM")**


**RE: APPLICATION TO AMEND PARTICULARS OF CLAIM AND INTERIM INJUNCTION**


Further to my e-mail below, I now confirm that the University's application and supporting documents have been uploaded to: [Protests: record of legal papers served by University of London | University of London](#) in accordance with an Order for Alternative Service sealed on 16 October 2024, as supplemented by a consent order sealed by Master Pester on 13 December 2024.

Yours sincerely,

Connor

**Connor Merrifield** (He/Him/His)  
**Associate**

 +441133686523

 +447919366114



For Pinsent Masons LLP

**PA(s) :**

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## Connor Merrifield

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**Subject:** THE UNIVERSITY OF LONDON -V- (1) ABEL HARVIE-CLARK & OTHERS WITH CLAIM NO: PT-2024-000893; SERVICE OF APPLICATION

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**From:** Connor Merrifield

**Sent:** 30 July 2025 17:35

**To:** soasliberatedzone4gaza@proton.me

**Cc:** Craig Downhill <Craig.Downhill@pinsentmasons.com>; Alicia Foo <Alicia.Foo@pinsentmasons.com>

**Subject:** RE: THE UNIVERSITY OF LONDON -V- (1) ABEL HARVIE-CLARK & OTHERS WITH CLAIM NO: PT-2024-000893; SERVICE OF APPLICATION

Dear 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,

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Defendants

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EXHIBIT "CM3 TO THE  
WITNESS STATEMENT OF CONNOR MERRIFIELD

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## Connor Merrifield

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**Subject:** FW: UNIVERSITY OF LONDON -V- ABEL HARVIE-CLARK AND OTHERS; RE: URGENT APPLICATION

**Importance:** High

---

**From:** Connor Merrifield

**Sent:** 30 July 2025 15:38

**To:** Jude Lanchin <Jude.Lanchin@bindmans.com>

**Cc:** Alicia Foo <Alicia.Foo@pinsentmasons.com>; Craig Downhill <Craig.Downhill@pinsentmasons.com>

**Subject:** RE: UNIVERSITY OF LONDON -V- ABEL HARVIE-CLARK AND OTHERS; RE: URGENT APPLICATION

**Importance:** High

Dear Jude,

Further to my prior e-mail, I further attach a sealed copy of the University's application notice.

Yours sincerely,

Connor

**Connor Merrifield** (He/Him/His)  
**Associate**

☎ +441133686523

📱 +447919366114



For Pinsent Masons LLP

**PA(s) :**

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---

**From:** Connor Merrifield

**Sent:** 30 July 2025 15:29

**To:** Jude Lanchin <[Jude.Lanchin@bindmans.com](mailto:Jude.Lanchin@bindmans.com)>

**Cc:** Alicia Foo <[Alicia.Foo@pinsentmasons.com](mailto:Alicia.Foo@pinsentmasons.com)>; Craig Downhill <[Craig.Downhill@pinsentmasons.com](mailto:Craig.Downhill@pinsentmasons.com)>

**Subject:** UNIVERSITY OF LONDON -V- ABEL HARVIE-CLARK AND OTHERS; RE: URGENT APPLICATION

**Importance:** High

Hi Jude,

**CLAIM: THE UNIVERSITY OF LONDON -V- ABEL HARVIE CLARK & OTHERS WITH CLAIM NUMBER: PT-2024-000893 (THE "CLAIM")**

**RE: APPLICATION TO AMEND PARTICULARS OF CLAIM AND INTERIM INJUNCTION**

As you will be aware, on 1 August 2025 Part A1 of the Higher Education and Research Act 2017 (the "**Act**") is due to come into force – which will require my client, the University of London (the "**University**"), to take certain steps to secure freedom of speech. This will be done via, *inter alia*, the maintenance of a code of practice which sets out



matters relating to the University's values relating to freedom of speech as well as the procedures to be followed by relevant persons in connection with meetings and activities held on the University's land.

In order to ensure that the University is compliant with the Act, the University is due to introduce a new code – the **"FOS Code"** – which will replace the University's previous code of practice on meetings and other activities held on university premises dated 15 February 2019 (the **"Old Code"**).

The pleadings in the Claim, and the interim injunction order granted 30 November 2024 (amended on 13 November 2024), refer to the Old Code. In order to ensure the efficacy of the interim injunction, and the Claim generally, it is necessary for the University to amend its particulars of claim and the interim injunction to refer to the FOS Code.


We therefore attach the University's application to amend its particulars of claim and the interim injunction order alongside supporting evidence. Our client is endeavouring to serve the attached documents in accordance with the order for alternative service dated 13 December 2024 today – and **you will note that the University has requested an urgent hearing to be listed tomorrow** – in light of the imminency of the Act coming into force.


We would be grateful if you would take instructions as to whether the application can be agreed – noting that the application pertains to the introduction of the FOS Code – which will be beneficial to your clients by putting into place, amongst other things, the procedures to be followed by relevant persons in connection with meetings and activities held on the University's land.

Yours sincerely,

Connor

**Connor Merrifield** (He/Him/His)  
**Associate**

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For Pinsent Masons LLP

**PA(s) :**

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## Connor Merrifield

---

**Subject:** THE UNIVERSITY OF LONDON -V- (1) ABEL HARVIE-CLARK & OTHERS WITH CLAIM NO: PT-2024-000893; SERVICE OF CONSENT ORDERS [PM-AC.FID6385712]

**Importance:** High

---

**From:** Connor Merrifield

**Sent:** 30 July 2025 15:56

**To:** Abel.harvieclark <abel.harvieclark@gmail.com>; taranikitamann@gmail.com; adamhaya78@gmail.com

**Cc:** Craig Downhill <Craig.Downhill@pinsentmasons.com>; Alicia Foo <Alicia.Foo@pinsentmasons.com>

**Subject:** RE: THE UNIVERSITY OF LONDON -V- (1) ABEL HARVIE-CLARK & OTHERS WITH CLAIM NO: PT-2024-000893; SERVICE OF CONSENT ORDERS [PM-AC.FID6385712]

**Importance:** High

Dear Abel, Tara, and Haya,

**CLAIM: THE UNIVERSITY OF LONDON -V- ABEL HARVIE CLARK & OTHERS WITH CLAIM NUMBER: PT-2024-000893 (THE "CLAIM")**

**RE: APPLICATION TO AMEND PARTICULARS OF CLAIM AND INTERIM INJUNCTION**

On 1 August 2025 Part A1 of the Higher Education and Research Act 2017 (the "**Act**") is due to come into force – which will require my client, the University of London (the "**University**"), to take certain steps to secure freedom of speech. This will be done via, *inter alia*, the maintenance of a code of practice which sets out matters relating to the University's values relating to freedom of speech as well as the procedures to be followed by relevant persons in connection with meetings and activities held on the University's land.

In order to ensure that the University is compliant with the Act, the University is due to introduce a new code – the "**FOS Code**" – which will replace the University's previous code of practice on meetings and other activities held on university premises dated 15 February 2019 (the "**Old Code**").

The pleadings in the Claim, and the interim injunction order granted 30 November 2024 (amended on 13 November 2024), refer to the Old Code. In order to ensure the efficacy of the interim injunction, and the Claim generally, it is necessary for the University to amend its particulars of claim and the interim injunction to refer to the FOS Code.

We therefore attach the University's application to amend its particulars of claim and the interim injunction order alongside supporting evidence. Our client is endeavouring to serve the attached documents in accordance with the order for alternative service dated 13 December 2024 today – and **you will note that the University has requested an urgent hearing to be listed tomorrow** – in light of the imminency of the Act coming into force.

We would be grateful if you would confirm whether the application can be agreed or give instructions to your solicitors to that effect to whom we have also sent a copy of our client's application and its supporting documents – noting that the application pertains to the introduction of the FOS Code – which will be beneficial to you by putting into place, amongst other things, the procedures to be followed by relevant persons in connection with meetings and activities held on the University's land.

Yours sincerely,

Connor

**Connor Merrifield** (He/Him/His)  
**Associate**

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For Pinsent Masons LLP

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## Connor Merrifield

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**Subject:** THE UNIVERSITY OF LONDON -V- (1) ABEL HARVIE-CLARK & OTHERS WITH CLAIM NO: PT-2024-000893; SERVICE OF APPLICATION

**Importance:** High

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**From:** Connor Merrifield

**Sent:** 30 July 2025 15:58

**To:** soasliberatedzone4gaza@proton.me

**Cc:** Craig Downhill <Craig.Downhill@pinsentmasons.com>; Alicia Foo <Alicia.Foo@pinsentmasons.com>

**Subject:** THE UNIVERSITY OF LONDON -V- (1) ABEL HARVIE-CLARK & OTHERS WITH CLAIM NO: PT-2024-000893; SERVICE OF APPLICATION

**Importance:** High

Dear 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,

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We would be grateful if you would confirm whether the application can be agreed– noting that the application pertains to the introduction of the FOS Code – which will be beneficial to you by putting into place, amongst other things, the procedures to be followed by relevant persons in connection with meetings and activities held on the University's land.

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Connor

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For Pinsent Masons LLP

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B E T W E E N:-

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Claimant

-and-

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(8) TARA MANN

(9) HAYA ADAM

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Defendants

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EXHIBIT "CM4" TO THE  
WITNESS STATEMENT OF CONNOR MERRIFIELD

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## Connor Merrifield

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**Subject:** Hearing Thursday 31 July 2025, 10.30am, Rolls Building UNIVERSITY OF LONDON - V- ABEL HARVIE-CLARK AND OTHERS; RE: URGENT APPLICATION

**Importance:** High

---

**From:** Craig Downhill <Craig.Downhill@pinsentmasons.com>

**Sent:** 30 July 2025 18:05

**To:** Jude Lanchin <jude.lanchin@bindmans.com>

**Cc:** Alicia Foo <Alicia.Foo@pinsentmasons.com>; Connor Merrifield <Connor.Merrifield@pinsentmasons.com>

**Subject:** Hearing Thursday 31 July 2025, 10.30am, Rolls Building UNIVERSITY OF LONDON -V- ABEL HARVIE-CLARK AND OTHERS; RE: URGENT APPLICATION

**Importance:** High

Dear Jude,

Further to Connor's emails in relation to the University's application, we have been advised to attend at **10.30am tomorrow, Thursday 31 July 2025**, at Court 10 in the Rolls Building in readiness for the hearing of the University's application.

If your clients wish to make representations to the Court regarding that application, you or they should attend the hearing tomorrow.

The Court's address is as follows:

Rolls Building  
Fetter Lane  
London  
EC4A 1NL

Yours sincerely,

**Craig Downhill**  
Senior Associate

☎ +441216255356

📱 +447776666593

For Pinsent Masons LLP

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## Connor Merrifield

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**Subject:** Hearing Thursday 31 July 2025, 10.30am, Rolls Building - THE UNIVERSITY OF LONDON -V- (1) ABEL HARVIE-CLARK & OTHERS WITH CLAIM NO: PT-2024-000893; RE: APPLICATION

**Importance:** High

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**From:** Craig Downhill <Craig.Downhill@pinsentmasons.com>  
**Sent:** 30 July 2025 18:12  
**To:** abel.harvieclark@gmail.com; taranikitamann@gmail.com; adamhaya78@gmail.com  
**Cc:** Alicia Foo <Alicia.Foo@pinsentmasons.com>; Connor Merrifield <Connor.Merrifield@pinsentmasons.com>  
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**Importance:** High

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**From:** Craig Downhill <Craig.Downhill@pinsentmasons.com>

**Sent:** 30 July 2025 18:16

**To:** soasliberatedzone4gaza@proton.me

**Cc:** Alicia Foo <Alicia.Foo@pinsentmasons.com>; Connor Merrifield <Connor.Merrifield@pinsentmasons.com>

**Subject:** Hearing Thursday 31 July 2025, 10.30am, Rolls Building - THE UNIVERSITY OF LONDON -V- (1) ABEL HARVIE-CLARK & OTHERS WITH CLAIM NO: PT-2024-000893; SERVICE OF APPLICATION

**Importance:** High

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**Craig Downhill**  
Senior Associate

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For Pinsent Masons LLP



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