

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

Claim No. PT-2024-000893

BUSINESS AND PROPERTY COURTS

OF ENGLAND AND WALES (ChD)

PROPERTY, TRUSTS AND PROBATE LIST

B E T W E E N:-

THE UNIVERSITY OF LONDON

Claimant

-and-

(1) ABEL HARVIE-CLARK

(2) TARA MANN

(3) HAYA ADAM

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

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

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

Defendants

WITNESS STATEMENT OF CONNOR MERRIFIELD

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I, Connor Merrifield, Solicitor of Pinsent Masons LLP of 55 Colmore Row Birmingham B3 2FG,

WILL SAY AS FOLLOWS:

1. I am authorised on behalf of the Claimant to make this statement in support of the Claimant's application to, *inter alia*, amend its Particulars of Claim (the "**Application**"). The Application consists of the following documents: -
 - a. Sealed Application Notice dated 30 July 2025;
 - b. Amended Particulars of Claim;
 - c. Witness Statement of Matthew Grigson dated 30 July 2025; and
 - d. A draft Order,together, the "**Application Documents**").
2. Pinsent Masons LLP are instructed by the Claimant in relation to the Claim. I, and my colleague Craig Downhill, have day-to-day conduct of the Claim on behalf of the Claimant alongside our supervising partner Alicia Foo.
3. Unless stated otherwise the facts and matters set out in this witness statement are within my knowledge and I believe them to be true. Where any facts or matters are not within my own knowledge, the source of information is identified and those facts and matters are true to the best of my knowledge.
4. I prepared this witness statement.
5. There is now produced and shown to me marked as **Exhibits "CM1" – "CM4"** a bundle of true copy documents to which I refer in the course of this witness statement.

SERVICE OF THE APPLICATION

6. The Application was filed and sealed by the Court on 30 July 2025.
7. Pursuant to an order for alternative service sealed on 16 October 2024, as supplemented by a consent order sealed by Master Pester on 13 December 2024 (the “**Alternative Service Order**”), I arranged for service of the Application Documents upon the Defendants on the 30 July 2025 as follows: -
- a. I instructed Paul Cottee of Tremark Associates, being a professional process server, to leave two separate transparent plastic boxes each containing two copies of the Application Documents marked for the attention of: (i) “the Occupiers”; and (ii) “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” at the following locations (and as more particularised by paragraph 1a. of the Alternative Service Order):-
 - i. That part of Byng Place, London, WC1E 7LE the approximate location of which is marked red and as location “A” on the plan appended to the order for alternative service;
 - ii. The gates on Malet Street, London, the approximate location of which is marked red and as location “B” on the plan appended to the order for alternative service;
and
 - iii. The gates on Thornhaugh Street, London, the approximate location of which is marked in red and as location “C” on the plan appended to the order for alternative service,together, the “**Service Locations**”.

- b. I understand from speaking to Mr Cottee that he left the 6 plastic boxes, including the Application Documents, at or around the Service Locations, between 16:30 and 17:00 hours on Wednesday 30 July 2025. Mr Cottee was accompanied by Oliver Owen, an employee of the Claimant, who took photographic evidence of the service of the Application Documents at the Service Locations. These photographs were sent to me by Natalie Freilich, an-house solicitor for the Claimant, by e-mail on 30 July 2025 (timed at 17:12). Copies of these photographs can be found at **Exhibit CM1**.
- c. The Claimant also uploaded copies of the Application Documents to the following website: [Protests: record of legal papers served by University of London | University of London](#) which went live at around 17:30 on Wednesday 30 July 2025.
- d. I further sent a link to the abovementioned website by e-mail to the following e-mail addresses at 17:35 on Wednesday 30 July 2025 (copies of which e-mails can be found at **Exhibit CM2**):-
- i. abel.harvieclark@gmail.com (Abel Harvie Clark);
 - ii. taranikitamann@gmail.com (Tara Mann);
 - iii. adamhaya78@gmail.com (Haya Adam); and
 - iv. soasliberatedzone4gaza@proton.me .
- e. I further sent copies of the Application Documents to the above e-mail addresses, as well as to Jude Lanchin of Bindmans LLP (solicitors for the first three Defendants) by e-mail to Jude.Lanchin@bindmans.com between 15:38-15:58 hours on Wednesday 30 July 2025. Copies of these e-mails can be found at **Exhibit CM3**.

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8. My colleague, Craig Downhill, further e-mailed the above e-mail addresses (including Jude Lanchin) to confirm that we had been advised by the Court to attend Court 10 in the Rolls Building at 10:30 hours on Thursday 31 July 2025 for the hearing of the Application. Copies of these e-mails can be found at **Exhibit CM4**.

STATEMENT OF TRUTH

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Name: Connor Merrifield

Date: 30 July 2025

Signature:

