

Witness: Connor Merrifield  
Filed on behalf of the Claimant  
Number of witness statement: First  
Date: 22 October 2024  
Exhibits: CM1 – CM14

**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)**

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**Defendants**

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**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 further support of the Claimant's claim for a final precautionary injunction and application for an interim precautionary injunction. It supplements the Claimant's previous evidence in this claim in the form of a witness statement by Alistair Jarvis dated 11 October 2024.
2. Pinsent Masons LLP are instructed by the Claimant in relation to the Claim. I have day-to-day conduct of the Claim on behalf of the Claimant alongside my colleague, Craig Jonathan Downhill.
3. The facts and matters set out in this witness statement are based upon matters set out in documents, photographs and videos I have seen, and from information provided me by the Claimant's officers and employees unless otherwise stated. The facts and matters set out in this statement are true to the best of my knowledge and belief.
4. I prepared this witness statement. Any defined terms used herein have the meaning given to them in the witness statement of Alistair Jarvis dated 11 October 2024 unless expressed otherwise.
5. The Claimant's application for an interim precautionary injunction has been listed for hearing before Mr Justice Adam Johnson on Tuesday 29 October 2024. This witness statement is principally intended to update the aforementioned witness statement of Mr Jarvis and to supplement the same by exhibiting videographic evidence of some of the events referred to therein.
6. There is now produced and shown to me marked as **Exhibits "CM1" – "CM14"** a bundle of true copy documents and videos taken from social media accounts associated with the Defendants to which I refer in the course of this witness statement; where the exhibits are videos they are within a USB Stick labelled "USB1" a copy of which is included with this witness statement: -

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EXHIBIT	DOCUMENT DESCRIPTION	DATE	PAGE NO. OF EXHIBITS
			(Where video evidence, the videos can be found within a USB Stick referred to as "USB1" due to their file size)
"CM1"	Video 1 of rally from Downing Street to the Site posted by Instagram account @soasliberatedzone	10 May 2024	Exhibit "CM1" on USB1
"CM2"	Video 2 of the rally from Downing Street to the Site posted by Instagram account @soasliberatedzone	10 May 2024	Exhibit "CM2" on USB1
"CM3"	Photograph of the rally from Downing Street to the Site posted by Instagram account @soasliberatedzone	10 May 2024	
"CM4"	TikTok video of the SLZG within the Senate House posted by @soas.liberatedzone	24 May 2024	Exhibit "CM4" on USB1
"CM5"	Video 1 of the protest within the Finance Office posted by Instagram account @soasliberatedzone	28 May 2024	Exhibit "CM5" on USB1
"CM6"	Video 2 of the protest within the Finance Office posted by Instagram account @soasliberatedzone	28 May 2024	Exhibit "CM6" on USB1

<b>"CM7"</b>	Video of violent escalation between the Defendants and Jewish students posted by Instagram account @soasliberatedzone	9 July 2024	Exhibit "CM7" on USB1
<b>"CM8"</b>	Video of protest on 27 September 2024 posted by Instagram account @democratise.education	2 October 2024	Exhibit "CM8" on USB1
<b>"CM9"</b>	Video of protest march posted by Instagram account @birkbeck4palestine	5 October 2024	Exhibit "CM9" on USB1
<b>"CM10"</b>	Collaborative post between Instagram accounts @soasliberatedzone and @birkbeck4palestine advertising a "week of action"	21 October 2024	
<b>"CM11"</b>	Collaborative post between Instagram accounts @soasliberatedzone and @birkbeck4palestine in relation to a statement on divestment	12 October 2024	
<b>"CM12"</b>	Collaborative post between Instagram accounts @soasliberatedzone and @birkbeck4palestine in relation to escalation	13 October 2024	
<b>"CM13"</b>	Video posted by Instagram account @soasliberatedzone in relation to their intention to continue	13 October 2024	Exhibit "CM13" on USB1
<b>"CM14"</b>	Post by @democratise.education Instagram page	16 October 2024	

advertising an  
emergency assembly

## **BACKGROUND**

7. As detailed in the Witness Statement of Alistair Jarvis dated 11 October 2024, the Defendants have undertaken, and continue to threaten, protests and demonstrations upon the Land until their objectives are met. The majority of the Defendants' stated objectives centre on the application of pressure to SOAS in order to encourage it to boycott, divest from, and sanction Israel and any Israeli entities with whom it has links. The protests are therefore part of the "boycott, divestment, sanctions" or "BDS" movement. The Defendants have also, as recently as this month, began protesting specifically against SOAS' disciplinary stance towards students involved in such protests.
8. I understand from discussions with Natalie Freilich, Head of Legal of the Claimant, that, up until 17 October 2024, the Defendants have been carrying out transient protests on the Land on a near-daily basis. This continuing and/or frequently recurring protest activity typically consists of the Defendants leaving their base, being the Third Encampment at Byng Place, and entering onto the Land to demonstrate there. The Defendants have not, at any time, sought the Claimant's consent or licence to carry out these protests. These protests are usually attended by circa. 10 persons and typically last between 30 minutes and three hours. The Defendants usually protest by gathering outside buildings on the Site (typically, the Defendants will congregate, and protest on, the Orange Land, which is adjacent to the North Block occupied by SOAS) and chanting the following slogans: -
  - i. Free Free Palestine;
  - ii. From the River to the Sea Palestine will be Free;

- iii. Fire Habib;
- iv. Habib is a Traitor;
- v. SOAS Genocide;
- vi. Complicity;
- vii. Divest now;
- viii. SOAS stop funding war crimes;
- ix. End the occupation SOAS should not be silent; and
- x. Shame on you.

9. In addition to these frequently recurring, smaller-scale protests which are taking place on the Land near-daily, the Defendants have also organised and/or participated in some larger, and significantly more disruptive, protests on the Land. On their social media accounts (namely, the @soasliberatedzone and @democratise.education Instagram accounts and the @soas.liberated.zo TikTok account), the Defendants have described these protests as, variously, *“mass protests”*, *“rallies”*, and *“assemblies”*.

10. The Defendants have published videos of some of these protests and have repeatedly called for others to join them. These “rallying cries” are of particular concern to the Claimant, given the potential reach of these videos. For example, the Instagram account @soasliberatedzone has over 10,000 followers, and the first TikTok video posted by @soas.liberated.zo has been viewed 23,200 times.

11. By way of example only:-

- a. On 10 May 2024, shortly after the Original Encampment was established, the Instagram account @soasliberatedzone published a “carousel” post, consisting of two videos (copies of which can be found at **Exhibit CM1**

and CM2 respectively) and a still photograph (which can be found at **Exhibit CM3**), of a “rally” or march from Downing Street to the site of the Original Encampment on the Land. The caption to that post reads:

*‘Over 700 people joined our rally all the way from Downing street to our encampment liberation zone! This marks the largest ever protest recorded in the history of this campus [...]*

*Keep your eyes on Rafah & Gaza and SHOW UP! We will keep making noise, causing disruption, camping, until our demands are met. DISCLOSE, DIVEST, WE WILL NOT STOP WE WILL NOT REST’.*

- b. On 24 May 2024, the Defendants broke into a meeting of SOAS’ board of trustees which was taking place in the Senate House. I refer to a video posted on TikTok by the SLZG on the same day which depicts the Defendants chanting with loudspeakers and refusing to leave – a copy of which can be found at **Exhibit CM4**. The Defendants can be seen confronting the Claimant’s security personnel. The sheer number of individuals participating in this protest, and the number of security personnel needed to try and manage the protest, can be seen from this video.
- c. Very shortly thereafter, on 28 May 2024, the Defendants broke into and occupied SOAS’ finance office. A speech by one of the Defendants, delivered while occupying the finance office, can be found at **Exhibit CM5**, and a further video of their protest in the finance office can be found at **Exhibit CM6**. In the latter video, the Defendants can be seen continuing to chant “*your profits are covered in Palestinian blood*” and state

that “*SOAS is complicit in genocide*”. They further evinced their intention to remain until their demands are met.

- d. As set out in Mr Jarvis’ witness statement dated 25 July 2024, on 4 June 2024, an altercation took place between a security guard and a number of the Defendants in which the security guard was assaulted by at least one of the Defendants.
- e. On 9 July 2024, there was a violent escalation between Jewish students and the Defendants at the Original Encampment which led to arrests and violence, with the Defendants profaning at, and belittling, police officers. I refer to **Exhibit CM7** which is a video posted by the @soasliberatedzone Instagram page on 9 July 2024.
- f. As set out in Mr Jarvis’ witness statement dated 11 October 2024, on 5 September 2024, the Defendants trespassed on the Orange Land in order to stage a disruptive protest during SOAS graduation ceremonies.
- g. More recently, on 27 September 2024, the Defendants undertook a large-scale protest to coincide with SOAS’ Freshers’ Fayre. I refer to **Exhibit CM8** which is a video posted by the @democratise.education Instagram page on 2 October 2024 and, to the best of my knowledge, records footage of the 27 September 2024 protest. This video shows between 60 and 70 people in attendance at the protest. Moreover, this video was posted with the caption “*Come to the assembly to get organised – 3<sup>rd</sup> October, 6pm – SOAS campus*”. The Defendants’ avowed intention is to undertake large-scale protests upon the Land and they have expressly, and on a continuing basis, threatened further escalation and demonstration.



- h. Further protests, including the “Democratise Education” protest on 3 October 2024, the “student bloc” protest on 5 October 2024, and a rally on 10 October 2024 are detailed at paragraphs 63 to 68 of Mr Jarvis’ witness statement dated 11 October 2024. I refer to **Exhibit CM9**, which is a video of the Instagram reel referred to by Mr Jarvis at paragraphs 66 and 67 of his statement.
12. When these significant protests occur, such as the protest on 27 September 2024, it has a substantial impact on the flow of pedestrian traffic in the area. The large gatherings often create congestion, making it difficult for people to navigate through the precinct safely and efficiently. The situation is further complicated when protesters congregate directly outside of the Claimant’s buildings (including those demised to other institutions, like SOAS), which can obstruct entryways and limit access for staff, tenants, and visitors. In view of the previous instances of violence, and the altercations which have taken place, the Claimant is concerned about the creation of potential “pinch points” at entrances and exits where there is an increased risk of confrontation.
13. These disruptions not only pose potential safety concerns, but also affect the normal functioning of businesses and services within the Claimant’s buildings.
14. Further, as explained below, the Claimant’s concerns have been heightened by the recent escalation in these larger-scale protests (as to which, see below). This escalation appears to have coincided with the start of the new academic year, a time when the Claimant’s campus is often at its busiest and footfall is particularly high. The Claimant is concerned that this would be the optimum time for the Defendants to seek to persuade others, whether new or returning

students (or, indeed, others who are sympathetic to their cause) to join them, The Defendants appear to be cognisant of this fact and, indeed, appear to be seeking to exploit the same:

- a. At paragraph 70.2 of his witness statement dated 11 October 2024, Mr Jarvis makes reference to an Instagram reel published by @soasliberatedzone in which the Third Defendant can be seen saying '*specifically we are ready for the new academic year*'.
- b. More recently, on 21 October 2024, the Instagram account @democratise.education published a collaborative post, published a collaborative post, co-authored with @soasliberatedzone, advertising the Defendants' "*week of action*". The caption to that post says as follows:

*"The democratise education campaign reaches a critical point. Over the summer, SOAS exploited the lack of presence on campus to take these extreme suppressive measures against student activists. We will not allow this institution to do so again. We will make our voices heard".*

I refer to **Exhibit CM10**, which includes screenshots of this post.

15. This escalation has also coincided with the emergence of the "Democratise Education" movement in or around October 2024.
16. In view of the above, the Claimant is concerned about an increase not only in the frequency of the Defendants' protest activities, but also the size and scale of those protest activities.

## **FURTHER THREAT OF ESCALATION SINCE 11 OCTOBER 2024**

17. By way of an update to the witness statement of Mr Jarvis dated 11 October 2024, the Instagram pages @soasliberatedzone and @democratise.education have continued to post further videos evincing the Defendants' intentions to continue their demonstrations and trespasses unabated.

18. I refer to **Exhibit CM11**, which is a collaborative Instagram post dated 12 October 2024 published by @soasliberatedzone and co-authored by @soasliberatedzone. This "carousel" post, which consists of slides with text, sets out SLZG's statement on an apparent divestment by SOAS. This states that:

*"Hence, it is naïve at best to believe that SOAS has or will meet our demands of their own will – the reality is that we must be the ones to force their hand. This is what the SOAS Liberated Zone for Gaza has been working to do and the increased attempts to repress our movement only show that our efforts are working.*

*[...]*

*[W]e chose revolutionary optimism – we will achieve every one of our demands in its entirety through the mass resistance of our SOAS community, not through closed door meetings designed to play into management's hands [...]'.*

19. The caption to this post states that *"student activism on campus will never die and will only grow"*.

20. I also refer to **Exhibit CM12**, which is another collaborative Instagram post dated 13 October 2024, albeit this time published by @democratise.education and co-authored by @soasliberatedzone. This provides:-

*"Students and staff must stand up and fight back! As they escalate their*

*repression, we must escalate our resistance.*

[...]

*They don't want an academic year of action and escalation by students, workers and communities. Whilst this divestment has material implications which we are proud of we know it is the bare minimum in the face of a genocide and we have far more to organise and win. (refer to the latest SOAS liberated zone statement for more information on this)*

[...]

*The concessions made by SOAS management and the huge efforts that they continue to make to silence students show us only that our movement is working. But our work is far from over. If we are to win BDS on campus, we must continue to organise and continue to disrupt [...]"*

21. In view of these posts, the Defendants publicly-stated intention is to undertake a year of action and escalation. The Defendants expressly acknowledge that their activities involve disruption; indeed, this disruption is intentional ("*we must continue to organise and continue to disrupt*"). The Claimant has no alternative but to take these threats at face value, as the disruption threatened will cause substantial interference with its day-to-day operations and have an adverse impact on the experience of its staff, students, and tenants, as well as other visiting members of the public.

22. Further, I refer to **Exhibit CM13** which is a video posted the same day. The video depicts tens of people chanting "*we will not stop we will not rest*" and includes a voiceover which provides "*we're here to say that we're here to stay*" and "*the encampment has been here for months and the student movement is growing and stronger than ever*". It is clearly the Defendants' explicit, publicly stated position that they will not stop and, indeed, that they intend to escalate their

demonstrations and protests on the Land going forwards until their demands are met.

23. On 16 October 2024, the @democratise.education Instagram page further posted an advert for an emergency assembly on 18 October 2024 – a copy of the post can be found at **Exhibit CM14**. In the post, the Defendants state:-

*“[...] We will plan together to escalate in the week beginning 21/10 in a week of action. Next week: As part of the week of action, Thursday will see a walkout and rally. Spread the word, bring your friends and see you there”*

24. The Defendants have since published further Instagram posts advertising this “week of action”, including the post dated 21 October 2024 which is referred to above. This post includes the itinerary for the week of action, including “rallies” and “walk outs” on 23 to 25 October 2024 (inclusive). It is noted that this post refers to a rally “in the JCR”. There is a concern that the Defendants may seek to gain access to buildings on the Site, which might mark a resumption of the sorts of highly disruptive protests which took place in May of this year.
25. The post also refers to a “banner drop” on 22 October 2024. It is not clear what is meant by this. However, previously, on 17 May 2024, a “leaflet drop” took place in the North Block, during which some or all of the Defendants obscured their faces and confronted staff whilst filming them (see paragraph 34.1 of Mr Jarvis’ statement dated 25 July 2024 in support of the Earlier Proceedings).
26. During the summer vacation, the Defendants’ trespassory protests upon the Land largely consisted of smaller-scale, albeit very frequently recurring, transient protests. However, the start of the new academic year, and the return

of many students to campus, has coincided with an escalation in the Defendants' protest activities. Throughout October, these larger-scale protests referred to above have been increasing in frequency. This appears to be a deliberate choice on the part of the Defendants: the Defendants' express and publicly-stated intention is to continue to "*escalate*" and "*disrupt*" until their demands are met. The Defendants appear to be determined to take advantage of the new academic year and encourage others to join their protests. Previously, the Defendants' protests have involved violence and other, very serious, anti-social behaviour. The Claimant is extremely concerned that any "*escalation*" may involve further instances of violence and/or anti-social behaviour.

27. In conclusion, the Defendants have continued to undertake large-scale trespassory protests upon the Land. In view of the increase in the frequency of these protests, and the Defendants' avowed intention to continue protesting and to "*escalate*" their efforts, there is a real, and imminent, threat of these trespasses continuing.

### **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.

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Date: 22 October 2024

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Signature:

A handwritten signature in black ink, appearing to read 'C. Merrifield'. The signature is written in a cursive style with a large, looping 'M' and a long, sweeping tail.

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**Defendants**

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**EXHIBIT “CM1” TO THE**

**WITNESS STATEMENT OF CONNOR MERRIFIELD**

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Exhibit “CM1” to the Witness Statement of Connor Merrifield can be found on “USB1”.



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**Defendants**

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**EXHIBIT “CM2” TO THE**

**WITNESS STATEMENT OF CONNOR MERRIFIELD**

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**EXHIBIT “CM3” TO THE**


**WITNESS STATEMENT OF CONNOR MERRIFIELD**


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 soasliberatedzone • Follow

 soasliberatedzone Edited • 23 w  
Over 700 people joined our rally all the way from Downing street to our encampment liberation zone! This marks the largest ever protest recorded in the history of this campus 🇵🇸

Keep your eyes on Rafah & Gaza and SHOW UP! We will keep making noise, causing disruption, camping, until our demands are met! DISCLOSE, DIVEST, WE WILL NOT STOP WE WILL NOT REST



 ashamed.to.be.human 23 w  
That awesome guy with the beard and red jacket ❤️ Seriously though, this is amazing - you should all be very proud. Change is near ps 🇵🇸 ❤️

♡ 💬 📌

1,049 likes  
10 May

Log in to like or comment.

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**EXHIBIT “CM4” TO THE**

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**Defendants**

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**EXHIBIT “CM5” TO THE**

**WITNESS STATEMENT OF CONNOR MERRIFIELD**

---

Exhibit “CM5” to the Witness Statement of Connor Merrifield can be found on “USB1”.

Witness: Connor Merrifield  
Filed on behalf of the Claimant  
Number of witness statement: First  
Date: 22 October 2024  
Exhibits: CM1 – CM14

**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)**

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**Defendants**

---

**EXHIBIT “CM6” TO THE**

**WITNESS STATEMENT OF CONNOR MERRIFIELD**

---

Exhibit “CM6” to the Witness Statement of Connor Merrifield can be found on “USB1”.

Witness: Connor Merrifield  
Filed on behalf of the Claimant  
Number of witness statement: First  
Date: 22 October 2024  
Exhibits: CM1 – CM14

**IN THE HIGH COURT OF JUSTICE**

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

**BUSINESS AND PROPERTY COURTS**

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**-and-**

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**Defendants**

---

**EXHIBIT “CM7” TO THE**

**WITNESS STATEMENT OF CONNOR MERRIFIELD**

---

Exhibit “CM7” to the Witness Statement of Connor Merrifield can be found on “USB1”.

Witness: Connor Merrifield  
Filed on behalf of the Claimant  
Number of witness statement: First  
Date: 22 October 2024  
Exhibits: CM1 – CM14

**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**

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**THE UNIVERSITY OF LONDON**

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**(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)**

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**Defendants**

---

**EXHIBIT “CM8” TO THE**

**WITNESS STATEMENT OF CONNOR MERRIFIELD**

---

Exhibit “CM8” to the Witness Statement of Connor Merrifield can be found on “USB1”.



Witness: Connor Merrifield  
Filed on behalf of the Claimant  
Number of witness statement: First  
Date: 22 October 2024  
Exhibits: CM1 – CM14

**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:-**

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**Claimant**

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**Defendants**

---

**EXHIBIT “CM9” TO THE**

**WITNESS STATEMENT OF CONNOR MERRIFIELD**

---

Exhibit “CM9” to the Witness Statement of Connor Merrifield can be found on “USB1”.

Witness: Connor Merrifield  
Filed on behalf of the Claimant  
Number of witness statement: First  
Date: 22 October 2024  
Exhibits: CM1 – CM14

**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**

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**Defendants**

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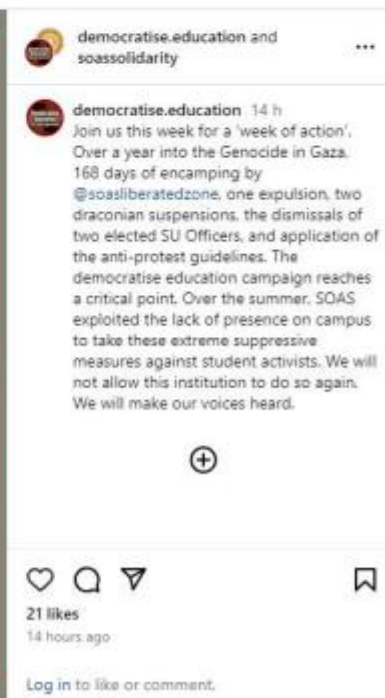
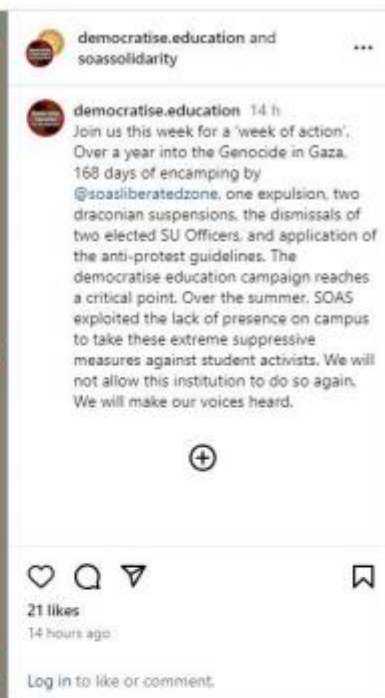
**EXHIBIT “CM10” TO THE**

**WITNESS STATEMENT OF CONNOR MERRIFIELD**

---

This is Exhibit “CM10” to the Witness Statement of Connor Merrifield.

Witness: Connor Merrifield  
Filed on behalf of the Claimant  
Number of witness statement: First  
Date: 22 October 2024  
Exhibits: CM1 – CM14



Witness: Connor Merrifield  
Filed on behalf of the Claimant  
Number of witness statement: First  
Date: 22 October 2024  
Exhibits: CM1 – CM14

**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  
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(3) HAYA ADAM  
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AND/OR ‘DEMOCRATISE EDUCATION’ MOVEMENTS, ENTER OR REMAIN  
WITHOUT THE CONSENT OF THE CLAIMANT UPON ANY PART OF THE LAND  
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AND/OR ‘DEMOCRATISE EDUCATION’ MOVEMENTS, OBSTRUCT OR  
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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**

---

**EXHIBIT “CM11” TO THE**

**WITNESS STATEMENT OF CONNOR MERRIFIELD**

---

This is Exhibit “CM11” to the Witness Statement of Connor Merrifield.

Witness: Connor Merrifield  
Filed on behalf of the Claimant  
Number of witness statement: First  
Date: 22 October 2024  
Exhibits: CM1 – CM14

soasliberatedzone and abel.su.dem.ed

soasliberatedzone 1 w  
SOAS STUDENTS MUST READ AND SHARE

This SOAS Liberated Zone statement sheds light on the context in which yesterday's news on investments arose. Whilst management believes that they can placate the student body with cheap diversion tactics, student activism on campus will never die and will only grow.

292 likes  
12 October

Log in to like or comment.

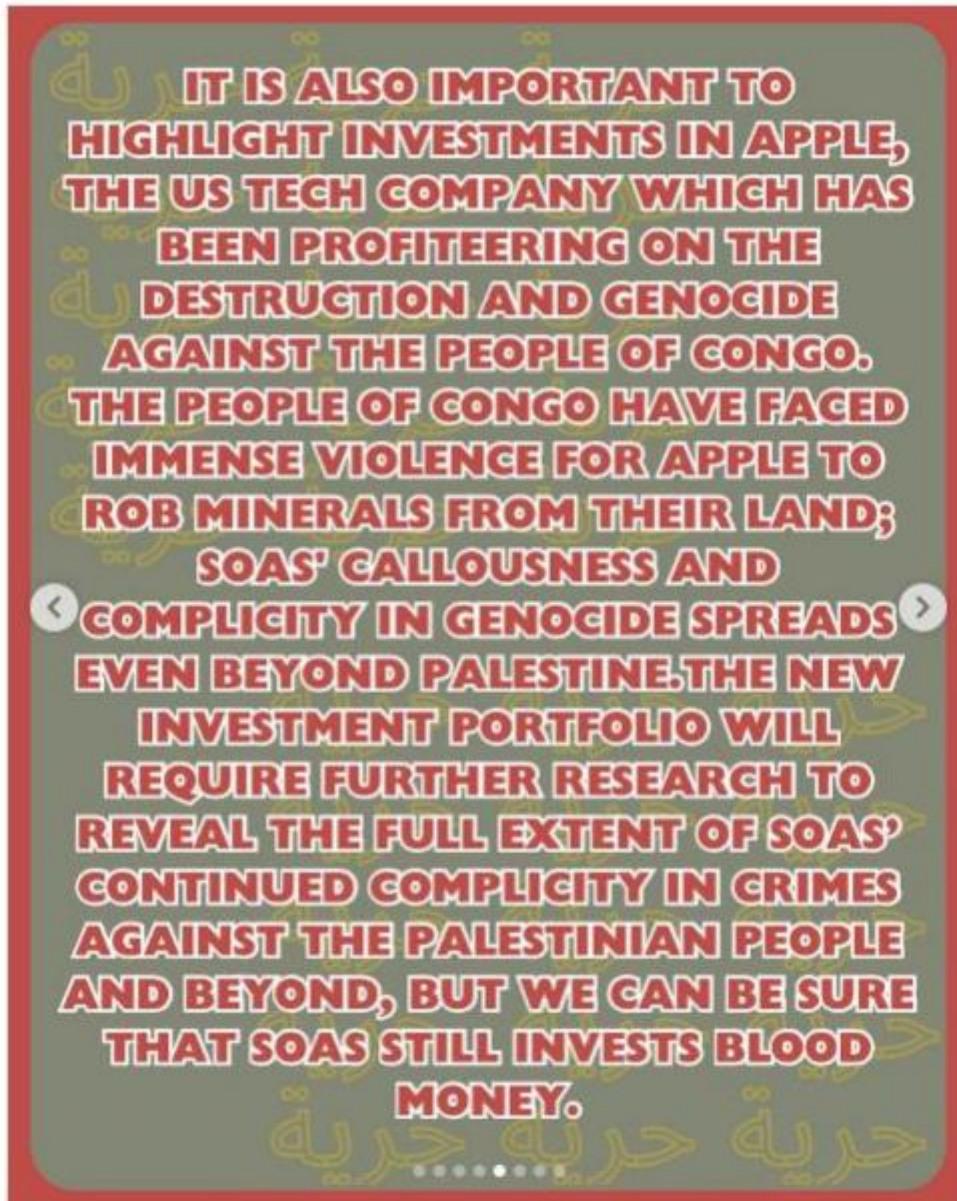
**SOAS HAS RELEASED ITS LATEST INVESTMENT PORTFOLIO (AS OF 30 SEPTEMBER 2024) AND IT SHOWS THAT THE UNIVERSITY'S HOLDINGS IN ALBEMARLE INC., A COMPANY THAT PRODUCED WHITE PHOSPHORUS WHICH HAS BEEN USED FOR IOF WAR CRIMES IN GAZA AND LEBANON, HAVE BEEN REMOVED. WHILE IT IS CERTAINLY A GOOD THING THAT OUR SO-CALLED 'EDUCATIONAL' INSTITUTION NO LONGER INVESTS IN SUCH A COMPANY THAT CONTRIBUTES TO CRIMES AGAINST HUMANITY, WE ARE FORCED TO WELCOME THIS NEWS WITH SCEPTICISM.**







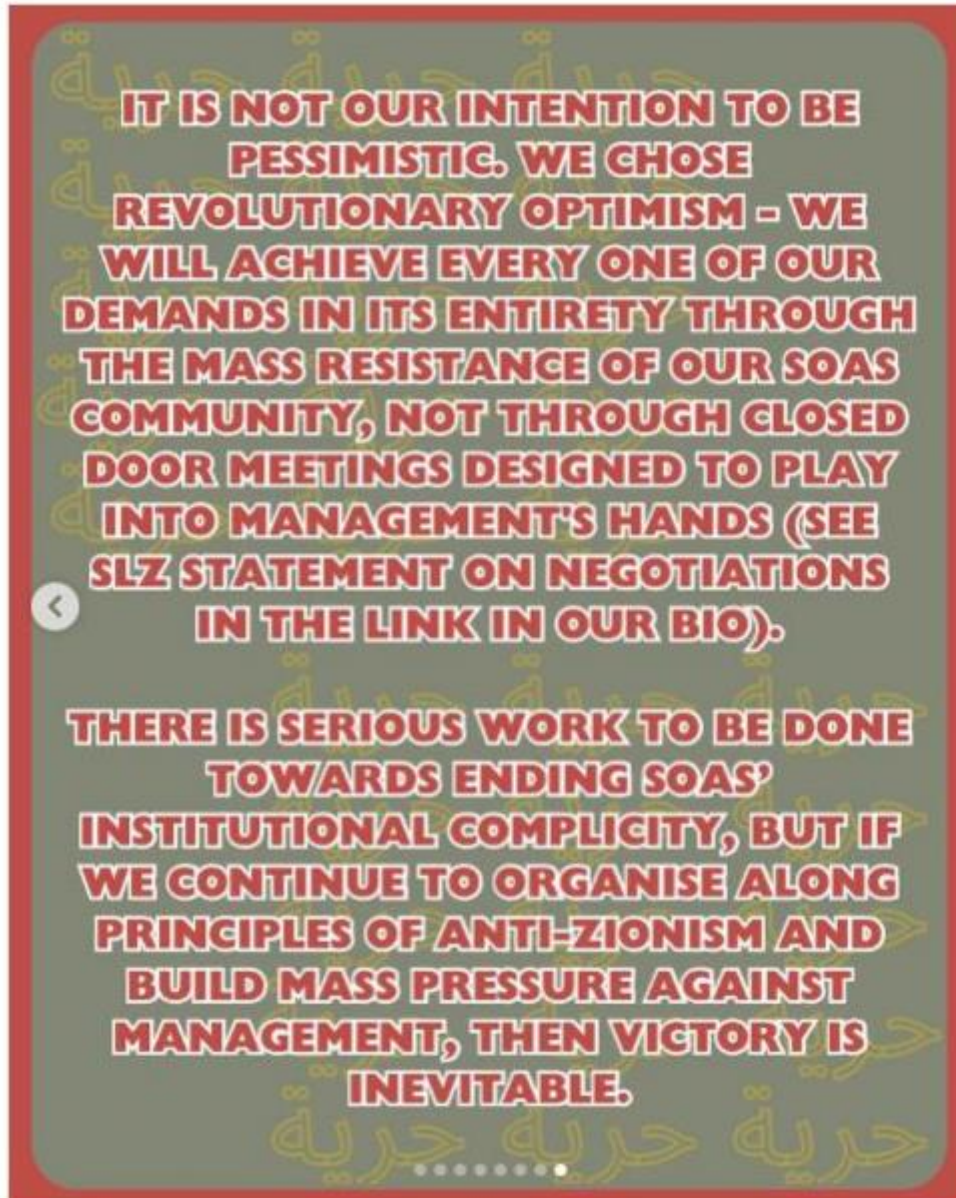












Witness: Connor Merrifield  
Filed on behalf of the Claimant  
Number of witness statement: First  
Date: 22 October 2024  
Exhibits: CM1 – CM14

**IN THE HIGH COURT OF JUSTICE**

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

**BUSINESS AND PROPERTY COURTS**

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**PROPERTY, TRUSTS AND PROBATE LIST**

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**Defendants**

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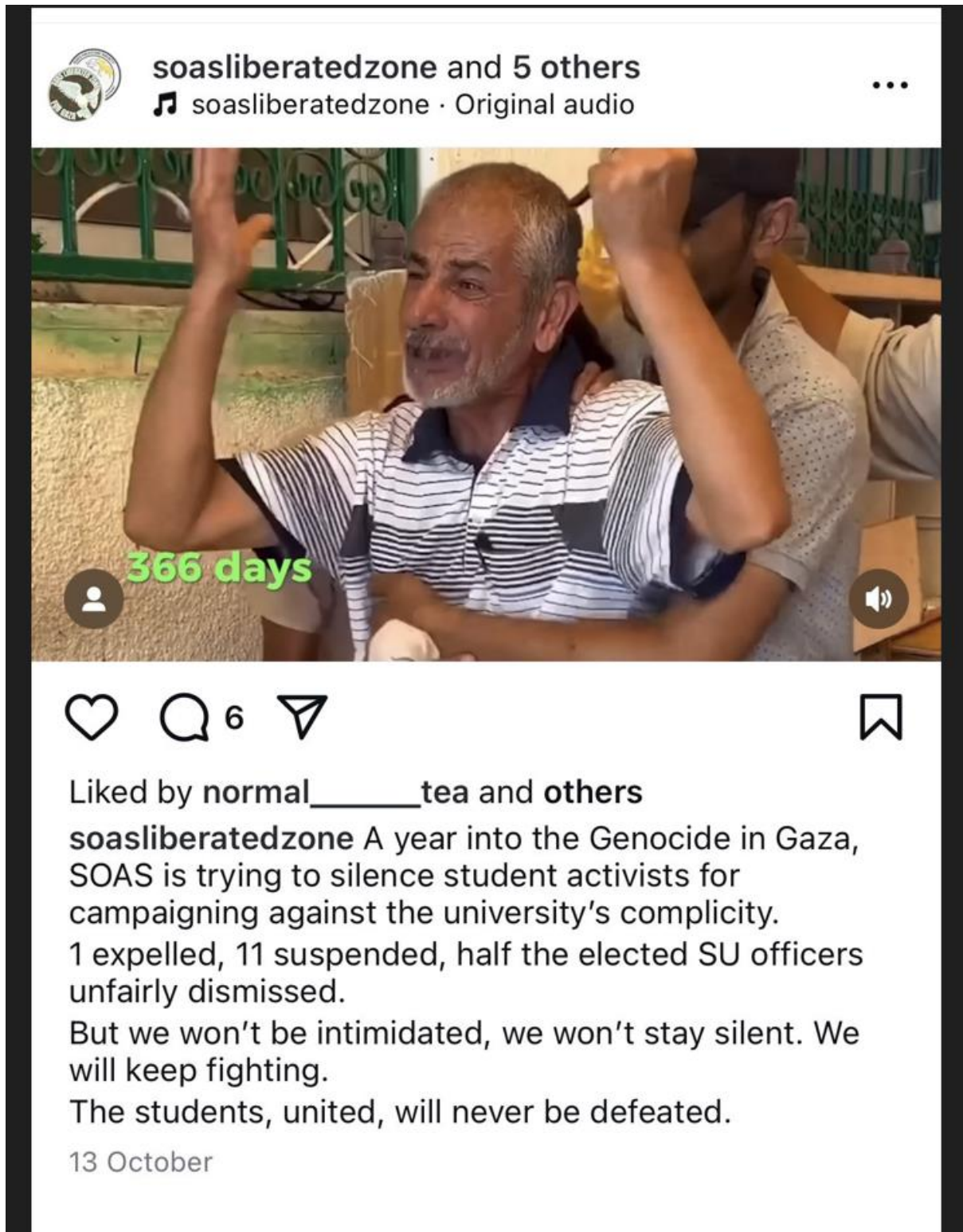
**EXHIBIT “CM12” TO THE**

**WITNESS STATEMENT OF CONNOR MERRIFIELD**

---

This is Exhibit “CM12” to the Witness Statement of Connor Merrifield.





Witness: Connor Merrifield  
Filed on behalf of the Claimant  
Number of witness statement: First  
Date: 22 October 2024  
Exhibits: CM1 – CM14

**IN THE HIGH COURT OF JUSTICE**

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

**BUSINESS AND PROPERTY COURTS**

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**Defendants**

---

**EXHIBIT “CM13” TO THE**

**WITNESS STATEMENT OF CONNOR MERRIFIELD**

---

Exhibit “CM13” to the Witness Statement of Connor Merrifield can be found on “USB1”.

Witness: Connor Merrifield  
Filed on behalf of the Claimant  
Number of witness statement: First  
Date: 22 October 2024  
Exhibits: CM1 – CM14

**IN THE HIGH COURT OF JUSTICE**

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

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**Defendants**

---

**EXHIBIT “CM14” TO THE**

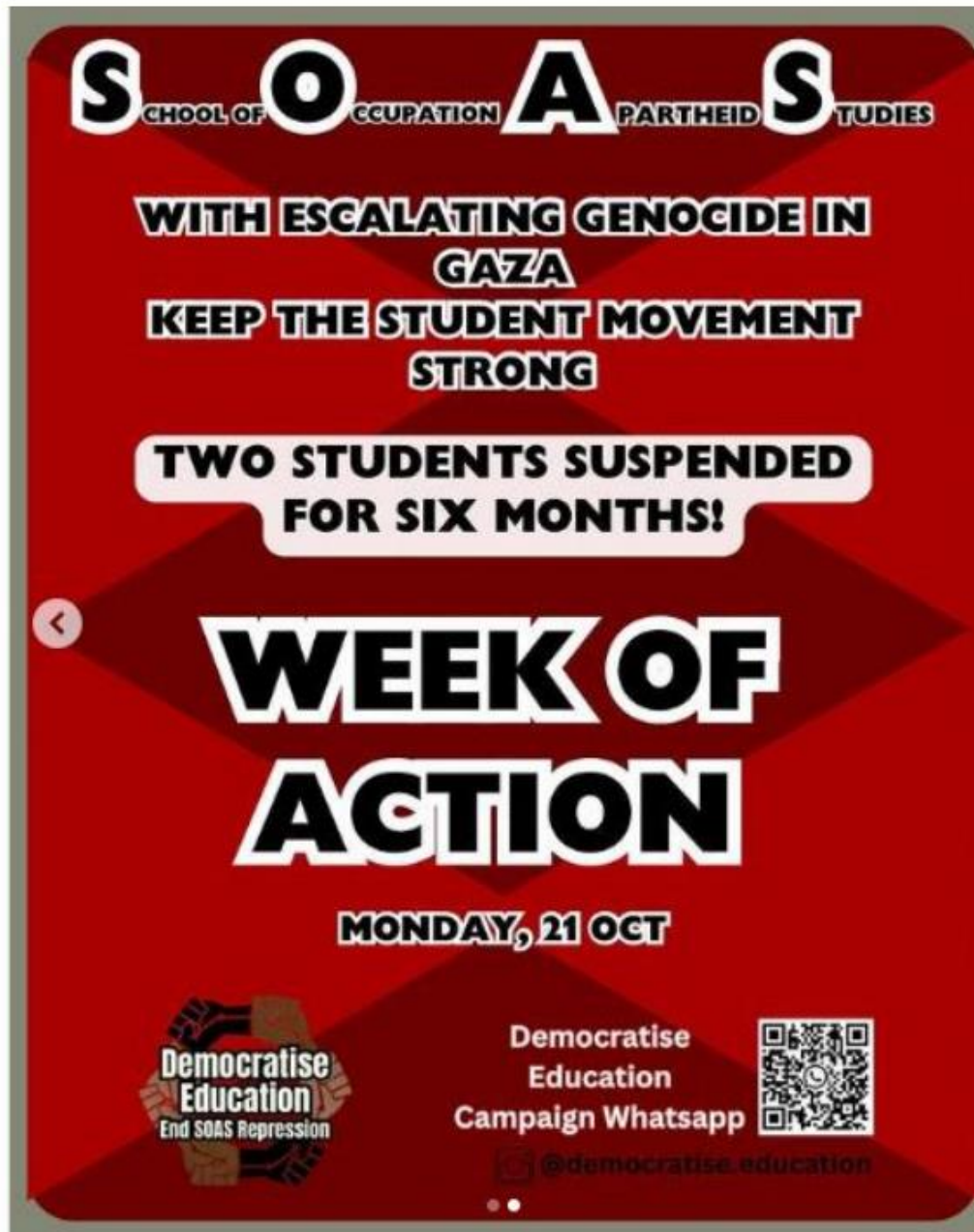
**WITNESS STATEMENT OF CONNOR MERRIFIELD**

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This is Exhibit “CM14” to the Witness Statement of Connor Merrifield.









democratise.education As the zionist project continues to impose atrocities on Gaza, Palestine, and the region, we must build and strengthen our movement. SOAS is trying to silence pro-Palestine voices on campus, but together we can resist the repression and defend Palestine solidarity at SOAS!

Join us for two important upcoming events:

Friday, 4pm: emergency assembly, responding to the latest draconian suspensions, as well as the ongoing SU dismissals, and the demands on SOAS to divest and break its ties with the zionist entity. We will plan together to escalate in the week beginning 21/10 in a week of action.

Join us for two important upcoming events:

Friday, 4pm: emergency assembly, responding to the latest draconian suspensions, as well as the ongoing SU dismissals, and the demands on SOAS to divest and break its ties with the zionist entity. We will plan together to escalate in the week beginning 21/10 in a week of action.

Next week: As part of the week of action, Thursday will see a walkout and rally. Spread the word, bring your friends and see you there!

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