

**Elwira Kelly  
Claimant  
Fifth Statement  
2 October 2026  
Exhibit "EK5"**

**IN THE HIGH COURT OF JUSTICE**

**CLAIM No. PT-2025-000910**

**BUSINESS AND PROPERTY DIVISION**

**BETWEEN**

**(1) MOOG WOLVERHAMPTON LIMITED**

**(2) MOOG FERNAU LIMITED**

**(3) MOOG READING LIMITED**

**(4) MOOG CONTROLS LIMITED**

**Claimants**

**- and -**

**(1) PERSONS UNKNOWN WHO FOR THE PURPOSE OF PROTEST OR SABOTAGE ENTER OCCUPY OR REMAIN ON, OR DAMAGE, THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 1 BEING MOOG AIRCRAFT GROUP WOLVERHAMPTON, VALIANT WAY, PENDEFORD, WOLVERHAMPTON WV9 5GB, OR WHO OBSTRUCT AND/OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT AND/OR INTERFERE WITH ACCESS TO OR EGRESS FROM THAT LAND AND PREMISES**

**(2) PERSONS UNKNOWN WHO FOR THE PURPOSE OF PROTEST OR SABOTAGE ENTER OCCUPY OR REMAIN ON, OR DAMAGE, THE LAND AND PREMISES SHOWN EDGED YELLOW ON PLAN 2 BEING MOOG CONTROLS LTD LUTON, UNITS C AND J AIRPORT EXECUTIVE PARK, PRESIDENT WAY, LUTON LU2 9NY, OR WHO OBSTRUCT AND/OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT AND/OR INTERFERE WITH ACCESS TO OR EGRESS FROM THAT LAND AND PREMISES**

**(3) PERSONS UNKNOWN WHO FOR THE PURPOSE OF PROTEST OR SABOTAGE ENTER OCCUPY OR REMAIN ON, OR DAMAGE, THE LAND AND PREMISES SHOWN EDGED YELLOW ON PLAN 3 BEING MOOG READING LIMITED, 30 SUTTONS BUSINESS PARK, READING, BERKSHIRE RG6 1AW, OR WHO OBSTRUCT AND/OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT AND/OR**

**INTERFERE WITH ACCESS TO OR EGRESS FROM THAT LAND  
AND PREMISES**

**(4) PERSONS UNKNOWN WHO FOR THE PURPOSE OF PROTEST OR  
SABOTAGE ENTER OCCUPY OR REMAIN ON, OR DAMAGE, THE  
LAND AND PREMISES SHOWN EDGED RED ON PLAN 4 BEING  
MOOG AIRCRAFT GROUP TEWKSBURY, ASHCHURCH,  
TEWKESBURY, GLOUCESTERSHIRE GL20 8NA, OR WHO  
OBSTRUCT AND/OR INTERFERE WITH OR ATTEMPT TO  
OBSTRUCT AND/OR INTERFERE WITH ACCESS TO OR EGRESS  
FROM THAT LAND AND PREMISES**

**(5) PERSONS UNKNOWN WHO FOR THE PURPOSE OF PROTEST OR  
SABOTAGE ENTER OCCUPY OR REMAIN ON, OR DAMAGE, THE  
LAND AND PREMISES SHOWN EDGED RED ON PLAN 5 BEING  
MOOG INDUSTRIAL GROUP, ASHCHURCH PARKWAY,  
TEWKESBURY, GLOUCESTERSHIRE GL20 8TU, OR WHO  
OBSTRUCT AND/OR INTERFERE WITH OR ATTEMPT TO  
OBSTRUCT AND/OR INTERFERE WITH ACCESS TO OR EGRESS  
FROM THAT LAND AND PREMISES**

**Defendants**

---

**FIFTH WITNESS STATEMENT OF ELWIRA KELLY**

---

**INTRODUCTION**

1. I am Senior Vice President, General Counsel, and Corporate Secretary at Moog, Inc (**"Moog"**). I am authorised to make this witness statement on behalf of the Claimants. I have previously given four witness statements in these proceedings, the first dated 4 September 2025 (**"Kelly 1"**), the second dated 5 September 2025 (**"Kelly 2"**), the third dated 1 October 2025 (**"Kelly 3"**), and the fourth dated 28 July 2026 (**"Kelly 4"**). For the avoidance of doubt, capitalised terms in this statement continue to adopt the definitions in Kelly 1 unless otherwise stated.
2. On 6 October 2025, Moog was granted an injunction over the Sites on the terms set out in the order of the Honourable Mr Justice Thompsell dated 6 October 2025 (sealed 8 October 2026) (the **"Injunction Order"**). The Injunction Order provides, at paragraph 7, that the injunction is to be reviewed annually. In an application dated 28 July 2026, Moog applied for the Injunction Order to be reviewed. A review hearing has been listed to take place within a three-day window from 18 November 2026, with a time estimate of half a day (the **"Review Hearing"**).

3. In advance of the Review Hearing, I make this statement in support of Moog's applications to:
  - (a) Join the sixth, seventh, eighth and ninth defendants (the “**Named Defendants**”) to these proceedings pursuant to Part 19.2 of the Civil Procedure Rules (the “**CPR**”) (the “**Joinder Application**”); and
  - (b) Amend the Particulars of Claim and the Claim Form in these proceedings to add the Named Defendants to the proceedings pursuant to the Joinder Application; and
  - (c) If, and to the extent required by the court beyond the application dated 28 July 2026 referenced in paragraph 2 above, review the injunction granted by the Injunction Order,  
  
(together, the “**Applications**”).
4. This statement addresses:
  - (a) **Review:** the effectiveness of the Injunction Order to date despite evidence of the ongoing risk towards the Sites from direct-action protestors since the Injunction Order was obtained, and the reasons why Moog has applied for continuation of the relief granted by the Injunction Order (paragraphs 9 to 37);
  - (b) **Notification:** the steps Moog has taken to notify potential Defendants of the existence of the Injunction Order (paragraphs 38 to 42); and
  - (c) **The Joinder Application:** The Named Defendants, their relevance to these proceedings, and the reasons why Moog seeks the court’s permission to join the Named Defendants to these proceedings and make consequential amendments to the Particulars of Claim and the Claim Form (paragraphs 44 to 49).
5. I am aware that paragraph 7 of the Injunction Order permits Moog to file any evidence in support of the review of the Injunction Order up to 14 days before the Review Hearing. As such, I will update the court if any further information comes to light that is relevant to the Applications or the review of the Injunction Order generally by providing a further witness statement not later than 14 days before the hearing, which is currently listed in a three-day window between 18 and 20 November 2026.
6. Facts in this witness statement are true to the best of my knowledge, information and belief. Where such matters are not within my personal knowledge, I have stated the source of such matters, information and belief.
7. As previously, on the advice of the Police, I avoid in this statement mentioning my colleagues at Moog and others by name or providing any other identifying factors in the

interests of protecting their personal safety, given the nature of the Defendants and previous reprisals against other individuals as outlined in Kelly 1.

8. There is exhibited to this witness statement a bundle of true copy documents marked "EK5." References to page numbers in this witness statement are to page numbers found in the bottom right hand corner of exhibit EK5.

## REVIEW

9. Since the Injunction Order was granted on 6 October 2025, Moog has not experienced an incident of the same severity as the Incident of 26 August 2025. In particular, we have not encountered further incidents of aggravated trespass or criminal damage at the Sites. Moog's employees and security staff continue to remain vigilant.
10. Whilst I cannot say for sure, I believe that the Injunction Order has been instrumental in protecting the Sites from further violent protest activity. Having served the Injunction Order, there has been a significant reduction in the severity of the attacks on the Sites, despite:
  - (a) Moog remaining a prominent target of potential Defendants and those sympathetic to the same cause;
  - (b) Unlawful, direct-action protest continuing to be a means of targeting other companies alleged to be involved in the supply of military equipment to Israel by potential Defendants and those sympathetic to the same cause; and
  - (c) Several examples of suspicious and hostile activity taking place at the Sites.

I explain this further below.

## Moog remaining a prominent target

### The Criminal Proceedings

11. I am aware that, notwithstanding the Injunction Order and the ongoing proscription of Palestine Action as a terrorist organisation under the Terrorism Act 2000, Moog continues to be a prominent target of protestors that are affiliated with Palestine Action or sympathetic to its cause.
12. As I explained in Kelly 4, the Named Defendants (referred to in my previous statements as the "Perpetrators") were tried for criminal damage at Birmingham Crown Court between 4 and 18 June 2026 as a result of their role in the Incident (the "**Criminal Proceedings**").
13. The Criminal Proceedings attracted significant publicity (pp. 3-4). Although it is my understanding that all Named Defendants admitted their involvement in causing criminal damage to the Wolverhampton Site during the Criminal Proceedings (pp. 5-7), there was significant support for the Named Defendants, including sympathetic coverage by online

publications such as The Canary (pp. 8-9), which reported the outcome of the Criminal Proceedings in terms describing the Named Defendants as having "*walked free*." There were also statements of support from campaign organisations including CAGE International, a UK-based advocacy organisation (pp. 10-13). Sympathetic protestors, with anti-Moog placards and paraphernalia, were outside the courtroom on each day of the trial (p. 14).

14. For the avoidance of doubt, Moog accepts the legitimacy of peaceful protest activity and does not seek to obstruct the right for individuals and groups to engage in lawful protest, including those protesting outside the court during the trial of the Criminal Proceedings. I mention this activity solely to show the substantial support for the Named Defendants amongst pro-Palestinian protest groups, and Moog's continued prominence as a target of those groups.
15. Ultimately, on 18 June 2026, the jury was discharged after being unable to reach a verdict for the Criminal Proceedings. A re-trial has since been listed for March 2027 (pp. 15-16). Whilst I understand that the Criminal Proceedings were heard relatively swiftly by the criminal courts after the Named Defendants were first charged, the publicity surrounding these proceedings has effectively meant that Moog, the circumstances of the Incident, and the anti-Moog allegations advocated by the Named Defendants as justification for the Incident, have appeared in the media news cycle frequently for months following the Incident.

#### Online publications

16. More generally, I remain concerned that Moog continues to be the subject of sustained adverse publicity and online campaigning. In particular, I am aware of a dedicated website, [www.moog4.org](http://www.moog4.org), which describes itself as bringing together "*research, documents and publicly available information relating to Moog, the Wolverhampton facility, the Moog 4 case [being the Criminal Proceedings] and the wider issues surrounding military exports and international law*" (pp. 17-27). The website lists all of the Moog Sites, and states that components manufactured at Moog's Wolverhampton facility have been shipped to Hatzerim Airbase, where Israel's M-346 fleet is based. The website also states that other Moog businesses have "*shipped extensive quantities of military equipment to Israel since the start of the genocide*" (p. 27). The website describes the Incident as having had a "*measurable impact*" on Moog's exports to Israel (p. 31), which suggests to me that, although unlawful, the Incident is regarded by protestors as an effective means of disrupting Moog's operations.
17. There has also been continued reporting by Declassified UK, which has published a series of articles concerning Moog since July 2025, including in relation to the Injunction Order and the Criminal Proceedings (pp. 33-40 and 50-55). This includes, for example:

- (a) An article from 23 October 2025 confirming the existence of the Injunction Order, and reiterating its claims of Moog's *"links to the Israeli arms industry"* (pp. 33-40);
  - (b) An article from 16 June 2026 alleging that Moog had illegally shipped weaponry from Britain to Israel via Belgium (pp. 45-49); and
  - (c) An article from 18 June 2026 reporting the outcome of the Criminal Proceedings, which again referred to Moog supplying *"UK-made fighter jet components to Israel"* (pp. 50-55).
18. Furthermore, in an inflammatory article on the Campaign Against Arms Trade ("**CAAT**") website (on which the Tewkesbury and Wolverhampton Sites are still listed as targets), Moog has been identified as one of several companies in the UK arming Israel. The article alleges that Moog produces components for a *"F-35 genocide jet"* (p. 56). Such inflammatory language, linking Moog's activities with genocidal warfare, particularly concerns me because I am aware from public reporting of the Criminal Proceedings that one of the Named Defendants justified their role in the Incident as necessary in order to save lives (pp. 96-97). Violent reprisals may occur if protestors continue to associate Moog's operations with the deaths of innocent people.
19. I am aware that campaign organisations, including CAGE International and CAAT, have published material calling for more scrutiny of Moog's operations and, in the case of CAAT, have launched a campaign calling for the suspension and review of Moog's export licences (pp. 56-59).
20. I believe that this sustained online and campaigning activity keeps Moog, and the Sites in particular, prominent in the minds of individuals sympathetic to the cause espoused by the Defendants and the Named Defendants and increases the risk of further organised or individual direct action.

#### Local campaigns

21. I am also aware of localised campaign activity and anti-Moog sentiment in the immediate vicinity of the Sites themselves. On 14 August 2026, a member of Moog's security team found a sticker affixed to a bollard at the Site. The sticker bore the word "MOOG" in stylised lettering incorporating skull imagery, together with the words "Bribery. Corruption. Lies." and included a QR code linking to a further campaign website (p. 64). I have become aware of other anti-Moog memorabilia circulating nearby the sites, including tote-bags, t-shirts, pamphlets, and flags with links to the Declassified website.
22. Furthermore, I have been informed of an incident at a pub near the Tewkesbury Sites on 30 July 2026 at around 9:45pm, in which a group of Moog employees were confronted while wearing volunteering activity t-shirts saying "Moog in our Communities". The individual who

confronted the group of Moog employees was wearing a hat which said "Make Israel Palestine Again". The individual had asked what it is that Moog does in the community, and when the Moog employees said that they had just returned from a volunteering event, the individual replied "so you make a few bombs and then volunteer, offsetting the bad with the good?".

23. Notwithstanding this behaviour is lawful and Moog does not seek to restrict peaceful protest, the sustained anti-Moog sentiment has led me to believe that Moog continues to be a high-profile target amongst potential Defendants and those in support of their cause. Direct-action unlawful activity also continues to be a popular means of protest, as I now explain.

#### **Direct action at other sites**

24. Since the Injunction Order was granted, I am aware, both from my own review of publicly available reporting and from information provided by my colleagues and peers, that direct-action protest groups of the kind responsible for the Incident have continued to target other companies operating in the defence and aerospace sectors over the past year, notwithstanding the criminal repercussions for those who carry out such attacks. As far as I am aware, the companies that have been the target of the most severe attacks do not benefit from an injunction. I cite some examples of these below.
25. **Martin-Baker Aircraft Co Ltd, Denham:** Martin-Baker's facilities have experienced repeated protest and direct-action activity recently, including an incident on 24 August 2026. Activists from the "People Against Genocide" group occupied the roof of a Martin-Baker facility, stating that the action aimed to disrupt Britain's military support for Israel, with two people arrested on suspicion of criminal damage (pp. 65-67).
26. **UAV Tactical Systems, Shenstone, Leicester and Bristol:** UAV Tactical Systems is targeted so frequently by direct-action groups that the incidents identified below are limited to the last twelve months for the purpose of illustration. These are not exhaustive. They include:
  - (a) a blockade of UAV Shenstone on 9 July 2026, resulting in arrests (pp. 154-156);
  - (b) attempts to allegedly "lock on to person/object/land to cause serious disruption" at UAV Shenstone on 21 September 2026, in which nine people "opposed to Israel's military action in Gaza have been arrested" (pp. 157-158); and
  - (c) a raid on UAV Tactical Systems, Leicester, on 24 April 2026, in which "People Against Genocide" shared footage of activists spraying a red substance and damaging the facility's cleanroom (pp. 159-160).

27. **Elbit Systems:** Elbit Systems and companies associated with it have been the subject of sustained protest and direct-action activity over the past year. For example, from discussions with colleagues I am aware of incidents on 17 July 2026, 6 July 2026, 31 March 2026, 16 March 2026, 11 December 2025 and 20 November 2025.
28. **Other targets:** there has also been comparable direct-action protest activity against other companies during the same period, including:
- (a) a "nationwide day of action" on 9 September 2026 targeting five UK offices of the insurers Chubb and Sompo across London, Manchester, Glasgow and Maidstone, on account of their alleged links to Elbit Systems (pp. 68-69);
  - (b) blockades and protests at BAE Systems sites at Blackburn (26 August 2026), Samlesbury (30 June 2026, 12 May 2026 and 12 March 2026) and Towcester (24 June 2026), together with further incidents on 10 September 2026, 13 July 2026, 3 July 2026 and 8 April 2026, and repeated references to BAE Systems in articles published by Declassified UK (pp. 71-75);
  - (c) a protest against Attewell on 25 March 2026 (p. 161);
  - (d) direct action against DSV, including the sabotage of trucks at its Bristol depot on 22 May 2026, paint and broken windows at its Birmingham office on 23 April 2026, and a blockade on 3 March 2026 (pp. 76-77);
  - (e) paint, damage and a blockade at Keysight Technologies, Telford, on 8 September 2026 (pp. 78-80); and
  - (f) blockades at Instro Precision, Kent, on 26 May 2026 and 12 February 2026 (p. 81).
29. The prevalence of this activity over the past year, as well as the worsening political and military situation in Gaza and the ongoing publicity surrounding the war in the Middle East, suggests to me that there continues to be a real risk of unlawful direct-action protest activity at the Sites if the Injunction Order is not extended.
30. I am aware that Teledyne was granted a renewal of its injunction on 21 July 2026. The injunction documents are located on Teledyne's injunction website found at <https://www.teledyne-injunction.co.uk/>. From my review of these documents I understand that Teledyne was similarly concerned that, without the ongoing relief afforded by its injunction, it would continue to be the target of unlawful protest activity.

#### **Suspicious and hostile activity at Moog Sites**

31. Moog has not experienced direct action of the kind set out above since the Injunction Order was granted. However, there have been several incidents of suspicious activity that further indicate to me that Moog remains a target amongst potential protestors. I understand from

the Police that, following hostile reconnaissance activity at the Wolverhampton Site (explained below), an arrest has been made under the National Security Act 2023 and an investigation is ongoing.

32. Moog maintains a log of suspicious incidents at the Sites, the majority of which have been reported to the police. I set out below a non-exhaustive list of incidents recorded between April and August 2026, which is illustrative of the continuing pattern of hostile reconnaissance and other suspicious activity directed at the Sites, notwithstanding the Injunction Order.

- (a) **7 October 2025 (Wolverhampton):** an unidentified male was observed walking from the direction of the train station towards the Wolverhampton Site, taking photographs directed at the Wolverhampton Site along the way. He left when he noticed security observing him. The incident was reported to the Police.
- (b) **11 November 2025 (Tewkesbury):** overnight, damage consistent with a lorry reversing into it was caused to the perimeter fencing at one of the Tewkesbury Sites. The matter was reported to the Police although Moog is not aware that the culprit has been identified.
- (c) **20 April 2026 (Wolverhampton):** a male individual was seen carrying a drone and moving between the front and delivery gates. The Police were contacted.
- (d) **7 April 2026 (Luton):** an individual was found late at night reading the Injunction Order signage and asking security what equipment was kept on site. He was told to leave and the police were called.
- (e) **28 May 2026 (Wolverhampton):** security recognised one of a group of four males as a suspected regular member of a pro-Palestine direct-action group whilst the four males were at a bus stop located outside the Wolverhampton Site. The individuals were seen potentially filming the Site as they passed by on the bus. The police attended and the individual recognised was later identified by name, although Moog has not been informed of the individual's identity.
- (f) **14 August 2026 (Wolverhampton):** an anti-Moog sticker, reading "Bribery. Corruption. Lies." was found affixed to a bollard at the Site.
- (g) **16 August 2026 (Wolverhampton):** a drone was spotted at 03:05; police were called and attended the Site.
- (h) **24 July 2026 (Tewkesbury):** police informed security that nearby buildings had recently been painted with red paint, believed to be the work of suspected protestors, and warned that industrial sites in the area might be targeted.

I exhibit at pp. 82-83 Moog's underlying incident log (with identifying information redacted for safety purposes), from which the table above is derived.

33. I am particularly concerned that the pattern of incidents described above, together with the sustained press and online attention to Moog, has had a real effect on the sense of safety of Moog's employees at the Sites, in particular at the Wolverhampton Site. We have sought to mitigate this as much as possible. Moog provides employees with training on See, Check and Notify (in relation to hostile reconnaissance), together with state threat and insider threat training, supplemented by near-weekly security messaging in the site newsletter and by email. Moog also provides support to employees through an Employee Assistance Programme, Bupa medical cover, Mental Health First Aiders, and an open-door policy with HR and Security, together with confidential support channels.

### **Review of the Injunction Order**

34. Whilst I cannot say for certain, it is my belief that the Injunction Order has been effective in protecting the Sites from the type of violent direct action seen in the Incident and at other companies operating in the defence and aerospace sectors. The Injunction Order, along with Moog's security protocols and good relationship with the Police, has provided Moog's employees with some reassurance about the threat from direct-action protest.
35. I exhibit to this statement an email from the Police (with the identities of the sender redacted for safety purposes), which confirms the Police's view that the Injunction Order has been effective at preventing the reoccurrence of unlawful activity (p. 84).
36. However, for the reasons set out above, I believe Moog and the Sites remain a target for individuals sympathetic to pro-Palestinian causes such as that espoused by the Defendants and the Named Defendants. I understand from my conversations with the Police that they agree with this assessment. Whilst the Wolverhampton Site has experienced the greatest volume of suspicious activity and remains the primary focus of press and campaign attention, the existence of all Moog Sites are public knowledge. As shown by the incidents described above at the other Sites, the wider Moog estate remains at risk and continues to require the protection of the Injunction Order.
37. I understand from Moog's solicitors that Moog continues to be under a duty of full and frank disclosure. With that in mind, I wish to make it clear that the Reading Site is no longer involved in the operations set out in paragraph 42 of Kelly 1. As I explained in that paragraph, Moog is in the process of closing this facility. As such, its employees no longer attend the Reading Site. Nevertheless, Moog continues to own the leasehold interest in the Reading Site exhibited to Kelly 1, and will do so until late-2027, assuming it can negotiate an early surrender of its lease, which expires in 2029. Both facilities at the Reading Site continue to be guarded by security personnel and are access controlled. The Reading Site

continues to be named online as one of the Sites. It continues to be at risk of incursion from protestors and, whilst I am aware that the repercussions of any direct-action activity will not directly affect operations at the Reading Site, there is nonetheless a significant risk of property damage if the Reading Site is not protected by the injunction.

## NOTIFICATION

38. Pursuant to paragraph 8 of the Injunction Order, service of the Injunction Order was dispensed with, pursuant to CPR 6.28 and CPR 81.4(2)(c).
39. Moog has taken active steps to ensure that the Defendants have received notice of the existence of the Injunction Order, pursuant to the requirements of the Injunction Order.
40. Details of the steps taken to notify the Injunction Order on the Defendants are set out in Schedule 1 to this statement. This includes:
  - (a) Evidence of the steps taken by Moog to ensure notification in compliance with the paragraph 9(ii) and (iii) and 10(ii) of the Injunction Order and photograph evidence of the same; and
  - (b) a screenshot from the website [www.moog.co.uk/injunction](http://www.moog.co.uk/injunction) (the “**Injunction Website**”), with copies of the Injunction Order and other documents in these proceedings uploaded to the Injunction Website, pursuant to paragraph 9(i) and 10(i) of the Injunction Order. The Injunction Order and accompanying documents were uploaded to the Injunction Website on 15 October 2025. I have accessed the Injunction Website and can confirm it remains accessible.
41. Security coverage is in place at all sites 24 hours per day. At the Tewkesbury Sites, the signage is checked daily as part of the guards' routine walkarounds of the Site. At the Luton Site, the signage is checked daily by staff as they pass through the Site's access and egress points, and designated staff members keep a constant watch to ensure the signage remains in place. At the Wolverhampton Site, the signage is likewise checked daily to ensure it remains in place.
42. I have also been made aware that publications which I understand to be sympathetic to direct-action protestors such as Declassified (referred to in Kelly 1), have publicised the existence and consequences of the Injunction Order online (pp. 87-93).

## THE JOINDER APPLICATION

43. I understand from Moog's solicitors that, as the Named Defendants' identities are known, they do not fall under the category of 'Persons Unknown' and that in order to ensure that the Injunction Order would be enforceable against them if they were to act in breach of it, they should be joined as named defendants to the claim.

44. I further understand from discussions with the Police that the Named Defendants continue to be subject to the same bail conditions as handed down at the plea and preparation hearing which took place at the Central Criminal Court on 27 February 2026 (the “**Bail Conditions**”). The Bail Conditions include:
  - (a) an electronically monitored curfew between 10pm and 7am;
  - (b) signing at a local police station twice a week between 9am and 11am;
  - (c) an exclusion from the Wolverhampton Site;
  - (d) A prohibition on going within 500 metres of any of the Sites; and
  - (e) A prohibition on contacting the other Named Defendants except when attending court, and not to delete messaging or internet history.
45. I am aware that the Bail Conditions are stringent. However, the Bail Conditions alone do not stop the Named Defendants from assisting other individuals in carrying out activities prohibited by the Injunction Order. Because of this, Moog wishes to join the Named Defendants to the proceedings in order to ensure that they are aware of the terms of the Injunction Order, including the prohibition on any person doing anything which helps or permits the Defendants from breaching the terms of the Injunction Order.
46. Furthermore, if the Named Defendants are subsequently acquitted at the re-trial of the Criminal Proceedings, the Bail Conditions will no longer apply. There is then a real risk, given the Named Defendants have sought to justify their unlawful activities during the Incident on account of their pro-Palestinian sympathies (as I explain above), that they will directly target the Moog Sites as they are not ‘Persons Unknown’ falling within the Injunction Order.
47. As I explained earlier in this statement, the Named Defendants all admitted their role in causing the Incident. I also understand from public reporting about the Criminal Proceedings that none of the Named Defendants expressed remorse for carrying out the Incident, and continued to promote the causes for which they sought to justify having carried out the Incident during their witness evidence at trial (pp. 94-98). As such, I believe there is a real, ongoing risk of the Named Defendants carrying out the sort of activity that the Injunction Order seeks to prevent.
48. With regards to the timing of the Joinder Application, circumstances have changed since I made Kelly 1. At that time, whilst the Named Defendants’ identities were known to Moog, they were remanded in custody and as such were unlikely to be in a position to undertake the activities prohibited by the Injunction Order. The Named Defendants were subsequently released on bail pending the trial for the Criminal Proceedings in June 2026. Should that trial have resulted in an acquittal (such that the Bail Conditions did not apply), it is likely

Moog would have needed to make an urgent application to join the Named Defendants as parties at that time.

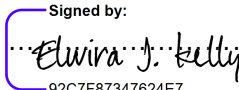
49. However, the June 2026 trial resulted in a mistrial, with the hearing fixed now for March 2027. The Named Defendants remain subject to the Bail Conditions. I am aware of the risk that, should the Named Defendants be acquitted at the March 2027 trial, or should there be another mistrial, there is at least a real possibility that the Bail Conditions will no longer apply, and (as explained above) the Injunction Order, at present, would not be enforceable against them.

## CONCLUSION

50. For the reasons set out above, I respectfully ask the Court to renew the Injunction Order, save that I ask the Court to add the Named Defendants as parties.
51. I believe that, without renewal of the Injunction Order, the Sites remain at real risk of further unlawful direct-action activity of the kind described in this statement and in my previous statements.

## 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.

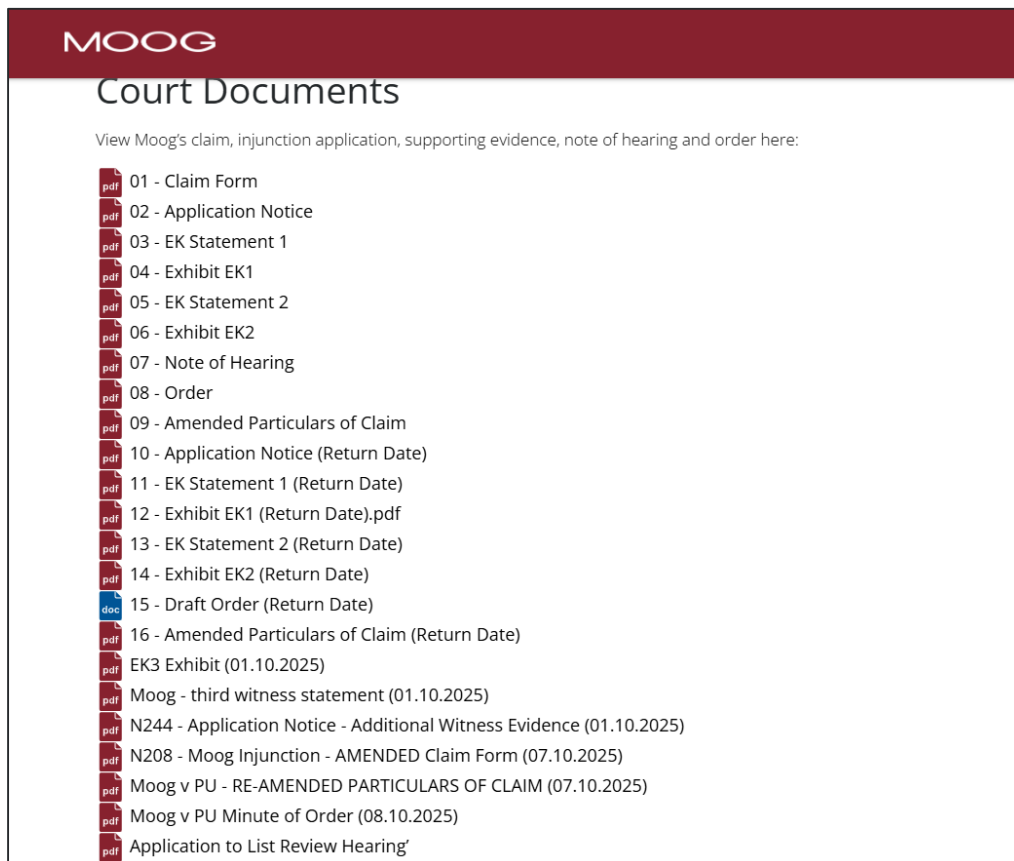
Signed  Signed by:  
92C7F87347624E7...  
Elwira Kelly

DATED this 2<sup>nd</sup> day of October 2026.

## Schedule 1

### Notification of Injunction Order

#### A. Screenshot of the Moog injunction website



**B. Signage****Wolverhampton Site**

| <b>Steps taken to comply with requirements of Injunction Order</b>                                                                                                                                                                                                                                                                                                                                              | <b>Photographs</b>                                   | <b>Date / time</b>                                                                                                                          |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Copies of the Injunction Order in plastic envelope, and warning notices contained in the Injunction Order put up at all prominent locations (pursuant to paragraph 14 of the Injunction Order) (the “<b>Prominent Locations</b>”).</p> <p>For speed, these were initially displayed in A3 size whilst awaiting permanent A2 boards to arrive (as permitted by paragraph 9(iii) of the Injunction Order).</p> | pp. 132-141                                          | Displayed on 10 October 2025 by 19:00 BST                                                                                                   |
| A2 boards erected                                                                                                                                                                                                                                                                                                                                                                                               | Examples of permanent A2 boards found at pp. 142-143 | Temporary A2 signs erected a week after the A3 signs (around 17 October 2025). Permanent A2 boards and signs displayed on 18 December 2025. |

**Luton Site**

| <b>Steps taken to comply with requirements of Injunction Order</b>                   | <b>Photographs</b> | <b>Date and time</b>                  |
|--------------------------------------------------------------------------------------|--------------------|---------------------------------------|
| Copies of the Injunction Order in plastic envelope, and warning notices contained in | pp. 99-106         | Displayed on 22 October at 12:38 BST. |

|                                                                                                                                                                                                                               |             |                                |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|--------------------------------|
| the Injunction Order put up at all Prominent Locations.<br><br>For speed, these were initially displayed in A3 size whilst awaiting permanent A2 boards to arrive (as permitted by paragraph 9(iii) of the Injunction Order). |             |                                |
| A2 boards erected                                                                                                                                                                                                             | pp. 107-112 | Displayed on 17 November 2025. |

**Reading Site**

| <b>Steps taken to comply with requirements of Injunction Order</b>                                                                           | <b>Photographs</b> | <b>Date and time</b>                      |
|----------------------------------------------------------------------------------------------------------------------------------------------|--------------------|-------------------------------------------|
| Copies of the Injunction Order in plastic envelope, and warning notices contained in the Injunction Order put up at all Prominent Locations. | pp. 113-124        | Displayed on 16 October 2025 by 13:25 BST |
| Further signage put up on south-east boundary at the site                                                                                    | p. 125             | Displayed on 23 October 2025.             |

**Tewkesbury (Commercial Aircraft) Site**

| <b>Steps taken to comply with requirements of Injunction Order</b>                   | <b>Photographs</b> | <b>Date and time</b>                      |
|--------------------------------------------------------------------------------------|--------------------|-------------------------------------------|
| Copies of the Injunction Order in plastic envelope, and warning notices contained in | pp. 126-129        | Displayed on 17 October 2025 by 13:40 BST |

|                                                                 |             |                            |
|-----------------------------------------------------------------|-------------|----------------------------|
| the Injunction Order put up at all Prominent Locations.         |             |                            |
| Further signage put up on western perimeter fencing at the site | pp. 144-148 | Displayed 23 October 2025. |

**Tewkesbury (Industrial) Site**

|                                                                                                                                              |                    |                            |
|----------------------------------------------------------------------------------------------------------------------------------------------|--------------------|----------------------------|
| <b>Steps taken to comply with requirements of Injunction Order</b>                                                                           | <b>Photographs</b> |                            |
| Copies of the Injunction Order in plastic envelope, and warning notices contained in the Injunction Order put up at all Prominent Locations. | pp. 149-153        | Displayed 17 October 2025. |