

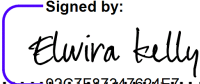
On behalf of Claimant
E Kelly: 3rd
01 October 2025
Exhibit “EK3”

HIGH COURT OF JUSTICE
CHANCERY DIVISION

CLAIM NO: PT-2025-000910

EXHIBIT EK3

This is the exhibit DW3 referred to in the Witness Statement of Elwira Kelly.

Signed by:

Signed92G7F87347624E7::.....

Name: Elwira Kelly
Position: Senior Vice President, General Counsel and Corporate Secretary
Dated: 01 October 2025



IN THE HIGH COURT OF JUSTICE
CHANCERY DIVISION

Claim No: PT-2025-000910

PT-2025-000910

Before: Mr Justice Meade

Date: 5 September 2025

“This order, though it does not bear the court seal, shall take effect as if it had been sealed. A sealed copy will be provided to the serving party on Monday, 8th September.”

-

BETWEEN:

(1) MOOG WOLVERHAMPTON LIMITED
(Company number 07008386)

(2) MOOG FERNAU LIMITED
(Company number 989895)

(3) MOOG READING LIMITED
(Company number 00586505)

(4) MOOG CONTROLS LIMITED
(Company number 01171948)

Claimants

and

**(1) PERSONS UNKNOWN WHO FOR THE PURPOSE OF PROTEST 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 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 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 ENTER
OCCUPY OR REMAIN ON, OR DAMAGE, THE LAND AND PREMISES
SHOWN EDGED RED ON PLAN 4 BEING MOOG AIRCRAFT GROUP
TEWKESBURY, 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 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

ORDER

PENAL NOTICE

**IF YOU THE WITHIN DEFENDANTS OR PERSONS UNKNOWN OR ANY OF
YOU DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO**

**BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT
AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.**

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

IMPORTANT NOTICE TO THE DEFENDANTS AND PERSONS UNKNOWN

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

BEFORE the Honourable Mr Justice Meade on 5 September 2025

UPON the Claimants having issued this Claim by a Claim Form dated 4 September 2025

AND UPON hearing the Claimants' application for an ex parte interim injunction by
Application Notice dated 4 September 2025

AND UPON READING the Witness Statement of Elwira Kelly dated 4 September 2025

AND UPON HEARING Timothy Morshead KC for the Claimants

AND UPON the Claimants giving and the Court accepting the undertakings set out in Schedule
1 to this Order

IT IS ORDERED THAT:

INJUNCTION

Until the return date or further order of the court:

1. The First Defendants must not:
 - (i) without the consent of the First Claimant, enter, occupy or remain on any part of the land and premises shown edged red on the first plan annexed to this Order at Schedule 2 ("Plan 1") being Moog Aircraft Group Wolverhampton, Valiant Way, Pendeford, Wolverhampton, WV9 5GB,

which for the avoidance of doubt includes the perimeter gates and fencing, including by climbing, breaking windows or external equipment, spray-painting, pouring, depositing, throwing or affixing anything, or 'locking on' to any part thereof by whatever means;

;

- (ii) interfere or attempt to interfere with any of the services serving the land and premises shown edged red on Plan 1, including but not limited to water and/or sewerage pipes.

2. The Second Defendants must not:

- (i) without the consent of the Second Claimant, enter, occupy or remain on any part of the land and premises shown edged yellow on the second plan annexed to this Order at Schedule 2 ("Plan 2") being Moog Controls Ltd, Units C and J Airport Executive Park, President Way, Luton, LU2 9NY, including by climbing, breaking windows or external equipment, spray-painting, pouring, depositing, throwing or affixing anything, or 'locking on' to any part thereof by whatever means;
- (ii) interfere or attempt to interfere with any of the services serving the land and premises shown edged yellow on Plan 2, including but not limited to water and/or sewerage pipes.

3. The Third Defendants must not:

- (i) without the consent of the Third Claimant, enter, occupy or remain on any part of the land and premises shown edged yellow on the third plan annexed to this Order at Schedule 2 ("Plan 3") being Moog Reading Limited, 30 Suttons Business Park, Reading, Berkshire, RG6 1AW, including by climbing,

breaking windows or external equipment, spray-painting, pouring, depositing, throwing or affixing anything, or 'locking on' to any part thereof by whatever means);

- (ii) interfere or attempt to interfere with any of the services serving the land and premises shown edged yellow on Plan 3, including but not limited to water and/or sewerage pipes.

4. The Fourth Defendants must not:

- (i) without the consent of the Fourth Claimant, enter, occupy or remain on any part of the land and premises shown edged red on the fourth plan annexed to this Order at Schedule 2 ("Plan 4") being Moog Aircraft Group Tewkesbury, Ashchurch, Tewkesbury, Gloucestershire, GL20 8NA, which for the avoidance of doubt includes the perimeter gates and fencing, including by climbing, breaking windows or external equipment, spray-painting, pouring, depositing, throwing or affixing anything, or 'locking on' to any part thereof by whatever means;
- (ii) interfere or attempt to interfere with any of the services serving the land and premises shown edged red on Plan 4, including but not limited to water and/or sewerage pipes.

5. The Fifth Defendants must not:

- (i) without the consent of the Fourth Claimant, enter, occupy or remain on any part of the land and premises shown edged red on the fifth plan annexed to this Order at Schedule 2 ("Plan 5") being Moog Industrial Group, Ashchurch Parkway, Tewkesbury, Gloucestershire, GL20 8TU, including by climbing, breaking windows or external equipment, spray-painting, pouring, depositing, throwing or affixing anything, or 'locking on' to any part thereof by whatever means;

- (ii) interfere or attempt to interfere with any of the services serving the land and premises shown edged red on Plan 5, including but not limited to water and/or sewerage pipes
- 6. In respect of paragraphs 1 to 5, the Defendants must not (a) do it himself/herself/themselves in any other way or (b) do it by means of another person acting on his/her/their behalf, or acting on his/her/their instructions.

THE RETURN DATE

- 7. The application for an interim injunction having been made without notice to the Defendants, the application be listed for a return date of 6 October 2025 when the Court will also consider the outstanding parts of the application for injunctive relief.
- 8. The Defendants may file and serve any evidence in response by 29 September 2025. Skeleton Arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the hearing.

SERVICE AND NOTIFICATION

- 9. Service of the Claim Form, the Application for interim injunction and this Order is dispensed with, pursuant to CPR 6.16, 6.28 and 81.4(2)(c).
- 10. The Claim Form, Amended Particulars of Claim, Application Notice, evidence in support and a Note of the Hearing on 5 September 2025 will be notified to the Defendants by the Claimants carrying out each of the following steps:
 - (i) Uploading a copy on to the following website: www.moog.co.uk/injunction
 - (ii) Affixing notices at prominent locations at each of the sites shown edged red on Plans 1, 4, and 5 and edged yellow on Plans 2 and 3 setting out where these

documents can be found and obtained in hard copy or including this information in the warning notices referred to at paragraph 11(iii) below.

11. This Order shall be notified to the Defendants by the Claimants carrying out each of the following steps:

(i) Uploading a copy of the Order on to the following website:
www.moog.co.uk/injunction.

(ii) Affixing a copy of the Order in A4 size in a clear plastic envelope at prominent locations at each of the Sites shown edged red on Plans 1, 4 and 5 and edged yellow on Plans 2 and 3.

(iii) Affixing warning notices of A3 or A2 size at those locations at each of the Sites shown edged red on Plans 1, 4 and 5, and edged yellow on Plans 2 and 3, substantially in the form of the notice at Schedule 3. Any such notices which may initially be affixed in A3 size (which will, for the avoidance of doubt, be effective notification for the purposes of paragraph 14 below) shall be replaced with notices in A2 size as soon as reasonably practicable.

(iv) The warning notices shall include that on the return date the Claimants will be seeking a further order preventing the obstruction of or interference with access to the Sites shown edged red on Plans 1, 4 and 4 and edged yellow on Plans 2 and 3.

12. Notification to the Defendants of any further applications shall be effected by the Claimants carrying out each of the following steps:

(i) Uploading a copy of the application on to the following website:
www.moog.co.uk/injunction

(ii) Affixing a notice at a prominent location at the relevant Site/s shown edged red on Plans 1, 4 and 5 and edged yellow on Plans 2 and 3 stating that the application has been made and where it can be accessed in hard copy and online.

13. Notification of any further documents to the Defendants may be effected by carrying out the steps set out in paragraphs 12(i) and 12(ii) only.
14. In respect of paragraphs 10 to 13 above, effective notification will be deemed to have taken place on the date for each of the Defendants on which all the relevant steps have been carried out.
15. For the avoidance of doubt, in respect of the steps referred to at paragraphs 10(ii), 11(ii), 11(iii), and 12(ii), effective notification will be deemed to have taken place when the documents have all been first affixed regardless of whether they are subsequently removed.

VARIATION

16. Anyone served with or notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimants 72 hours' notice of such application. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Claimants at least 48 hours in advance of any hearing.
17. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
18. The Claimants have liberty to apply to vary this Order.

COSTS

19. Costs reserved.

COMMUNICATIONS WITH THE CLAIMANTS

20. The Claimants' contact details are:

(1) Moog Aircraft Group Wolverhampton, Valiant Way, Wolverhampton, West Midlands WV9 5GB.

(2) mooglegal@moog.com.

Dated: 5 September 2025

SCHEDULE 1 – UNDERTAKINGS

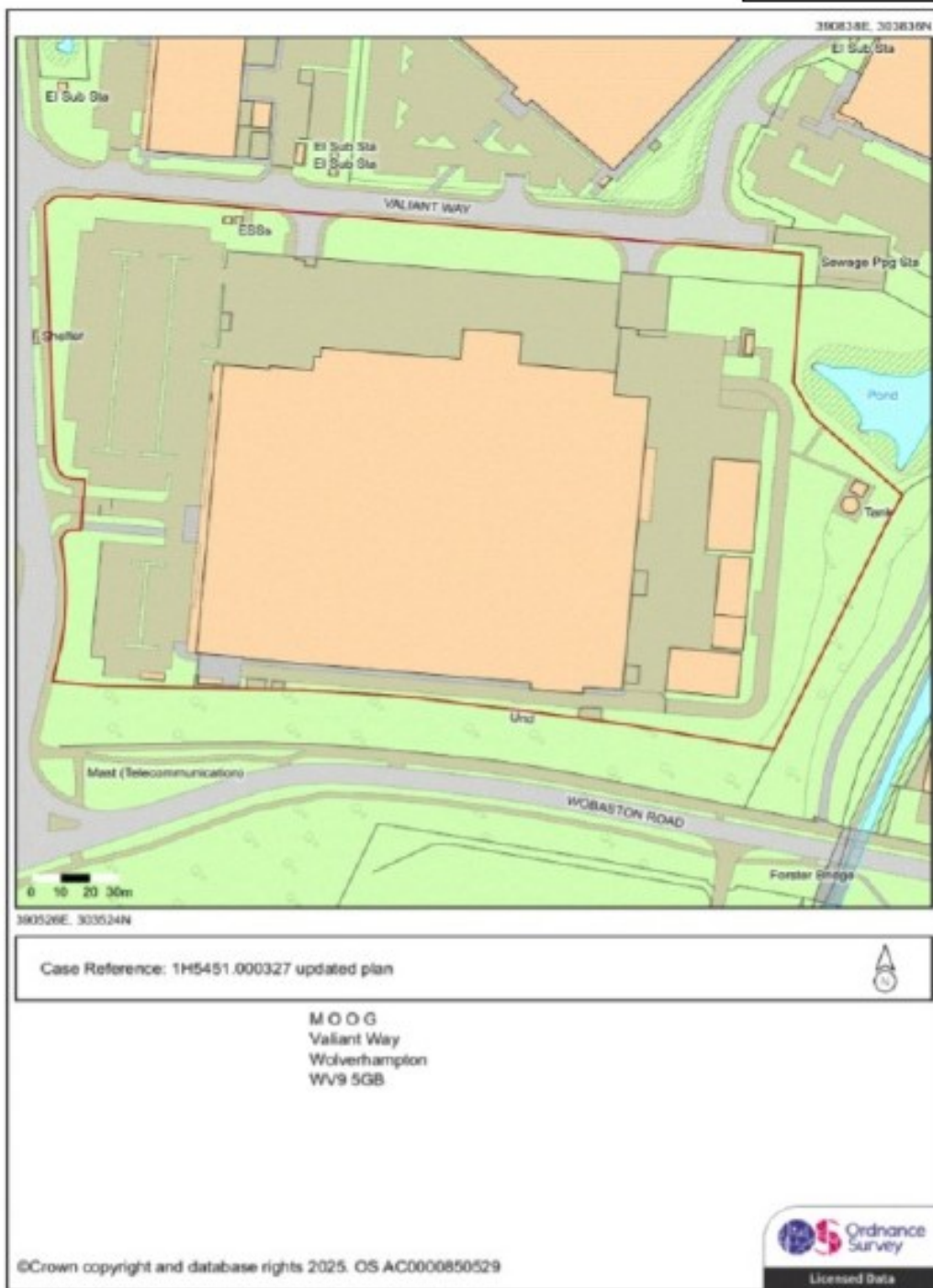
1. The Claimants will take steps to notify Defendants of the Claim Form, Application Notice, evidence in support, the Order and a Note of the Hearing on 5 September 2025 as soon as practicable and no later than 5pm on 8 September 2025.
2. The Claimants will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraphs 1 to 6 of this Order has caused loss to a future Defendant and the Court finds that the future Defendant ought to be compensated for that loss.

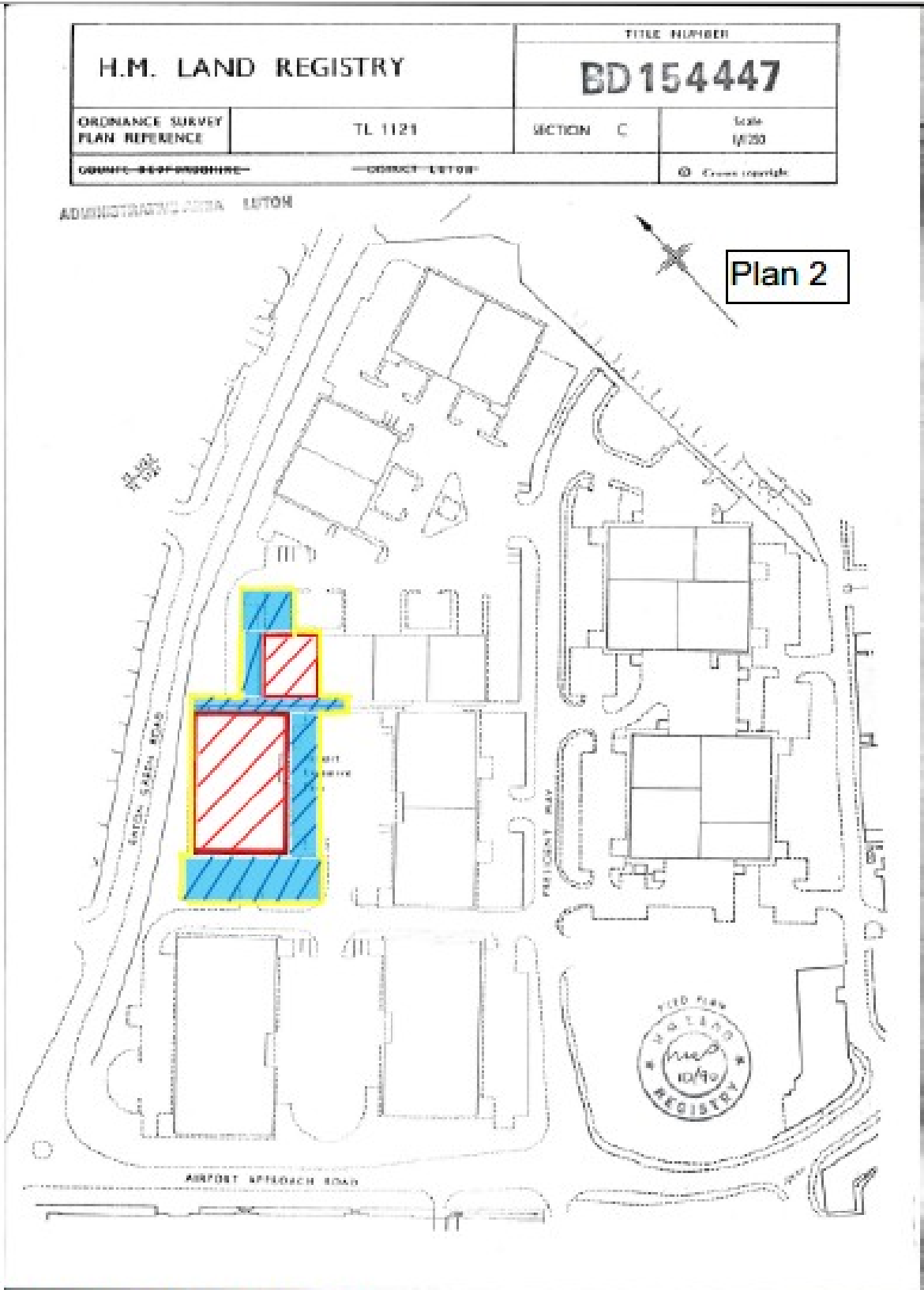
SCHEDULE 2 – PLANS

08/08/2025, 17:22

M O O G Vallant Way, Wolverhampton, WV9 5GB

Plan 1

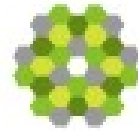




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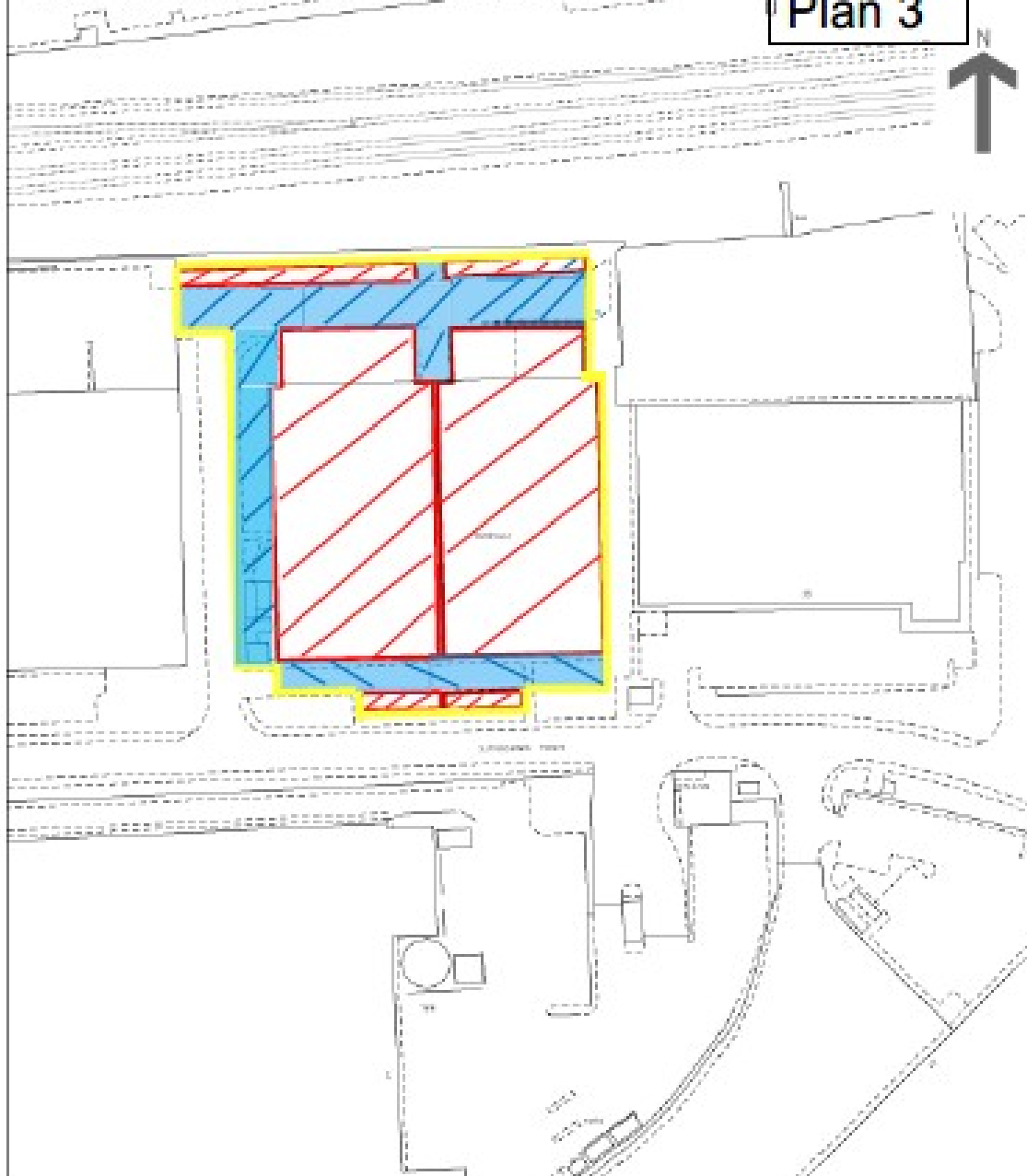
HM Land Registry
Official copy of
title plan

Title number **BK501808**
Ordnance Survey map reference **SU7473NW**
Scale **1:1250**
Administrative area **Wokingham**

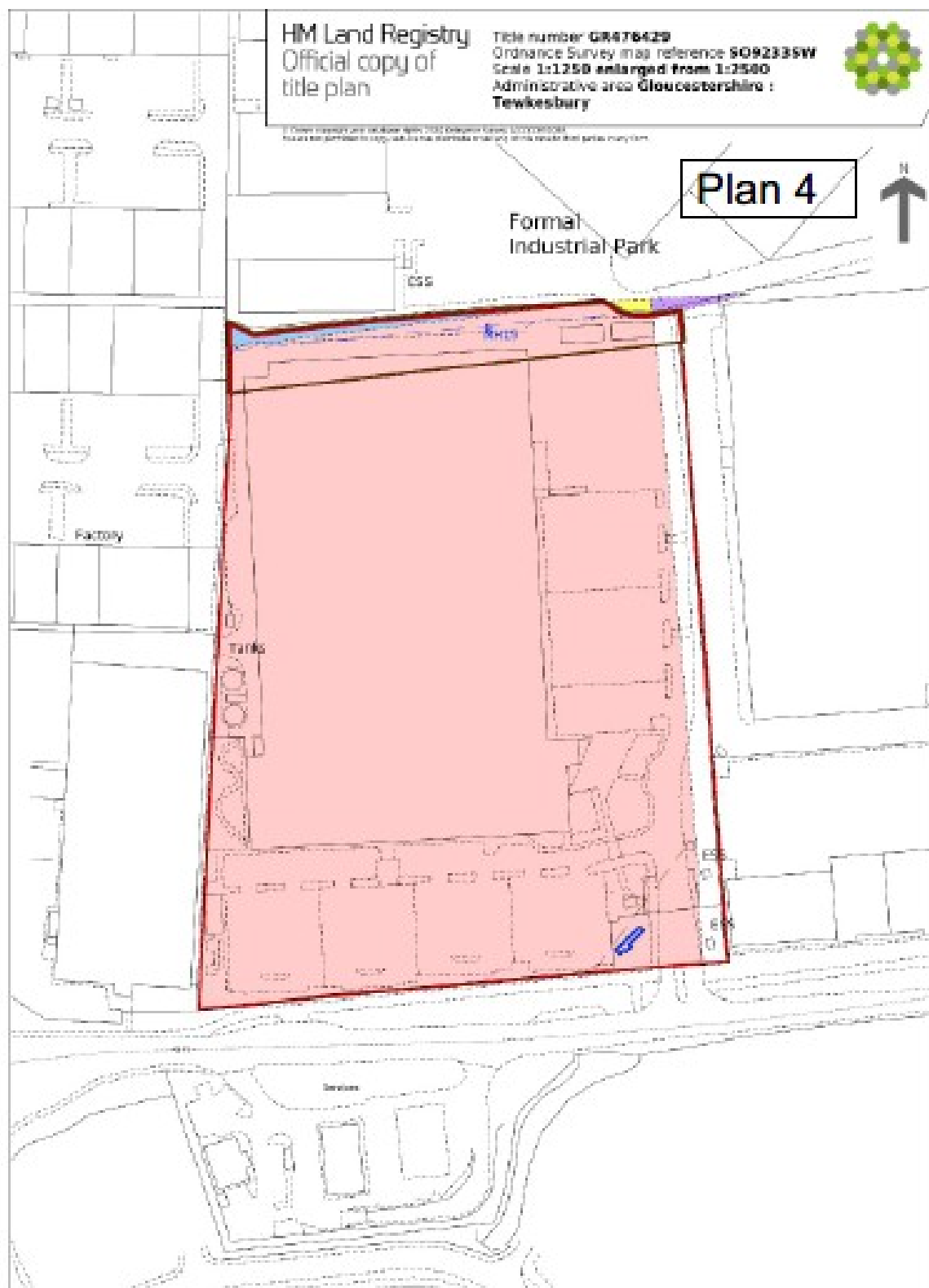


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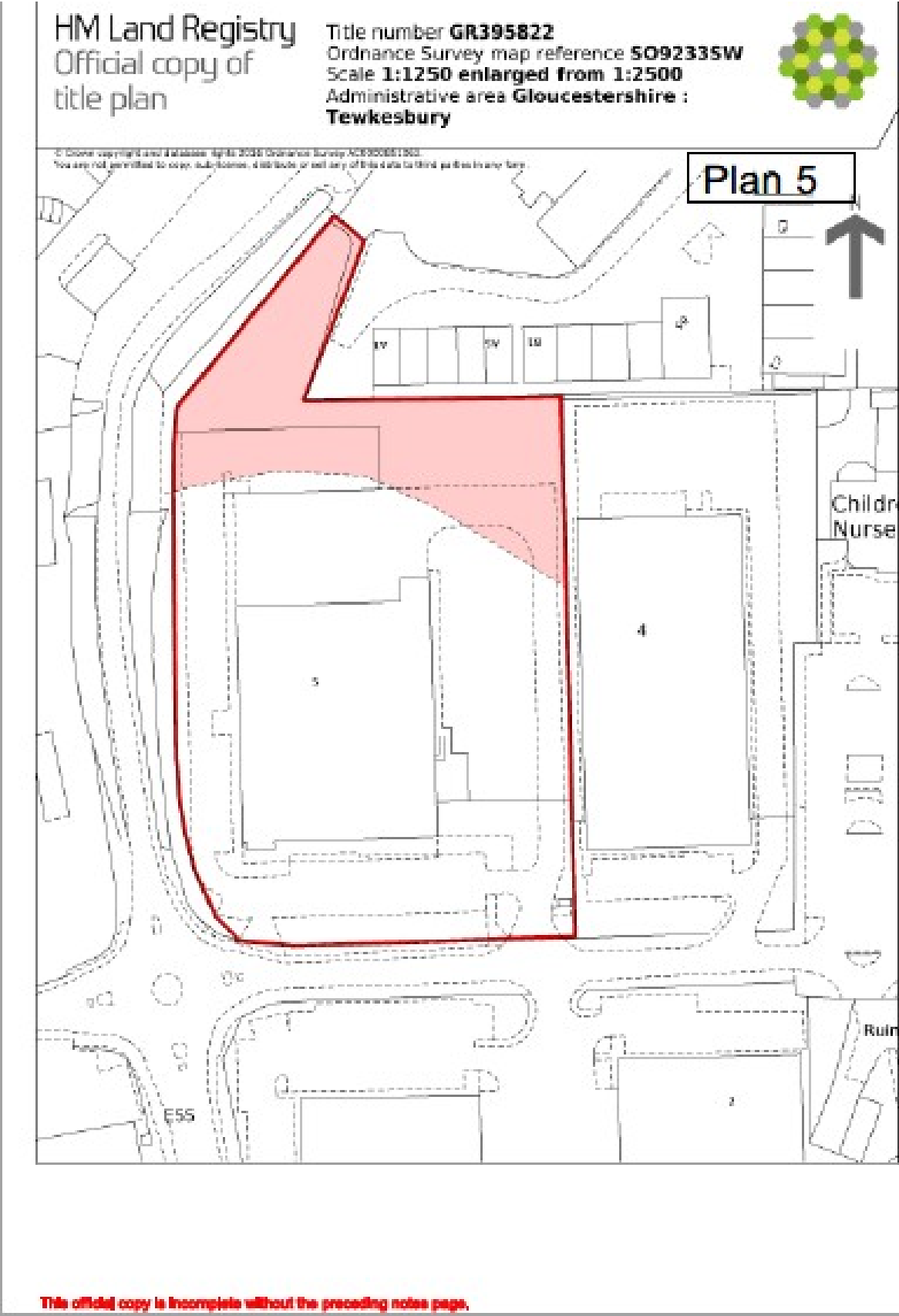
Plan 3



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¹⁷ *See* <http://www.bfja.gov.sg> for more information on the law and Singapore's film industry.



SCHEDULE 3– WARNING NOTICE

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 5 September 2025 exists relating to the land and premises known as Moog Aircraft Group Wolverhampton, Valiant Way, Pendeford, Wolverhampton, WV9 5GB.

The injunction means you may not:

- 1. FOR THE PURPOSE OF PROTEST ENTER OCCUPY OR REMAIN ON THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 1, INCLUDING THE PERIMETER GATES AND FENCING, BEING MOOG AIRCRAFT GROUP WOLVERHAMPTON, VALIANT WAY, WOLVERHAMPTON, WV9 5GB**
- 2. INTERFERE OR ATTEMPT TO INTERFERE WITH ANY OF THE SERVICES SERVING THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 1**

ANYONE BREACHING THE TERMS OF THIS COURT ORDER OR ASSISTING ANY OTHER PERSON IN BREACHING THE TERMS OF THIS ORDER MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE SENT TO PRISON, FINED OR HAVE THEIR ASSETS SEIZED

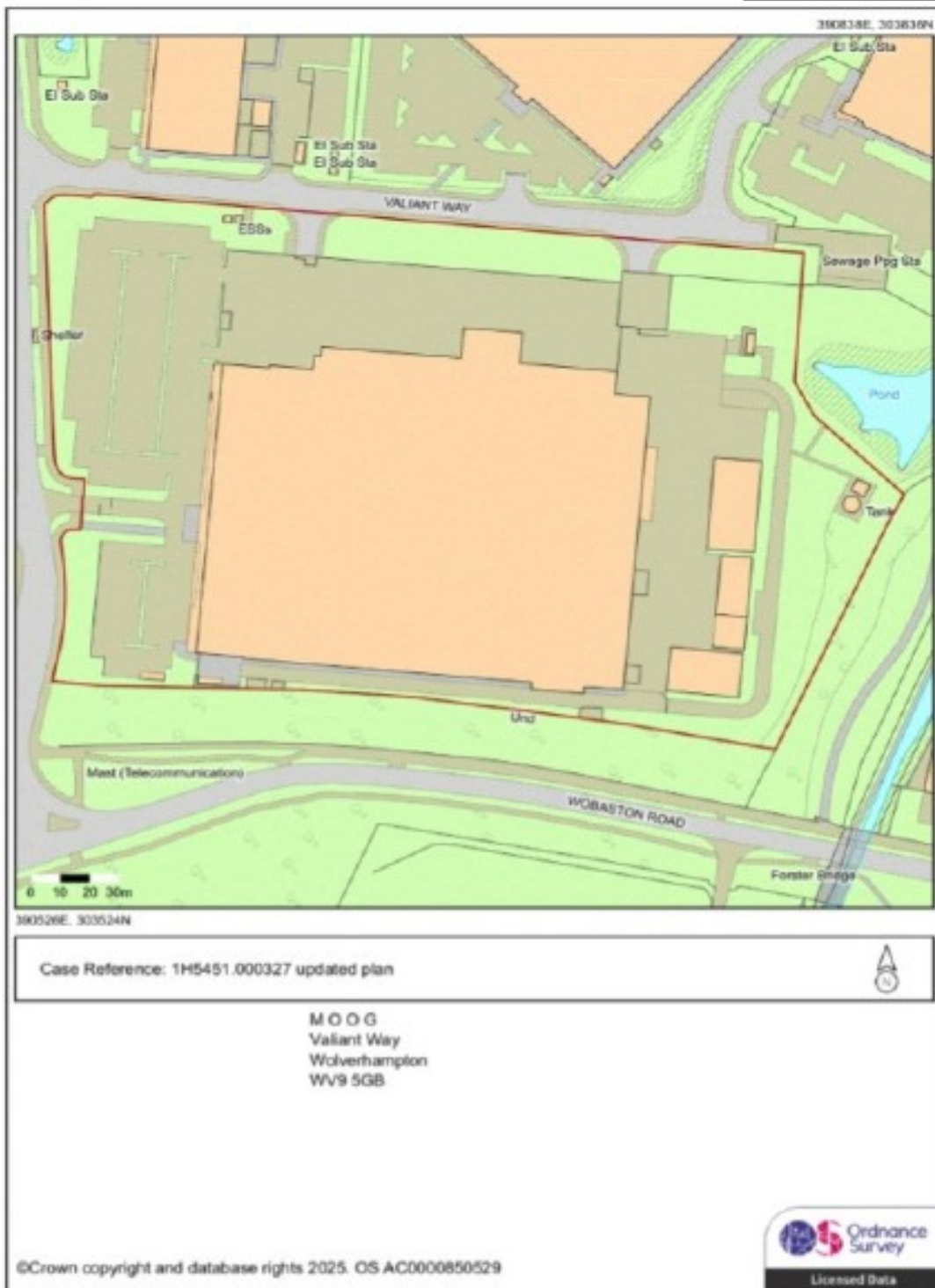
A copy of the Order and the legal proceedings to which it relates can be viewed at www.moog.co.uk/injunction or obtained by e-mailing mooglegal@moog.com

A further hearing in relation to the Order will take place at the Rolls Building, 7 Rolls Building, Fetter Lane, London, EC4A 1NL on 6 October 2025 at which the Claimants will seek an order for a further injunction preventing anyone from obstructing access to or egress from the land and premises shown edged red on Plan 1.

08/09/2025, 17:22

M O O G Valiant Way, Wolverhampton, WV9 5GB

Plan 1



WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No on 5 September 2025 exists relating to the land and premises known as Moog Controls Ltd, Units C and J Airport Executive Park, President Way, Luton, LU2 9NY

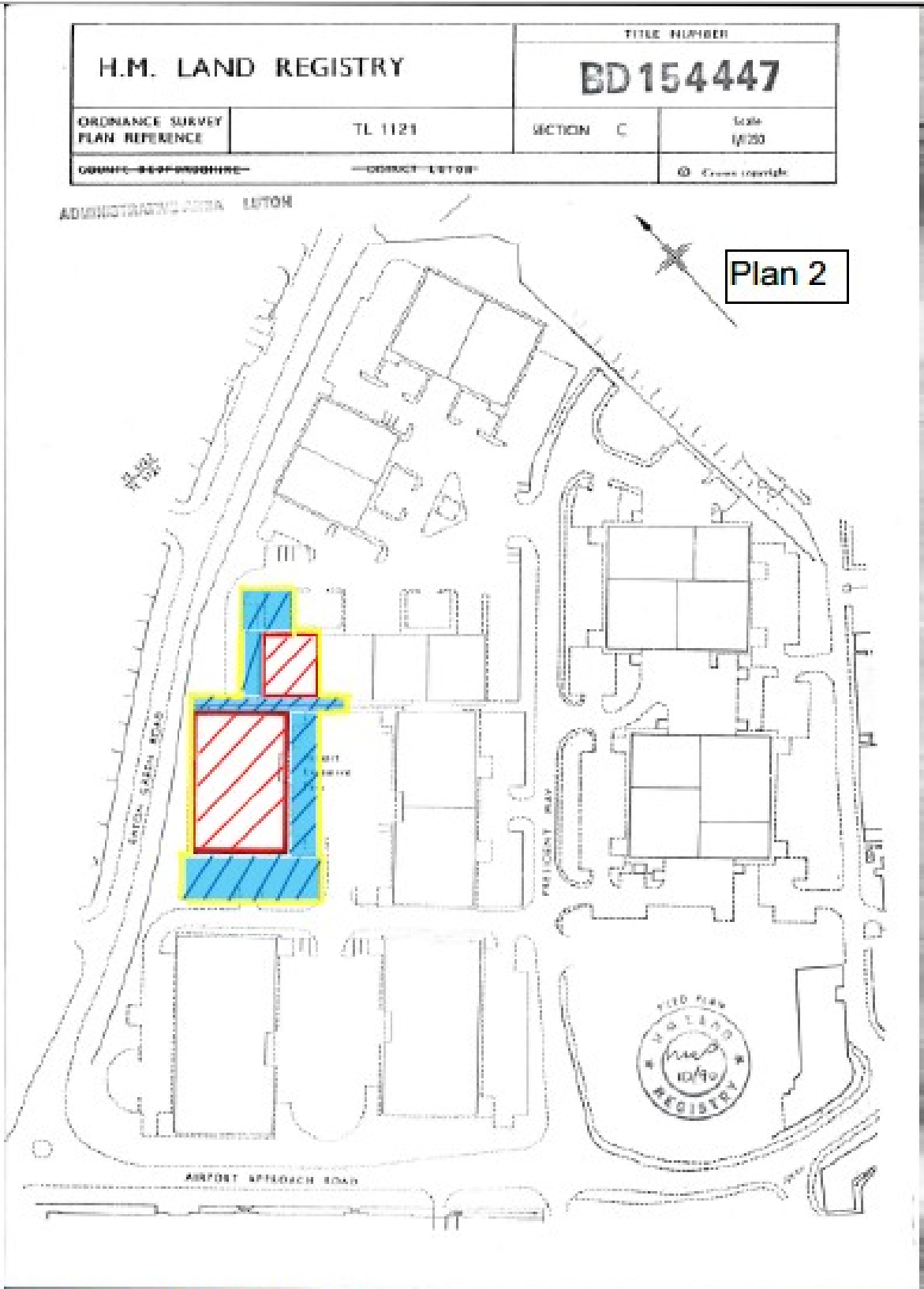
The injunction means you may not:

- 1. FOR THE PURPOSE OF PROTEST ENTER OCCUPY OR REMAIN ON THE LAND AND PREMISES SHOWN EDGED YELLOW ON PLAN 2 BEING MOOG CONTROLS LTD, UNITS C AND J AIRPORT EXECUTIVE PARK, PRESIDENT WAY, LUTON, LU2 9NY**
- 2. INTERFERE OR ATTEMPT TO INTERFERE WITH ANY OF THE SERVICES SERVING THE LAND AND PREMISES SHOWN EDGED YELLOW ON PLAN 2**

ANYONE BREACHING THE TERMS OF THIS COURT ORDER OR ASSISTING ANY OTHER PERSON IN BREACHING THE TERMS OF THIS ORDER MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE SENT TO PRISON, FINED OR HAVE THEIR ASSETS SEIZED

A copy of the Order and the legal proceedings to which it relates can be viewed at www.moog.co.uk/injunction or obtained by e-mailing mooglegal@moog.com

A further hearing in relation to the Order will take place at the Rolls Building, 7 Rolls Building, Fetter Lane, London, EC4A 1NL on 6 October 2025 at which the Claimants will seek an order for a further injunction preventing anyone from obstructing access to or egress from the land and premises shown edged yellow on Plan 2.



This official copy is incomplete without the preceding notes page.

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No _____ on
5 September 2025 exists relating to the land and premises known as **Moog Reading
 Limited, 30 Suttons Business Park, Reading, Berkshire, RG6 1AW**

The injunction means you may not:

- 1. FOR THE PURPOSE OF PROTEST ENTER OCCUPY OR REMAIN ON THE LAND AND PREMISES SHOWN EDGED YELLOW ON PLAN 3 BEING MOOG READING LIMITED, 30 SUTTONS BUSINESS PARK, READING, BERKSHIRE, RG6 1AW**
- 2. INTERFERE OR ATTEMPT TO INTERFERE WITH ANY OF THE SERVICES SERVING THE LAND AND PREMISES SHOWN EDGED YELLOW ON PLAN 3**

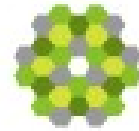
**ANYONE BREACHING THE TERMS OF THIS COURT ORDER OR ASSISTING
ANY OTHER PERSON IN BREACHING THE TERMS OF THIS ORDER MAY BE
HELD TO BE IN CONTEMPT OF COURT AND MAY BE SENT TO PRISON, FINED
OR HAVE THEIR ASSETS SEIZED**

A copy of the Order and the legal proceedings to which it relates can be viewed at www.moog.co.uk/injunction or obtained by e-mailing mooglegal@moog.com

A further hearing in relation to the Order will take place at the Rolls Building, 7 Rolls Building, Fetter Lane, London, EC4A 1NL on 6 October 2025 at which the Claimants will seek an order for a further injunction preventing anyone from obstructing access to or egress from the land and premises shown edged yellow on Plan 3.

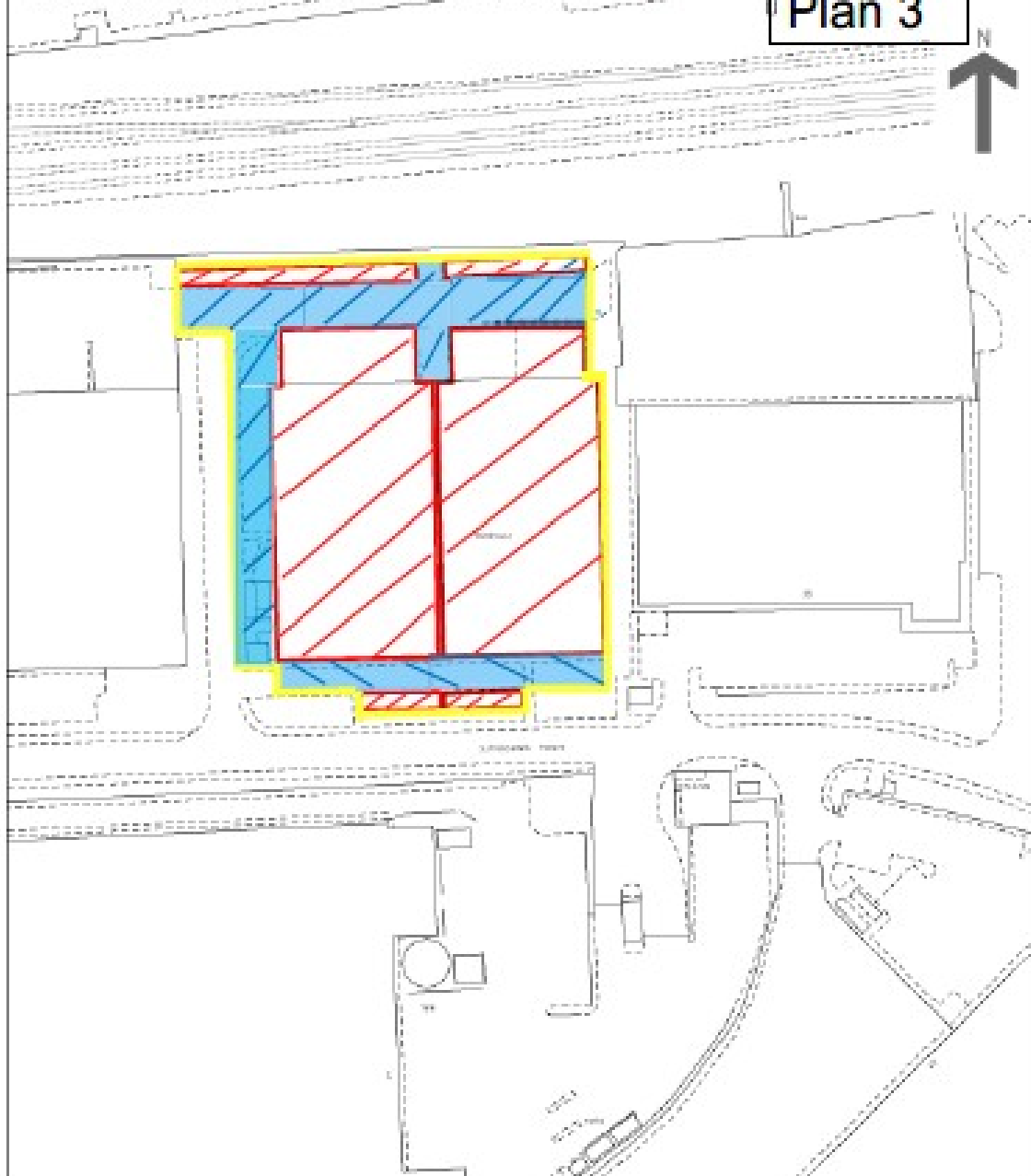
HM Land Registry
Official copy of
title plan

Title number **BK501808**
Ordnance Survey map reference **SU7473NW**
Scale **1:1250**
Administrative area **Wokingham**



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Plan 3



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WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No _____ on 5 September 2025 exists relating to the land and premises known as Moog Aircraft Group Tewkesbury, Ashchurch, Tewkesbury, Gloucestershire, GL20 8NA.

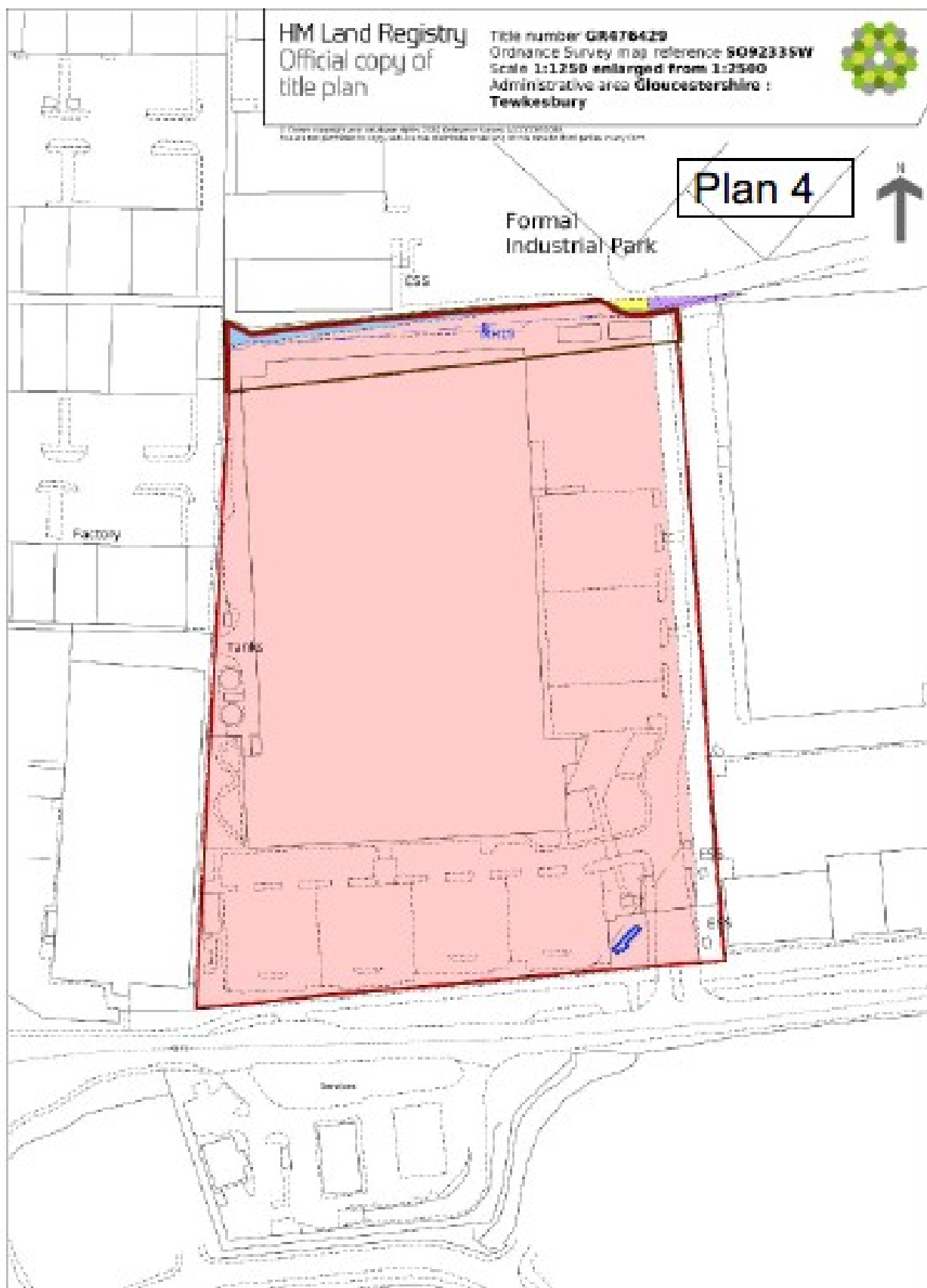
The injunction means you may not:

- 1. FOR THE PURPOSE OF PROTEST ENTER OCCUPY OR REMAIN ON THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 4, INCLUDING THE PERIMETER GATES AND FENCING, BEING MOOG AIRCRAFT GROUP TEWKESBURY, ASHCHURCH, TEWKESBURY, GLOUCESTERSHIRE, GL20 8NA**
- 2. INTERFERE OR ATTEMPT TO INTERFERE WITH ANY OF THE SERVICES SERVING THE LAND AND PREMISES SHOWN EGDED RED ON PLAN 4**

**ANYONE BREACHING THE TERMS OF THIS COURT ORDER OR ASSISTING
ANY OTHER PERSON IN BREACHING THE TERMS OF THIS ORDER MAY BE
HELD TO BE IN CONTEMPT OF COURT AND MAY BE SENT TO PRISON, FINED
OR HAVE THEIR ASSETS SEIZED**

A copy of the Order and the legal proceedings to which it relates can be viewed at www.moog.co.uk/injunction or obtained by e-mailing mooglegal@moog.com.

A further hearing in relation to the Order will take place at the Rolls Building, 7 Rolls Building, Fetter Lane, London, EC4A 1NL on 6 October 2025 at which the Claimants will seek an order for a further injunction preventing anyone from obstructing access to or egress from the land and premises shown edged red on Plan 4.



This official copy is incomplete without the associated index page.

WARNING NOTICE OF COURT INJUNCTION

**A HIGH COURT INJUNCTION granted by the High Court in Claim No on
5 September 2025 exists relating to the land and premises known as Moog Industrial
Group, Ashchurch Parkway, Tewkesbury, Gloucestershire, GL20 8TU**

The injunction means you may not:

- 1. FOR THE PURPOSE OF PROTEST ENTER OCCUPY OR REMAIN ON
THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 5 BEING
MOOG INDUSTRIAL GROUP, ASHCHURCH PARKWAY,
TEWKESBURY, GLOUCESTERSHIRE, GL20 8TU**
- 2. INTERFERE OR ATTEMPT TO INTERFERE WITH ANY OF THE
SERVICES SERVING THE LAND AND PREMISES SHOWN EDGED RED
ON PLAN 5**

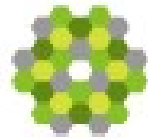
**ANYONE BREACHING THE TERMS OF THIS COURT ORDER OR ASSISTING
ANY OTHER PERSON IN BREACHING THE TERMS OF THIS ORDER MAY BE
HELD TO BE IN CONTEMPT OF COURT AND MAY BE SENT TO PRISON, FINED
OR HAVE THEIR ASSETS SEIZED**

A copy of the Order and the legal proceedings to which it relates can be viewed at www.moog.co.uk/injunction or obtained by e-mailing mooglegal@moog.com:

A further hearing in relation to the Order will take place at the Rolls Building, 7 Rolls Building, Fetter Lane, London, EC4A 1NL on 6 October 2025 at which the Claimants will seek an order for a further injunction preventing anyone from obstructing access to or egress from the land and premises shown edged red on Plan 5.

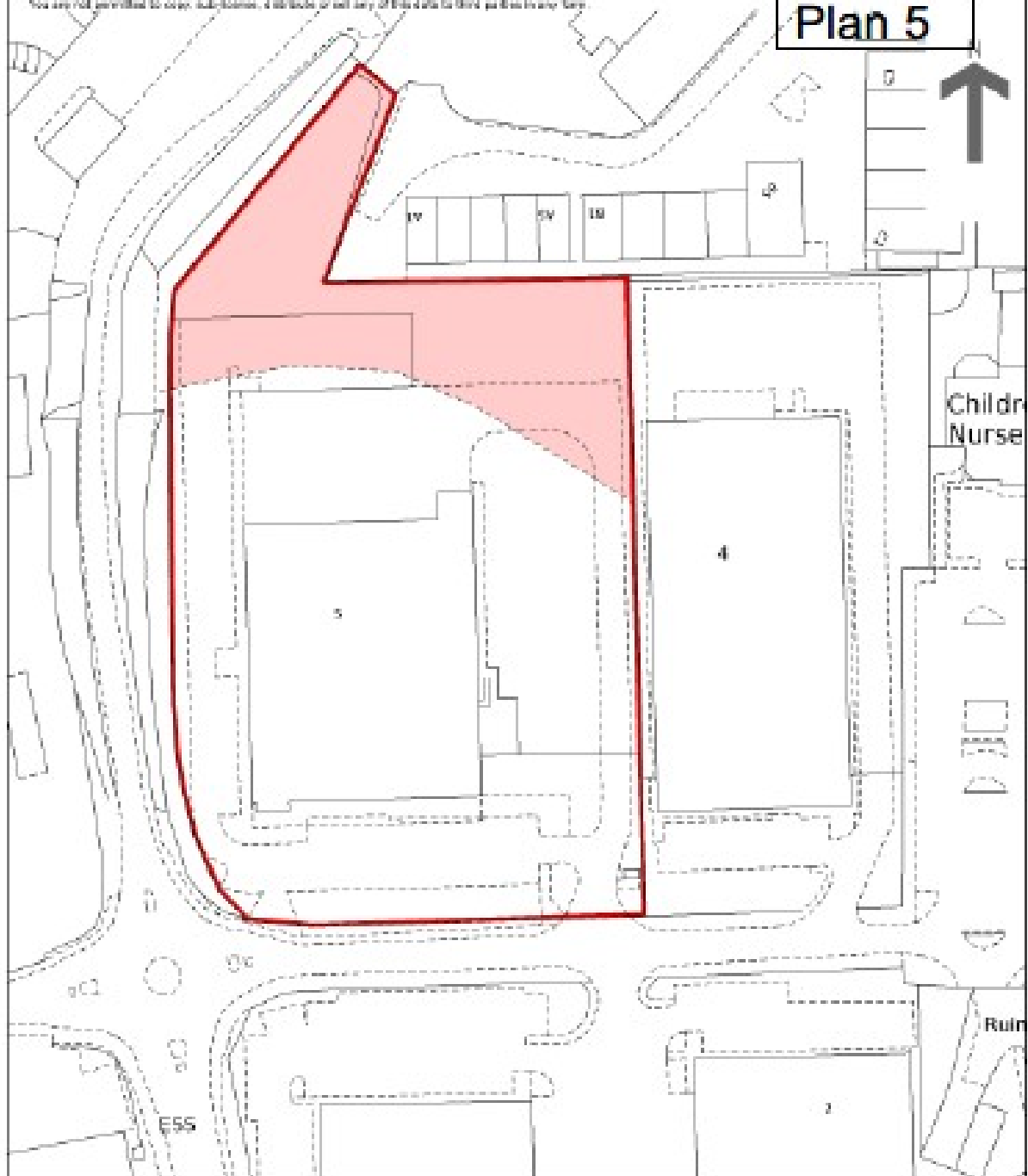
HM Land Registry
Official copy of
title plan

Title number **GR395822**
Ordnance Survey map reference **SO92335W**
Scale **1:1250 enlarged from 1:2500**
Administrative area **Gloucestershire :**
Tewkesbury

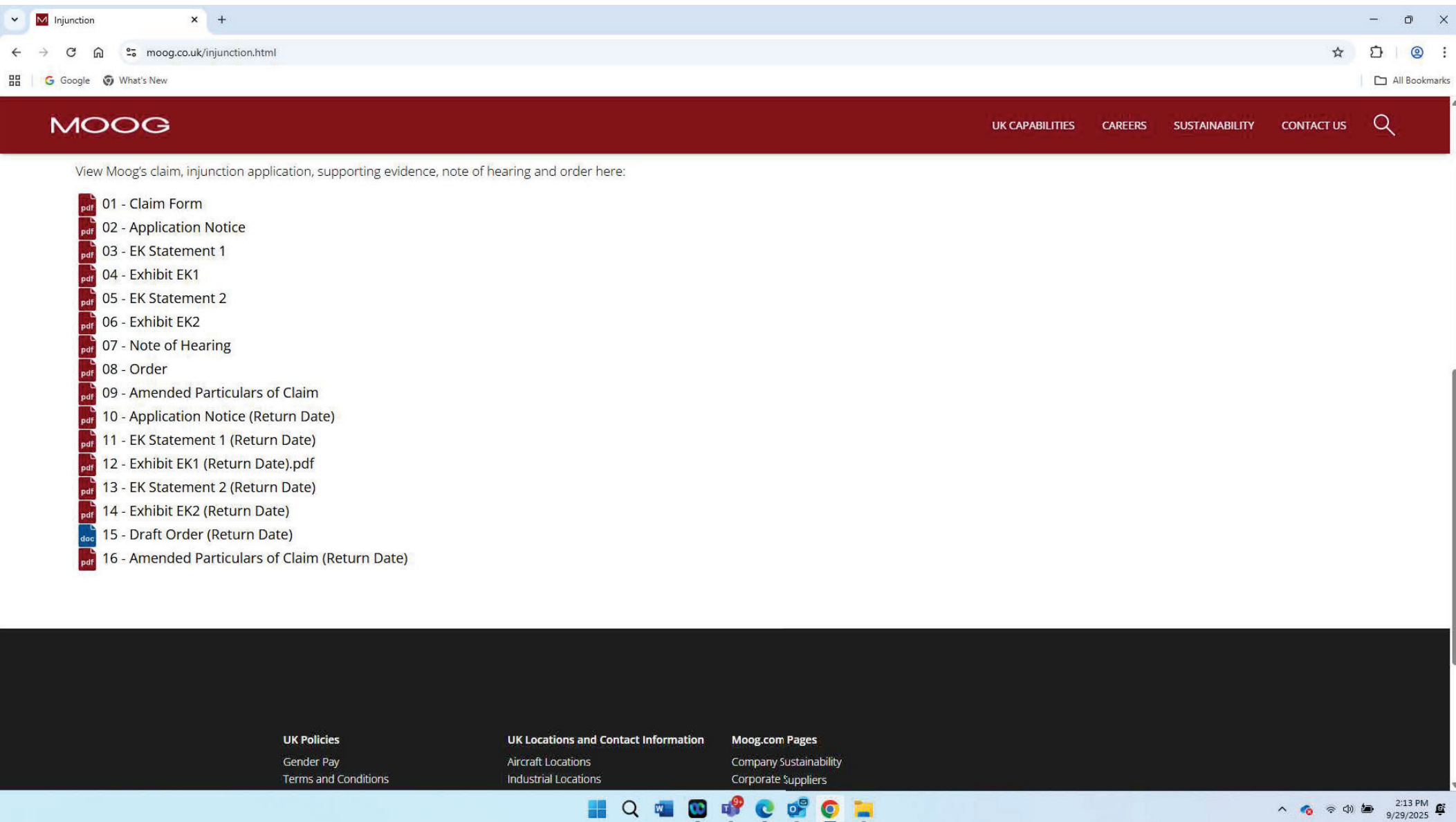


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Plan 5



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1 Tou

1. RECEPTION

2. CANTEEN

3. SOUTH CANTEEN

4. SOUTH CANTEEN
CORRIDOR

5. GYM ENTRANCE

6. WEST OFFICE EXIT

7. ROOF STAIRS

8. Pump RM WEST

9. Pump RM WEST

10. COMPRESSED
AIR. RM

11. EXTENSION WEST
RM

12. EXTENSION FIRE
DOOR

13. EXTENSION FIRE
DOOR

14. EXTENSION
DOOR

5. DISPATCH

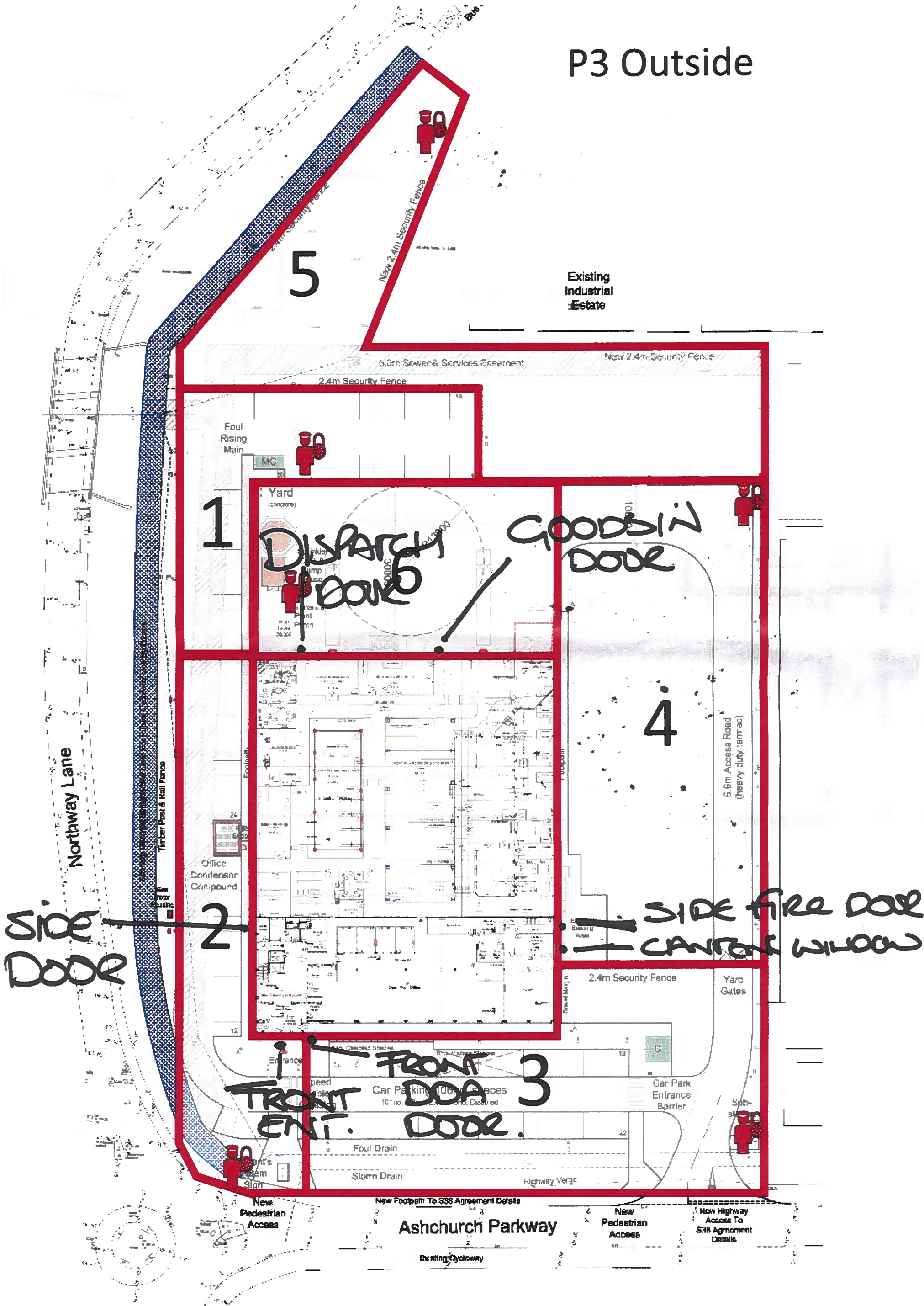
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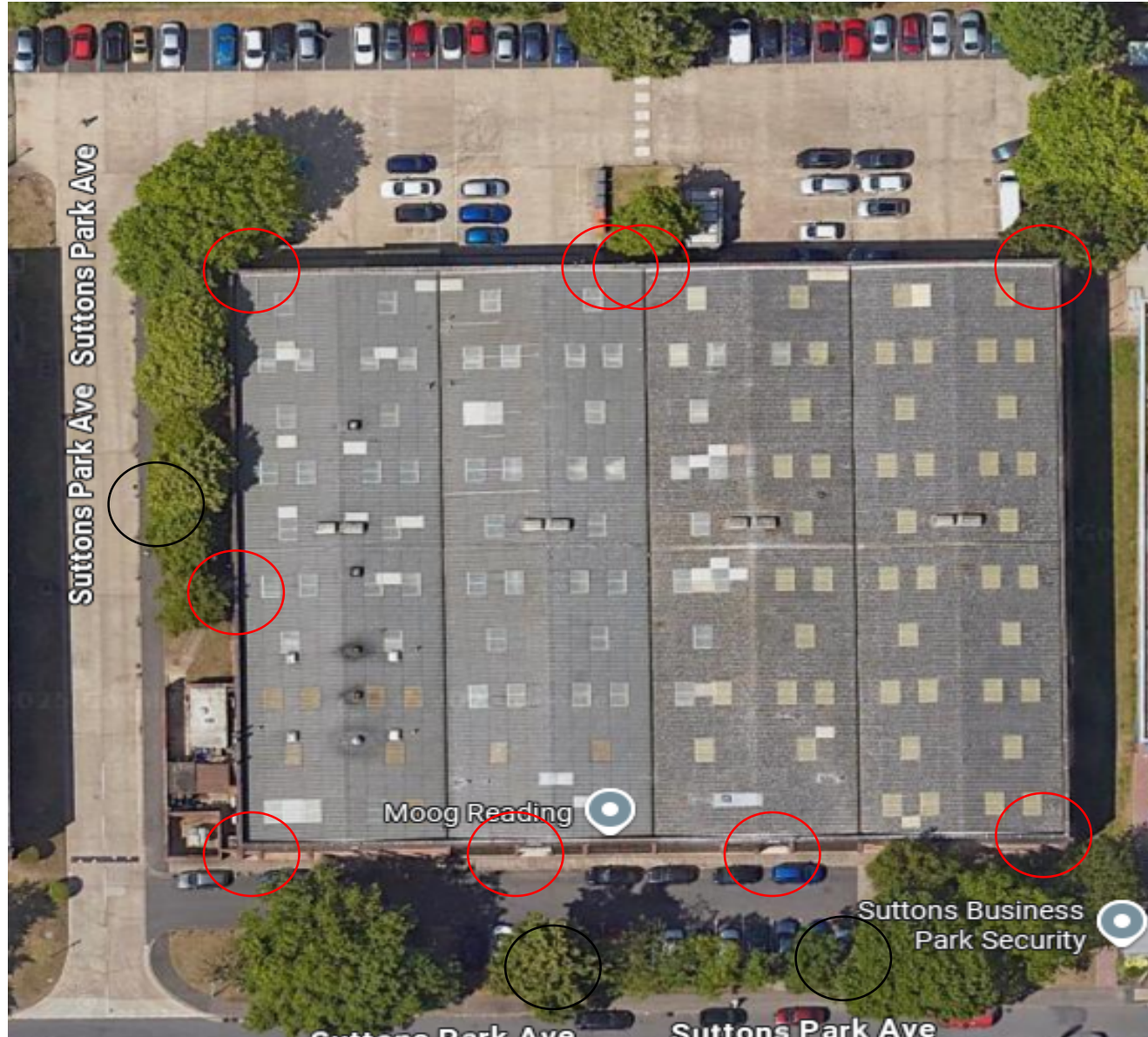


ROAD
BARRIER

11/10/2014 14:10:20

P3 Outside





N244

Application notice

For help in completing this form please read the notes for guidance form N244 Notes.

Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form: <https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>

Name of court High Court of Justice Chancery Division		Claim no. PT-2025-000910	
Fee account no. (if applicable)		Help with Fees (if applicable)	
		H W F - - - - -	
Warrant no. (if applicable)		PT-2025-000910	
Claimant's name (including ref.) MOOG WOLVERHAMPTON LIMITED MOOG FERNAU LIMITED MOOG READING LIMITED MOOG CONTROLS LIMITED			
Defendant's name (including ref.) See Schedule 1			
Interested parties:			
Date		15 September 2025	

1. What is your name or, if you are a legal representative, the name of your firm?

(1) Moog Wolverhampton Limited, (2) Moog Fernau Limited, (3) Moog Reading Limited, (4) Moog Controls Limited

2. Are you a ☒ Claimant ☐ Defendant ☐ Legal Representative ☐ Other (please specify)

If you are a legal representative whom do you represent?

3. What order are you asking the court to make and why?

The Claimants seek (i) an order for the continuation of the interim injunctive relief granted by the Order of Meade J dated 5 September 2025 (the “Order”); and (ii) a further order prohibiting obstruction or interference with access to and/or egress from their land as sought in the Claimant’s application of 4 September 2025 and as provided for in the draft order attached to this application notice.

☒Yes ☐No

5. How do you want to have this application dealt with?

☒at a hearing ☐without a hearing

☐at a remote hearing

6. How long do you think the hearing will last? Is this time estimate agreed by all parties?

1

Hours

30

Minutes

☐Yes ☒No

7. Give details of any fixed trial date or period

Return date of 6 October 2025

8. What level of Judge does your hearing need?

Judge

9. Who should be served with this application?

Defendants

9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

The Claimants will serve / notify the Defendants pursuant to the service / notification provisions in the Order.

10. What information will you be relying on, in support of your application?

☒ the attached witness statement

☒ the statement of case

☐ the evidence set out in the box below

If necessary, please continue on a separate sheet.

11. Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

- ☐ Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.

☒ No

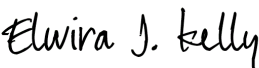
Statement of Truth

I understand that proceedings for contempt of court may be brought against a person 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.

- ☐ I believe that the facts stated in section 10 (and any continuation sheets) are true.
- ☒ The applicant believes that the facts stated in section 10 (and any continuation sheets) are true. I am authorised by the applicant to sign this statement.

Signature

Signed by:



92C7F87347624E7...

- ☒ Applicant
- ☐ Litigation friend (where applicant is a child or a Protected Party)
- ☐ Applicant’s legal representative (as defined by CPR 2.3(1))

Date

Day	Month	Year
15	09	2025

Full name

Elwira Kelly

Name of applicant’s legal representative’s firm

If signing on behalf of firm or company give position or office held

Senior Vice President, General Counsel and Corporate Secretary

Applicant’s address to which documents should be sent.

Building and street

Moog Wolverhampton Limited

Second line of address

Valiant Way

Town or city

Wolverhampton, West Midlands

County (optional)

United Kingdom

Postcode

W | V | 9 | 5 | G | B |

If applicable

Phone number

Fax phone number

DX number

Your Ref.

Email

MoogLegal@moog.com

SCHEDULE 1 - LIST OF DEFENDANTS

- (1) PERSONS UNKNOWN WHO FOR THE PURPOSE OF PROTEST 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 ENTER OCCUPY OR REMAIN ON, OR DAMAGE, THE LAND AND PREMISES SHOWN EDGED RED 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 ENTER OCCUPY OR REMAIN ON, OR DAMAGE, THE LAND AND PREMISES SHOWN EDGED RED 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 ENTER OCCUPY OR REMAIN ON, OR DAMAGE, THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 4 BEING MOOG AIRCRAFT GROUP TEWKESBURY, 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 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

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MOOG KILL PALESTINIANS

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INVESTIGATIONS :

UK AEROSPACE FIRM SUPPLYING ISRAEL’S DEFENCE MINISTRY

Exclusive: Moog in Wolverhampton was targeted by pro-Palestine activists in August. We can now reveal the company has been exporting aircraft components to Israel’s ministry of defence.

JOHN MCEVOY

22 SEPTEMBER 2025



An Israeli air force M-346 Lavi (credit: Hezi Shmueli / Alamy)



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...over the company and entered the factory floor.

The target was Moog, a US-owned engineering company which designs and manufactures components for military aircraft worldwide.

Wearing t-shirts with the faces of Palestinians killed by Israel, the activists proceeded to cut through Moog's roof covering and peer into the factory floor below.

They accused the company of supplying Israel's largest arms firm Elbit Systems with aircraft parts "used to train Israeli pilots to fly F-16 and F-35 fighter jets".

Declassified and *The Ditch* had previously **reported** how Moog sent at least ten shipments of trainer aircraft parts to an Elbit Systems site in Israel between December 2024 and July 2025.

But it can now be revealed that Moog has also been directly supplying Israel's ministry of defence with components used to train Israeli pilots to fly advanced fighter jets.

Cargo documents expose how the aerospace firm sent two shipments for the M-346 Lavi programme in July 2025, with the address corresponding to Israel's defence ministry in Tel Aviv.

The M-346 Lavi is a high-performance aircraft designed to train Israeli pilots to fly jets including the F-16 and **F-35**.

It is estimated that the value of the two shipments could be over £200,000. The total value of Moog exports to Israel since December 2024 is likely in excess of £1m.

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EQUIPMENT**[READ MORE](#)**2,000lb bombs**

The revelation details how the UK government, through its arms export regime, is facilitating the training of Israeli pilots to fly the aircraft dropping 2,000lb bombs on civilians.

This is despite the government having claimed it suspended export licences for equipment that could be used by Israeli forces in Gaza.

Last week, trade minister Chris Bryant attempted to justify this approach, **saying**: “The assessment is that the training of an aircraft pilot on such equipment would take so long that they wouldn’t be the people that would be engaged in fighter combat in Gaza”.

Bryant did not clarify how the government reached this conclusion, but it appears to be misleading.

A US air force report recently **estimated** that it could take four to six months to train Ukrainian fighter pilots to fly F-16 fighter jets. These same aircraft have been **used** by Israeli forces in Gaza, including in an attack on British doctors in January 2024.

Moreover, Bryant’s argument falsely suggests a known end

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reflected the government’s position, and on what basis it is estimated that Israeli pilots training on UK-made components will not go on to use fighter aircraft in Gaza.

The trade department failed to provide any meaningful answers, while the Foreign Office did not respond at all.

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THAT HELPED
BRITAIN SPY
FOR ISRAEL

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M-346 Lavi

Israel received its first M-346 Lavi in 2014, with an additional 29 arriving over the following two years. They are hosted at Hatzerim airbase near Be’er Sheva.

Promotional content shows how the jet not only trains pilots to fly, but also helps them master combat techniques. It is equipped with a “digital avionics system” which is modelled on

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fighters.

“You learn how to fight and then do the transition to the real fighter. You don’t need to learn how to fight again with the real fighter, so you save a lot of hours”.

By 2022, the Israeli air force had **racked** up 50,000 flight hours with the M-346 Lavi, making it the largest user of the jet in the world.

In addition to supplying parts for the M-346, Moog has contributed to the global F-35 programme.

Previous company annual reports note how Moog “provides actuators, power drive electronics, control electronics and software” for the F-35 fighter jet.

Moog was approached for comment.

TAGGED: **Israel** **Palestine**

ABOUT THE AUTHOR

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Moog

Supplies Elbit Systems Israel with military aircraft parts, used to train Israeli pilots to fly F-16 and F-35 fighter jets.
<https://www.declassifieduk.org/israeli-fighter-pilots-training-with-uk-equipment/>

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All Moog sites

Moog Aircraft Group

Wolverhampton

Valiant Way, Coven, Wolverhampton WV9 5GB

A detailed map of the Moog Aircraft Group location in Wolverhampton. The map shows the company's site marked with a red dot on Valiant Way. Surrounding areas include Eurofins, ERA Home Security, and ISP. The map also shows the River Sever, Wobaston Road, and various local landmarks like Fordhouses Cricket Club and Black Country Millennium Forest. The map is sourced from Leaflet and OpenStreetMap.

<https://www.facebook.com/sharer/sharer.php?u=https%3A%2F%2Ftargetmap.org%2F%2Fcompany%2F242>

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targetmap.org/sites/970

☆

Moog Aircraft Group

Location information

Valiant Way, Coven, Wolverhampton WV9 5GB

Target this site

READ THE ACTION GUIDE

About the site

Supplies Elbit Systems Israel with military aircraft parts, used to train Israeli pilots to fly F-16 and F-35 fighter jets.

About the owner of this site

Click on the company to see more of their sites

Moog

Supplies Elbit Systems Israel with military aircraft parts, used to train Israeli pilots to fly F-16 and F-35 fighter jets.
https://www.declassifieduk.org/israeli-fighter-pilots-training-with-uk-equipment/

Military Hardware

2 sites

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The map displays the Moog Aircraft Group site, marked with a red dot, situated on Valiant Way. The site is surrounded by various industrial and commercial buildings, including Eurofins, ERA Home Security, and ISP. The map also shows the JLR Module, IS4 Business Park Substation, and the Fordhouses Cricket Club. The area is bordered by Wobaston Road and Innovation Drive. The map is powered by Leaflet and OpenStreetMap contributors.

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