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Elwira Kelly
Claimant
Sixth Statement
3 November 2026
Exhibit "EK6"

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

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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

SIXTH 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 five 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**"), the fourth dated 28 July 2026 ("**Kelly 4**"), and the fifth dated 2 October 2026 ("**Kelly 5**"). For the avoidance of doubt, capitalised terms in this statement continue to adopt the definitions in Kelly 1 unless otherwise stated.

2. In accordance with paragraph 7 of the Injunction Order, I make this statement to provide further evidence in support of Moog's application dated 28 July 2026 for the Injunction Order to be reviewed (the "**Review Application**") prior to the Review Hearing, which is listed in a three-day window from 18 November 2026, and to update the court as to the steps Moog has taken to notify the Defendants of the proceedings and to serve the proceedings on the Named Defendants.

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3. In addition to the Review Application, the Claimants have made the following applications (the **"Applications"**):

   (a) to 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"**), and amend the Particulars of Claim and the Claim Form in these proceedings to add the Named Defendants to the proceedings on 2 October 2026 (the "**Joinder Application"**). The Claimants have applied for the Joinder Application to be heard at the Review Hearing; and

   (b) to serve the Joinder Application, the Review Application, and other documents in the claim on the Named Defendants by an alternative method or at any alternative place on 28 July 2026 (the "**Alternative Means Application**"). The Alternative Means Application was granted by way of an order of Master McQuail dated 3 September 2026, a copy of which is exhibited at (pp. 1-11) (the **"Alternative Means Order"**).

4. The reasons Moog has made the Applications and applied for continuation of the relief granted by the Injunction Order, as well as the steps Moog has taken to notify potential Defendants of the existence of the Injunction Order, are addressed in Kelly 4 and Kelly 5.

NOTIFICATION AND SERVICE

5. I set out below details of:

   (a) The means by which the documents in these proceedings have been served on the Named Defendants pursuant to the Alternative Means Order;

   (b) The further correspondence between the Claimants and the Named Defendants; and

   (c) The means by which the Applications were notified to the Defendants (being 'Persons Unknown') pursuant to the Injunction Order.

Service of documents in these proceedings on the Named Defendants

6. Pursuant to the Alternative Means Order, the court granted Moog permission to serve the Joinder Application, the Review Application (and all evidence in support of this), together with the Alternative Means Application, the Alternative Means Order, Kelly 4, and all other documents previously filed by Moog in these proceedings, on the Named Defendants by taking the steps set out in paragraphs 1(i) to (iii) (alternatively, paragraphs 1(iv) or (v), as applicable) of the Alternative Means Order (pp. 3-4).

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7. Further, paragraph 2 of the Alternative Means Order made provision for deemed service of the documents referred to at paragraph 6 above on the Named Defendants (p. 4).

8. Details of the steps Moog has taken to comply with these requirements are as follows. Paragraph numbers below refer to the relevant paragraphs in the Alternative Means Order:

   (a) Posting a copy of those documents together with a covering letter by way of first-class post to the addresses contained in Schedule 1 of the Alternative Means Order (paragraph 1(i))

      (i) An index listing the documents posted to the Named Defendants is exhibited at (pp. 12-15). As required by paragraph 1(i) of the Alternative Means Order, these included a covering letter, copies of which are exhibited at (pp. 16-27).

      (ii) **Bea (Frank) Sherman**: the documents were posted by Royal Mail Special Delivery to Bea Sherman's address (as listed in Schedule 1 of the Alternative Means Order) on 13 October 2026 (pp. 28-30). They were confirmed delivered on 14 October 2026.

      (iii) **Iain Evans**: the documents were posted by Royal Mail Special Delivery to Iain Evans' address (as listed in Schedule 1 of the Alternative Means Order) on 13 October 2026 (pp. 31-33). They were confirmed delivered on 15 October 2026.

      (iv) **Hisham Alkhamesi**: the documents were posted by Royal Mail Special Delivery to Hisham Alkhamesi's address (as listed in Schedule 1 of the Alternative Means Order) on 13 October 2026 (pp. 34-36). They were confirmed delivered on 14 October 2026.

      (v) **Hanah Yun Stevens**: the documents were posted by Royal Mail Special Delivery to Hanah Yun Stevens' address (as listed in Schedule 1 of the Alternative Means Order) on 13 October 2026 (pp. 37-39). Royal Mail attempted delivery of the documents by Special Delivery on 14 October 2026 and again on 15 October 2026, however there was no answer at the address listed in Schedule 1 of the Alternative Means Order. I understand from Royal Mail's tracking information that the documents are currently being held at a London Delivery Office near to the Named Defendant, and the Named Defendant has been left a "Something for you card" informing them that a redelivery can be booked (p. 37). Moog has also prepared a letter reiterating to the Named Defendant that the Named Defendant is included in the Joinder Application and the bundle containing the documents in the proceedings can be redelivered or collected (pp. 40-41). This letter

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will be sent to the Named Defendant by post when Moog serves this additional evidence in support of the Review Application in accordance with paragraph 2 of the Alternative Means Order.

(b) Hand delivery

(i) Whilst not strictly required by the terms of the Alternative Means Order, Moog also arranged for the bundle of documents and covering letter to be hand delivered to each of the Named Defendants at the addresses listed in Schedule 1 of the Alternative Means Order via process servers. This was intended to increase the likelihood that the proceedings were brought to the attention of the Named Defendants.

(ii) The process servers reported the following to Moog:

(1) **Bea (Frank) Sherman**: having had no answer, the process server left the documents by the Named Defendant's front door on 14 October 2026 (pp. 42-44).

(2) **Iain Evans**: the documents were handed to the Named Defendant on 15 October 2026 (p. 45).

(3) **Hisham Alkhamesi**: having had no answer, the process server left the documents by the Named Defendant's back door on 14 October 2026 (pp. 46-49).

(4) **Hanah Yun Stevens**: having had no answer on 14 October 2026, and there being no secure place to leave the bundle of documents, the documents were returned to Moog's solicitors undelivered (p. 50).

(c) Uploading a copy of those documents (omitting Schedule 1 of the Alternative Means Order) to the Injunction Website (paragraph 1(ii))

(i) All copies of the documents have been uploaded and can be accessed on the Injunction Website.

(ii) I enclose at (pp. 51-52) a screenshot taken of the Injunction Website on 27 October 2026, showing the documents available on the site. Having spoken with Moog's Marketing Technology Manager, I understand that these documents were first uploaded to the Injunction Website on 13 October 2026. The Injunction Website has been advertised via QR codes on the warning notices (per the Injunction Order) and Signs (as defined in the Alternative Means Order) erected around the Sites (pp. 53-57). The

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covering letters sent to the Named Defendants also referred to the Injunction Website.

(d) Placing signs at prominent locations on the perimeter of the Sites which advises that the Joinder Application and the Review Application have been made and which provide a weblink and QR code by which the Injunction Website can be accessed (paragraph 1(iii))

(i) Having spoken with my colleagues who manage each of the Sites, they have confirmed that the Signs (as defined at paragraph 1(iii) of the Alternative Means Order) have been erected at the Prominent Locations (as defined at paragraph 14 of the Injunction Order) at each Site.

(ii) A copy of the Signs is exhibited at (pp. 53-57). The Signs also note that any further documents filed by Moog ahead of the Review Hearing can be found at the Injunction Website or obtained by emailing Moog's dedicated inbox.

(iii) With regards to each Site:

(1) **Wolverhampton Site**: Signs were placed at the Prominent Locations on 13 October 2026 (pp. 58-75).

(2) **Tewkesbury (Industrial) Site**: Signs were placed at the Prominent Locations on 15 October 2026 (pp. 76-81).

(3) **Tewkesbury (Commercial Aircraft) Site**: Signs were placed at the Prominent Locations on 15 October 2026 (pp. 82-104).

(4) **Luton Site**: Signs were placed at the Prominent Locations on 13 October 2026 (pp. 105-126).

(5) **Reading Site**: Signs were placed at the Prominent Locations on 23 October 2026 (pp. 127-136).

9. As is noted above, I understand that Moog has been unable to deliver the documents directly to Hanah Yun Stevens, either by Royal Mail or via process server. As stated in the witness statement of the process server dated 19 October 2026 (p. 50), the process server had made enquiries with neighbours and was told the address that Moog holds for Hanah Yun Stevens is operating as an Airbnb and no one was living there at that time. Having made all reasonable efforts to attempt delivery on Hanah Yun Stevens, Moog is unable to ascertain any other address at which Hanah Yun Stevens may reside and to which it can attempt further service of the documents. The additional steps that Moog has taken to bring the proceedings, including the Joinder Application, to the attention of Hanah Yun Stevens are set out at paragraph 8(a)(v) above.

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10. Paragraph 1(iv) of the Alternative Means Order provides that, alternative to the service requirements at paragraph 1(i) to (iii) in the Alternative Means Order, where requested by a Named Defendant, the documents to be served may be served by email on that Named Defendant where that Named Defendant has requested that they be served by email, by sending the email to the address provided by that Named Defendant.

11. Further in the alternative, paragraph 1(v) of the Alternative Means Order provides that service may be effected on the Named Defendants by serving any solicitor acting for a Named Defendant who has filed a notice of acting in these proceedings.

12. I am aware from colleagues that Moog's dedicated inbox has been checked daily for any correspondence received (including from the Named Defendants), and can confirm that we have not received any correspondence from the Named Defendants – or any other potential Defendant. This includes any requests that documents be sent by email to a Named Defendant or to a solicitor instructed by a Named Defendant. I also know from speaking with Moog's solicitors that there is no record of any solicitor having filed a notice of acting in these proceedings on behalf of the Named Defendants, or any potential Defendant.

Further correspondence with the Named Defendants

13. As directed by the court on the sealed Joinder Application, Moog has sought agreement from the Named Defendants that the Joinder Application will be heard at the Review Hearing on the basis that it does not increase the time estimate of the Review Hearing. Letters to each of the Named Defendants were posted on 30 October 2026 for that purpose, copies of which are exhibited at (pp. 137-143). Moog has also prepared a cover letter to accompany service of this additional evidence, and which reiterates to the Named Defendants that Moog will be asking the court to hear the Joinder Application at the Review Hearing (pp. 144-151).

14. Moog has not received a response to these to date, but will keep the court updated should it receive any replies.

Notification on the Defendants

15. Paragraph 10 of the Injunction Order requires that notification to the Defendants (being the First to Fifth defendants in the proceedings (or the 'Persons Unknown')) of any further applications shall be effected by Moog carrying out each of the following steps:

    (a) Uploading a copy of the application to the Injunction Website. As I explain above at paragraph 8(c), copies of the Applications have been uploaded to the Injunction Website; and

    (b) Affixing a notice at a Prominent Location at the relevant Site/s show edged red on Plans 1, 4 and 5 and edged yellow on Plans 2 and 3 stating that the application has

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been made and where it can be accessed in hard copy and online. As I explain above at paragraph 8(d), the Signs have been erected at the Prominent Locations at each of the Sites explaining that the Applications have been made and how to access these online and how to otherwise obtain copies.

EVENTS SINCE KELLY 5

16. I wish to update the court that there have been three suspicious incidents at the Wolverhampton Site since Kelly 5 was filed, as follows:

    (a) 4 October 2026: a car was observed driving slowly past the delivery gate. There appeared to be a camera mounted on a stand in the front passenger seat, and the driver appeared to be taking photographs / recording video footage of the delivery gate and surrounding area.

    (b) 17 October 2026: the same car appeared again and was seen driving past the delivery gate.

    (c) 30 October 2026: two men were observed walking past the visitor gate recording video footage of the Site with a mobile phone.

17. Since Kelly 5 was filed on 2 October 2026, I have been made aware from both information provided by colleagues and online publications that further incidents by direct-action groups of the kind responsible for the Incident have taken place against other companies operating within the defence sector.

18. This includes, concerningly, action directed towards individual employees of companies such as Elbit Systems and Leonardo UK. Over the past month, executives of UK defence companies have been targeted at their homes by a pro-Palestine group known as "The List" (pp. 152-156). According to online publications, The List is directing vandalism attacks at "*people they accuse of aiding the Israel Defence Forces (IDF)*", including vandalising homes and cars. They claim to have "*targeted more than half a dozen senior employees from defence firms in the UK*" and have threatened that their "*message to anyone working for companies abetting the genocide is this: you are responsible for the work that you do and the countless lives that your work takes. Quit your job, or risk a visit from The List*". The escalation of direct-action protest in this way, whilst different to the activity that Moog has experienced, has made me extremely concerned for the ongoing safety and morale of Moog employees at the Sites.

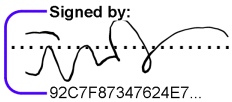
19. I am also aware from a website called the "Palestinian Solidarity Campaign" that there were protests planned on 21 October 2026 at Elbit Systems in Bristol and UAV Engines in Shenstone. The website asks for people to join them to "*[d]emand a comprehensive two-way arms embargo on Israel now*" (pp. 157-159). Support for Palestine Action continues

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notwithstanding its proscription under terrorism legislation. I know from media reporting that hundreds of arrests were made at a protest outside the US Embassy in London on 1 November 2026 (pp. 160-161).

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 

Elwira Kelly

DATED this 3rd day of November 2026.