IN THE HIGH COURT OF JUSTICE **Claim No. PT-2025-000910**

BUSINESS AND PROPERTY DIVISON

PROPERTY TRUSTS AND PROBATE LIST

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

VOLUME 1
REVIEW HEARING BUNDLE

Pagination of this bundle is in red. All other pagination is internal to that document.

Volume 2 (Hearing Bundle for the Return Hearing on 6 October 2025) can also be found here: https://www.moog.co.uk/injunction.html

Doc no.	Document	Date	Page no.
TAB A – October 2025 Injunction Order			
1	Claim Form	4 September 2025	5 – 8
2	Amended Particulars of Claim	5 September 2025	9 – 20
3	Order of Meade J	8 September 2025	21- 46
4	Order of the Honourable Mr Justice Thompsell	6 October 2025	47 – 73
5	Claimants' Note of the Hearing	6 October 2025	74 – 81
6	Amended Claim Form	22 October 2025	82 – 90
7	Re-Amended Particulars of Claim	7 October 2025	91 – 102
TAB B – Application Documents for the Review Hearing			

8	Application Notice for Listing of Review Hearing ("Review Application")	28 July 2026	103 – 141
9	Notice of Review Hearing	12 August 2026	142
TAB C – Application Documents for Service by Alternative Means			
10	Application Notice for Service by Alternative Means on the Named Defendants	28 July 2026	143 – 154
11	Order of Master McQuail (*service by alternative means*) ("Alternative Means Order")	3 September 2026	155 – 165
TAB D – Application Documents for Joinder			
12	Application Notice for Joinder of Named Defendants and Amendments to Pleadings ("Joinder Application")	2 October 2026	166 – 177
13	Draft Amended Injunction Order (adding Named Defendants)	N/A	178 – 206
14	Re-Amended Claim Form *(which the Claimants seek permission to amend per the Joinder Application)*	2 October 2026	207 – 215
15	Re-Re-Amended Particulars of Claim *(which the Claimants seek permission to amend per the Joinder Application)*	2 October 2026	216 – 227
TAB E – Witness Statements			
16	First Witness Statement of Elwira Kelly on behalf of the Claimant (Exhibit EK1 can be found at *https://www.moog.co.uk/injunction.html*)	4 September 2025	228 – 255
17	Second Witness Statement of Elwira Kelly on behalf of the Claimant (Exhibit EK2 can be found at *https://www.moog.co.uk/injunction.html*)	5 September 2025	256 – 259
18	Third Witness Statement of Elwira Kelly on behalf of the Claimant (Exhibit EK3 can be found at *https://www.moog.co.uk/injunction.html*)	1 October 2025	260 – 269
19	Fourth Witness Statement of Elwira Kelly on behalf of the Claimant (enclosing Exhibit EK4)	28 July 2026	270 – 314

20	Fifth Witness Statement of Elwira Kelly on behalf of the Claimant (enclosing Exhibit EK5)	2 October 2026	315 – 492
21	Sixth Witness Statement of Elwira Kelly on behalf of the Claimant (enclosing Exhibit EK6)	3 November 2026	493 – 663
TAB F – Correspondence with Named Defendants			
22	Letters to Named Defendants serving Joinder Application (and related documents), Review Application (and related documents), Alternative Means Order (and related documents), and all other documents previously filed in these proceedings	13 October 2026	664 – 675
23	Letters to Named Defendants on agreement to listing of Joinder Application at Review Hearing	30 October 2026	676 – 682
24	Letter to Hanah Yun Stevens on service of documents	4 November 2026	683 – 684
25	Letters to Named Defendants serving Kelly 6, EK6, and the draft amended injunction order	4 November 2026	685 – 692
26	Letters to Named Defendants regarding Review Hearing bundle	11 November 2026	693 – 724
TAB G – Certificates of Service			
27	Certificate of Service (Kelly 6, EK6, and the draft amended injunction order)	6 November 2026	725 – 734

Docusign Envelope ID: 61EB72FE-75F5-4F81-88DE-A2DF48792418

Claim Form (CPR Part 8)

In the	High Court of Justice Chancery Division
Claim no.	
Fee Account no.	
Help with Fees - Ref no. (if applicable)	H W F – –

HIGH COURT OF JUSTICE
THE BUSINESS & PROPERTY COURTS OF ENGLAND & WALES
04 Sep 2025

PT-2025-000910

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

SEAL

Defendant(s)
Persons Unknown (See Schedule 1)

Does your claim include any issues under the Human Rights Act 1998? ☐ Yes ☑ No

Details of claim (see also overleaf)

See attached Particulars of Claim.

Defendant's name and address

See Schedule 1

	£
Court fee	646
Legal representative's costs	
Issue date	4 September 2025

For further details of the courts www.gov.uk/find-court-tribunal.
When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

© Crown copyright 2020

Docusign Envelope ID: 61EB72FE-75F5-4F81-88DE-A2DF48792418

Claim no.	

Details of claim (continued)

See attached Particulars of Claim.

Moog Wolverhampton Limited
Valiant Way
Wolverhampton
West Midlands
United Kingdom WV9 5GB

MoogLegal@moog.com

Claimant's or claimant's legal representative's address to which documents should be sent if different from overleaf. If you are prepared to accept service by DX, fax or e-mail, please add details.

Docusign Envelope ID: 61EB72FE-75F5-4F81-88DE-A2DF48792418

Statement of Truth

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.

☐ **I believe** that the facts stated in these particulars of claim are true.

☑ **The Claimant believes** that the facts stated in these particulars of claim are true. **I am authorised** by the claimant to sign this statement.

Signature

Signed by:
Elwira Kelly
92C7F87347624E7...

☑ Claimant

☐ Litigation friend (where claimant is a child or a Protected Party)

☐ Claimant's legal representative (as defined by CPR 2.3(1))

Date

Day	Month	Year
04	09	2025

Full name

Elwira Kelly

Name of claimant'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

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

Docusign Envelope ID: 61EB72FE-75F5-4F81-88DE-A2DF48792418

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 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 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 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

Docusign Envelope ID: 2572B2A1-1464-4693-9547-D74B64EAF3DB

IN THE HIGH COURT OF JUSTICE **Claim No:**

CHANCERY DIVISION

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

Docusign Envelope ID: 2572B2A1-1464-4693-9547-D74B64EAF3DB

(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 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 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

AMENDED PARTICULARS OF CLAIM UNDER CPR r.17.1(1)

DATED 5 SEPTEMBER 2025

THE CLAIMANTS

1. The Claimants are UK subsidiaries of Moog Inc, an American based company which designs and manufactures controls and systems for aerospace, defence, industrial, and medical applications. Companies within the Moog Inc group, including the Claimants, hold contracts with various military aircraft end users (amongst other clients).

THE LAND TO WHICH THE CLAIM RELATES

2. The First Claimant is the freehold owner of the site known as Moog Aircraft Group Wolverhampton, Valiant Way, Pendeford, Wolverhampton, WV9 5GB, title to which is registered at HM Land Registry under title numbers SF470338, SF498970, SF606388 and SF694209 ("the Wolverhampton Land"). The part of the Wolverhampton Land over which Moog seeks this injunction consists of the land shown edged red on Plan 1 annexed to these Particulars of Claim (the "Wolverhampton Site").

Docusign Envelope ID: 2572B2A1-1464-4693-9547-D74B64EAF3DB

3. The Wolverhampton Site comprises a large industrial building with parking and circulation space enclosed by security fencing. The site is used for the manufacture of primary and secondary flight control actuators for military and commercial end use.

4. The airspace above the building is subject to a lease between the First Claimant and Centrica Business Solutions (Generation) Limited ("Centrica") dated 1 May 2024 by which Centrica is granted rights to (inter alia) install and maintain solar panels on the roof of the building, together with associated rights of access for the purpose of exercising its rights under the lease ("the Airspace Lease"). The premises demised to Centrica do not include the roof of the building itself.

5. The Second Claimant is the registered leasehold proprietor of the site known as Moog Controls Ltd Luton, Units C and J Airport Executive Park, President Way, Luton, LU2 9NY ("the Luton Site").

6. The Luton Site comprises two units on the Airport Executive Park, being Units C and J (the "Units"), separated by a strip of land which is retained by the freehold owner but over which the Second Claimant enjoys rights of access in common with the landlord. The Units are primarily accessed via a car park to the south of Unit C which comprises a number of parking spaces in which the Second Claimant is granted the right to park under Schedule 2 of the Unit C Lease. Other parking spaces and loading areas located to the east of Unit C and to the west and north of Unit J are also used in connection with the Units. The Second Claimant's title to Units C and J are registered at HM Land Registry under title numbers BD154446 and BD154447.

7. The Luton Site is shown edged yellow on Plan 2 annexed to these Particulars of Claim. The areas demised to the Second Claimant are shown hatched red. The strip separating Units C and J, ~~and~~ the car park and loading area to the south and east of Unit C, and the car park and loading area to the west and north of Unit J is shown shaded and hatched blue.

8. The Luton Site manufactures Foreign Object Debris detection systems that are used for airfield management purposes.

Docusign Envelope ID: 2572B2A1-1464-4693-9547-D74B64EAF3DB

9. The Third Claimant is the registered leasehold owner of the site known as Moog Reading Limited, 30 Suttons Business Park, Reading, Berkshire, RG6 1AW ("the Reading Site"). The Reading Site comprises two conjoined warehouse units, units 29 and 30 together with parking spaces. Title to the demised premises is registered at HM Land Registry under title numbers BK501720 and BK501808.

10. The warehouse units are separated from the demised car parking to the north of the units by an estate road and circulation spaces/forecourt and from the demised car parking to the south of the units by an estate road. Those areas are not demised to the Third Claimant but are common parts of the Business Park over which the Third Claimant enjoys rights in connection with the permitted user of the demised premises and in common with others. The Reading Site is shown edged yellow on Plan 3 annexed to these Particulars of Claim. The areas demised to the Third Claimant are shown hatched red. The common parts over which the Third Claimant enjoys rights in connection with the use of the demised premises are shown shaded and hatched blue.

11. The Reading Site is used for the manufacture of slip rings, motor controls and fibre optic components.

12. The Fourth Claimant is the leasehold owner of the site known as Moog Aircraft Group Tewkesbury, Ashchurch, Tewkesbury, Gloucestershire, GL20 8NA, the title to which is registered at HM Land Registry under title number GR476429 ("the Tewkesbury Aircraft Site"). The Tewkesbury Aircraft Site is shown edged red on Plan 4 annexed to these Particulars of Claim.

13. The Tewkesbury Aircraft Site comprises a large building, with both warehouse and office premises, together with car parking and circulation space. It is enclosed by security fencing. The site is used for the manufacture of electro-hydraulic servo valves and braking and steering control manifolds.

14. The Fourth Claimant is also the leasehold owner of the site known as Moog Industrial Group, Ashchurch Parkway, Tewkesbury, Gloucestershire, GL20 8TU, title to which is registered at HM Land Registry under title number GR395822 ("the Tewkesbury Industrial Site"). The Tewkesbury Industrial Site is shown edged red on Plan 5 annexed to these Particulars of Claim.

Docusign Envelope ID: 2572B2A1-1464-4693-9547-D74B64EAF3DB

15. The Tewkesbury Industrial Site comprises a building with office and factory use with parking and circulation spaces. The site is used for the manufacture of servovalves, actuators and control system manifold assemblies for a variety of industrial end markets.

16. In these Particulars of Claim, the Wolverhampton Site, the Luton Site, the Reading Site, the Tewkesbury Aircraft Site and the Tewkesbury Industrial Site are referred to collectively as "the Moog Sites" where appropriate.

17. The claim is not for injunctive or other relief in relation to any residential property.

THE THREAT

18. Palestine Action is a pro-Palestine direct action protest group which describes its aims as being "to take direct action against Israel's arms trade in Britain[1]" and to target property and premises belonging to corporate actors seen as aiding and abetting violations of international law by Israel against the Palestinian people. It is a proscribed organisation under the Terrorism Act 2000 ("the Act") with effect from 5th July 2025.

19. Palestine Action or individuals associated with, or espousing causes similar to those of Palestine Action, have undertaken unlawful direct action against a number of companies who are alleged to have supplied aircraft parts or equipment for ultimate use by Israel and/or the Israel Defense Forces ("the IDF") as an end user.

20. In particular, a website entitled "Declassified UK" has in the past published articles naming companies with operational sites situated in the UK which are alleged to supply components to the IDF. In relation to the following companies, such publication has been associated with such unlawful direct action being taken soon afterwards against operational sites of the companies in question:

    (i) BAE Systems Plc;
    (ii) Martin-Baker Limited;
    (iii) UAV Engines Limited;

[1] Ammori v Secretary of State for the Home Department [2025] EWHC 1708 at 8.

Docusign Envelope ID: 2572B2A1-1464-4693-9547-D74B64EAF3DB

(iv) Instro Precision Limited; and

(v) Permoid Industries Limited.

21. On 10 July 2025, the Declassified UK website published an article under the headline "Israeli fighter pilots training with UK equipment", including, but not limited to, allegations that:

(i) "Moog" had designed the flight control system for the "M-346 Lavi", which was described as "a high-performance aircraft designed to train Israeli pilots to fly advanced fighter jets including the F-16 and F-35" and provides maintenance services for the aircraft;

(ii) F-16 fighter jets had been used by Israeli forces last year "to bomb a residential compound in Gaza housing UK charity Medical Aid for Palestinians, injuring four British doctors" and that "F-35s have also been used to commit war crimes in Gaza, including an airstrike on a designated safe zone which killed 90 people";

(iii) "In addition to supplying parts for the M-346 Lavi, Moog has contributed to the global F-35 programme";

(iv) "Moog has sent at least ten shipments to Hatzerim airbase since December 2024"; and

(v) Specifically, the First Claimant had "sent at least ten shipments to Israel's Hatzerim airbase since December", and "was on the most recent list of UK-based companies which have received arms export licences for the international F-35 programme."

22. The First Claimant is also identified on the Campaign Against Arms Trade ("CAAT") website as a company which makes components for F-35s and as a company which holds an "Israeli military export licence". A search for "Moog" on the CAAT website identifies the addresses of two of the Moog Sites.

Docusign Envelope ID: 2572B2A1-1464-4693-9547-D74B64EAF3DB

23. In the early hours of Tuesday 26th August 2025, four individuals claiming to be associated with a group called "Palestinian Martyrs for Justice" broke into the Wolverhampton Site by ramming a vehicle into the front gates and then driving through an internal automatic barrier into the Logistics Entrance to the site. Thereafter, they climbed onto the roof of the main building, causing significant damage to the building and solar panels installed upon its roof and considerable disruption to the First Claimant's business operations.

24. By reason of the foregoing facts and matters, some or all of the Moog Sites are highly likely to be the subject of unlawful direct action; and, further or alternatively, the Claimants reasonably so apprehend.

CAUSES OF ACTION

25. The Claimants apprehend that, unless restrained by the Court, persons unknown having sympathies for causes similar to those espoused by (among others) Palestine Action will conduct themselves in such a way as to amount to trespass and/or nuisance at one or more or all of the Moog Sites.

26. Members of the public have no consent or permission to enter upon the Moog Sites. The Claimants have not given any permission, consent or licence to any person to enter onto the Moog Sites other than in connection with the lawful operation of those sites and, in respect of the Wolverhampton Site, for the exercise of the rights to Centrica under the Airspace Lease. In particular, the Claimants have not given any permission, consent or licence to members of the public to enter onto the Moog Sites for the purpose of protest, direct action or other protest activity whether associated with the causes espoused by (among others) Palestine Action or otherwise.

27. Accordingly:

    (i) entry onto, occupation of, or remaining on the Moog Sites, or any of them; or

Docusign Envelope ID: 2572B2A1-1464-4693-9547-D74B64EAF3DB

(ii) climbing, 'locking on' (by whatever means) to any part thereof, causing damage such as by smashing of windows or external equipment, spray-painting, pouring, depositing, throwing or affixing anything; or

(iii) in respect of the Wolverhampton Site and the Tewkesbury Aircraft Site (which are enclosed by their own fences) the climbing, cutting or spray-painting of, the "locking on" to (by whatever means) or pouring, depositing, throwing, or affixing anything to the fencing surrounding those sites,

would therefore constitute a trespass, which the Claimants are entitled to injunctive relief to restrain.

28. Further, the Claimants seek injunctive relief to restrain:

(i) The obstruction or interference, or attempted obstruction or interference, of access to or egress from the Moog Sites, with or without vehicles, by the Claimants, their agents, employees, contractors, customers, suppliers or other licensees; and

(ii) the interference with any of the services serving the Moog Sites, including but not limited to water and/or sewerage pipes.

Any such interference would constitute a trespass, alternatively a nuisance and the relief sought is necessary and proportionate in order to give effective protection to the Claimants' rights as landowners in respect of the Moog Sites.

29. The Second Claimant also seeks injunctive relief in respect of the area shown shaded and hatched blue on Plan 2, being (i) the strip of land separating the Units and (ii) ~~the car parking spaces and loading bays adjoining Unit C which is used with to access~~ parking areas and loading bays used with the Units. It is not asserted in these proceedings that the Second Claimant is the person entitled to sufficient possession or control of those areas to maintain a cause of action in trespass in relation thereto. However:

Docusign Envelope ID: 2572B2A1-1464-4693-9547-D74B64EAF3DB

(i) the relief claimed in relation the areas shown shaded and hatched blue on Plan 2 is no more than is necessary and proportionate in order to give effective protection to its rights as landowner to restrain trespass on the Luton Site;

(ii) further or alternatively, such relief is required in order to restrain acts of nuisance, or threatened nuisance, within the areas shaded and hatched blue which would interfere with the Second Claimant's use and enjoyment of the Luton Site or which would threaten to do so.

30. On the like basis, the Third Claimant also seeks injunctive relief in respect of the areas shown shaded and hatched blue on Plan 3, being the estate road and/or circulation spaces/forecourt/additional car parking spaces separating the warehouse units from the demised car parking spaces within the Reading Site.

HUMAN RIGHTS

31. Reliance by the Defendants of rights of freedom of expression and / assembly under Articles 10 and/or 11 of the European Convention of Human Rights would not provide a defence in the particular circumstances of this case.

THE RELIEF SOUGHT

32. The Claimants therefore seek~~s~~ the following Orders:

(i) An order restraining the First Defendants from:

(1) entering, occupying or remaining upon or damaging the land and premises shown edged red on Plan 1 being the Wolverhampton Site 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);

Docusign Envelope ID: 2572B2A1-1464-4693-9547-D74B64EAF3DB

(2) obstructing or interfering with or attempting to obstruct or interfere with access to or egress from the Wolverhampton Site, with or without vehicles, by the First Claimant, its agents, employees, contractors, customers, suppliers, or other licencees.

(ii) An order restraining the Second Defendants from:

(1) entering, occupying or remaining upon or damaging the land and premises shown edged yellow on Plan 2 being the Luton Site (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);

(2) obstructing or interfering with or attempting to obstruct or interfere with access to or egress from the Luton Site, with or without vehicles, by the Second Claimant, its agents, employees, contractors, customers, suppliers or other licencees.

(iii) An order restraining the Third Defendants from:

(1) entering, occupying or remaining upon or damaging the land and premises shown edged yellow on Plan 3 being the Reading Site (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);

(2) obstructing or interfering with or attempting to obstruct or interfere with access to or egress from the Reading Site, with or without vehicles, by the Third Claimant, its agents, employees, contractors, customers, suppliers or other licencees.

Docusign Envelope ID: 2572B2A1-1464-4693-9547-D74B64EAF3DB

(iv) An order restraining the Fourth Defendants from:

(1) entering, occupying or remaining upon or damaging the land and premises shown edged red on Plan 4 being the Tewkesbury Aircraft Site 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);

(2) obstructing or interfering with or attempting to obstruct or interfere with access to or egress from the Tewkesbury Aircraft Site, with or without vehicles, by the Fourth Claimant, its agents, employees, contractors, customers, suppliers or other licencees.

(v) An order restraining the Fifth Defendants from:

(1) entering, occupying or remaining upon or damaging the land and premises shown edged red on Plan 5 being the Tewkesbury Industrial Site (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);

(2) obstructing or interfering with or attempting to obstruct or interfere with access to or egress from the Tewkesbury Industrial Site, with or without vehicles, by the Fourth Claimant, its agents, employees, contractors, customers, suppliers or other licencees.

(vi) An order restraining the Defendants from interfering or attempting to interfere with services serving the Moog Sites including, but not limited to, water and/or sewerage pipes;

Docusign Envelope ID: 2572B2A1-1464-4693-9547-D74B64EAF3DB

(vii) Further or other relief as the Court sees fit; and

(viii) Costs.

I believe that the facts stated in this Amended Particulars of Claim 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 by:
Elwira Kelly
92C7F87347624E7...

Signed .....

Elwira Kelly

DATED this 5 day of September 2025.



IN THE HIGH COURT OF JUSTICE **Claim No: PT-2025-000910**

CHANCERY DIVISION

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 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 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

Plan 1



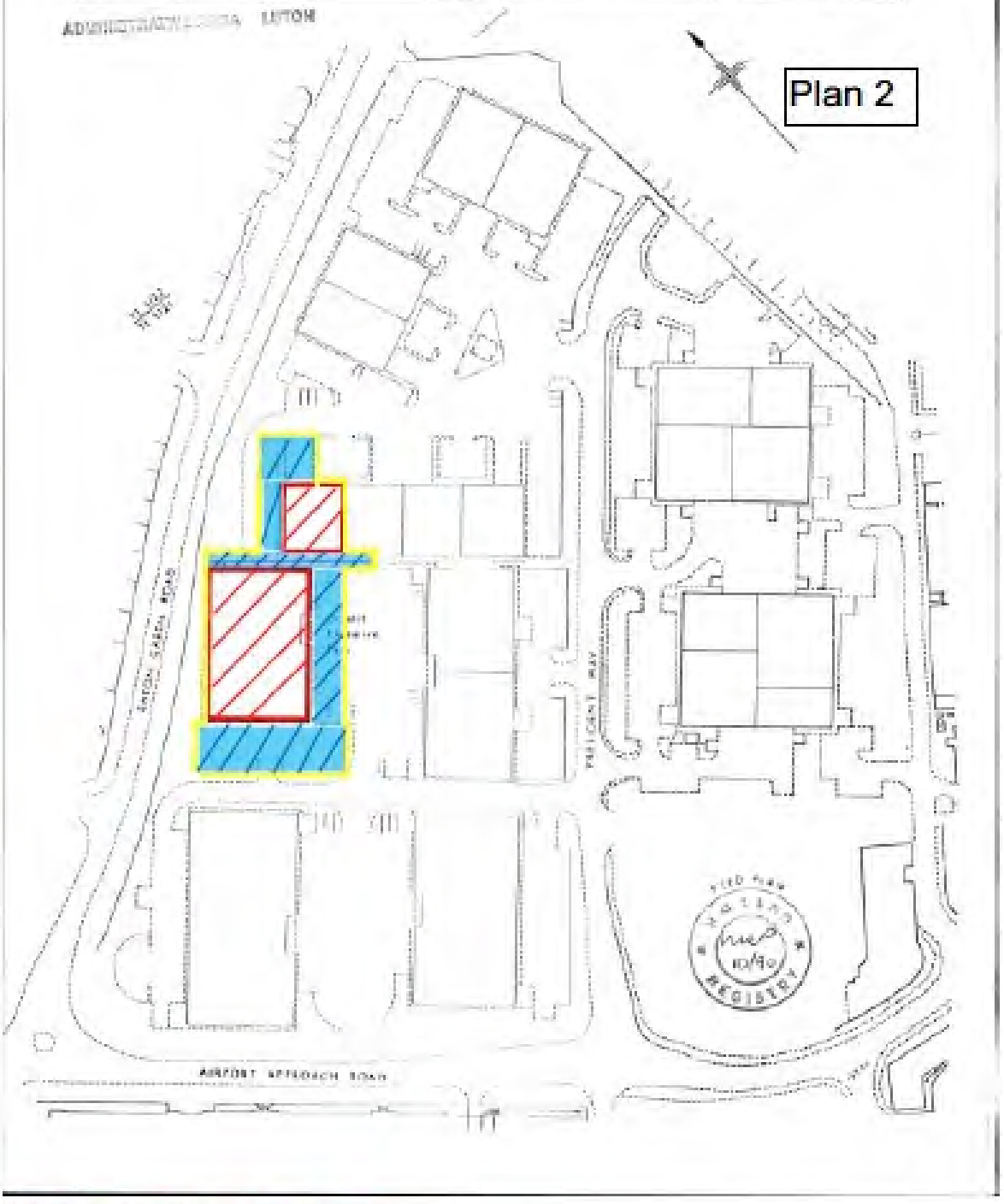
Case Reference: 1H5451.000327 updated plan

M O O G
Valiant Way
Wolverhampton
WV9 5GB

©Crown copyright and database rights 2025. OS AC0000850529
Ordnance Survey
Licensed Data

H.M. LAND REGISTRY		TITLE NUMBER BD154447	
ORDNANCE SURVEY PLAN REFERENCE	TL 1121	SECTION C	Scale 1/1250
[illegible]	[illegible]		© Crown copyright

Plan 2



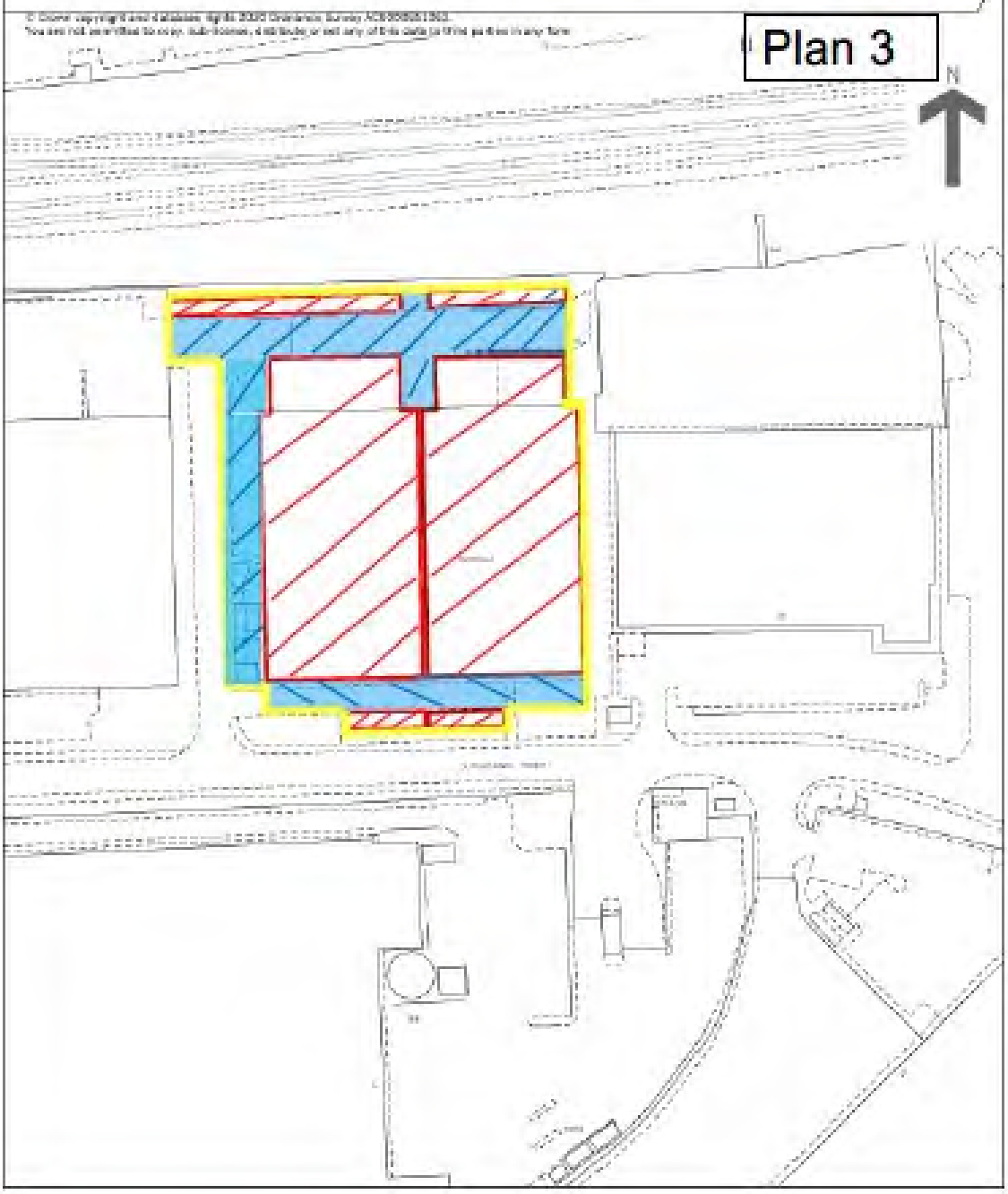
This official copy is incomplete without the preceding notes page.

HM Land Registry
Official copy of
title plan

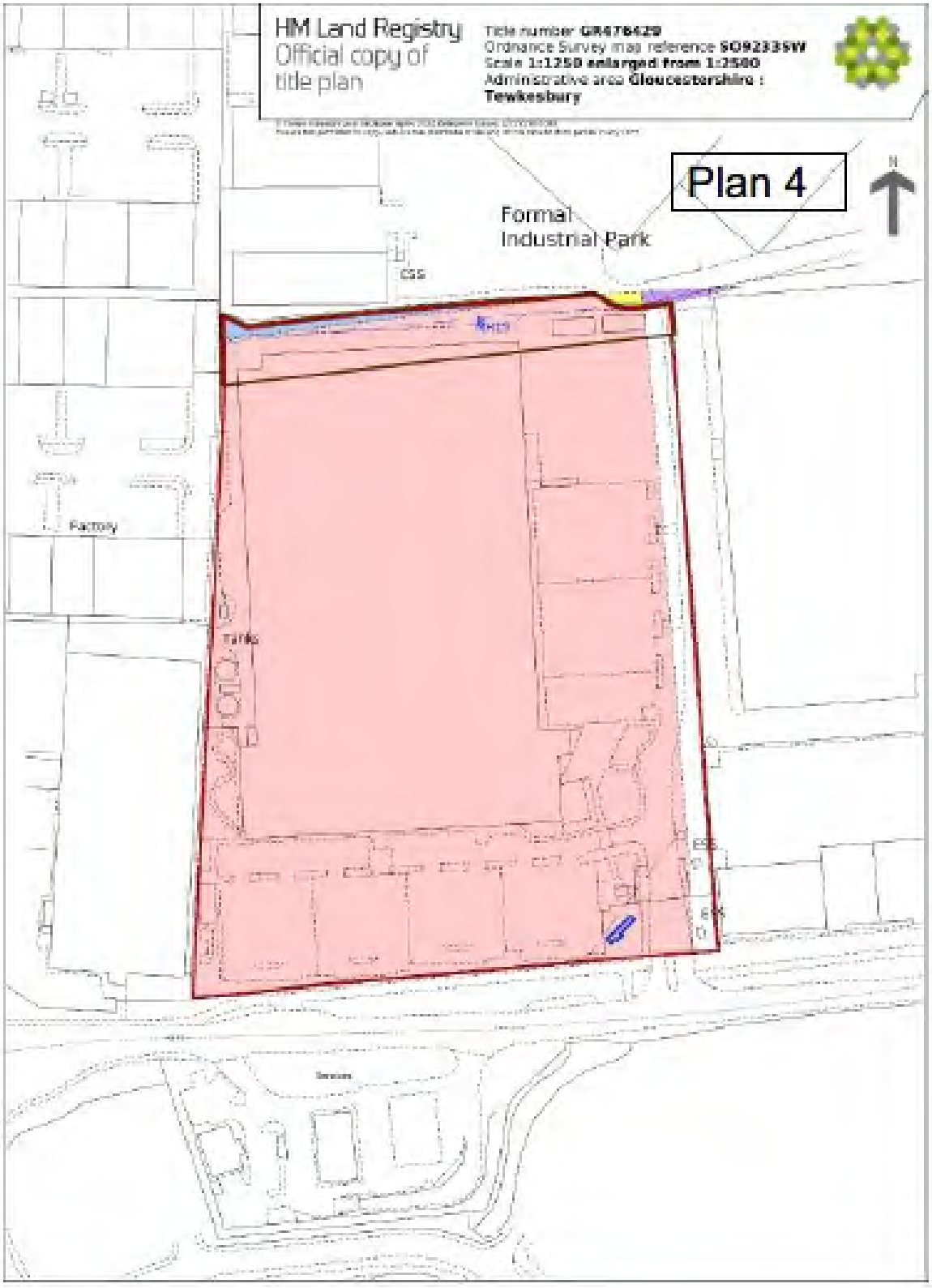
Title number **BK501808**
Ordnance Survey map reference **SU7473NW**
Scale **1:1250**
Administrative area **Wokingham**

© Crown copyright and database rights 2020 Ordnance Survey 100026316.
You may not copy, sub-license, distribute or sell any of this data to third parties in any form.

Plan 3



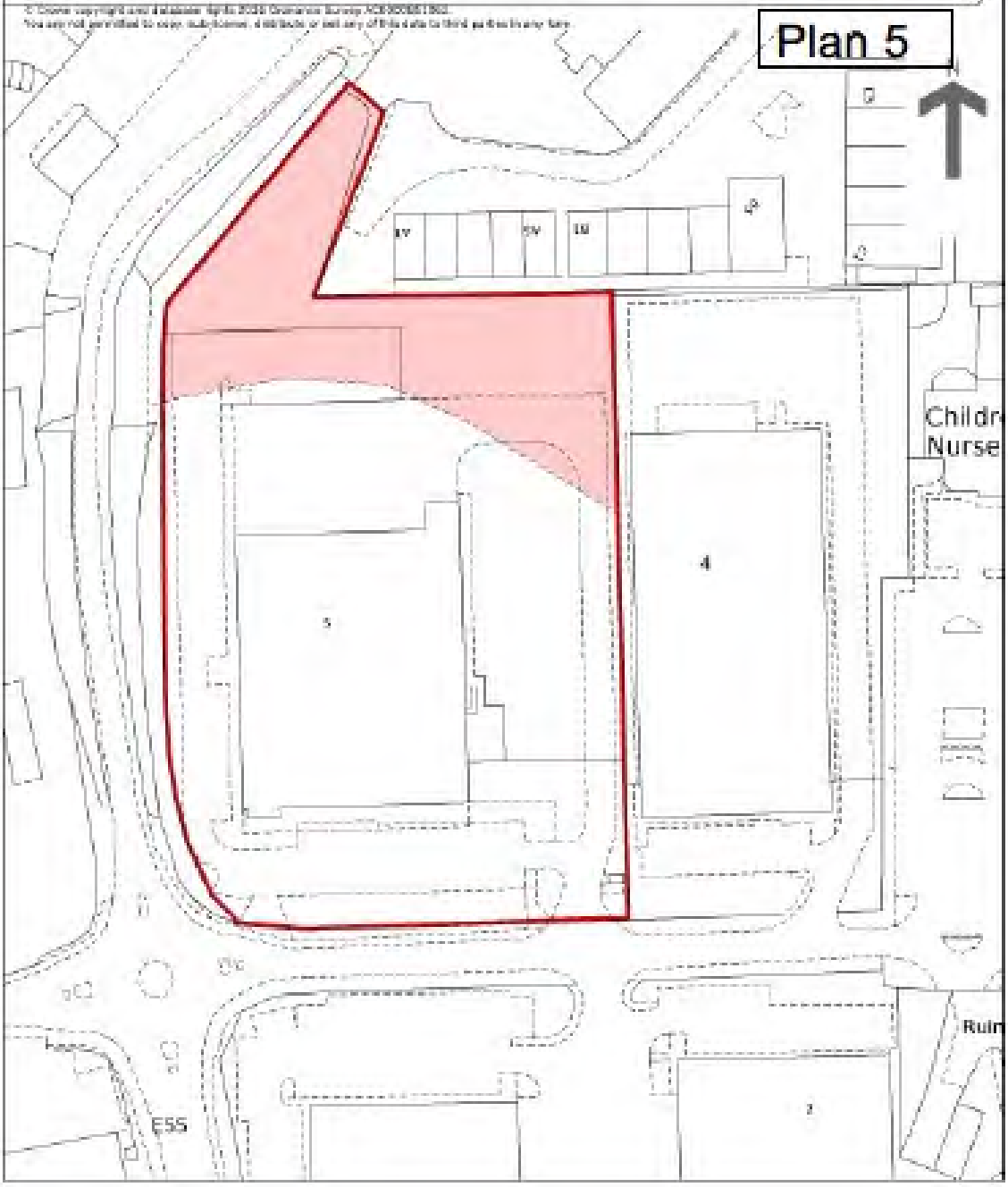
This official copy is incomplete without the preceding notes page.



This official copy is incomplete without the preceding notes page.

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



This official copy is incomplete without the preceding notes page.

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 EGDED 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.

Plan 1



Case Reference: 1H5451.000327 updated plan

M O O G
Valiant Way
Wolverhampton
WV9 5GB

©Crown copyright and database rights 2025. OS AC0000850529

Ordnance Survey
Licensed Data

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 EGDED 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

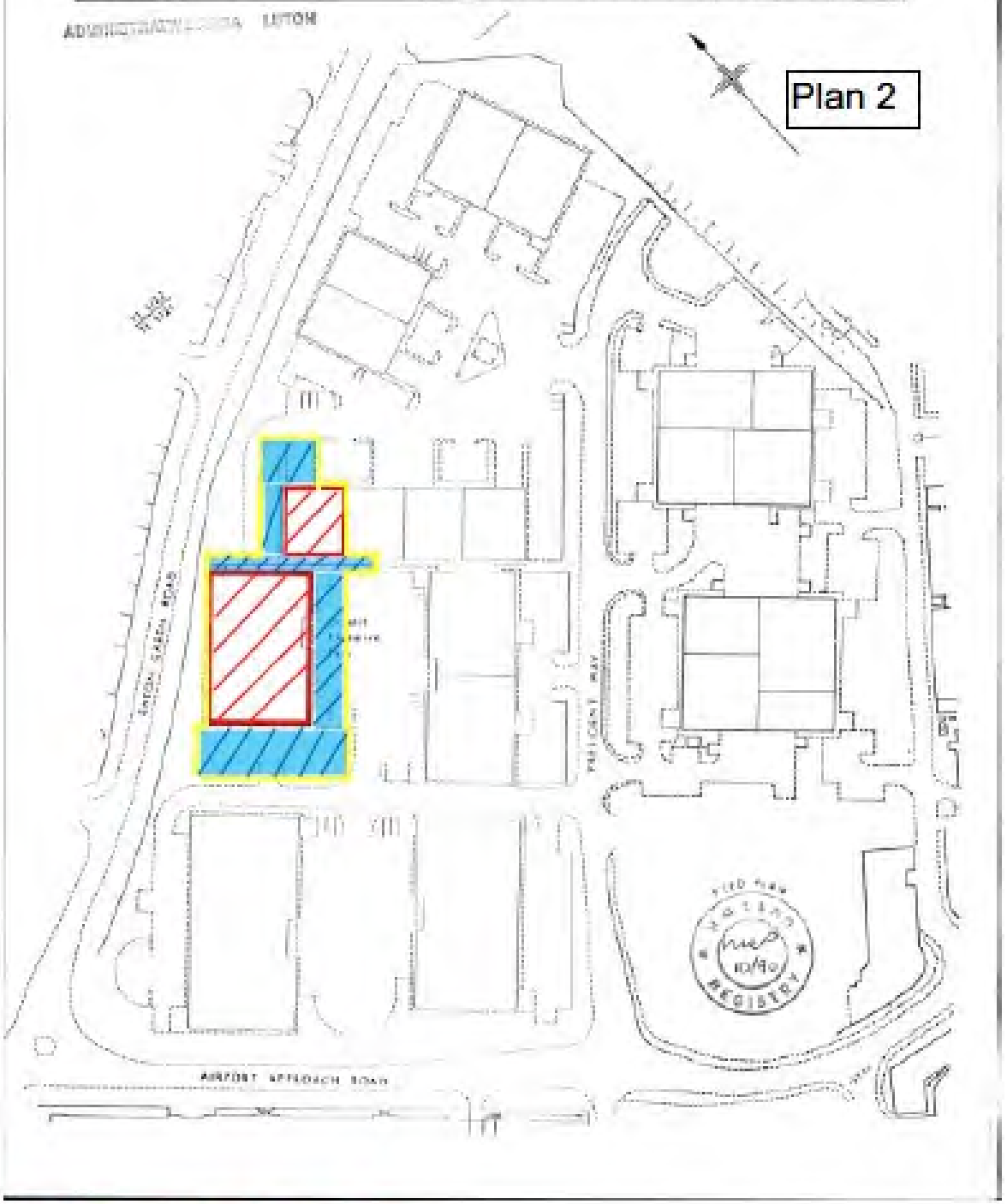
A copy of the Order and the legal proceedings to which it relates can be viewed at www.moog.co.uk/injunction or obtained by e-mailing mooglegal@moog.com

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.

H.M. LAND REGISTRY		TITLE NUMBER BD154447	
ORDNANCE SURVEY PLAN REFERENCE	TL 1121	SECTION C	Scale 1/250
~~ORDNANCE RESPONSIBILITY~~	~~DISTRICT LUTON~~		© Crown copyright

ADMINISTRATIVE AREA LUTON

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 EGDED 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

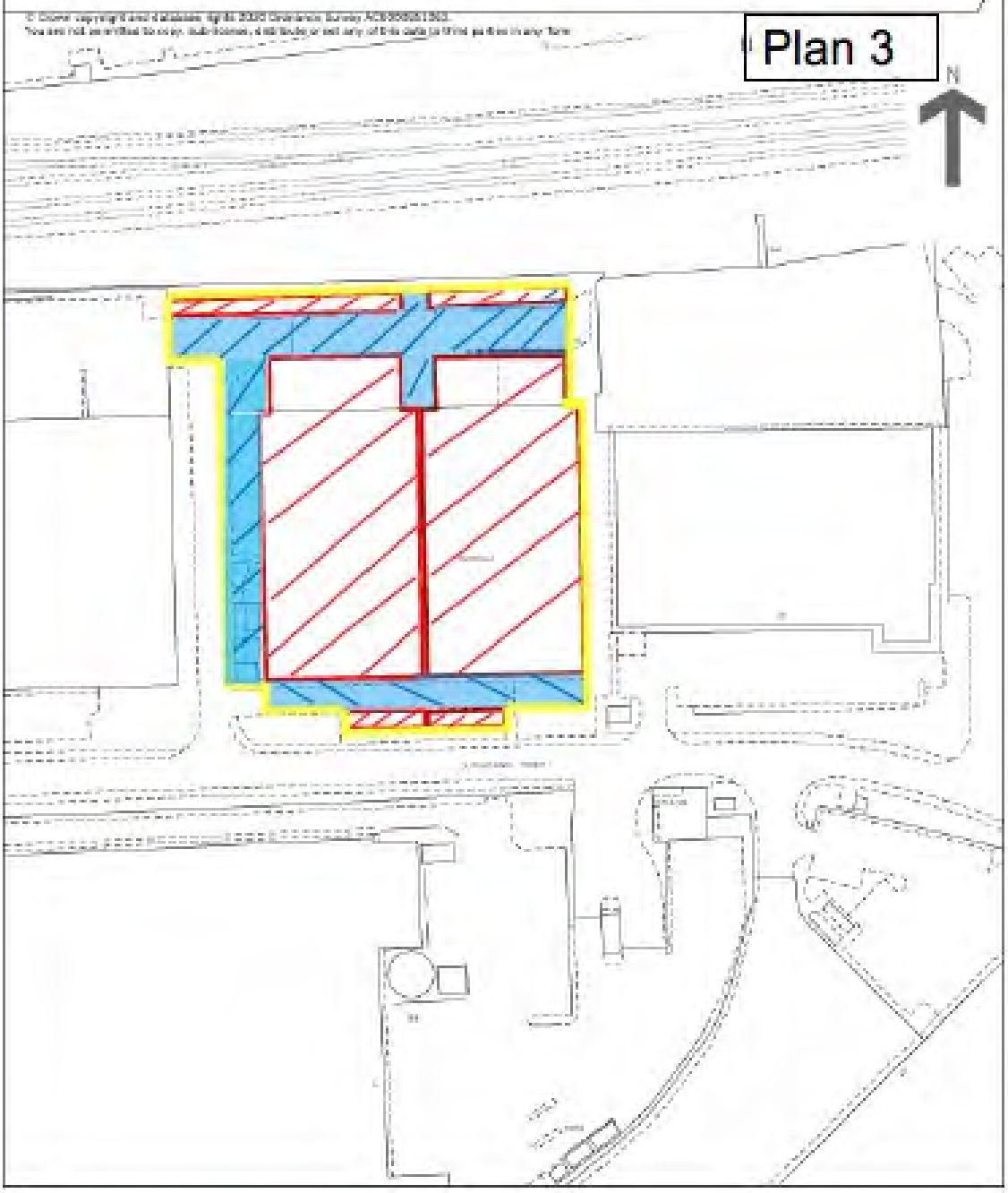
A further hearing in relation to the Order will take place at the Rolls Building, 7 Rolls Building, Fetter Lane, London, EC4A 1NL on 6 October 2025 at which the Claimants will seek an order for a further injunction preventing anyone from obstructing access to or egress from the land and premises shown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

© Crown copyright and database rights 2020 Ordnance Survey AC0000821502.
You are not permitted to copy, sub-license, distribute or sell any of this data to third parties in any form.

Plan 3



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 Aircraft Group Tewkesbury, Ashchurch, Tewkesbury, Gloucestershire, GL20 8NA.

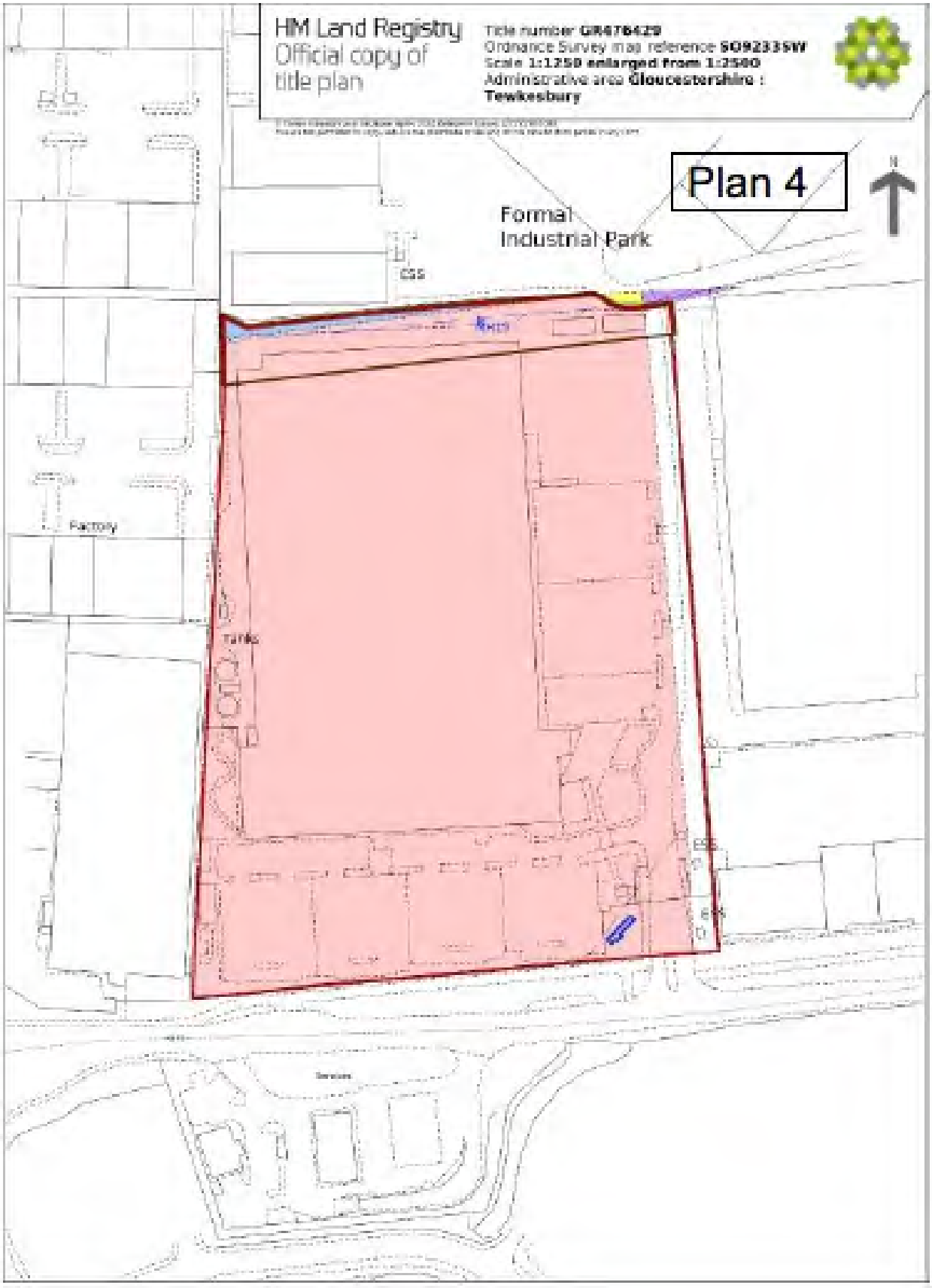
The injunction means you may not:

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 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 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 EGDED RED ON PLAN 5**

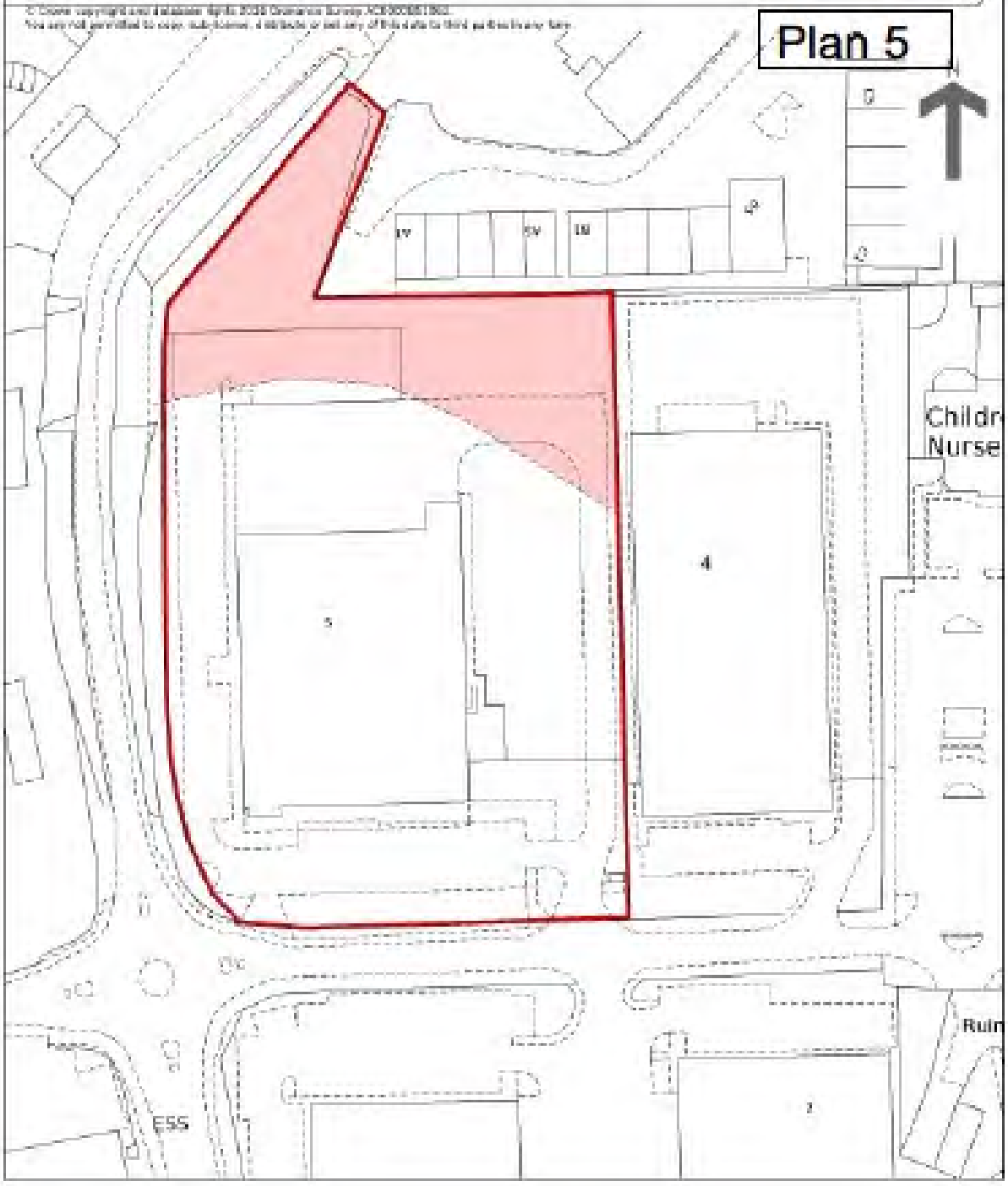
ANYONE BREACHING THE TERMS OF THIS COURT ORDER OR ASSISTING ANY OTHER PERSON IN BREACHING THE TERMS OF THIS ORDER MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE SENT TO PRISON, FINED OR HAVE THEIR ASSETS SEIZED

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**



This official copy is incomplete without the preceding notes page.



IN THE HIGH COURT OF JUSTICE **Claim No: PT-2025-000910**

CHANCERY DIVISION

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 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 (FIRST DEFENDANT)

(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 (SECOND DEFENDANT)

(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 (THIRD DEFENDANT)

(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 (FOURTH DEFENDANT)

(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 (FIFTH DEFENDANT)

Defendants

ORDER

PENAL NOTICE

IF YOU ARE A PERSON WITHIN THE CATEGORIES OF DEFENDANTS MENTIONED ABOVE ("DEFENDANTS") AND DISOBEY THIS ORDER OR INSTRUCT 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 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

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 Thompsell on 6 October 2025

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

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

AND UPON interim injunctive relief having been granted in part by the Honourable Mr Justice Meade on 5 September 2025

AND UPON the Claimants seeking continuation of the interim injunctive relief granted on 5 September 2025 and further injunctive relief preventing the obstruction of or interference with access, as detailed in its application for injunctive relief of 4 September 2025 and draft Order provided therewith

AND UPON READING the Witness Statement of Elwira Kelly dated 4 September 2025, the Second Witness Statement of Elwira Kelly dated 5 September 2025, and the Third Witness Statement of Elwira Kelly dated 1 October 2025, permission to rely on that Third Witness Statement having been granted at the hearing on 6 October 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

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) deliberately and with knowledge of this Order obstruct or interfere with or attempt to obstruct or interfere with access to or egress from the land and premises shown edged red on Plan 1 with or without vehicles by the First Claimant, its agents, employees, contractors, customers, suppliers or other licencees;

(iii) 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) deliberately and with knowledge of this Order obstruct or interfere with or attempt to obstruct or interfere with access to or egress from the land and premises shown edged yellow on Plan 2 with or without vehicles by the Second Claimant, its agents, employees, contractors, customers, suppliers, or other licencees;

(iii) 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) deliberately and with knowledge of this Order obstruct or interfere with or attempt to obstruct or interfere with access to or egress from the land and premises shown edged yellow on Plan 3 with or without vehicles by the Third Claimant, its agents, employees, contractors, customers, suppliers, or other licencees;

(iii) 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) deliberately and with knowledge of this Order obstruct or interfere with or attempt to obstruct or interfere with access to or egress from the land and premises shown edged red on Plan 4 with or without vehicles by the Fourth Claimant, its agents, employees, contractors, customers, suppliers, or other licencees;

(iii) 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) deliberately and with knowledge of this Order obstruct or interfere with or attempt to obstruct or interfere with access to or egress from the land and premises shown edged red on Plan 5 with or without vehicles by the Fourth Claimant, its agents, employees, contractors, customers, suppliers, or other licencees;

(iii) 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.

REVIEW

7. The injunction set out at paragraphs 1 to 6 of this Order shall be reviewed annually on each anniversary of the Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 2 ½ hours. The Claimants are permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton Arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the hearing. The injunction set out at paragraphs 1 to 6 of this Order shall lapse at 4pm on the anniversary of the order (or as the case may be the latest annual review) unless, before then, the Claimants have applied for the review to take place.

SERVICE AND NOTIFICATION

8. Service of this Order is dispensed with, pursuant to CPR 6.28 and 81.4(2)(c).

9. 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 including a QR code linking to the website in paragraph 9(i) above. 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 12 below) shall be replaced with notices in A2 size as soon as reasonably practicable.

10. 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.

11. Notification of any further documents to the Defendants may be effected by carrying out the steps set out in paragraphs 10(i) and 10(ii) only.

12. In respect of paragraphs 9 and 10 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.

13. For the avoidance of doubt, in respect of the steps referred to at paragraphs 9(ii), 9(iii), and 10(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.

14. For the purposes of paragraphs 9(ii), 9(iii) and 10(ii), "prominent location" in relation to each Site means:

(i) All of the locations shown marked on the Plans exhibited to the Third Witness Statement of Elwira Kelly including, for the avoidance of doubt, those locations at the sites shown edged yellow on Plan 2 ("the Luton Site") and edged yellow on Plan 3 ("the Reading Site") where additional notices were proposed to be erected as detailed at paragraph 4(e) of the Third Witness Statement of Elwira Kelly;

(ii) At either side of all entrances to the perimeter of each of the Sites;

(iii) On the perimeter fencing for those Sites which are in whole or in part enclosed by a perimeter fence;

(iv) At the Reading Site, to the extent not already provided pursuant to paragraph 14(i) to (iii), at the entrance points at the south-east, south-west, north-east and north-west of the boundary of the Site shown edged yellow on Plan 3;

(v) At the Luton Site, to the extent not already provided pursuant to paragraph 14(i) to (iii) above, at the entrance to the parking area and loading bay to Unit J at the north-west of the Site, the western end of the walkway between Units C and J and at the entrance to the car parking area to the south of Unit C, each of which are shown hatched blue on Plan 2.

(vi) In the event that the Second Claimant is unable to display copies of the Order and/or warning notices at each of the locations at the Luton Site as provided for by this paragraph of this Order, the Claimants may apply to Court for directions and/or variation of these requirements (but any such application may be made without notice / notification pursuant to paragraph 10).

VARIATION

15. The Claimants have permission to amend the Claim Form and Amended Particulars of Claim to amend the description of the Defendants in each case by adding after the words "Persons unknown who for the purpose of protest" the words "or sabotage". The Claimants shall notify any persons who may be affected by this amendment by:

(i) Uploading a copy of the amended Claim Form and re-amended Particulars of Claim on to the following website: www.moog.co.uk/injunction; and

(ii) Including reference to this amendment and a link to the website where the amended documents can be found in the warning notices referred to at paragraph 9(iii) above.

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.

FURTHER EVIDENCE

19. The Claimants have permission to rely on the Third Witness Statement of Elwira Kelly dated 1 October 2025.

COSTS

20. Costs reserved.

COMMUNICATIONS WITH THE CLAIMANTS

21. The Claimants' contact details are:

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

(2) mooglegal@moog.com.

Dated: 6 October 2025

SCHEDULE 1 – UNDERTAKINGS

1. 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

Plan 1



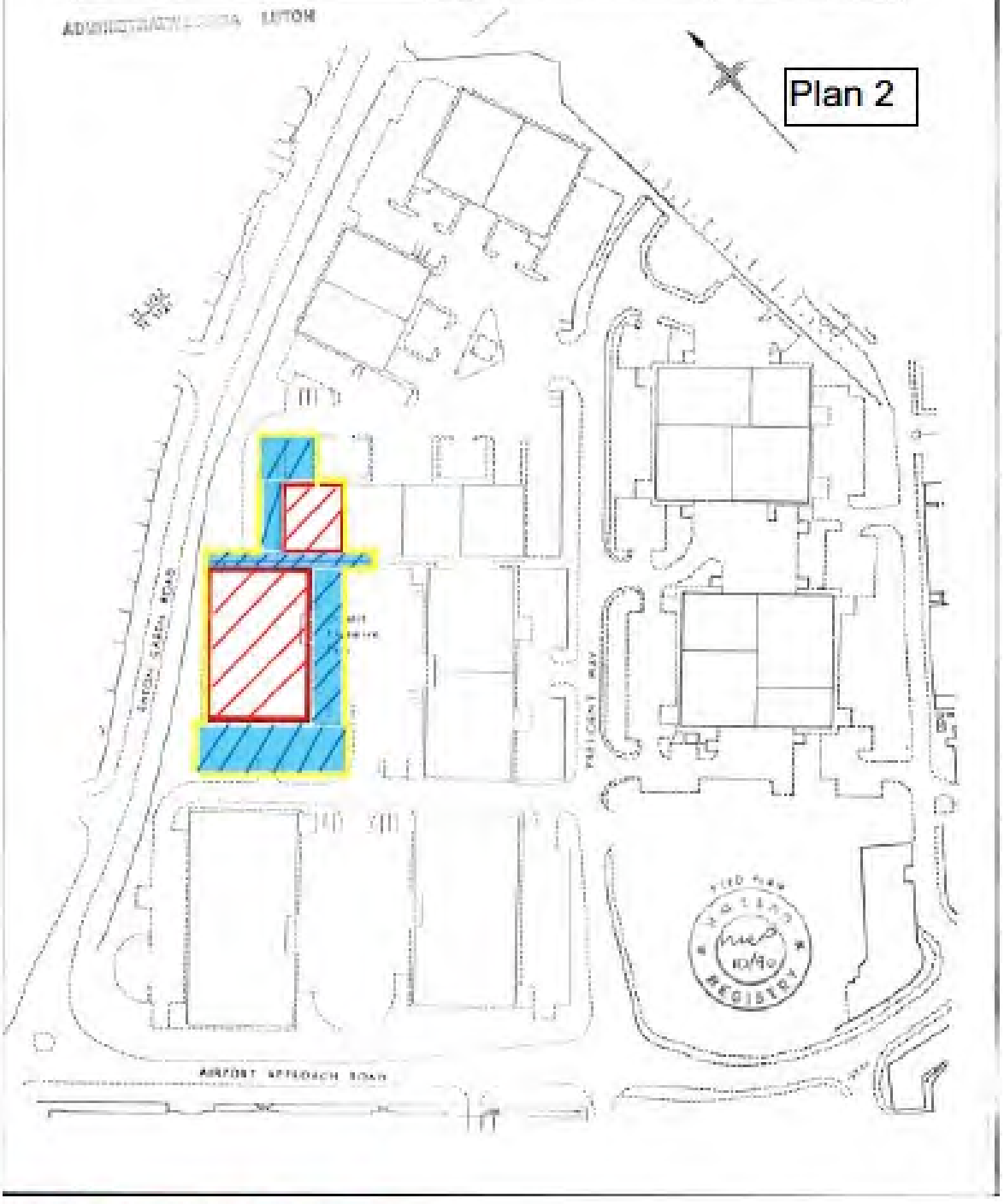
Case Reference: 1H5451.000327 updated plan

M O O G
Valiant Way
Wolverhampton
WV9 5GB

©Crown copyright and database rights 2025. OS AC0000850529
Ordnance Survey
Licensed Data

H.M. LAND REGISTRY		TITLE NUMBER BD154447	
ORDNANCE SURVEY PLAN REFERENCE	TL 1121	SECTION C	Scale 1/1250
[illegible]	[illegible]		© Crown copyright

Plan 2



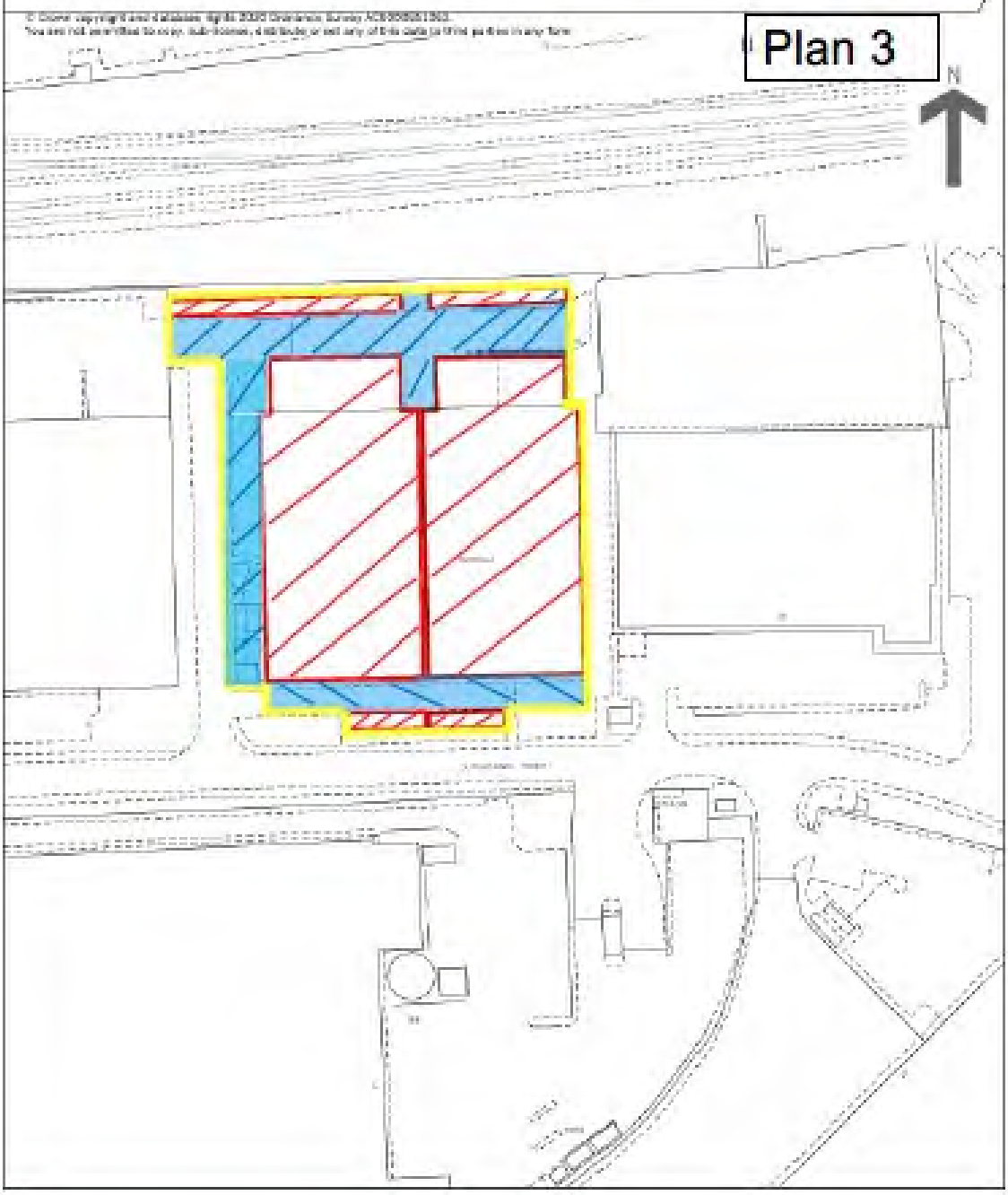
This official copy is incomplete without the preceding notes page.

HM Land Registry
Official copy of title plan

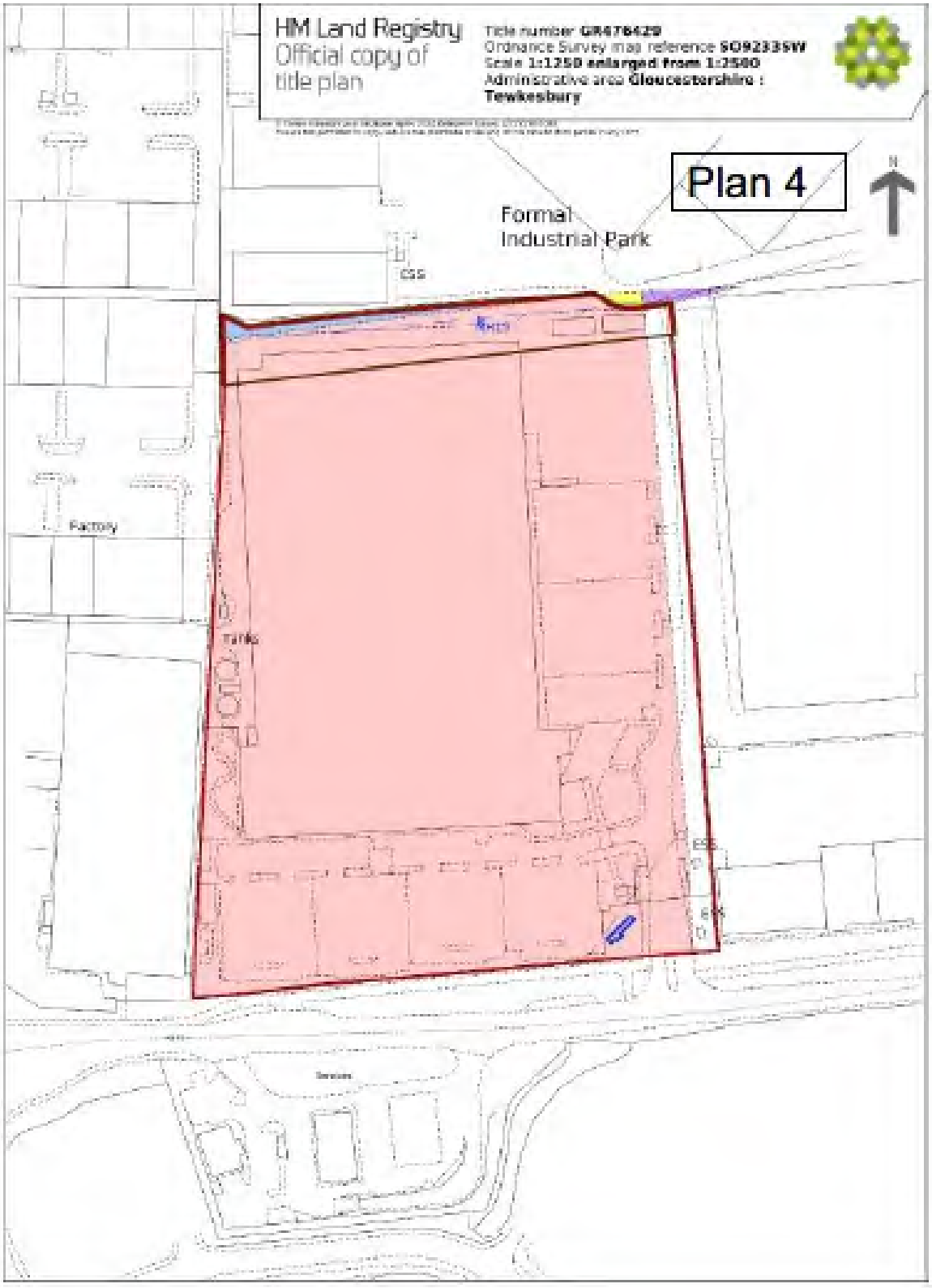
Title number **BK501808**
Ordnance Survey map reference **SU7473NW**
Scale **1:1250**
Administrative area **Wokingham**

© Crown copyright and database rights 2020 Ordnance Survey 100026316.
You are not permitted to copy, sub-license, distribute or sell any of this data to third parties in any form.

Plan 3



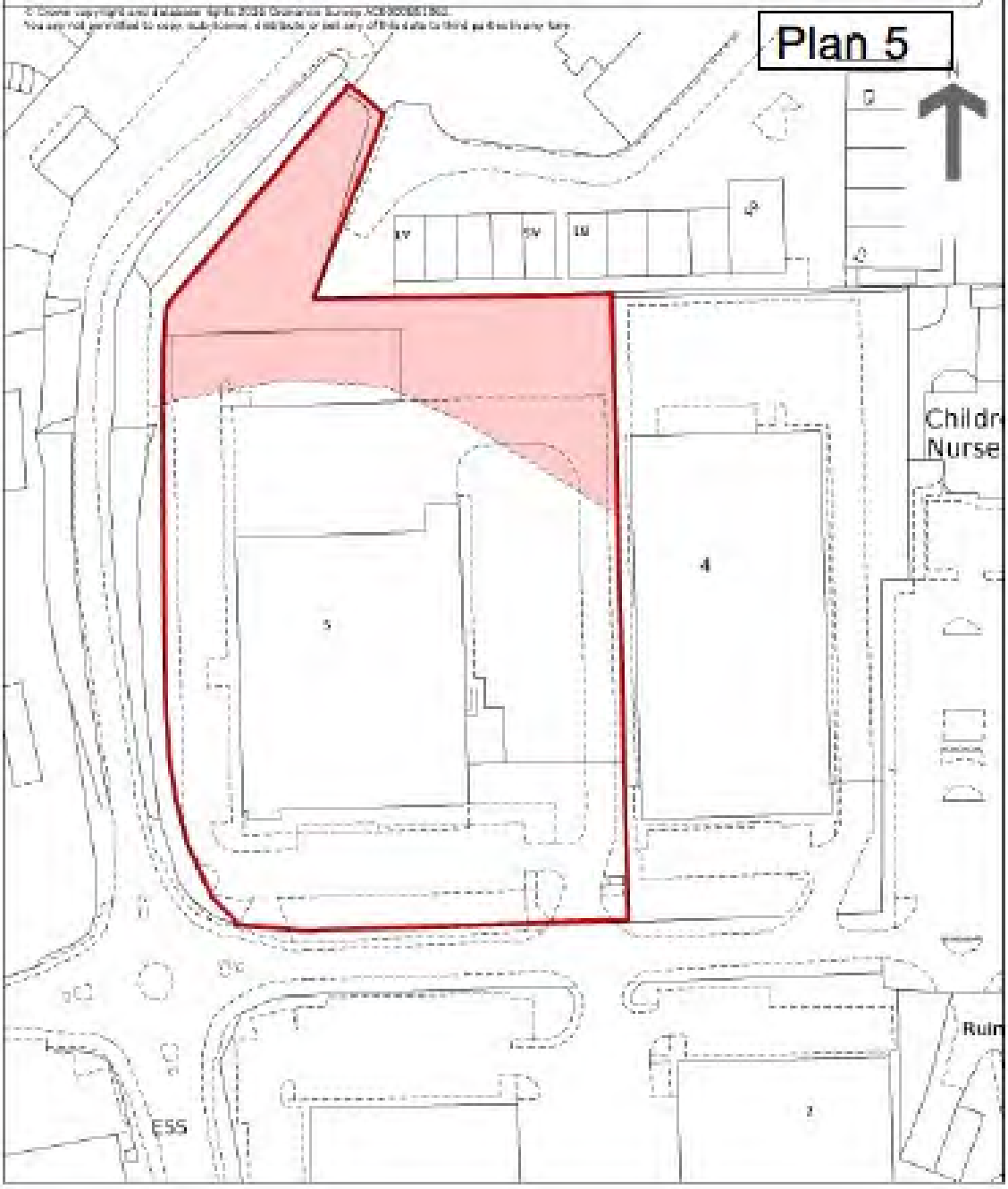
This official copy is incomplete without the preceding notes page.



This official copy is incomplete without the preceding notes page.

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



This official copy is incomplete without the preceding notes page.

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 6 October 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 OR SABOTAGE 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. **DELIBERATELY AND WITH KNOWLEGDE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 1**
3. **INTERFERE OR ATTEMPT TO INTERFERE WITH ANY OF THE SERVICES SERVING THE LAND AND PREMISES SHOWN EGDED 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 (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest) can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com

Plan 1



Case Reference: 1H5451.000327 updated plan

M O O G
Valiant Way
Wolverhampton
WV9 5GB

©Crown copyright and database rights 2025. OS AC0000850529

Ordnance Survey
Licensed Data

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 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:

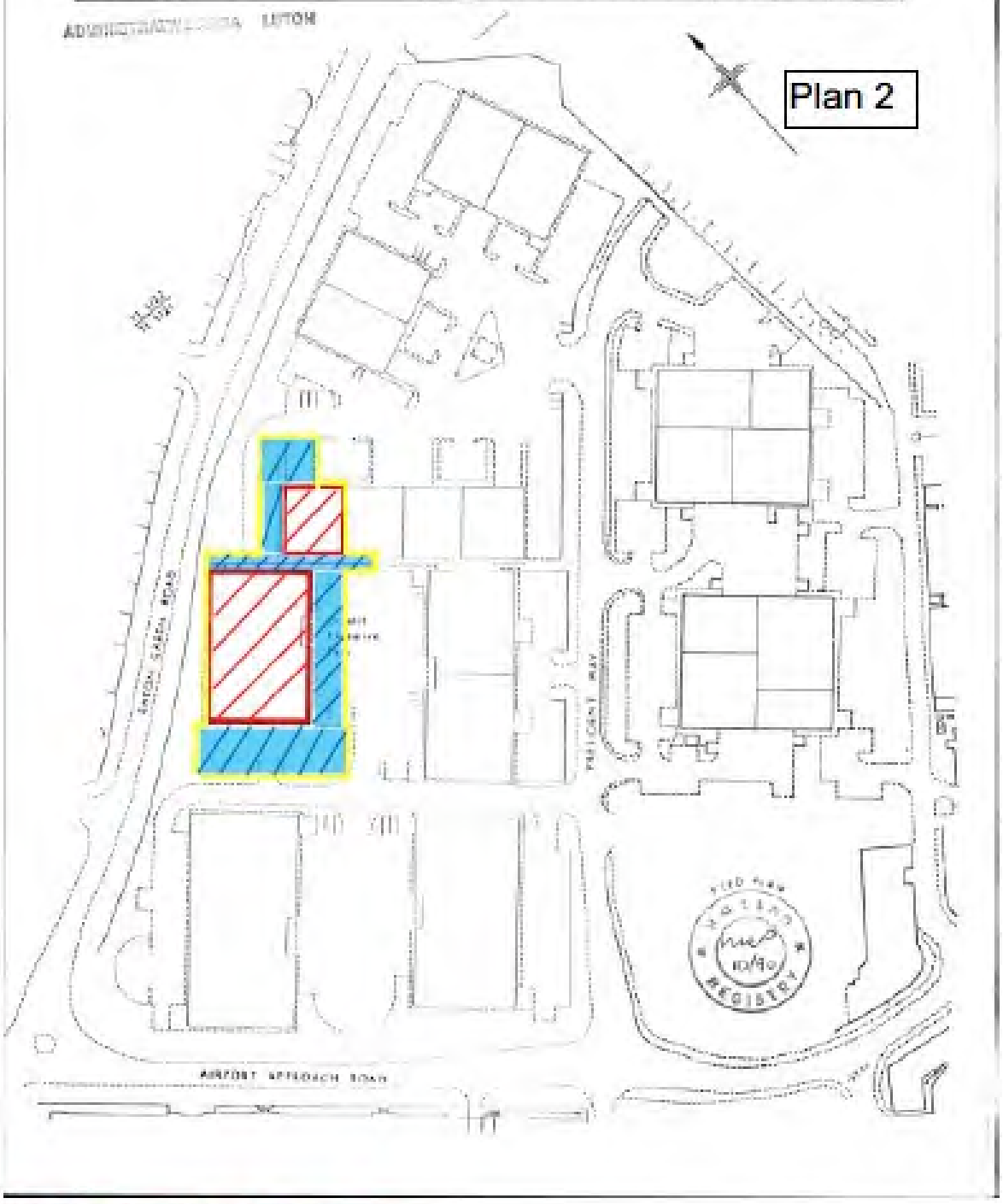
1. **FOR THE PURPOSE OF PROTEST OR SABOTAGE ENTER OCCUPY OR REMAIN ON THE LAND AND PREMISES SHOWN EDGED YELLOW ON PLAN 2 BEING MOOG CONTROLS LTD, UNITS C AND J AIRPORT EXECUTIVE PARK, PRESIDENT WAY, LUTON, LU2 9NY**
2. **DELIBERATELY AND WITH KNOWLEDGE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED YELLOW ON PLAN 2**
3. **INTERFERE OR ATTEMPT TO INTERFERE WITH ANY OF THE SERVICES SERVING THE LAND AND PREMISES SHOWN EGDED 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 (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest)can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com

H.M. LAND REGISTRY		TITLE NUMBER BD154447	
ORDNANCE SURVEY PLAN REFERENCE	TL 1121	SECTION C	Scale 1/1250
[illegible]	[illegible]		© Crown copyright

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 PT-2025-000910 on 6 October 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 OR SABOTAGE 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. **DELIBERATELY AND WITH KNOWLEGDE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED YELLOW ON PLAN 3**
3. **INTERFERE OR ATTEMPT TO INTERFERE WITH ANY OF THE SERVICES SERVING THE LAND AND PREMISES SHOWN EGDED 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

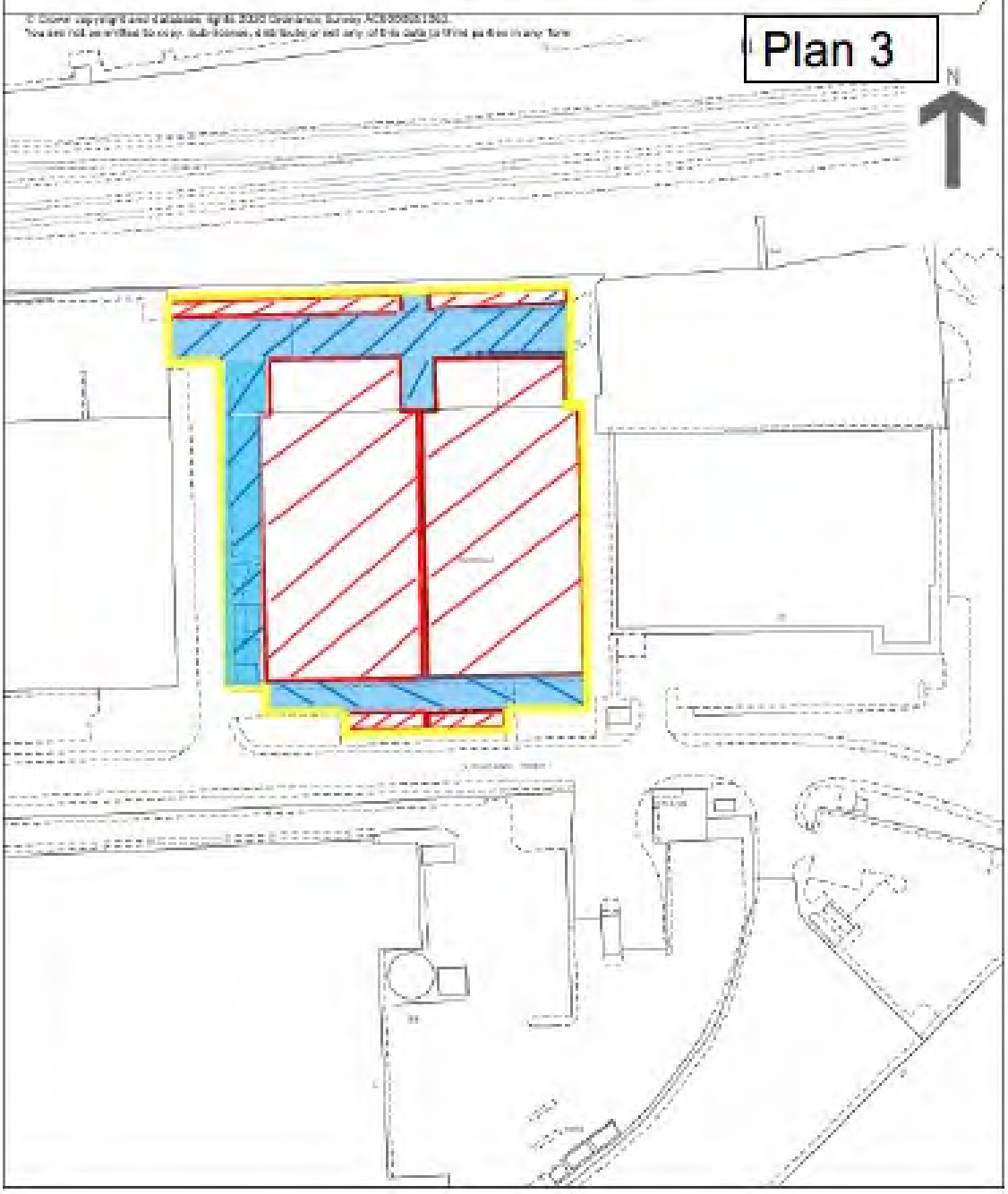
A copy of the Order and the legal proceedings to which it relates (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest)can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com

HM Land Registry
Official copy of
title plan

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

© Crown copyright and database rights 2020 Ordnance Survey AC0000821502.
You are not permitted to copy, sub-license, distribute or sell any of this data to third parties in any form.

Plan 3



This official copy is incomplete without the preceding notes page.

WARNING NOTICE OF COURT INJUNCTION

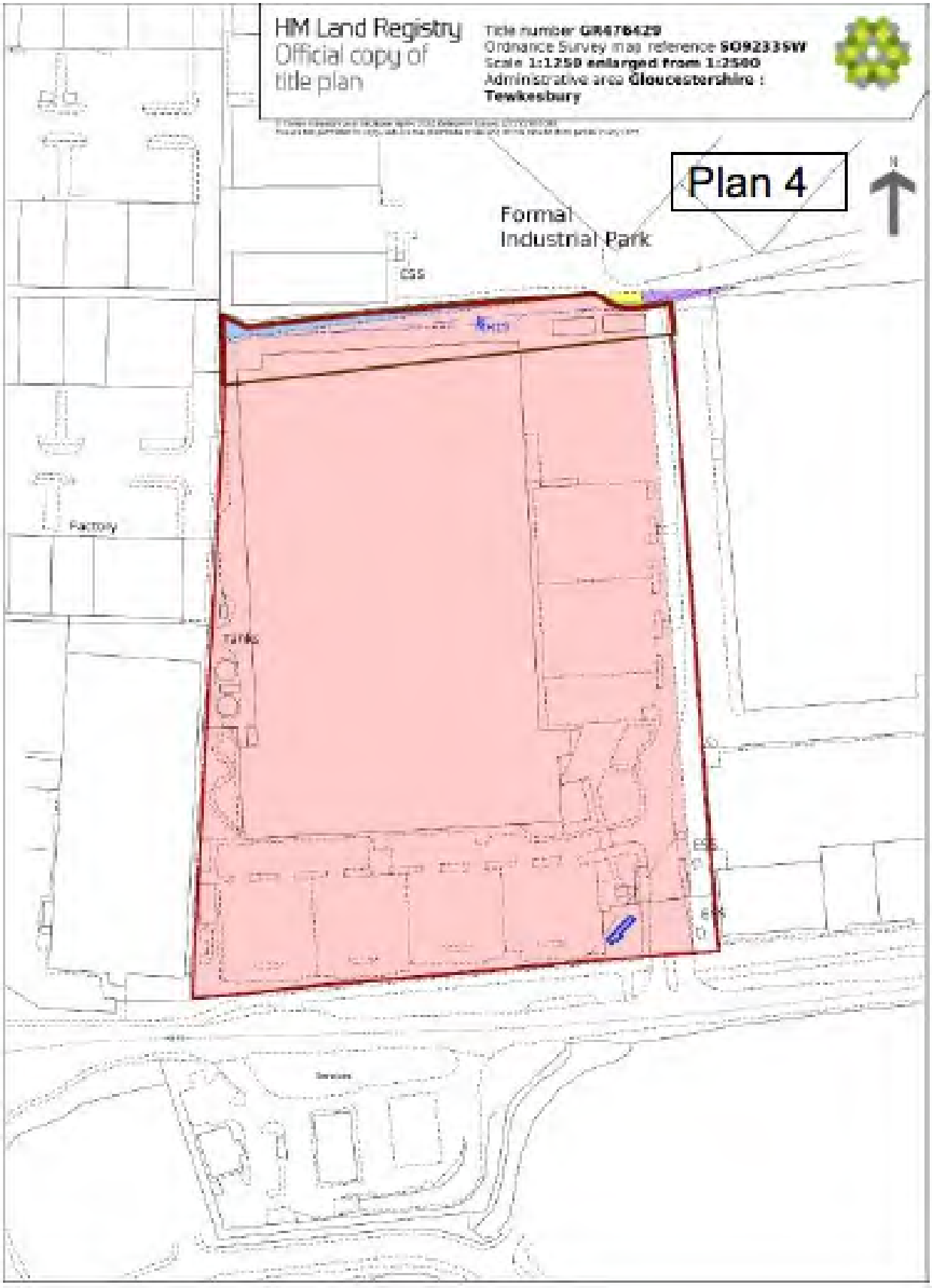
A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Aircraft Group Tewkesbury, Ashchurch, Tewkesbury, Gloucestershire, GL20 8NA.

The injunction means you may not:

1. **FOR THE PURPOSE OF PROTEST OR SABOTAGE 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. **DELIBERATELY AND WITH KNOWLEGDE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 4**
3. **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 (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest) can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.


HM Land Registry
Official copy of
title plan
Title number GR476429
Ordinance Survey map reference SO9233SW
Scale 1:1250 enlarged from 1:2500
Administrative area Gloucestershire :
Tewkesbury
Plan 4
Formal
Industrial Park
CSS
Factory
Tanks

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 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:

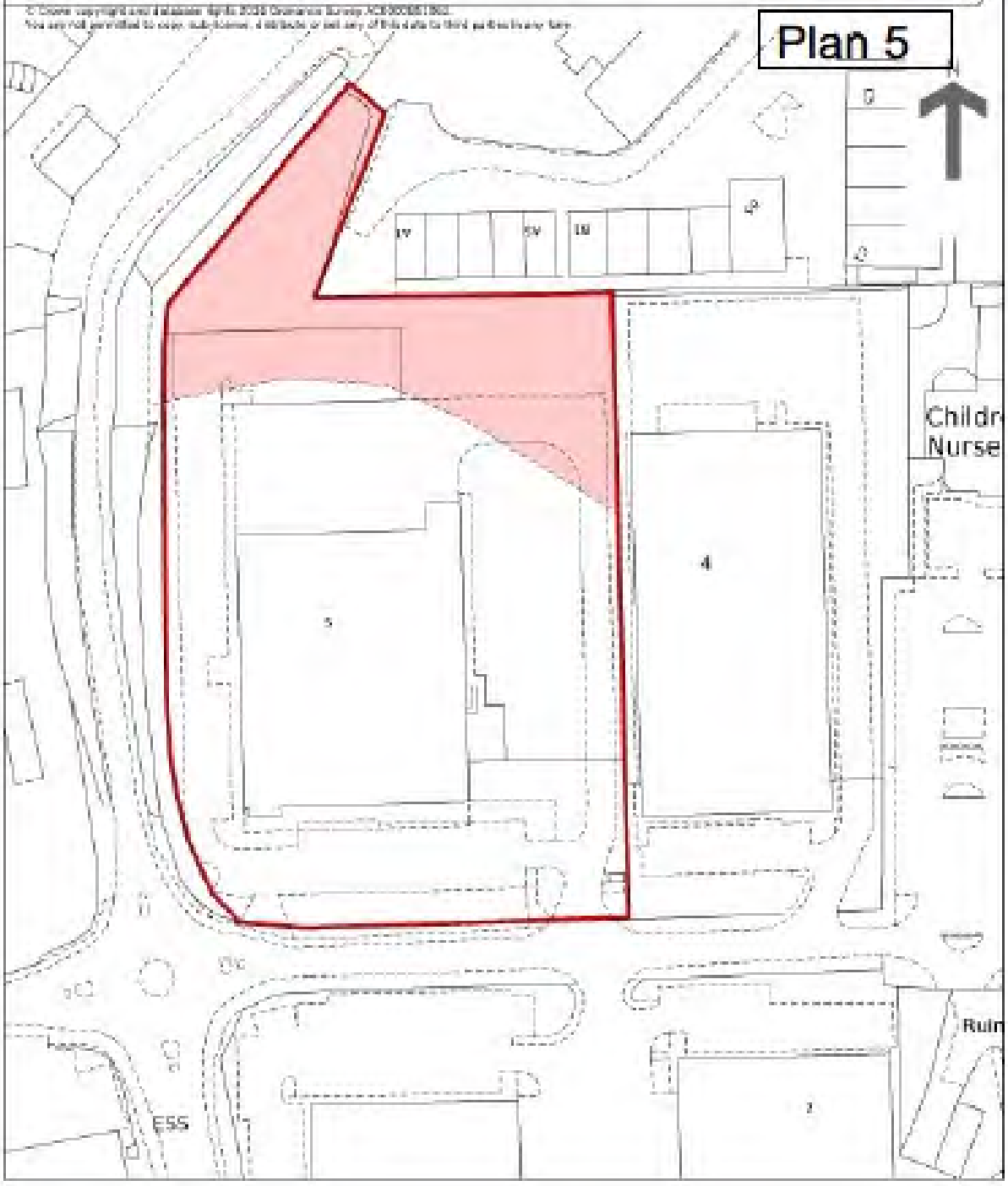
1. **FOR THE PURPOSE OF PROTEST OR SABOTAGE ENTER OCCUPY OR REMAIN ON THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 5 BEING MOOG INDUSTRIAL GROUP, ASHCHURCH PARKWAY, TEWKESBURY, GLOUCESTERSHIRE, GL20 8TU**
2. **DELIBERATELY AND WITH KNOWLEDGE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 5**
3. **INTERFERE OR ATTEMPT TO INTERFERE WITH ANY OF THE SERVICES SERVING THE LAND AND PREMISES SHOWN EGDED 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 (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest)can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com:

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**



This official copy is incomplete without the preceding notes page.

Note of Hearing

Moog v Persons Unknown – PT-2025-000910

Date: 6 October 2025

Background

The hearing was the return hearing following interim injunctive relief granted on 5 September 2025 against Persons Unknown ("PUs"), restraining direct-action protest at various Moog sites. The application followed an incident at Moog's Wolverhampton facility on 26 August 2025 involving trespass and extensive property damage. The Claimants maintained that a continuing threat remained to their other sites.

No representatives of PUs were present at the hearing.

Claimant's Submissions

The Claimants submitted that the Court had jurisdiction to grant a "newcomer" injunction under the principles in *Wolverhampton CC v London Gypsies & Travellers* [2024]. Notices of the interim injunction had been displayed at the relevant sites. Although there had been no breach since the interim order, the Claimants relied on suspicious activity around the sites and other evidence as showing that the threat had not sufficiently abated.

Counsel for the Claimants confirmed that the Claimants did not seek to add the arrested individuals as named defendants, because they remained in custody and were not considered a present threat. The Claimants relied on material including a Palestine Action manual encouraging targeting of private-sector organisations and property damage, alongside evidence of action against other entities and online activity.

The Claimants accepted that the rights under Articles 10 and 11 of the ECHR were not necessarily disengaged merely because protest occurred on private land. Their position was nevertheless that those rights carried limited weight where protesters sought to enter private property and that the balance came down in favour of the Claimants' proprietary rights.

The Claimants also sought protection against obstruction of access to and egress from the sites. Counsel for the Claimants confirmed that the proposed order was not intended to prevent people assembling outside the factories but to prevent interference with employees and others entering or leaving. He relied on risks said to be associated with protests and evidence concerning targeting of other companies.

To address proportionality and notice concerns raised by the Judge, counsel for the Claimants indicated a preference for qualifying the prohibition on obstruction of access to and egress from the sites with "deliberately." . Counsel subsequently suggested adding "with knowledge of this order". Counsel for the Claimants also agreed with the Judge's suggestion that the definition of PUs could be amended to refer to persons acting for the purpose of "protest or sabotage", and that wording extending the definition of PUs to persons "encouraging" prohibited conduct should be removed due to the potential that this would interfere with Convention rights.

Judicial concerns and notice requirements

The Judge was minded to grant relief but raised a number of concerns as to the scope and practical operation of the injunction, addressed in the paragraph above.

The Judge also queried whether adequate notice would be given. At some sites, particularly Reading and Luton, a person might enter the injuncted area before encountering a notice and could therefore inadvertently breach the order. This led to discussion of additional notices at access points and the introduction of the "with knowledge of this order" qualification to the injunction scope.

The Judge directed enhanced notification arrangements, including notices at entrances and appropriate perimeter locations, QR codes linking to the relevant website, and checks that notices remained in place. Where practical difficulties arose concerning the right to place notices on particular land, the Claimants could return to Court for directions.

The Court considered the arrangements at each site individually:

- **Wolverhampton**: Having reviewed the existing notice positions, the Judge considered the arrangements adequate. No equivalent additional notice requirements were identified for this site.

- **Luton:** The Judge examined the plan and existing notice locations in detail. He identified a number of potential access points at which further notices should be displayed, including around the principal entrance, an apparent pedestrian entrance to the west and other points from which the relevant red or blue-hatched land could be accessed. The Judge's proposed approach was that notices should be placed at each point from which the relevant land could be accessed. Counsel raised uncertainty about whether the Claimants had sufficient rights or control over some of the car park or surrounding land to erect notices there. The Judge indicated that, if there were difficulties in complying because of land ownership or control, the Claimants could return to Court for directions. Existing notices were to remain in place and the additional notices were to supplement them.

- **Reading:** Existing notices for the Reading site were shown on the aerial photograph, but the Judge identified further locations where notice should be given, including an apparent entrance on the south-west side and the additional locations marked during the hearing. The Judge directed that additional notices should be installed and that, where this required the involvement of third parties, they should be informed that their placement had been directed by the Court.

- **Tewkesbury (Aircraft):** Having reviewed the existing notice positions, the Judge considered the arrangements adequate because there was only one entrance. No equivalent additional notice requirements were identified for this site.

- **Tewkesbury (Industrial):** Counsel noted that the notices appeared to have been placed on the building itself and suggested that notices should also be displayed on the perimeter fence. The Judge agreed that notices should be placed on the

perimeter fence, suggesting they could be interspersed approximately every 200 yards, with two notices either side of each entrance.

Judgment

The Judge said the following:

- The Claimants are involved in manufacturing of aeronautical equipment. By means of a Claim Form dated 4 September 2025 and amended Particulars of Claim dated 5 September 2025, the Claimants are seeking an order to restrain certain actions including entering, egressing or damaging or remaining on the land of various sites in ownership of the Claimants as specified in the draft order. This was first sought in original application, but not awarded in Meade J's order.

- The relevant danger is highlighted by the fact there has already been one very serious incident at one of the sites at which the Claimants' group operates, involving trespass and some damage to property. PUs have been given notice by means of various forms of alternative service provided for in the order.

- The Claimants are seeking this order in response to groups sympathetic to the Palestinian cause against companies allegedly supplying equipment to the Israeli defence force. The application is brought against PUs and the court's jurisdiction to give newcomer injunctions has been recently stated in *Wolverhampton CC*. Here, the Supreme Court recognised there is no moveable obstacle as to jurisdiction that would prevent ordering an injunction against newcomers which is on a without notice basis. However, care is needed in applying the principles in that case to a different sort of case, a protest case, like the one before the judge as noted that that case dealt with travellers.

- In *Vellero Energy limited v PU* [2024], Justice Ritchie dealing with an application for a final injunction with summary judgment provided that the guidance in *Canada Goose v PU* [2021] remains good law, albeit some further guiding principles have been added. *Vellero Energy* helpfully distilled guidance into a mixture of substantive and procedural requirements.

- In *Multiplex Construction Europe Limited v PU* [2024], Justice Ritchie considered similar grounds for granting a final prohibitionary injunction, and in *HS2 v PU*, precautionary injunctions against PU related to private land possessed by claimants are "*different beasts compared to old fashioned injunctions against known defendants that need to be taken to trial*". These cases may never lead to service of defences by PU, whether or not they become crystalised as defendants.

The Judge then explained a number of principles and requirements in granting an injunction:

- **Substantive requirements**

  (a) The claimant must have a cause of action: This is trespass here as protestors have no right to occupy land. The new element here not dealt with by Meade J - blocking access to the land - is not dealt with by trespass, but clearly involves tortious action;

  (b) Full and frank disclosure: This is important even where there has been clear notice as there has been in this case, as PUs may not have had opportunity to speak at the hearing. I am satisfied that the Claimants have satisfied this requirement and in this case that there may be defences available to PUs;

  (c) No realistic defence: There is no suggestion that the Claimants are not entitled to control occupation of their land and no defence is likely to arise on property rights. But defences on human rights grounds could be considered here, especially on access roads not in ownership of the Claimants in extending the existing injunction to cover access and egress. The same was considered by Johnson LJ in the *Birmingham University* and *University of Nottingham* cases; as regards the Claimants' own property I consider those facts and analysis to be relevant in this case. However, the access road is slightly different. Peaceful protest falls within Articles 10 and 11 of the ECHR, but these are not absolute and are qualified. Interference with freedom of speech and assembly can be limited if required by law and in a democratic society. The Claimants have right to peaceful enjoyment of

their private property as enshrined in Article 1. An important point of analysis of the Articles is that they do not bestow any freedom of forum on defendants (*Appleby*). I accept the Claimants' submission that any injunctive relief sought would constitute a breach of the PUs rights under Articles 10 and 11 and would be bound to fail in regard to its own property. As regards the extension of the injunction to deal with the highway, the question is more nuanced, but I am persuaded that the position is similar to that of the *HS2* case; it is proportionate to include an injunction as to the adjoining public land as this will not prevent protest, but will prevent the obstruction of access and egress to the Claimants' property as to lawful visitors and this is only where deliberately made and with knowledge of injunction;

(d) Sufficient evidence to prove the claim: The Claimants submit there is a serious issue to be tried and that they have a realistic prospect of success. I consider that the Claimants are correct, as there are serious risks on social media which show the intention of pro-Palestinian groups against alleged suppliers of the IDF. There is no evidence as to whether the Claimants are such suppliers, but that there are some groups that do consider they are which may put the Claimants in the firing line. In my view, there is ample evidence that the Claimants are justified in their fears of future unlawful trespass and damage to their land, and there is no evidence that has abated. To the contrary there is evidence that is capable of being read that some groups are continuing surveillance of at least some sites.

(e) Damages are not an adequate remedy: I consider this is clear. The Claimants' lawful business should be allowed to continue, and this would be disrupted in a way not remedied by damages; and

(f) Any other remedy the Claimants could pursue to make the injunction unnecessary: We did not discuss in the hearing, but to be clear I do not see any other remedy other than dramatically increasing private security which

would be costly, and security without the backing of the court would be likely to face resistance..

- **Procedural requirements**

  (a) PUs must be clearly and plainly identified. They are, in the form of order put forward;

  (b) Terms of prohibition should be set out clearly, not framed in legal technical terms. I consider this to be the case;

  (c) Prohibition must match pleaded claim. I find this to be straightforwardly met;

  (d) Should be defined geographic boundaries. This point is clearly met under the terms of the order;

  (e) Temporal boundaries. The duration of injunction should only be a long as is reasonably necessary to protect the Claimants' legal rights. The Claimants propose yearly reviews and an automatic lapse if purpose of injunction is not sustained. in my view this is appropriate in this case;

  (f) Service. Satisfied service of the claim has been undertaken in accordance with the Meade J order. This order should be undertaken in broadly the same way, but I have suggested some additional points in which service of the order should be given;

  (g) Provision for PUs to set aside order. The order provides for this.

  (h) Review. This is melded into the point already made that the order will only last a year and is subject to review then.

- The court must then ask itself where the balance of convenience lies. It is appropriate to consider the *TPP v Zeigler* case from 2021. The protests to date have involved extensive damage to property, weighing heavily on the court's mind in relation to balance of convenience. Rights and wrongs of the matter over what the protesters are protesting is a much bigger matter than the one before the court

and would not be appropriate for the court to comment on this. If the injunction is not granted there is real risk the Claimants will face the realistic threat of unplanned invasions and damage to property. Whereas if an injunction is granted, the interference to defendants is limited and they are not prevented from protesting but from trespassing and damage. The Claimants have offered the usual indemnity should the defendants show cost. If circumstances change any defendants have the ability to return to the court to challenge the order.

- Therefore, the order should be granted in form with small amendments as discussed during this hearing.
- The court granted the precautionary injunction in terms sought with minor amendments discussed in the hearing.
- Costs are reserved.

Counsel for the Claimants noted that the warning notice will make reference to sabotage, and asked the court it permission to amend warning notice to include sabotage is granted. The Judge confirmed this was granted.

Docusign Envelope ID: 5E2996EE-A5B7-441C-9FBE-39CC71670C6C

Amended pursuant to the order of Thompsell HJ dated 6 October 2025, made pursuant to CPR 17.3

Claim Form (CPR Part 8)

In the	High Court of Justice Chancery Division
Claim no.	PT-2025-000910
Fee Account no.	
Help with Fees - Ref no. (if applicable)	H W F – –

HIGH COURT OF JUSTICE
THE BUSINESS & PROPERTY COURTS OF ENGLAND & WALES
17 Oct 2025

PT-2025-000910

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

SEAL

Defendant(s)
Persons Unknown (See Schedule 1)

Does your claim include any issues under the Human Rights Act 1998? ☐ Yes ☑ No

Details of claim (see also overleaf)
See attached Re-Amended Particulars of Claim.

Defendant's name and address
See Schedule 1

	£
Court fee	646
Legal representative's costs	
Issue date	22 October 2025

For further details of the courts www.gov.uk/find-court-tribunal.
When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

© Crown copyright 2020

Docusign Envelope ID: 5E2996EE-A5B7-441C-9FBE-39CC71670C6C

Claim no.	PT-2025-000910

Details of claim (continued)

See attached Re-Amended Particulars of Claim.

Moog Wolverhampton Limited
Valiant Way
Wolverhampton
West Midlands
United Kingdom WV9 5GB

MoogLegal@moog.com

Claimant's or claimant's legal representative's address to which documents should be sent if different from overleaf. If you are prepared to accept service by DX, fax or e-mail, please add details.

Docusign Envelope ID: 5E2996EE-A5B7-441C-9FBE-39CC71670C6C

Statement of Truth

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.

☐ **I believe** that the facts stated in these particulars of claim are true.

☑ **The Claimant believes** that the facts stated in these particulars of claim are true. **I am authorised** by the claimant to sign this statement.

Signature

Signed by:
Elwira Kelly
92C7F87347624E7...

☑ Claimant

☐ Litigation friend (where claimant is a child or a Protected Party)

☐ Claimant's legal representative (as defined by CPR 2.3(1))

Date

Day	Month	Year
22	10	2025

Full name

Elwira Kelly

Name of claimant'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

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

Docusign Envelope ID: 5E2996EE-A5B7-441C-9FBE-39CC71670C6C

SCHEDULE 1 – LIST OF DEFENDANTS

(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

, Wolverhampton, WV9 5GB

Plan 1



Case Reference: 1H5451.000327 updated plan

M O O G
Valiant Way
Wolverhampton
WV9 5GB

©Crown copyright and database rights 2025. OS AC0000850529

Ordnance Survey
Licensed Data

Docusign Envelope ID: 5E2996EE-A5B7-441C-9FBE-39CC71670C6C

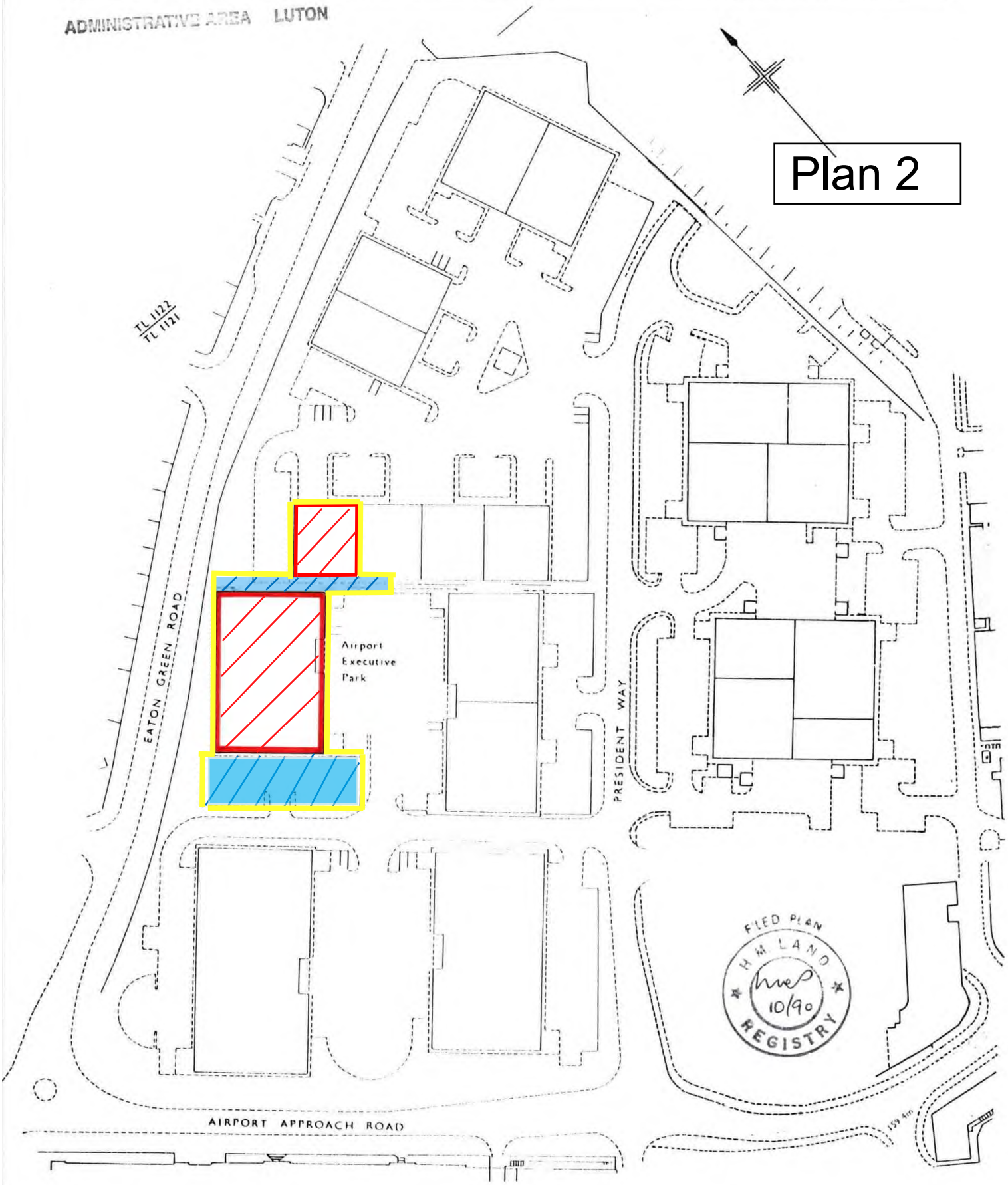
H.M. LAND REGISTRY

TITLE NUMBER	
BD 154447	

ORDNANCE SURVEY PLAN REFERENCE	TL 1121	SECTION C	Scale 1/1250
~~COUNTY BEDFORDSHIRE~~	~~DISTRICT LUTON~~		© Crown copyright

ADMINISTRATIVE AREA LUTON

Plan 2



This official copy is incomplete without the preceding notes page.

Docusign Envelope ID: 5E2996EE-A5B7-441C-9FBE-39CC71670C6C

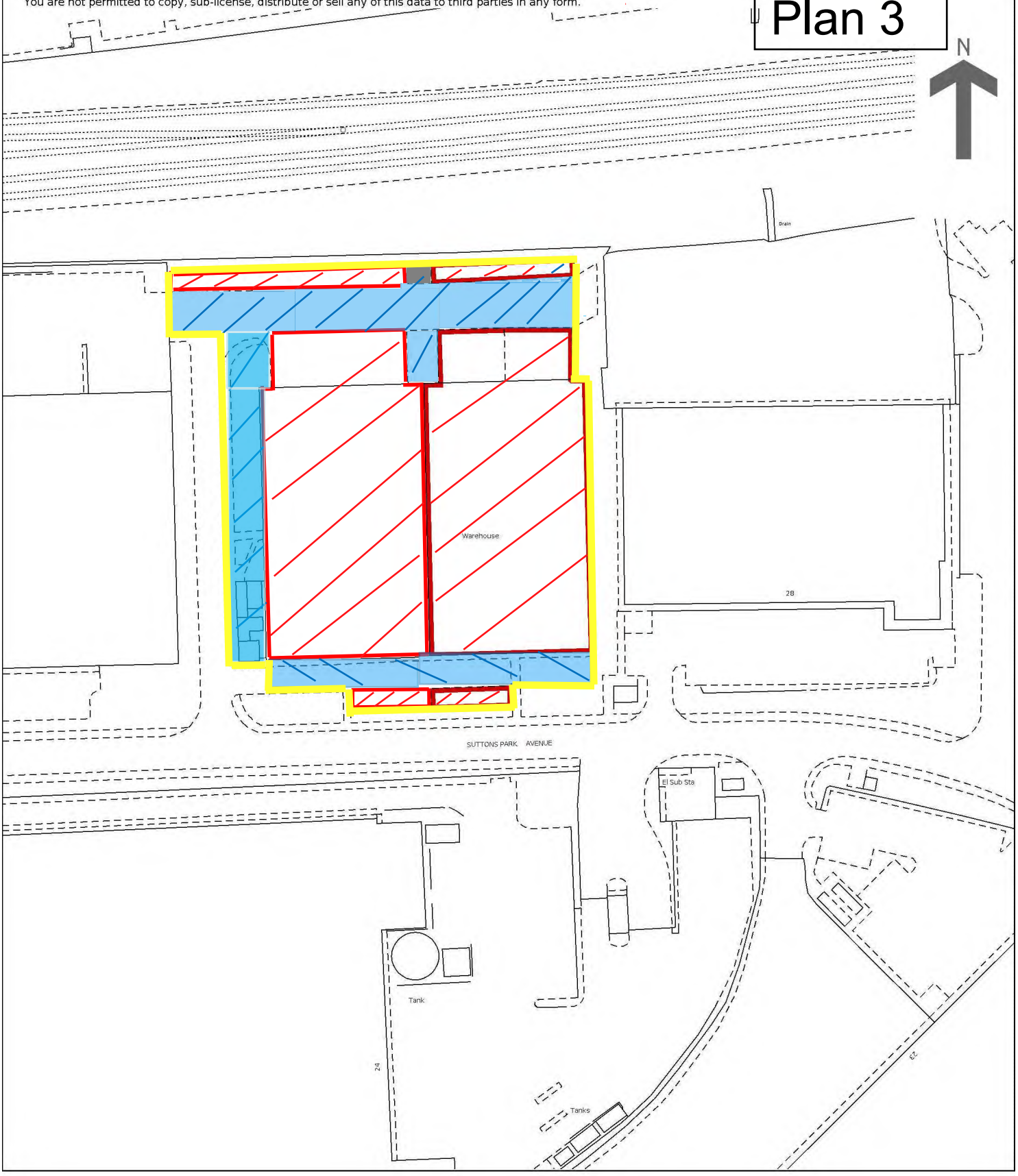
HM Land Registry
Official copy of title plan

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

© Crown copyright and database rights 2020 Ordnance Survey AC0000851063.
You are not permitted to copy, sub-license, distribute or sell any of this data to third parties in any form.

Plan 3

N



This official copy is incomplete without the preceding notes page.

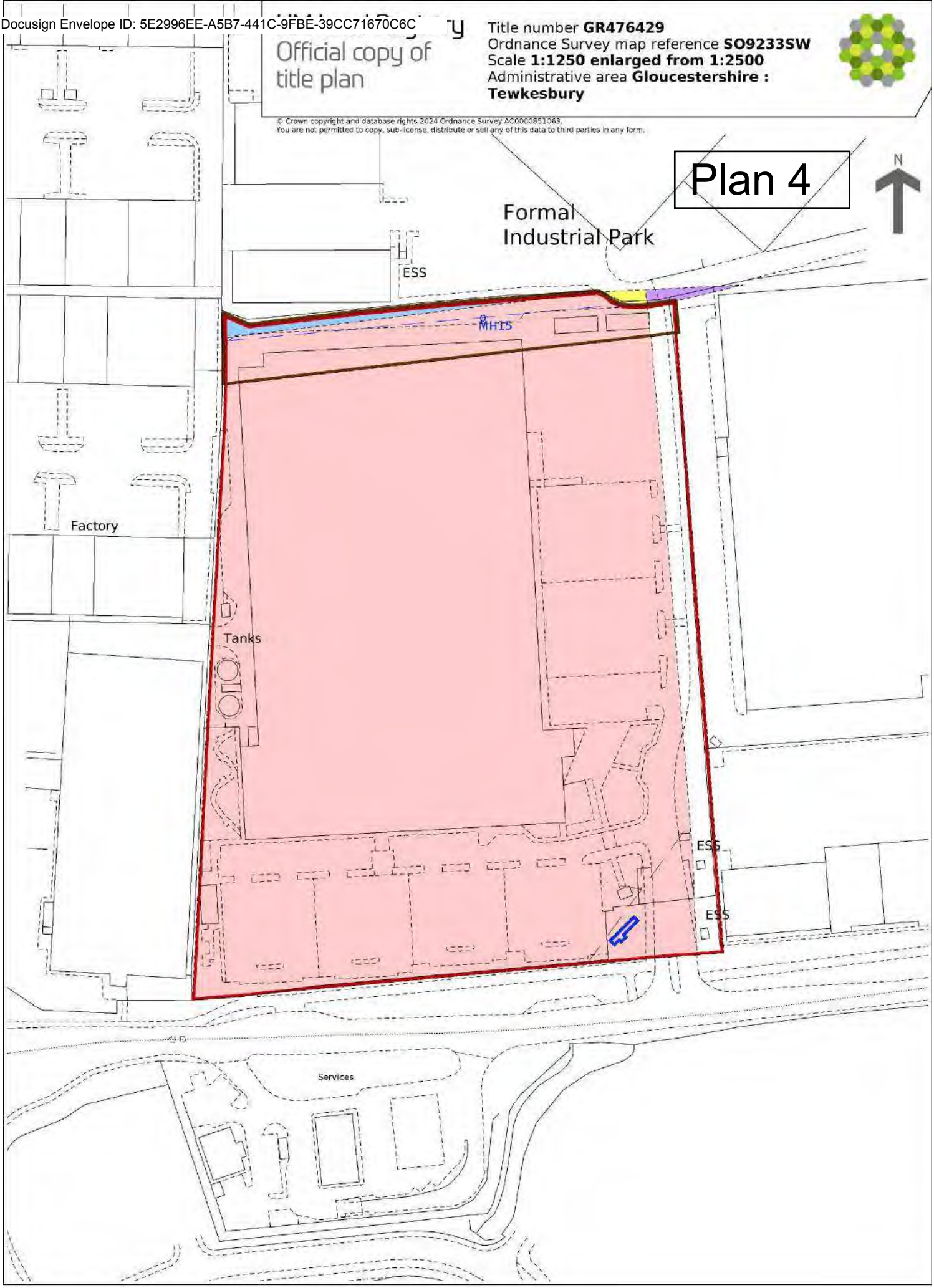
Docusign Envelope ID: 5E2996EE-A5B7-441C-9FBE-39CC71670C6C

Official copy of title plan

Title number **GR476429**
Ordnance Survey map reference **SO9233SW**
Scale **1:1250 enlarged from 1:2500**
Administrative area **Gloucestershire : Tewkesbury**

© Crown copyright and database rights 2024 Ordnance Survey AC0000851063.
You are not permitted to copy, sub-license, distribute or sell any of this data to third parties in any form.

Plan 4



This official copy is incomplete without the preceding notes page.

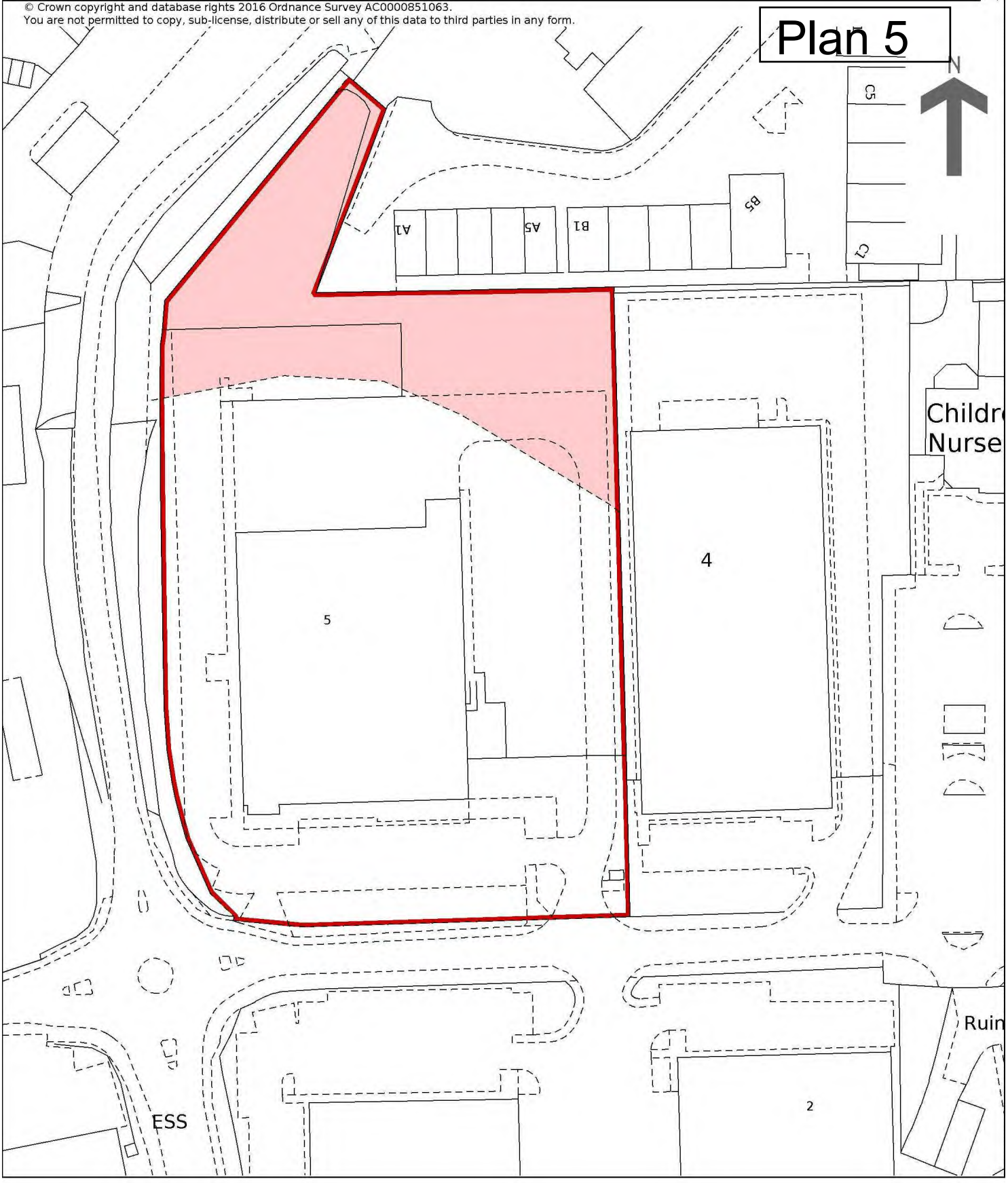
Docusign Envelope ID: 5E2996EE-A5B7-441C-9FBE-39CC71670C6C

HM Land Registry
Official copy of title plan

Title number **GR395822**
Ordnance Survey map reference **SO9233SW**
Scale **1:1250 enlarged from 1:2500**
Administrative area **Gloucestershire : Tewkesbury**

© Crown copyright and database rights 2016 Ordnance Survey AC0000851063.
You are not permitted to copy, sub-license, distribute or sell any of this data to third parties in any form.

Plan 5



This official copy is incomplete without the preceding notes page.

Docusign Envelope ID: 38A9D259-CCEA-4E54-92FE-B0189B811B63

IN THE HIGH COURT OF JUSTICE **Claim No:**

CHANCERY DIVISION

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 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

Docusign Envelope ID: 38A9D259-CCEA-4E54-92FE-B0189B811B63

(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

RE-AMENDED PARTICULARS OF CLAIM UNDER CPR ~~r.17.1(1)~~ r.17.2(b)

DATED ~~5 SEPTEMBER 2025~~7 OCTOBER 2025

THE CLAIMANTS

1. The Claimants are UK subsidiaries of Moog Inc, an American based company which designs and manufactures controls and systems for aerospace, defence, industrial, and medical applications. Companies within the Moog Inc group, including the Claimants, hold contracts with various military aircraft end users (amongst other clients).

THE LAND TO WHICH THE CLAIM RELATES

2. The First Claimant is the freehold owner of the site known as Moog Aircraft Group Wolverhampton, Valiant Way, Pendeford, Wolverhampton, WV9 5GB, title to which is registered at HM Land Registry under title numbers SF470338, SF498970, SF606388 and SF694209 ("the Wolverhampton Land"). The part of the Wolverhampton Land over which Moog seeks this injunction consists of the land shown edged red on Plan 1 annexed to these Re-Amended Particulars of Claim (the "Wolverhampton Site").

Docusign Envelope ID: 38A9D259-CCEA-4E54-92FE-B0189B811B63

3. The Wolverhampton Site comprises a large industrial building with parking and circulation space enclosed by security fencing. The site is used for the manufacture of primary and secondary flight control actuators for military and commercial end use.

4. The airspace above the building is subject to a lease between the First Claimant and Centrica Business Solutions (Generation) Limited ("Centrica") dated 1 May 2024 by which Centrica is granted rights to (inter alia) install and maintain solar panels on the roof of the building, together with associated rights of access for the purpose of exercising its rights under the lease ("the Airspace Lease"). The premises demised to Centrica do not include the roof of the building itself.

5. The Second Claimant is the registered leasehold proprietor of the site known as Moog Controls Ltd Luton, Units C and J Airport Executive Park, President Way, Luton, LU2 9NY ("the Luton Site").

6. The Luton Site comprises two units on the Airport Executive Park, being Units C and J (the "Units"), separated by a strip of land which is retained by the freehold owner but over which the Second Claimant enjoys rights of access in common with the landlord. The Units are primarily accessed via a car park to the south of Unit C which comprises a number of parking spaces in which the Second Claimant is granted the right to park under Schedule 2 of the Unit C Lease. Other parking spaces and loading areas located to the east of Unit C and to the west and north of Unit J are also used in connection with the Units. The Second Claimant's title to Units C and J are registered at HM Land Registry under title numbers BD154446 and BD154447.

7. The Luton Site is shown edged yellow on Plan 2 annexed to these Re-Amended Particulars of Claim. The areas demised to the Second Claimant are shown hatched red. The strip separating Units C and J, ~~and~~ the car park and loading area to the south and east of Unit C, and the car park and loading area to the west and north of Unit J is shown shaded and hatched blue.

8. The Luton Site manufactures Foreign Object Debris detection systems that are used for airfield management purposes.

Docusign Envelope ID: 38A9D259-CCEA-4E54-92FE-B0189B811B63

9. The Third Claimant is the registered leasehold owner of the site known as Moog Reading Limited, 30 Suttons Business Park, Reading, Berkshire, RG6 1AW ("the Reading Site"). The Reading Site comprises two conjoined warehouse units, units 29 and 30 together with parking spaces. Title to the demised premises is registered at HM Land Registry under title numbers BK501720 and BK501808.

10. The warehouse units are separated from the demised car parking to the north of the units by an estate road and circulation spaces/forecourt and from the demised car parking to the south of the units by an estate road. Those areas are not demised to the Third Claimant but are common parts of the Business Park over which the Third Claimant enjoys rights in connection with the permitted user of the demised premises and in common with others. The Reading Site is shown edged yellow on Plan 3 annexed to these Re-Amended Particulars of Claim. The areas demised to the Third Claimant are shown hatched red. The common parts over which the Third Claimant enjoys rights in connection with the use of the demised premises are shown shaded and hatched blue.

11. The Reading Site is used for the manufacture of slip rings, motor controls and fibre optic components.

12. The Fourth Claimant is the leasehold owner of the site known as Moog Aircraft Group Tewkesbury, Ashchurch, Tewkesbury, Gloucestershire, GL20 8NA, the title to which is registered at HM Land Registry under title number GR476429 ("the Tewkesbury Aircraft Site"). The Tewkesbury Aircraft Site is shown edged red on Plan 4 annexed to these Re-Amended Particulars of Claim.

13. The Tewkesbury Aircraft Site comprises a large building, with both warehouse and office premises, together with car parking and circulation space. It is enclosed by security fencing. The site is used for the manufacture of electro-hydraulic servo valves and braking and steering control manifolds.

14. The Fourth Claimant is also the leasehold owner of the site known as Moog Industrial Group, Ashchurch Parkway, Tewkesbury, Gloucestershire, GL20 8TU, title to which is registered at HM Land Registry under title number GR395822 ("the Tewkesbury Industrial Site"). The Tewkesbury Industrial Site is shown edged red on Plan 5 annexed to these Re-Amended Particulars of Claim.

Docusign Envelope ID: 38A9D259-CCEA-4E54-92FE-B0189B811B63

15. The Tewkesbury Industrial Site comprises a building with office and factory use with parking and circulation spaces. The site is used for the manufacture of servovalves, actuators and control system manifold assemblies for a variety of industrial end markets.

16. In these Re-Amended Particulars of Claim, the Wolverhampton Site, the Luton Site, the Reading Site, the Tewkesbury Aircraft Site and the Tewkesbury Industrial Site are referred to collectively as "the Moog Sites" where appropriate.

17. The claim is not for injunctive or other relief in relation to any residential property.

THE THREAT

18. Palestine Action is a pro-Palestine direct action protest group which describes its aims as being "to take direct action against Israel's arms trade in Britain[1]" and to target property and premises belonging to corporate actors seen as aiding and abetting violations of international law by Israel against the Palestinian people. It is a proscribed organisation under the Terrorism Act 2000 ("the Act") with effect from 5th July 2025.

19. Palestine Action or individuals associated with, or espousing causes similar to those of Palestine Action, have undertaken unlawful direct action against a number of companies who are alleged to have supplied aircraft parts or equipment for ultimate use by Israel and/or the Israel Defense Forces ("the IDF") as an end user.

20. In particular, a website entitled "Declassified UK" has in the past published articles naming companies with operational sites situated in the UK which are alleged to supply components to the IDF. In relation to the following companies, such publication has been associated with such unlawful direct action being taken soon afterwards against operational sites of the companies in question:

    (i) BAE Systems Plc;
    (ii) Martin-Baker Limited;
    (iii) UAV Engines Limited;

[1] Ammori v Secretary of State for the Home Department [2025] EWHC 1708 at 8.

Docusign Envelope ID: 38A9D259-CCEA-4E54-92FE-B0189B811B63

(iv) Instro Precision Limited; and

(v) Permoid Industries Limited.

21. On 10 July 2025, the Declassified UK website published an article under the headline "Israeli fighter pilots training with UK equipment", including, but not limited to, allegations that:

(i) "Moog" had designed the flight control system for the "M-346 Lavi", which was described as "a high-performance aircraft designed to train Israeli pilots to fly advanced fighter jets including the F-16 and F-35" and provides maintenance services for the aircraft;

(ii) F-16 fighter jets had been used by Israeli forces last year "to bomb a residential compound in Gaza housing UK charity Medical Aid for Palestinians, injuring four British doctors" and that "F-35s have also been used to commit war crimes in Gaza, including an airstrike on a designated safe zone which killed 90 people";

(iii) "In addition to supplying parts for the M-346 Lavi, Moog has contributed to the global F-35 programme";

(iv) "Moog has sent at least ten shipments to Hatzerim airbase since December 2024"; and

(v) Specifically, the First Claimant had "sent at least ten shipments to Israel's Hatzerim airbase since December", and "was on the most recent list of UK-based companies which have received arms export licences for the international F-35 programme."

22. The First Claimant is also identified on the Campaign Against Arms Trade ("CAAT") website as a company which makes components for F-35s and as a company which holds an "Israeli military export licence". A search for "Moog" on the CAAT website identifies the addresses of two of the Moog Sites.

Docusign Envelope ID: 38A9D259-CCEA-4E54-92FE-B0189B811B63

23. In the early hours of Tuesday 26th August 2025, four individuals claiming to be associated with a group called "Palestinian Martyrs for Justice" broke into the Wolverhampton Site by ramming a vehicle into the front gates and then driving through an internal automatic barrier into the Logistics Entrance to the site. Thereafter, they climbed onto the roof of the main building, causing significant damage to the building and solar panels installed upon its roof and considerable disruption to the First Claimant's business operations.

24. By reason of the foregoing facts and matters, some or all of the Moog Sites are highly likely to be the subject of unlawful direct action; and, further or alternatively, the Claimants reasonably so apprehend.

CAUSES OF ACTION

25. The Claimants apprehend that, unless restrained by the Court, persons unknown having sympathies for causes similar to those espoused by (among others) Palestine Action will conduct themselves in such a way as to amount to trespass and/or nuisance at one or more or all of the Moog Sites.

26. Members of the public have no consent or permission to enter upon the Moog Sites. The Claimants have not given any permission, consent or licence to any person to enter onto the Moog Sites other than in connection with the lawful operation of those sites and, in respect of the Wolverhampton Site, for the exercise of the rights to Centrica under the Airspace Lease. In particular, the Claimants have not given any permission, consent or licence to members of the public to enter onto the Moog Sites for the purpose of protest, direct action or other protest activity whether associated with the causes espoused by (among others) Palestine Action or otherwise.

27. Accordingly:

    (i) entry onto, occupation of, or remaining on the Moog Sites, or any of them; or

Docusign Envelope ID: 38A9D259-CCEA-4E54-92FE-B0189B811B63

(ii) climbing, 'locking on' (by whatever means) to any part thereof, causing damage such as by smashing of windows or external equipment, spray-painting, pouring, depositing, throwing or affixing anything; or

(iii) in respect of the Wolverhampton Site and the Tewkesbury Aircraft Site (which are enclosed by their own fences) the climbing, cutting or spray-painting of, the "locking on" to (by whatever means) or pouring, depositing, throwing, or affixing anything to the fencing surrounding those sites,

would therefore constitute a trespass, which the Claimants are entitled to injunctive relief to restrain.

28. Further, the Claimants seek injunctive relief to restrain:

(i) The obstruction or interference, or attempted obstruction or interference, of access to or egress from the Moog Sites, with or without vehicles, by the Claimants, their agents, employees, contractors, customers, suppliers or other licensees; and

(ii) the interference with any of the services serving the Moog Sites, including but not limited to water and/or sewerage pipes.

Any such interference would constitute a trespass, alternatively a nuisance and the relief sought is necessary and proportionate in order to give effective protection to the Claimants' rights as landowners in respect of the Moog Sites.

29. The Second Claimant also seeks injunctive relief in respect of the area shown shaded and hatched blue on Plan 2, being (i) the strip of land separating the Units and (ii) ~~the car parking spaces and loading bays adjoining Unit C which is used with to access~~ parking areas and loading bays used with the Units. It is not asserted in these proceedings that the Second Claimant is the person entitled to sufficient possession or control of those areas to maintain a cause of action in trespass in relation thereto. However:

Docusign Envelope ID: 38A9D259-CCEA-4E54-92FE-B0189B811B63

(i) the relief claimed in relation the areas shown shaded and hatched blue on Plan 2 is no more than is necessary and proportionate in order to give effective protection to its rights as landowner to restrain trespass on the Luton Site;

(ii) further or alternatively, such relief is required in order to restrain acts of nuisance, or threatened nuisance, within the areas shaded and hatched blue which would interfere with the Second Claimant's use and enjoyment of the Luton Site or which would threaten to do so.

30. On the like basis, the Third Claimant also seeks injunctive relief in respect of the areas shown shaded and hatched blue on Plan 3, being the estate road and/or circulation spaces/forecourt/additional car parking spaces separating the warehouse units from the demised car parking spaces within the Reading Site.

HUMAN RIGHTS

31. Reliance by the Defendants of rights of freedom of expression and / assembly under Articles 10 and/or 11 of the European Convention of Human Rights would not provide a defence in the particular circumstances of this case.

THE RELIEF SOUGHT

32. The Claimants therefore seek~~s~~ the following Orders:

(i) An order restraining the First Defendants from:

(1) entering, occupying or remaining upon or damaging the land and premises shown edged red on Plan 1 being the Wolverhampton Site 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);

Docusign Envelope ID: 38A9D259-CCEA-4E54-92FE-B0189B811B63

(2) obstructing or interfering with or attempting to obstruct or interfere with access to or egress from the Wolverhampton Site, with or without vehicles, by the First Claimant, its agents, employees, contractors, customers, suppliers, or other licencees.

(ii) An order restraining the Second Defendants from:

(1) entering, occupying or remaining upon or damaging the land and premises shown edged yellow on Plan 2 being the Luton Site (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);

(2) obstructing or interfering with or attempting to obstruct or interfere with access to or egress from the Luton Site, with or without vehicles, by the Second Claimant, its agents, employees, contractors, customers, suppliers or other licencees.

(iii) An order restraining the Third Defendants from:

(1) entering, occupying or remaining upon or damaging the land and premises shown edged yellow on Plan 3 being the Reading Site (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);

(2) obstructing or interfering with or attempting to obstruct or interfere with access to or egress from the Reading Site, with or without vehicles, by the Third Claimant, its agents, employees, contractors, customers, suppliers or other licencees.

Docusign Envelope ID: 38A9D259-CCEA-4E54-92FE-B0189B811B63

(iv) An order restraining the Fourth Defendants from:

(1) entering, occupying or remaining upon or damaging the land and premises shown edged red on Plan 4 being the Tewkesbury Aircraft Site 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);

(2) obstructing or interfering with or attempting to obstruct or interfere with access to or egress from the Tewkesbury Aircraft Site, with or without vehicles, by the Fourth Claimant, its agents, employees, contractors, customers, suppliers or other licencees.

(v) An order restraining the Fifth Defendants from:

(1) entering, occupying or remaining upon or damaging the land and premises shown edged red on Plan 5 being the Tewkesbury Industrial Site (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);

(2) obstructing or interfering with or attempting to obstruct or interfere with access to or egress from the Tewkesbury Industrial Site, with or without vehicles, by the Fourth Claimant, its agents, employees, contractors, customers, suppliers or other licencees.

(vi) An order restraining the Defendants from interfering or attempting to interfere with services serving the Moog Sites including, but not limited to, water and/or sewerage pipes;

Docusign Envelope ID: 38A9D259-CCEA-4E54-92FE-B0189B811B63

(vii) Further or other relief as the Court sees fit; and

(viii) Costs.

I believe that the facts stated in this Re-Amended Particulars of Claim 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 by:
Elwira Kelly
92C7F87347624E7...

Signed .....

Elwira Kelly

DATED this 7 day of October 2025.

Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A

N244

Application notice

Take notice that an appointment to fix a date for this/Application/Hearing has been made for
DATE: 10th August 2026 AT:11am
This listing appointment will take place via email, please e-file a letter with your dates to avoid/or availability prior to the above appointment. Alternatively, you can send them via email to Chanceryjudgeslisting@justice.gov.uk.
However, if you do wish to attend please email us beforehand and a listing officer will be available to conduct the listing appointment in person at:
GROUND FLOOR, THE ROLLS BUILDING, 7 ROLLS BUILDINGS, LONDON, EC4A 1NL

HIGH COURT OF JUSTICE
30 Jul 2026
THE BUSINESS & PROPERTY COURTS OF ENGLAND & WALES

Name of court High Court of Justice Chancery Division	**Claim no.** PT-2025-000910
Fee account no. (if applicable)	**Help with Fees Ref. no.** (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	28 July 2026

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?

Pursuant to paragraph 7 of the order of the Honourable Mr Justice Thompsell dated 6 October 2025 and granting injunctive relief to the Claimants (the **"Injunction Order"**), the Claimants herewith apply to list a hearing at which the review of the Injunction Order will take place (the **"Review Hearing"**), with a time estimate of 2 ½ hours.

As the listing of the Review Hearing is a procedural matter, this application is made without notice pursuant to paragraph 15.36 of the Chancery Guide.

4. Have you attached a draft of the order you are applying for? ☐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? 2 Hours 30 Minutes

☐Yes ☒No

7. Give details of any fixed trial date or period: Review of Injunction Order to be applied for on or before 6 October 2026

8. What level of Judge does your hearing need? High Court Judge

9. Who should be served with this application? Please see below

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

In an application of today's date, the Claimants are seeking permission to serve the proposed Sixth to Ninth Defendants with an application to join them to proceedings (and other documents in the claim). The Claimants would propose to serve this application with those documents if the order sought is made.
The Claimants will notify the First to Fifth Defendants of this application in accordance with Paragraph 10 of the Order of the Honourable Mr Justice Thompsell dated 6 October 2025 (sealed on 8 October 2025)

Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A

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.

Pursuant to paragraph 7 of the Injunction Order (as enclosed), the injunction as set out in the Injunction Order is to be reviewed annually on each anniversary of the Injunction Order (or as close to this date as is convenient having regard to the Court's list).

In accordance with paragraph 7 of the Injunction Order, the Claimants therefore apply for a hearing to be listed at which the Injunction Order will be reviewed (the **"Review Hearing"**). The Review Hearing is to be listed with a time estimate of 2 ½ hours.

As this application relates to listing, the Claimants submit that this application can be dealt with on paper pursuant to CPR r.23.8(1)(c). This application is made without notice pursuant to paragraph 15.36 of the Chancery Guide.

The Claimants will contact the court with dates to avoid for the Review Hearing upon filing this application.

Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A

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

Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A

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:
Elwira J. Kelly
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
28	07	2026

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

Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A

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

WV9 5GB

If applicable

Phone number

Fax phone number

DX number

Your Ref.

Email

MoogLegal@moog.com

Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A

SCHEDULE 1 – LIST OF DEFENDANTS

(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 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 OR SABOTAGE 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

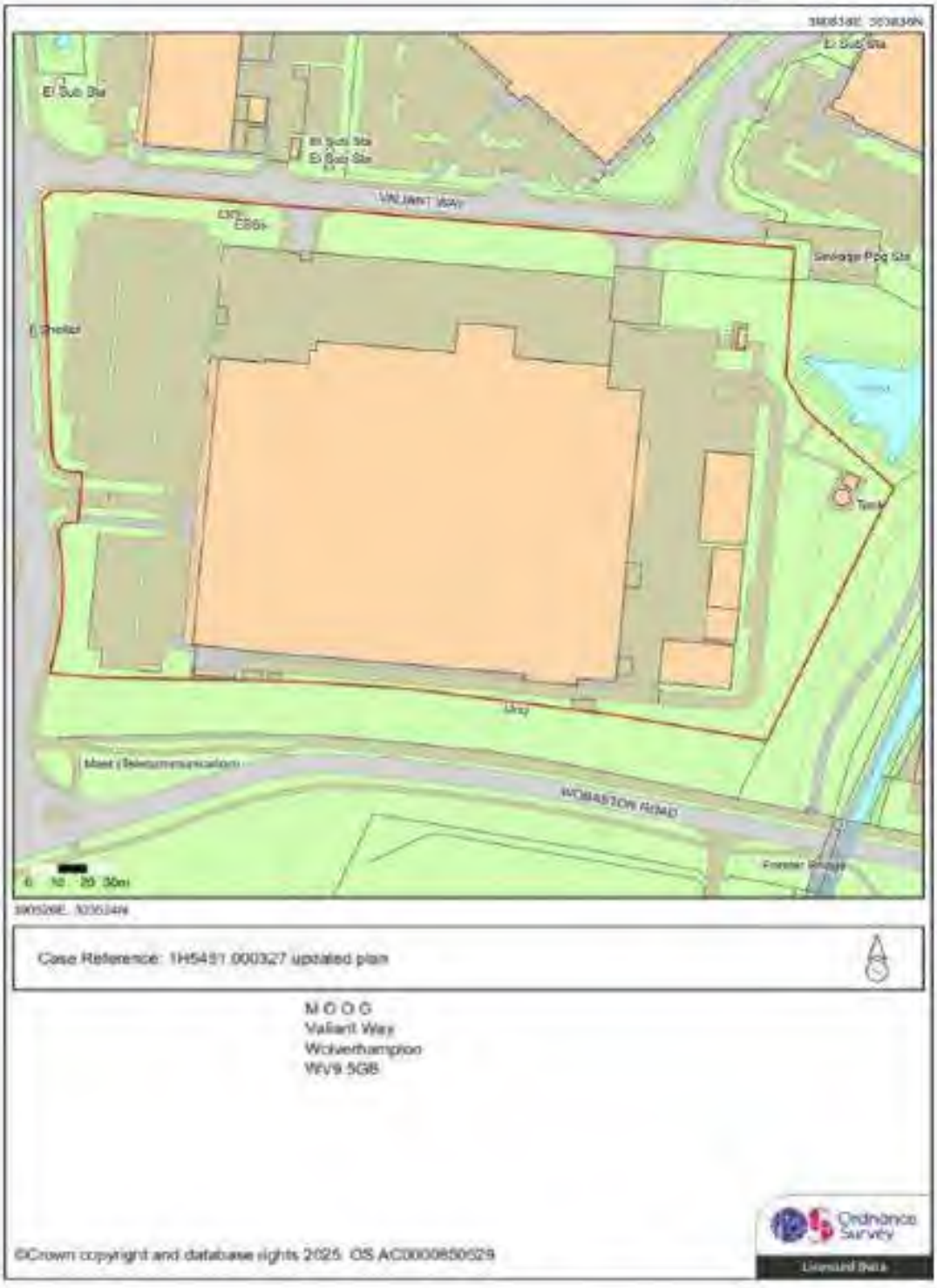
(4) PERSONS UNKNOWN WHO FOR THE PURPOSE OF PROTEST OR SABOTAGE ENTER OCCUPY OR REMAIN ON, OR DAMAGE, THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 4 BEING MOOG AIRCRAFT GROUP TEWKSBURY, ASHCHURCH, TEWKESBURY, GLOUCESTERSHIRE GL20 8NA, OR WHO OBSTRUCT AND/OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT AND/OR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

Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A

SCHEDULE 2 – PLANS

Plan 1



Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A

H.M. LAND REGISTRY

TITLE NUMBER

ED154447

ORDNANCE SURVEY PLAN REFERENCE: TL 1121

SECTION C

SCALE 1/1250

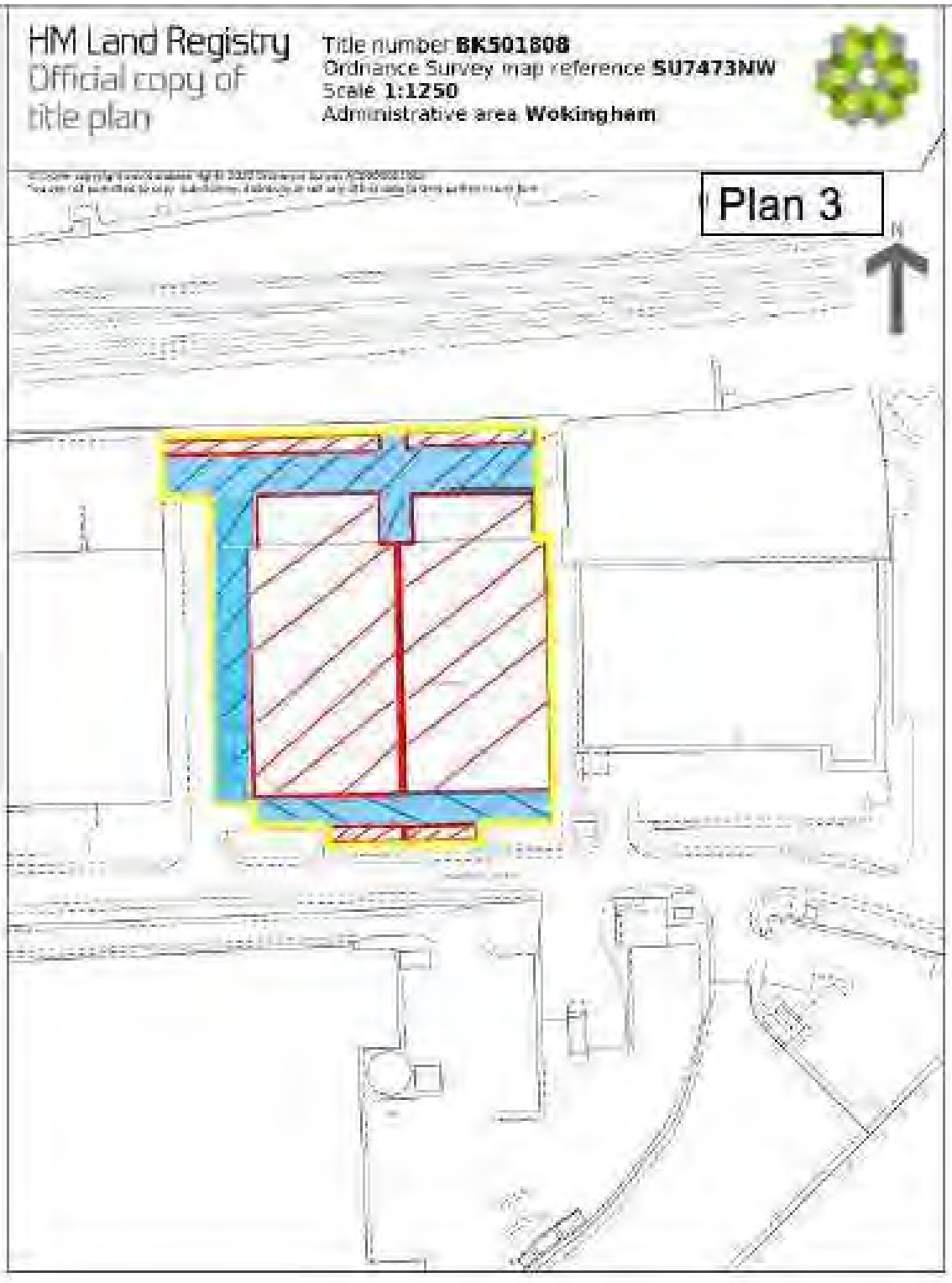
Plan 2

Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A

HM Land Registry
Official copy of
title plan

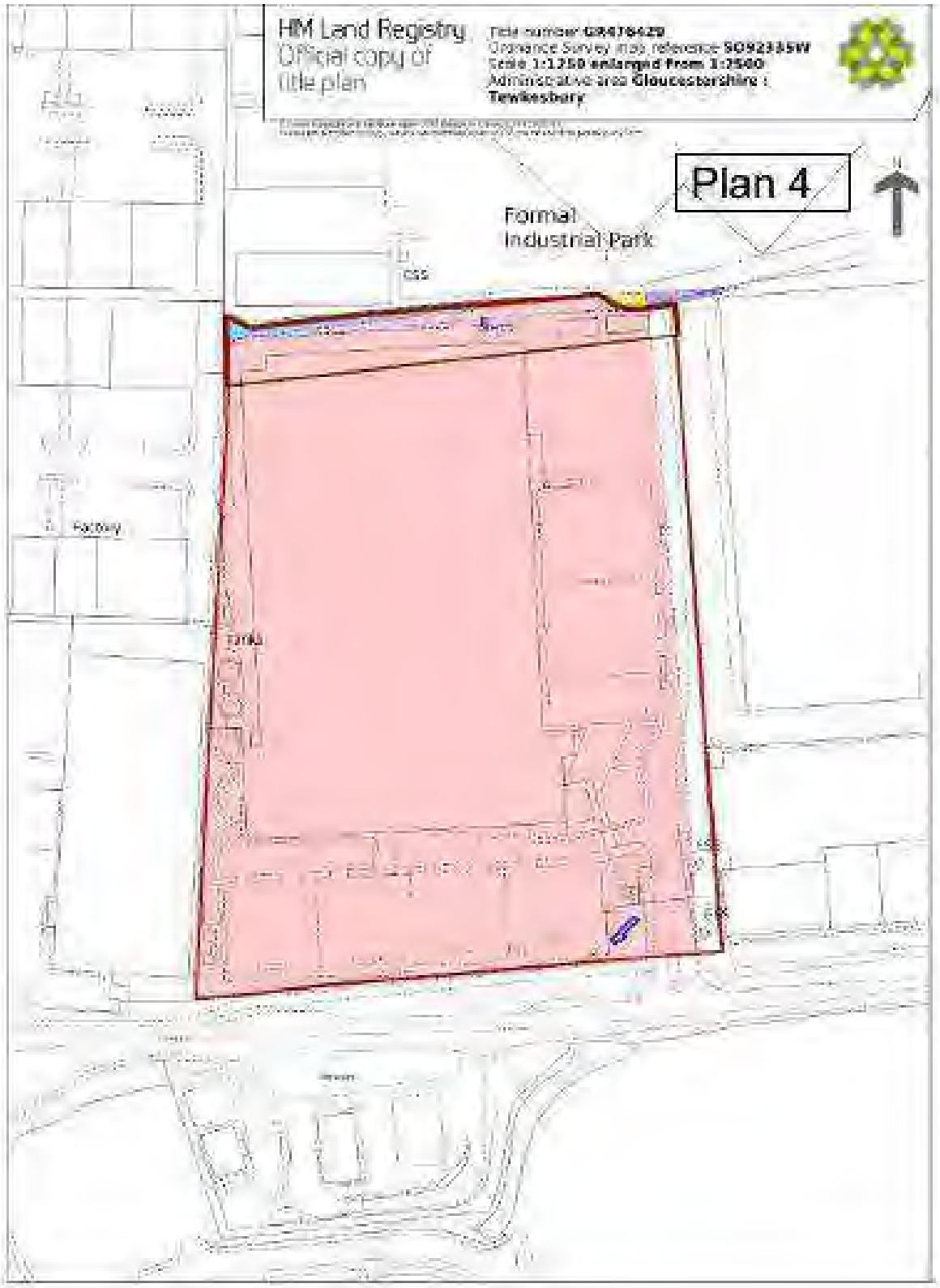
Title number **BK501808**
Ordnance Survey map reference **SU7473NW**
Scale **1:1250**
Administrative area **Wokingham**

Plan 3



This official copy is incomplete without the preceding notes page.

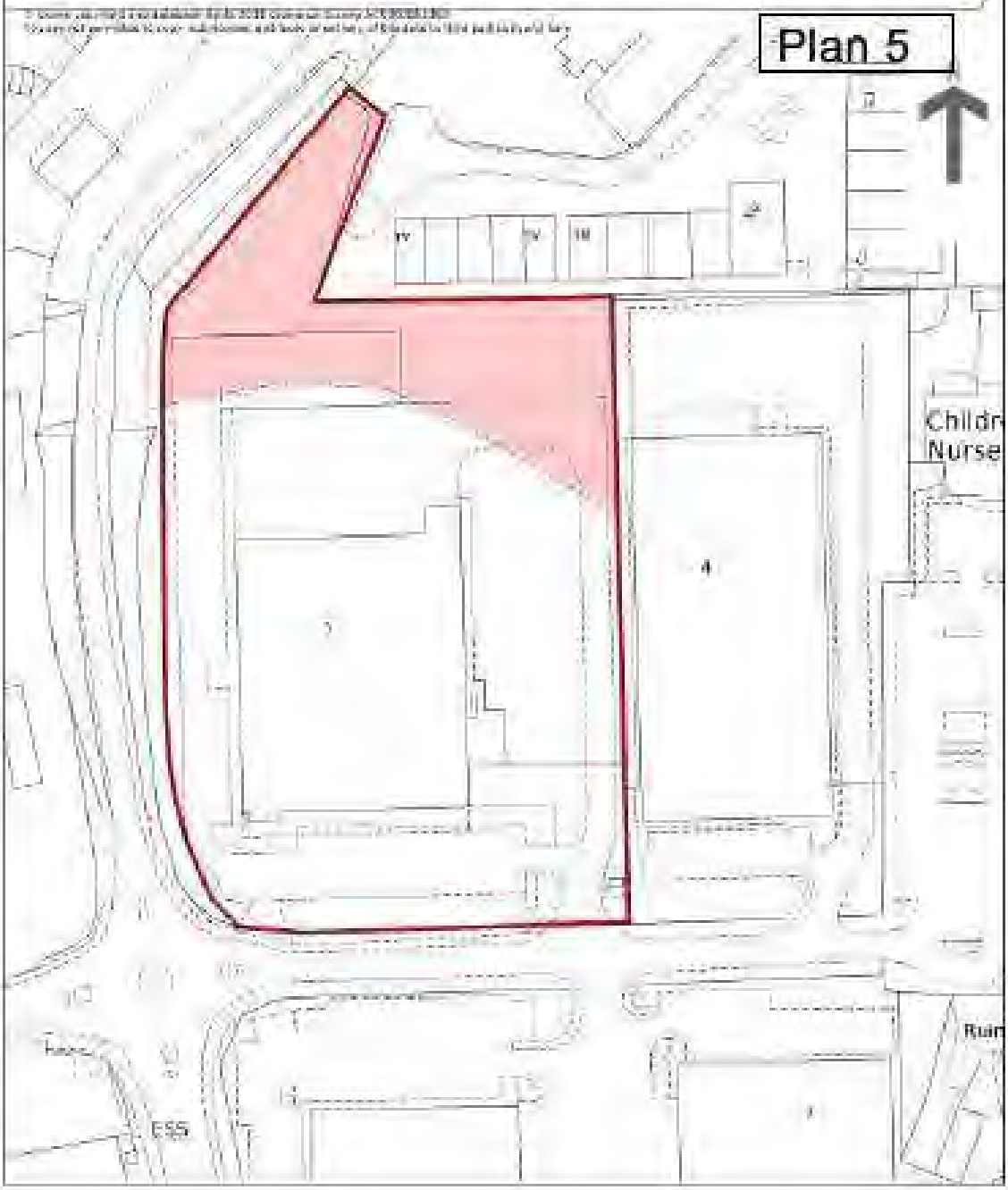
Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A



Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A

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**



This official copy is incomplete without the preceding notes page.

Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A



IN THE HIGH COURT OF JUSTICE **Claim No: PT-2025-000910**

CHANCERY DIVISION

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 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 (FIRST DEFENDANT)

(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 (SECOND DEFENDANT)

(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,

Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A

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 (THIRD DEFENDANT)

(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 (FOURTH DEFENDANT)

(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 (FIFTH DEFENDANT)

Defendants

ORDER

PENAL NOTICE

IF YOU ARE A PERSON WITHIN THE CATEGORIES OF DEFENDANTS MENTIONED ABOVE ("DEFENDANTS") AND DISOBEY THIS ORDER OR INSTRUCT 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 TO BREACH THE TERMS OF

Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A

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

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 Thompsell on 6 October 2025

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

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

AND UPON interim injunctive relief having been granted in part by the Honourable Mr Justice Meade on 5 September 2025

AND UPON the Claimants seeking continuation of the interim injunctive relief granted on 5 September 2025 and further injunctive relief preventing the obstruction of or interference with access, as detailed in its application for injunctive relief of 4 September 2025 and draft Order provided therewith

AND UPON READING the Witness Statement of Elwira Kelly dated 4 September 2025, the Second Witness Statement of Elwira Kelly dated 5 September 2025, and the Third Witness Statement of Elwira Kelly dated 1 October 2025, permission to rely on that Third Witness Statement having been granted at the hearing on 6 October 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

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

Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A

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) deliberately and with knowledge of this Order obstruct or interfere with or attempt to obstruct or interfere with access to or egress from the land and premises shown edged red on Plan 1 with or without vehicles by the First Claimant, its agents, employees, contractors, customers, suppliers or other licencees;

(iii) 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) deliberately and with knowledge of this Order obstruct or interfere with or attempt to obstruct or interfere with access to or egress from the land and premises shown edged yellow on Plan 2 with or without vehicles by the Second Claimant, its agents, employees, contractors, customers, suppliers, or other licencees;

Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A

(iii) 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) deliberately and with knowledge of this Order obstruct or interfere with or attempt to obstruct or interfere with access to or egress from the land and premises shown edged yellow on Plan 3 with or without vehicles by the Third Claimant, its agents, employees, contractors, customers, suppliers, or other licencees;

(iii) 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;

Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A

(ii) deliberately and with knowledge of this Order obstruct or interfere with or attempt to obstruct or interfere with access to or egress from the land and premises shown edged red on Plan 4 with or without vehicles by the Fourth Claimant, its agents, employees, contractors, customers, suppliers, or other licencees;

(iii) 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) deliberately and with knowledge of this Order obstruct or interfere with or attempt to obstruct or interfere with access to or egress from the land and premises shown edged red on Plan 5 with or without vehicles by the Fourth Claimant, its agents, employees, contractors, customers, suppliers, or other licencees;

(iii) 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.

Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A

REVIEW

7. The injunction set out at paragraphs 1 to 6 of this Order shall be reviewed annually on each anniversary of the Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 2 ½ hours. The Claimants are permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton Arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the hearing. The injunction set out at paragraphs 1 to 6 of this Order shall lapse at 4pm on the anniversary of the order (or as the case may be the latest annual review) unless, before then, the Claimants have applied for the review to take place.

SERVICE AND NOTIFICATION

8. Service of this Order is dispensed with, pursuant to CPR 6.28 and 81.4(2)(c).

9. 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 including a QR code linking to the website in paragraph 9(i) above. 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 12 below) shall be replaced with notices in A2 size as soon as reasonably practicable.

Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A

10. 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.

11. Notification of any further documents to the Defendants may be effected by carrying out the steps set out in paragraphs 10(i) and 10(ii) only.

12. In respect of paragraphs 9 and 10 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.

13. For the avoidance of doubt, in respect of the steps referred to at paragraphs 9(ii), 9(iii), and 10(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.

14. For the purposes of paragraphs 9(ii), 9(iii) and 10(ii), "prominent location" in relation to each Site means:

(i) All of the locations shown marked on the Plans exhibited to the Third Witness Statement of Elwira Kelly including, for the avoidance of doubt, those locations at the sites shown edged yellow on Plan 2 ("the Luton Site") and edged yellow on Plan 3 ("the Reading Site") where additional notices were proposed to be erected as detailed at paragraph 4(e) of the Third Witness Statement of Elwira Kelly;

(ii) At either side of all entrances to the perimeter of each of the Sites;

(iii) On the perimeter fencing for those Sites which are in whole or in part enclosed by a perimeter fence;

Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A

(iv) At the Reading Site, to the extent not already provided pursuant to paragraph 14(i) to (iii), at the entrance points at the south-east, south-west, north-east and north-west of the boundary of the Site shown edged yellow on Plan 3;

(v) At the Luton Site, to the extent not already provided pursuant to paragraph 14(i) to (iii) above, at the entrance to the parking area and loading bay to Unit J at the north-west of the Site, the western end of the walkway between Units C and J and at the entrance to the car parking area to the south of Unit C, each of which are shown hatched blue on Plan 2.

(vi) In the event that the Second Claimant is unable to display copies of the Order and/or warning notices at each of the locations at the Luton Site as provided for by this paragraph of this Order, the Claimants may apply to Court for directions and/or variation of these requirements (but any such application may be made without notice / notification pursuant to paragraph 10).

VARIATION

15. The Claimants have permission to amend the Claim Form and Amended Particulars of Claim to amend the description of the Defendants in each case by adding after the words "Persons unknown who for the purpose of protest" the words "or sabotage". The Claimants shall notify any persons who may be affected by this amendment by:

(i) Uploading a copy of the amended Claim Form and re-amended Particulars of Claim on to the following website: www.moog.co.uk/injunction; and

(ii) Including reference to this amendment and a link to the website where the amended documents can be found in the warning notices referred to at paragraph 9(iii) above.

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

Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A

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.

FURTHER EVIDENCE

19. The Claimants have permission to rely on the Third Witness Statement of Elwira Kelly dated 1 October 2025.

COSTS

20. Costs reserved.

COMMUNICATIONS WITH THE CLAIMANTS

21. The Claimants' contact details are:

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

(2) mooglegal@moog.com.

Dated: 6 October 2025

Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A

SCHEDULE 1 – UNDERTAKINGS

1. 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.

Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A

SCHEDULE 2 – PLANS

Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A

Plan 1



Case Reference: 1H5401 000327 updated plan

MOOG
Valiant Way
Wolverhampton
WV9 5GB

©Crown copyright and database rights 2025. OS AC0000850529
Ordnance Survey
Licensed Data

Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A

H.M. LAND REGISTRY

TITLE NUMBER

ED154447

ORDNANCE SURVEY PLAN REFERENCE TL 1121 SECTION C Scale 1/1250

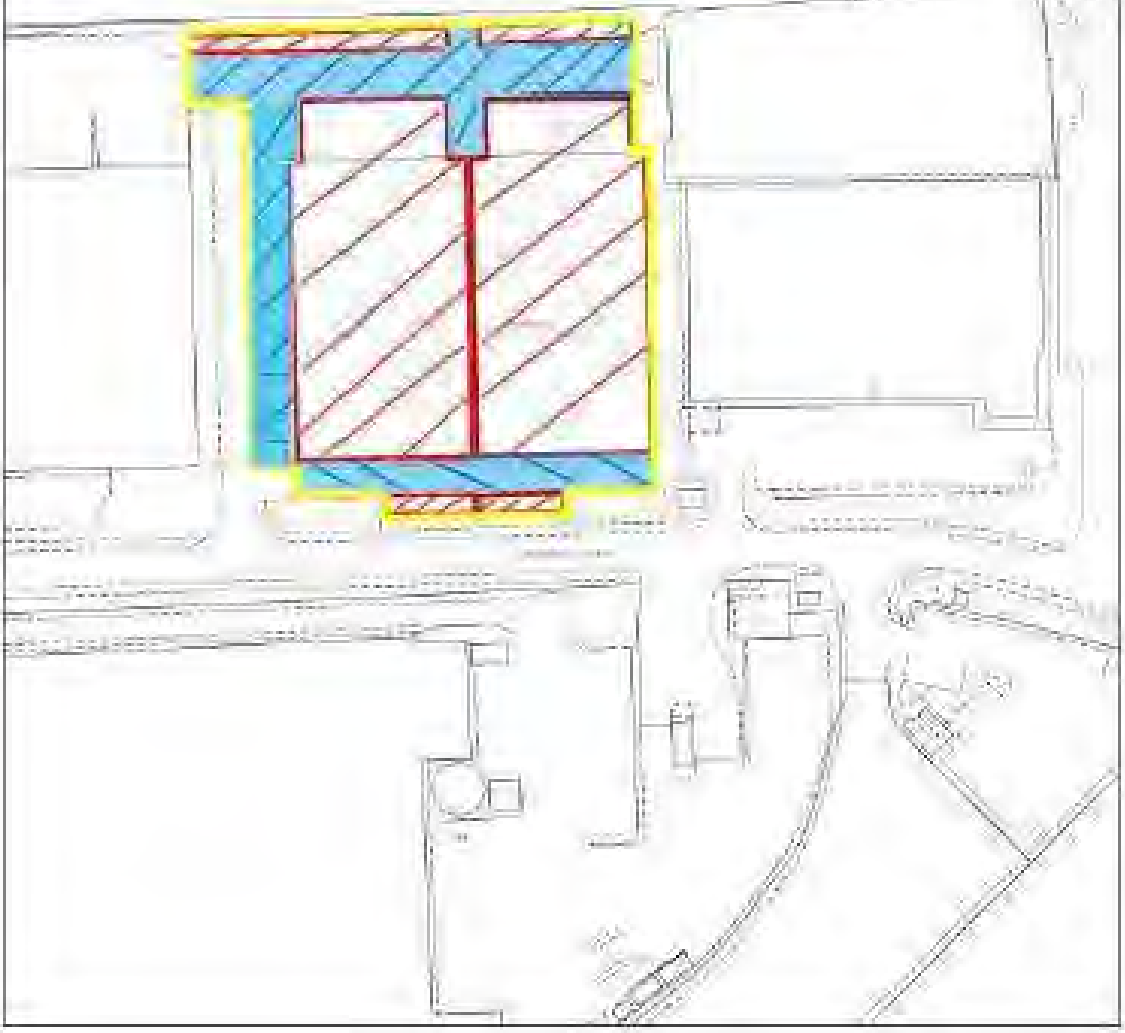
Plan 2

Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A

HM Land Registry
Official copy of title plan

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

Plan 3



This official copy is incomplete without the preceding notes page.

Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A

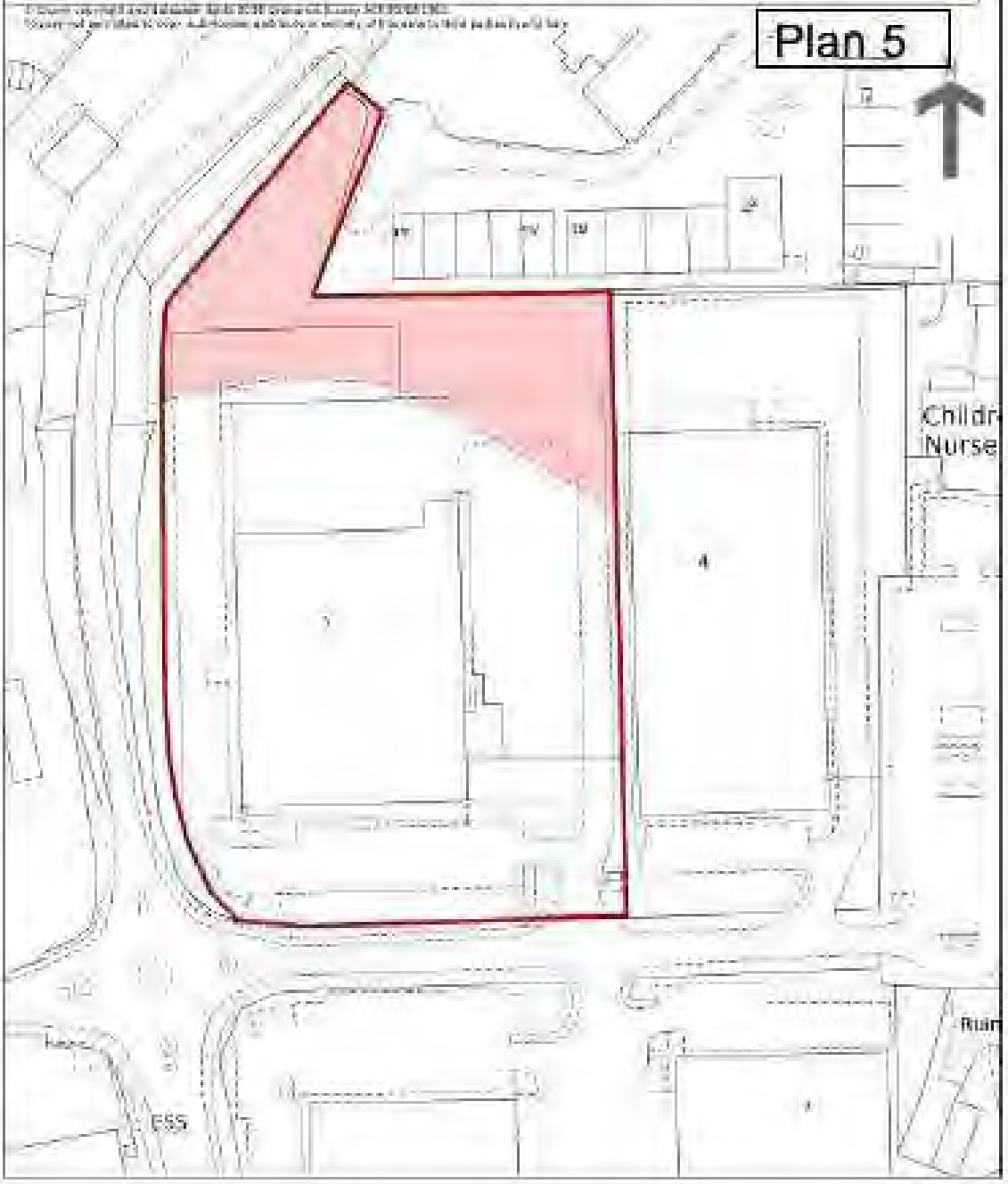


Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A

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**

Plan 5



Title official copy is incomplete without the preceding notes page.

Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A

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 6 October 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 OR SABOTAGE 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. **DELIBERATELY AND WITH KNOWLEGDE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 1**
3. **INTERFERE OR ATTEMPT TO INTERFERE WITH ANY OF THE SERVICES SERVING THE LAND AND PREMISES SHOWN EGDED 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 (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest) can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com

Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A

Plan 1



Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 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

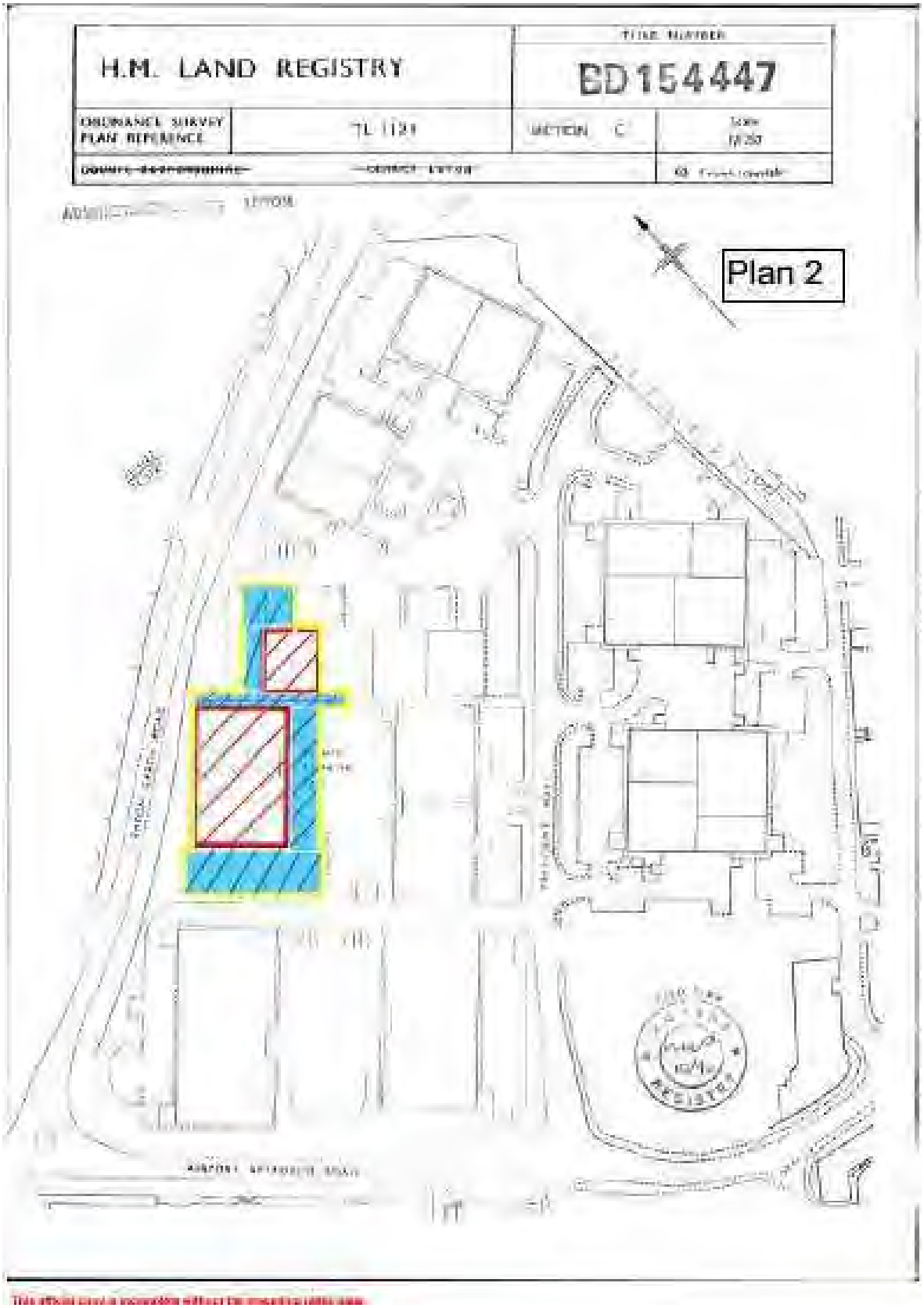
The injunction means you may not:

1. **FOR THE PURPOSE OF PROTEST OR SABOTAGE 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. **DELIBERATELY AND WITH KNOWLEDGE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED YELLOW ON PLAN 2**
3. **INTERFERE OR ATTEMPT TO INTERFERE WITH ANY OF THE SERVICES SERVING THE LAND AND PREMISES SHOWN EGDED 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 (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest)can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com

Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A



Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 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 OR SABOTAGE 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. **DELIBERATELY AND WITH KNOWLEGDE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED YELLOW ON PLAN 3**
3. **INTERFERE OR ATTEMPT TO INTERFERE WITH ANY OF THE SERVICES SERVING THE LAND AND PREMISES SHOWN EGDED 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

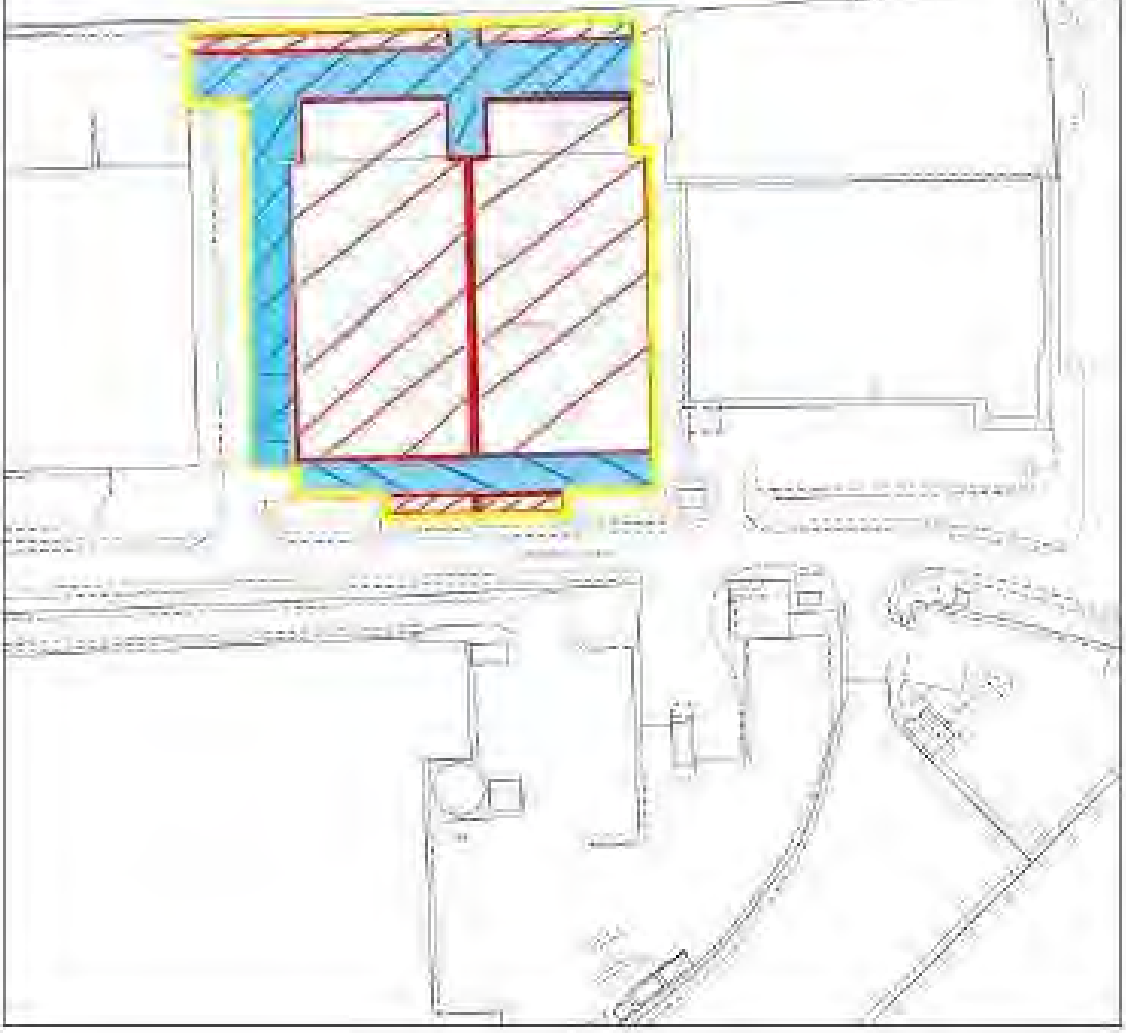
A copy of the Order and the legal proceedings to which it relates (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest)can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com

Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A

HM Land Registry
Official copy of title plan

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

Plan 3



This official copy is incomplete without the preceding notes page.

Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Aircraft Group Tewkesbury, Ashchurch, Tewkesbury, Gloucestershire, GL20 8NA.

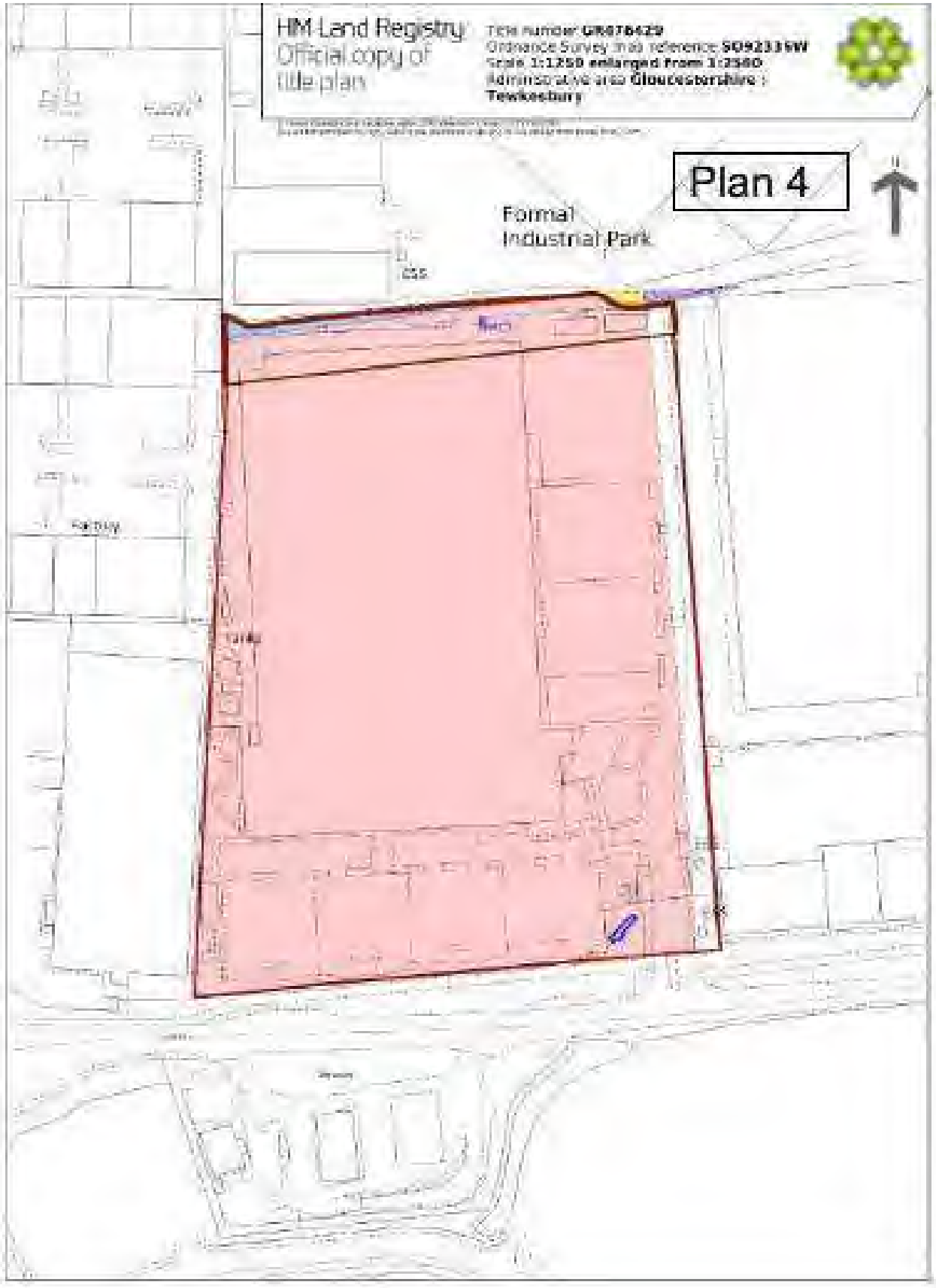
The injunction means you may not:

1. **FOR THE PURPOSE OF PROTEST OR SABOTAGE 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. **DELIBERATELY AND WITH KNOWLEGDE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 4**
3. **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 (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest) can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.

Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A



Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 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 OR SABOTAGE 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. **DELIBERATELY AND WITH KNOWLEDGE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 5**
3. **INTERFERE OR ATTEMPT TO INTERFERE WITH ANY OF THE SERVICES SERVING THE LAND AND PREMISES SHOWN EGDED RED ON PLAN 5**

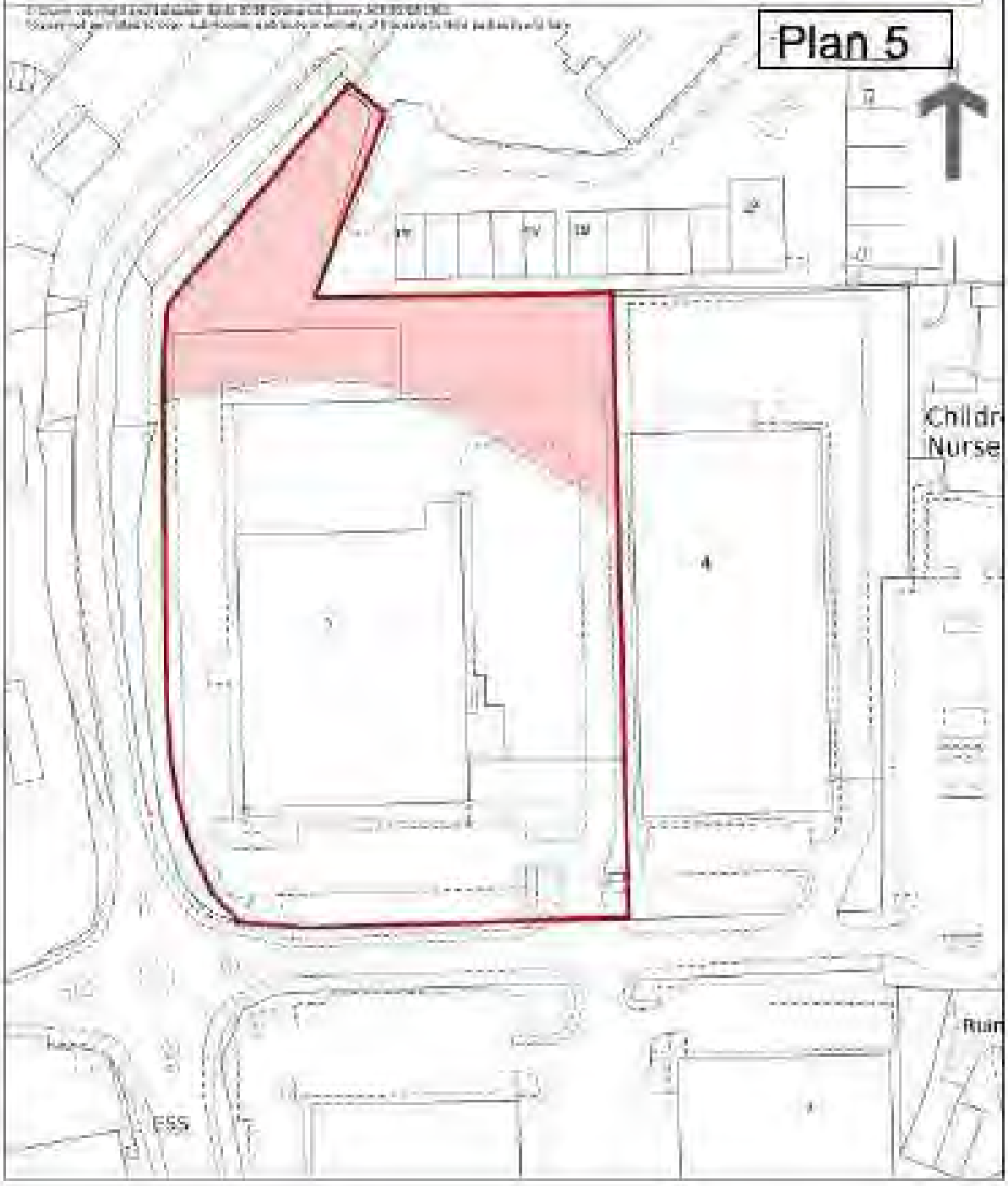
ANYONE BREACHING THE TERMS OF THIS COURT ORDER OR ASSISTING ANY OTHER PERSON IN BREACHING THE TERMS OF THIS ORDER MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE SENT TO PRISON, FINED OR HAVE THEIR ASSETS SEIZED

A copy of the Order and the legal proceedings to which it relates (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest)can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com:

Docusign Envelope ID: 32BC8477-472F-8BF9-825C-B64B8A48155A

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**



Title official copy is incomplete without the preceding notes page.

HM Courts & Tribunals Service

HM Courts & Tribunal Service
Business and Property Courts of England and Wales
Rolls Building
7 Rolls Buildings
London
EC4A 1NL
DX 160040 Strand 4
T 020 7947 6690
Email :
chanceryjudgeslisting@justice.gov.uk
www.justice.gov.uk

Email to:

[redacted]

Date: 12.08.26

Case reference: **PT-2025-000910**
Case Title: **Moog Wolverhampton Limited and others v Unknown and others**

Notice of Hearing Date

The claimant's application dated 28th July 2026 has been listed is in a 3-day window from the 18th November 2026 with a time estimate of half a day.

Information regarding the listing of this case can be found on the Justice website https://www.court-tribunal-hearings.service.gov.uk/summary-of-publications?locationId=111 at approximately 2pm on the previous working day.

Claimants to give notice of appointment to all other parties

Yours Faithfully

Amira Mohamed

Chancery Listing Office

INVESTOR IN PEOPLE

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A



Notice of hearing Application will be heard at 7 Rolls Building, London, EC4A 1NL
Date: TBH at existing hearing listed in a 3 day window from 18 November 2026
Time: 10:30am
Court: TBC

Name of court High Court of Justice Chancery Division	**Claim no.** PT-2025-000910
Fee account no. (if applicable)	**Help with Fees - Ref. no.** (if applicable)
	H W F -PT-2025-000910
Warrant no. (if applicable)	
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	28 July 2026

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 permission to serve:

(1) an application to join the (proposed) Sixth to Ninth Defendants with consequent amendments to the re-amended claim form and re-amended particulars of claim to this claim;
(2) the application for a review hearing of the injunction granted by the Honourable Mr Justice Thompsell on 6 October 2025 pursuant to paragraph 7 of that order, together with all evidence in support of the review application; and
(3) all documents previously filed by the Claimants in these proceedings

by way of alternative means pursuant to CPR 6.27. A draft Order is enclosed.

☒Yes ☐No

4. Have you attached a draft of the order you are applying for?

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?

[ ] Hours [ ] Minutes

☐Yes ☒No

7. Give details of any fixed trial date or period

Annual Review of an injunction granted on 6 October 2025. Date tbc

8. What level of Judge does your hearing need?

Judge

9. Who should be served with this application?

Please see below

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

As the Claimants are seeking permission to serve the proposed Sixth to Ninth Defendants with an application to join them to proceedings (and other documents in the claim), the Claimants would propose to serve this application with those documents if the order sought is made.
The Claimants will notify the First to Fifth Defendants of this application in accordance with Paragraph 10 of the Order of the Honourable Mr Justice Thompsell dated 6 October 2025 (sealed on 8 October 2025)

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

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.

Please see attached the Fourth Witness Statement of Elwira Kelly ("**EK4**") in support of the application.

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

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

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

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:
Elwira J. Kelly
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
28	07	2026

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

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

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

WV9 5GB

If applicable

Phone number

Fax phone number

DX number

Your Ref.

Email

MoogLegal@moog.com

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

SCHEDULE 1 – LIST OF DEFENDANTS

(FOR THE PURPOSES OF THIS APPLICATION, THE BELOW ARE REFERRED TO AS 'PERSONS UNKNOWN'):

(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 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 OR SABOTAGE 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 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

(FOR THE PURPOSES OF THIS APPLICATION, THE BELOW ARE REFERRED TO AS 'NAMED DEFENDANTS'):

(6) HANAH YUN STEVENS

(7) BEA SHERMAN (ALSO KNOWN AS FRANK SHERMAN)

(8) IAIN EVANS

(9) HISHAM ALKHAMESI

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

SCHEDULE 2 – PLANS

Plan 1



Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

H.M. LAND REGISTRY

TITLE NUMBER

BD154447

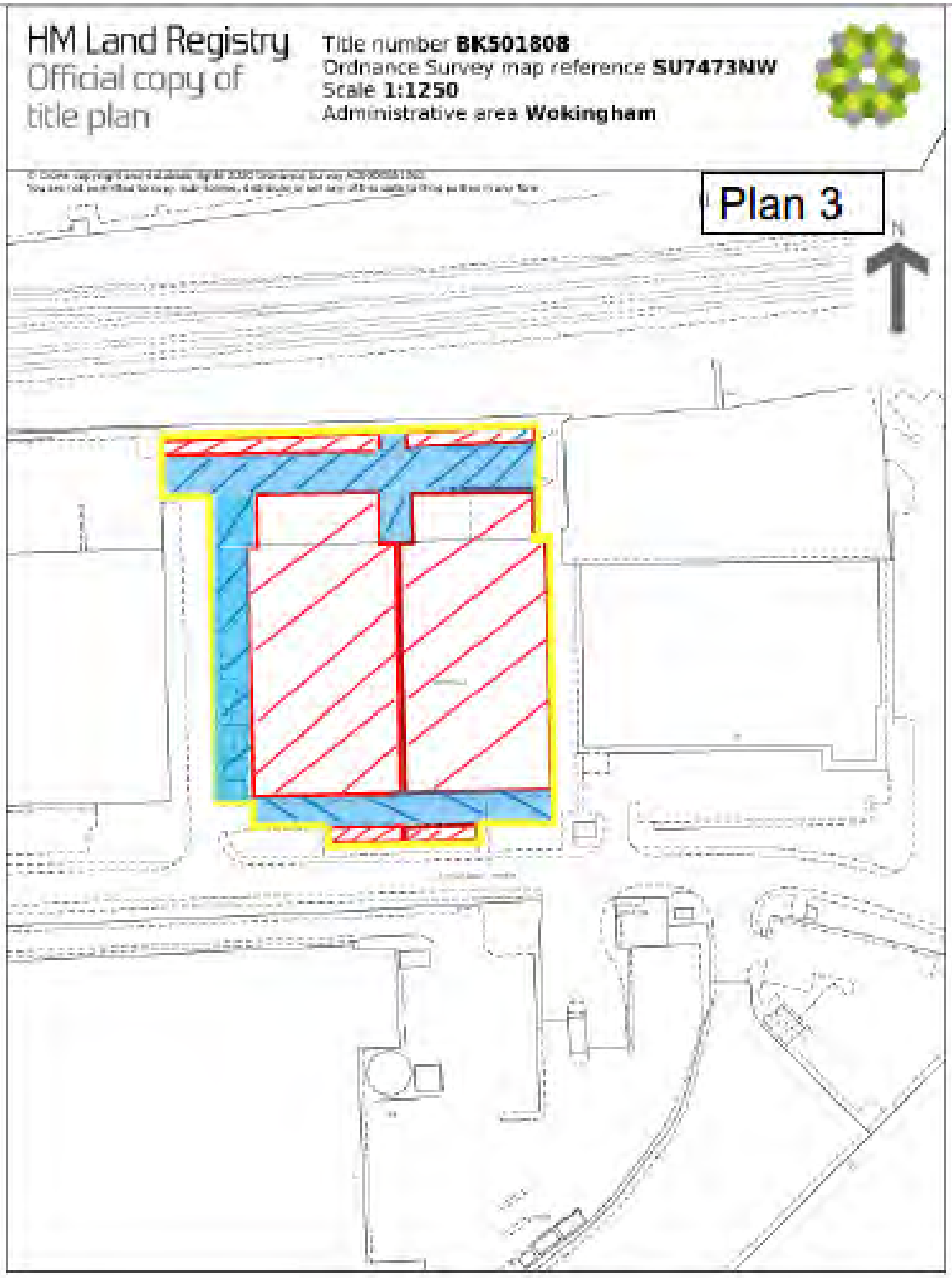
ORDNANCE SURVEY PLAN REFERENCE TL 1121 SECTION C SCALE 1/2500

Plan 2

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

HM Land Registry
Official copy of title plan

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



This official copy is incomplete without the preceding notes page.

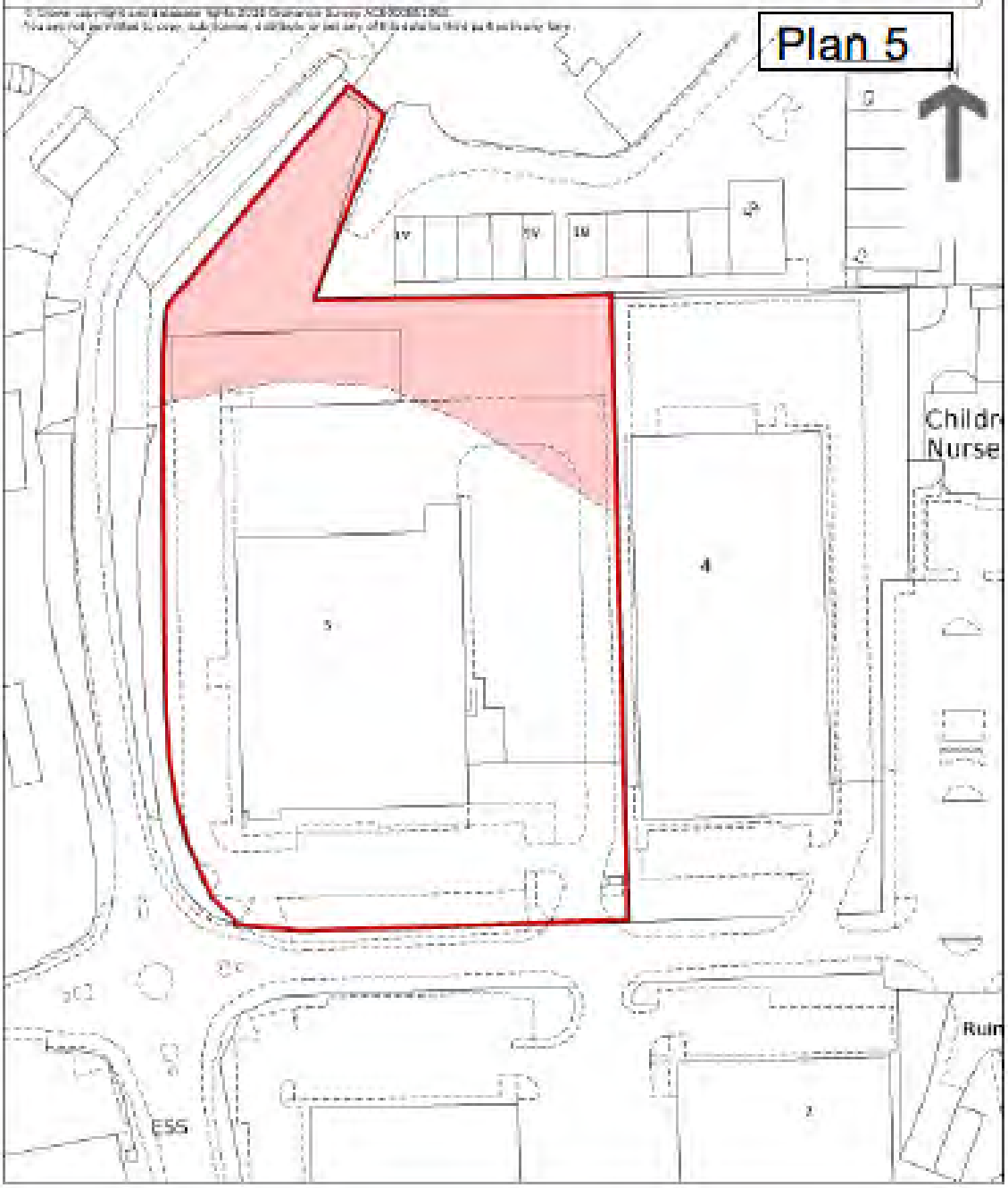
Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A



Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

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**



This official copy is incomplete without the preceding notes page.



IN THE HIGH COURT OF JUSTICE **Claim No: PT-2025-000910**

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

PROPERTY, TRUSTS AND PROBATE LIST (ChD)

Master McQuail

3 September 2026

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 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 (FIRST DEFENDANT)

(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 (SECOND DEFENDANT)

(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 (THIRD DEFENDANT)

(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 (FOURTH DEFENDANT)

(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 (FIFTH DEFENDANT)

Defendants

ORDER

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

AND UPON injunctive relief having been granted against Persons Unknown (the First to Fifth Defendants as more particularly described above) by the Honourable Mr Justice Thompsell on 6 October 2025 (the "**Injunction Order"**)

AND UPON the Court reading the fourth witness statement of Elwira Kelly dated 28 July 2026 explaining the Claimants' intention to apply to court to review the Injunction Order as provided for by Paragraph 7 of the Injunction Order (the **"Review Application"**) and to add Hanah Yun Stevens, Bea Sherman (also known as Frank Sherman), Iain Evans, and Hisham Alkhamesi as

sixth, seventh, eighth and ninth Defendants (respectively) (the **"Named Defendants"**) to the Claim and to make consequent amendments to the Re-Amended Claim Form and Re-Amended Particulars of Claim (the **"Proposed Application"**)

AND UPON the Claimants having applied by Application Notice dated 28 July 2026 for permission to serve the Proposed Application, the Review Application and other documents in the Claim on the Named Defendants by an alternative method or at any alternative place pursuant to CPR r.6.27 and r.6.15 for the reasons explained in the Fourth Witness Statement of Elwira Kelly dated 28 July 2026

IT IS ORDERED THAT:

1. Pursuant to CPR 6.27, the Claimants have permission to serve the Proposed Application, the Review Application and all evidence in support of the Review Application, together with this Order, the Application dated 28 July 2026, the Fourth Witness Statement of Elwira Kelly dated 28 July 2026, and all other documents previously filed by the Claimants in these proceedings on the Named Defendants, by:

   (i) 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 this Order; and

   (ii) Uploading a copy of those documents (omitting Schedule 1 of this Order) to the following website: www.moog.co.uk/injunction; and

   (iii) Upon making the Review Application, by placing signs at prominent locations on the perimeter of the Sites shown edged red on Plans 1, 4, and 5, and edged yellow on Plans 2 and 3 at Schedule 2 of the Injunction Order which advises that the Proposed Application and the Review Application have been made and provides a weblink and QR code by which the website or webpage mentioned in paragraph 1(ii) above can be accessed (the **"Signs"**).

   (iv) Alternatively, 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.

(v) Alternatively, by serving any solicitor acting for a Named Defendant who has filed a notice of acting in these proceedings.

2. Effective service of the Proposed Application, this Order, the Application dated 28 July 2026, the Fourth Witness Statement of Elwira Kelly dated 28 July 2026, and all documents previously filed in this Claim will be deemed to have taken place on the date for each of the Defendants on which all the relevant steps in Paragraphs 1(i) and (ii) (alternatively Paragraphs 1(iv) or (v)) have been carried out. Effective service of the Review Application and evidence in support of the Review Application will be deemed to have taken place on the date for each of the Defendants on which all the relevant steps in Paragraph 1 have been carried out.

3. For the avoidance of doubt, in respect of the steps referred to at Paragraph 1(iii), effective service will be deemed to have taken place when the Signs have all been first affixed regardless of whether they are subsequently removed.

4. For the purposes of Paragraph 1(iii), "prominent location" in relation to each Site has the same meaning as in Paragraph 14 of the Injunction Order.

5. The Claimants shall serve this Order, the Application dated 28 July 2026 and the Fourth Witness Statement of Elwira Kelly on the Named Defendants on the terms set out in this Order.

6. The Named Defendants may apply to have this Order set aside or varied, pursuant to CPR r.23.10.

COSTS

7. Costs reserved.

SERVICE

8. The court has provided a sealed copy of this Order to the serving party at mooglegal@moog.com.

COMMUNICATIONS WITH THE CLAIMANTS

9. The Claimants' contact details are:

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

(2) mooglegal@moog.com.

SCHEDULE 1 – NAMED DEFENDANTS' ADDRESSES



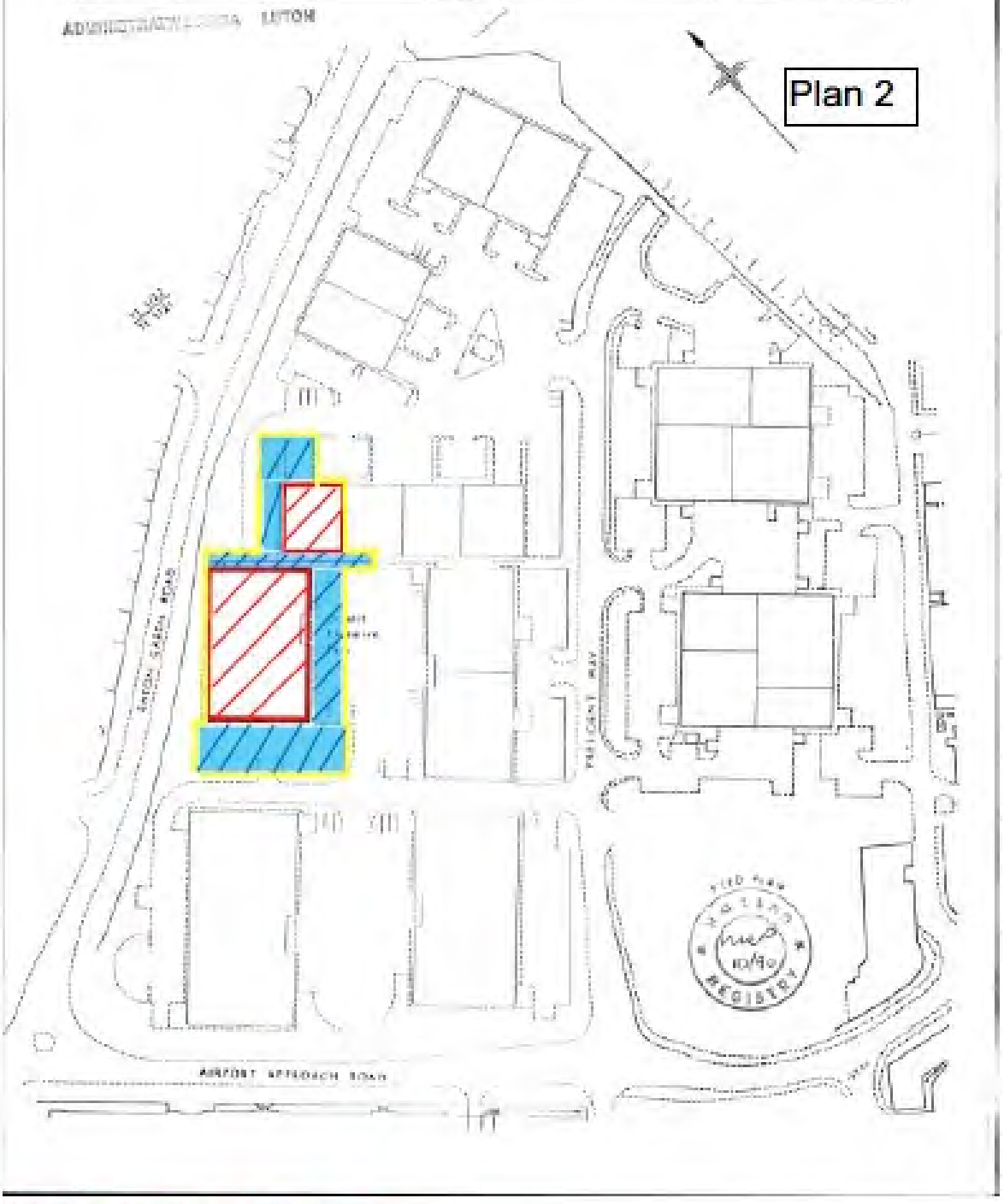
SCHEDULE 2 – PLANS

Plan 1



H.M. LAND REGISTRY		TITLE NUMBER BD154447	
ORDNANCE SURVEY PLAN REFERENCE	TL 1121	SECTION C	Scale 1/1250
[illegible]	[illegible]		© Crown copyright

Plan 2



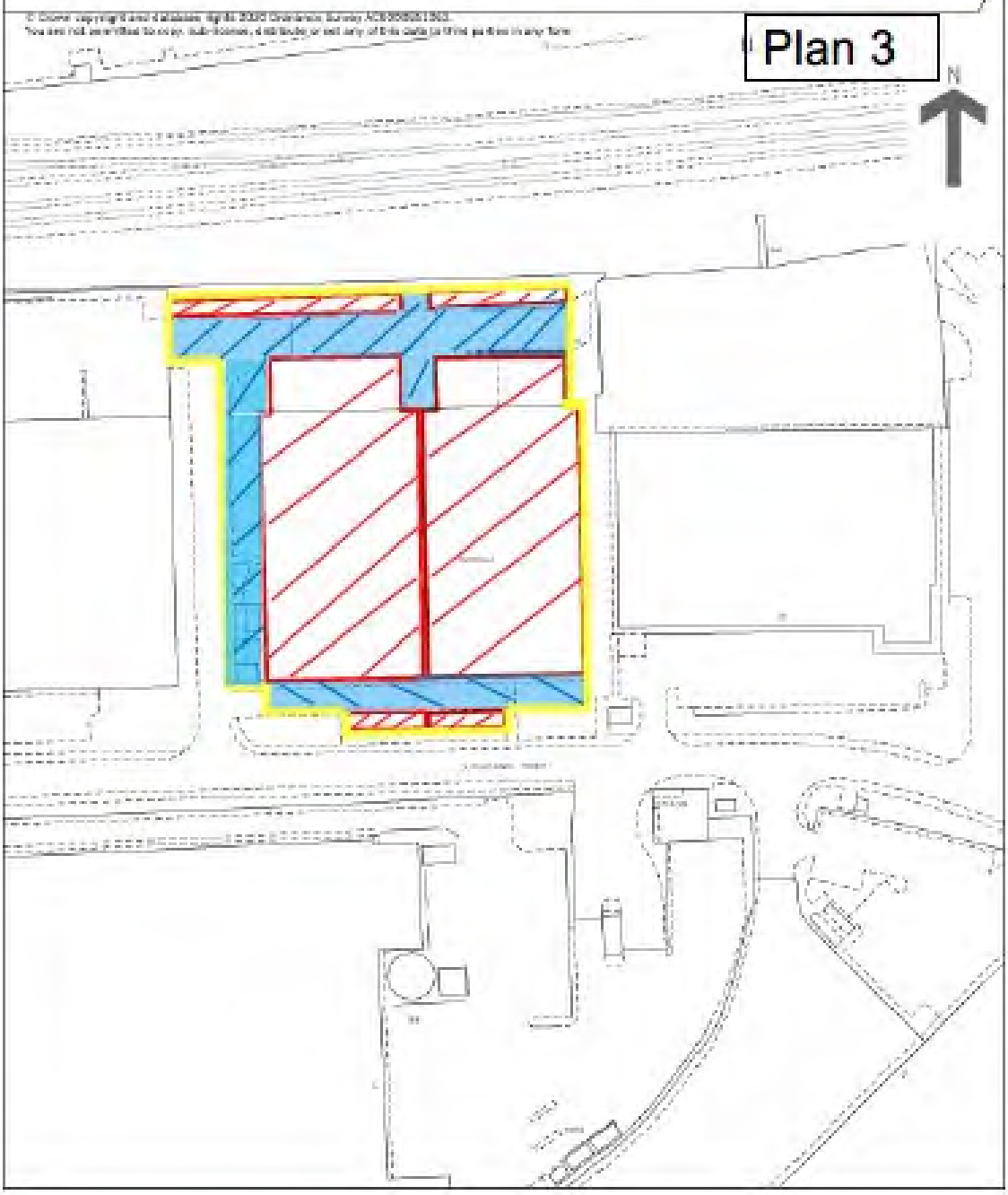
This official copy is incomplete without the preceding notes page.

HM Land Registry
Official copy of
title plan

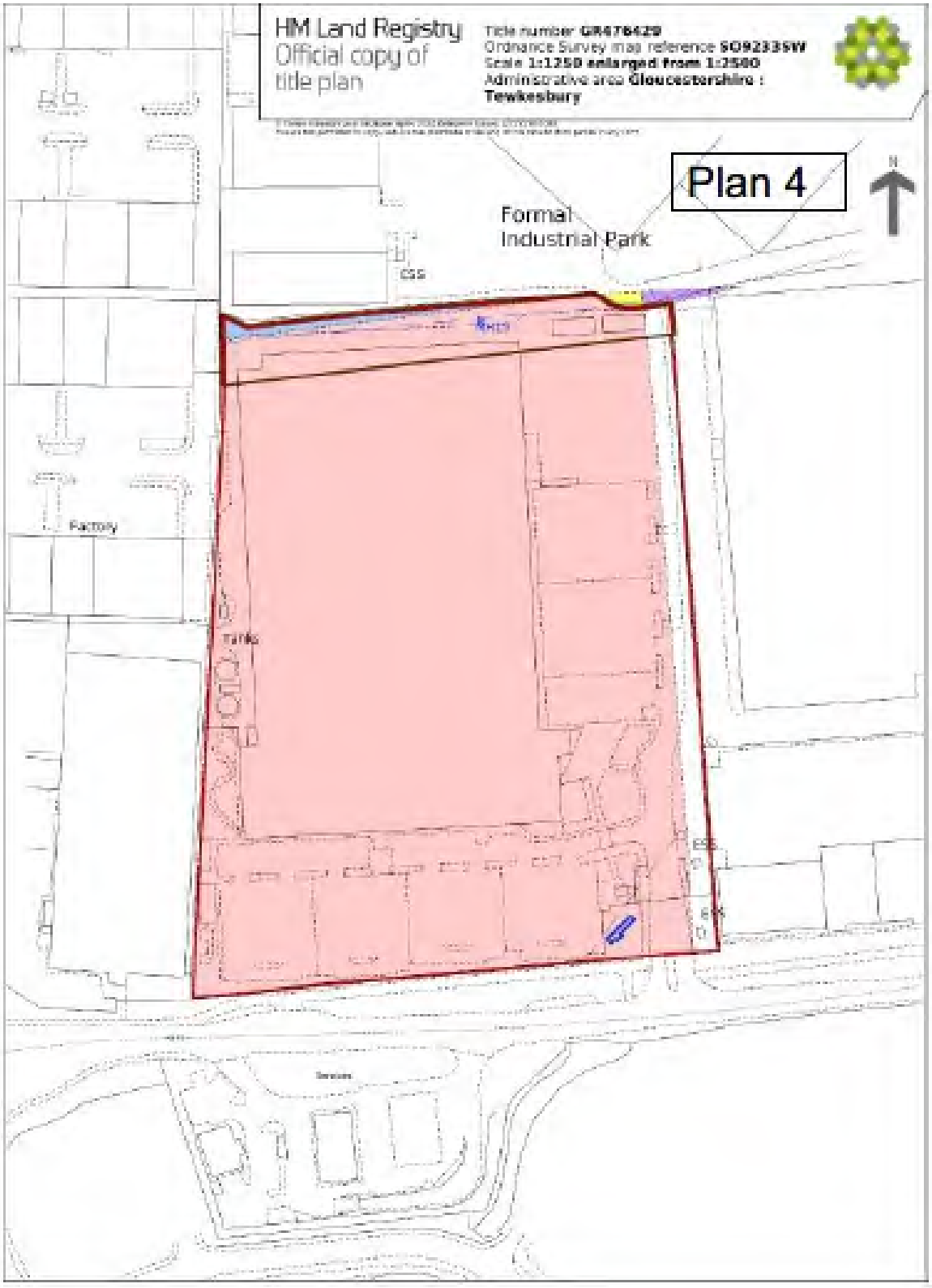
Title number **BK501808**
Ordnance Survey map reference **SU7473NW**
Scale **1:1250**
Administrative area **Wokingham**

© Crown copyright and database rights 2020 Ordnance Survey 100026316.
You are not permitted to copy, sub-license, distribute or sell any of this data to third parties in any form.

Plan 3



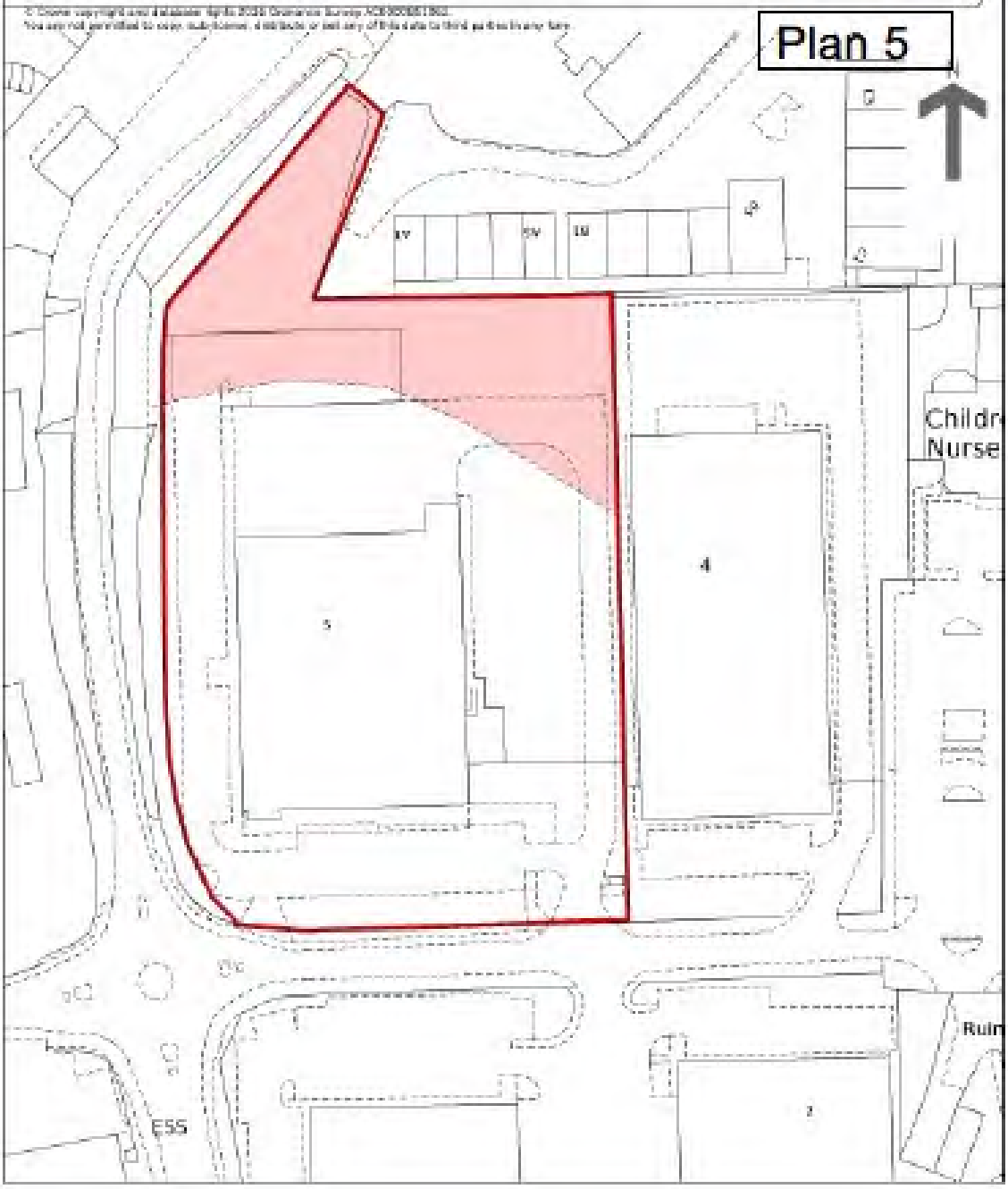
This official copy is incomplete without the preceding notes page.


HM Land Registry
Official copy of
title plan
Title number GR478429
Ordnance Survey map reference SO9233SW
Scale 1:1250 enlarged from 1:2500
Administrative area Gloucestershire :
Tewkesbury
Plan 4
Formal
Industrial Park
Factory
Tanks

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

© Crown copyright and database rights 2020 Ordnance Survey AC0000851362.
You are not permitted to copy, sub-license, distribute or sell any of this data to third parties in any form.



This official copy is incomplete without the preceding notes page.

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

N244

Application notice

Notice of hearing Application will be heard at 7 Rolls Building, London, EC4A 1NL at the discretion of the Judge
Date: TBH at existing hearing listed in a 3 day window from 18th November 2026
Time: TBC
Court: TBC
Please note this has been listed as requested on the basis that it is agreed by both parties and does not increase the time estimate of the existing hearing.

Name of court High Court of Justice Business and Property Division	**Claim no.** PT-2025-000910
Fee account no. (if applicable)	**Help with Fees Ref. no.** (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	02 October 2026

HIGH COURT OF JUSTICE BUSINESS & PROPERTY COURTS OF ENGLAND & WALES
05 Oct 2026

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 an order from the Court for the following defendants (the "Named Defendants") to be added as new parties (respectively the Sixth, Seventh, Eighth and Ninth Defendants) to the Claim, pursuant to CPR 19.2(2) and CPR 19.4:
(i) Hanah Yun Stevens
(ii) Bea Sherman (also known as Frank Sherman)
(iii) Iain Evans
(iv) Hisham Alkhamesi

Further and pursuant to CPR 17.1(2)(b), the Claimants seek permission from the Court to amend its statements of case to include the addition of the Named Defendants and any other consequential amendments thereof.

If (and to the extent) required by the Court beyond the application made by the Claimants dated 28 July 2026 (sealed by the Court on 30 July 2026), the Claimants apply to review the injunction granted by the Honourable Mr Justice Thompsell in his order of 6 October 2025, pursuant to paragraph 7 of that order. A draft order is attached to this application reflecting this and the orders sought by the Claimants above.

☒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? 2 Hours 30 Minutes

☐Yes ☒No

7. Give details of any fixed trial date or period

~~Injunction review hearing is listed for a 3 day window from 18 No~~vember 2026, we would ask this application to be heard at that h earing. The 2 1/2 hour time estimate reflects that provided for in paragraph 7 of the Injunction Order dated 6 October 2025.

8. What level of Judge does your hearing need?

High Court Judge

9. Who should be served with this application?

Please see below

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

The Claimants have been granted permission to serve the Named Defendants by alternative means, pursuant to the order of Master McQuail dated 3 September 2026. The Claimants will serve the Named Defendants pursuant to the terms of that order.
The Claimants will notify the First to Fifth Defendants ("Persons Unknown") in accordance with paragraph 10 of the order of the Honourable Mr Justice Thompsell dated 6 October 2025 (sealed 8 October 2025).

Click here to enter text. Click here to enter text.

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

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.

Please see attached the fifth witness statement of Elwira Kelly in support of this application.

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

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

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

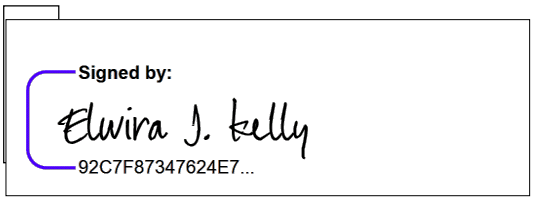
Statement of Truth

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



☒ 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
02	10	2026

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

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

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

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

SCHEDULE 1 - LIST OF DEFENDANTS

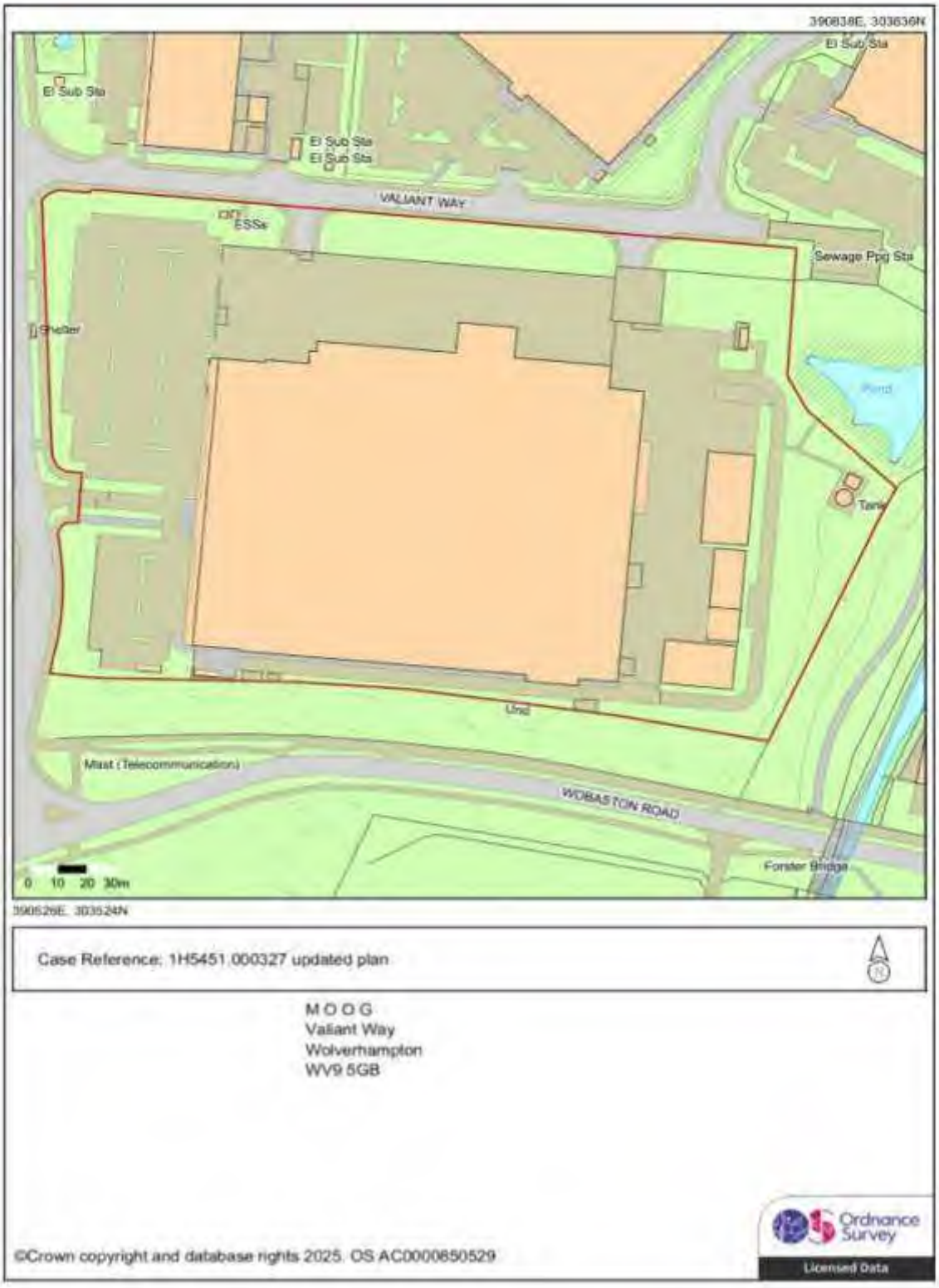
(1) PERSONS UNKNOWN WHO FOR THE PURPOSE OF PROTEST OR SABOTAGE ENTER OCCUPY OR REMAIN ON, OR DAMAGE,THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 1 BEING MOOG AIRCRAFT GROUP WOLVERHAMPTON, VALIANT WAY, PENDEFORD, WOLVERHAMPTON WV9 5GB, OR WHO OBSTRUCT AND/OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT AND/OR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



Case Reference: 1H5451.000327 updated plan

M O O G
Valiant Way
Wolverhampton
WV9 5GB

©Crown copyright and database rights 2025. OS AC0000850529
Ordnance Survey
Licensed Data

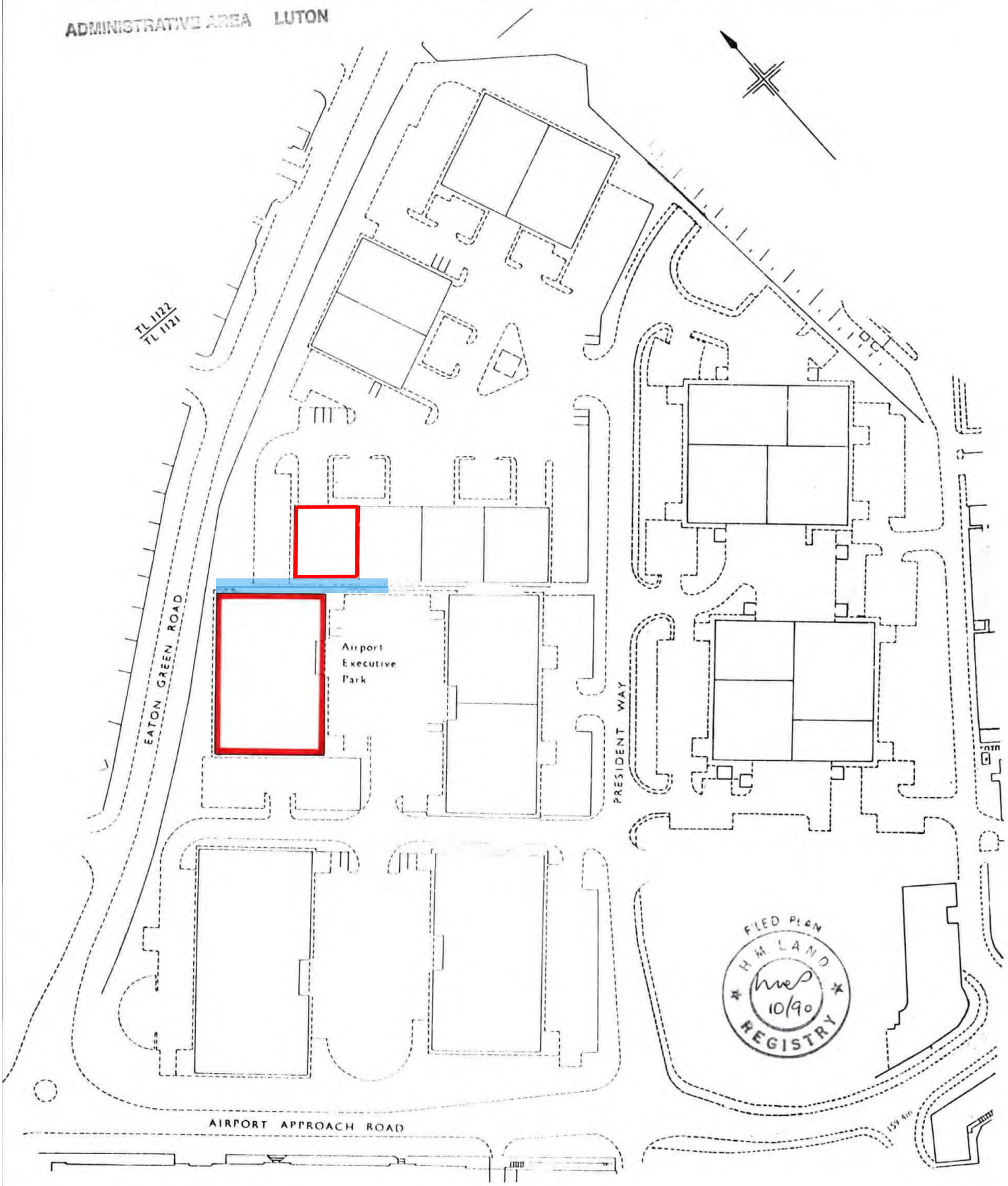
Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

H.M. LAND REGISTRY

TITLE NUMBER	
BD 154447	

ORDNANCE SURVEY PLAN REFERENCE	TL 1121	SECTION C	Scale 1/1250
~~COUNTY BEDFORDSHIRE~~	~~DISTRICT LUTON~~		© Crown copyright

ADMINISTRATIVE AREA LUTON



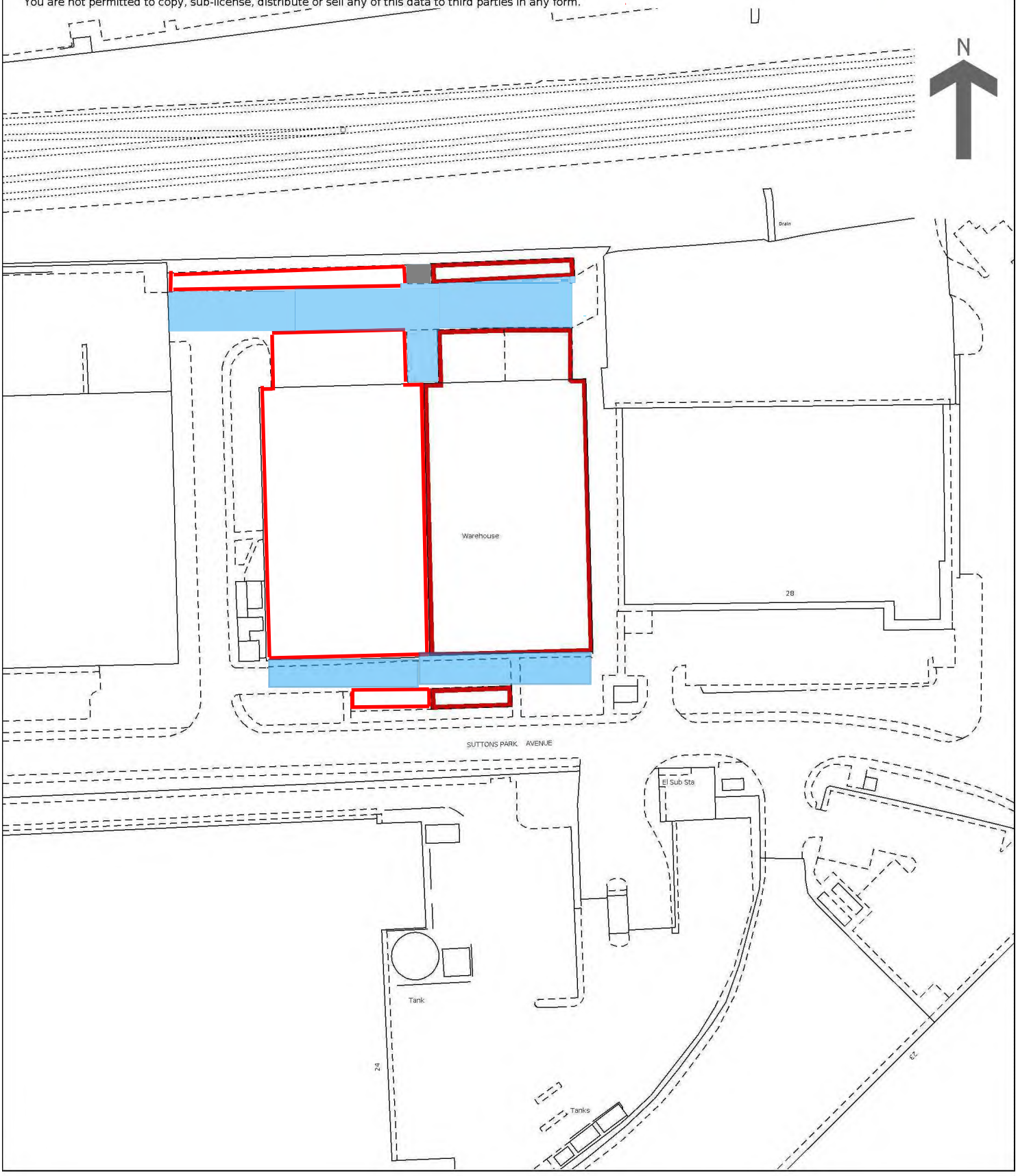
This official copy is incomplete without the preceding notes page.

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

HM Land Registry
Official copy of title plan

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

© Crown copyright and database rights 2020 Ordnance Survey AC0000851063.
You are not permitted to copy, sub-license, distribute or sell any of this data to third parties in any form.



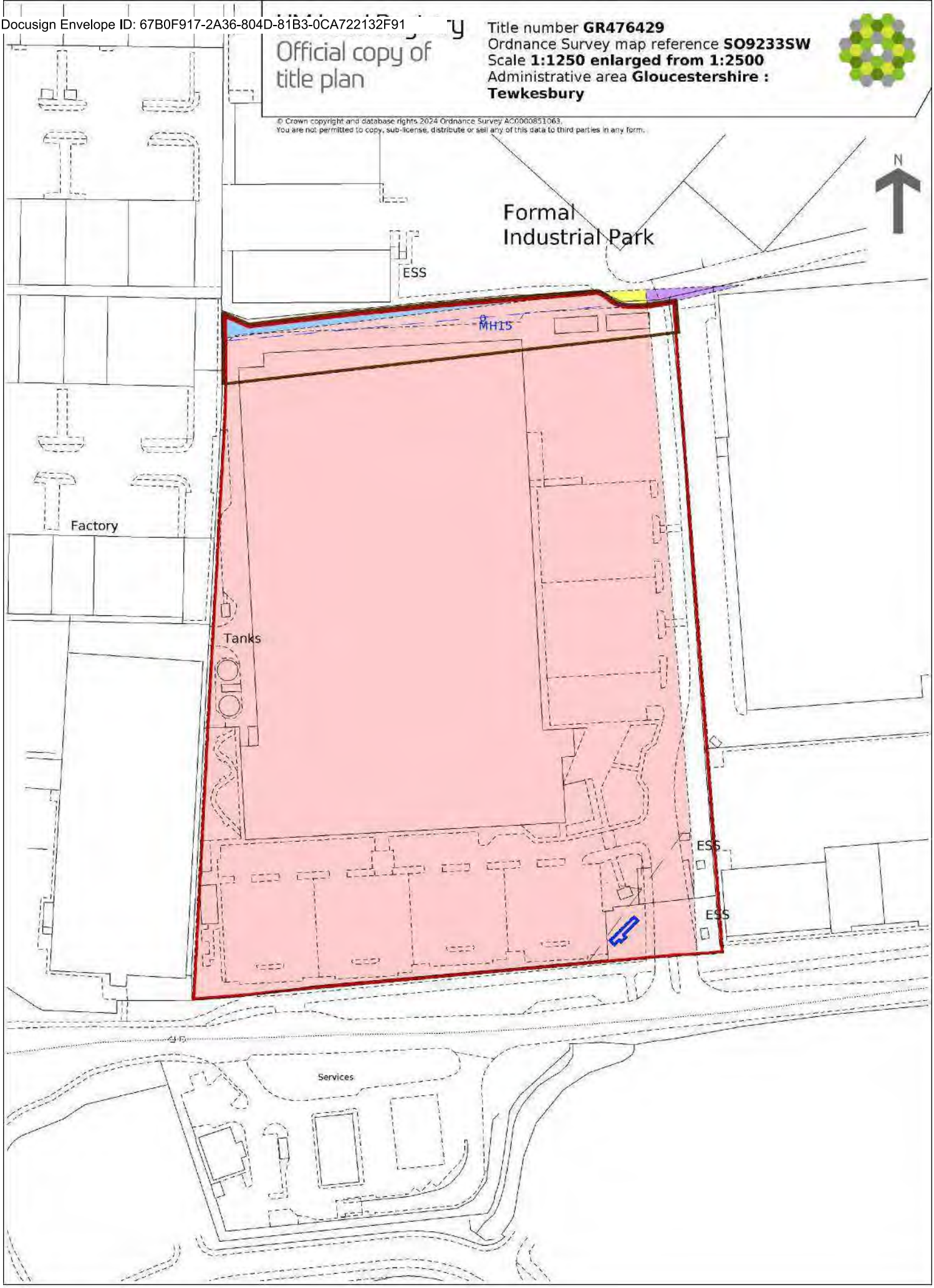
This official copy is incomplete without the preceding notes page.

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

Official copy of title plan

Title number **GR476429**
Ordnance Survey map reference **SO9233SW**
Scale **1:1250 enlarged from 1:2500**
Administrative area **Gloucestershire : Tewkesbury**

© Crown copyright and database rights 2024 Ordnance Survey AC0000851063.
You are not permitted to copy, sub-license, distribute or sell any of this data to third parties in any form.



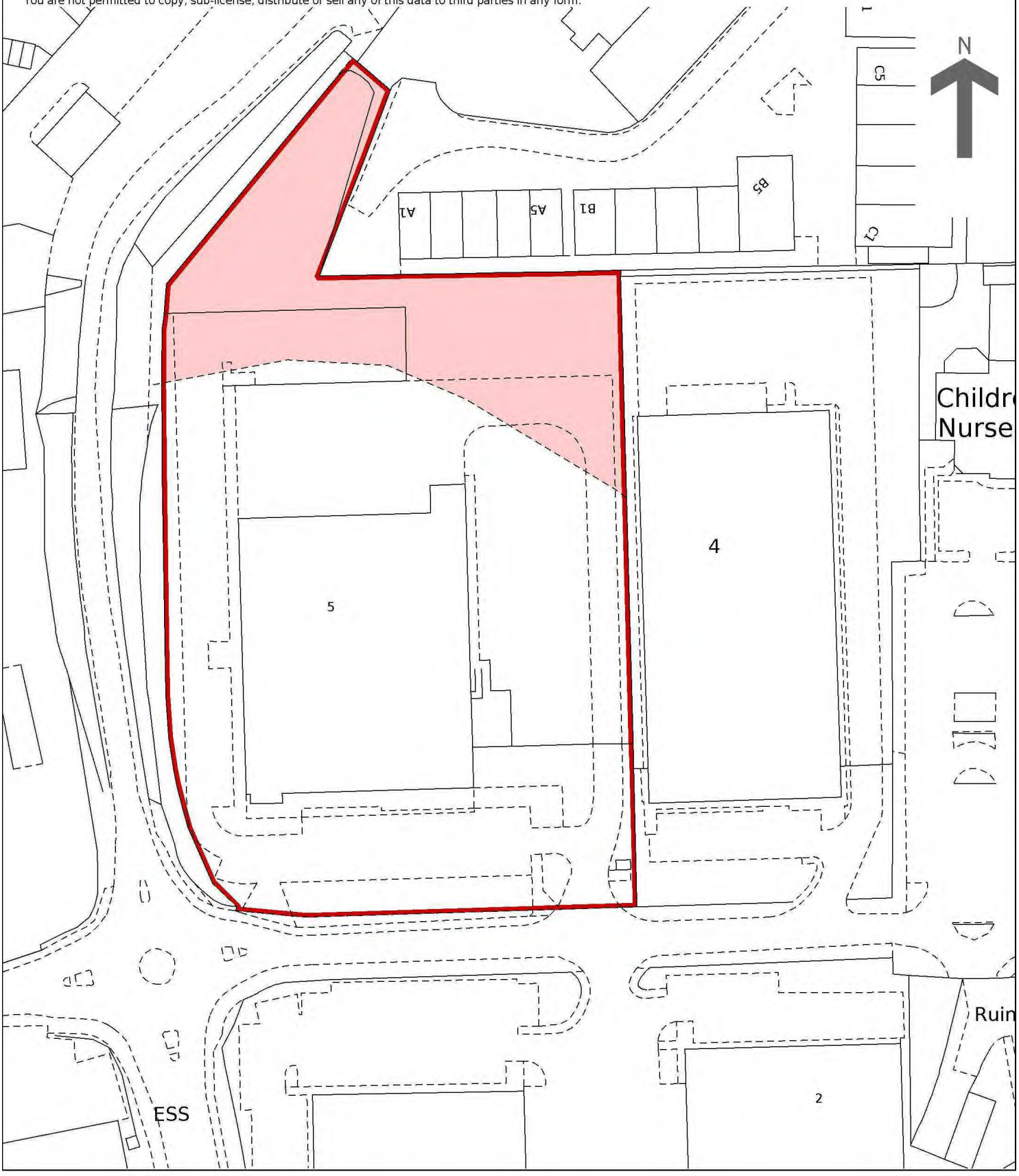
This official copy is incomplete without the preceding notes page.

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

HM Land Registry
Official copy of title plan

Title number **GR395822**
Ordnance Survey map reference **SO9233SW**
Scale **1:1250 enlarged from 1:2500**
Administrative area **Gloucestershire : Tewkesbury**

© Crown copyright and database rights 2016 Ordnance Survey AC0000851063.
You are not permitted to copy, sub-license, distribute or sell any of this data to third parties in any form.



This official copy is incomplete without the preceding notes page.

IN THE HIGH COURT OF JUSTICE **Claim No: PT-2025-000910**

BUSINESS AND PROPERTY DIVISION

PROPERTY TRUSTS AND PROBATE LIST

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 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 (FIRST DEFENDANT)

(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 (SECOND DEFENDANT)

(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 (THIRD DEFENDANT)

(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 (FOURTH DEFENDANT)

(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 (FIFTH DEFENDANT)

(6) HANAH YUN STEVENS (SIXTH DEFENDANT)

(7) BEA SHERMAN (ALSO KNOWN AS FRANK SHERMAN) (SEVENTH DEFENDANT)

(8) IAIN EVANS (EIGHTH DEFENDANT)

(9) HISHAM ALKHAMESI (NINTH DEFENDANT)

Defendants

[DRAFT] ORDER

PENAL NOTICE

IF YOU ARE A PERSON WITHIN THE CATEGORIES OF DEFENDANTS MENTIONED ABOVE, OR ANY ONE OF THE NAMED DEFENDANTS

(TOGETHER THE "DEFENDANTS") DISOBEY THIS ORDER OR INSTRUCT 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 on 2026

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

AND UPON the Claimants having applied for an ex parte interim injunction by Application Notice dated 4 September 2025

AND UPON interim injunctive relief having been granted in part by the Honourable Mr Justice Meade on 5 September 2025

AND UPON continuation of the interim injunctive relief granted on 5 September 2025 and further injunctive relief preventing the obstruction of or interference with access, as detailed in the Claimants' application for injunctive relief of 4 September 2025 and draft Order provided therewith, being granted by the Honourable Mr Justice Thompsell on 6 October 2025 (the "Injunction Order")

AND UPON the Claimant making an application by way of an Application Notice dated 2 October 2026 to add Hanah Yun Stevens, Bea Sherman (also known as Frank Sherman), Iain Evans, and Hisham Alkhamesi as sixth, seventh, eighth and ninth Defendants (respectively) to the Claim and to further amend the ~~Re-~~Amended Claim Form and Re-Amended Particulars of Claim accordingly ("the Application")

AND UPON the Claimants having applied for permission to serve the Application and other documents in this claim on the Sixth, Seventh, Eighth and Ninth Defendants by an Application

Notice dated 28 July 2026 and such permission having been granted by Master McQuail by order dated 3 September 2026

AND UPON the Claimant having applied for a review of the Injunction Order by application notice dated 28 July 2026 and, if required by the court, the Application (together "the Review Application")

AND UPON the Court being satisfied that the Review Application and other documents have been notified to the First to Fifth Defendants in accordance with paragraphs 10 and 11 of the Injunction Order and the Application, Review Application and other documents having been served on the Sixth to Ninth Defendants in accordance with the Order of Master McQuail dated 3 September 2026

AND UPON the first annual review of the injunctive relief having taken place on [DATE]

AND UPON the Court reading the fifth witness statement of Elwira Kelly dated 2 October 2026

AND UPON the Court reading the sixth witness statement of Elwira Kelly dated 3 November 2026

AND UPON HEARING Timothy Morshead KC for the Claimants

AND UPON the Court being satisfied that there has been no material change in circumstances warranting amendments to or the setting aside of the injunctive relief granted by the Injunction Order and that it is appropriate to continue the injunctive relief against the First to Fifth Defendants and for the same injunctive relief to be ordered in respect of the Sixth to Ninth Defendants

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

IT IS ORDERED THAT:

INJUNCTION

1. The First, Sixth, Seventh, Eighth and Ninth 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) deliberately and with knowledge of this Order obstruct or interfere with or attempt to obstruct or interfere with access to or egress from the land and premises shown edged red on Plan 1 with or without vehicles by the First Claimant, its agents, employees, contractors, customers, suppliers or other licencees;

(iii) 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, Sixth, Seventh, Eighth and Ninth 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) deliberately and with knowledge of this Order obstruct or interfere with or attempt to obstruct or interfere with access to or egress from the land and premises shown edged yellow on Plan 2 with or without vehicles by the Second Claimant, its agents, employees, contractors, customers, suppliers, or other licencees;

(iii) 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, Sixth, Seventh, Eighth and Ninth 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) deliberately and with knowledge of this Order obstruct or interfere with or attempt to obstruct or interfere with access to or egress from the land and premises shown edged yellow on Plan 3 with or without vehicles by the Third Claimant, its agents, employees, contractors, customers, suppliers, or other licencees;

(iii) 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, Sixth, Seventh, Eighth and Ninth 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) deliberately and with knowledge of this Order obstruct or interfere with or attempt to obstruct or interfere with access to or egress from the land and premises shown edged red on Plan 4 with or without vehicles by the Fourth Claimant, its agents, employees, contractors, customers, suppliers, or other licencees;

(iii) 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, Sixth, Seventh, Eighth and Ninth 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) deliberately and with knowledge of this Order obstruct or interfere with or attempt to obstruct or interfere with access to or egress from the land and premises shown edged red on Plan 5 with or without vehicles by the Fourth Claimant, its agents, employees, contractors, customers, suppliers, or other licencees;

(iii) 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.

REVIEW

7. The injunction set out at paragraphs 1 to 5 of this Order shall be reviewed annually on each anniversary of this Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 2 ½ hours. The Claimants are permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton Arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the hearing. The injunction set out at paragraphs 1 to 6 of this Order shall lapse at 4pm on the anniversary of this Order (or as the case may be the latest annual review) unless, before then, the Claimants have applied for the review to take place.

PERMISSION TO AMEND

8. Pursuant to CPR r.17.1(2)(b), the Claimants are permitted to re-amend the Re-Amended Claim Form and Re-Amended Particulars of Claim in the forms provided with the Application.

SERVICE AND NOTIFICATION

9. Service of the ~~Re-~~Re-Amended Claim Form, the Re-Re-Amended Particulars of Claim and this Order on the First to Fifth Defendants is dispensed with, pursuant to CPR 6.28 and 81.4(2)(c).

10. This Order shall be notified to the First to Fifth 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 including a QR code linking to the website in paragraph 10(i) above. 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 12 below) shall be replaced with notices in A2 size as soon as reasonably practicable.

11. The ~~Re-~~Re-Amended Claim Form and Re-Re-Amended Particulars of Claim shall be notified to the First to Fifth Defendants by the Claimants:

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

(ii) Including reference to those documents within the warning notices to be affixed to the Sites as required by paragraph 10(iii) of this Order.

12. Notification to the First to Fifth 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; and

(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 First to Fifth Defendants may be effected by carrying out the steps set out in paragraphs 12(i) and 12(ii).

14. Pursuant to CPR 6.15 and 6.27, the Claimants have permission to serve the Sixth, Seventh, Eighth, and Ninth Defendants ("the Named Defendants") with the ~~Re-~~Re-Amended Claim Form, the Re-Re-Amended Particulars of Claim, this Order and any further applications and documents in the Claim by:

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

(ii) Where an address of a Named Defendant is known to the Claimants, posting a copy of those documents together with a covering letter by way of first-class post; and

(iii) Placing signs at prominent locations on the perimeter of the Sites shown edged red on Plans 1, 4, and 5, and edged yellow on Plans 2 and 3, which advise that a High Court injunction is in force that restricts some protest activities, and which provide a weblink and QR code by which the website or webpage mentioned in paragraphs 10(i), 11(i), 12(i) and 14(i) above can be accessed;

(iv) Alternatively, 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; or

(v) Alternatively, by serving any solicitor acting for a Named Defendant who has filed a notice of acting in these proceedings.

15. In respect of paragraphs 10, 11, 12, 13 and 14 of this Order, effective service or notification (as applicable) 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.

16. For the avoidance of doubt, in respect of the steps referred to at paragraphs 10(ii), 10(iii), 11(ii), 12(ii), 13 and 14(iii), effective service or notification (as applicable) will be deemed to have taken place when the documents have all been first affixed regardless of whether they are subsequently removed.

17. For the purposes of paragraphs 10(ii), 12(ii) and 14(iii), "prominent location" in relation to each Site means:

(i) All of the locations shown marked on the Plans exhibited to the Third Witness Statement of Elwira Kelly including, for the avoidance of doubt, those locations at the sites shown edged yellow on Plan 2 ("the Luton Site") and edged yellow on Plan 3 ("the Reading Site") where additional notices were proposed to be erected as detailed at paragraph 4(e) of the Third Witness Statement of Elwira Kelly;

(ii) At either side of all entrances to the perimeter of each of the Sites;

(iii) On the perimeter fencing for those Sites which are in whole or in part enclosed by a perimeter fence;

(iv) At the Reading Site, to the extent not already so provided pursuant to paragraph 17(i) to (iii), at the entrance points at the south-east, south-west, north-east and north-west of the boundary of the Site shown edged yellow on Plan 3;

(v) At the Luton Site, to the extent not already provided pursuant to paragraph 17(i) to (iii) above, the entrance to the parking area and loading bay to Unit J at the north-west of the Site, the western end of the walkway between Units C and J and at the entrance to the car parking area to the south of Unit C, each of which are shown hatched blue on Plan 2.

VARIATION

18. 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.

19. Any person applying to vary or discharge this Order must provide their full name, address and address for service.

20. The Claimants have liberty to apply to vary this Order.

COSTS

21. Costs reserved.

COMMUNICATIONS WITH THE CLAIMANTS

22. The Claimants' contact details are:

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

(2) mooglegal@moog.com.

Dated:

SCHEDULE 1 – UNDERTAKINGS

1. 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

Plan 1



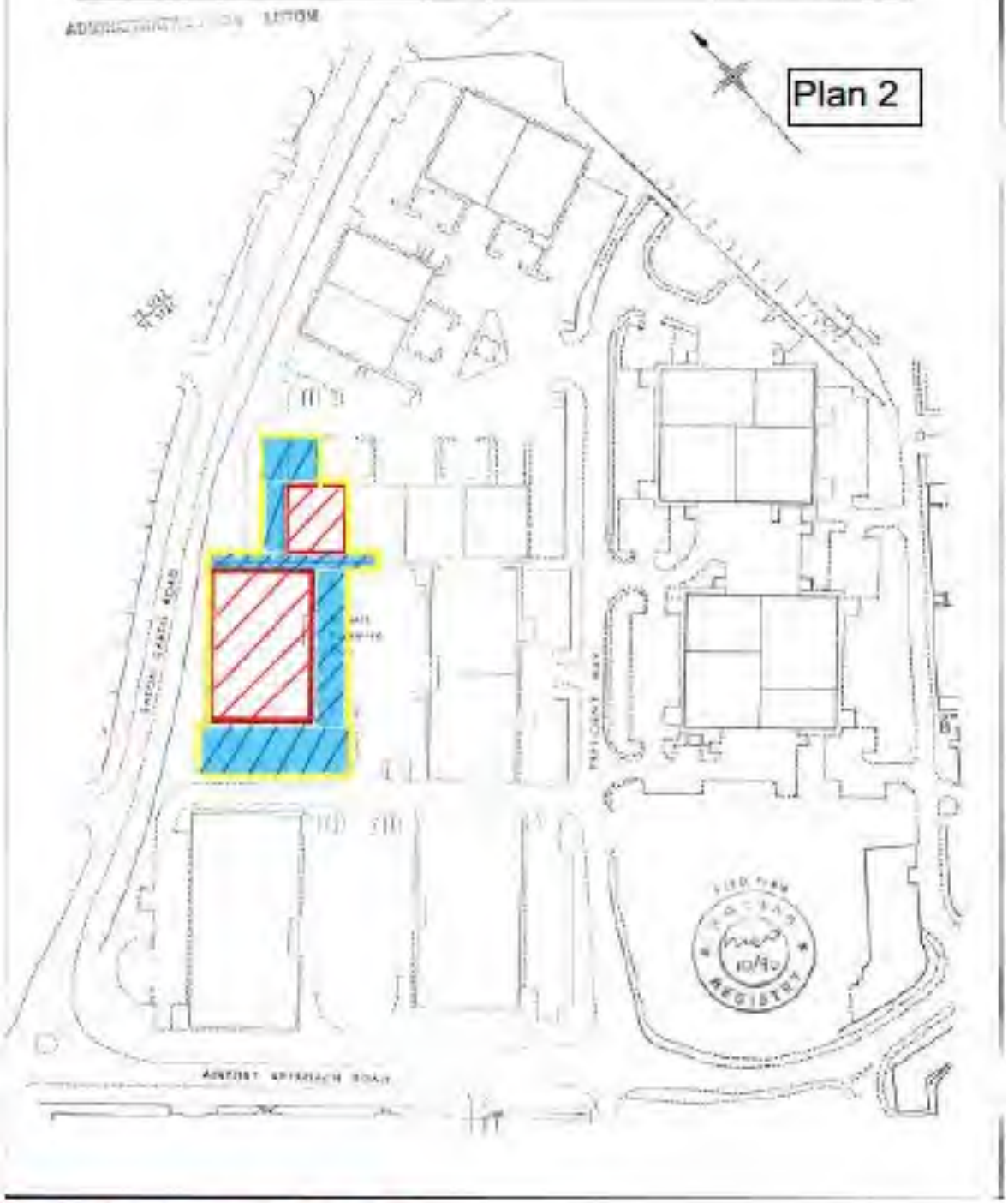
Case Reference: 1H5451.000327 updated plan

M O O G
Valiant Way
Wolverhampton
WV9 5GB

©Crown copyright and database rights 2025 OS AC0000850529

H.M. LAND REGISTRY		TITLE NUMBER BD154447	
ORDNANCE SURVEY PLAN REFERENCE	TL 1121	SECTION C	SCALE 1/1250
COUNTY—BEDFORDSHIRE	DISTRICT—LUTON		© Crown copyright

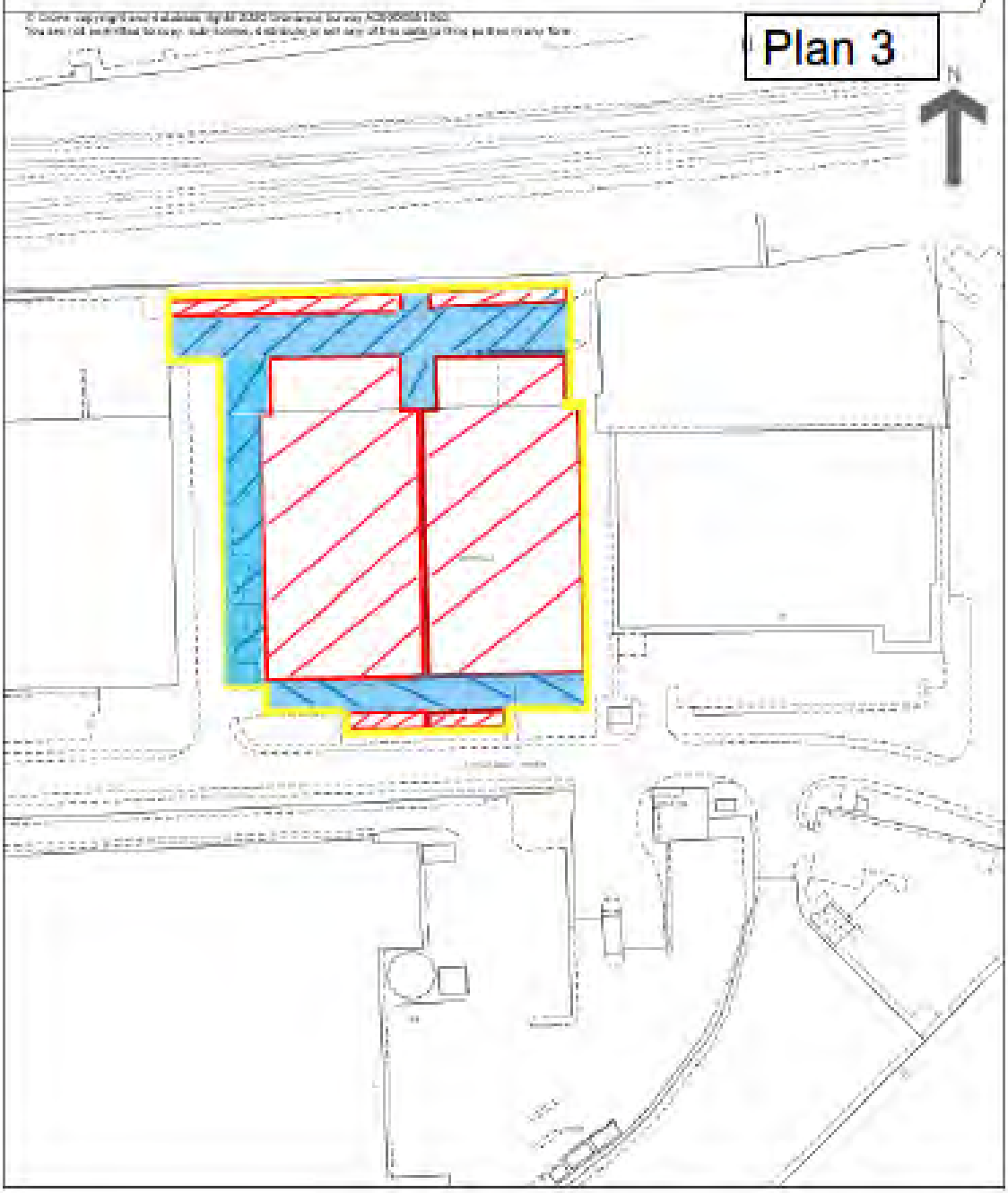
Plan 2



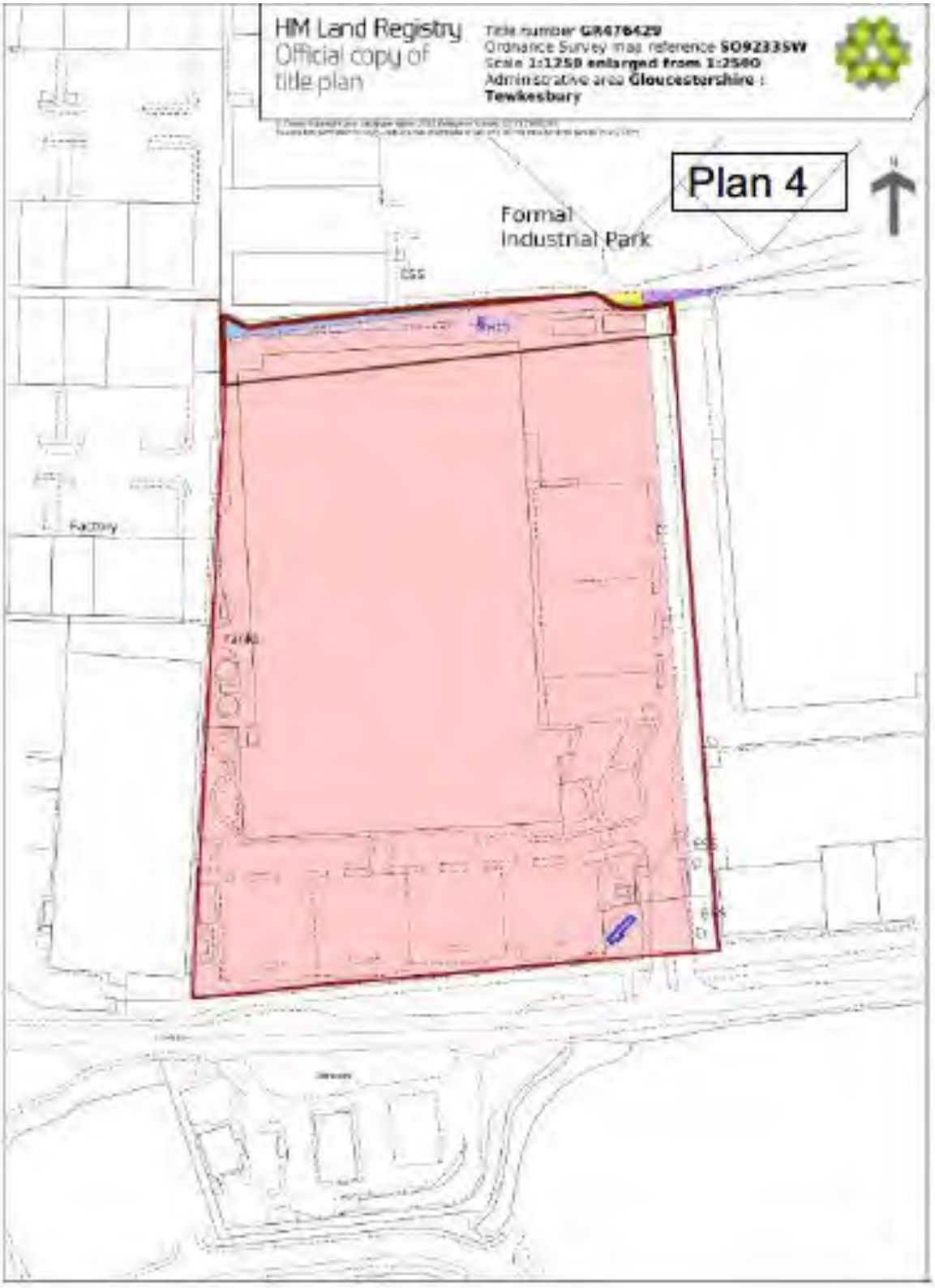
This official copy is incomplete without the preceding notes page.

HM Land Registry
Official copy of title plan

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

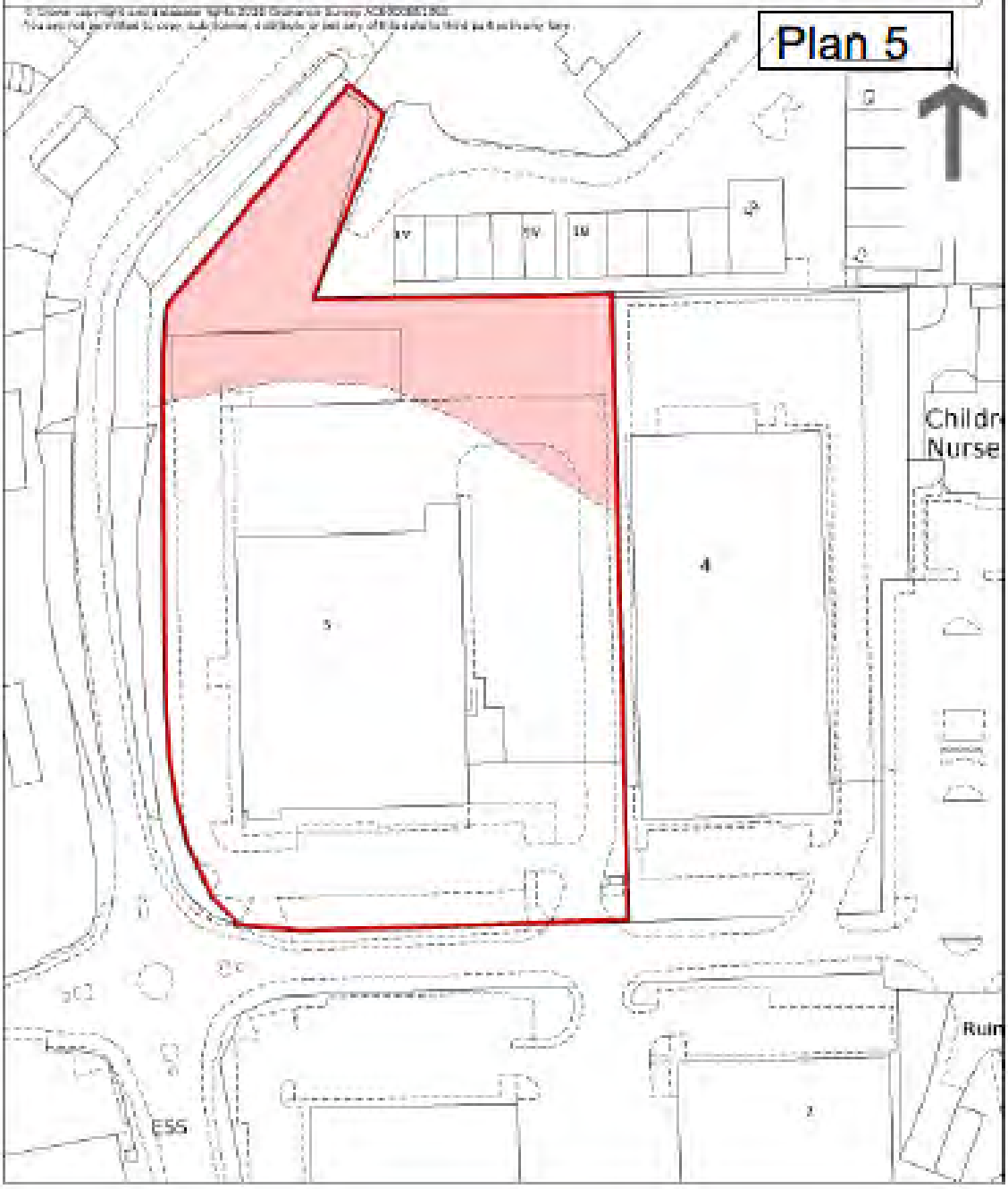


This official copy is incomplete without the preceding notes page.


HM Land Registry
Official copy of
title plan
Title number GR478429
Ordnance Survey map reference SO9233SW
Scale 1:1250 enlarged from 1:2500
Administrative area Gloucestershire :
Tewkesbury
Plan 4
Formal
Industrial Park
Factory

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**



This official copy is incomplete without the preceding notes page.

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 6 October 2025 and reviewed on [DATE] 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 OR SABOTAGE 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. **DELIBERATELY AND WITH KNOWLEGDE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 1**
3. **INTERFERE OR ATTEMPT TO INTERFERE WITH ANY OF THE SERVICES SERVING THE LAND AND PREMISES SHOWN EGDED 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 (including the amendments made to the persons subject to the Order and the ~~re-~~re-amended claim form and re-re-amended particulars of claim) can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com

Plan 1



Case Reference: 1H5451.000327 updated plan

M O O G
Valiant Way
Wolverhampton
WV9 5GB

©Crown copyright and database rights 2025. OS AC0000850529

Ordnance Survey
Licensed Data

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 and reviewed on [DATE] 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 OR SABOTAGE 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. **DELIBERATELY AND WITH KNOWLEDGE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED YELLOW ON PLAN 2**
3. **INTERFERE OR ATTEMPT TO INTERFERE WITH ANY OF THE SERVICES SERVING THE LAND AND PREMISES SHOWN EGDED 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 (including the amendments made to the persons subject to the Order and the ~~re-~~re-amended claim form and re-re-amended particulars of claim) can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com

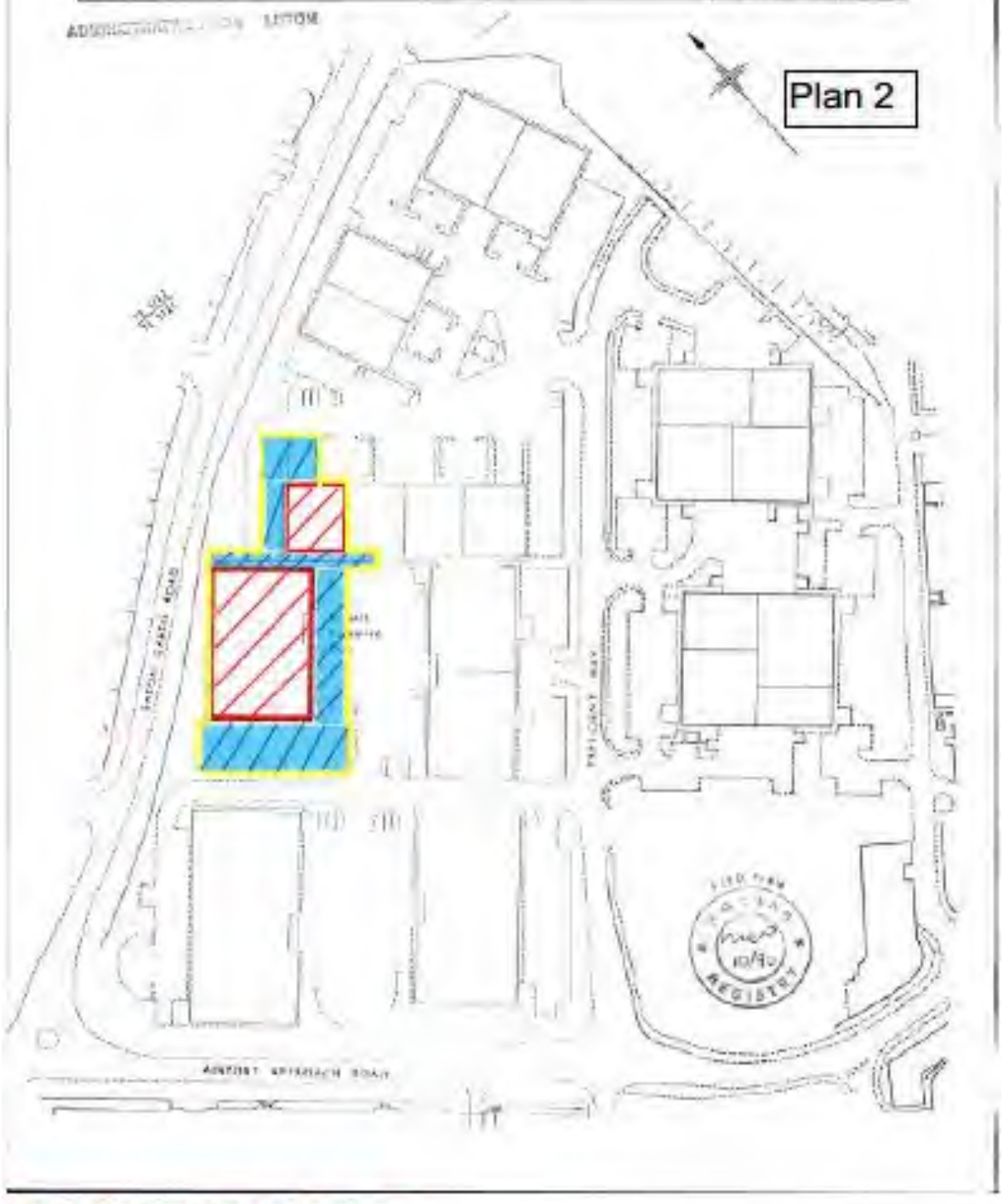
H.M. LAND REGISTRY

TITLE NUMBER

BD154447

ORDNANCE SURVEY PLAN REFERENCE	TL 1121	SECTION C	SCALE 1/1250

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 PT-2025-000910 on 6 October 2025 and reviewed on [DATE] 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:

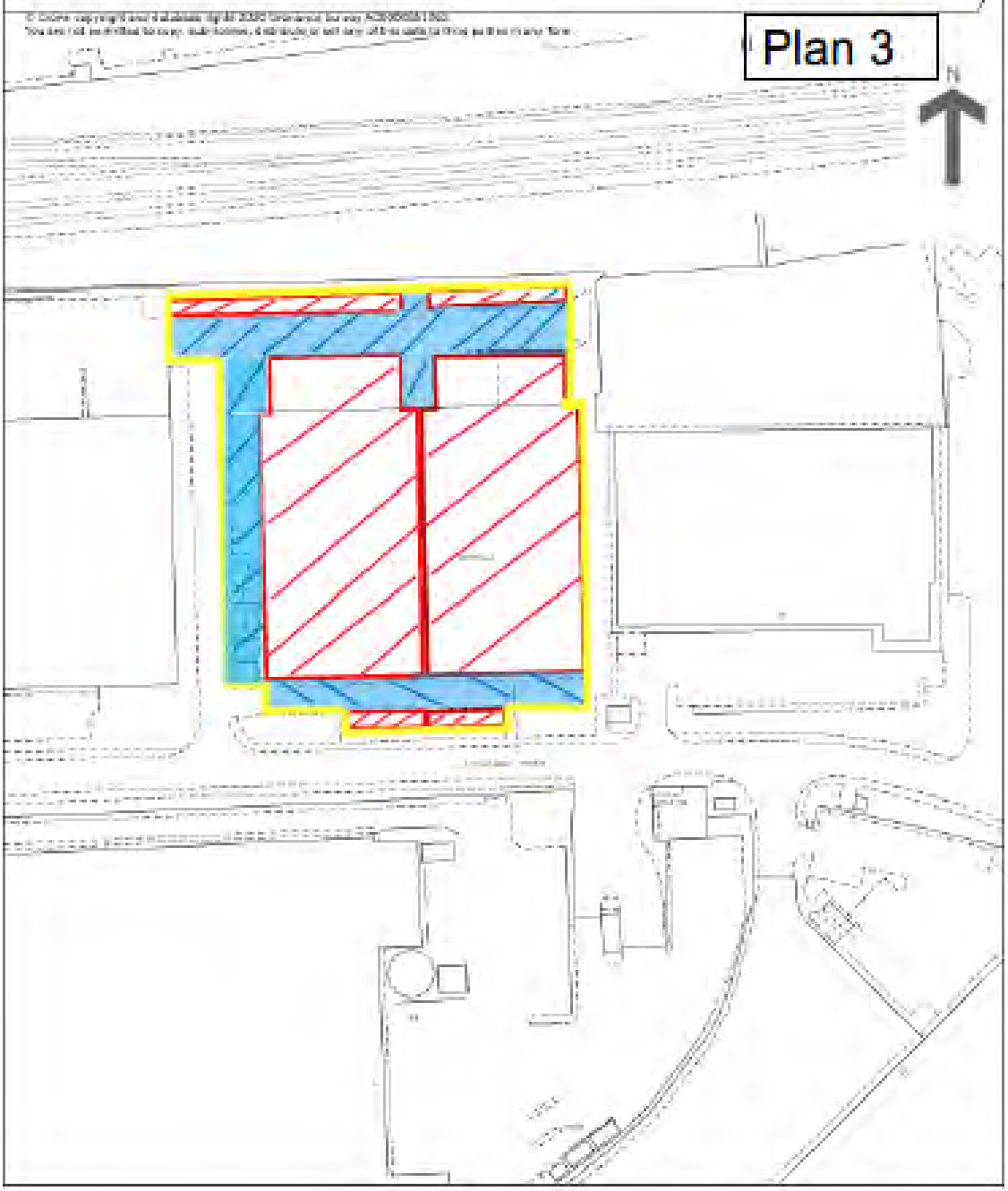
1. **FOR THE PURPOSE OF PROTEST OR SABOTAGE ENTER OCCUPY OR REMAIN ON THE LAND AND PREMISES SHOWN EDGED YELLOW ON PLAN 3 BEING MOOG READING LIMITED, 30 SUTTONS BUSINESS PARK, READING, BERKSHIRE, RG6 1AW**
2. **DELIBERATELY AND WITH KNOWLEGDE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED YELLOW ON PLAN 3**
3. **INTERFERE OR ATTEMPT TO INTERFERE WITH ANY OF THE SERVICES SERVING THE LAND AND PREMISES SHOWN EGDED 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 (including the amendments made to the persons subject to the Order and the ~~re-~~re-amended claim form and re-re-amended particulars of claim) can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com

HM Land Registry
Official copy of
title plan

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



This official copy is incomplete without the preceding notes page.

WARNING NOTICE OF COURT INJUNCTION

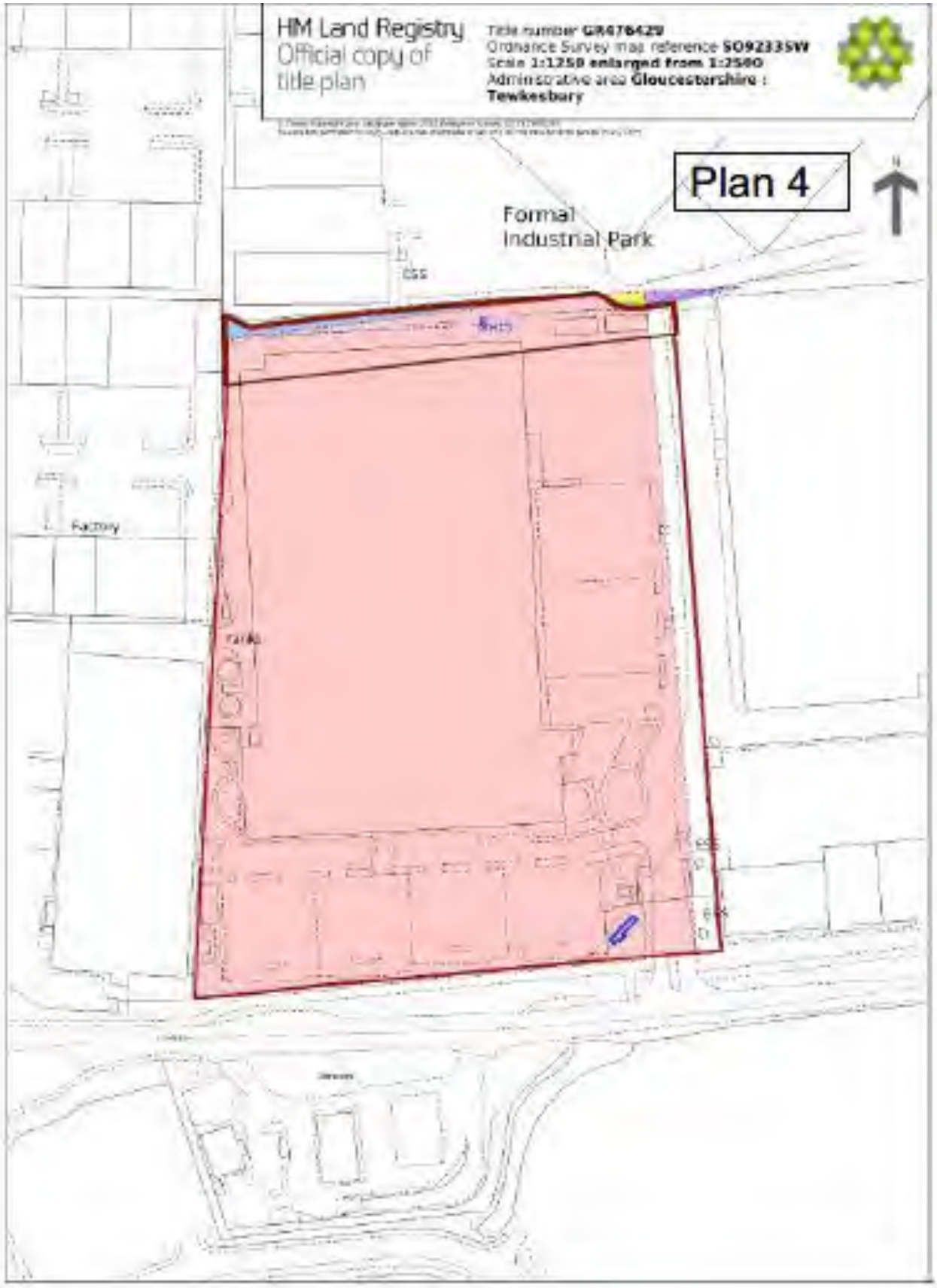
A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 and reviewed on [DATE] exists relating to the land and premises known as Moog Aircraft Group Tewkesbury, Ashchurch, Tewkesbury, Gloucestershire, GL20 8NA.

The injunction means you may not:

1. **FOR THE PURPOSE OF PROTEST OR SABOTAGE 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. **DELIBERATELY AND WITH KNOWLEGDE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 4**
3. **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 (including the amendments made to the persons subject to the Order and the ~~re-~~re-amended claim form and re-re-amended particulars of claim) can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.


HM Land Registry
Official copy of
title plan
Title number GR476429
Ordnance Survey map reference SO9233SW
Scale 1:1250 enlarged from 1:2500
Administrative area Gloucestershire :
Tewkesbury
Plan 4
Formal
Industrial Park
Factory

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 and reviewed on [DATE] exists relating to the land and premises known as Moog Industrial Group, Ashchurch Parkway, Tewkesbury, Gloucestershire, GL20 8TU

The injunction means you may not:

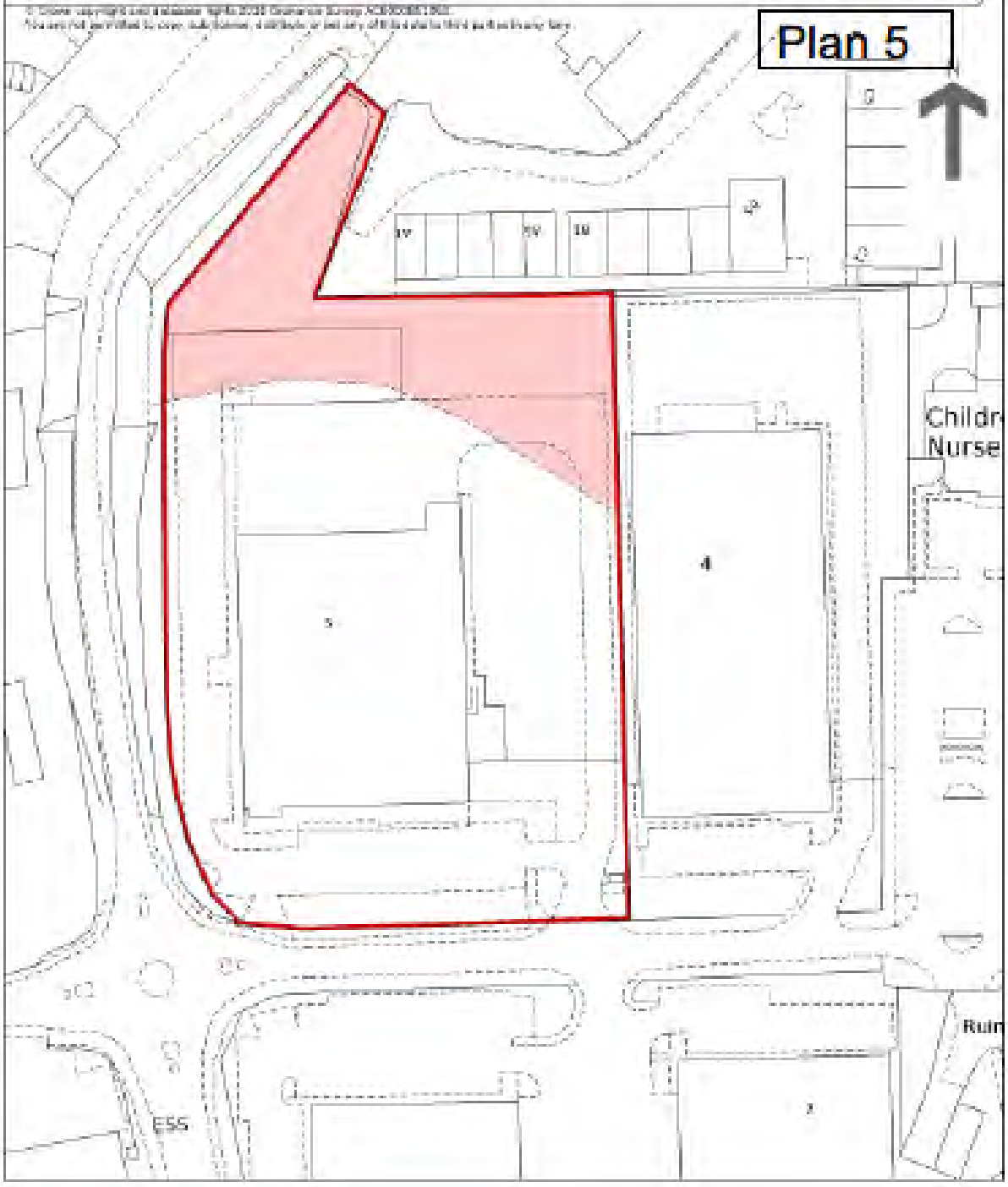
1. **FOR THE PURPOSE OF PROTEST OR SABOTAGE ENTER OCCUPY OR REMAIN ON THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 5 BEING MOOG INDUSTRIAL GROUP, ASHCHURCH PARKWAY, TEWKESBURY, GLOUCESTERSHIRE, GL20 8TU**
2. **DELIBERATELY AND WITH KNOWLEDGE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 5**
3. **INTERFERE OR ATTEMPT TO INTERFERE WITH ANY OF THE SERVICES SERVING THE LAND AND PREMISES SHOWN EGDED 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 (including the amendments made to the persons subject to the Order and the ~~re-~~re-amended claim form and re-re-amended particulars of claim) can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com:

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**



This official copy is incomplete without the preceding notes page.

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

Amended pursuant to the order of Thompsell HJ dated 6 October 2025, made pursuant to CPR 17.3

Claim Form (CPR Part 8)

In the High Court of Justice Business and Property Division	
Claim no.	PT-2025-000910
Fee Account no.	
Help with Fees - Ref no. (if applicable)	H W F – –

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

SEAL

Defendant(s)
First, Second, Third, Fourth and Fifth Defendants (Persons Unknown (See Schedule 1))
Hanah Yun Stevens (Sixth Defendant)
Bea Sherman (also known as Frank Sherman) (Seventh Defendant)
Iain Evans (Eighth Defendant)
Hisham Alkhamesi (Ninth Defendant)

Does your claim include any issues under the Human Rights Act 1998? ☐ Yes ☑ No

Details of claim (see also overleaf)
See attached Re-Re-Amended Particulars of Claim.

Defendant's name and address: See Schedule 1

	£
Court fee	646
Legal representative's costs	
Issue date	2 October 2026

For further details of the courts www.gov.uk/find-court-tribunal.
When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

© Crown copyright 2020

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

Claim no.	PT-2025-000910

Details of claim (continued)

See attached Re-Re-Amended Particulars of Claim.

Moog Wolverhampton Limited
Valiant Way
Wolverhampton
West Midlands
United Kingdom WV9 5GB

MoogLegal@moog.com

Claimant's or claimant's legal representative's address to which documents should be sent if different from overleaf. If you are prepared to accept service by DX, fax or e-mail, please add details.

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

Statement of Truth

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.

☐ **I believe** that the facts stated in these particulars of claim are true.

☑ **The Claimant believes** that the facts stated in these particulars of claim are true. **I am authorised** by the claimant to sign this statement.

Signature

Signed by:
Elwira J. Kelly
92C7F87347624E7...

☑ Claimant

☐ Litigation friend (where claimant is a child or a Protected Party)

☐ Claimant's legal representative (as defined by CPR 2.3(1))

Date

Day	Month	Year
02	10	2026

Full name

Elwira Kelly

Name of claimant'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

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

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

SCHEDULE 1 - LIST OF DEFENDANTS

(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

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

Plan 1



Case Reference: 1H5451.000327 updated plan

M O O G
Valiant Way
Wolverhampton
WV9 5GB

©Crown copyright and database rights 2025. OS AC0000850529

Ordnance Survey
Licensed Data

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

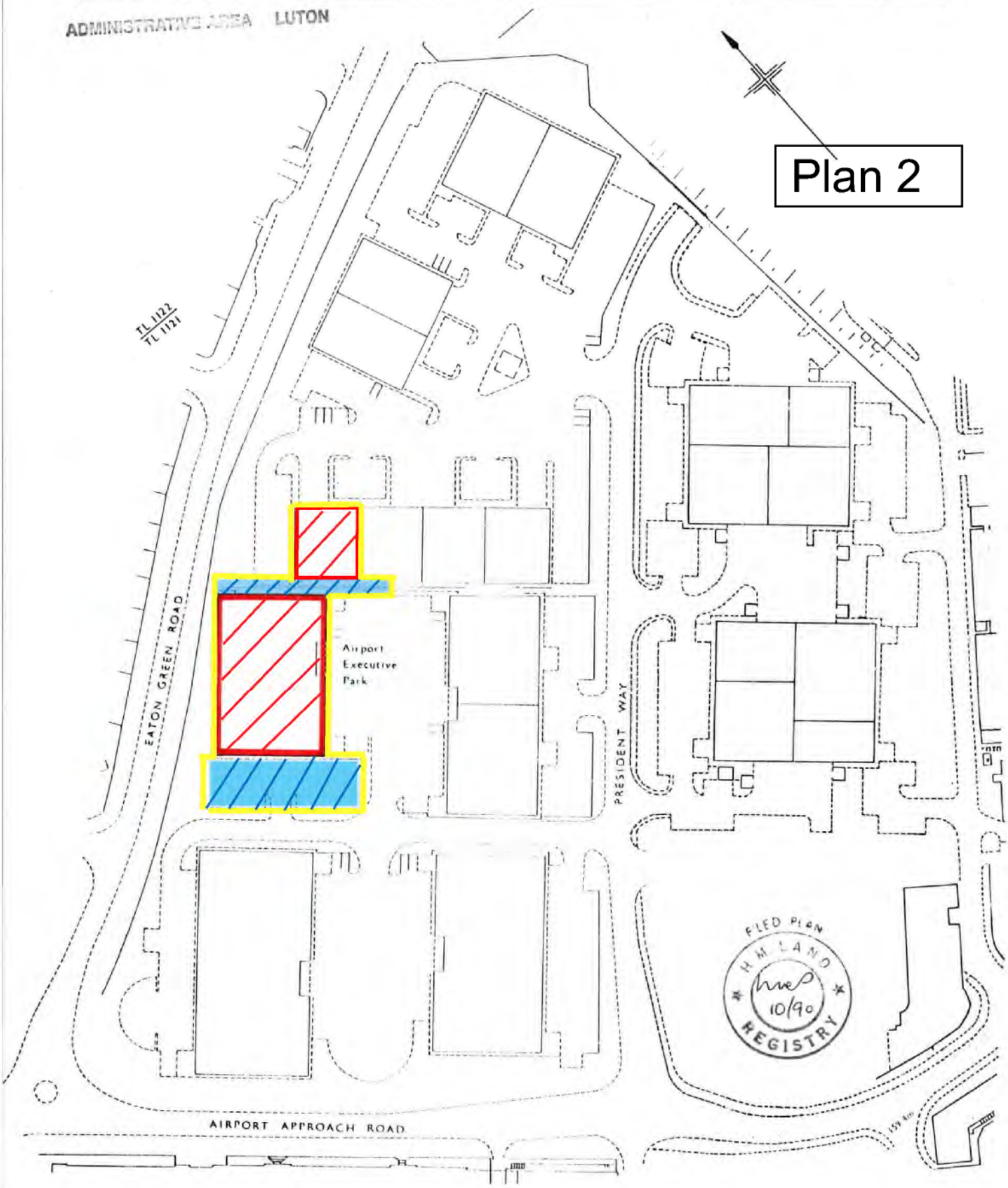
H.M. LAND REGISTRY

TITLE NUMBER	
BD154447	

ORDNANCE SURVEY PLAN REFERENCE	TL 1121	SECTION C	Scale 1/1250
~~COUNTY BEDFORDSHIRE~~	~~DISTRICT LUTON~~		© Crown copyright

ADMINISTRATIVE AREA LUTON

Plan 2



This official copy is incomplete without the preceding notes page.

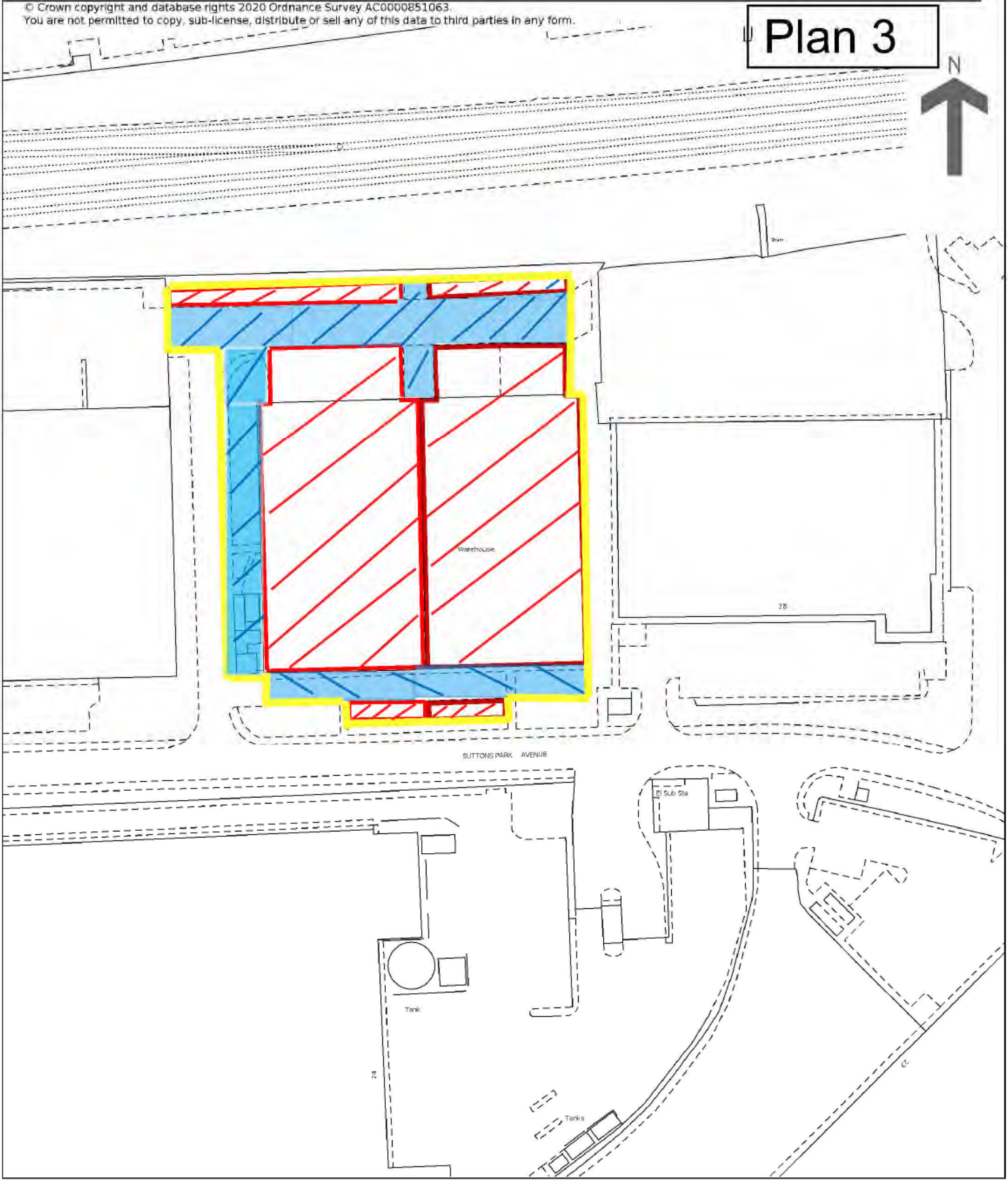
Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

HM Land Registry
Official copy of title plan

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

© Crown copyright and database rights 2020 Ordnance Survey AC0000851063.
You are not permitted to copy, sub-license, distribute or sell any of this data to third parties in any form.

Plan 3



This official copy is incomplete without the preceding notes page.

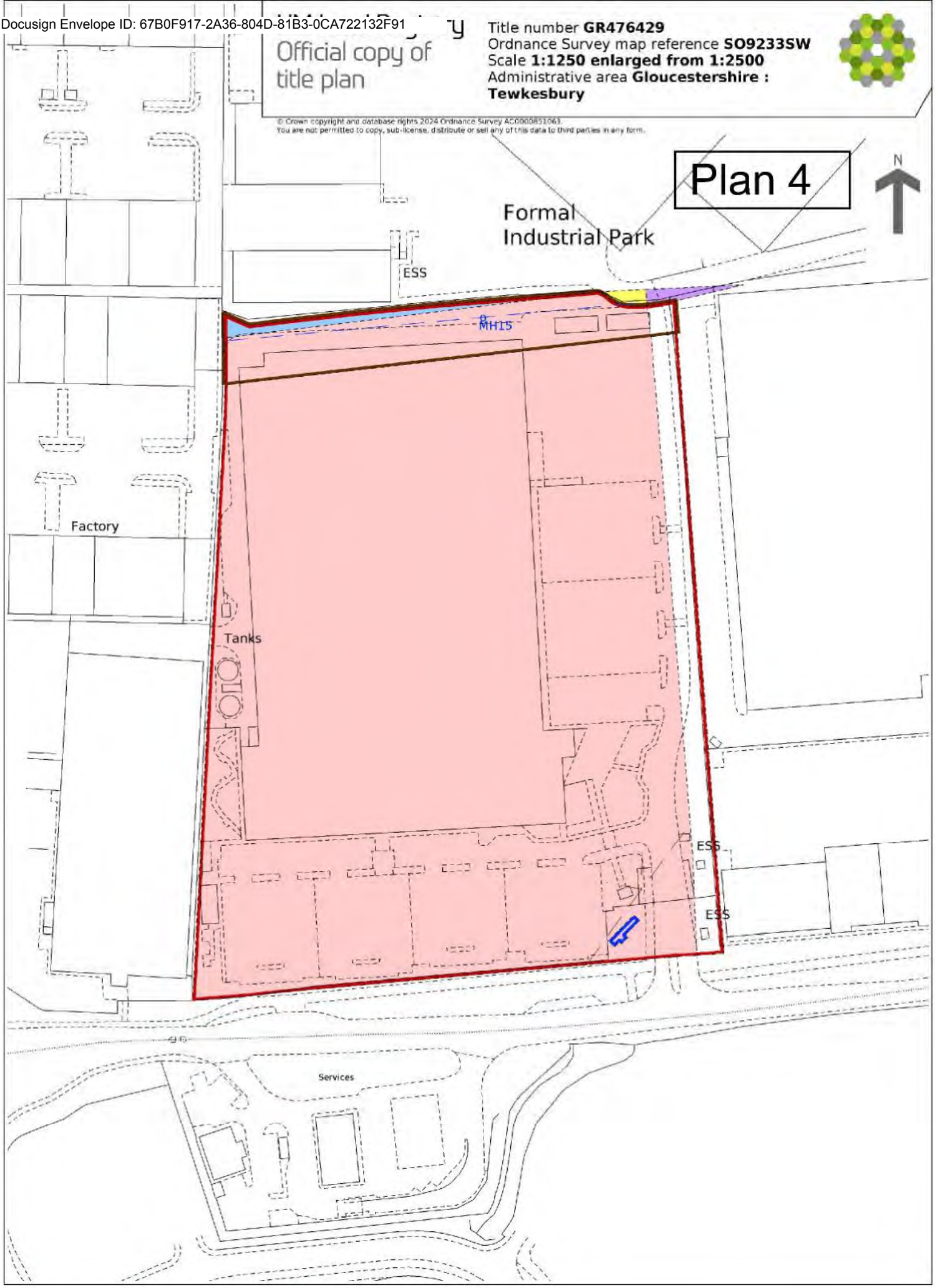
Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

Official copy of title plan

Title number **GR476429**
Ordnance Survey map reference **SO9233SW**
Scale **1:1250 enlarged from 1:2500**
Administrative area **Gloucestershire : Tewkesbury**

© Crown copyright and database rights 2024 Ordnance Survey AC0000851063.
You are not permitted to copy, sub-license, distribute or sell any of this data to third parties in any form.

Plan 4



This official copy is incomplete without the preceding notes page.

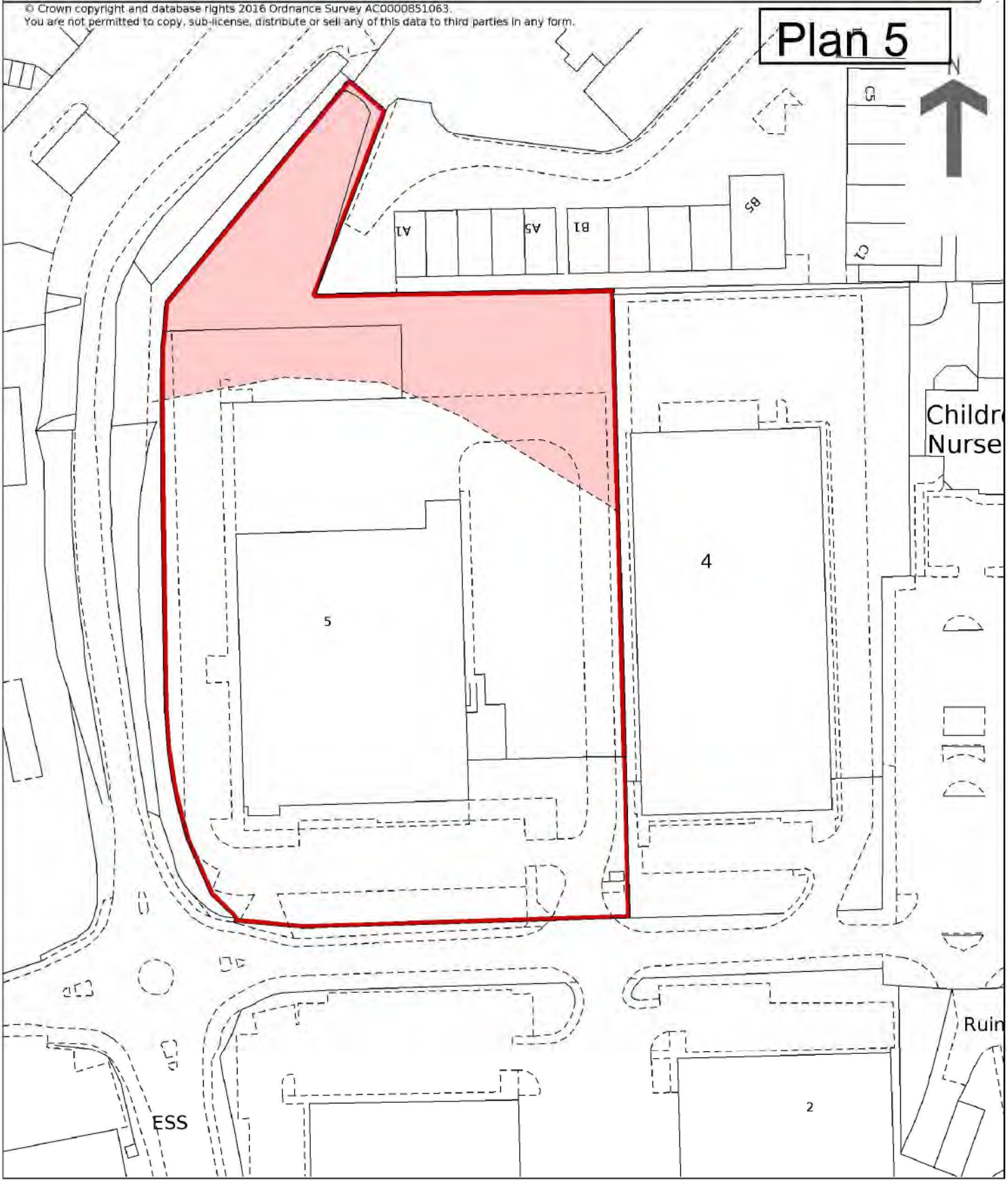
Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

HM Land Registry
Official copy of title plan

Title number **GR395822**
Ordnance Survey map reference **SO9233SW**
Scale **1:1250 enlarged from 1:2500**
Administrative area **Gloucestershire : Tewkesbury**

© Crown copyright and database rights 2016 Ordnance Survey AC0000851063.
You are not permitted to copy, sub-license, distribute or sell any of this data to third parties in any form.

Plan 5



This official copy is incomplete without the preceding notes page.

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

Claim No: PT-2025-000910

IN THE HIGH COURT OF JUSTICE

~~CHANCERY~~ BUSINESS AND PROPERTY DIVISION

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 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

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

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 PRE

(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 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

(6) 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

(7) HANAH YUN STEVENS

(8) BEA SHERMAN (ALSO KNOWN AS FRANK SHERMAN)

(9) IAIN EVANS

(10) HISHAM ALKHAMESI

Defendants

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

RE - RE-AMENDED PARTICULARS OF CLAIM UNDER CPR ~~r.17.1(1)~~ r.17.1(2)(b)

DATED ~~5 SEPTEMBER 2025~~7 OCTOBER 2025 2 OCTOBER 2026

THE CLAIMANTS

1. The Claimants are UK subsidiaries of Moog Inc, an American based company which designs and manufactures controls and systems for aerospace, defence, industrial, and medical applications. Companies within the Moog Inc group, including the Claimants, hold contracts with various military aircraft end users (amongst other clients).

THE LAND TO WHICH THE CLAIM RELATES

2. The First Claimant is the freehold owner of the site known as Moog Aircraft Group Wolverhampton, Valiant Way, Pendeford, Wolverhampton, WV9 5GB, title to which is registered at HM Land Registry under title numbers SF470338, SF498970, SF606388 and SF694209 ("the Wolverhampton Land"). The part of the Wolverhampton Land over which Moog seeks this injunction consists of the land shown edged red on Plan 1 annexed to these Re-Re-Amended Particulars of Claim (the "Wolverhampton Site").

3. The Wolverhampton Site comprises a large industrial building with parking and circulation space enclosed by security fencing. The site is used for the manufacture of primary and secondary flight control actuators for military and commercial end use.

4. The airspace above the building is subject to a lease between the First Claimant and Centrica Business Solutions (Generation) Limited ("Centrica") dated 1 May 2024 by which Centrica is granted rights to (inter alia) install and maintain solar panels on the roof of the building, together with associated rights of access for the purpose of exercising its rights under the lease ("the Airspace Lease"). The premises demised to Centrica do not include the roof of the building itself.

5. The Second Claimant is the registered leasehold proprietor of the site known as Moog Controls Ltd Luton, Units C and J Airport Executive Park, President Way, Luton, LU2 9NY ("the Luton Site").

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

6. The Luton Site comprises two units on the Airport Executive Park, being Units C and J (the "Units"), separated by a strip of land which is retained by the freehold owner but over which the Second Claimant enjoys rights of access in common with the landlord. The Units are primarily accessed via a car park to the south of Unit C which comprises a number of parking spaces in which the Second Claimant is granted the right to park under Schedule 2 of the Unit C Lease. Other parking spaces and loading areas located to the east of Unit C and to the west and north of Unit J are also used in connection with the Units. The Second Claimant's title to Units C and J are registered at HM Land Registry under title numbers BD154446 and BD154447.

7. The Luton Site is shown edged yellow on Plan 2 annexed to these Re-Re-Amended Particulars of Claim. The areas demised to the Second Claimant are shown hatched red. The strip separating Units C and J, ~~and~~ the car park and loading area to the south and east of Unit C, and the car park and loading area to the west and north of Unit J is shown shaded and hatched blue.

8. The Luton Site manufactures Foreign Object Debris detection systems that are used for airfield management purposes.

9. The Third Claimant is the registered leasehold owner of the site known as Moog Reading Limited, 30 Suttons Business Park, Reading, Berkshire, RG6 1AW ("the Reading Site"). The Reading Site comprises two conjoined warehouse units, units 29 and 30 together with parking spaces. Title to the demised premises is registered at HM Land Registry under title numbers BK501720 and BK501808.

10. The warehouse units are separated from the demised car parking to the north of the units by an estate road and circulation spaces/forecourt and from the demised car parking to the south of the units by an estate road. Those areas are not demised to the Third Claimant but are common parts of the Business Park over which the Third Claimant enjoys rights in connection with the permitted user of the demised premises and in common with others. The Reading Site is shown edged yellow on Plan 3 annexed to these Re-Re-Amended Particulars of Claim. The areas demised to the Third Claimant are shown hatched red. The common parts over which the Third Claimant

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

enjoys rights in connection with the use of the demised premises are shown shaded and hatched blue.

11. The Reading Site ~~is~~ was used for the manufacture of slip rings, motor controls and fibre optic components.

12. The Fourth Claimant is the leasehold owner of the site known as Moog Aircraft Group Tewkesbury, Ashchurch, Tewkesbury, Gloucestershire, GL20 8NA, the title to which is registered at HM Land Registry under title number GR476429 ("the Tewkesbury Aircraft Site"). The Tewkesbury Aircraft Site is shown edged red on Plan 4 annexed to these Re-Re-Amended Particulars of Claim.

13. The Tewkesbury Aircraft Site comprises a large building, with both warehouse and office premises, together with car parking and circulation space. It is enclosed by security fencing. The site is used for the manufacture of electro-hydraulic servo valves and braking and steering control manifolds.

14. The Fourth Claimant is also the leasehold owner of the site known as Moog Industrial Group, Ashchurch Parkway, Tewkesbury, Gloucestershire, GL20 8TU, title to which is registered at HM Land Registry under title number GR395822 ("the Tewkesbury Industrial Site"). The Tewkesbury Industrial Site is shown edged red on Plan 5 annexed to these Re-Re-Amended Particulars of Claim.

15. The Tewkesbury Industrial Site comprises a building with office and factory use with parking and circulation spaces. The site is used for the manufacture of servovalves, actuators and control system manifold assemblies for a variety of industrial end markets.

16. In these Re-Re-Amended Particulars of Claim, the Wolverhampton Site, the Luton Site, the Reading Site, the Tewkesbury Aircraft Site and the Tewkesbury Industrial Site are referred to collectively as "the Moog Sites" where appropriate.

17. The claim is not for injunctive or other relief in relation to any residential property.

THE THREAT

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

18. Palestine Action is a pro-Palestine direct action protest group which describes its aims as being "to take direct action against Israel's arms trade in Britain[1]" and to target property and premises belonging to corporate actors seen as aiding and abetting violations of international law by Israel against the Palestinian people. It is a proscribed organisation under the Terrorism Act 2000 ("the Act") with effect from 5th July 2025.

19. Palestine Action or individuals associated with, or espousing causes similar to those of Palestine Action, have undertaken unlawful direct action against a number of companies who are alleged to have supplied aircraft parts or equipment for ultimate use by Israel and/or the Israel Defense Forces ("the IDF") as an end user.

20. In particular, a website entitled "Declassified UK" has in the past published articles naming companies with operational sites situated in the UK which are alleged to supply components to the IDF. In relation to the following companies, such publication has been associated with such unlawful direct action being taken soon afterwards against operational sites of the companies in question:

    (i) BAE Systems Plc;
    (ii) Martin-Baker Limited;
    (iii) UAV Engines Limited;
    (iv) Instro Precision Limited; and
    (v) Permoid Industries Limited.

21. On 10 July 2025, the Declassified UK website published an article under the headline "Israeli fighter pilots training with UK equipment", including, but not limited to, allegations that:

    (i) "Moog" had designed the flight control system for the "M-346 Lavi", which was described as "a high-performance aircraft designed to train Israeli pilots to fly advanced fighter jets including the F-16 and F-35" and provides maintenance services for the aircraft;

[1] Ammori v Secretary of State for the Home Department [2025] EWHC 1708 at 8.

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

(ii) F-16 fighter jets had been used by Israeli forces last year "to bomb a residential compound in Gaza housing UK charity Medical Aid for Palestinians, injuring four British doctors" and that "F-35s have also been used to commit war crimes in Gaza, including an airstrike on a designated safe zone which killed 90 people";

(iii) "In addition to supplying parts for the M-346 Lavi, Moog has contributed to the global F-35 programme";

(iv) "Moog has sent at least ten shipments to Hatzerim airbase since December 2024"; and

(v) Specifically, the First Claimant had "sent at least ten shipments to Israel's Hatzerim airbase since December", and "was on the most recent list of UK-based companies which have received arms export licences for the international F-35 programme."

22. The First Claimant is also identified on the Campaign Against Arms Trade ("CAAT") website as a company which makes components for F-35s and as a company which holds an "Israeli military export licence". A search for "Moog" on the CAAT website identifies the addresses of two of the Moog Sites.

23. In the early hours of Tuesday 26th August 2025, the Sixth, Seventh, Eighth and Ninth Defendants, ~~four individuals~~ who claimed~~ing~~ to be associated with a group called "Palestinian Martyrs for Justice", broke into the Wolverhampton Site by ramming a vehicle into the front gates and then driving through an internal automatic barrier into the Logistics Entrance to the site. Thereafter, they climbed onto the roof of the main building, causing significant damage to the building and solar panels installed upon its roof and considerable disruption to the First Claimant's business operations.

24. By reason of the foregoing facts and matters, some or all of the Moog Sites are highly likely to be the subject of unlawful direct action; and, further or alternatively, the Claimants reasonably so apprehend.

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

CAUSES OF ACTION

25. The Claimants apprehend that, unless restrained by the Court, persons unknown having sympathies for causes similar to those espoused by (among others) Palestine Action, and the Sixth to Ninth Defendants, will conduct themselves in such a way as to amount to trespass and/or nuisance at one or more or all of the Moog Sites.

26. Members of the public have no consent or permission to enter upon the Moog Sites. The Claimants have not given any permission, consent or licence to any person to enter onto the Moog Sites other than in connection with the lawful operation of those sites and, in respect of the Wolverhampton Site, for the exercise of the rights to Centrica under the Airspace Lease. In particular, the Claimants have not given any permission, consent or licence to members of the public to enter onto the Moog Sites for the purpose of protest, direct action or other protest activity whether associated with the causes espoused by (among others) Palestine Action or otherwise. Nor have they given any permission, consent or licence to the Sixth to Ninth Defendants to enter onto the Moog Sites for any purpose whether individually or collectively.

27. Accordingly:

    (i) entry onto, occupation of, or remaining on the Moog Sites, or any of them; or

    (ii) climbing, 'locking on' (by whatever means) to any part thereof, causing damage such as by smashing of windows or external equipment, spray-painting, pouring, depositing, throwing or affixing anything; or

    (iii) in respect of the Wolverhampton Site and the Tewkesbury Aircraft Site (which are enclosed by their own fences) the climbing, cutting or spray-painting of, the "locking on" to (by whatever means) or pouring, depositing, throwing, or affixing anything to the fencing surrounding those sites,

    would therefore constitute a trespass, which the Claimants are entitled to injunctive relief to restrain.

28. Further, the Claimants seek injunctive relief to restrain:

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

(i) The obstruction or interference, or attempted obstruction or interference, of access to or egress from the Moog Sites, with or without vehicles, by the Claimants, their agents, employees, contractors, customers, suppliers or other licensees; and

(ii) the interference with any of the services serving the Moog Sites, including but not limited to water and/or sewerage pipes.

Any such interference would constitute a trespass, alternatively a nuisance and the relief sought is necessary and proportionate in order to give effective protection to the Claimants' rights as landowners in respect of the Moog Sites.

29. The Second Claimant also seeks injunctive relief in respect of the area shown shaded and hatched blue on Plan 2, being (i) the strip of land separating the Units and (ii) ~~the car parking spaces and loading bays adjoining Unit C which is used with to access~~ parking areas and loading bays used with the Units. It is not asserted in these proceedings that the Second Claimant is the person entitled to sufficient possession or control of those areas to maintain a cause of action in trespass in relation thereto. However:

(i) the relief claimed in relation the areas shown shaded and hatched blue on Plan 2 is no more than is necessary and proportionate in order to give effective protection to its rights as landowner to restrain trespass on the Luton Site;

(ii) further or alternatively, such relief is required in order to restrain acts of nuisance, or threatened nuisance, within the areas shaded and hatched blue which would interfere with the Second Claimant's use and enjoyment of the Luton Site or which would threaten to do so.

30. On the like basis, the Third Claimant also seeks injunctive relief in respect of the areas shown shaded and hatched blue on Plan 3, being the estate road and/or circulation spaces/forecourt/additional car parking spaces separating the warehouse units from the demised car parking spaces within the Reading Site.

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

HUMAN RIGHTS

31. Reliance by the Defendants on ~~of~~ rights of freedom of expression and / assembly under Articles 10 and/or 11 of the European Convention of Human Rights would not provide a defence in the particular circumstances of this case.

THE RELIEF SOUGHT

32. The Claimants therefore seek~~s~~ the following Orders:

(i) An order restraining the First, Sixth, Seventh, Eighth and Ninth Defendants from:

(1) entering, occupying or remaining upon or damaging the land and premises shown edged red on Plan 1 being the Wolverhampton Site 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);

(2) obstructing or interfering with or attempting to obstruct or interfere with access to or egress from the Wolverhampton Site, with or without vehicles, by the First Claimant, its agents, employees, contractors, customers, suppliers, or other licencees.

(ii) An order restraining the Second, Sixth, Seventh, Eighth and Ninth Defendants from:

(1) entering, occupying or remaining upon or damaging the land and premises shown edged yellow on Plan 2 being the Luton Site (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);

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

(2) obstructing or interfering with or attempting to obstruct or interfere with access to or egress from the Luton Site, with or without vehicles, by the Second Claimant, its agents, employees, contractors, customers, suppliers or other licencees.

(iii) An order restraining the Third, Sixth, Seventh, Eighth and Ninth Defendants from:

(1) entering, occupying or remaining upon or damaging the land and premises shown edged yellow on Plan 3 being the Reading Site (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);

(2) obstructing or interfering with or attempting to obstruct or interfere with access to or egress from the Reading Site, with or without vehicles, by the Third Claimant, its agents, employees, contractors, customers, suppliers or other licencees.

(iv) An order restraining the Fourth, Sixth, Seventh, Eighth and Ninth Defendants from:

(1) entering, occupying or remaining upon or damaging the land and premises shown edged red on Plan 4 being the Tewkesbury Aircraft Site 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);

(2) obstructing or interfering with or attempting to obstruct or interfere with access to or egress from the Tewkesbury Aircraft Site, with or without vehicles, by the Fourth Claimant, its agents, employees, contractors, customers, suppliers or other licencees.

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

(v) An order restraining the Fifth, Sixth, Seventh, Eighth and Ninth Defendants from:

(1) entering, occupying or remaining upon or damaging the land and premises shown edged red on Plan 5 being the Tewkesbury Industrial Site (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);

(2) obstructing or interfering with or attempting to obstruct or interfere with access to or egress from the Tewkesbury Industrial Site, with or without vehicles, by the Fourth Claimant, its agents, employees, contractors, customers, suppliers or other licencees.

(vi) An order restraining the Defendants from interfering or attempting to interfere with services serving the Moog Sites including, but not limited to, water and/or sewerage pipes;

(vii) Further or other relief as the Court sees fit; and

(viii) Costs.

I believe that the facts stated in this Re-Re-Amended Particulars of Claim 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 by:
Signed …Elwira J. Kelly……
92C7F87347624E7...
Elwira Kelly

DATED this 2nd day of October 2026.

Docusign Envelope ID: 61EB72FE-75F5-4F81-88DE-A2DF48792418

Elwira Kelly
Claimant
First Statement
4 September 2025
Exhibit "EK1"

IN THE HIGH COURT OF JUSTICE **CLAIM NO.**

CHANCERY 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 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

Docusign Envelope ID: 61EB72FE-75F5-4F81-88DE-A2DF48792418

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 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 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

WITNESS STATEMENT OF ELWIRA KELLY

INTRODUCTION

1. I am Elwira Kelly of 400 Jamison Road, Elma, New York 14059 USA . I am, and have been since 2024, Senior Vice President, General Counsel, and Corporate Secretary at Moog, Inc ("**Moog**"). My role involves overseeing all legal matters within the Moog organisation and providing legal and strategic advice to the Moog board. That includes managing legal disputes and co-ordinating litigation, including the present matter, which I have been responsible for handling within Moog at a corporate level.

2. I make this witness statement in connection with the Claimants' application for an order for an injunction to restrain protestors from entering, occupying, or remaining on any part of the Moog group's UK sites, which are listed below (the **"Sites"**), and attempting to interfere with the services on the Sites. Plans of the Sites over which Moog seeks this injunction are at pp. 2 – 6.

3. I am authorised by the Claimants to make and give this statement on their behalf.

Docusign Envelope ID: 61EB72FE-75F5-4F81-88DE-A2DF48792418

4. The facts in this witness statement are true to the best of my knowledge, information and belief. Where such matters are not within my own personal knowledge, I have stated the source of such matters information and belief.

5. For the purposes of preparing this witness statement, I have been provided with information from employees of Moog and its subsidiaries in the UK who have first-hand knowledge of Sites, including ownership, current operations, security set up, health and safety and the recent events of unauthorised personnel unlawfully accessing one of the Sites for the purpose of protest. In the interests of their personal security, given the nature of the Defendants in these proceedings, and the potential risk to these individuals' safety should they be identified, I have deliberately not included identifying factors (including names or job titles, as most, if not all, of these jobs titles are held by one person at each of the Sites and so the individuals holding that role could be easily identified with an online search) for these employees in this statement.

6. On the advice of Staffordshire Police (the **"Police"**), I have also not named the solicitors with conduct of this matter on behalf of Moog. I understand that firms and individuals involved in similar claims for other companies have been the target of physical and personal attacks as a result of their work on the relevant claims.

7. I have also, given the nature of the security threat against Moog, deliberately provided sufficient information to describe the physical layout of the Sites and explain the nature of Moog's operations at the Sites but not, as the Court will appreciate, reveal certain details that might be used by the Defendants to facilitate or encourage further unlawful protest action targeted at the Sites or more generally against Moog and its interests. I can, however, provide further information as the Court may require should that be necessary in order to grant the relief that Moog seeks.

8. There is exhibited to this witness statement a bundle of true copy documents marked "EK1." References to page numbers in this witness statement are to page numbers found in the bottom right hand corner of exhibit EK1.

THE CLAIMANTS

9. The Claimants are subsidiaries of Moog. They are as follows:

   (a) Moog Wolverhampton Limited (company number 07008386) whose registered address is at Valiant Way, Wolverhampton, West Midlands, WV9 5GB ("**Moog Wolverhampton**");

   (b) Moog Controls Limited (company number 01171948) whose registered address is at Ashchurch, Tewkesbury, Gloucestershire, GL20 8NA ("**Moog Controls**");

Docusign Envelope ID: 61EB72FE-75F5-4F81-88DE-A2DF48792418

(c) Moog Reading Limited (company number 00586505) whose registered address is at 30 Suttons Park Avenue, Suttons Business Park, Reading, Berkshire, RG6 1AW ("**Moog Reading**"); and

(d) Moog Fernau Limited (company number 00989895) whose registered address is at Moog Controls Ltd, Ashchurch, Tewkesbury, GL20 8NA ("**Moog Fernau**").

10. The Claimants are part of the Moog corporate structure, sharing Moog as their ultimate parent company. Moog is a US-based designer and manufacturer of electric, hydraulic and electric, and hydraulic and electro-hydrostatic controls and systems for applications in aerospace, defence, industrial and medical devices. The company is headquartered in New York State but operates globally through various subsidiary companies with sales, engineering, and manufacturing facilities in 26 different countries, including the Sites in the UK.

11. Moog's products are utilised within a range of industries and sectors which include: commercial aircraft, construction, defence, energy, entertainment, industrial machinery, marine, medical OEM, military aircraft, motorsport, oil & gas and space. Amongst its various end users, Moog produces defence products for ultimate use by the UK Ministry of Defence ("**MoD"**).

12. The Claimants seek a without notice injunction to restrain acts of nuisance and trespass at the Sites following violent protest activity at the Wolverhampton Site on 26 August 2025 (the **"Incident"**). I describe the Incident, and the damage and disruption caused by the Incident, in further detail below.

13. For ease, I collectively refer to Moog and its group companies, including the Claimants, in this statement simply as "Moog".

THE SITES

14. The Sites in relation to which the Claimants seek injunctive relief are:

(a) Valiant Way, Wolverhampton WV9 5GB, registered at HM Land Registry with title numbers SF498970, SF606388, SF470338, and SF694209 (the **"Wolverhampton Site"**);

(b) Ashchurch, Tewkesbury, Gloucestershire, GL20 8NA, registered at HM Land Registry with title number GR476429 (the **"Tewkesbury (Commercial Aircraft) Site"**);

Docusign Envelope ID: 61EB72FE-75F5-4F81-88DE-A2DF48792418

(c) Unit 5 Ashchurch Parkway, Tewkesbury, Gloucestershire, GL20 8TU registered at HM Land Registry with title number GR395822 (the **"Tewkesbury (Industrial) Site"**);

(d) Units 29 and 30 Suttons Business Park, Reading, Berkshire RG6 1AQ, registered at HM Land Registry with title numbers BK501720 and BK501808 (the **"Reading Site"**); and

(e) Units C and J Airport Executive Park, President Way, Luton LU2 9NY, registered at HM Land Registry with title numbers BD154446 and BD154447 (the **"Luton Site"**).

15. Below are further details regarding each of the Sites, the Claimants' ownership of the Sites, and the extent of the Claimants' demise.

The Wolverhampton Site

16. Moog Wolverhampton holds the freehold titles to the Wolverhampton Site and the land surrounding the Wolverhampton Site. Copies of the Land Registry titles and title plans of the land owned by Moog are at pp. 7 – 25. The plan showing the redline boundary of the Wolverhampton Site, over which Moog seeks this injunction, is at p. 2. I have been provided with further information about the Wolverhampton Site by persons with the appropriate roles who are employed by Moog at the Wolverhampton Site.

17. The Wolverhampton Site comprises a large industrial building with a Gross External Area of 220,000 sq ft and a Net Internal Area of 170,000 sq ft useable space.

18. The Wolverhampton Site is used for the manufacture of primary and secondary flight control actuators for military and commercial end use. Services provided from the Wolverhampton Site also include aftermarket service support including repair, overhaul and sales of parts of products manufactured. There is a total of 516 employees (including contractors) at the Wolverhampton Site, with various shift patterns, although people are present on site to varying degrees 24-hours per day.

19. The Wolverhampton Site is a fenced property with 'Euroguard Regular' mesh fencing around the perimeter.

20. The boundaries to the Wolverhampton Site are (in general terms) formed by Valiant Way to the North, Innovation Drive to the West, the Staffordshire and Worcestershire Canal to the East and Wobaston Road to the South. There are three separate entrances to the Wolverhampton Site, all of which are gated: the main entrance, a separate employee-only vehicle entrance (the "**Employee Entrance**") and a logistics entrance (the **"Logistics**

Docusign Envelope ID: 61EB72FE-75F5-4F81-88DE-A2DF48792418

Entrance"). There are also gated partitions between the main car park, accessible from the main entrance, and the side car park accessed from the Employee Entrance.

21. A "Paxton" swipe card control access is in place for all external doors leading into the building.

22. The airspace of the Wolverhampton Site, extending to 5 metres above the roof, is leased by Moog Wolverhampton to Centrica Business Solutions (Generation) Limited ("**Centrica**") for the installation of solar panels pursuant to a lease dated 1 May 2024 and made between (1) Moog Wolverhampton Limited and (2) Centrica Business Solutions (Generation) Limited for a term of 27 years (the "**Centrica Lease**") (pp. 26 – 28). Centrica has a right under the Centrica Lease to enter the Wolverhampton Site, with or without vehicles, plant, machinery and equipment, but specifically for the purposes of exercising its rights under the Centrica Lease, including the right to install and maintain the solar panels (the **"Solar Panels"**), lay cables and so on. Photographs of the Solar Panels (prior to the events described below) are at pp. 29 – 32.

23. Health and safety on the Wolverhampton Site, as at all Sites, is paramount. Due to the nature of the heavy machinery manufactured at the Wolverhampton Site, Moog operates a policy whereby safety glasses and safety shoes must be worn in all shop floor areas. Examples of the types of machinery present on the Wolverhampton Site include fork lift trucks, delivery vehicles, grinding and milling machines, overhead cranes, which commonly move between one and five tonnes of materials and equipment, and large furnaces.

24. There are also various chemicals kept on the Wolverhampton Site, some of which could be extremely hazardous to health or the environment should they be accidentally or purposefully tampered with. Contact with these could cause serious burns and other injuries.

25. As in the case of all Sites, only trained and authorised personnel are allowed to access the roof of the Wolverhampton Site. Authorised individuals undergo an induction programme, which involves understanding a risk assessment, training for working at height, and following a safe system of work, before a permit for roof access is issued. Moog operates a "ManSafe" system for working at height across its Sites, which requires all personnel accessing the roof to wear personal protective equipment (**"PPE"**). The PPE must include harnesses and a radio. The risk of not wearing appropriate PPE is that there is a greater risk of falling from the edge of the roof, which could be fatal.

26. The roof has an aviator safety line system installed. Authorised personnel are required to use this system and harnesses when accessing the roof, and must avoid stepping on the solar panels. For reasons of safety and load capacity, it is Moog's policy that drones are

Docusign Envelope ID: 61EB72FE-75F5-4F81-88DE-A2DF48792418

used for general inspection purposes. Access to the roof is limited to no more than five people at any one time.

27. Due to the safety hazards at the Wolverhampton Site, Moog requires PPE to be worn in all manufacturing areas, including safety shoes, safety glasses, high-visibility jackets and overalls. Additional PPE is required for specific areas on the Wolverhampton Site.

28. Only authorised personnel are admitted to the Wolverhampton Site. All employees on the Wolverhampton Site undertake inductions covering environment, health and safety ("**EHS**") in the first two weeks of employment. Contractors are required to undertake the same EHS induction as well as providing risk assessments and method statements. Visitors to the Wolverhampton Site are provided with EHS information and are accompanied at all times.

29. I understand from the Police that, due to the nature of the goods produced at the Wolverhampton Site, the Wolverhampton Site is a 'Prohibited Place' under s.7 of the National Security Act 2023 (**"NSA"**). Nevertheless, the Police have advised Moog to seek an injunction on the terms of this application, and have not suggested that any powers they may derive under the NSA in relation to the Wolverhampton Site are adequate alternatives to the injunction sought.

The Tewkesbury (Commercial Aircraft) Site

30. Moog Controls hold a leasehold interest in the Tewkesbury (Commercial Aircraft) Site. The freehold proprietor is Uttlesford District Council, which is the landlord under a lease dated 15 August 2023 and made between (1) Uttlesford District Council (2) Moog Controls Limited and (3) Moog Inc.

31. A copy of Moog Controls' leasehold title and title plan for the Tewkesbury (Commercial Aircraft) Site are at (pp. 33 - 40).

32. Moog manufactures electro-hydraulic servo valves and braking and steering control manifolds at the Tewkesbury (Commercial Aircraft) Site. These enable high-precision control of position, velocity, pressure and force in a wide range of applications such as flight controls, with products that serve the commercial aerospace and engines markets.

33. The building on the Tewkesbury (Commercial Aircraft) Site is approximately 209,000 sq ft in total, comprising both production and office premises. Around 500 people are employed at the Tewkesbury (Commercial Aircraft) Site, operating across three shifts, although, again, people are present on site to varying degrees 24 hours per day.

34. Access to the building is gained through either a pedestrian gate from the highway for employees, or via an automatic number plate recognition (ANPR) barrier gate for visitors.

Docusign Envelope ID: 61EB72FE-75F5-4F81-88DE-A2DF48792418

The perimeter of the site is fenced. Moog employs Carlisle Security to provide security on site 24 hours a day.

The Tewkesbury (Industrial) Site

35. Moog Controls also holds the leasehold interest in the Tewkesbury (Industrial) Site, which also specialises in manufacturing equipment for the commercial aerospace industry. The freehold proprietor is Diageo Pension Trust (Property Custodian) Limited, which is the landlord under a lease dated 6 July 2015 and made between (1) Ashchurch 9 Limited and (2) Moog Controls Limited for a term of 20 years from 6 July 2015.

36. A copy of Moog Controls' leasehold title and title plan for the Tewkesbury (Industrial) Site is at (pp. 41 – 47).

37. The Tewkesbury (Industrial) Site is used to manufacture servovalves, actuators, and control system manifold assemblies – selling into various industrial end markets: including industrial automation, automotive, motorsport, industrial machinery amongst others.

38. The building on the Tewkesbury (Industrial) Site is approximately 45,000 sq ft, comprising both production and office premises. Around 120 people are employed at the Tewkesbury (Industrial) Site, across three shifts, although, as before, people are present on site to varying degrees 24 hours per day.

39. Access to the building is gained through the car park to facilitate employee access, deliveries and shipments.

The Reading Site

40. Moog Reading holds the leasehold interest in the Reading Site. The freehold proprietor is Phoenix Life Limited ("**Phoenix**"), which is the landlord under leases of Unit 29 (formerly known as Units 29(a) and 29(b)), Suttons Business Park, Reading, Berkshire dated 1 July 2019 and made between (1) Standard Life Assurance Limited and (2) Moog Reading Limited, and Unit 30, Suttons Business Park, Reading, Berkshire dated 1 July 2019 and made between (1) Standard Life Assurance Limited and (2) Moog Reading Limited.

41. A copy of Moog Reading's leasehold title and title plan for the Reading Site is at (p. 48 – 55)).

42. The Reading Site is used for the manufacture of slip rings, motor controls and fibre optic components. Moog is in the process of closing this facility but Moog Reading will continue to occupy the Reading Site until at least mid-2026.

Docusign Envelope ID: 61EB72FE-75F5-4F81-88DE-A2DF48792418

43. The Reading Site consists of two adjacent units, totalling approximately 65,000 sq ft, comprising both production and office premises. Around 130 people are employed at the Reading Site, across three shifts.

44. Access to the building is gained through the car park to facilitate employee access, deliveries and shipments. Both facilities at the Reading Site are guarded by security and are access controlled.

45. As indicated above, the Reading Site comprises two adjacent units (pp. 51 and 55). The title plans at pp. 51 and 55 show that in respect of both Unit 29 and Unit 30 there are some gaps between the units. There are also some other strips of land outside of the units that are also demised to Moog (hatched red on the plan at p.4). The strips are car parking spaces and the gaps (shaded and hatched blue on the plan at p.4) are additional car parking and/or circulation spaces that are part of Phoenix's freehold but used by Moog employees and visitors. Since these gaps sit between areas demised to Moog, they are at risk of incursion by any protestors that may target the Reading Site and risk compromising the operations of the whole facility.

The Luton Site

46. Moog Fernau holds the legal title to the leasehold interest in the Luton Site. The freehold proprietor is Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited (together, "**Legal & General**"), which are the landlords under a lease of Unit C Airport Executive Park, Luton and made between (1) Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited and (2) Moog Fernau Limited, and a lease of Unit J, Airport Executive Park, Luton between (1) Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited and (2) Moog Fernau Limited (together, the **"Luton Leases**").

47. The term of the Luton Leases was for ten years from and including 25 December 2014, i.e. they expired on 24 December 2024. Whilst the Luton Leases are subject to the security of tenure provisions of the Landlord and Tenant Act 1954 ("**LTA 1954**"), Legal & General served notices under section 25 of the LTA 1954 specifying 24 December 2024 as the termination date of the tenancies. Legal & General subsequently agreed to extend the time under section 29B(2) of the LTA 1954 for Moog Fernau to apply to the court for new tenancies to 8 September 2025. On 2 September 2025, Legal & General further agreed to extend the time under section 29B(2) of the LTA 1954 for Moog Fernau to apply to the court for new tenancies to 8 October 2025. On that basis, Moog continues to occupy the Luton Site pursuant to the Luton Leases, holding over under the LTA 1954. I understand from a colleague at Moog responsible for dealing with such matters that Moog is in the process of

Docusign Envelope ID: 61EB72FE-75F5-4F81-88DE-A2DF48792418

finalising new leases of the Luton Site with Legal & General. I confirm that Moog has no intention of vacating the Luton Site and so even if it were the case that no new leases of the Luton Site or extensions were granted by 8 October 2025, it would apply to court for new tenancies in order to continue its rights of occupation.

48. On 27 January 2025, Moog Fernau assigned its interests in the Luton Leases to Moog Controls. However, I understand that the transfer of the leasehold titles has not been completed at the Land Registry, meaning that Moog Fernau remains the legal proprietor of the Luton Leases.

49. A copy of Moog Fernau's leasehold titles and title plans for the Luton Site is at (pp. 56 – 65).

50. The Luton Site is used for the manufacture Foreign Object Debris (FOD) detection systems that are used for airfield management purposes.

51. The Luton Site consists of two adjacent units, totalling approximately 25,000 sq ft, comprising both production and office premises. Around 20 people are employed at the site.

52. As can be seen from the Land Registry title plans for the Luton Site (pp. 60 and 65) and the composite plan at Plan 2 (p.3), there is a gap between the footprints of the units that have been demised to Moog, as they are separate buildings, shown hatched blue on Plan 2 (p. 3). This gap forms part of the freehold of Airport Executive Park, belonging to Legal & General. However, since this gap sits between the two units demised to Moog, it is at risk of incursion by any protestors which might target the Luton Site and risks compromising the security of the whole facility.

53. Access to the building entrance on the Luton Site is gained through the car park, shown hatched blue to the south of the two units on Plan 2 (p. 3), which is also used by Moog but not demised to Moog.

THE INCIDENT

54. At approximately 03:50 in the early hours of Tuesday 26 August 2025, four individuals dressed in dark clothing, two male and two female (the **"Perpetrators"**), broke into the Wolverhampton Site by ramming a vehicle into the front gates and then driving through an internal automatic barrier into the Logistics Entrance.

55. Once inside the boundary, the Perpetrators' vehicle was driven to a position close to the main building on the Wolverhampton Site. Three of the Perpetrators exited the vehicle (with the driver remaining in the vehicle) and ran towards the corner of the building. Two of these

Docusign Envelope ID: 61EB72FE-75F5-4F81-88DE-A2DF48792418

Perpetrators approached a metal ladder leading up to the roof of the building. The ladder had a security device on it, secured with a padlock, designed to prevent unauthorised access to the roof. I understand from my colleagues who examined the metal ladder after the Incident that the Perpetrators cut the padlock that attached the security device to the metal ladder (a metal plate "ladder guard"), presumably using a bolt cropper device or similar.

56. Meanwhile, the third Perpetrator lit a red flare and began waving it in the air. The driver of the vehicle stopped the vehicle outside of the metal gates separating the main building from the Logistics Entrance, so that no other vehicles could pass through this entrance. The driver then exited the vehicle and, along with the third Perpetrator, removed a bag. Both then joined the other two Perpetrators at the metal ladder leading to the roof.

57. The four Perpetrators then climbed onto the roof of the main building. They began to damage and destroy windows and the Solar Panels on the roof. In addition, they cut holes in the roof of the facility (about 15 holes in total, each measuring approximately 3ft by 3ft) and cut all of the ManSafe cabling. Photographs showing extensive damage to the Solar Panels and examples of the holes cut by the Perpetrators are exhibited as part of Centrica's report at pp. 66 - 75 (the **"Centrica Report"**), which was prepared by Centrica on 26 August 2025 in order to assess the damage to the Solar Panels and identify the remedial work required. The Incident was captured in CCTV security footage, which has been viewed by a Moog employee involved in the management of the Wolverhampton Site. I am told by them that this shows the vehicle ramming the gates and the Perpetrators cutting the lock on the ladder but there is no footage of the roof (other than that which I am told may have been captured by a police helicopter but which Moog does not have access to). Whilst the tools that the Perpetrators were using are not clear from the CCTV footage, I understand from the Police that roughneck mallets were found at the scene after the Incident, and a photograph of these is exhibited at p. 76. The nature of the damage caused is consistent with the use of this equipment.

58. The Perpetrators also filmed some of the Incident. A video showing the Perpetrators driving through the metal gates at the Logistics Entrance, lighting a red flare, climbing up to the roof, and filming Moog's operations from the roof, can be found here: Palestinian Martyrs for Justice take direct action for Palestine.

59. At the time of the Incident, there were six employees on-site, a Carlisle security officer and four Premier security officers. One security officer observed the vehicle break through the barriers and notified the Police at 03:50. They also contacted their senior control manager and requested four dog handlers. I understand that the Police arrived on site about 10 minutes later. Employees on site were notified when the fire alarm was activated at 04:02.

Docusign Envelope ID: 61EB72FE-75F5-4F81-88DE-A2DF48792418

In the event, there was no confrontation between the Perpetrators and security, and I am not aware whether there was any confrontation with the Police. The Incident lasted until about 09.30 and was eventually resolved when the Police arrested the individuals on the roof.

60. I understand from the Police that the Perpetrators have been charged with conspiracy to commit criminal damage and criminal damage. They have been remanded in custody until 26 September 2025. The case is being reviewed in respect of whether the Perpetrators have committed any offences linked to terrorism. I explain the background to this in more detail below.

61. Copies of some media clippings regarding the Incident are included at pp. 77 - 80.

Property Damage

62. As can be seen from the Centrica Report, the damage is substantial. Moog's employees at the Wolverhampton Site are still assessing the extent of the damage. As a result, I am not able to confirm with certainty the full extent of the damage caused and cost of repair nor an accurate assessment of Moog's financial loss. However, I can confirm that the damage includes the following:

(a) 95% of the Solar Panels on the roof of the building have been destroyed at an estimated approximate value of £700,000 (Moog has requested an actual cost from Centrica).

(b) All windows at roof-level were smashed, about 50 in total, and some of the skylights were also smashed. This caused broken glass to fall into the offices and work spaces below. This includes the Human Resources office, the engineering office, the machine shop, the assembly and testing area, the development and logistics areas, the treatment room, and the archive area. It is not possible to quantify at this time, but I understand from speaking with my colleagues that the eventual cost of the clean-up and window replacement will be in the tens of thousands of pounds.

(c) There is further evidence that flares have been dropped through the windows into the Human Resources office and the archive area, causing burn damage to the tiled floor, a desk and computer equipment, and destroying a photocopier.

(d) The ManSafe cabling was cut.

(e) 15 holes were cut into the roof covering, which will now need to be replaced in sections or at least extensively patch repaired.

Docusign Envelope ID: 61EB72FE-75F5-4F81-88DE-A2DF48792418

(f) The front gates were buckled and severely damaged when they were rammed by the Perpetrators' vehicle. The internal automatic barrier inside the Logistics Entrance was crumpled and broken from its moorings.

(g) Damage to the metal plate ladder guard and padlock.

(h) Carpets and chairs within the building will need to be replaced after being showered with large quantities of broken glass from the broken windows and skylights.

63. Photographs of the above and further details are included in the Centrica Report and also in a "*Damage Report with Photos*" document prepared by a Moog employee who is involved in the management of the Wolverhampton Site, which I have exhibited at pp. 81 - 103.

64. As I have explained, it is too early for Moog to assess the full cost of repairing the damage caused, but I understand from speaking with my colleagues that the loss is estimated to be well over £1,000,000.

Business disruption

65. Fortunately, no employees of Moog or other personnel on site were injured during the Incident, even though six Moog employees and five security staff were present on site while the Incident occurred. Avoiding the risk of serious injury was by no means guaranteed. Aside from the substantial risk to employees and personnel on site caused by falling glass and flares, damage to Solar Panels risks possible electrocution and injury caused by the sharp edges of broken panels. It also increases the risk of fire.

66. It is estimated that it will take several weeks before the facility can become fully operational again. During this time, many employees will be forced to work from home as Moog works through the cleanup process and remediates all of the safety risks on the site. The interruption to Moog's business operations is severe. As with the assessment of damage and financial loss, it is too early for me to provide a full analysis of the extent of business disruption to Moog caused by the Incident. However, I am able to say that the disruption includes:

(a) The building was closed entirely for 2.5 days. There are now only operational employees on site and all office employees are still working from home.

(b) Issues with meeting supply contracts on time, including the supply of components for ultimate use by the MoD.

(c) Having to replace damaged equipment, desks, carpets etc.

Docusign Envelope ID: 61EB72FE-75F5-4F81-88DE-A2DF48792418

(d) Whilst 95% of the Solar Panels were damaged, the entire system is inoperable, meaning that Moog will be liable for the loss of energy generation and will need to procure electricity off the grid until the system comes back online.

(e) There is potential reputational damage for Moog if customers conclude that Moog's ability to supply components on time in accordance with the terms of supply contracts could be compromised by its susceptibility to disruption caused by unlawful protest activity.

67. Whilst it is not possible to be precise, I estimate that it will take several weeks for the Wolverhampton Site to be fully operational again after the Incident.

68. The total financial loss (property damage and business disruption) to Moog caused by the Incident is therefore likely to be between circa £1,250,000 to £2,000,000.

The Perpetrators

69. I understand from the media coverage of the Incident that the Perpetrators say they are from a group called "Palestinian Martyrs for Justice" (p. 104). The Perpetrators claimed that they carried out the Incident because Moog supplies military aircraft parts to Israel. The Police have informed Moog that they are working to establish a link between the Palestinian Martyrs for Justice and the pro-Palestinian protest group Palestine Action (**"PA"**), which has been proscribed by the UK Government under section 3 of the Terrorism Act 2000 since July 2025 (the **"Terrorism Act"**). I understand that one of the female Perpetrators has been observed attending PA rallies. There has also been a person that came to protest peacefully outside the gates of the Wolverhampton Site who was identified as a PA member. A link between the Incident and PA would not surprise me, as the violent activity during the Incident is similar to other tactics that I am aware were previously in use by PA. I explain the background to PA and its proscription in further detail below.

MOOG'S AWARENESS OF THE RISK

70. I understand from my solicitors that, as this application is without notice, Moog is under a duty of full and frank disclosure. With that in mind, I emphasise that whilst the Incident has significantly increased Moog's assessment of the risk level such that the Claimants now seek an injunction, Moog has been aware of the possible risk that it could be targeted by PA, or a group affiliated with PA, since early July, as I explain further below.

71. On 1 July 2025, a journalist from Declassified UK ("**Declassified**") called John McEvoy emailed the reception at the Wolverhampton Site indicating that Declassified was preparing an article about Moog's alleged supply of aircraft components to Israel since December 2024, "*based on shipping documents that we have obtained*" (p. 105). In the email, Mr

Docusign Envelope ID: 61EB72FE-75F5-4F81-88DE-A2DF48792418

McEvoy made various allegations, including that components had been delivered to Elbit Systems Limited (**"Elbit"**) at Elbit's Lavi Site in Hatzerim airbase in Israel, and invited Moog to reply by 17:00 the following day, 2 July 2025. By way of explanation, Elbit is an Israeli defence contractor and provider of equipment to the Israeli military, including unmanned aerial vehicles (known as UAVs or, more commonly, drones). In accordance with company policy, Moog did not provide any comment.

72. The Declassified article subsequently materialised on 10 July 2025, published on its website www.declassifieduk.org and entitled "Israeli Fighter Pilots Training with UK Equipment" (the **"Article"**) (see pp. 106 - 111).

73. The Article focused on the operations of the Wolverhampton Site and alleged, amongst other things:

(a) Moog has "*sent at least ten shipments to Israel's Hatzerim airbase since December…*" from the site, comprising equipment for M-346 Lavi high-performance aircraft (the **"M-346 Lavi"**), designed to train Israeli pilots to fly advanced fighter jets, including F-16 and F-35s, which *"have been used to commit war crimes in Gaza, including an airstrike on a designated safe zone which killed 90 people*";

(b) three of these shipments had occurred in the last month;

(c) Moog Wolverhampton "*designed the flight control system for the M-346 Lavi, and provides maintenance services for the* [M-346 Lavi]";

(d) "*In addition to supplying parts for the M-346 Lavi, Moog has contributed to the global F-35 programme";*

(e) Moog "*was on the most recent list of UK-based companies which have received arms export licences for the international F-35 programme*" which, pursuant to a recent High Court ruling, meant that it could legally export F-35 parts to Israel; and

(f) the UK Government "*doesn't care that Israel is committing genocide, and it doesn't care about Palestinian lives…"* and "*all* [it] *cares about is safeguarding arms dealers' profits, and it is down to us to hold them accountable for these horrific, immoral and illegal deals"*.

74. The Article, therefore, sought to draw a direct link between equipment manufactured by Moog at the Wolverhampton Site and the conduct of the war in Gaza by the Israeli military, by reason of:

(a) the alleged use of such equipment to train the Israeli military to fly fighter jets in Gaza; and

Docusign Envelope ID: 61EB72FE-75F5-4F81-88DE-A2DF48792418

(b) the use of such fighter jets by the Israeli military "*to commit war crimes*" in Gaza and against Palestinians.

75. It is not the purpose of this statement, nor would it be Moog's policy, to respond to any of the specific allegations made by Declassified in the Article but, for the record, I do not accept the characterisation of Moog's business activities in the Article and, in particular, the link it attempts to make with the situation in Gaza. I note that Declassified seeks to make this link despite the fact that they do not allege that any of the components in question manufactured by Moog have been used by the Israeli military in a combat situation or suggest that any of Moog's exports are not legal.

76. The Article did not say in terms that Moog was amongst those alleged 'arms dealers' in relation to which Declassified quoted Emily Apple of the Campaign Against Arms Trade ("**CAAT**") as saying "*it is down to us to hold accountable,*" but that is the clear implication given that the Article is about Moog and its alleged activities.

77. This was not the first time that Moog had been named in a publication in connection with the alleged supply of components to Israel. Moog was named in April 2024 in an open letter posted online alongside other companies, such as BAE Systems (**"BAE"**), as "*companies facilitating Israel's genocidal war on Gaza*" (see pp. 112-120). On 20 November 2024, CAAT produced an article titled "Mapped: the UK companies arming Israel, including producers for the F-35 combat aircraft", referencing Moog and including an interactive map of UK companies allegedly involved in arming Israel including by manufacturing components for F-35 combat aircraft (p. 121 - 124). The CAAT article listed the addresses of the Wolverhampton Site and the Tewkesbury (Commercial Aircraft) Site (p. 123), even though, as I have explained above, the Tewkesbury (Commercial Aircraft) Site manufactures products that serve the commercial aerospace market and does not produce any equipment for military use.

78. It is, therefore, apparent that campaign groups targeting manufacturers as alleged providers of equipment for use by the Israeli military do not necessarily distinguish between the different operations carried out at individual sites. As a result, I believe that all of Moog's UK sites are at potential risk of direct action from the Defendants, as I explain later in this statement.

79. As I say, CAAT is referenced in the Article, with their spokesperson, Ms Apple, asserting the export of supplies for Israeli fighter jets "*makes a mockery of the government's already outrageous argument that the only reason it is continuing to supply F-35 spare parts is due to the threat of national security*" (pp. 107 – 108). I am not aware of Moog having been named on PA's website, which is no longer accessible following PA's proscription under the Terrorism Act (please see below). I have seen a copy of the relevant page from the PA

Docusign Envelope ID: 61EB72FE-75F5-4F81-88DE-A2DF48792418

website which listed its "target" companies on 9 July 2025, and as such pre-dates the Article, which does not name Moog. I do not know whether Moog subsequently appeared on the PA website after the Article was published but prior to the website being removed.

THE DEFENDANTS

80. Since 5 July 2025, PA has been a proscribed terrorist organisation under section 3 of the Terrorism Act 2000 ("**Terrorism Act**"), as explained below.

81. The aim of the PA, according to one of its founders, Huda Ammori, is:

> "*(i) to prevent serious violation of international law by Israel… against the Palestinian people, including war crimes, crimes against humanity, apartheid and genocide, and the aiding, abetting and facilitation thereof by others, including corporate actors; and*
>
> *(ii) to expose and target property and premises connected to such crimes and violations,*"

– see the judgment in *The King (on the application of Huda Ammori v Secretary of Statement for the Home Department* [2025] EWHC 1708 (Admin) (the "**Judgment**") at pp. 125 - 150.

82. At pp. 151 - 164 is a copy of PA's "Underground Manual", which was available on PA's website (which has since been taken down). This sets out PA's guidance for those wishing to take part in its protest activities, including:

(a) "*Create a Cell*", following which PA will respond with "*potential future targets*".

(b) "*Pick a Target*", encouraging activities to select a name from PA's website of a target lists of "those who enable and profit from the Israeli weapons industry in Britain".

(c) "*Prepare for Action*", which includes advice on carrying out effective reconnaissance at target sites without getting noticed and suggests some "*key information to find out*", including:

i. the presence of security;

ii. CCTV;

iii. how far away the local police force is;

iv. the requisite height of a ladder to climb over fences;

v. whether there is barbed wire;

Docusign Envelope ID: 61EB72FE-75F5-4F81-88DE-A2DF48792418

vi. the location of the access points; and

vii. intruder alarms.

(d) "*Plan your Action*", recommending activists wear dark clothing and a face covering to avoid detection and to bring spray paint, a sledgehammer for smashing windows and exterior equipment (including air conditioning units and cameras to "*sabotage the profits of your target even further"*), blocking pipes (water and/or sewage) and breaking in and "*damaging the contents inside*".

(e) "*Technology*", advising activists to use a 'burner phone' and how to set one up.

83. PA has a history of unlawful protest activity against businesses which it alleges supply military materials to Israel, as well as UK government facilities including military bases such as RAF Brize Norton. This includes other examples of trespass of premises, damage to property and vandalism, and members having been charged for offences involving violence and weapons (including pyrotechnics and smoke bombs).

84. For example, members of PA have continuously targeted Elbit in the UK and its subsidiary UAV Tactical Systems Limited (**"UAV"**), including by unlawfully occupying Elbit's factory for six days, smashing windows, causing vandalism and chaining themselves to the gates. See also the BBC news item dated 17 July 2025 at pp. 165 - 167, which refers to members of PA 'ram-raiding' Elbit's site near Bristol on 6 August 2024, causing extensive damage to inventory and "*assaulting employees and two police officers*".

85. At https://www.youtube.com/watch?v=GAhpMqJIVeA is a link to a documentary produced by PA in 2025 entitled "To Kill a War Machine". This features footage of PA activists engaging in various unlawful protest activities, including climbing (and in some cases gluing themselves) onto the roofs of various factories in the UK, breaking and entering, criminal damage, assaulting security guards and locking themselves onto perimeter gates and fences. The commentary suggests that companies allegedly involved in the supply of components for F-35 fighter jets in particular were being targeted, and in some cases third parties like banks. It is claimed in the documentary that the occupation of sites by protestors lasted several days with the specific aim of shutting down factories for as long as possible. In relation to one protest, it is claimed that more than £1 million of damage was caused.

TELEDYNE UK LIMITED INJUNCTION

86. I understand that other companies have sought injunctive relief after they were targeted by PA. For example, I am aware that in December 2024, Teledyne UK Limited (**"Teledyne"**) applied for an injunction to protect six of its sites after it was subject to unlawful acts of protest by individuals associated with PA. Teledyne specialises in manufacturing

Docusign Envelope ID: 61EB72FE-75F5-4F81-88DE-A2DF48792418

components and subsystems for medical, science, aerospace, defence and industrial applications.

87. Teledyne applied for an injunction after the addresses of its six UK sites were published on PA's website and listed as 'targets' for direct action protest. Teledyne was subject to a series of incidents of direct action throughout 2022 and 2023, which increased in 2024, some of which were similar to the Incident at the Wolverhampton Site. According to court documents filed by Teledyne, which can be accessed on https://www.teledyne-injunction.co.uk/, examples of such incidents included:

(a) **9 December 2022** – Four individuals broke into a Teledyne building wearing balaclavas armed with crowbars and sledgehammers. They gained access to the premises and the roof, smashed glass doors and windows, damaged IT equipment and sprayed the building inside and out with red paint. The attack lasted five to six hours. The estimated cost of the damage was £1.2m and US$1m in lost sales.

(b) **2 April 2024** – 20 protestors attended at 05.30 and climbed onto the roof of Teledyne's Shipley site, causing £571,000 of damage. They brought with them a sledgehammer, ladder and fire extinguisher. The incident lasted 16 hours. Business was interrupted for five days, causing £300,000 of losses.

(c) **15 May 2024** – At 04.30, four individuals accessed the roof of the Shipley site, causing damage: smashing windows, spraying paint and setting off fireworks inside the building. The incident lasted seven hours, resulting in £68,000 of repairs and £60,000 of lost revenue.

(d) **5 July 2024** – At 04.45, three individuals rammed the access gates of the Teledyne Wirrall site with a van, and attempted to gain access to the roof. The incident lasted four hours.

(e) **2 October 2024** – At 05.55, three individuals accessed the roof of the Teledyne Wirrall site, causing damage to the roof and the building, including with the use of paint. They accessed a 'clean room' and later said in social media posts that contamination of this room "*could stop production for up to 12 months, and disrupt production for 18 months.*" Repairs cost £148,000 plus £335,000 for the roof, with lost revenue of £14,000.

(f) **19 December 2024** – 8 to 12 protestors gathered outside Teledyne's Shipley site holding posters and Palestinian flags. A lone male then parked his car outside the gate, unfurled a flag and began shouting abuse and pro-Palestinian slogans at Teledyne staff. He proceeded to lock himself to the steering wheel of his car. When

Docusign Envelope ID: 61EB72FE-75F5-4F81-88DE-A2DF48792418

he was finally arrested and searched, police found an overnight bag, sledgehammer and two zombie knives.

88. The repeated pattern of such damaging, disruptive, and unlawful activity against the Teledyne sites is clear. I am therefore extremely concerned that the Incident was not an isolated occurrence and the Wolverhampton Site and Moog's other Sites will continue to be targeted.

89. Teledyne was granted an interim injunction on 20 December 2024. I understand from the witness statements filed in support of the 24 January 2025 return date hearing that the grant of the injunction had a deterrent effect on PA's activity. Whilst subsequent protest activity took place at Teledyne's sites over the following five months, all but two had been peaceful. The impact of even the two more violent protests, which took place on 28 January 2025 and 18 February 2025, appears to have been substantially curtailed. Police arrested three protestors quickly after the 28 January 2025 incident for breaching the terms of the injunction. On 18 February 2025, the activity was limited to protestors throwing bottles of paint over the fence.

PROSCRIPTION UNDER THE TERRORISM ACT

90. On 20 June 2025, PA targeted the Royal Air Force ("**RAF**") base RAF Brize Norton, where it vandalised and damaged two RAF refuelling planes. Following this (and the other criminal actions perpetrated by PA), the Home Secretary put an order for proscription before Parliament. In her written ministerial statement to the House of Commons, the Home Secretary stated that the attack on RAF Brize Norton was "*the latest in a long history of unacceptable criminal damage committed by Palestinian Action. The UK's defence enterprise is vital to the nation's national security and this Government will not tolerate those who put that security at risk*" (see p. 168 – 170 and the Judgment referred to above).

91. The Home Secretary went on to further state that PA's "*activity has increased in frequency and severity since the start of 2024 and its methods have become more aggressive, with its members demonstrating a willingness to use violence*" and that in "*several attacks, Palestine Action has committed acts of serious damage to property… The seriousness of these attacks includes the extent and nature of damage caused, including to targets affecting UK national security, and the impact on innocent members of the public fleeing for safety and subject to violence.*" The Home Secretary also noted that the extent of the damage caused by PA since 2020 had "*resulted in hundreds of millions of pounds worth of criminal damage and lost revenue*".

92. On 2 July 2025, the House of Commons voted to proscribe PA as a terrorist organisation, and on 5 July 2025 PA was officially proscribed PA as a terrorist organisation under the

Docusign Envelope ID: 61EB72FE-75F5-4F81-88DE-A2DF48792418

Terrorism Act. This had the effect of making it a criminal offence for anyone to be a member of, or show support for, PA. As set out in the Judgment, Ms Ammori applied for interim relief to prevent the proscription from taking effect pending an application for judicial review but this was refused by the High Court on 4 July 2025. At a hearing of 21 July 2025, PA sought permission for a judicial review of the UK Government's decision to proscribe PA as a terrorist organisation and permission was granted on 30 July 2025.

PREVIOUS PROTEST ACTIVITY

93. Prior to its proscription, there was a clear pattern of UK-based companies being targeted by protests from PA and other pro-Palestinian organisations, particularly after being named in Declassified. For example:

(a) On 20 November 2023, a Declassified article was published alleging that BAE manufactured key parts of the F-35 fighter jets being used to support strikes on Gaza and had consequently seen its share price increase (pp. 171 – 177). Shortly afterwards, on 7 December 2023, hundreds of protestors from Workers for a Free Palestine gathered outside BAE's factories across the UK, blockading sites in Bournemouth, Glasgow, Brighton and Lancashire (pp. 178 - 179).

(b) On 12 February 2024, Declassified claimed that the MoD was hosting Israeli armed forces personnel and providing 'defence-led training courses' (pp. 180 - 183). On 10 April 2024, PA (who had staged a protest outside Sir Keir Starmer's home the day before) and another group called Youth Demand sprayed red paint on the walls of the MoD in central London (pp. 184-186). A number of protestors were arrested on suspicion of criminal damage.

(c) On 15 October 2024, Declassified ran an article about UAV, which was alleged to make "*85% of Israel's drone fleet terrorising Gaza*". The Declassified article claimed that UAV "*was making millions of pounds on profit with an £11m turnover*" but "*That was until we showed up. Palestine Action has stated over 20 protests at the firm's factory in Shenstone, blockading the gates, occupying the roof and smashing up equipment*" (pp. 187-193). This appeared to make a direct connection between Declassified and PA. UAV was subject to further protest activity shortly after publication of the article, including activists blockading the gates of UAV's factory on 25 November 2024 (pp. 194–195), and smashing the walls of the factory on 25 December 2024.

(d) On 14 December 2023, Declassified ran a story about Martin-Baker Limited ("**Martin-Baker**"), a "*family owned business that's been running for almost a century*" that manufactures ejection seats. The article claimed that Martin-Baker

Docusign Envelope ID: 61EB72FE-75F5-4F81-88DE-A2DF48792418

"*supplies seats to Israel's air force, which is pummelling Gaza with genocidal intensity*" (pp. 196–201). As was subsequently reported in the Bucks Free Press (pp. 202–203), in a report which referred to the Declassified article, pro-Palestinian protestors gathered outside Martin-Baker's factory in Buckinghamshire holding signs reading 'Death merchants out of Denham' and other slogans.

(e) A more serious incident occurred after a further Declassified article was published on 13 November 2024, which again claimed that Martin-Baker was shipping parts to the Israeli air force (pp. 204–210). The evidence for this was said to be 'cargo documents' obtained by Declassified, which is similar to its alleged source of information regarding Moog in the Article. Martin-Baker was subsequently targeted by PA on 29 January 2025 (pp. 211–212) when protestors wearing dark clothing and face coverings broke into the Martin-Baker headquarters and used a hammer, crowbar and spray paint to damage the building.

(f) On 8 May 2025, Declassified reported on "*activists from Palestine Action*" storming the factory of Instro Precision ("**Instro**"), which was alleged to be a subsidiary of Elbit Systems that had been "*shipping targeting equipment to Israel amid the Gaza genocide*", including military tripods, tripod support systems, radar kits and aerial reflectors (pp. 213 – 218). The evidence for this was said to be 'cargo documents', which is similar to Declassified's claim that its evidence concerned Moog was based on shipping documents. According to the article, PA had caused over £1 million worth of damage to Instro's premises (p. 214). Following publication of the article, there was a further by PA attack aimed at Instro on 29 May 2025. In this instance, PA targeted the registered London address of Discovery Park Ltd, the landlord of Instro's Kent factory, smashing windows and covering the premises in red paint (pp. 219–220).

(g) On 9 June 2025, Declassified reported on Permoid Industries ("**Permoid**"), a Durham-based company, alleging that it had sent 16 shipments of storage containers to Elbit Systems in Israel that could be used for carrying weapons (pp. 221–226). Despite this seemingly tenuous connection, protest action by PA followed on 16 June 2025, with a group of people accessing the roof of Permoid's two-storey factory (pp. 227–228). According to a police spokesperson, the incident led to significant disruption to the public and criminal damage to the building.

PROTEST ACTIVITY SINCE PA'S PROSCRIPTION

94. I am aware that there have been further incidences of violence and damage to property by potential affiliates of PA since PA was proscribed, although I understand these activities decreased following the date of proscription, as I explain below. On 15 July 2025, three

Docusign Envelope ID: 61EB72FE-75F5-4F81-88DE-A2DF48792418

women were arrested under the Terrorism Act after driving a van into the fence of a factory owned by Leonardo, which is alleged to make components for Israel's F-35 fighter jets, in Edinburgh. The individuals claimed to be members of a pro-Palestinian group called 'Shut Down Leonardo'. It is not clear what, if any, connection they might have with PA. The three women have since been charged (see BBC news story from 20 July 2025 at pp. 229 – 230).

95. On 24 July 2025, three individuals forced entry into The Spark, a building located in Newcastle Helix, a business campus in Newcastle, UK. The Spark is occupied by several commercial tenants, including Womble Bond Dickinson (UK) (**"WBD"**), the law firm appointed to act for Leonardo. The offenders forced entry into the building by smashing the windows. They sprayed red paint throughout the building, including painting "*Leonardo Off Campus"* on the windows of the building (pp. 231–232). As Leonardo occupies an office in the same business park as WBD, I do not know whether the intended target was Leonardo, WBD, or any other commercial tenants occupying premises in The Spark.

96. PA's determination to continue its activities was also confirmed in a press statement released by the group following designation as a terrorist organisation (pp. 233-234). In the statement, PA refer specifically to their claim to have "*forced shut three Israeli weapons factories*" and "*pressured over a dozen companies to cut ties with Elbit Systems*" and encourage their supporters to continue "*resisting the ban through a campaign of civil disobedience*" without using the PA name. They state that "*we are an idea that can never be stopped*" and "*they can not* [sic] *proscribe the TACTIC of direct action for Palestine*" and also refer to other groups that will carry on the campaign under different names, including 'Defend Our Juries' and 'we do not comply'.

DISCUSSIONS WITH POLICE

97. Since publication of the Article, Moog has communicated regularly with the Police in relation to the risk level at the Wolverhampton Site and its other Sites. I understand that an employee at the Wolverhampton Site initially contacted the Police via the 101 service on 1 July 2025 to raise concerns about the possible threat from PA.

98. On 4 July 2025, a police officer from South Staffordshire Local Policing Team visited the site, reviewed the email sent from Mr McEvoy at Declassified, discussed safety at the Wolverhampton Site in the event of a protest and reviewed the external site and existing safety measures.

99. On 7 July 2025, the Police attended the Wolverhampton Site again, reviewed the site risks, and advised on potential protest control measures. Moog contacted the Police again on 10 July 2025 to advise them that the Article had been published online. On 10 and 11 July 2025, Moog had further discussions with the Police on risks and existing and further control

Docusign Envelope ID: 61EB72FE-75F5-4F81-88DE-A2DF48792418

measures. The Police attended again on 22 July 2025. Uniformed police officers have regularly patrolled the Wolverhampton Site since the Article was published.

100. I understand that the Police informed Moog's solicitors in late-July 2025 that activity from PA targeting the sites of UK-based manufacturers has been significantly quieter since it was proscribed under the Terrorism Act (although such activity has not ceased completely, as I explain above).

101. Following the Incident, it has become clear that the risk to Moog and its employees is severe. Whilst the Perpetrators are now remanded in custody, I am extremely concerned that the Incident will lead to 'copycat' attacks at the Wolverhampton Site and the other Sites, again risking substantial property damage and the health and safety of both employees and perpetrators. This is similar to the pattern of behaviour that has happened in relation to Teledyne and other companies such as Elbit.

102. Following the Incident, the Police verbally recommended to a Moog employee involved in the management of the Wolverhampton Site that Moog obtain an injunction to prevent further protest action; this was based on their awareness that other facilities that had been targeted by pro-Palestinian protestors had been attacked several times. I am aware of incidents where protestors have blocked the entrance of facilities. For example, in July 2025, protestors were arrested after blocking the entrance to Elbit (pp. 235-237). PA has also blocked the entrance to UAV Engine's facility (pp. 238-239).

103. To reiterate, my concern is not limited to the Wolverhampton Site alone. As I explained above, I understand that the Defendants, and campaign groups affiliated with their cause, do not distinguish between different operations carried out at different sites and, as the Teledyne proceedings demonstrate, target companies across all of their UK sites, rather than just individual premises. Attacks on Instro's landlord, Teledyne's lawyers (as detailed in court documents filed in those proceedings) and possibly also Leonardo's lawyers suggest that PA and other groups cast their net widely when selecting targets for protest action. Therefore, I am concerned that all the Sites are at serious risk of direct action. This concern appeared to be substantiated when graffiti stating "Free Palestine" recently appeared on a bollard on the public highway outside the Tewkesbury (Commercial Aircraft) Site; see the picture taken on 17 August 2025 exhibited at p. 240.

COMMERCIAL RISKS

104. It is also commercially important that Moog takes action now to protect the Sites. Operational disruption caused by further protest activity at the Sites will cause even greater financial loss than that already caused by the Incident.

Docusign Envelope ID: 61EB72FE-75F5-4F81-88DE-A2DF48792418

105. For example, Moog is a party to numerous contracts which have liquidated damages clauses that are triggered on the late shipment of equipment to its customers. These can be substantial. At the Wolverhampton Site, these can range from 1 to 10% of the value of the equipment to be supplied.

106. At the Tewkesbury (Commercial Aircraft) Site, any delay in the delivery of equipment will have repercussions on Moog's customers' ability to manufacture aircraft. This can result in grounded aircraft or other substantial delays.

107. The Tewkesbury (Industrial) Site's operations are subject to standard purchase orders from customers. The risks of not complying with a purchase order include:

(a) an inability for Moog to fulfil its orders for Formula 1, resulting in the cars being unfinished and unable to race;

(b) actuators for Power Generation being unreturned within a scheduled power outage, delaying the resumption of power at the relevant power station and causing power outages at the relevant power station location; and

(c) disruption to numerous industrial customers who will be unable to fulfil third-party contracts.

108. Although it is difficult to be exact, I would estimate that the lost profits suffered by Moog, should all of the Sites be shut down as a result of protest activity, would be in the order of up to about £50,000 per day and up to about £10,000 per day for any individual Site.

109. Furthermore, as noted earlier, Moog's products are used across a number of military and commercial aircraft customers. Moog is a key supplier of components ultimately used by the MoD, supporting the UK's service personnel and keeping them safe.

MITIGATION

110. The Wolverhampton Site has constant security arrangements in place. This normally includes security on logistics during the day, and security during out of hours. From 4 July 2025, shortly before the Article was published, additional security has been engaged to monitor CCTV systems and monitor the external areas within the perimeter and the external perimeter of the Wolverhampton Site. It had been hoped that these additional security measures would be sufficient to prevent any unlawful protest action but, since that has not proved to be the case, Moog feels that it must now apply for an injunction to help deter such activity, and it is further stepping up security at the Sites.

111. Since the Incident, Moog has engaged an outside security firm to provide 24-hour perimeter security (7 days a week) at the Wolverhampton Site. This includes a team of security

Docusign Envelope ID: 61EB72FE-75F5-4F81-88DE-A2DF48792418

personnel and the use of canines for deterrence. This level of increased security is extremely costly for Moog's business and will not be able to be incurred for an indefinite period of time.

112. Further security measures put in place at the other Sites include 24 hour security personnel onsite at the Tewkesbury (Industrial) Site, the Tewkesbury (Commercial Aircraft) Site, the Reading Site and the Luton Site. At the Reading Site there is also a dog handler, and at the Luton Site Moog has installed CCTV monitoring.

INJUNCTION

113. For the reasons set out in this statement, I respectfully ask the Court to grant an Order in the form attached hereto which prevents the Defendants from accessing the Sites.

114. The various activities described above show that the protestors in question are quite prepared to break the law and disregard the health and safety consequences of their actions and that, in the absence of police intervention, the only way to prevent unlawful activity and damage to the Sites can be for the owner of the Sites to pursue civil remedies.

115. The Order sought in these proceedings sets out the activity that Moog is seeking to restrain, being activity that Moog has been advised by the Police is at risk of being deployed by protestors in organisations affiliated with PA, and was:

(a) carried out by the Perpetrators during the Incident;

(b) carried out by PA and other affiliated organisations during similar incidents of unlawful protest at the sites of companies alleged to be supplying military equipment to Israel (including Teledyne); and/or

(c) described in the PA Underground Manual, which I have exhibited to this statement, as examples "*different tactics"* for protestors to use, to which I refer in more detail above.

116. In terms of the Defendants to these proceedings, they are not defined by reference to PA, but more broadly by reference to persons unknown undertaking certain actions in connection with protest. This is, in part, because PA and its affiliates do not appear to be the sort of organisation where those who are members and those who are not (but support PA's causes and participate in its activities) are clearly defined (indeed, the Perpetrators claim to belong to a different group, albeit sympathetic to the same cause); and, in part, because protestors may deliberately conceal their affiliation with PA, not least since it is now been designated a terror organisation (resulting in potential arrest for anyone publicly supporting PA).

Docusign Envelope ID: 61EB72FE-75F5-4F81-88DE-A2DF48792418

117. Moog is aware of the names of the four Perpetrators who have been charged in connection with the Incident (p. 77). As the Perpetrators have been remanded in custody until 26 September 2025, we have decided not to name the Perpetrators as Defendants in this application, because the Perpetrators are unlikely, at least in the short term, to undertake the activities for which Moog seeks its injunction. The risk that the Perpetrators may pose thereafter may well be affected by the outcome of the criminal proceedings against them.

118. Whilst Moog is continuing to seek information in the intervening period as to the addresses for service of each of the Perpetrators, and may wish to join the Perpetrators as Defendants at a later stage, given the urgency of these proceedings, and the risk that any delay poses to the safety of the Sites and the employees working at the Sites, we do not wish to delay taking action to protect the Sites against other individuals who may take direct action while the Perpetrators are on remand.

URGENT NATURE OF APPLICATION

119. The Claimant seeks a without notice injunction. This is because, for the reasons stated above, the Claimant believes that the Defendants' activities have the potential to pose a real danger to life, limb or property. They are also causing a real risk of substantial financial damage. There is also a real and genuine concern that by giving the Defendants notice of Moog's application, this will tip them off and incite a further attack before an injunction can be granted. I further ask that the time limits for service be abridged or dispensed with, as the Court considers necessary, in view of the urgency of this matter.

120. I understand that Moog is required to serve any order for an injunction by measures which are reasonably expected to bring the order to the Defendants' attention. For this reason, Moog has set up a website address at: https://www.moog.co.uk/injunction, which is ready to be updated and populated with the text and documents required for digital service (the **"Service Website"**). The Service Website address contains links set up for the materials to be downloaded. I understand from speaking with Moog's UK IT team that the team can update the Service Website with the relevant documents within the space of a few hours after any court order is made, and publish these to the public immediately.

121. Separately, if its application is granted, Moog will arrange for signs to be prepared and displayed in prominent locations at the entrance point to the Sites, which will inform members of the public accessing the Sites of the terms of the injunction. This will include all entrances (pedestrian and vehicular) and the roof access points. As previously, I have not provided detail of the layout of each Site due to the security concerns involved.

122. Moog has endeavoured to submit this application as soon as it was able to following the Incident. However, it also wished to ensure that it had all the correct facts, details and risks

Docusign Envelope ID: 61EB72FE-75F5-4F81-88DE-A2DF48792418

from the Sites before it asked the Court to consider this application, which has included seeking appropriate legal advice and discussions with the Police, various employees, and senior management. Insofar as further relevant information comes to light following the issuing of this application, Moog will, of course, update the Court by way of further witness evidence if necessary.

CROSS-UNDERTAKING IN DAMAGES

123. If this application is granted and it is subsequently determined by the Court that Moog was not entitled to the relief granted by the Court, I confirm that Moog is willing to undertake to the Court to compensate the Defendants for any loss suffered as a result of any relief granted.

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: Elwira Kelly 92C7F87347624E7… ……

Elwira Kelly

DATED this 4 day of September 2025.

Docusign Envelope ID: 2572B2A1-1464-4693-9547-D74B64EAF3DB

Elwira Kelly
Claimant
Second Statement
5 September 2025
Exhibit "EK2"

IN THE HIGH COURT OF JUSTICE **CLAIM NO.**

CHANCERY 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 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

Docusign Envelope ID: 2572B2A1-1464-4693-9547-D74B64EAF3DB

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 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 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

SECOND 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 a witness statement in these proceedings dated 4 September 2025 (**"Kelly 1"**). For the avoidance of doubt, capitalised terms in this statement adopt the definitions in Kelly 1.

THE LUTON SITE

2. At paragraph 53 of Kelly 1, I stated: "*Access to the building entrance on the Luton Site is gained through the car park, shown hatched blue to the south of the two units on Plan 2 (p. 3), which is also used by Moog but not demised to Moog*."

3. Since preparing Kelly 1, I have been informed by an employee at the Luton Site that Moog also uses:

   (a) a loading bay to the north of Unit J;

Docusign Envelope ID: 2572B2A1-1464-4693-9547-D74B64EAF3DB

(b) car parking spaces to the west of Unit J;

(c) a loading bay to the east of Unit C; and

(d) car parking spaces to the east of Unit C, these being in a larger car parking and circulation area which are also often used by the occupiers of the adjacent unit.

4. Moog therefore wishes to extend the geographical area of the injunction sought at the Luton Site to include those areas (the **"Additional Area"**).

5. With regards to Unit J, the Additional Area comprises the parking areas which are used in practice by Moog, being:

(a) some (but not all) of the car parking spaces specifically identified on the lease plan for Unit J as being spaces in which it has a right to park (pp.1-10);

(b) some additional parking spaces to the west of Unit J which are not identified on the lease plan for Unit J but which Moog has, in practice, had exclusive use of; and

(c) a loading area to the north of Unit J that Moog has, in practice, had exclusive use of.

6. With regards to Unit C, the Additional Area comprises:

(a) the car parking areas to the east of Unit C specifically identified on the lease plan for Unit C as being spaces in which it has a right to park (pp.11-20); and

(b) a loading area on that side of the Unit that Moog has, in practice, had exclusive use of.

7. For completeness, I also exhibit to this statement a plan showing the entirety of the geographical area (including the Additional Area), over which Moog seeks an injunction at the Luton Site, edged in yellow (p.21).

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: Elwira Kelly 92C7F87347624E7...……

Elwira Kelly

DATED this 5 day of September 2025.

Docusign Envelope ID: 2572B2A1-1464-4693-9547-D74B64EAF3DB

Docusign Envelope ID: A240AF6C-0EDA-4E2C-AC42-640D889C353D

Elwira Kelly
Claimant
Third Statement
1 October 2025
Exhibit "EK3”

Docusign Envelope ID: A240AF6C-0EDA-4E2C-AC42-640D889C353D

IN THE HIGH COURT OF JUSTICE **CLAIM NO. PT-2025-000910**

CHANCERY 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 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

Docusign Envelope ID: A240AF6C-0EDA-4E2C-AC42-640D889C353D

(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 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 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

THIRD 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 two witness statements in these proceedings, the first dated 4 September 2025 (**"Kelly 1"**) and the second dated 5 September 2025 (**"Kelly 2"**). For the avoidance of doubt, capitalised terms in this statement continue to adopt the definitions in Kelly 1.

2. I make this witness statement following the hearing before the Honourable Mr Justice Meade on 5 September 2025, at which, following Moog's application of 4 September 2025 (the **"Application"**), Moog was awarded an interim injunction (the **"Interim Injunction"**) over the Sites on the terms set out in the order of Mr Justice Meade dated 5 September 2025 (pp. 2-27) (the **"Order"**). The Order provided that the Application would be listed for a return date on 6 October 2025 (the **"Return Date Hearing"**), having been made *ex parte* without notice to the Defendants.

3. In advance of the Return Date Hearing, I wish to update the court on relevant matters that have occurred since the Order was made. As before, I avoid in this statement mentioning my colleagues at Moog and others by name in the interests of protecting their personal

Docusign Envelope ID: A240AF6C-0EDA-4E2C-AC42-640D889C353D

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

NOTIFICATION

4. Pursuant to paragraphs 10 and 11 of the Order:

(a) The Application documents and the Order were uploaded to www.moog.co.uk/injunction on 5 September 2025 (the **"Website"**). I exhibit at (p.28) a screenshot of the documents listed on the Website.

(b) On or shortly after 5 September 2025, the Order and the warning notices set out in the Order (together, the **"Notices"**) were displayed at prominent locations at the Sites, as set out in the table below. I have seen photographs of the relevant Notices, and I also exhibit maps showing the location of each of the Notices at the Sites (pp. 29-33). As some of the Notices are attached to parts of the Sites that are potentially vulnerable to direct action from protestors, I have not exhibited the photographs to this statement due to the security risk.

Site	Location	Date and/or Time the Notices were displayed
Wolverhampton Site (p. 29).	Either side of all access gates to and from the Wolverhampton Site, including along Innovation Drive and Valiant Way. On employee access gates to the main building. On access gates leading to roof and car park.	5 September 2025 22:22
	Additional Notice displayed to the fence line at rear of building.	26 September 2025
Luton Site (p. 30).	South-west side of Unit C, adjacent to car parking area. Along the south-east side of Unit C, close to the loading bay. Two Notices appended next to the walkway between Unit C and Unit J.	5 September 2025 22:32

Docusign Envelope ID: A240AF6C-0EDA-4E2C-AC42-640D889C353D

	On the North-East side of Unit J.	
Tewkesbury (Aircraft) Site (p. 31).	Along the east of the building: • Reception • Canteen • Near the sheds and turning circle area, at the extension door and both sides of the dispatch area Along the south of the building adjacent to the staff parking area: • South Canteen • South Canteen Corridor • Gym Entrance Along the west side of the building: • West office exit • Roof stairs • Either side of Pump Room West • Compressed air room • Extension West Room Along the north side of the building: • At both Extension Fire Doors	5 September 2025 22:46
Tewkesbury (Industrial) Site (p. 32).	At the dispatch door and goods door in yard to the north of the site. At the side door along the west side of the site adjacent to Northway Lane.	5 September 2025 22:46

Docusign Envelope ID: A240AF6C-0EDA-4E2C-AC42-640D889C353D

	At the south side of the site by the car parking area and entrance, at the front doors. Along the east side of the side adjacent to the access road, at the side fire door and canteen window.	
Reading Site (p. 33).	At all access doors around the site, including the locker room and stores entrances.	6 September 2025 09:09

(c) Since there is no perimeter fencing in place at the Luton Site and the Reading Site, the Notices have been appended to the buildings on those sites. As a result, any potential protestors would technically need to be trespassing onto those sites in order to read some of the Notices clearly. At the Reading Site, the Notices are approximately 10-25 metres away from the site boundary. At the Luton Site, the Notices are approximately 6 metres away from the site boundary, save for the Notices displayed on Unit J and the south-west side of Unit C, at which point they are approximately 18-20 metres from the site boundary.

(d) At the Luton Site, my colleagues have arranged for PIR motion sensor lights to be installed around the site so that the perimeter lights up should any potential protestors approach in the dark.

(e) In order to ensure that we have done as much as possible to bring the Notices to the attention of any potential protestors, Moog is also arranging for:

(i) The Notices to be displayed on boards at three locations around the perimeter of the Reading Site (circled black on the plan at p. 33); and

(ii) The Notices to be displayed on the brick wall located between the two entrances to the Luton Site and car parks used by the Luton Site (shown circled blue on the map at p. 30).

(f) As the Sites did not have immediate access to A2 printers (the Order having been granted late in the afternoon of 5 September 2025), the warning notices were initially affixed in A3 size and replaced with A2 size on 8 September 2025 (all in accordance with paragraph 11(iii) of the Order).

5. On 11 September 2025, my colleagues arranged for the Notices at the Wolverhampton Site to be illuminated with electric lighting so they could more easily be seen at night.

6. Moog also made a further application on 15 September 2025 for the Return Date Hearing (pp. 34-40). In accordance with paragraph 12 of the Order, this further application was

Docusign Envelope ID: A240AF6C-0EDA-4E2C-AC42-640D889C353D

uploaded to the Website on 16 September 2025, and placed at the same prominent locations at the Sites as the Notices (set out in the above table) on 16 September 2025.

7. I understand from my colleagues at Moog responsible for dealing with such matters that, as at 30 September 2025, there have been 127 hits on the Website. It is not possible for Moog to trace the location of the relevant servers.

8. Notwithstanding the steps we have taken to notify Defendants of the Application documents, the Order and the Return Date Hearing, as at the time of making this statement, Moog has not received any evidence in response to the Application pursuant to paragraph 8 of the Order, either to the email or postal address set out in paragraph 20 of the Order.

CRIMINAL PROCEEDINGS

9. As I explained in Kelly 1, the Perpetrators of the Incident were remanded in custody after being charged with conspiracy to commit criminal damage and criminal damage (the **"Offences"**).

10. The Police have informed me that, having reviewed the evidence against the Perpetrators, the Crown Prosecution Service (CPS) intends to link the Offences to terrorism, to which the court must have regard as an 'aggravating factor' under s.69(2) Sentencing Act 2020. As a result of the severity of the Offences, the Police have also informed me that the criminal proceedings have been transferred to the Old Bailey in London. The bail hearing for the Perpetrators is scheduled to take place on 3 October 2025. I am reassured that the criminal proceedings are progressing and the Police and CPS are treating the proceedings extremely seriously. However, I am concerned that the transfer of the case to the Old Bailey may attract further publicity, in addition to the recent press attention that Moog has received (which I explain further below), and so the Sites remain at risk of further unlawful protest activity.

11. Following discussions with Moog's solicitors, who were made aware by the Police, I also wish to inform the court that I am aware of the names and ages of the Perpetrators. However, since that information is not yet in the public domain, I have not named the Perpetrators in this statement.

FURTHER ACTIVITY

12. In the interests of full and frank disclosure, I confirm that Moog has not encountered further protest activity like the Incident since the Interim Injunction was granted.

13. However, Moog has experienced some vandalism by potential Pro-Palestinian protestors. There has also been some activity that, following discussions between my colleagues at the relevant sites and the Police, I have reason to believe indicates that direct action on or

Docusign Envelope ID: A240AF6C-0EDA-4E2C-AC42-640D889C353D

close to the Sites continues to be a real threat. Moog continues to engage with the Police about these. The further activity is as follows:

(a) On 9 September 2025, security staff at the Wolverhampton Site observed two individuals walking around the perimeter of the site past the main entrance towards the building occupied by Jaguar Land Rover (close to the main building on the Wolverhampton Site) at approximately 3am. The individuals concerned were a male and a female pushing a pram. They walked along Innovation Drive, past the perimeter of the Wolverhampton Site, for approximately five minutes. Security staff at the Wolverhampton Site observed that the pram was empty. This is concerning because the Police previously informed my colleagues that PA, and other affiliated groups, have advised their members to use 'props' such as prams, pushchairs, or animals when patrolling sites that they intend to target as a means of avoiding detection. This is consistent with PA's "Underground Manual", exhibited to Kelly 1, which states "*if you're going out in the sticks walking around an industrial estate with a selfie stick - you'll probably stand out a bit. On going for sites in more rural areas, try asking to borrow someone's dog to take them on a walk (or walk your own dog if you've got one)*". The Police attended the Wolverhampton Site at approximately 4am to investigate.

(b) On 15 September 2025, my colleagues at the Tewkesbury (Aircraft) Site identified the words "*Moog kill Palestinians*" written on the entrance walkway opposite the Tewkesbury (Aircraft) Site (p. 41).

(c) On multiple occasions, including on 1, 7, 12, 13, 20 and 25 September 2025, security staff at the Wolverhampton Site have seen drones fly over the site. The drones hovered over the Wolverhampton Site for several minutes each time.

(d) On 25 September 2025, at approximately 3am, staff at the Wolverhampton Site observed a car approach and park directly in front of the entrance to the site. The Police were onsite at the time and confirmed they would look into the matter further.

(e) Between 26 – 28 September 2025, staff at the Wolverhampton Site noticed broken fencing adjacent to the rear of the Wolverhampton Site (pp. 42-43). An additional guard dog was deployed to protect this area.

PRESS ATTENTION

14. On 9 September 2025, I was informed by my colleagues at the Wolverhampton Site that Mr John McEvoy, a journalist at Declassified referenced in Kelly 1, had made an email request to reception at 11:28am. As before, Moog did not answer Mr McEvoy's request for comment.

Docusign Envelope ID: A240AF6C-0EDA-4E2C-AC42-640D889C353D

15. On 22 September 2025, I was alerted by a colleague to an article published on Declassified with the headline: "*UK Aerospace Firm Supplying Israel's Defence Ministry"* (the **"Second Article"**) (pp. 44-49). Similar to the Declassified article of 10 July 2025 that I describe in Kelly 1 (the **"First Article"**), the Second Article alleged that Moog was responsible for supplying equipment from the Wolverhampton Site used to train Israeli pilots to fly advanced fighter jets. It also alleged that Moog was "directly" supplying Israel's Ministry of Defence, and assessed the value of the relevant shipments to be £200,000. I do not know where this assessment of value came from.

16. Since the Incident occurred approximately six weeks after publication of the First Article, I remain concerned that Moog Wolverhampton, and the other Sites, will be the target of further direct action as a result of the Second Article as well as the progress of the criminal proceedings I describe above. This is particularly the case because the Second Article referred directly to the Incident: it contained a description of the Incident, including detail of the Perpetrators' incursion onto the roof of the main building at Moog Wolverhampton. I am worried that the reference to the Incident, together with inflammatory descriptions such as the Perpetrators' clothing containing "*faces of Palestinians killed by Israel,"* will inspire other individuals to commit similar violent acts. Indeed, one incident of drones flying over the Wolverhampton Site on 25 September 2025, coupled with the incidents of 25 September 2025 and 26-28 September 2025 that I describe above, all post-dated the Second Article.

17. Since the Interim Injunction was granted, I have also been made aware that Moog is, and has been since at least 5 September 2025, named on a website that targets companies alleged to be contributing to supplying the Israeli military: Target Map | Dismantling Complicity in Israeli Apartheid. The website links directly to the First Article (p. 50), and also contains a link to PA's "Underground Manual" of PA (containing guidance for those wishing to take part in violent protest activities), mentioned above and referred to in paragraph 82 of Kelly 1 (p. 51).

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: Elwira Kelly 02C7F9F3476624E7... .....

Elwira Kelly

DATED this 1 day of October 2025.

Docusign Envelope ID: A240AF6C-0EDA-4E2C-AC42-640D889C353D

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

Elwira Kelly
Claimant
Fourth Statement
28 July 2026
Exhibit "EK4"

IN THE HIGH COURT OF JUSTICE **CLAIM NO. PT-2025-000910**

CHANCERY 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

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

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

FOURTH 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 three witness statements in these proceedings, the first dated 4 September 2025 (**"Kelly 1"**), the second dated 5 September 2025 (**"Kelly 2"**), and the third dated 1 October 2025 (**"Kelly 3"**). For the avoidance of doubt, capitalised terms in this statement continue to adopt the definitions in Kelly 1.

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 of 6 October 2025 (pp. 1 – 27) (the **"Injunction Order"**). The Injunction Order provides that the injunction will be reviewed annually on each anniversary of the Injunction Order (or as close to that date as is convenient). The Injunction Order was granted against 'Persons Unknown' as more particularly described on the Claim Form and in the Injunction Order itself.

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

3. Moog intends to apply to court to review the injunction in accordance with paragraph 7 of the Injunction Order (the **"Review Application"**), which provides for the injunction to be reviewed annually on each anniversary of the Injunction Order (or as close to this date as is convenient having regard to the Court's list) and for the injunction to lapse at 4pm on the anniversary of the Injunction Order / the last annual review if Moog has not before that date applied for a review to take place. At the review hearing, Moog intends to ask the Court to join four named defendants to the injunction granted by the Injunction Order, being:

   (a) Hanah Yun Stevens;

   (b) Bea Sherman (also known as Frank Sherman);

   (c) Iain Evans; and

   (d) Hisham Alkhamesi,

   (together, the **"Named Defendants"**).

4. Alongside its Review Application, Moog will also be applying to join the Named Defendants to the proceedings and to re-amend the Re-Amended Claim Form and Re-Amended Particulars of Claim to reflect that proposed joinder ("the **Proposed Application**"), and will be asking for the Proposed Application to be considered at the review hearing. I will provide a full explanation for the reasons why Moog seeks to join the Named Defendants to the injunction in my witness statement in support of the Proposed Application and the Review Application in due course. I make this current witness statement in support of Moog's application for service of the Proposed Application and the Review Application, together with documents previously filed by the Claimants in this claim on the Named Defendants by an alternative method or at an alternative place pursuant to CPR 6.15.

5. As previously, I avoid in this statement mentioning my colleagues at Moog and others by name 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.

THE NAMED DEFENDANTS

6. I have explained the background to the Incident of 26 August 2025 in paragraphs 54 to 64 of Kelly 1.

7. The Perpetrators of the Incident were the Named Defendants. I understand from Moog's solicitors that, following the recent High Court decision in *Hanson Quarry Products Europe Ltd v Davies (and others)* [2026] EWHC 118, the Named Defendants – whose identities are known to Moog - should be individually joined to the injunction granted by the Injunction Order. I will set out the reasons why Moog considers the Named Defendants should be

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

joined to this claim in my witness statement in support of the Proposed Application and/or the Review Application.

MEANS OF SERVICE

8. I understand that, before Moog can apply to join the Named Defendants to the proceedings, it requires the court's permission to serve the Proposed Application on the Named Defendants by alternate means. Moog does not have addresses provided by the Named Defendants as addresses at which they may be served in these proceedings, and Moog wishes to ensure that the Proposed Application is effectively served on the Named Defendants in the event that the addresses that Moog has identified in respect of each of the Named Defendants (which I explain further below) are not in fact the usual or last known residences of the Named Defendants, which I understand from Moog's solicitors is the requirement under the Civil Procedure Rules.

9. Moog has made efforts to identify the residential addresses of the Named Defendants. Moog did not have a relationship with the Named Defendants prior to these proceedings and so does not hold their contact details. It is also not possible to obtain this information from the Police.

10. In light of that, Moog instructed a professional company to trace the residential addresses of each of the Named Defendants. I exhibit a copy of the prepared report at (pp. 28 – 35) (the **"Report"**).

11. As is clear from the Report, residential addresses for each of the Named Defendants have been identified. However, as the addresses set out in the Report are linked to family members of some of the Named Defendants (pp. 32 and 34 – 35) (as opposed to the Named Defendants directly), Moog cannot be certain from the Report that each of the Named Defendants currently reside at the addresses detailed in the Report. Moog also cannot be certain that these addresses are the usual or last known residences of the Named Defendants.

12. Nonetheless, I believe service of the proceedings at the addresses identified in the Report will mean that these are likely to come to the attention of the Named Defendants, because:

    (a) With regards to Iain Evans and Hana Yun Stevens, the Report gave a 'high-confidence' association between those Named Defendants and the residential addresses provided;

    (b) With regards to Bea Sherman (now known as Frank Sherman) and Hisham Alkhamesi, the Report has concluded that the addresses identified in the Report are those of the parents of each of the Named Defendants. It is feasible that these

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

Named Defendants, who I understand from public reporting are both 23 years old, reside with their families.

13. The addresses identified in the Report also corroborate the information as to the reported places of residence for each of the Named Defendants in the media in July 2026 (pp. 36 – 37).

14. With that in mind, in order to take steps to bring the documents relevant to these proceedings to the attention of the Named Defendants, Moog seeks an order permitting Moog to serve the Proposed Application, the Review Application and any documents previously filed in these proceedings on the Named Defendants by:

(a) Uploading a copy of those documents to the website www.moog.co.uk/injunction (the **"Website"**);

(b) Posting a copy of those documents to the addresses of each of the Named Defendants as identified in the Report;

(c) Upon making the Review Application, by placing signs at prominent locations on the perimeter of each of the Sites (the **"Signs"**). The Signs will contain a QR code to the Website and will inform the Named Defendants that the Proposed Application and the Review Application has been made.

(d) Alternatively, where requested by a Named Defendant, sending the document by email to an email address provided by the Named Defendant; and

(e) Alternatively, by serving those documents on any solicitor acting for one or all of the Named Defendants who has filed a notice of acting in these proceedings.

15. I have explained above why I believe service at the addresses of each of the Named Defendants (as identified in the Report) is likely to bring the proceedings to the attention of the Named Defendants. In addition to this, Moog intends to adopt the other means of service set out above, because:

The Website and the Signs

(a) Uploading documents to the Website and affixing signs around the perimeters of the Sites were methods that were accepted by the court as a means of service on Persons Unknown when the Injunction Order was granted.

As I explained in paragraphs 69 and 116 of Kelly 1, there is a link between the Named Defendants and Persons Unknown comprising the Defendants in the Injunction Order. There is evidence that the Named Defendants have participated

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

in, and/or are sympathetic to, direct-action protest groups of which Moog is a target, and in relation to which Moog issued proceedings against Persons Unknown. For that reason, we intend to serve the proceedings on the Named Defendants via the same means as we have previously served Persons Unknown.

With regards to the timing of service, paragraph 10 of the Injunction Order provided for notification of any further applications in the proceedings to Persons Unknown to be carried out by erecting notices at a prominent locations at each Site. Moog therefore proposes that, by erecting the Signs referring to both the Proposed Application and the Review Application, these are treated as a further means of service of both applications (as well as notification to Persons Unknown in accordance with the Injunction Order).

Further alternative means

(b) Alternatively, to the extent that any solicitor has filed a Notice of Acting on behalf of the Named Defendants in these proceedings, Moog will effect service on that solicitor directly so that the documents reach the Named Defendants via their legal representatives.

(c) Similarly, service on an email address provided by a Named Defendant, where requested by that Named Defendant, will also be carried out to ensure that the proceedings stand the best chance of reaching the relevant Named Defendant(s) directly.

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: Elwira J. Kelly 92C7F87347624E7...

Elwira Kelly

DATED this 28th day of July 2026.

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

On behalf of Claimant
E Kelly: 4th
Date: 28 July 2026
Exhibit "EK4"

Claim no: PT-2025-000910

IN THE HIGH COURT OF JUSTICE
CHANCERY DIVISION

_____

EXHIBIT EK4_____

_____

Signed: Signed by: Elwira J. Kelly 92C7F87347624E7...

Name: Elwira Kelly
Position: Senior Vice President, General Counsel and Corporate Secretary
Date: 28 July 2026

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

EXHIBIT EK4

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

HIGH COURT OF JUSTICE
08 Oct 2025
THE BUSINESS & PROPERTY COURTS OF ENGLAND & WALES
PT-2025-000910

IN THE HIGH COURT OF JUSTICE **Claim No: PT-2025-000910**

CHANCERY DIVISION

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 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 (FIRST DEFENDANT)

(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 (SECOND DEFENDANT)

(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,

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

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 (THIRD DEFENDANT)

(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 (FOURTH DEFENDANT)

(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 (FIFTH DEFENDANT)

Defendants

ORDER

PENAL NOTICE

IF YOU ARE A PERSON WITHIN THE CATEGORIES OF DEFENDANTS MENTIONED ABOVE ("DEFENDANTS") AND DISOBEY THIS ORDER OR INSTRUCT 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 TO BREACH THE TERMS OF

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

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

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 Thompsell on 6 October 2025

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

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

AND UPON interim injunctive relief having been granted in part by the Honourable Mr Justice Meade on 5 September 2025

AND UPON the Claimants seeking continuation of the interim injunctive relief granted on 5 September 2025 and further injunctive relief preventing the obstruction of or interference with access, as detailed in its application for injunctive relief of 4 September 2025 and draft Order provided therewith

AND UPON READING the Witness Statement of Elwira Kelly dated 4 September 2025, the Second Witness Statement of Elwira Kelly dated 5 September 2025, and the Third Witness Statement of Elwira Kelly dated 1 October 2025, permission to rely on that Third Witness Statement having been granted at the hearing on 6 October 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

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

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

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) deliberately and with knowledge of this Order obstruct or interfere with or attempt to obstruct or interfere with access to or egress from the land and premises shown edged red on Plan 1 with or without vehicles by the First Claimant, its agents, employees, contractors, customers, suppliers or other licencees;

(iii) 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) deliberately and with knowledge of this Order obstruct or interfere with or attempt to obstruct or interfere with access to or egress from the land and premises shown edged yellow on Plan 2 with or without vehicles by the Second Claimant, its agents, employees, contractors, customers, suppliers, or other licencees;

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

(iii) 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) deliberately and with knowledge of this Order obstruct or interfere with or attempt to obstruct or interfere with access to or egress from the land and premises shown edged yellow on Plan 3 with or without vehicles by the Third Claimant, its agents, employees, contractors, customers, suppliers, or other licencees;

(iii) 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;

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

(ii) deliberately and with knowledge of this Order obstruct or interfere with or attempt to obstruct or interfere with access to or egress from the land and premises shown edged red on Plan 4 with or without vehicles by the Fourth Claimant, its agents, employees, contractors, customers, suppliers, or other licencees;

(iii) 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) deliberately and with knowledge of this Order obstruct or interfere with or attempt to obstruct or interfere with access to or egress from the land and premises shown edged red on Plan 5 with or without vehicles by the Fourth Claimant, its agents, employees, contractors, customers, suppliers, or other licencees;

(iii) 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.

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

REVIEW

7. The injunction set out at paragraphs 1 to 6 of this Order shall be reviewed annually on each anniversary of the Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 2 ½ hours. The Claimants are permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton Arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the hearing. The injunction set out at paragraphs 1 to 6 of this Order shall lapse at 4pm on the anniversary of the order (or as the case may be the latest annual review) unless, before then, the Claimants have applied for the review to take place.

SERVICE AND NOTIFICATION

8. Service of this Order is dispensed with, pursuant to CPR 6.28 and 81.4(2)(c).

9. 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 including a QR code linking to the website in paragraph 9(i) above. 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 12 below) shall be replaced with notices in A2 size as soon as reasonably practicable.

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

10. 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.

11. Notification of any further documents to the Defendants may be effected by carrying out the steps set out in paragraphs 10(i) and 10(ii) only.

12. In respect of paragraphs 9 and 10 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.

13. For the avoidance of doubt, in respect of the steps referred to at paragraphs 9(ii), 9(iii), and 10(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.

14. For the purposes of paragraphs 9(ii), 9(iii) and 10(ii), "prominent location" in relation to each Site means:

(i) All of the locations shown marked on the Plans exhibited to the Third Witness Statement of Elwira Kelly including, for the avoidance of doubt, those locations at the sites shown edged yellow on Plan 2 ("the Luton Site") and edged yellow on Plan 3 ("the Reading Site") where additional notices were proposed to be erected as detailed at paragraph 4(e) of the Third Witness Statement of Elwira Kelly;

(ii) At either side of all entrances to the perimeter of each of the Sites;

(iii) On the perimeter fencing for those Sites which are in whole or in part enclosed by a perimeter fence;

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

(iv) At the Reading Site, to the extent not already provided pursuant to paragraph 14(i) to (iii), at the entrance points at the south-east, south-west, north-east and north-west of the boundary of the Site shown edged yellow on Plan 3;

(v) At the Luton Site, to the extent not already provided pursuant to paragraph 14(i) to (iii) above, at the entrance to the parking area and loading bay to Unit J at the north-west of the Site, the western end of the walkway between Units C and J and at the entrance to the car parking area to the south of Unit C, each of which are shown hatched blue on Plan 2.

(vi) In the event that the Second Claimant is unable to display copies of the Order and/or warning notices at each of the locations at the Luton Site as provided for by this paragraph of this Order, the Claimants may apply to Court for directions and/or variation of these requirements (but any such application may be made without notice / notification pursuant to paragraph 10).

VARIATION

15. The Claimants have permission to amend the Claim Form and Amended Particulars of Claim to amend the description of the Defendants in each case by adding after the words "Persons unknown who for the purpose of protest" the words "or sabotage". The Claimants shall notify any persons who may be affected by this amendment by:

(i) Uploading a copy of the amended Claim Form and re-amended Particulars of Claim on to the following website: www.moog.co.uk/injunction; and

(ii) Including reference to this amendment and a link to the website where the amended documents can be found in the warning notices referred to at paragraph 9(iii) above.

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

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

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.

FURTHER EVIDENCE

19. The Claimants have permission to rely on the Third Witness Statement of Elwira Kelly dated 1 October 2025.

COSTS

20. Costs reserved.

COMMUNICATIONS WITH THE CLAIMANTS

21. The Claimants' contact details are:

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

(2) mooglegal@moog.com.

Dated: 6 October 2025

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

SCHEDULE 1 – UNDERTAKINGS

1. 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.

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

SCHEDULE 2 – PLANS

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

Plan 1



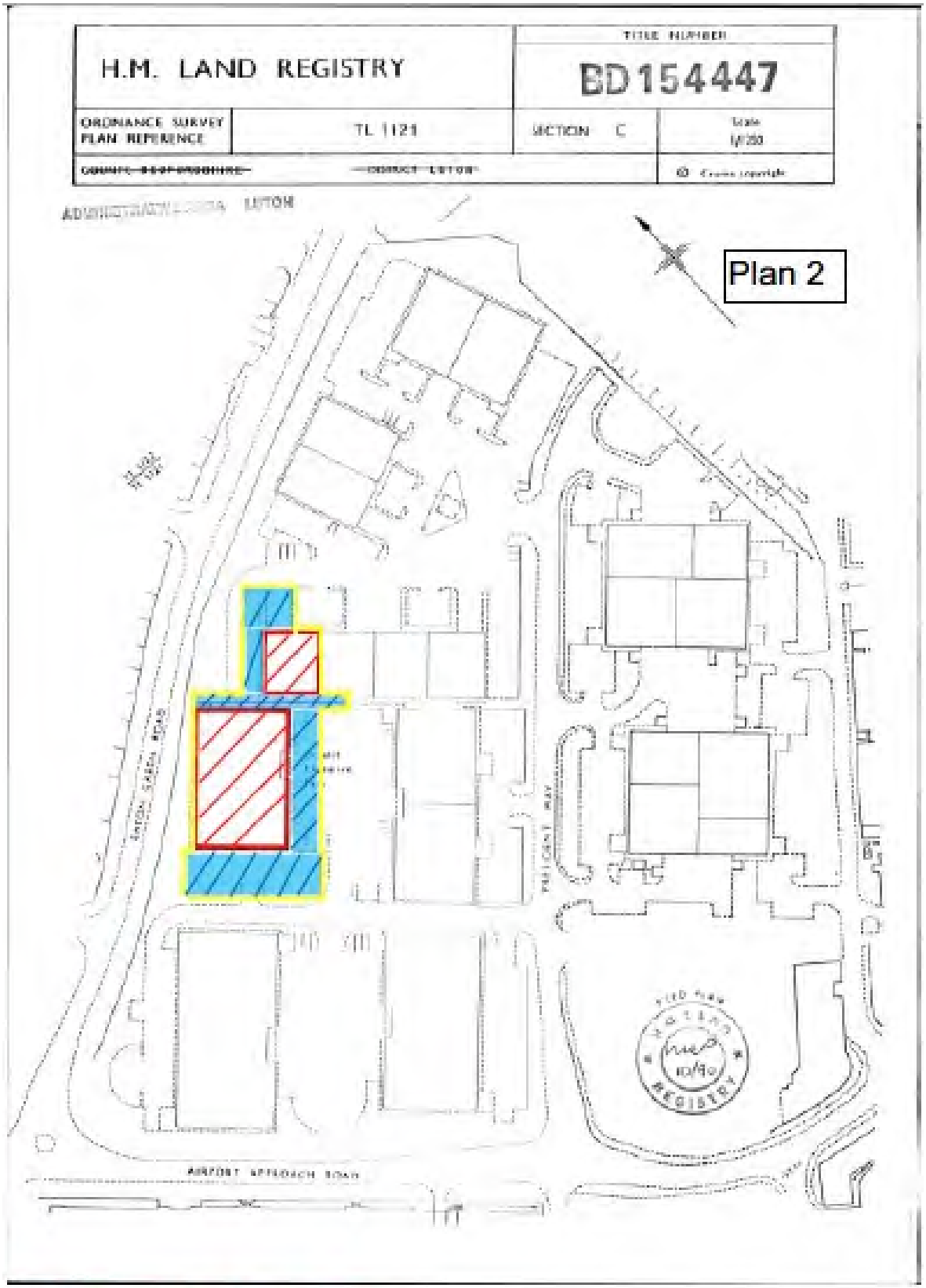
Case Reference: 1H5451.000327 updated plan

M O O G
Valiant Way
Wolverhampton
WV9 5GB

©Crown copyright and database rights 2025. OS AC0000850529

Ordnance Survey
Licensed Data

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A



This official copy is incomplete without the preceding notes page.

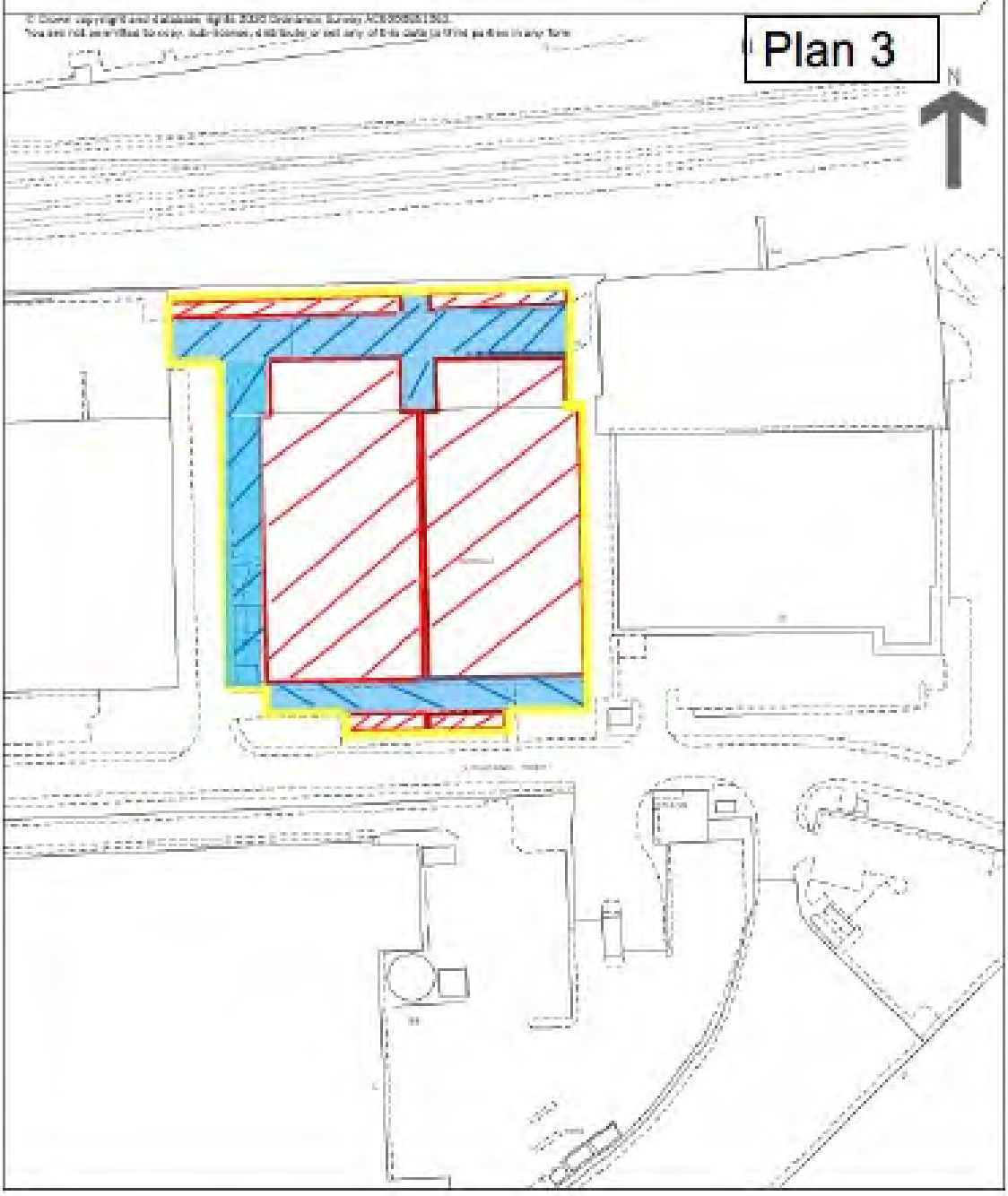
Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

HM Land Registry
Official copy of title plan

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

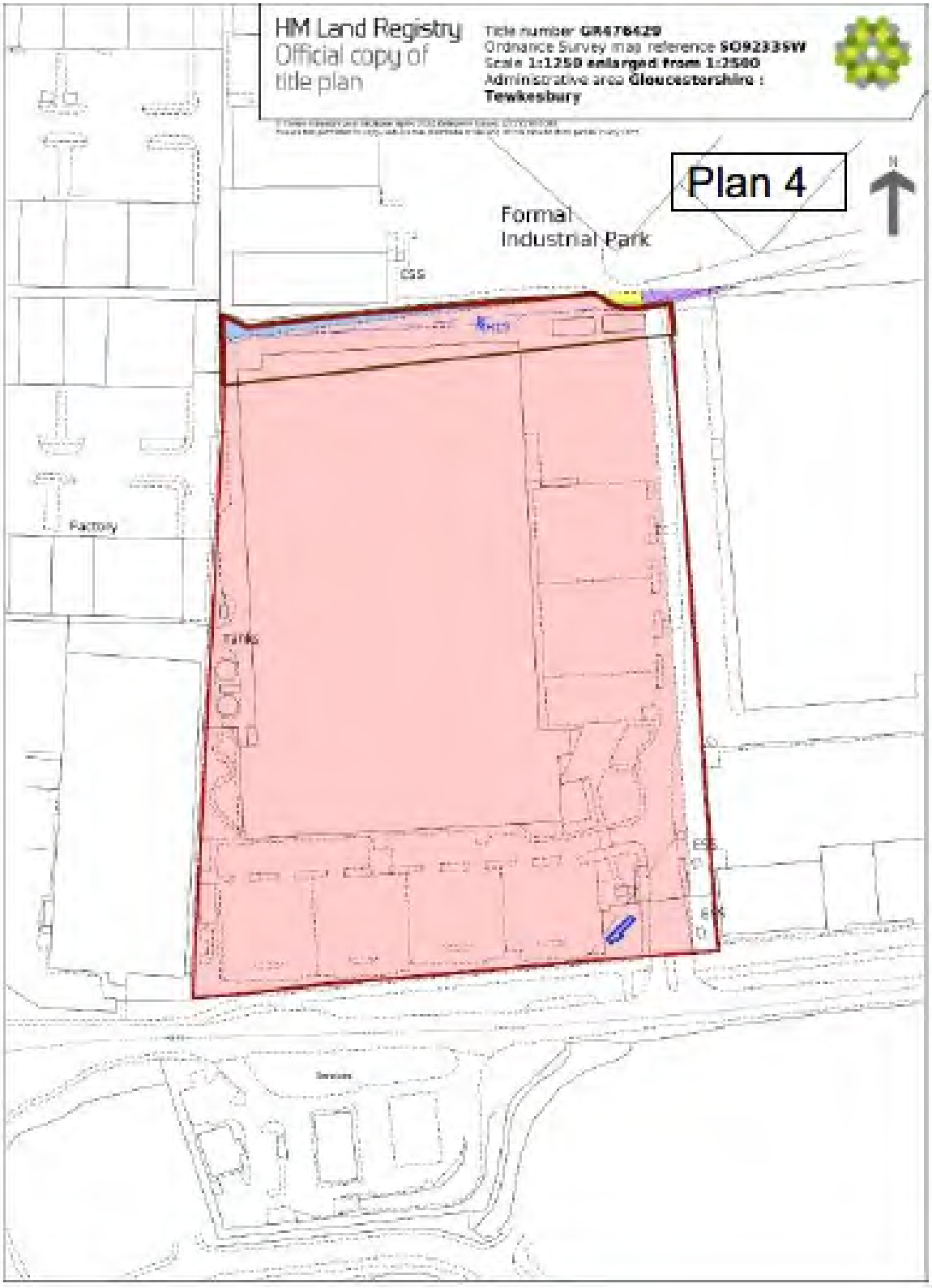
© Crown copyright and database rights 2020 Ordnance Survey 100026316.
You are not permitted to copy, sub-license, distribute or sell any of this data to third parties in any form.

Plan 3



This official copy is incomplete without the preceding notes page.

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

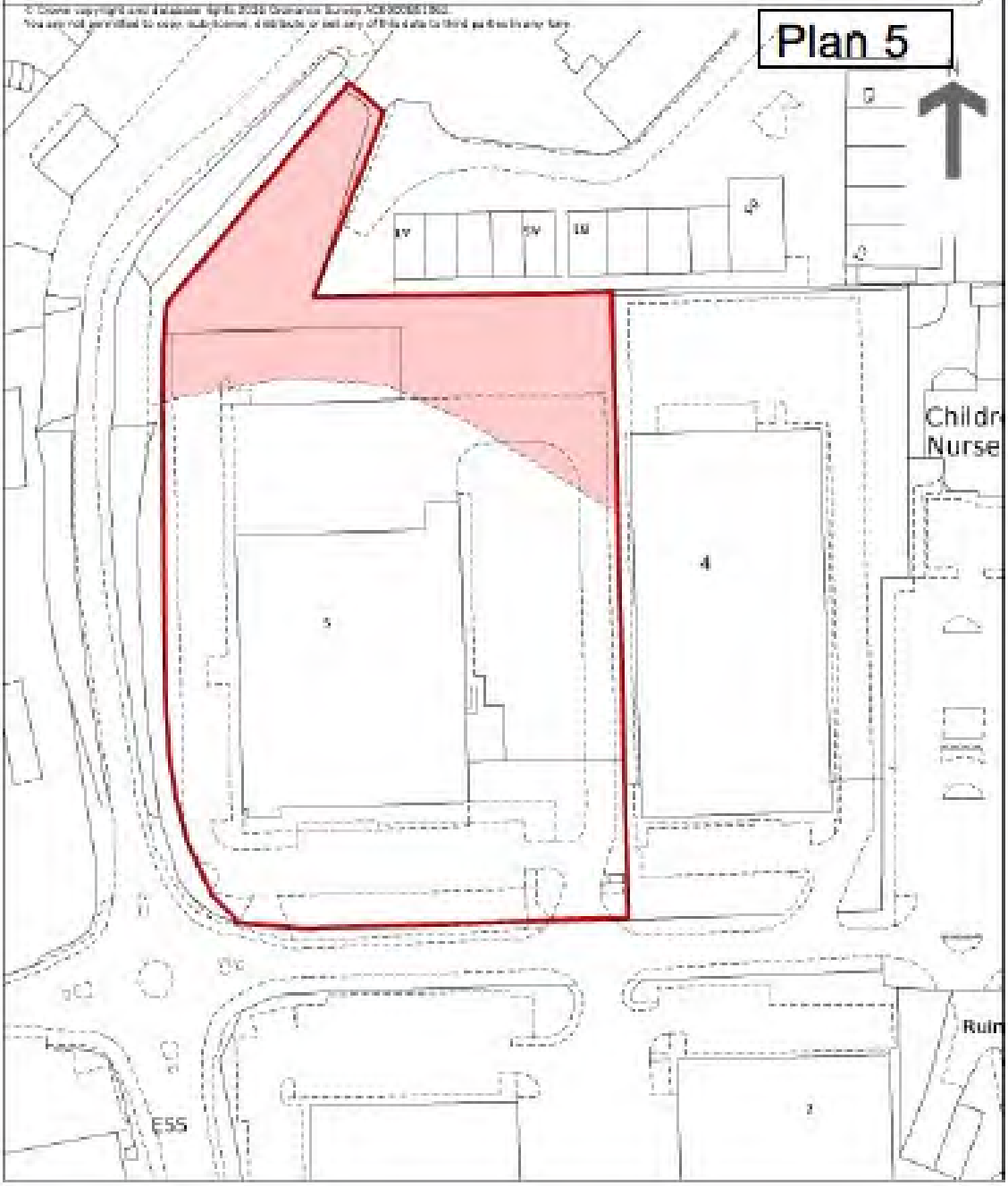


This official copy is incomplete without the preceding notes page.

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

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**



This official copy is incomplete without the preceding notes page.

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

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 6 October 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 OR SABOTAGE 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. **DELIBERATELY AND WITH KNOWLEGDE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 1**
3. **INTERFERE OR ATTEMPT TO INTERFERE WITH ANY OF THE SERVICES SERVING THE LAND AND PREMISES SHOWN EGDED 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 (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest) can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

Plan 1



380526E, 333524N

Case Reference: 1H5451.000327 updated plan

M O O G
Valiant Way
Wolverhampton
WV9 5GB

©Crown copyright and database rights 2025. OS AC0000850529

Ordnance Survey
Licensed Data

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 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 OR SABOTAGE 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. **DELIBERATELY AND WITH KNOWLEDGE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED YELLOW ON PLAN 2**
3. **INTERFERE OR ATTEMPT TO INTERFERE WITH ANY OF THE SERVICES SERVING THE LAND AND PREMISES SHOWN EGDED YELLOW ON PLAN 2**

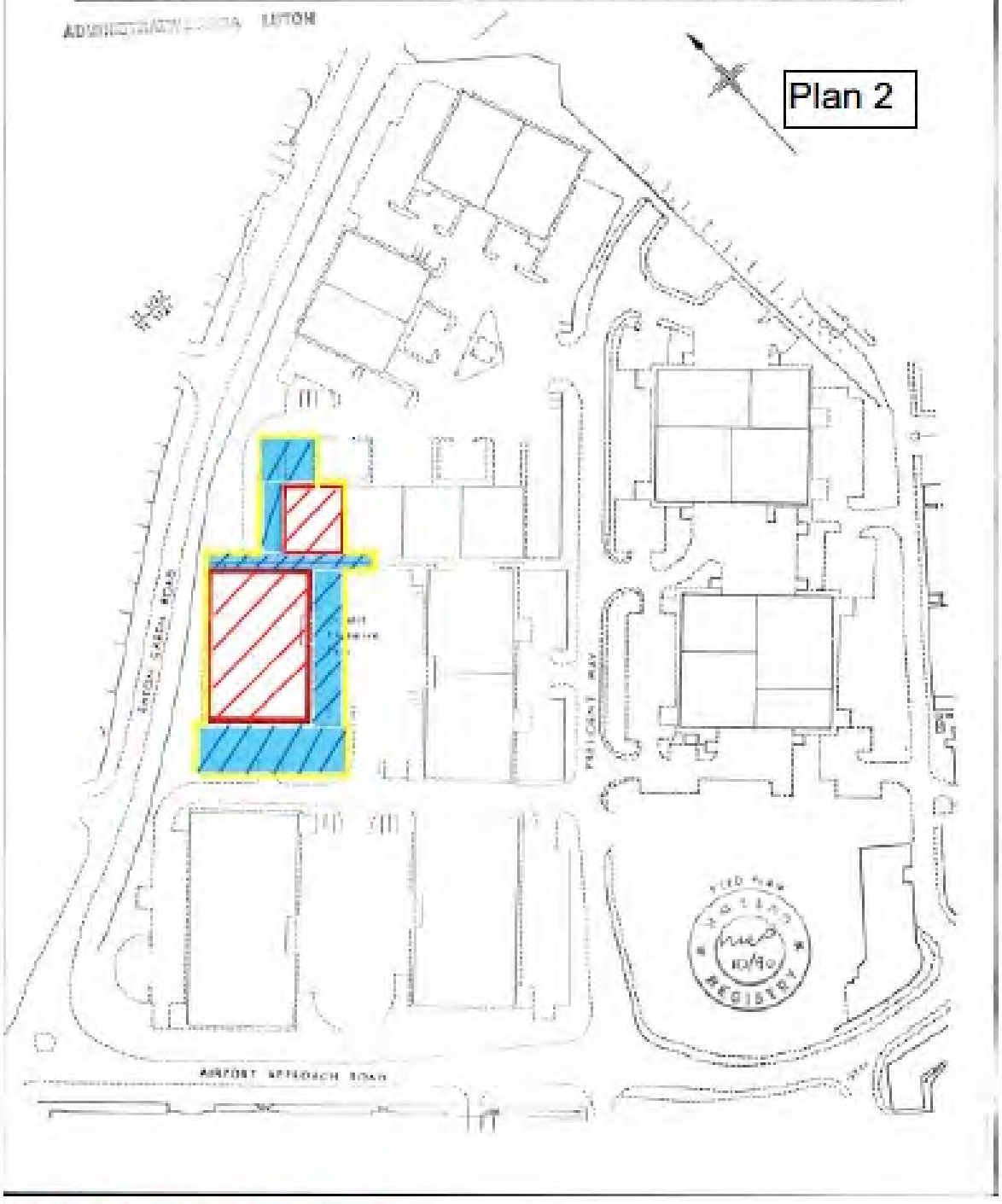
ANYONE BREACHING THE TERMS OF THIS COURT ORDER OR ASSISTING ANY OTHER PERSON IN BREACHING THE TERMS OF THIS ORDER MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE SENT TO PRISON, FINED OR HAVE THEIR ASSETS SEIZED

A copy of the Order and the legal proceedings to which it relates (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest)can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

H.M. LAND REGISTRY		TITLE NUMBER BD154447	
ORDNANCE SURVEY PLAN REFERENCE	TL 1121	SECTION C	Scale 1/250
~~COUNTY~~ ~~ADMINISTRATIVE AREA~~	~~DISTRICT~~ LUTON		© Crown copyright

Plan 2



This official copy is incomplete without the preceding notes page.

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 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 OR SABOTAGE 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. **DELIBERATELY AND WITH KNOWLEGDE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED YELLOW ON PLAN 3**
3. **INTERFERE OR ATTEMPT TO INTERFERE WITH ANY OF THE SERVICES SERVING THE LAND AND PREMISES SHOWN EGDED 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 (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest)can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com

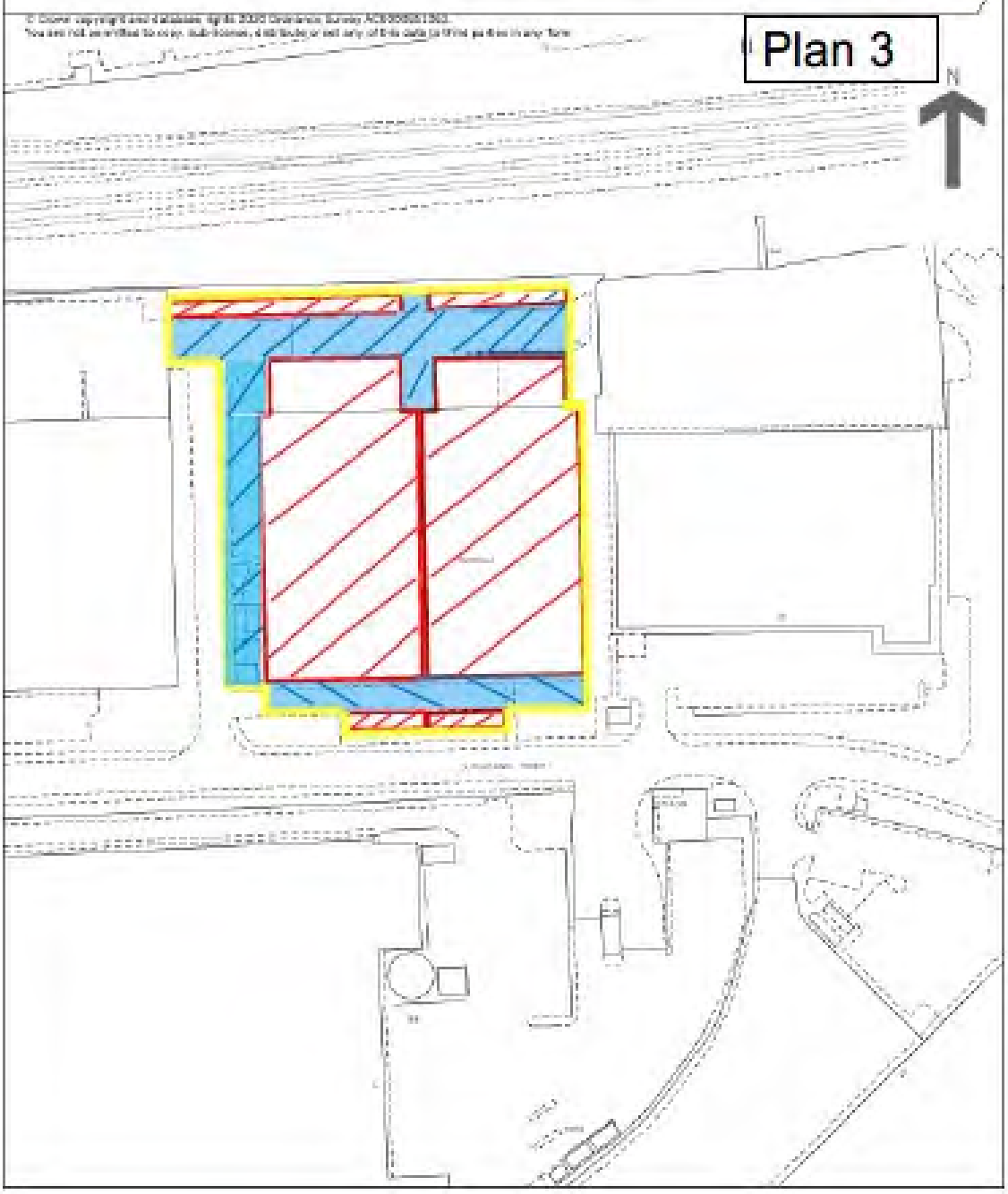
Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

HM Land Registry
Official copy of title plan

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

© Crown copyright and database rights 2020 Ordnance Survey AC0000851362.
You are not permitted to copy, sub-license, distribute or sell any of this data to third parties in any form.

Plan 3



This official copy is incomplete without the preceding notes page.

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Aircraft Group Tewkesbury, Ashchurch, Tewkesbury, Gloucestershire, GL20 8NA.

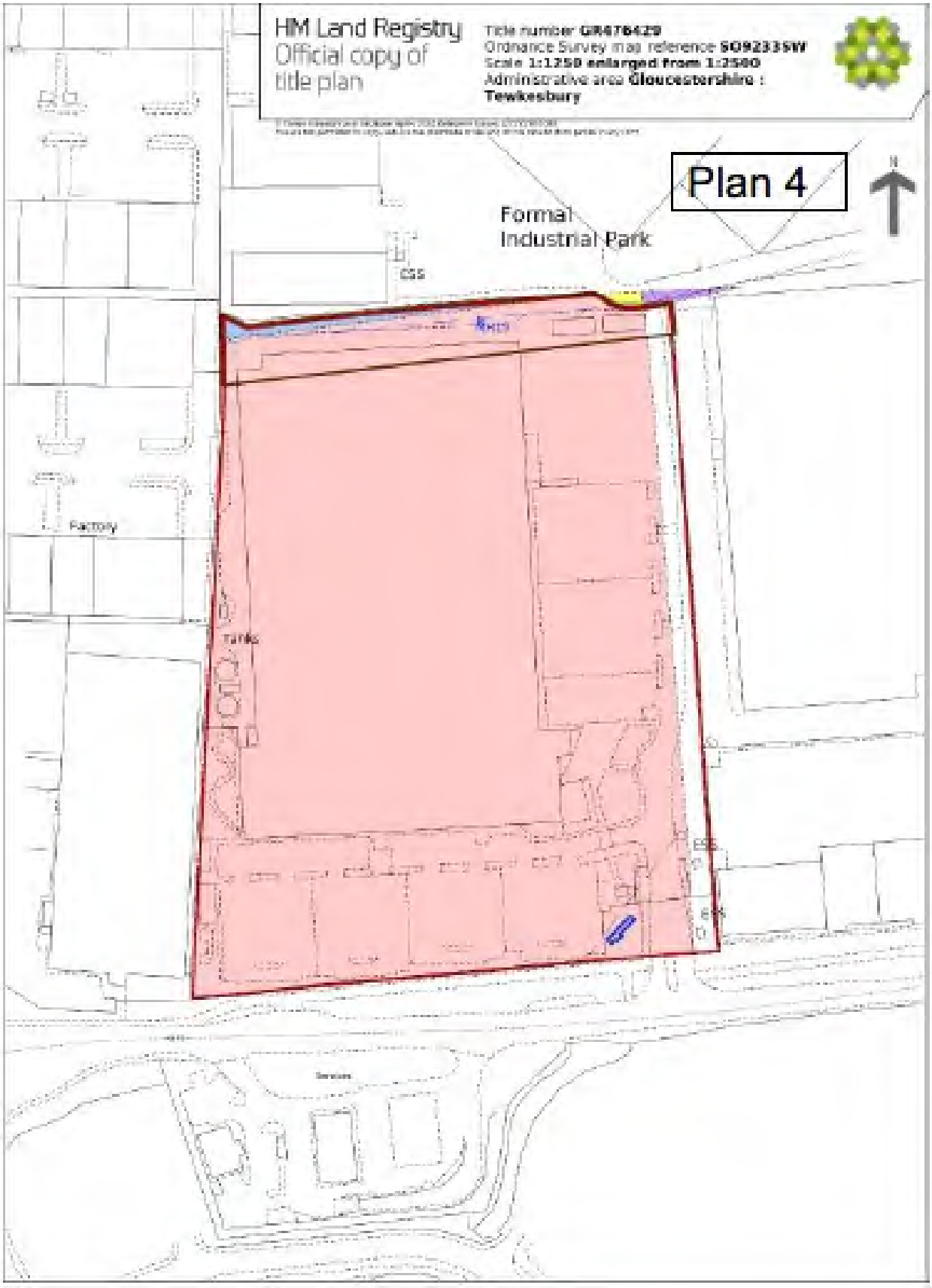
The injunction means you may not:

1. **FOR THE PURPOSE OF PROTEST OR SABOTAGE 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. **DELIBERATELY AND WITH KNOWLEGDE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 4**
3. **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 (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest) can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A



This official copy is incomplete without the preceding notes page.

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 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 OR SABOTAGE 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. **DELIBERATELY AND WITH KNOWLEDGE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 5**
3. **INTERFERE OR ATTEMPT TO INTERFERE WITH ANY OF THE SERVICES SERVING THE LAND AND PREMISES SHOWN EGDED RED ON PLAN 5**

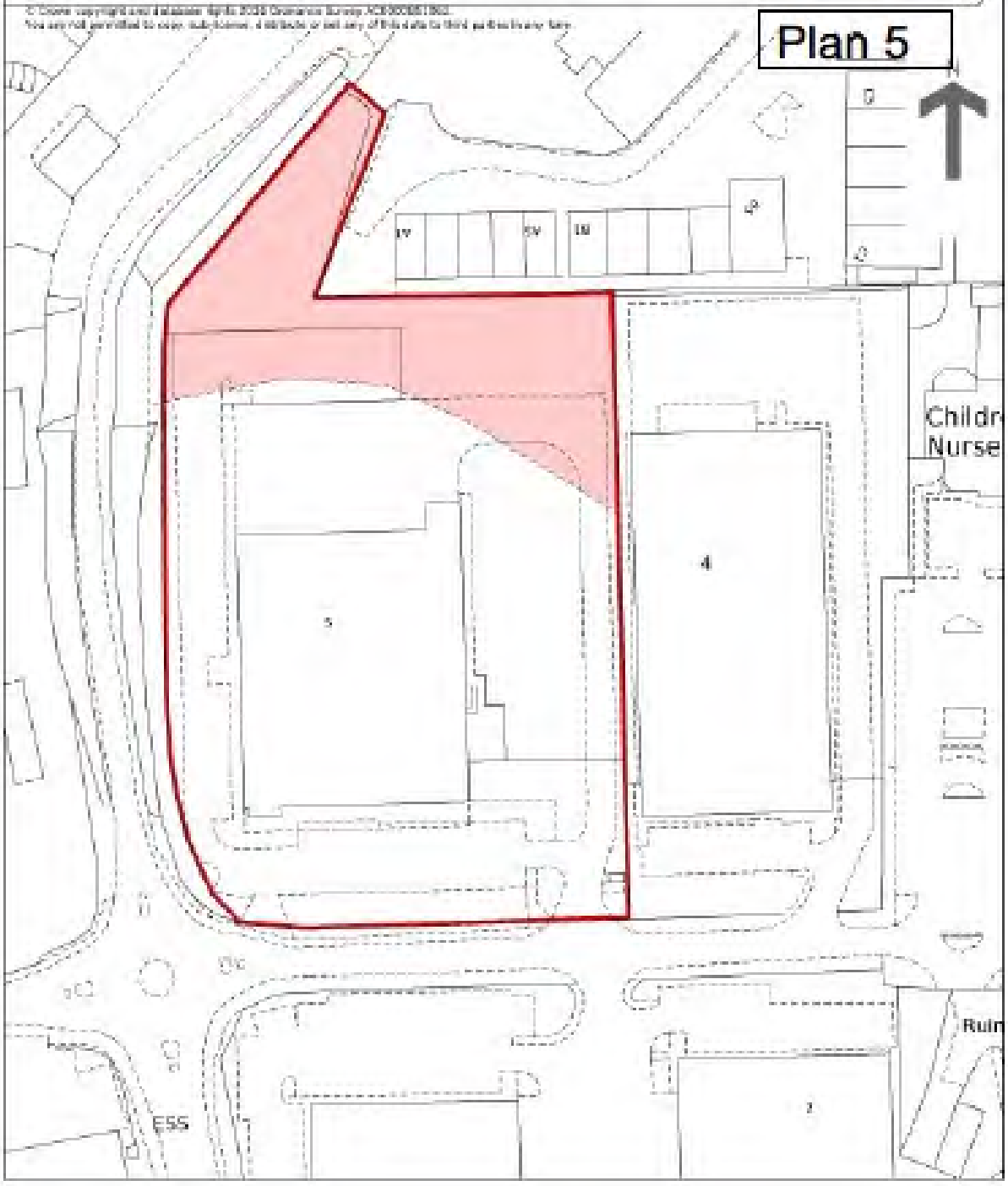
ANYONE BREACHING THE TERMS OF THIS COURT ORDER OR ASSISTING ANY OTHER PERSON IN BREACHING THE TERMS OF THIS ORDER MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE SENT TO PRISON, FINED OR HAVE THEIR ASSETS SEIZED

A copy of the Order and the legal proceedings to which it relates (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest)can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com:

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

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**



This official copy is incomplete without the preceding notes page.

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

[redacted]

OPEN-SOURCE INVESTIGATION

‘Moog 4’ Associated Address Search

Prepared for: MOOG

Prepared by: [redacted]

Date: 5 May 26

Reference: [redacted]

Classification: CLIENT CONFIDENTIAL

Version: 1.0

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

CONTENTS

1. Purpose and Scope
2. Methodology
3. Intelligence Limitations
4. Executive Summary
5. Findings
    6.1 Iain Evans
    6.2 Hana Yun Stevens
    6.3 Bea Sherman
    6.4 Hisham Alkhamesi
6. Sources

DOCUMENT CONTROL

Version	Date	Author	Summary of Changes
1.0	5 May 2026	[redacted]	Initial issue

DISTRIBUTION

This document is intended solely for:

- Moog and associated legal representatives

Further dissemination without permission is not advised.

CLASSIFICATION

CLIENT CONFIDENTIAL

This document contains analytical assessment derived from open-source information and observations. It is intended for internal risk assessment purposes only.

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

1. PURPOSE AND SCOPE

This report assesses publicly available information relating to identified subjects and evaluates the extent to which residential address information can be identified through lawful open-source research techniques.

The report is restricted to open-source information and does not constitute confirmation of residency or ownership beyond the evidence identified.

2. METHODOLOGY

Online searches were conducted across publicly available sources including:

- Electoral roll records
- Property ownership records
- Public reporting
- Open social media
- Publicly accessible people-search and directory services

Targeted Boolean search techniques were employed.

Where possible, social media and public reporting were used to assess attribution and identify potential familial associations.

No covert methods or protected datasets were utilised.

3. INTELLIGENCE LIMITATIONS

This assessment is subject to limitations inherent within open-source investigations and the datasets available at the time of research:

- Information obtained from publicly available sources may be incomplete, outdated, inaccurate or subsequently amended.
- Electoral roll records do not represent a comprehensive record of residency. Individuals may be omitted from publicly accessible electoral roll datasets, have opted out of edited registers, or may not appear due to the limitations of individual data providers.
- Property ownership records do not necessarily indicate current residency. Individuals may own property whilst residing elsewhere, and occupiers may not have a legal ownership interest in the property in which they reside.
- Public reporting and media articles may contain inaccuracies or information that cannot be independently verified within the scope of this investigation.
- Familial associations identified through open-source research are based on publicly available information and, unless otherwise stated, should not be regarded as conclusively verified.
- Where multiple sources indicate an association between an individual and an address, confidence in attribution increases. However, definitive confirmation of residency would require access to information beyond the scope of this investigation.
- Absence of information should not be interpreted as evidence that no relevant information exists. It may instead reflect privacy settings, data retention practices, source availability or limitations in publicly accessible records.

Analytical judgements contained within this report should therefore be interpreted proportionately and within the context of the stated intelligence limitations.

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

4. EXECUTIVE SUMMARY

At the request of Moog, an open-source investigation was conducted to identify residential address information associated with the subjects of interest through publicly accessible legal, regulatory and other online records.

The investigation identified several records linking the subjects to current and/or historical residential addresses and, in some cases, associated family members. Open-source research identified current or historic address information for three of the four subjects. In the case of Iain Evans and Hana Yun-Stevens, records identified addresses assessed to be their current residences. In the cases of Bea Sherman and Hisham Alkhamesi, direct address attribution could not be established; however, addresses associated with individuals assessed to be close family members were identified.

The findings demonstrate that varying degrees of residential information relating to the subjects remain accessible through lawful open-source research techniques. Such information may contribute to wider profiling efforts when combined with information obtained from additional sources.

This report is based exclusively on information obtained from publicly available open sources. Whilst reasonable efforts have been made to assess the credibility and relevance of identified information, open-source material cannot always be independently verified, corroborated or confirmed as current. Where possible, additional sources, including social media and publicly available reporting, were used to assess attribution and familial associations. Findings should therefore be considered indicative rather than definitive and interpreted within the context of the report's stated limitations.

5. FINDINGS

5.1 Iain Evans

- Public reporting relating to the proceedings states that Iain Evans resides in Shipley, West Yorkshire.
- Property ownership records identify Iain Evans as the registered owner of **13 Fanny Street, Shipley, West Yorkshire, BD18 4QB**, since October 2019.
- Electoral roll records indicate that Iain Evans is currently registered at this address.
- Historic electoral roll records identify Iain Evans as previously registered between 2012 and 2018 at 7 West Lea Grove, Yeadon, Leeds, West Yorkshire, LS19 7EF.
- Iain Evans remains listed as a co-owner of the Yeadon property.
- The property is currently occupied by Claire Evans and Leah Evans, who may be related to Iain Evans.

***Assessment**: Multiple independent sources identify both current and historic address information associated with Iain Evans. Property ownership records and electoral roll data provide high-confidence attribution.*

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

5.2 Hana Yun-Stevens

- Public reporting relating to the proceedings states that Hana Yun-Stevens resides in London.
- Electoral roll records identify Hana Yun-Stevens as registered at **Flat 139, Queen Alexandra Mansions, Bidborough Street, London, WC1H 9DL**.
- Records indicate registration at this address for approximately four years.
- No evidence was identified indicating ownership of the property by Hana Yun-Stevens.

***Assessment**: Electoral roll information provides a high-confidence association between Hana Yun-Stevens and the identified address.*

5.3 Bea Sherman

- Public reporting relating to the proceedings states that Bea Sherman, also referred to as Frank Sherman, resides in Hassocks, Sussex.
- Searches did not identify electoral roll or property ownership records directly attributable to either Bea Sherman or Frank Sherman.
- Open-source enquiries identified one address within Hassocks currently occupied by individuals with the Sherman surname.
- Kate Sherman and Martin Sherman have been listed as residents of **4 Clayton Road, Ditchling, Hassocks, East Sussex, BN6 8UY** since May 2004.
- Public reporting suggests that Kate and Martin Sherman are the parents of Bea Sherman.

***Assessment**: No direct residential address attribution was identified for Bea Sherman. However, an address associated with individuals assessed to be close family members was identified through open-source research. Confidence is assessed as medium due to reliance on inferred familial association.*

5.4 Hisham Alkhamesi

- Public reporting relating to the proceedings states that Hisham Alkhamesi resides in Hinckley, Leicestershire.
- No electoral roll records directly attributable to Hisham Alkhamesi were identified.
- A historic electoral roll entry was identified for Zubair A Alkhamesi at **61 Holt Road, Burbage, Hinckley, Leicestershire, LE10 2PZ**.
- The records identified Zubair A Alkhamesi as registered at the address during 2005 and 2013.
- Mary Hall is identified as a resident and owner of the property.
- Public reporting suggests that Mary Hall and Zubair Alkhamesi are the parents of Hisham Alkhamesi.
- Subsequent electoral roll records indicate that other individuals have since been registered at the address.

***Assessment**: No direct residential information relating to Hisham Alkhamesi was identified. Open-source research identified an address associated with individuals assessed to be his parents. Confidence is assessed as medium due to the indirect nature of the attribution.*

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

6. SOURCES

[1] https://www.theguardian.com/lifeandstyle/2016/oct/02/modernist-romance-an-artistic-couple-and-their-modernist-house

[2] https://www.gseller.co.uk/obituaries/peter-anthony-stuart-hall

Additional sources:

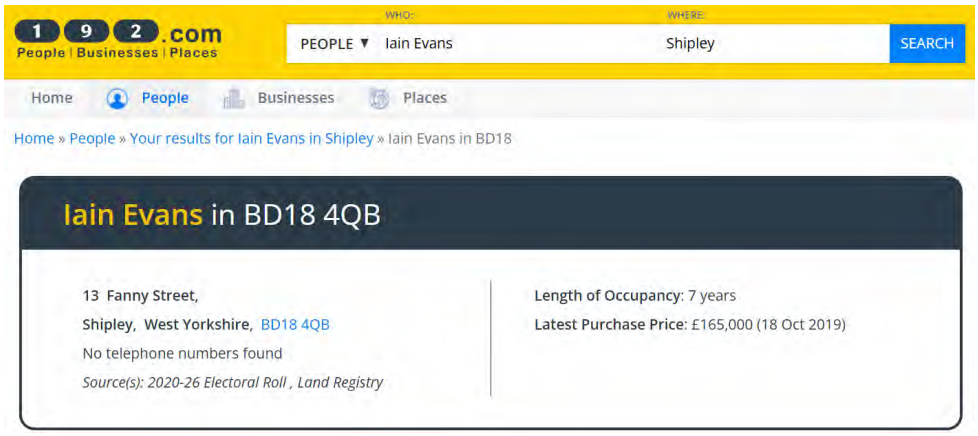
• Electoral roll records

• Land Registry ownership records

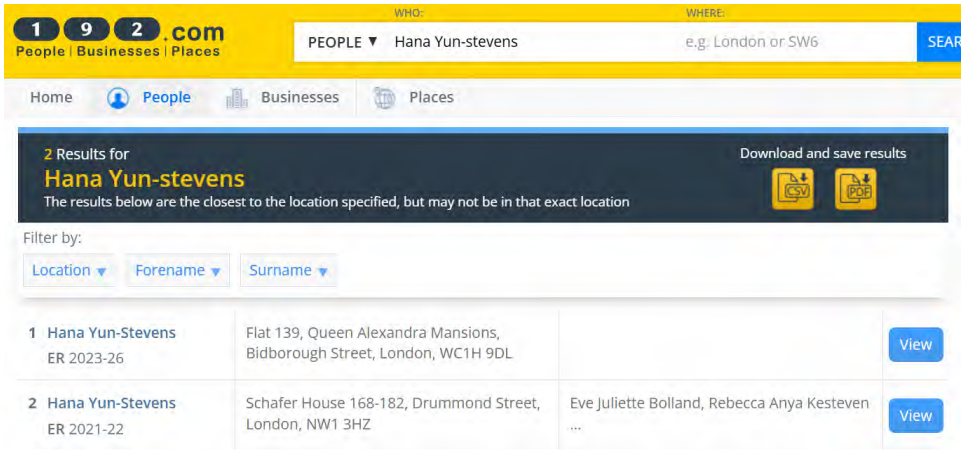
• Public reporting relating to the proceedings

• Publicly accessible social media profiles

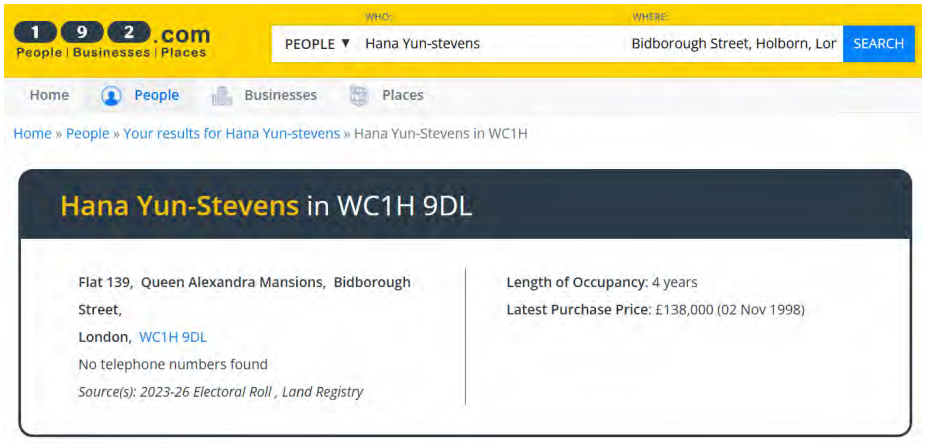
Iain Evans



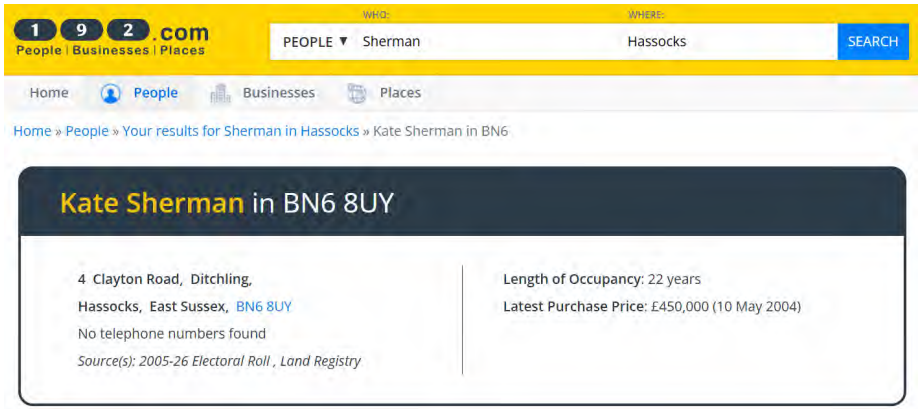
Hana Yun-Stevens



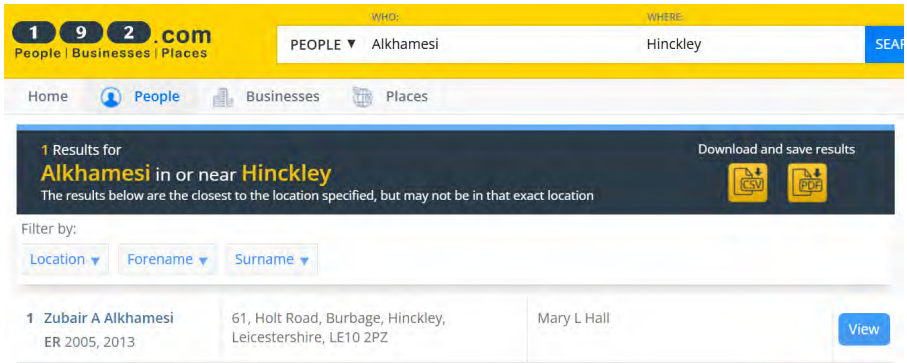
Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

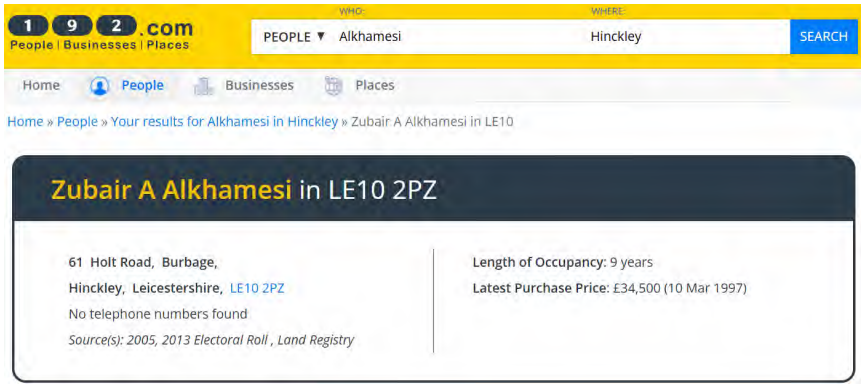


Bea Sherman



Hisham Alkhamesi





Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

Mary L Hall in LE10 2PZ

61 Holt Road, Burbage,
Hinckley, Leicestershire, LE10 2PZ
Phone number: 01455 447 790
Source(s): 2002, 2013 Electoral Roll , Directory Enquiries , Land Registry

View Length of Occupancy
Latest Purchase Price: £34,500 (10 Mar 1997)

Peter Anthony Stuart Hall

15th Aug 1934 — 22nd Jan 2020

Parish councillor for Burbage, passed away peacefully, surrounded by his family, after a short illness, at the George Eliot Hospital on the 22nd January 2020, aged 85 years. He is survived by beloved wife Ann, children Martin, Sue, Mary and Robert, grandsons Atticus, Reuben, Hisham and Faris, wider family and a large circle of friends. The family would particularly like to thank medical and nursing staff at the George Eliot Hospital, AMU, CCU, A&E, Cardiac Rehab team and the ambulance crew from EMAS for their expertise and support during Peter's last illness. All are welcome to attend a celebration

Funeral Service

Date:
Wednesday 5th February 2020

Location:
Burbage Millennium Hall

ENDS

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

Pro-Palestine protesters face retrial over damage



Prosecutors confirmed they intend to re-try four people who deny acting unlawfully in connection with damage caused at Moog Wolverhampton Ltd

3 July 2026

Four pro-Palestine protesters accused of causing criminal damage to an aerospace factory are to face a retrial next year.

Iain Evans, 33, Hisham Alkhamesi, 23, Hana Yun-Stevens, 24, and Frank Sherman, 23, also known as Bea Sherman, all deny acting unlawfully when damage was caused to Moog Wolverhampton Ltd in August last year.

Docusign Envelope ID: 17BEA5AE-F25C-84E4-8291-7963B538157A

Prosecutors allege the defendants, who believed the business was involved in the supply chain to Israel, had no lawful excuse to act as they did.

Last month, a jury failed to reach a verdict and earlier on Friday, judge Mr Justice Wall said a trial would start on 8 March "or very shortly thereafter".

Evans, of Saltaire in Shipley, West Yorkshire, Alkhamesi, of Burbage, near Hinckley, Leicestershire, Yun-Stevens, from south-west London, and Sherman, of Ditchling, East Sussex, have pleaded not guilty to a single count of causing criminal damage to property.

The defendants, who spoke only to confirm their identities, all appeared at Birmingham Crown Court via video-link, to hear prosecutor Rupert Jones apply for the case to be re-tried.

The Crown alleges the four caused criminal damage at the factory in the Pendeford area of Wolverhampton by cutting away sections of roofing using power tools and smashing hundreds of solar panels.

Setting a date for a re-trial expected to last for about five days at a court venue which has yet to be finalised, the High Court judge said: "In the case of each of the four defendants I will extend bail on the same terms as they have been up until today."

The jury at Birmingham Crown Court failed to reach any verdicts on the defendants in June.

Get in touch

Tell us which stories we should cover in Wolverhampton

Contact form

*Follow BBC Wolverhampton & Black Country on **BBC Sounds**, **Facebook**, **X** and **Instagram**.*

Related topics

Shipley **Burbage** **Wolverhampton** **Ditchling**

Related internet links

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

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

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

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"**).

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

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

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

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

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

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, 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:

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

(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

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

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).

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

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

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

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.

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

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

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

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 (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.

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

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

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

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: Elwira J. Kelly 92C7F87347624E7... ……

Elwira Kelly

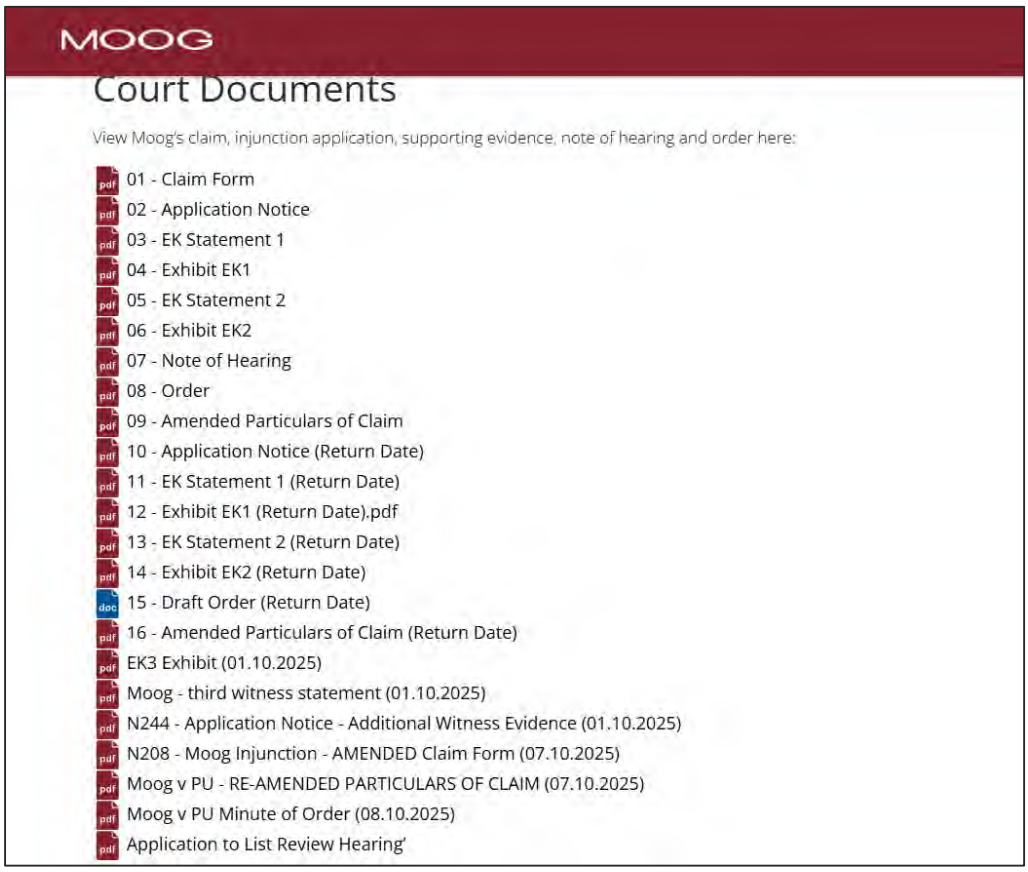
DATED this 2nd day of October 2026.

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

Schedule 1

Notification of Injunction Order

A. Screenshot of the Moog injunction website



Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

B. Signage

Wolverhampton Site

Steps taken to comply with requirements of Injunction Order	**Photographs**	**Date / time**
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 "**Prominent Locations**"). 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).	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

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

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

the Injunction Order put up at all Prominent Locations. 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

Steps taken to comply with requirements of Injunction Order	**Photographs**	**Date and time**
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

Steps taken to comply with requirements of Injunction Order	**Photographs**	**Date and time**
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

Docusign Envelope ID: 67B0F917-2A36-804D-81B3-0CA722132F91

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

Steps taken to comply with requirements of Injunction Order	**Photographs**	
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.

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

Claimant

Elwira Kelly

5th Statement

2 October 2026

Exhibit "EK5"

IN THE HIGH COURT OF JUSTICE
BUSINESS AND PROPERTY
DIVISION

CLAIM NO: PT-2025-000910

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

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

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

EXHIBIT EK5

This is the exhibit EK5 referred to in the fifth Witness Statement of Elwira Kelly

Signed Signed by: Elwira J. Kelly 92C7F87347624E7... ……..

Elwira Kelly

Dated: 2 October 2026

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

Alleged pro-Palestine protesters in court hearing



The site near Wolverhampton was broken into in August

3 October 2025

Four alleged pro-Palestine protesters have appeared at the Old Bailey accused of causing more than £1m of damage after breaking into a defence manufacturer's factory.

Iain Evans, 32; Hisham Alkhamesi, 22; Bea Sherman, 22; and Hana Yun Stevens, 23, appeared by videolink from custody for a preliminary hearing on Friday morning.

They are each charged with a single count of criminal damage on 26 August.

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

It is alleged they "destroyed or damaged property to a value estimated to be over £1m belonging to Moog Inc" in Pendeford, near Wolverhampton, without lawful excuse.

The two men and two women spoke to confirm their identities before Mrs Justice Cheema-Grubb set a timetable for the case.

A plea and trial preparation hearing is due for the Old Bailey on 13 February.

A provisional three-week trial has been set for Birmingham Crown Court from 8 June 2026 before a High Court judge.

Evans, from Shipley, West Yorkshire; Alkhamesi, of Hinckley, Lincolnshire; Sherman, of Hassocks, West Sussex; and Stevens, of south-west London, were remanded into custody.

It is alleged that members of a group, named online as Palestinian Martyrs, broke in and got on to the roof of the Moog Aircraft Group factory at 03:50 BST on 26 August.

Significant damage was caused to a number of skylights and solar panels, Staffordshire Police said.

Social media posts at the time of the break-in claimed Moog was supplying aircraft parts fitted to fighter jets used by the Israeli military.

Get in touch

Tell us which stories we should cover in Wolverhampton

Contact form

*Follow BBC Wolverhampton & Black Country on **BBC Sounds**, **Facebook**, **X** and **Instagram**.*

Related topics

Wolverhampton **Israel-Gaza war**

Related internet links

HM Courts & Tribunals Service

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

Pro-Palestinian protester 'wanted to shut factory'



Hana Yun-Stevens (left), Bea Sherman, also known as Frank (centre) and Iain Evans (right) are standing trial along with Hisham Alkhamesi

9 June 2026

A pro-Palestinian protester accused of causing criminal damage to an aerospace factory said he wanted to shut the facility down for days to try to save lives.

Four activists targeted Moog Wolverhampton Limited because they believed the business was involved in the supply chain to Israel, Birmingham Crown Court has heard.

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

Iain Evans, 33, Hisham Alkhamesi, 23, Bea Sherman, 23 and also known as Frank Sherman, and Hana Yun-Stevens, 24, have denied causing criminal damage to property.

Prosecutors allege they acted unlawfully in smashing solar panels and windows after scaling the roof of the factory on 26 August. Evans said: "We believed the longer we stayed up there, the more lives we would save."

"I think the idea to go to Moog was initially my idea," he also stated.

The defendant, from Fanny Street in Saltaire, West Yorkshire, confirmed he had conducted "reconnaissance" of the factory on foot on 5 August and was the driver of a Land Rover which smashed through gates in the early hours of 26 August.

Asked why the group had taken food and tents to the site in Pendeford, Staffordshire, Evans answered: "I was hoping to stay up on the roof for as long as possible – ideally several days if we could.

"The idea was that the longer we stay on the roof, the longer the factory would be shut down."

The Keele University physics and maths graduate claimed the group had chosen a bank holiday as there would be no night shift and "we didn't want to potentially cause harm to anyone".



STAFFORDSHIRE POLICE

The jury has been shown footage of the group on the factory roof

Yun-Stevens, from south-west London, said she had worn a camera and thrown a smoke grenade to make the group less visible.

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

The former care assistant and University College London Fine Art student stated she had appeared in footage posted to social media because the activists "wanted people to know what the factory was doing".

"We wanted to be arrested and have a trial to determine the criminality of our actions," Yun-Stevens said, adding the four defendants had deemed the factory's operations to be "criminal".

Alkhamesi said he had struggled with his mental health after following world events during his studies at the University of Southampton.

Asked if he accepted smashing solar panels, Alkhamesi, from Burbage, near Hinckley, Leicestershire, stated: "Yes. As Iain said we intended to disrupt production and shipment."

Sherman, from Ditchling, East Sussex, said she had previously volunteered to help refugees in Calais and Greece, as well as working in shops and a museum.

The group had gone to the factory and "worked together" to "disarm" it and put it out of action, she said.

Prosecutors have accepted the group held very strong beliefs about the war in Gaza, but have said "smashing up a business because you don't agree with what they do, and want to disrupt their business, is not a lawful excuse".

The trial continues.

Get in touch

Tell us which stories we should cover in Wolverhampton

Contact form

*Follow BBC Wolverhampton & Black Country on **BBC Sounds**, **Facebook**, **X** and **Instagram**.*

Related topics

Wolverhampton

More on this story

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

Breaking: 'Moog 4' walk free as jury refuses to convict

by **Skwawkbox** — 18 June 2026 in **Skwawkbox's Opinion** Reading Time: 3 mins read 281 3 AA 3

Share on Facebook Share on Twitter Share on Bluesky Share via WhatsApp Share via Telegram Share on Threads

The 'Moog 4' anti-genocide activists who were put on trial for direct action against an arms firm supplying Israel have walked free from Birmingham Crown Court today. The jury in the trial was split and refused to convict the activists despite the prosecution claiming the decision to convict would be "simple".

The activists were charged with breaking into the Wolverhampton factory of Moog Aircraft Group, which supplies parts to Israel for the colony's F-35 strike aircraft used to slaughter Palestinian civilians. They were accused of damaging weapons components and occupying the factory's roof. They told the jury that:

> *We believed the longer we stayed up there, the more lives we would save. The idea was that the longer we stay on the roof, the longer the factory would be shut down.*

Moog 4 — Freedom to defend

Unlike in the recent 'Filton 4' convictions, the defendants were not prevented from explaining the reasons for their action and emphasised the need for direct action to save lives. The da3m support group posted footage of Iain Evans, Hisham Alkhamesi, Hana Yun-Stevens and Frank Sherman as they walked out of the courtroom to freedom. With a 'no conviction' decision, however, the Starmer regime may well apply to re-try them:

Open

da3m.support and europe.palestine.network
Original audio

View profile



View more on Instagram

22,084 likes
da3m.support

Moog 4 you make us proud!

Ian, Hisham, Frank and Juno walk free from court after the jury failed to convict them.

They climbed onto the roof of Moog in August 2025, wearing T-shirts with the names of Palestinians killed in Israeli airstrikes, and dismantled the factory.

In their closing speech, Frank said: "I disarmed this criminal company. I will always in my heart know that using care and intention to disarm the factory is not criminal".

Video from @xenogothic
View all 574 comments

Add a comment...

Featured image via Instagram

Tags: Labour Party UK

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

STATEMENTS & PRESS RELEASES

MOOG 4 FACE TRIAL FOR DIRECT ACTION AGAINST UK BASED ARM OF ISRAEL'S GENOCIDE MACHINE

June 4, 2026

Post Share Share

Activism Detention Law Genocide



RELEVANT POSTS

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

Birmingham — CAGE condemns the prosecution of the Moog 4, whose trial opens today at Birmingham Crown Court. In August 2025, four activists broke into the Wolverhampton factory of Moog Aircraft Group and allegedly caused damage to its facilities. It is understood that Moog had been shipping military components from Britain to Israel to maintain the aircraft used to train Israeli fighter pilots, whose F-16s and F-35s have been central to the sustained bombardment of Gaza.

Cargo documents obtained by Declassified UK and The Ditch confirm that Moog dispatched at least ten shipments from Wolverhampton to Israel's Hatzerim airbase, supplying components for the M-346 Lavi trainer aircraft. The M-346 prepares Israeli pilots to fly F-16 and F-35 jets - both central to the sustained bombardment of Gaza. Moog designed the aircraft's flight control system and provided its maintenance. The UK government's own Foreign Office concluded the M-346 "facilitates the development of an offensive capability." It licensed the shipments regardless.

When Moog moved to obscure its supply routes following the August 2025 action, it was caught trucking military components to Liege airport in Belgium. Belgian authorities seized the shipments and opened a criminal investigation. Moog faces accountability abroad for conduct the UK government has actively shielded at home.

STATEMENTS & PRESS RELEASES

US designation of Palestine Action exposes a global war on Palestine solidarity

August 28, 2026

STATEMENTS & PRESS RELEASES

Unanimous acquittal of Tony Greenstein affirms supporting Palestinian liberation is not a crime

August 21, 2026

STATEMENTS & PRESS RELEASES

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

The prosecution of the Moog4 - two years into a genocide their government continues to service - must be viewed in the broader context of western governments protecting the interests of an arms company over Palestinian lives and their own citizens.

Anas Mustapha, Head of Public Advocacy at CAGE, said:

"The defendants have spent six months on remand before their trial has even begun. The company whose factory they targeted continues to supply the apparatus slaughtering Palestinians in Gaza and faces a blind eye from British authorities. This prosecution amounts to the British state criminalising any meaningful challenge to its own role in genocide."

▪ Trial of the Moog4 begins at Birmingham Crown Court on 4 June 2026.

▪ The four face charges of criminal damage to property valued over £5,000 and conspiracy to destroy or damage property, following direct action at Moog Aircraft Group's Wolverhampton facility on 26 August 2025.

▪ Cargo documents obtained by Declassified UK and The Ditch confirm at least ten shipments from Moog's Wolverhampton site to Israel's Hatzerim airbase since December 2024, destined for the M-346 Lavi trainer aircraft programme operated by Elbit Systems.

▪ Moog designed the flight control system for the M-346 Lavi and provides

Barclays 5 avoid terrorism sentencing, but judge's reasoning leaves door open

August 21, 2026

STATEMENTS & PRESS RELEASES

The UAE mercenary operation against Anas Altikriti follows the Israeli apartheid playbook

August 20, 2026

ongoing maintenance - the aircraft trains Israeli pilots to fly F-16 and F-35 jets used in the bombing of Gaza.

▪ The UK government's own Foreign Office assessed that the M-346 "facilitates the development of an offensive capability" and continued to license shipments regardless.

▪ Moog subsequently rerouted shipments through Belgium, where authorities have seized the components and opened a criminal investigation - Belgium maintains a full arms embargo on Israel.

ORIGINAL REPORTING ON EVERYTHING THAT MATTERS IN YOUR INBOX.

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041







Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

Pro-Palestine protesters face retrial over damage



Prosecutors confirmed they intend to re-try four people who deny acting unlawfully in connection with damage caused at Moog Wolverhampton Ltd

3 July 2026

Four pro-Palestine protesters accused of causing criminal damage to an aerospace factory are to face a retrial next year.

Iain Evans, 33, Hisham Alkhamesi, 23, Hana Yun-Stevens, 24, and Frank Sherman, 23, also known as Bea Sherman, all deny acting unlawfully when damage was caused to Moog Wolverhampton Ltd in August last year.

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

Prosecutors allege the defendants, who believed the business was involved in the supply chain to Israel, had no lawful excuse to act as they did.

Last month, a jury failed to reach a verdict and earlier on Friday, judge Mr Justice Wall said a trial would start on 8 March "or very shortly thereafter".

Evans, of Saltaire in Shipley, West Yorkshire, Alkhamesi, of Burbage, near Hinckley, Leicestershire, Yun-Stevens, from south-west London, and Sherman, of Ditchling, East Sussex, have pleaded not guilty to a single count of causing criminal damage to property.

The defendants, who spoke only to confirm their identities, all appeared at Birmingham Crown Court via video-link, to hear prosecutor Rupert Jones apply for the case to be re-tried.

The Crown alleges the four caused criminal damage at the factory in the Pendeford area of Wolverhampton by cutting away sections of roofing using power tools and smashing hundreds of solar panels.

Setting a date for a re-trial expected to last for about five days at a court venue which has yet to be finalised, the High Court judge said: "In the case of each of the four defendants I will extend bail on the same terms as they have been up until today."

The jury at Birmingham Crown Court failed to reach any verdicts on the defendants in June.

Get in touch

Tell us which stories we should cover in Wolverhampton

Contact form

*Follow BBC Wolverhampton & Black Country on **BBC Sounds**, **Facebook**, **X** and **Instagram**.*

Related topics

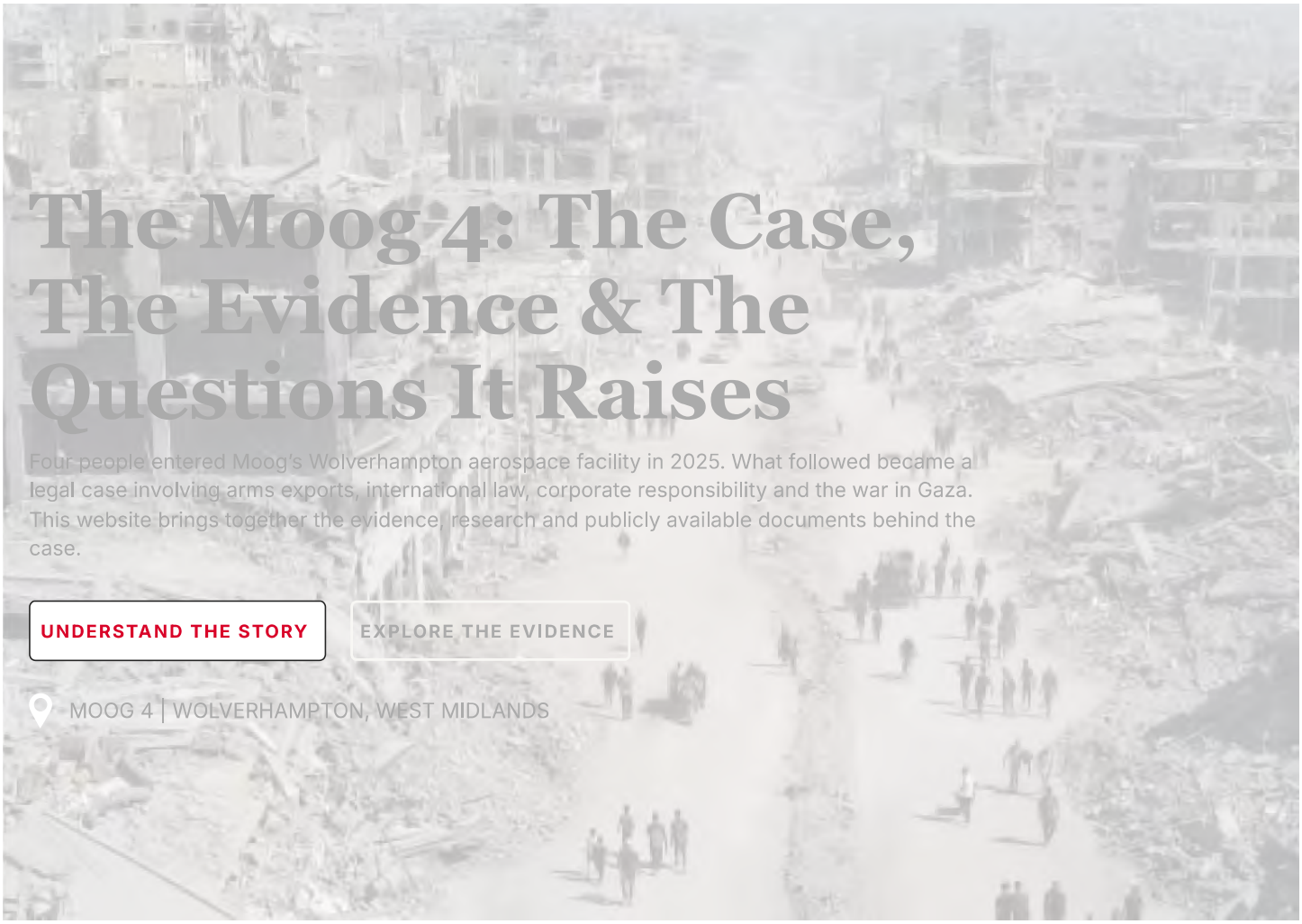
Shipley **Burbage** **Wolverhampton** **Ditchling**

Related internet links

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

THE MOOG 4 FILES

Research • Understand • Decide



The Moog 4: The Case, The Evidence & The Questions It Raises

Four people entered Moog's Wolverhampton aerospace facility in 2025. What followed became a legal case involving arms exports, international law, corporate responsibility and the war in Gaza. This website brings together the evidence, research and publicly available documents behind the case.

UNDERSTAND THE STORY EXPLORE THE EVIDENCE

MOOG 4 | WOLVERHAMPTON, WEST MIDLANDS

Whether you're new to the Moog 4 case or looking to explore the research in more detail, these four starting points will help you understand the people, the company, what happened at Wolverhampton and why the case matters.

Who is Moog?

Understand Moog's aerospace and defence operations, including its Wolverhampton facility.

Who are the Moog 4?

Meet the four people at the centre of the case and understand what led to the action.

What Happened?

A clear overview of the events at Moog Wolverhampton and what happened afterwards.

Why Does It Matter?

Explore the wider questions around military exports, international law and corporate responsibility.

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041



Why Wolverhampton?

Moog's Wolverhampton site sits at the centre of this story. The facility forms part of Moog's global aerospace and defence operations, connecting a site in the West Midlands to international military supply chains.

The events involving the Moog 4 took place here, making Wolverhampton an important part of a much wider story.

01.
Moog Wolverhampton
Military aerospace components are produced at the Wolverhampton facility.

↓

02.
Questions Around Gaza
Attention turns to military supply chains, aircraft programmes and UK arms exports.

↓

03.
The Action
Four people enter the Moog Wolverhampton site.

↓

04.
Arrests & Prosecution
The action leads to arrests, charges and court proceedings.

↓

05.
The Evidence
Documents, research and public records are gathered to examine the wider issues.

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041



THE RESEARCH

Whether you're new to the Moog 4 case or looking to explore the research in more detail, these four starting points will help you understand the people, the company, what happened at Wolverhampton and why the case matters.

Court Documents Explore material relating to the legal case.	**Moog & Military Aircraft** Understand Moog's role within the aerospace and defence industry.	**F-35 Research** Explore research connected with the F-35 programme.
M-346 Research Read about the M-346 aircraft and related supply chains.	**Arms Export Records** Explore official records and export information.	**Freedom of Information** Read material obtained through FOI requests.

The research examines Moog's military aircraft business, the components produced within its supply chain and the wider questions surrounding aircraft used by the Israeli military.



Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041



GO DEEPER INTO THE RESEARCH

Moog Wolverhampton and the F-35

Explore the links between Moog's Wolverhampton operation, the F-35 programme and the wider military aircraft supply chain.

Understanding the M-346 Supply Chain

Follow the supply chain behind the M-346 aircraft and examine the role of components connected to Moog's Wolverhampton facility.

USB Memory Stick Contents

Browse the documents, files and supporting material contained on the USB memory stick linked to the Moog 4 case.

The Moog 4 website brings together research, documents and publicly available information relating to Moog, the Wolverhampton facility, the Moog 4 case and the wider issues surrounding military exports and international law.

It is designed to make complex information easier to find, understand and explore.

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041



THE EVIDENCE IS HERE

© 2026 By The Moog4 Files

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

Moog's Role In Gaza

Moog's Wolverhampton operation forms part of international military aircraft supply chains that connect the West Midlands to aircraft used by the Israeli Air Force. This page brings together research, shipping records, government documents and other publicly available evidence examining Moog's involvement in the F-35 and M-346 programmes, and the wider questions this raises around UK arms exports, corporate responsibility and the conflict in Gaza.



The Conflict In Gaza

The Gaza war that has been ongoing since 2023 has been accompanied by unprecedented international scrutiny of the conduct of the parties to the conflict and the role of states and companies supplying military equipment. A wide range of United Nations bodies, international courts, human rights organisations and humanitarian agencies have raised concerns regarding compliance with international humanitarian law, the protection of civilians and the responsibilities of governments and businesses involved in military supply chains.

According to The Economist magazine, by May 2025, the overall death toll for the Gaza conflict had exceeded 75,000, the majority of them civilians. "The reported death toll is currently about 53,000 people ... (but due to under-reporting) ... the number of dead is not 53,000, but somewhere between 77 and 110,000".

Numerous international organisations have published reports alleging serious violations of international law. Amnesty International concluded in December 2024 that Israel was committing genocide against Palestinians in Gaza, while Human Rights Watch has accused Israel of war crimes and crimes against humanity, including the use of starvation as a method of warfare. Other organisations, including Médecins Sans Frontières (Doctors Without Borders), Oxfam and a number of UN agencies, have repeatedly warned of catastrophic humanitarian conditions and alleged widespread violations of international humanitarian law.

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

The Timeline

Oct-Dec 2023

Following the Hamas-led attacks of 7 October 2023, Israel began an intensive aerial and ground campaign in Gaza. By 10 December, the Israeli military said it had struck more than 22,000 targets in the Gaza Strip. Satellite analysis by the United Nations Satellite Centre found that, by 26 November, approximately 18 per cent of all structures in Gaza had already been damaged: 10,049 buildings were identified as destroyed, 8,243 severely damaged and 19,087 moderately damaged. By 7 January 2024, the number of damaged structures had risen to more than 69,000. The scale and speed of the destruction during the first three months of the war led researchers to describe the bombardment as among the most intense of the twenty-first century.

Jan 2024

The International Court of Justice (ICJ), at proceedings brought by South Africa concludes there is a plausible risk of irreparable harm to rights protected by the Genocide Convention.
Orders a series of legally binding provisional measures requiring Israel to prevent war crimes, preserve evidence and facilitate humanitarian assistance. The Court subsequently issued additional provisional measures during 2024 as humanitarian conditions in Gaza deteriorated. The ICJ has not yet reached a final determination on whether genocide has occurred. Proceedings remain ongoing.

Sep 2024

On 2 September 2024, the UK Government announced the suspension of 29 existing export licences for military and dual-use equipment assessed as being for use in Israeli military operations in Gaza. The decision followed a review in which the Foreign Secretary concluded that there was a "clear risk" that certain UK exports might be used to commit or facilitate serious violations of international humanitarian law; the subsequent High Court judgment recorded that this conclusion was "not finely balanced" and was considered by the Foreign Secretary to be "the only conclusion available to him". The suspension was not a general arms embargo. Most licences remained unaffected, including parts for the fast jets used to train Israel's fighter pilots despite the Foreign Office concluding that these "facilitated offensive capability", and exports of UK-made components into the multinational F-35 programme were specifically exempted where their ultimate destination could not be identified, although F-35 components exported directly to Israel were, in principle, excluded from the exemption. The Government argued that suspending all UK exports into the F-35 programme would disrupt the global supply chain and have a "profound impact on international peace and security".

Nov 2024

In November 2024, the International Criminal Court (ICC) issued arrest warrants for Israeli Prime Minister Benjamin Netanyahu and former Defence Minister Yoav Gallant on allegations of war crimes and crimes against humanity. The Court stated that there were reasonable grounds to believe that the suspects bore criminal responsibility for offences including intentionally directing attacks against civilians, starvation of civilians as a method of warfare and persecution. Arrest warrants were also issued in relation to senior Hamas leaders in connection with the 7 October 2023 attacks.

Jun 2025

The F-35 exemption was challenged in the High Court by the Palestinian human rights organisation Al-Haq. In June 2025, the Divisional Court dismissed the judicial review and upheld the Government's decision. The Court accepted that the Government had concluded that Israel was not committed to compliance with international humanitarian law and that there was a clear risk that UK military equipment exported to Israel might be used to commit or facilitate serious violations of IHL in Gaza. It also accepted that some UK-manufactured F-35 components supplied through the global programme would ultimately reach Israel. However, the Court held that the Government had faced what it described as the "blunt choice" of accepting the F-35 exemption or withdrawing UK components from the entire F-35 programme, with the defence and diplomatic consequences that would follow. Questions involving international relations, national security and the UK's participation in the F-35 programme were principally matters for the democratically accountable executive rather than the domestic courts, and the Government's decision was not irrational.

READ EVIDENCE SUBMITTED TO THE HIGH COURT OF F-35 USE IN GAZA

Watch the Save the Children video about the F-35 aircraft and its use in Gaza

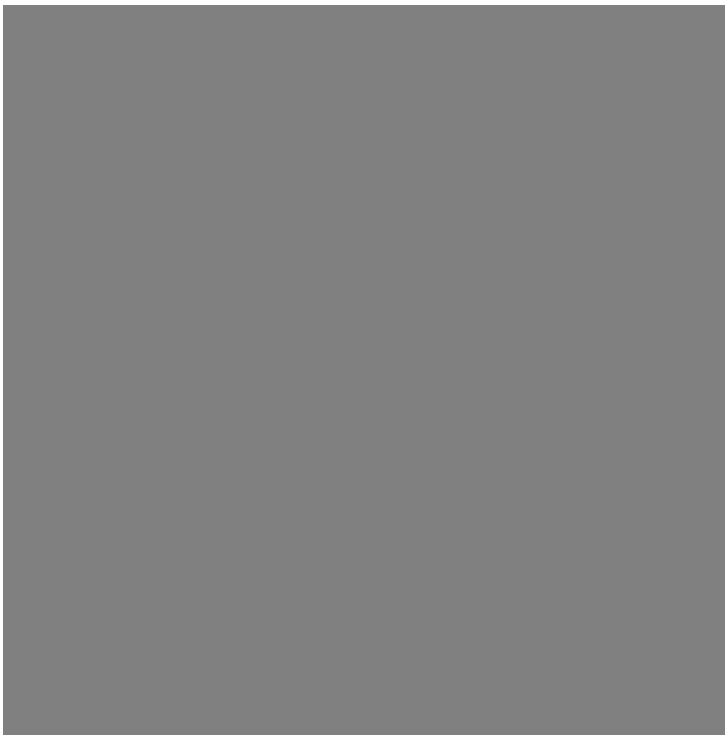
Jul 2025

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

On 2 July 2025, the United Nations Special Rapporteur on the situation of human rights in the Palestinian territories occupied since 1967, Francesca Albanese, published "From Economy of Occupation to Economy of Genocide". The report examined the role of international corporations in supporting Israel's military and security infrastructure and identified a number of defence and technology companies, including Lockheed Martin, Leonardo and Elbit Systems. It called on states and businesses to review their responsibilities under international law and to cease activities that could contribute to alleged violations. Campaign groups opposing Moog's activities cited the report as evidence that companies throughout the international defence supply chain should reassess their commercial relationships with Israel.

Aug 2025

Growing concern also extended into the business community. On 21 August 2025, more than 700 British business leaders, founders and professionals signed an open letter organised by Business Leaders for Peace calling on the UK Government to take further steps to prevent atrocities in Gaza, suspend arms transfers where there was a clear risk of violations of international law, and ensure compliance with the United Kingdom's obligations under international humanitarian law. The initiative reflected increasing engagement by business leaders in debates surrounding corporate responsibility, defence supply chains and the humanitarian consequences of the conflict.



According to AirWars, The Civilian Harm Watchdog which logs civilian casualties in all conflicts (not just Gaza), since the start of the current conflict in Gaza there have been over 15,000 civilian casualties, including over 9,000 fatalities, purely from airstrikes from Israeli Defence Force aircraft (not including drones or other UAVs). Moreover, civilian casualties and airstrikes on civilian infrastructure have continued throughout 2024 and 2025.

That suggests that air strikes by Israeli Air Force fighters are responsible over 10% of the direct casualties of the conflict, but of course a significant proportion of the remaining casualties are a result of the extensive damage to and deterioration in the overall civilian infrastructure in Gaza, many of which are the direct result of air strikes, as documented in the following table.

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

Moog Wolverhampton and Israel's F-35 programme

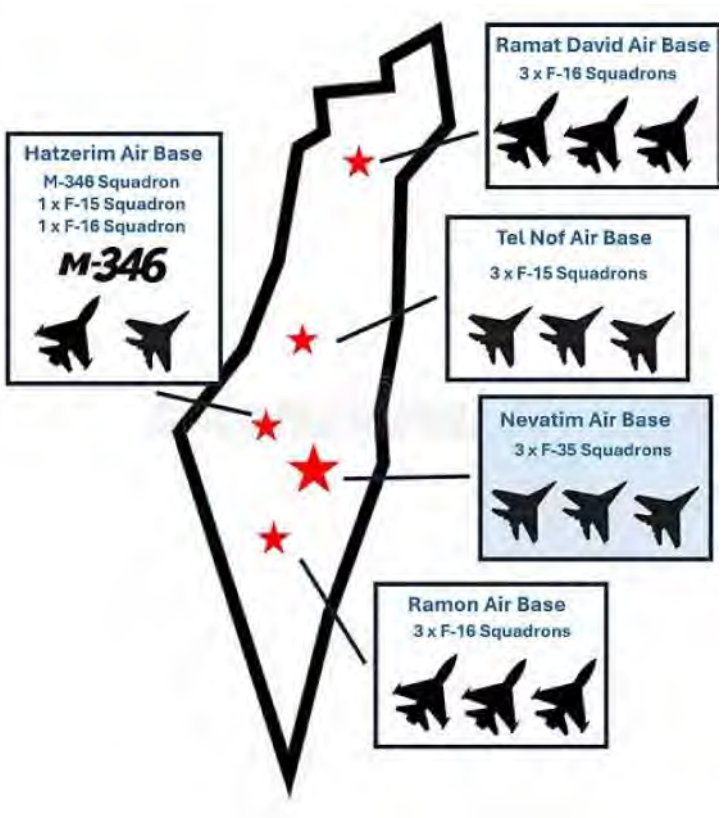
In November 2019, Moog announced that it had been awarded contracts for the Primary Flight Control Actuation System, the Leading Edge Flap Drive System and the Wingfold Actuation System on the F-35 fighter.

The initial three year contract was worth over $400 million, approximately $135 million per annum, with production split between Moog's Wolverhampton and Elma, NY facilities.

In November 2024, Campaign Against Arms Trade cited Moog Wolverhampton Limited as one of a number of UK arms companies that was involved in the supply chain for Israel's F-35 fighter jet programme.

The F-35 had been implicated in a number of airstrikes carried out in Gaza resulting in civilian casualties, in particular the Al-Mawasi airstrike in July 2024, which resulted in over 80 civilian casualties, of whom between 19-40 were killed.

Following the al-Mawasi attack, there was increasing pressure from humanitarian organisations including Save the Children for the UK to ban all F-35 exports to Israel.



Israeli Air Force air bases and principal fighter jet squadrons in Israel

However, when the UK suspended 29 out of almost 300 arms export licences to Israel in September 2024, it exempted the F-35 programme from the suspensions given that the bulk of UK F-35 exports to Israel were via the United States, with the UK government arguing that tracking such exports would be impossible and restricting such exports would damage the UK-US military alliance.

Shipment data from Moog as well as data obtained via Freedom of Information requests indicated that Moog Wolverhampton made more than 640 shipments of F-35 components per annum in 2025.

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041



Israel has been operating the Leonardo M-346 fast jet trainer since 2013, and its "Flying Tiger" squadron currently operates 30 aircraft at Hatzerim Airbase, the largest fleet of M-346 fast jets in the world. According to company promotional literature, Moog Wolverhampton designed the complete Primary Flight Control Actuation system for this aircraft and is the original equipment manufacturer (OEM) supplier for production aircraft.

Unlike the F-35, which has received extensive public attention because of its use in combat operations, the M-346 used for the final stage of fighter jet pilot training before Israeli Air Force pilots transition to frontline F-15, F-16 and F-35 fighter aircraft. In July 2025, Declassified UK reported that components manufactured at Moog's Wolverhampton facility had been shipped to Hatzerim Airbase, where Israel's M-346 fleet is based. Campaigners argue that maintaining the pilot training pipeline is an essential part of sustaining Israel's air campaign and should therefore be considered alongside the supply of combat aircraft components.


FedEx

December 18, 2025

Dear Customer,

The following is the proof-of-delivery for tracking number: 466367022913

Delivery Information:

Status:	Delivered	Delivered To:	Receptionist/Front Desk
Signed for by:	K.DELIVERY ORDER DSV AIR A	Delivery Location:	M346 LAVI PROGRAM
Service type:	FedEx International Priority		ISRAELI MINISTRY OF DEFENCE
Special Handling:	Deliver Weekday		TEL AVIV, 61000
		Delivery date:	Jul 24, 2025 23:12

Shipping Information:

Tracking number:	466367022913	Ship Date:	Jul 16, 2025
		Weight:	52.69 LB/23.9 KG

Recipient:
LAVIE - MRB, ELBIT SYSTEMS LTD
M346 LAVI PROGRAM
ISRAELI MINISTRY OF DEFENCE
3 Hakirya
TEL AVIV, IL, 61000

Shipper:
DEBBIE ALLEN, MOOG AIRCRAFT GROUP
VALIANT WAY
WOLVERHAMPTON, GB, WV9 5GB

Reference 1S0008550 (Packing List 80065580)

FedEx shipping document of M-346 parts from Moog Wolverhampton to Israel's Ministry of Defence / Elbit Systems Limited

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041



Sir Chris Bryant, Minister of Trade, misled Parliament regarding the training timelines for Israeli pilots

Subsequent reporting by Declassified UK identified further shipments from Wolverhampton to the Israeli Ministry of Defence and questioned ministerial statements that remaining UK arms exports following the September 2024 licence suspensions would not directly support Israeli military operations in Gaza. The reporting argued that continued exports of M-346 components demonstrated that military support extended beyond the government's acknowledged exemption for the multinational F-35 programme. In April 2026, Declassified UK also challenged evidence given to Parliament by Trade Minister Chris Bryant, arguing that official statements had understated the role of UK-manufactured trainer aircraft components in supporting Israeli fighter pilot training. The Department for Business and Trade and the Foreign, Commonwealth and Development Office were asked to clarify the government's position.

Sir Chris Bryant, Minister of Trade, misled Parliament regarding the training timelines for Israeli pilots
Campaign organisations, including Campaign Against Arms Trade (CAAT), contend that the distinction between combat aircraft and trainer aircraft is artificial in the context of an ongoing armed conflict. They argue that supplying the aircraft used to train F-35 and F-16 pilots contributes directly to Israel's operational capability and undermines the rationale advanced by the UK Government for maintaining selected export licences after September 2024. These concerns have become a central focus of campaigning directed at Moog's UK operations and formed part of the background to direct-action protests at the Wolverhampton site.

Other Moog businesses have also shipped extensive quantities of military equipment to Israel since the start of the genocide.

Moog US has been shipping spare replacement parts for F-15 and F-16 fighter jets from their factories in Elma, NY and Torrance, California. According to investigative newspaper Private Eye, Moog Inc. was one of a number of US arms suppliers using East Midlands Airport as a transit hub for shipments of F-15 and F-16 spare parts from the US to Israel, with peaks in such shipments coinciding with peaks in Israeli air strikes against Gaza, Lebanon and Iran. The article went on to note that East Midlands Airport is majority-owned by a consortium of Greater Manchester public authorities, and therefore ultimately under the authority of the Mayor of Greater Manchester Andy Burnham.

Other Moog businesses involved in the supply of military equipment to Israel include Moog's Power and Data Division in Blacksburg, Virginia, which has been shipping electrical connectors and resolvers for use in military aircraft, drones and armoured vehicles and Moog's Protokraft business in Johnson City, Tennessee, which has been shipping electro-optical components for military aircraft and drones.

The Economist, May 2025, "The death toll in Gaza is probably even worse than you think"

International Court of Justice, Jan 2024, "Application of the Convention on the Prevention and Punishment of the Crime of Genocide in the Gaza Strip (South Africa v. Israel)"

UK Government, Sep 2024, "UK suspends around 30 arms export licences to Israel for use in Gaza over International Humanitarian Law concerns"

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041



Photo: Disarm Bristol

Bristol activists blockade Elbit contractors

Freedom News | 9 July 2026

Workers at logistics provider DSV were "very supportive", say organisers

- *Scott Harris* -

Disarm Bristol says a group of almost 40 protesters this morning blockaded the gates of DSV Road, a logistics and transport company contracted by Israeli weapons giant Elbit Systems.

Protesters held banners saying "DSV Drop Elbit" and "Disarm Bristol Now", and prevented truck deliveries to the site for 3 hours.

According to the group, "after initial confusion and confrontation, workers at the site were very supportive" of the action once it was explained to them.

Today's blockade follows a string of actions against DSV in multiple countries. The company in 2024 replaced a Switzerland-based logistics giant, which cut ties with Elbit as a result of continued pressure from direct action groups.

"You can crack down on peaceful protest in order to protect the arms trade, but people will always continue resisting, because it is right", said a participant.

Subscribe to Freedom anarchist journal, sustain radical publishing and support independent media.

SUPPORT FREEDOM

Share

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

The Action

On 26 August 2025, four protesters entered Moog's Wolverhampton facility in an action intended to disrupt the supply of military aircraft components to Israel. This page traces the planning, the events of that morning and the legal and commercial aftermath that followed.

Before 26 August 2026

According to evidence heard during the trial, the action at Moog Aircraft Group's Wolverhampton facility was the culmination of several months of research by the defendants into the company's alleged role in supplying components for military aircraft used by Israel. The defendants told the jury that they had become concerned by publicly available reporting linking Moog to the F-35 and Leonardo M-346 programmes and had concluded that disrupting production could interrupt the supply of aircraft components destined for the Israeli Air Force.

They said they had deliberately selected a factory involved in the aerospace supply chain rather than targeting individuals, believing that a temporary interruption to production could have a disproportionate effect because of the industry's "just-in-time" manufacturing model. Iain Evans, a former aerospace industry employee who had worked for a company that supplied parts to Moog, explained that even relatively short production delays could have significant downstream effects on deliveries due to the "Just in Time" supply chain that they operated.

The group carried out reconnaissance of the Wolverhampton site before the action and selected the August Bank Holiday weekend because the factory was expected to be closed, thereby minimising the risk of encountering workers. They equipped themselves with climbing equipment, tents, food, battery-powered tools, and wore T-shirts displaying photographs of four Palestinians killed during the conflict in Gaza - journalist Hossam Shabat, writer Refaat Alareer, surgeon Adnan al-Bursh and 17-year-old amputee basketball player Raghad Al-Jabri.

One defendant, Hisham Alkhamesi, used money left to him by his late grandmother to contribute to the equipment used in the action. They also stored all of their research on Moog and its role in the Gaza genocide on USB memory sticks that they carried with them so that they would be found on them when arrested.

During the trial, the defendants said the purpose of the action was to disrupt exports for as long as possible and that avoiding any risk of harm to other people had been a central part of the planning.

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

At 3.50 a.m. on 26 August 2025, the four defendants drove a van through the factory's security gates before entering the site and climbing onto the roof. Prosecutors alleged that the group then used battery-powered tools to cut, drill and damage roof structures, skylights and other property. A banner reading "Free Palestine" was suspended from the roof and videos of the protesters on the roof were uploaded to social media sites explaining that they were taking action against Moog in order to disrupt the supply of parts for F-35 fighter jets and M-346 fighter jet trainers to Israel.

Nobody was inside the factory at the time of the protest but security officers called the police and after approximately 10 minutes, Staffordshire Police had arrived at the site under Officer in Command Martin Ottey. A police helicopter was also called and subsequently a specialist rooftop protest removal team arrived, also from Staffordshire Police.

The occupation continued until approximately 10am by which time armed police and specialist officers had secured the site and removed and arrested the four protesters. CCTV footage, helicopter imagery and police bodycam footage documenting the action formed a substantial part of the prosecution case.

During the trial, the defendants maintained that the operation had been carefully planned to avoid injury to employees or emergency responders and that their objective had been to halt or delay the export of aircraft components which they believed contributed to Israeli military operations in Gaza. The prosecution accepted that the defendants had not intended to harm individuals but argued that their political motivation did not provide a lawful excuse for deliberately causing extensive criminal damage to commercial premises.





Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041





The four defendants were arrested at the scene and subsequently charged with criminal damage exceeding £5,000 and conspiracy to commit criminal damage. Following their first appearance before magistrates, they were remanded into custody pending further proceedings.

In the weeks following the protest, Moog sought a High Court injunction against "persons unknown" in relation to protest activity at a number of its UK sites. The injunction prohibited trespass, obstruction of access and interference with the company's operations.

The injunction proceedings also revealed that Moog had been in regular contact with Staffordshire Police before the protest. According to Moog's own evidence, the contact began after the company was approached by Declassified UK about its shipments of aircraft components to Israel. From 1 July 2025, police visited the Wolverhampton site on several occasions, reviewed the journalist's correspondence, discussed the risk of protest and site security, and advised Moog on additional control measures. Uniformed police officers subsequently carried out regular patrols of the site in the weeks before the 26 August action.

Court documents filed by Moog's General Counsel also referred to the Crown Prosecution Service's intention to seek a finding that the offences had a "terrorism connection" for sentencing purposes under section 69 of the Sentencing Act 2020 if convictions were secured. Although no terrorism offences were charged, this was one of the first publicly reported indications that prosecutors intended to pursue the terrorism connection provisions in relation to a protest against UK military exports to Israel.

The case was later transferred to the Old Bailey because of its alleged seriousness, with preliminary hearings taking place before Mrs Justice Cheema-Grubb, one of the High Court Judges who sits on the Terrorism List. The defendants remained in custody for approximately six months before being granted conditional bail ahead of their trial, which was listed to take place in Birmingham Crown Court before Mr Justice Wall, also on the Terrorism List of High Court Judges, on 4 June 2026.

Evidence emerging after the protest suggested that the action had a measurable impact on Moog's exports to Israel, although not Moog Wolverhampton's broader financial results for 2025. Shipping records analysed by journalists and campaigners indicate that military aircraft component shipments from the Wolverhampton facility to Israel ceased for more than three weeks following the action, with exports not resuming until 19 September 2025. Subsequent shipment data also suggested that monthly export volumes remained substantially below pre-action levels for several months, with the number of consignments to Israel reportedly falling by around half. Meanwhile Moog Wolverhampton's revenues in 2025 grew by more than 35% compared to 2024, with profits more than trebling.

Campaigners argued that this demonstrated the practical effect of disrupting a "just-in-time" aerospace supply chain, while Moog has not publicly commented on the reasons for any changes in shipping volumes.

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

Moog M-346 shipments from Wolverhampton to Israel interrupted for 3 weeks after 26 August 2025



THE MOOG 4 FILES
— Research · Documented · Truth —

© 2026 By The Moog4 Files

The action at Wolverhampton became the beginning of a much wider legal case, raising questions about protest, arms exports and the use of terrorism-related powers.

Continue the story and explore the charges, trials and evidence surrounding the Moog 4.

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

DECLASSIFIED UK

INVESTIGATIONS:

US ARMS FIRM SECURES BAN ON PALESTINE PROTESTS IN BRITAIN

Court documents reveal aerospace firm Moog has obtained an injunction against protesters in Britain and even consulted the police about Declassified.

JOHN MCEVOY

23 OCTOBER 2025



A Moog system with missile launcher on display at an airshow. (Photo: Alexander Bogatyrev / Alamy)

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

parts and has links to Israel's arms trade, applied for an injunction in September to prevent protests at its UK sites.

The application, which was granted by the High Court, sought to stop "persons unknown" who "for the purpose of protest enter occupy or remain on" the firm's facilities across Britain.

Moog returned to court earlier this month and obtained a wider injunction to cover interference with "access to or egress from that land and premises".

This means protesters are barred from blocking traffic around entrances and exits and face risk of arrest on public land adjacent to the company's sites.

Moog requested the injunction after its factory in Wolverhampton was targeted by a direct-action group named "Palestinian Martyrs for Justice".

In August, four members of that group crashed through the factory's gates and smashed its rooftop, allegedly causing over £1m in damage.

The activists accused Moog 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 exposed how Moog sent at least ten shipments of trainer aircraft parts from Wolverhampton to an Elbit Systems site in Israel between December 2024 and July 2025.

Moog did not respond to our requests for comment at the time but *Declassified* appears no fewer than 44 times in the

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

development of so-called 'persons unknown injunctions' by the British courts, and their impact on peaceful protest rights".

Its UK law and human rights director Tom Southerden told *Declassified*: "Such injunctions are routinely issued for companies, landowners and public authorities without any opposition, anyone putting the counter arguments or anyone testing the evidence that the applicants seek to rely on.

"They bring with them hugely inflated punishments for acts of protest, as breaching them constitutes contempt of court.

"Potentially even worse are the financial risks faced by anyone caught up in them, who face the prospect of having to pay the legal costs of major multinational corporations, leading to people losing their homes and being made bankrupt.

"These injunctions are created solely to intimidate people into not protesting and urgently need to be curtailed".

RELATED



ISRAELI FIGHTER PILOTS TRAINING WITH UK EQUIPMENT

READ MORE

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

injunction because *Declassified* has published investigations into Moog's links to the Israeli arms industry.

"Prior to its proscription, there was a clear pattern of UK-based companies being targeted by protests from Palestine Action and other pro-Palestinian organisations, particularly after being named in Declassified", the witness statement says.

It goes on to note how protests took place across several BAE Systems sites in December 2023, weeks after *Declassified* had published an article "alleging that BAE manufactured key parts for the F-35 fighter jets being used to support strikes on Gaza".

Moog curiously omits how it is common knowledge that BAE Systems produces key parts for F-35s because it is stated on its own website.

Moog also attempts to construct a timeline between a *Declassified* report on 8 May 2025 and Elbit-owned Instro Precision being targeted by Palestine Action later that month.

"Following publication of the article, there was a... Palestine Action attack aimed at Instro Precision on 29 May 2025. In this instance, Palestine Action targeted the registered London address of Discovery Park", the witness statement reads.

But this was far from the first time that activists had protested Instro Precision, with trade unions demonstrating at the factory in October 2023 and Palestine Action targeting the company in June 2024.

Moog did not approach *Declassified* for comment before issuing its request for an injunction, thereby offering no

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

that *Declassified*'s approaches were shared with Staffordshire police before our article had even been published.

"On 4 July 2025, a police officer from South Staffordshire... visited the site, reviewed the email sent from Mr McEvoy at Declassified, discussed safety at the Wolverhampton Site in the event of a protest", the document notes.

'Specific allegations'

In its witness statement, Moog does not attempt to refute *Declassified*'s reporting, saying it would not be company policy "to respond to any of the specific allegations made... in the Article".

The firm nonetheless says it does not "accept the characterisation of Moog's business activities in the Article and, in particular, the link it attempts to make with the situation in Gaza".

It is unclear on what specific basis Moog is trying to distance itself from "the situation in Gaza".

But cargo documents show, since December 2024, the company has exported M-346 Lavi components to an Elbit Systems factory in Israel as well as to the country's ministry of defence.

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

Trade minister Chris Bryant attempted to justify the export of these parts to Israel last month, saying: "The assessment is that the training of an aircraft pilot on such equipment would

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

A US air force report also recently estimated that it could take just 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.

RELATED



UK AEROSPACE FIRM SUPPLYING ISRAEL'S DEFENCE MINISTRY

READ MORE

Damage

Moog's witness statement also details the financial impact of the direct-action campaign at its Wolverhampton factory.

The company says 95% of the solar panels on the roof were "destroyed at an estimated approximate value of £700,000".

The entire system was therefore "inoperable, meaning that Moog will be liable for the loss of energy generation and will need to procure electricity off the grid".

In addition, all of the windows at roof-level were smashed, and

become fully operational again", with employees "forced to work from home as Moog works through the cleanup process".

The direct-action campaign also had knock-on effects for Moog's contractual arrangements.

The company said it had "issues with meeting supply contracts on time, including the supply of components for ultimate use by the MoD".

It added that "there is potential reputational damage for Moog if customers conclude that Moog's ability to supply components on time... could be compromised by its susceptibility to disruption caused by unlawful protest activity".

Ultimately, Moog estimated that the total financial loss caused by the incident to be "between circa £1,250,000 to £2,000,000".

The firm reported a gross profit of almost $1bn last year.

TAGGED: Israel US

ABOUT THE AUTHOR

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

DECLASSIFIED UK

INVESTIGATIONS:

John McEvoy is Chief Reporter for Declassified UK. John is an historian and filmmaker whose work focuses on British foreign policy and Latin America. His PhD was on Britain's Secret Wars in Colombia between 1948 and 2009, and he is currently working on a documentary about Britain's role in the rise of Augusto Pinochet.

VIEW MORE ARTICLES

YOUR DONATION FUNDS OUR INVESTIGATION

DONATE TODAY

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

Subscribe today, just £1 for your firs

KentOnline UK regional news website of the year (/)

News(/news/) Subscribe(/subscribe/) Digital Editions(https://digital.imnews.app) Sport(/sport/) Submit a Story(/news/submit-a-story/) Court(/news/court/)
Premium (https://premium.kentonline.co.uk)

Pro-Palestine protesters block entrance to Instro Precision factory at Sandwich Discovery Park again

Read all comments | 6

Cara Simmonds (/authors/cara-simmonds) csimmonds@thekmgroup.co.uk (mailto:csimmonds@thekmgroup.co.uk)

Published: 09:40, 12 February 2026
Updated: 14:20, 12 February 2026

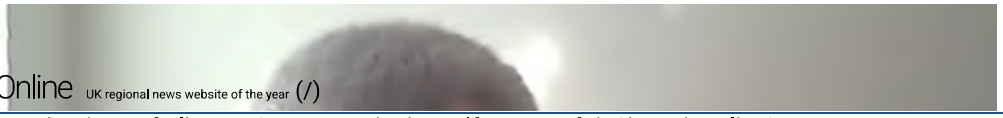
Add as a preferred source on Google
(https://google.com/preferences/source?q=https://www.kentonline.co.uk)
(https://api.whatsapp.com/send?text=Pro-Palestine protesters block entrance to Instro Precision factory at Sandwich Discovery Park again - https://www.kentonline.co.uk/thanet/news/activists-blockade-factory-entrance-in-protest-rally-336357/) |
| | | |

Pro-Palestine activists have blocked a factory entrance today during a second protest in three weeks.

The demonstrators, part of a new grassroots organisation, Arms Embargo From Below, have prevented access to the Instro Precision factory at Sandwich Discovery Park.

Local businesses in Kent give their opinion on AI use

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041



Instro is a subsidiary of Elbit Systems UK, which itself is part of the broader Elbit Systems Group – one of the largest arms manufacturers in Israel.

The protesters say they have decided to make a stand the day before PM Keir Starmer attends the Munich Security Conference.

Many of them were seen covering their faces and holding signs saying “shut Elbit down” and “stop arming Israel”.

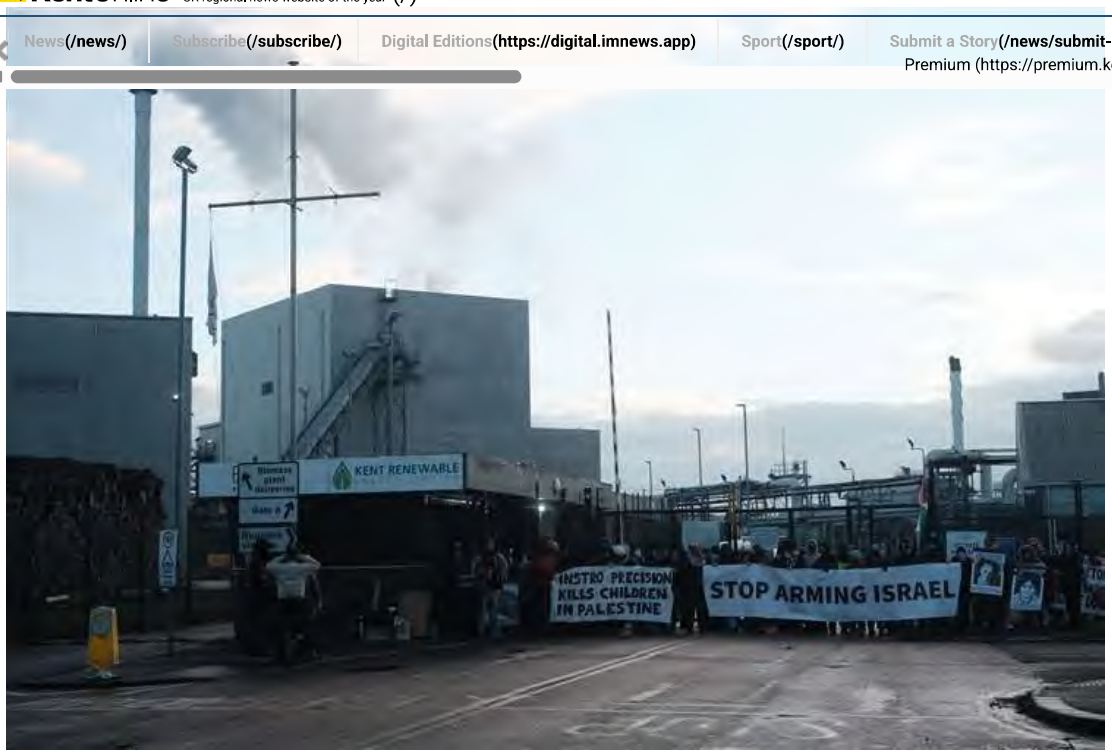
An Arms Embargo From Below spokesperson said: “Peace starts here at home, not just in Munich.

“As Kent residents and our supporters from across Britain, we will continue protesting Instro Precision and its parent company, Elbit Systems, until our demands are met.



Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

The activists are protesting against Instro Precision, which is a subsidiary of Elbit Systems UK. Picture: Arms Embargo From Below



They are outside the entrance to the site in Sandwich Discovery Park. Picture: Arms Embargo From Below



Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

They are part of a new grassroots organisation called Arms Embargo From Below. Picture: Arms Embargo From Below

Police and protesters clashed in ugly scenes **outside the site on January 23 (https://kentonline.co.uk/thanet/news/watch-police-and-protesters-clash-in-ugly-scenes-335534/)**, where fireworks were reportedly thrown.

In October, **nine people appeared at the Old Bailey (https://premium.kentonline.co.uk/sandwich/news/palestine-activists-deny-causing-damage-worth-1m-to-kent-we-331354/)** accused of causing more than £1 million worth of damage to the weapons factory.

The activists, allegedly supporters of the now-banned protest group Palestine Action, are said to have filmed themselves as they broke into Instro Precision in the early hours of June 17, 2024.





Members of the group are holding signs saying "shut Elbit down" and "stop arming Israel". Picture: Arms Embargo From Below

More than 70,000 Palestinians have been killed as a result of Israel's military campaign in Gaza since, according to the territory's Hamas-run health ministry.

The offensive was launched in response to the Hamas-led attack on southern Israel on October 7, 2023, in which about 1,200 people were killed, and 251 others were taken hostage.

Human Interest (/Categories/Human-Interest) Politics (/Categories/Politics) Sandwich (/Categories/Sandwich)
Syndicate (/Categories/Syndicate) Cara Simmonds (/Authors/Cara-Simmonds)

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

DECLASSIFIED UK

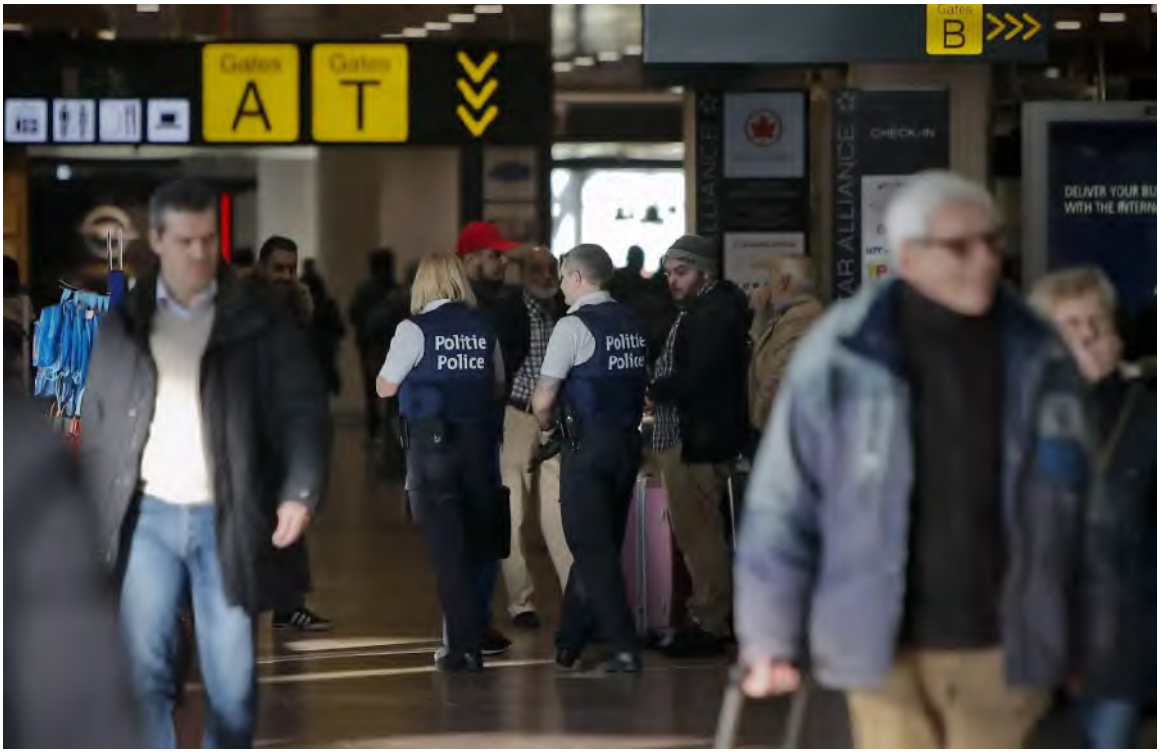
INVESTIGATIONS:

INVESTIGATION URGED OVER ILLEGAL UK ARMS SHIPMENTS TO ISRAEL

After Declassified helped uncover a suspicious military transfer from Britain to Israel, over 60 MPs and Lords have called for answers

JOHN MCEVOY

16 JUNE 2026



Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

MPs who have signed the letter include Diane Abbott, Richard Burgon, John McDonnell, and Hannah Spencer, while the Lords include Baroness Sayeeda Warsi and John Hendy KC.

It has also been signed by Abtisam Mohamed MP, who sits on the foreign affairs select committee.

The move comes after *Declassified*, Belgian NGO Vredesactie, Irish news outlet *The Ditch*, and Palestinian Youth Movement discovered a suspicious package of military goods bound for Israel in March.

Belgium has strict laws on the transhipment of military items to Israel through its ports and airports, including a ban on overflights carrying weaponry through its airspace.

The shipment was seized by the Belgian authorities, which confirmed that it contained items covered by UK export codes for military aircraft and fire control components.

They did not refute that some of the items may have belonged to Moog, a US aerospace firm in Wolverhampton which manufactures trainer aircraft components for the Israeli air force.

A Belgian government spokesperson told *Declassified*: "No transit licence request was issued; if it had been, it would have been refused".

RELATED



READ MORE

Arms to Israel

Published this morning and authored by Steve Witherden MP, the letter is now asking the UK authorities to explain how an illegal arms shipment to Israel was exported from Britain.

Addressed to trade secretary Peter Kyle, it asks for clarification on when the authorities first became aware that UK-origin arms were being illegally shipped to Israel.

Declassified understands that the March shipment was not the first instance of UK arms bound for Israel being intercepted in Belgium.

The letter further asks whether the Belgian authorities, arms manufacturers, and cargo carriers responsible for the shipment have been consulted over the issue.

In addition, it asks whether the trade department will subject the responsible arms firms to compliance visits to ensure they are conforming with their legal obligations.

The final question centres on whether the government will commit to examining whether logistics companies operating in the UK, including UPS and Challenge Airlines, are fully compliant with arms export regulations.

If not, the letter asks whether those logistics companies will be excluded from public procurement processes.

The full letter can be seen below:

DECLASSIFIED UK

INVESTIGATIONS:



HOUSE OF COMMONS
LONDON SW1A 0AA

Rt Hon Peter Kyle MP
Secretary of State for Business and Trade
Department for Business and Trade
Old Admiralty Building
London, SW1A 2DY

15th June 2(

Dear Rt Hon Peter Kyle MP,

We are writing regarding the seizure of two shipments of military equipment being transferred from the United Kingdom to Israel, which arrived at Liège Airport on 24 March 2026.

This followed an alert issued to Belgium Authorities by *Declassified*, *Vredesactie*, *The Ditch*, a the *Palestinian Youth Movement*. The cargo was examined by a specialist engineer, who identified the presence of fire control systems and spare parts for military aircraft.

The UK arms export control codes associated with these goods were ML10 and ML5, relating respectively to military aircraft and fire control components.

Belgium has strict legal restrictions on the transhipment of military goods through its ports ar airports, including a prohibition on overflights involving weaponry through Belgian airspace. A spokesperson for the Belgian government has confirmed that no transit licence was requeste and that, had such a request been made, it would have been refused.

Given the Belgian authorities have now opened a criminal investigation, please clarify:

A. When did the Department for Business and Trade (DBT) first become aware that UK-

TAGGED:

Arms shipments | Belgium | Israel | Moog | Palestine | Peter Kyle

ABOUT THE AUTHOR

DECLASSIFIED UK

INVESTIGATIONS:

John McEvoy is Chief Reporter for Declassified UK. John is an historian and filmmaker whose work focuses on British foreign policy and Latin America. His PhD was on Britain's Secret Wars in Colombia between 1948 and 2009, and he is currently working on a documentary about Britain's role in the rise of Augusto Pinochet.

VIEW MORE ARTICLES

YOUR DONATION FUNDS OUR INVESTIGATION

DONATE TODAY

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

DECLASSIFIED UK

INVESTIGATIONS:

JURY REFUSES TO CONVICT PALESTINE ACTIVISTS OVER ARMS FIRM RAID

Hung jury in case of four protesters who raided Wolverhampton arms factory said to produce “military aircraft parts for Israel”

JOHN MCEVOY AND HANNA-JOHARA DOKAL

18 JUNE 2026



Activists cut through the roof of an arms factory. (Photo: Staffordshire police handout)

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

owned by Moog, a US aerospace firm, in Wolverhampton.

During the trial, the jury saw footage from helicopters and CCTV cameras which showed the defendants crashing through the site's front gate and damaging solar panels on its roof.

Prosecution lawyers presented this as an open and shut case given the defendants admitted in court to occupying the roof in order to shut down the factory's production line.

They said the trial "is not about Israel, it's not about Palestine… It's simply about whether they unlawfully damaged property".

But the jury was also shown a social media post demonstrating that the activists' goal was to disrupt the supply of UK-made fighter jet components to Israel.

In that social media post, the four defendants were wearing T-Shirts bearing the names of Palestinians who had been killed by Israeli airstrikes, including the author Refaat Alareer.

Watch our report from outside court

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

Defence counsel Mira Hammad told the court last week that there was “no mystery about why the [four defendants] were there”.

It was “on their T-shirts. It’s right there in… the tweet [discussing] military aircraft parts to Israel”.

Shortly after the verdict was delivered, Yun-Stevens and Sherman addressed some 20 supporters who had gathered outside the courthouse.

Yun-Stevens led chants of “Free Palestine” while Sherman thanked those who had offered encouragement throughout the trial.

Evans, wearing a keffiyeh, told *Declassified* he felt “relieved” by the verdict.

A one-minute silence was also held outside the courthouse for Palestinians who have been killed in Gaza.

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041



Police detain three of the group on the roof of Moog's factory in Wolverhampton. (Image: Staffordshire police handout)

'The more lives we would save'

During the trial, the jury also heard from the defendants directly.

Alkhamesi, 23, told the court last Tuesday that the "main intention" of the action was "to occupy the roof" because the "factory can't operate while we're on the roof".

Evans, who previously worked in the aerospace sector, told the court: "We believed the longer we stayed up there, the more lives we would save. The idea was that the longer we stay on the roof, the longer the factory would be shut down".

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041



'Free Palestine' banner hung from Moog factory in Wolverhampton. (Image: Staffordshire police handout)

Yun-Stevens described the concept of direct action and noted in court how a full arms embargo has still not been imposed on Israel.

Sherman, who dismissed their own legal representation to offer their own closing statement, declared: "I will always in my heart know that using care and intention to disarm the factory is not criminal".

They added: "As Iain told you, the longer we stayed up there, the more lives we could save; as Hisham told you, we intended to disrupt shipments, disrupt production; and as Hana told you, we disrupted only what we deemed to be criminal".

All of the four activists have been immediately released on bail.

The Crown Prosecution Service (CPS) is expected to decide on whether it seeks a retrial within the coming weeks.

TAGGED:

Frank Sherman | Hana Yun-Stevens | Hisham Alkhamesi | Iain Evans | Israel | Moog | Palestine | Protest

DECLASSIFIED UK

INVESTIGATIONS:



John McEvoy is Chief Reporter for Declassified UK. John is an historian and filmmaker whose work focuses on British foreign policy and Latin America. His PhD was on Britain's Secret Wars in Colombia between 1948 and 2009, and he is currently working on a documentary about Britain's role in the rise of Augusto Pinochet.

VIEW MORE ARTICLES



Hanna Dokal is a video journalist based in the UK. She has worked on short documentaries, commercial shoots and short video content for global publications. She was previously the social video producer for the Financial Times and a freelance writer focusing on human rights.

VIEW MORE ARTICLES



Moog UK: Training genocide pilots

Take action now and email your MP about Moog UK's role in M-346 trainer aircraft production, and the ways in which the UK's export licensing system facilitates British complicity in the Gaza genocide.

EMAIL YOUR MP

Last updated 9 June 2026

Moog, an American weapons corporation with more than a dozen sites across the UK, produces components for the F-35 "genocide jet". Moog is also involved in the Trident D5 nuclear missile programme.

As well, Moog produces components for the M-346 Lavi trainer aircraft. The M-346 is the final stage of training aircraft used by Israeli forces before they fly the deadly F-16s and F-35s. Moog and Martin-Baker, a British company also involved in both the F-35 and M-346 supply chains, have held export licences to Israel throughout the Gaza genocide *after* the September 2024 partial export licence suspension was implemented.

An Open Individual Export Licence (OIEL) was further issued during the fourth quarter of 2025, for components for military training aircraft for transfer to France, Greece, Israel or Italy. This licence is likely to be used by Moog, for the M-346 trainer aircraft.

Where is the accountability?

In April 2026 it was revealed that Belgian authorities seized a shipment of military goods exported from the UK, which were in transit to Israel. Belgium has much stricter export licensing controls on Israel than the UK does, and because the military goods were without the relevant

transit licence, a criminal investigation is underway. **Although Belgian authorities have refused to name the arms company involved, the Belgium government did confirm that the initial complaint focused on Moog.**

Activist-submitted FOIs show that the Department of Business and Trade (DBT) and the Export Control Joint Unit (ECJU) **did not review, suspend, amend nor revoke any relevant export licences following the seizure of the military goods in Belgium.** The FOIs further reveal that the DBT did not receive any compliance disclosures, enquiries or notifications from exporters, freight forwarders, or logistics providers concerning the transit, routing or reexport of UK Military goods to Israel via Belgium.

Criterion 7 of the SELC states that export licence approvals must take into account the risk that exports will be diverted to an "undesirable end-user". **Given the lack of investigation from the DBT following the seizure of the UK exports in Belgium, how can we trust that investigation is being done to ensure there is no diversion of exports from the UK to "undesirable end-users"?**

Furthermore, how can we trust that investigation and follow-up is being conducted to ensure military goods approved for export licences to Israel that are supposed to be re-exported to another country actually do make it out of Israel? Will the £8.7 million Open Individual Export Licence (OIEL) issued to Israel in Q4 of 2025 for military "components and technology for targeting equipment" be re-exported as the DBT is arguing, or will the military goods follow the way of the UK-produced Watchkeeper drone components, which were supposed to be sent onto Romania but remained in Israel?

And how can the UK's export licensing system seemingly not take into account the export control regulations of the countries its exports are moving through?

The M-346: training genocide pilots

The notorious F-35 loophole allows for the continued export of F-35 components to Israel if sent via a third country, **but how is it that components for the M-346 trainer aircraft have continued to be exported to Israel during the genocide?**

In September 2025, Trade Minister Sir Chris Bryant told the Business and Trade Sub-Committee that licences for Israel which are still active **included components for trainer aircraft.**

Chair of the committee, Liam Byrne MP, questioned this – asking if the trainer aircrafts would be used by fighter pilots who would then go on to engage in "combat over Gaza". **Bryant responded that the training for the pilots would take so long that it would not be possible for the pilots to be involved in Gaza "combat" following their training.**

By using a time-frame argument, **Bryant has essentially admitted that the trainer aircrafts *do* play a role in facilitating the Gaza genocide.**

The UK government chose not to include export licences for trainer aircrafts in its September 2024 partial export licence suspension, arguing that they are not used in military combat. An internal briefing regarding Bryant's presentation to the Business and Trade Sub-Committee, obtained through activist FOI request, states that trainer aircraft components can continue to be exported to Israel as they "have no operational role in the present conflict in Gaza". There was no mention of the length of training time.

However, a further internal Foreign Office briefing obtained by Declassified from October 2025 acknowledges that the M-346, while not used for combat missions, **"facilitates the development of an offensive capability".**

Export Licensing System violations?

The UK's own Strategic Export Licensing Criteria (SELC), section 2C, states that the decision to grant an export licence must consider whether the licence risks committing or *facilitating* a serious violation of International Humanitarian Law (IHL).

How can "facilitating the development of an offensive capability" for a country which has shown no regard for IHL over the past several years of genocide not be in violation of this criterion?

Training a pilot who will drop 2000lb bombs over Gaza facilitates the Gaza genocide. If it didn't, why would Bryant try to make an argument about the length of training time?

Moreover, it can actually take less than a year for Israeli pilots to go from training on an M-346 to flying over Gaza in an F-16 or F-35. Ensuingly, it appears that Bryant's statement to the Business and Trade Sub-Committee was misleading in multiple ways.

Not only did Bryant apparently over-state the length of training-time needed, but he also seems to imply that he has an idea of when the Gaza genocide will end. With no end to the genocide in site, it is impossible to argue that any amount of training time would be enough to delay the trainer aircrafts facilitating the Gaza genocide.

CAAT calls for the following actions to be taken:

- Immediately suspend all UK export licences for components for the M-346 Lavi trainer aircraft.
- Implement a complete, two-way arms embargo on Israel, which includes the export of all components involved in the training of Israeli forces.

Export licences which *facilitate* the Gaza genocide must be included.
- Call for an immediate investigation into the continuous export of trainer aircraft components from the UK to Israel since the 2024 partial arms suspension.
- Implement measures to ensure that exporters comply with third country export and transit controls when exporting licensed goods, and to suspend licences when they breach them.
- Call on the Business and Trade Committee to hold the government to account about the seizure in Belgium of military goods, exported from the UK, that were in transit to Israel
- Call for a review of the UK's Strategic Export Licencing Criteria (SELC) to ensure criterion 2C and criterion 7 are upheld.

CAAT would not exist without its supporters. Each new supporter helps us strengthen our call for an end to the international arms trade.

Keep in touch

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041



MAPPED: The UK companies arming Israel, including producers for the F-35 combat aircraft

Say no to the genocide profiteers on YOUR doorstep!

Last updated 24 August 2025

Welcome to CAAT's interactive map of UK companies recently involved in arming Israel, including those manufacturing components for the F35 combat aircraft.

15% of every F35 that Israel is using to bombard Gaza is made by British industry. Recent research has found that British manufacturers alone have received contracts to produce F-35 components worth **over $6.7 billion**. In addition, many other companies have received export licences to Israel in the past few years, for other types of military equipment.

The information shown on this map, about the companies arming Israel, has been obtained through Freedom of Information (FOI) requests submitted by CAAT and others. See also the FAQs about this map and the information on it, and our recent briefing on UK arms sales to Israel.

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

Search for your area, find your local arms dealer, and say NO to companies profiting from genocide on YOUR doorstep!

For more information on UK arms supplies to Israel, the Israeli arms industry, and Israel's ongoing occupation and repression of the Palestinians, see our main Israel country page.

Explore details of other export licences (apart from the F-35 components) issued by the current government for arms sales to Israel, since 2015, from our UK export licences browser. This includes information on the companies holding each licence for most licences since October 2021.

Find more information about some of the companies listed on the map on our Companies Browser.

Most exports for UK-made components for the F-35, whether to the US (which makes the complete planes), or to other partner or customer countries (including Israel), are covered by an Open General Export Licence (OGEL). An OGEL allows companies registered for the licence to export unlimited quantities of equipment to the relevant countries, so long as it is for the F-35, without need for individual licences. Thus, most F-35 exports do not need an individual licence, and are not covered by the export licences browser. The map displays all companies in the UK that are registered for this OGEL. These companies are shown by **red** pins on the map.

The companies holding other export licences to Israel, which are also included in the export licences browser, are shown by **blue** pins on the map.

Companies which are registered for the F-35 OGEL and which have received other export licences to Israel, are shown by blue and red **striped** pins on the map.

For more information read the FAQs about this map.

NB: While it is likely that the great majority of exports for the F-35 are conducted using this OGEL, there may be other companies that are involved but are not registered for the OGEL, instead applying for Single or Open Individual Export Licences (SIELs or OIELs) as needed. We know that there have been other export licences for F-35 components for which Israel was an authorised destination, though these may have been indirect licences via the United States or another country.

It is also not necessarily the case that all companies that are registered for the OGEL are *currently* producing and exporting components for the F-35, and at least one company, Strain Measurement Devices, claims to have stopped in 2021.

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

However, the fact that a company registered for the OGEL clearly implies that, at the time they had an expectation of conducting regular exports for the F-35.

Some of the other export licences to Israel held by the companies shown on this map are no longer extant. Others will have been suspended as part of the government's decision on 2 September to suspend certain export licences to Israel for use in Gaza. The companies shown on this map have nonetheless received export licences to Israel at least since October 2021.



Known F-35 production site

Head office

F-35 producer

Military Export Licence Holder

moog

Reset map

F-35 producer

Israel military export licences

Moog

UK Military Export Licence Holder

- **1** military export licence to Israel since 2021.
- The licence has been identified in our UK export licence browser.

C/O Moog Controls Limited, Ashchurch, Tewkesbury, Gloucestershire, GL20 8NA

Registered office
Ashchurch, Tewkesbury, Gloucestershire GL20 8NA

Registered address

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

CAAT would not exist without its supporters. Each new supporter helps us strengthen our call for an end to the international arms trade.

Keep in touch

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041



Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

Morning Star for Peace and Socialism

Gaza Genocide / 24 August 2026

Activists occupy roof of factory ‘producing crucial parts’ for Israeli fighter jets

‘This is for the children of Palestine,’ People Against Genocide say after targeting a Martin-Baker site in Buckinghamshire



People Against Genocide activists on the roof of a Martin-Baker factory in Denham, Buckinghamshire, August 24, 2026

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

ACTIVISTS occupied the roof of a factory “producing crucial parts” for Israeli fighter jets to stop attacks on Palestinians, a direct action group said today.

People Against Genocide said two protesters had been arrested today after videos had been shared of activists breaking solar panels and pouring red paint on the roof of a Martin-Baker site in Denham, Buckinghamshire.

The group said it was targeting the firm over its supplying of ejector seats for Israeli F-35 warplanes, which are deployed against Palestinians.

The action was shared today on the Aftershock platform, which documents global actions and demonstrations for Palestine.

People Against Genocide said the company’s products were “linked to attacks on civilians” in Gaza and Lebanon.

“This country, this Labour government, says that we have a partial arms embargo [on Israel],” they said.

“How can that be true when Martin-Baker … are selling parts to Israel and trading with them?

“They’re complicit in the genocide and they’re complicit with the zionist war machine. This is for the children of Palestine.”

One activist who appears in the video added that the owners of the firm have “a fortune of £1.699 billion,” adding that “they made that fortune from killing civilians.”

At least two activists appeared in photos later shared on social media, showing them holding a Palestinian flag and wearing shirts reading “People against genocide.”

Martin-Baker refused to comment when approached by the Morning Star.

A Thames Valley police spokesperson told the Star: “We were made aware of a protest at around 5:30am yesterday at Martin-Baker Aircraft Company Lower Road, Denham.

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

"Two women gained access to the roof of the building and caused damage to the premises.

"Officers attended the scene and worked alongside partner agencies to ensure the incident was resolved safely and with minimal disruption.

"A 20-year-old woman from London and a 27-year-old woman from Yorkshire have been arrested on suspicion of criminal damage.

"They have been released on police bail whilst enquiries continue."

Daily Worker 95-100 Years Morning Star
Donate to the 95th Anniversary Appeal

Christophe Domec

Similar stories



Arms Trade

A coalition of peace and anti-militarism organisations protest the five-day Farnborough International Airshow

20 July 2026



Gaza Genocide

Activists blockade arms manufacturer Leonardo UK's Edinburgh site over role in arming Israel

16 July 2026

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

Protesters target five insurance offices for connections to Israeli arms manufacturer

By George McDade | 10 September 2026

'Previous insurers have been forced to cut ties with Elbit Systems following sustained pressure,' says protester

Protesters have targeted five UK offices of the insurers Chubb and Sompo over the firms' connections with Israel-based arms manufacturer Elbit Systems.

The protests – which took place on 9 September 2026 in a "nationwide day of action" across London, Manchester, Glasgow and Maidstone – called for the insurers to rescind their cover of Elbit Systems and its subsidiary UAV Engines in the UK and of Elbit in the US.



Protester at the nationwide day of action

The campaigners, some of whom represented a group calling itself the Palestine Resistance Collective, said they had delivered a letter to Chubb management in Glasgow, while other offices temporarily saw their entranceways blockaded.



Protesters at the nationwide day of action

One Glasgow protester said they were demanding that "Chubb come clean about the state of their relationship with UAV and Elbit" and that "companies on our high streets act within international law".

Another in Manchester added that "previous insurers have been forced to cut ties with Elbit Systems following sustained pressure. Chubb will be no different".

Boycott Bloody Insurance

The protests were also attended by campaign group Boycott Bloody Insurance, an organisation which in recent months has protested insurer Aviva's cover of migrant detention centres, the industry's involvement with liquefied natural gas projects and Allianz and Aviva's connection to Elbit Systems.

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

Read: Protestors target Aviva over immigration detention centre links

Read: Protestors disrupt Aviva AGM

Explore more insurer-related news here, or discover other news stories here

At the time, Boycott Bloody Insurance claimed that its activities had led to Allianz and Aviva dropping employee liability insurance of the arms manufacturer, a role it believes has since been filled by Chubb.

Andrew Taylor, member of Boycott Bloody Insurance, said: "Israel relies on Elbit's weapons and technology and Elbit wouldn't be able to operate without insurance from Chubb.

"People of conscience all over Britain will continue to reject Chubb's complicity in war crimes until they see it come to an end."



MORE GEORGE MCDADE



From keyless hacking to conflict zones – how the UK's stolen vehicles fuel a global trade

Beazley launches new cyber endorsements to cover firms' internal AI use

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

BAE Systems: Complicit in Genocide

POSTED ON JUNE 24, 2026

Accept

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041



When

24/06/2026
11:00 am
Add To Calendar

📍 BAE Systems, Burcote Road, Towcester, NN12 6TF

⏰ Wednesday 24 June 2026, 11am

Accept

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

Stand with Northamptonshire PSC branch and protest against BAE systems.

Stop arming Israel. End complicity now. Join us in protest.

YOUTUBE (HTTPS://WWW.YOUTUBE.COM/@PALESTINESOLIDARITYCAMPAIGN/VIDEOS)

BLUESKY (HTTPS://BSKY.APP/PROFILE/PSCUPDATES.BSKY.SOCIAL)

INSTAGRAM (HTTPS://WWW.INSTAGRAM.COM/PALESTINESOLIDARITYUK/?HL=EN)

TIKTOK (HTTPS://WWW.TIKTOK.COM/@PALESTINESOLIDARITYUK)

TWITTER / X (HTTP://WWW.TWITTER.COM/PSCUPDATES)

FACEBOOK (HTTPS://WWW.FACEBOOK.COM/PALESTINESOLIDARITYUK/)

PALESTINE SOLIDARITY CAMPAIGN

ADDRESS

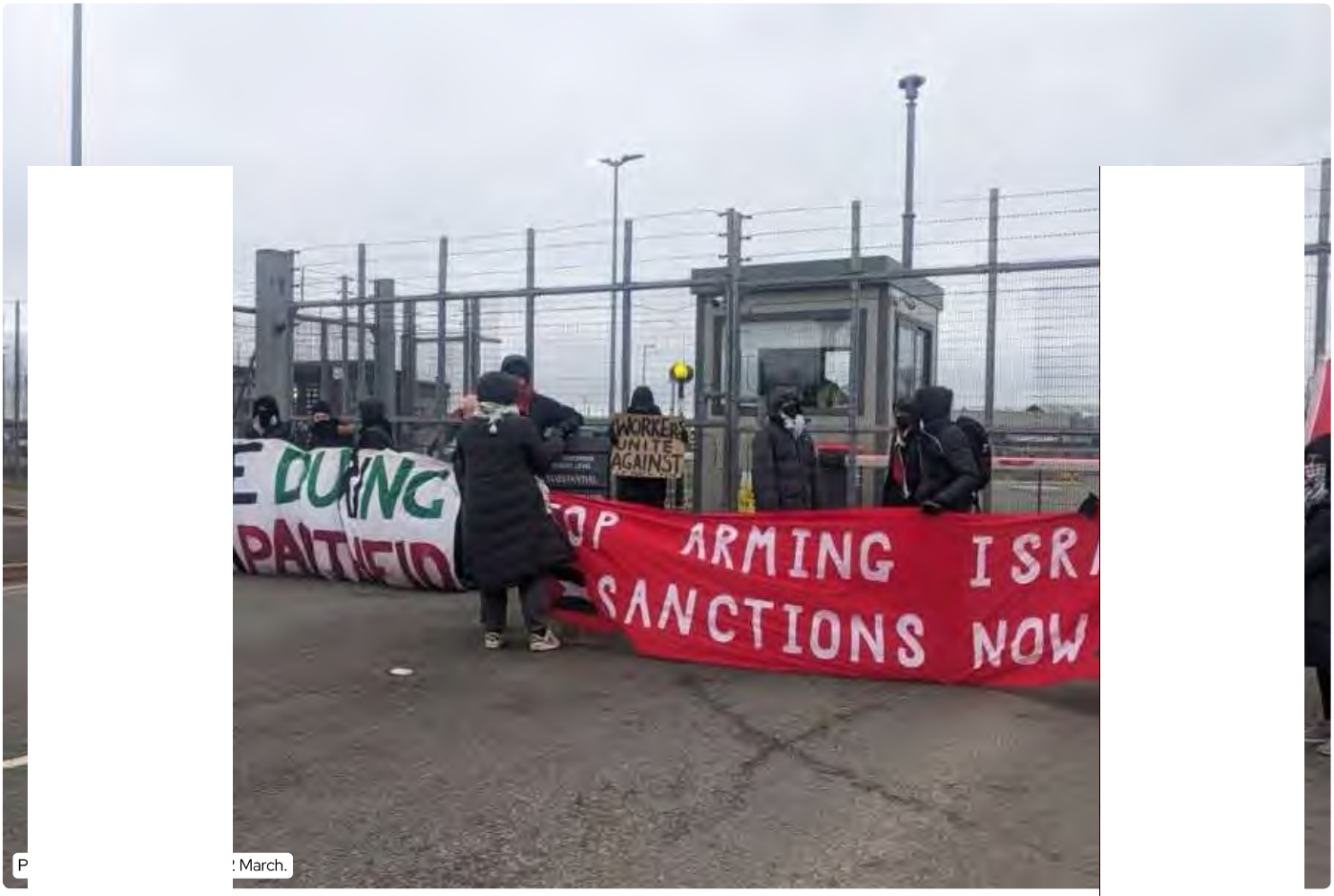
Palestine Solidarity Campaign
Box BM PSA
London
WC1N 3XX

ABOUT

About us (https://palestinecampaign.org/about)
Our aims (https://palestinecampaign.org/about/aims/)
Opportunities (https://palestinecampaign.org/about/opportuniti

Accept

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041



March.

Entry points to BAE Systems in Samlesbury blocked by protests

The protest was organised to highlight the use of BAE Systems products in conflict in the Middle East.

Posted on 12th March 2026 – 1:39pm

Article by Luke Beardsworth ›
Co-editor

Workers at BAE Systems in Samlesbury were blocked from entering the site due to a protest by campaign groups across Lancashire.

All entry points to the site on the A59 were blocked on Thursday morning (12 March) for a number of hours before two gates were opened before 9am.

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

The protest was organised by a number of groups who have previously held similar demonstrations outside BAE Systems at Samlesbury.

Read more: Plan to reopen Guy's Thatched Hamlet and begin major rolling refurbishment set out as sale confirmed

They say they hold the protest due to the use of F-35 fighter jets by the Israeli government and said Thursday's protest also recognised that those planes are now being used as part of wider conflict in the region.



They also described Israel as undertaking a genocide, although this is the subject of intense international debate.

BAE Systems said that the current conflict demonstrates the need for strong defence and security, and that they do not sell military equipment direct to Israel. They added that the protest caused minimal disruption.

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041



Protests at BAE Systems on 12 March.

A spokesperson for BAE Systems said: "Our priority remains to protect our people, our business and the vital work we do for the UK and its allies. We respect everyone's right to protest peacefully. Today's protest resulted in minimal disruption and our people continue to work normally."

A spokesperson for Preston People's Collective, who organised the protest in conjunction with Blackburn 4 Palestine and other groups, said: "These factory blockades represent a growing distaste of what is happening inside the BAE Systems factory in Samlesbury.

"As part of their F-35 fighter jet programme they produce parts for the fighter jet that has been used by Israel to commit genocide and now is being used to further its aggression across the region at the cost of innocent human lives.

"To know this is happening on our doorstep is shocking and we want to raise awareness across Lancashire of this in the hopes that people will join us. Every minute of delay causes huge supply chain issues and we know this because of the most recent workers strikes.

"Nobody gets in to these factories on the days we do our blockades and we know it hurts their profit margins. It's important because money talks to these industries above anything else. We have a growing campaign @baeoutcampaign on Instagram where we hope to continue to work on projects alongside the disruption element."

Support Blog Preston: Keep our community reporting going and view the website without any adverts too. Sign up for a membership today.

Stay updated: Keep in touch directly with the latest headlines from Blog Preston, join our WhatsApp channel and subscribe for our twice-a-week email newsletter. Both free and direct to your phone and inbox. Help us report too, by contacting us if

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

Activists target logistics firm in Glasgow supplying Israel

by The Canary — 7 August 2026 in News, UK Reading Time: 2 mins read

189 2 AA 0

Early on Tuesday 4 August, an autonomous group broke into the offices of DB Schenker in Hillington, Glasgow. Bypassing security in the early hours of the morning, the group covered the building's foyer and offices with paint and messages saying "Drop Elbit" on the walls.

The group claims it is 'targeting the supply chain' of Israeli arms and munitions. DB Schenker is owned entirely by DSV. This is a Danish company that allegedly provides 'logistics transport services' to Israeli drone and military technology manufacturer Elbit Systems.

Elbit Systems produces 85% of the Israeli military's drone fleet, in addition to 80% of the state's weapons and equipment. Israel has used Elbit weapons throughout the ongoing genocide in Gaza, in the Palestinian West Bank, against Syria and Yemen, and currently against Lebanon and Iran.



Elbit Systems' drones have also taken part in attacks on international aid flotillas in international waters. Elbit Systems routinely lists its equipment as 'battle-tested against Palestinians'.

DSV has recently come under intense pressure both within the UK and internationally due to its contract with Elbit Systems. Before the Glasgow action, groups in the UK, US, Denmark, Germany, France, the Netherlands, and Ireland had all damaged DSV premises in the past six months alone.

407

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

In April 2026, activists targeted a DSV office at Birmingham Airport, breaking windows and covering building in red paint. In May, a group in Bristol sabotaged a fleet of DSV trucks, slashing tyres and damaging vehicle exteriors. And in July, activists targeted a DSV site in Cork for a third time in the span of several months.

A spokesperson for the Glasgow group stated:



> *As long as DSV and its subsidiaries maintain their contract with Elbit Systems, property damage and disruption will continue. We will interrupt, delay and destroy the supply chain that provides Israel with its weaponry by any means necessary.*
>
> *While DSV's website proudly advertises their track record delivering Christmas gifts on time to children, their warehouses stock parts used to slaughter thousands of kids in Palestine, Lebanon and Iran.*
>
> *DSV supplies hundreds of different industries, and does not depend on Elbit Systems to be able to pay their employees. Sinking to this moral low was their choice. Dropping Elbit could be their wisest logistics decision yet.*

Featured image via the Canary

Tags: israel militarism

Share 142 Tweet 89 Share Send Share Share

Previous Post

Good Law Project says EHRC anti-trans code misinterprets the law

Next Post

UK comedians chime in on 'Frankenchickens' scandal in quiz show





This loophole feels lil shouldn't be allowed.

Jermyn

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041



People Against Genocide Shut Down Keysight's Telford Plant

September 8, 2026

From 6.30AM on Tuesday 8th September, 3 action takers from the pro-Palestine group People Against Genocide targeted the Keysight Technologies facility at The Calibration House, Halesfield 7, Telford, Shropshire, TF7 4QL. They doused the building in red paint to symbolise Palestinian bloodshed and locked-on to prevent access to the premises. Having effectively shut down Keysight's Telford operation, at least for the day, the activists are disrupting production of an Israeli military supplier.

Keysight are an international, American-owned, military electronics company that manufacture radar and electronic warfare systems. They supply UAV Tactical Systems (U-TacS), a drone factory which is now entirely owned by Elbit Systems, Israel's biggest weapons maker. Amongst other drones, U-TacS are responsible for developing the Watchkeeper drone, based on Elbit's Hermes 450 drone, which has been central to the ongoing genocide in Gaza, and linked to the killing of seven aid workers from the World Central Kitchen in April 2024. They have also been used to spy on, and to kill, innocent civilians across West Asia, on behalf of the Israeli regime, and other genocidal regimes around the world. Keysight also have business links to the French weapons giant, Thales.

As well as supplying Israeli weapons firm Elbit Systems, Keysight Technologies works with the US Army, US Air Force and US weapons companies including Lockheed Martin. Keysight also specialises in 5G technology for military applications. The firm collaborates with Lockheed Martin on a 5G military solution called '5G.MIL Unified Network Solutions' which provides a high speed connection for weaponry and military applications used by the US and Israeli military. Keysight also has an Israel-based manufacturing plant.

Because of their involvement in the Gaza Genocide, and links to Elbit Systems, who manufacturer 85% of Israel's killer drone fleet, Keysight facilities have been targeted repeatedly by pro-Palestine activists, with an action against the company's Hampshire Research and Development plant on the 12th of April, and an action targeting the Reading facility on the 21st of January. At the end of last year, People Against Genocide also targeted Keysight's Berkshire Headquarters, as well as their offices in Edinburgh.

The 3-person People Against Genocide team involved in the Hampshire action in April, known as the Keysight 3, were remanded in custody, and are not due to go to trial until July 2027.

In relation to this morning's action at Telford, a spokesperson for People Against Genocide said, "We have covered Keysight's facility in blood-red paint to draw attention to the vast amount of innocent blood this company, and the arms companies they work with, are spilling. The genocide in Gaza has not stopped for a minute, and encouraged by the indifference of world leaders, or their active assistance, the Zionist entity are now pillaging and murdering their way around the

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

West Bank. Keysight play a central role in this slaughter, and shutting them down today is just a brief interruption, but we will be back again and again until they stop.

“We send our solidarity to the Keysight 3, and all those cruelly imprisoned by the genocide-complicit British state, for the crime of opposing war-crimes, and the murder of our Palestinian brothers and sisters. Direct Action is not terrorism.”

MORE NEWS

American Terror — September 11, 2026

People Against Genocide Shut Down Keysight’s Telford Plant — September 8, 2026

PEOPLE AGAINST GENOCIDE TAKE ACTION TO STOP KILLER ROBOTS — September 8, 2026

People Against Genocide Occupy Martin-Baker Factory Roof — August 24, 2026

Instagram

Log in Sign up



thanet4palestine and **3 others**

thanet4palestine Edited • 18 w
INSTRO DISCOVERY PARK SHUT DOWN

PS26|05|26

Instro barricaded this morning for over 4 hours as protesters gathered outside Instro Precision, the Elbit-owned weapons manufacturer based on site.

The company produces military and targeting equipment connected to Israel's operations in Gaza. PS

Instro Precision is owned by Elbit Systems, Israel's largest private weapons company. This company contributes military tech including surveillance, targeting systems, night vision, drone-related equipment and weapons support systems.

#protest #kent #videography #shutelbitdown

563 22

26 May

Log in to like or comment.

More posts from thanet4palestine

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

Date	Description	Source
07/10/2025	De-classified "Moog Article"	Website
18/8/2025	Writing On Bollard - "Free Palestine"	
26/8/2025	Wolverhampton Incident	Internal Comms
09/05/2025	Drone reported above CAG Site - Might have been You Tube Audit?	Internal Comms
09/05/2025	Court injunction filed	[redacted] Email
09/07/2025	AC Reported Suspicious activity -Woman taking video and pictures of the CAG site and reported by Security that she has been observed around the IG site also	[redacted] Email
13/9/2025	Drones over the Wolverhampton Site	Teams Chat - [redacted]
15/9/2025	Writing of Outlet wall "Moog kills Palestinians" in Lipstick	[redacted] Email
18/09/2025	Male approaching Moog entrance to film/take photos of frontage and Moog sign. Produced ID to say he was from Tewkesbury County Council and wanted to use photos as part of an information piece on small& Large businesses within Tewkesbury	
07/10/2025	Plant 3 -Male individual was observed walking from the direction of the train station toward the Moog facility, taking photographs along the way.	On site guard force
08/10/2025	Suspicious Male Taking Photographs Near Moog Facility - Police informed	[redacted] Security
09/10/2025	Luton - Someone looking at injunction, police and photos. Found to be airport pick up	
10/10/2025	Suspicious person approached front gate via bushes, security spoke to and he said he used to work here but we do not believe this is the case, he left when challenged, some concern he may have been here on the day of the August attack. Reported to police. We believe tha[redacted] is family member (possibly dad) of Hana Yun Stevens (one of the 4x who attacked the site 26AUG2025).	[redacted] Security
23/10/2025	Declassified release another article https://www.declassifieduk.org/us-arms-firm-secures-ban-on-palestine-protests-in-britain/	
12/11/2025	Palestine Action are active in Reading this morning and just caused damage at a company in Winners' which is just a few miles down the road	
11/11/2025	On the morning of 11th November 2025, damage was reported to the perimeter fencing at the MOOG P2 site. The incident was reported to the police under incident number 8211112025.	[redacted] Security
17/01/2026	Unauthorised Vehicle at P3 - a vehicle was identified as being parked in the P3 car park for the duration of the day. The vehicle remained under observation by the security team. No individual associated with the vehicle was identified at the time of the report.	
02/02/2026	https://www.declassifieduk.org/uk-ignores-corruption-scandals-when-awarding-major-military-contracts/ another declassified article	

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

20/03/2026	At approximately 10:00 on 20th March 2026, a contractor reported witnessing a drone flying over the P1 area. -It is believed that the drone may have been being used to survey a neighbouring building that is currently being sold.	
07/04/2026	incident at Luton on Friday strange chap reading all the signs at 11pm and went round them all in Unit C . Was told to leave by security and was asking what equipment we have on site etc. police called and I came out as well.	
04/05/2026	[redacted] on site with [redacted] conduct Threat Assessment	[redacted] Security
13/04/2026	Declassified has been sent to Wolverhampton and Tewkesbury reception email addresses requesting for information for an article by 4pm, https://www.declassifieduk.org/how-a-uk-arms-shipment-to-israel-was-seized-in-belgium/	
20/04/2026	Person with a drone outside of the Wolves Facility. It's not in the air yet but we have called the police. Update: The individual has been arrested with a suspicion of breaching the National Security Act legislation. He is currently helping the police with their enquiries while they look at any recorded footage.	
24/04/2026	Birmingham: On 23–24 April 2026, activists vandalized the offices of the logistics company DSV, alleging the firm facilitates the transport of weapons to Israel https://www.facebook.com/watch/?v=1637525517295218&vanity=aljazeera&http_ref=eyJ0cyI6MTc3NzAxNjg0NT...	
24/04/2026	Leicester: 24th April 2026, Activists occupied a factory owned by Elbit Systems UK (a drone manufacturer), drilling through the roof to abseil into the building to protest government collaboration https://x.com/the_aftershock_/status/2047533884745625723?s=46	
28/04/2026	Wolves - vehicle conduct hostile reconnaissance in the early hours of this morning. The police were called but didn't arrive until after the event. Photos were taken of at least two of our vehicle access control points and whilst they were identified, it is unclear if the guards made them aware they had been spotted	
01/05/2026	Government has raised the terror threat level to Severe: an attack is highly likely -an overview. https://www.bbc.co.uk/news/live/c3ve2nr60xzt?post=asset%3A64b43513-fd84-47dc-a219-e89977293a06#post	
24/07/2026	2x Police officers attended the site and provided the security team with an update, that several buildings in Brookworth had recently been painted with red paint, which they believed may have been carried out by suspected protesters.	
30/08/2026	At approximately 00:27 on 30th August 2026, a drone was observed flying over the P1 site. Based on the direction and location from which the drone was observed, it is believed that the drone may have been operated from the P2 site area. *Confirmed	
12/06/2026	[redacted] from Gloucestershire Constabulary visit with [redacted] from [redacted] to walk through sites and liaise to further relations.	
29/07/2026	Incident involving two Moog visitors and a memebr of Public .	
19/07/2026	Wolves email Message - Hostile activity	
13/08/2026	Injunction updates applied to both CAG & IG sites - confirmation sent to [redacted] at Wolverhampton.	

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

[redacted]

Please see the below paragraph from Staffordshire police in relation to the efficacy of the existing injunction.

'Since the injunction was last granted at Moog aerospace there have been no further incidents of aggravated trespass, obstruction, or criminal damage at the site. From a policing perspective, this demonstrates that the order has been effective in preventing a recurrence of unlawful activity, has reduced the demand placed on police resources in responding to such incidents, and has protected the safety of staff, protesters and emergency responders. The order continues to target unlawful conduct rather than lawful protest. Evidence clearly supports that businesses who do not have injunctions in place continue to be targeted and are victims of both serious disruption and damage.'

[redacted]

[redacted]

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

[redacted]

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

[redacted]

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

US ARMS FIRM SECURES BAN ON PALESTINE PROTESTS IN BRITAIN

Court documents reveal aerospace firm Moog has obtained an injunction against protesters in Britain and even consulted the police about Declassified.

JOHN MCEVOY

23 OCTOBER 2025



A Moog system with missile launcher on display at an airshow. (Photo: Alexander Bogatyrev / Alamy)

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

- **Amnesty International warns "these injunctions are created solely to intimidate people"**

A US arms firm has launched legal action against pro-Palestine activists in Britain, it can be revealed.

Court documents show Moog, which makes military aircraft parts and has links to Israel's arms trade, applied for an injunction in September to prevent protests at its UK sites.

The application, which was granted by the High Court, sought to stop "persons unknown" who "for the purpose of protest enter occupy or remain on" the firm's facilities across Britain.

Moog returned to court earlier this month and obtained a wider injunction to cover interference with "access to or egress from that land and premises".

This means protesters are barred from blocking traffic around entrances and exits and face risk of arrest on public land adjacent to the company's sites.

Moog requested the injunction after its factory in Wolverhampton was targeted by a direct-action group named "Palestinian Martyrs for Justice".

In August, four members of that group crashed through the factory's gates and smashed its rooftop, allegedly causing over £1m in damage.

The activists accused Moog 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 exposed how Moog sent at least ten shipments of trainer aircraft parts from Wolverhampton to an Elbit Systems site in Israel between December 2024 and July 2025.

Moog did not respond to our requests for comment at the time but *Declassified* appears no fewer than 44 times in the

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

company's first witness statements to the court.

The company went so far as to consult with Staffordshire police about *Declassified*'s work before our investigation had even been published, the documents show.

Amnesty International said it was "seriously concerned by the development of so-called 'persons unknown injunctions' by the British courts, and their impact on peaceful protest rights".

Its UK law and human rights director Tom Southerden told *Declassified*: "Such injunctions are routinely issued for companies, landowners and public authorities without any opposition, anyone putting the counter arguments or anyone testing the evidence that the applicants seek to rely on.

"They bring with them hugely inflated punishments for acts of protest, as breaching them constitutes contempt of court.

"Potentially even worse are the financial risks faced by anyone caught up in them, who face the prospect of having to pay the legal costs of major multinational corporations, leading to people losing their homes and being made bankrupt.

"These injunctions are created solely to intimidate people into not protesting and urgently need to be curtailed".

RELATED



ISRAELI FIGHTER PILOTS TRAINING WITH UK EQUIPMENT

READ MORE

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

Declassified

Moog's witness statement implies that *Declassified* bears responsibility for pro-Palestine direct-action campaigns against arms firms in Britain.

To this end, the company urged the court to issue the injunction because *Declassified* has published investigations into Moog's links to the Israeli arms industry.

"Prior to its proscription, there was a clear pattern of UK-based companies being targeted by protests from Palestine Action and other pro-Palestinian organisations, particularly after being named in Declassified", the witness statement says.

It goes on to note how protests took place across several BAE Systems sites in December 2023, weeks after *Declassified* had published an article "alleging that BAE manufactured key parts for the F-35 fighter jets being used to support strikes on Gaza".

Moog curiously omits how it is common knowledge that BAE Systems produces key parts for F-35s because it is stated on its own website.

Moog also attempts to construct a timeline between a *Declassified* report on 8 May 2025 and Elbit-owned Instro Precision being targeted by Palestine Action later that month.

"Following publication of the article, there was a… Palestine Action attack aimed at Instro Precision on 29 May 2025. In this instance, Palestine Action targeted the registered London address of Discovery Park", the witness statement reads.

But this was far from the first time that activists had protested Instro Precision, with trade unions demonstrating at the factory in October 2023 and Palestine Action targeting the company in June 2024.

Moog did not approach *Declassified* for comment before issuing its request for an injunction, thereby offering no

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

opportunity to respond to its claims.

The company also omitted from its witness statement that *Declassified* not only approached the company for comment via email but also offered a right of reply over the phone.

While Moog refused to comment, its witness statement reveals that *Declassified*'s approaches were shared with Staffordshire police before our article had even been published.

"On 4 July 2025, a police officer from South Staffordshire… visited the site, reviewed the email sent from Mr McEvoy at Declassified, discussed safety at the Wolverhampton Site in the event of a protest", the document notes.

'Specific allegations'

In its witness statement, Moog does not attempt to refute *Declassified*'s reporting, saying it would not be company policy "to respond to any of the specific allegations made… in the Article".

The firm nonetheless says it does not "accept the characterisation of Moog's business activities in the Article and, in particular, the link it attempts to make with the situation in Gaza".

It is unclear on what specific basis Moog is trying to distance itself from "the situation in Gaza".

But cargo documents show, since December 2024, the company has exported M-346 Lavi components to an Elbit Systems factory in Israel as well as to the country's ministry of defence.

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

Trade minister Chris Bryant attempted to justify the export of these parts to Israel last month, saying: "The assessment is that the training of an aircraft pilot on such equipment would

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

take so long that they wouldn't be the people that would be engaged in fighter combat in Gaza".

But this claim is refuted by the *Jerusalem Post*, which says "cadets… spend six months training in the Lavi advanced fighter instruction aircraft during their Operational and Advanced Operational Training Course".

A US air force report also recently estimated that it could take just 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.

RELATED



UK AEROSPACE FIRM SUPPLYING ISRAEL'S DEFENCE MINISTRY

READ MORE

Damage

Moog's witness statement also details the financial impact of the direct-action campaign at its Wolverhampton factory.

The company says 95% of the solar panels on the roof were "destroyed at an estimated approximate value of £700,000".

The entire system was therefore "inoperable, meaning that Moog will be liable for the loss of energy generation and will need to procure electricity off the grid".

In addition, all of the windows at roof-level were smashed, and

some of the skylights were destroyed.

"This caused broken glass to fall into the offices and work-spaces below", with damage also caused to the front gates, metal plate ladder guard, carpets, and chairs.

It could therefore "take several weeks before the facility can become fully operational again", with employees "forced to work from home as Moog works through the cleanup process".

The direct-action campaign also had knock-on effects for Moog's contractual arrangements.

The company said it had "issues with meeting supply contracts on time, including the supply of components for ultimate use by the MoD".

It added that "there is potential reputational damage for Moog if customers conclude that Moog's ability to supply components on time... could be compromised by its susceptibility to disruption caused by unlawful protest activity".

Ultimately, Moog estimated that the total financial loss caused by the incident to be "between circa £1,250,000 to £2,000,000".

The firm reported a gross profit of almost $1bn last year.

TAGGED: Israel US

ABOUT THE AUTHOR

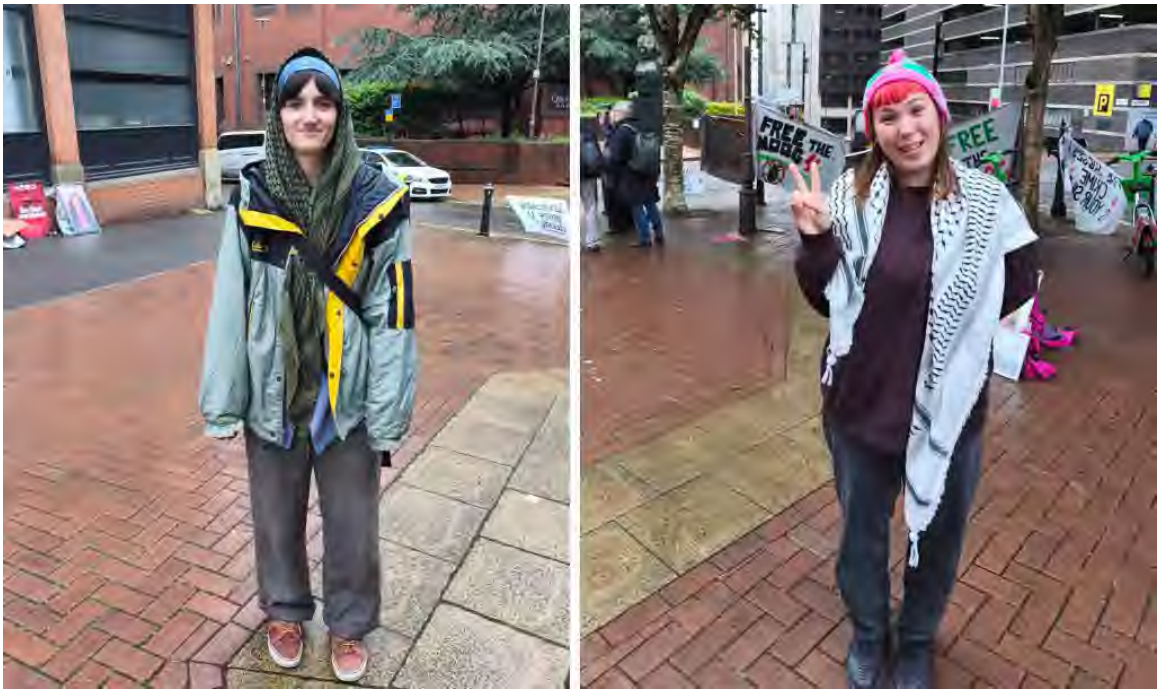
Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

'WE WANTED TO SAVE LIVES', PALESTINE ACTIVISTS TELL COURT

Jury mulls case of four protesters who raided Wolverhampton arms factory said to produce "military aircraft parts for Israel"

JOHN MCEVOY

11 JUNE 2026



Frank Sherman and Hana Yun-Stevens outside Birmingham crown court. (Photos: John McEvoy / Declassified UK)

A jury at Birmingham crown court is deliberating whether four pro-Palestine activists committed criminal damage at an arms factory in Wolverhampton.

Defendants Iain Evans, Hisham Alkhamesi, Frank Sherman, and Hana Yun-Stevens believed the factory, used by arms firm Moog, supplied weaponry to Israel.

They climbed onto the roof in August 2025, smashed equipment and unveiled a banner saying "Free Palestine" while wearing T-shirts with the names of Palestinians killed in Israeli airstrikes.

Social media posts relating to the action and shown to the jury described Moog as a manufacturer of fighter jet components which are supplied to Israel.

During the five-day trial, the defendants told the court that they had been on protests but felt unable to effect change, leading to the decision to engage in direct action.

Jurors were unable to reach a verdict this week and have been discharged until Tuesday.

One of the defendants, Sherman, who identifies as they/them, chose to give their own closing statement today rather than let a barrister advocate on their behalf.

Sherman, 23, told the jury they would always believe disrupting the factory was "not criminal" and that any repercussions they may face could not "compare to how I would feel if I had not taken action".

Lawyers for the other defendants reminded the jury of its powers – referencing the Magna Carta and the Bushell case, a landmark ruling from 1670 which established the independence of juries.

They also mentioned how the suffragettes "did a bit of smashing themselves".

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

The prosecution's lawyer noted how "there is no dispute that these defendants… believed that the business they targeted was involved in the supply chain to Israel".

But the trial, he said, "is not about Israel, it's not about Palestine… It's simply about whether they unlawfully damaged property".

The four defendants have all pleaded not guilty to criminal damage.

'The lives we would save'

During cross-examination on Tuesday, Yun-Stevens, 24, explained the concept of direct action as "going to the source of production and disrupting it, having an immediate impact".

Yun-Stevens said the primary intention in scaling Moog's roof was not to cause criminal damage but to "disrupt the factory's operation which we deemed to be criminal".

Solar panels and windows were smashed during the incident with the stated goal of slowing down the factory's production line and exposing machinery to rain damage.

Alkhamesi, 23, told the court on Tuesday that the "main intention" of the action was "to occupy the roof" because the "factory can't operate while we're on the roof".

He explained how his life had been shaped by his grandfather, Abdullah Alkhamesi, who founded the Yemeni Red Crescent in 1973.

Alkhamesi's grandfather died in 2017 because he was unable to receive healthcare in Yemen amid a military blockade imposed by Saudi Arabia.

The court also heard how Alkhamesi contributed money left to him by his grandmother to fund the direct action campaign against Moog.

Evans, who previously worked in the aerospace sector, told the court: "We believed the longer we stayed up there, the more

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

lives we would save. The idea was that the longer we stay on the roof, the longer the factory would be shut down".

He intimated at the importance of direct action with reference to the concept of "just in time" supply chains, wherein items are delivered right before they are needed in order to reduce stockpiling costs.

"Any delay in that process, if [a company] is late in delivery, that has knock on impacts because obviously they're not keeping a stockpile of parts in a warehouse", Evans said. That means "immediate impacts on the supply chain".

All of the defendants emphasised that they had been involved in Palestine marches over recent years and felt they were not making a significant enough impact on events.

Yun-Stevens noted in court how a full arms embargo has still not been imposed on Israel.

The defendants further explained how the action was taken in the early hours of a bank holiday Monday in order to prevent interaction and potential confrontation with Moog staff.

Closing statements

During closing statements today, Sherman explained that "the care that we as a group put into the direct action that we took can only be spoken of by one of us".

Sherman, who previously volunteered in support of refugees in Athens and Calais, told the court that: "The reason we are here standing trial is because we took direct action".

Direct action, said Sherman, is akin to seeing "a room is flooding because the tap is turned on and you spend time ringing people to try and get them to turn off the tap, but they are refusing to come even though you can see the damage it's causing. Direct action is turning off the tap yourself".

With reference to their co-defendants, Sherman continued: "As Iain told you, the longer we stayed up there, the more lives we

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

could save; as Hisham told you, we intended to disrupt shipments, disrupt production; and as Hana told you, we disrupted only what we deemed to be criminal".

Sherman declared: "I will always in my heart know that using care and intention to disarm the factory is not criminal".

They closed their statement by reading the poem "If I Must Die", by Palestinian author Refaat Alareer.

The other three defendants retained their legal representation for closing statements.

Representing Alkhamesi, defence counsel Mira Hammad told the court that her client was in some ways "the least likely person you could imagine to get on that roof".

As a "shy straight-A student" who "sits in the corner of the room and likes to talk about books", Alkhamesi was not the type of person who would be expected to "climb onto the roof of an arms company".

Yet there was "no mystery about why the [four defendants] were there either", said Hammad. "It wasn't for personal gain, to get anything for themselves".

The explanation, she said, "was on their T-Shirts. It's right there in the prosecution case" and "the tweet" discussing "military aircraft parts to Israel".

Defence counsel Tom Wainwright, representing Evans, emphasised the importance of jury trials and noted how they were coming under attack in the UK.

"The history of trial by jury we are not taught about in school compared with other rights and liberties", he said. "But it is marked by control being wrested away from those in power and back to the local community".

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

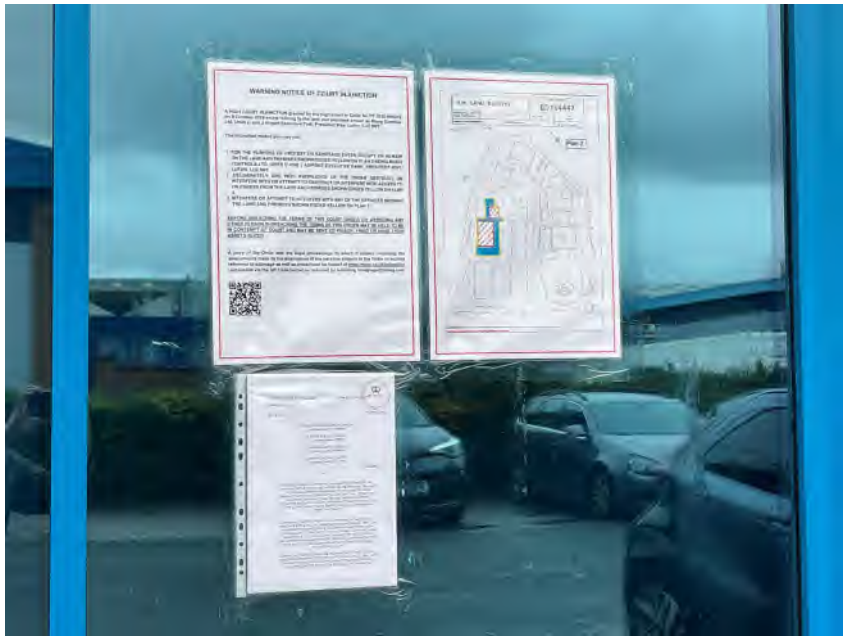






Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041







Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

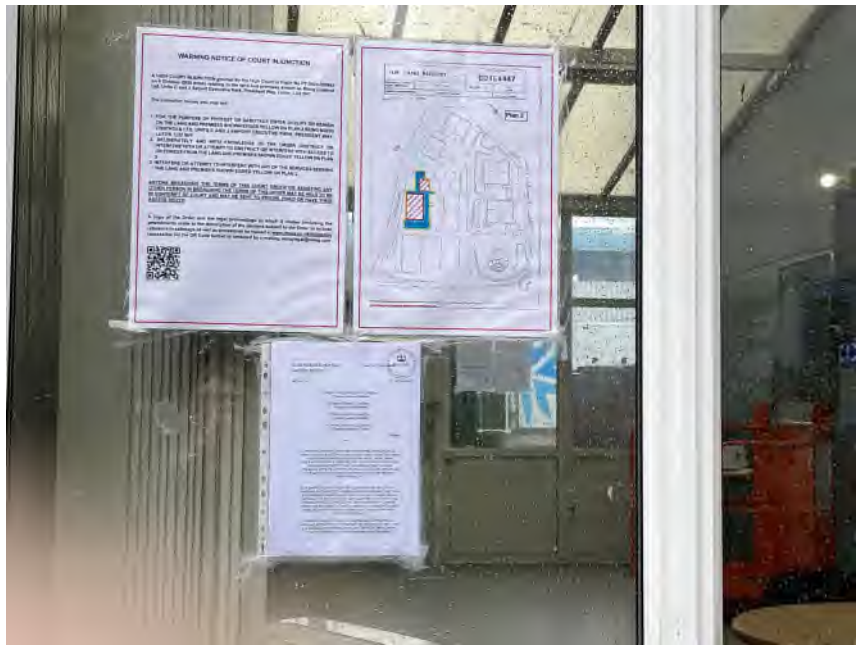






Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041







Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041







Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041







Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041







Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041







Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

Luton Signage













Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041









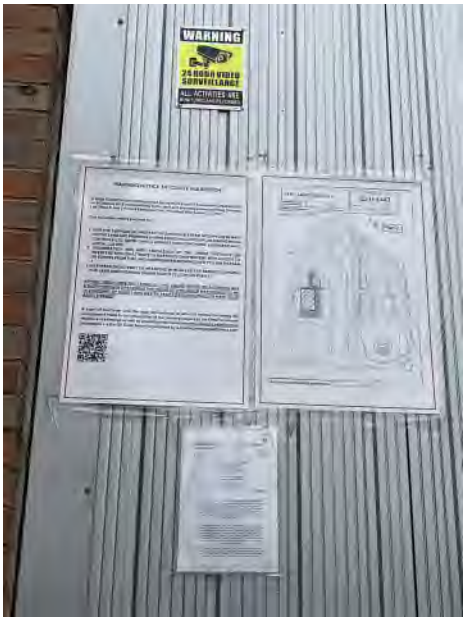




Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041













Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041










WARNING NOTICE OF COURT INJUNCTION



Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041













Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041





Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041





Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041





Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041





Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041





Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041





Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041





Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041





Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041





Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041





Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041





Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041





Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

Reading Signage



Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

Tewkesbury Signage









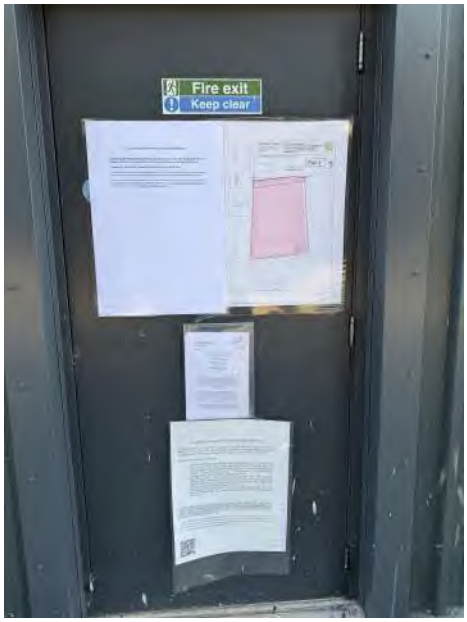




Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041









Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041





Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041







Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

Wolverhampton Signage













Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041







Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041







Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041







Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041







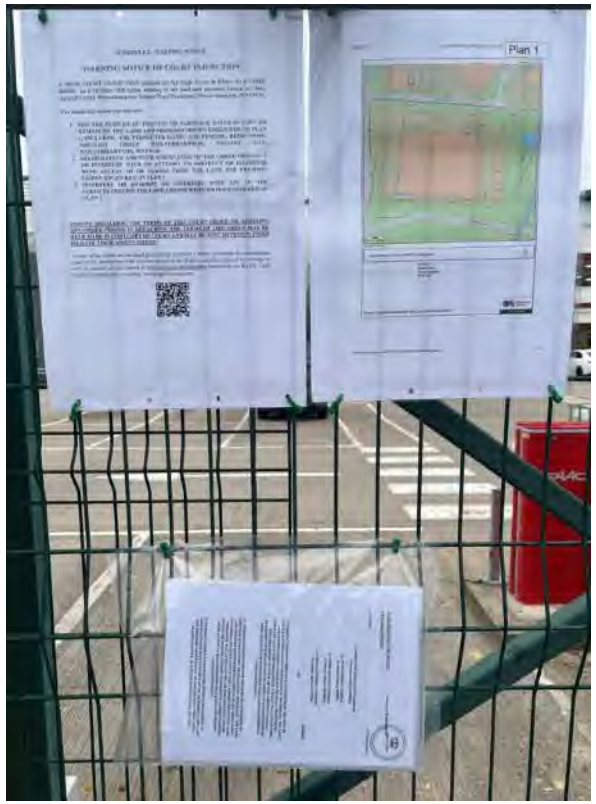
Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041







Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041







Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041







Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041







Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

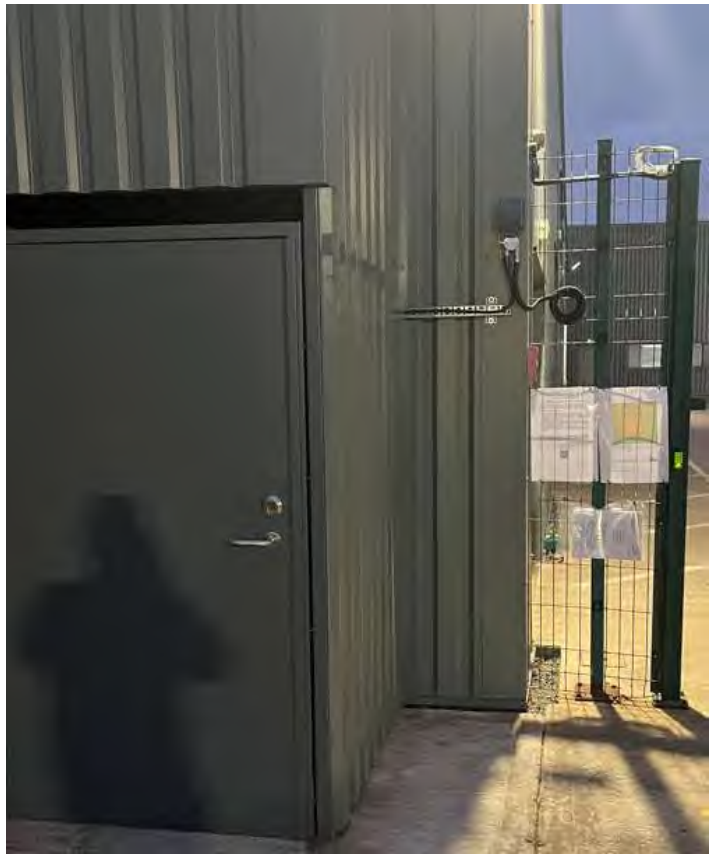






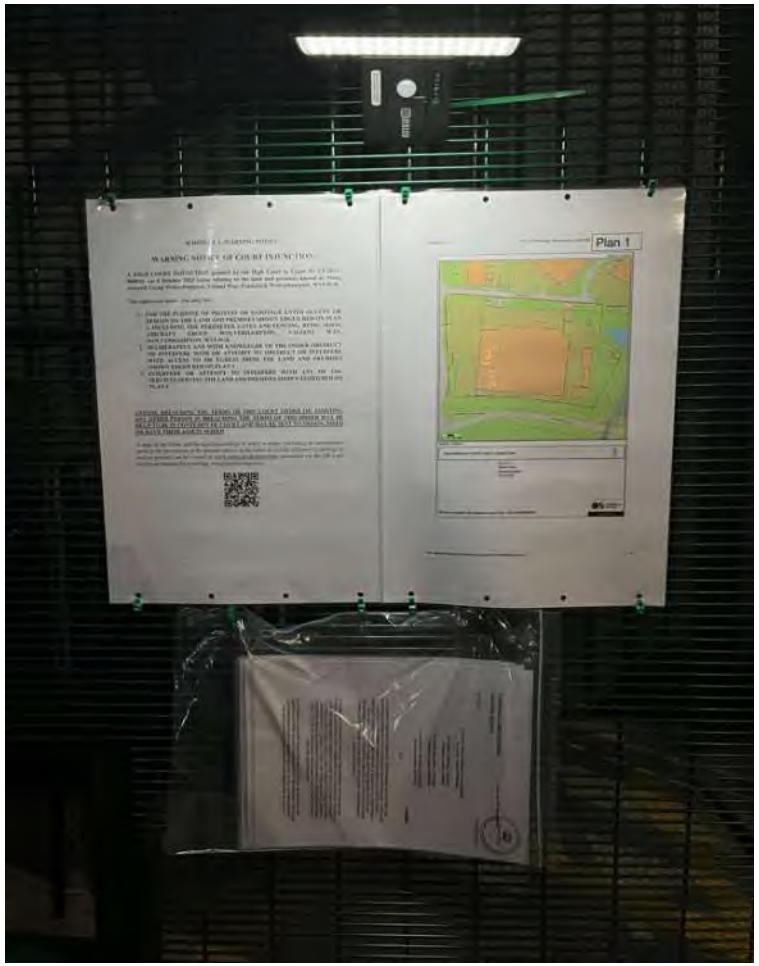
Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

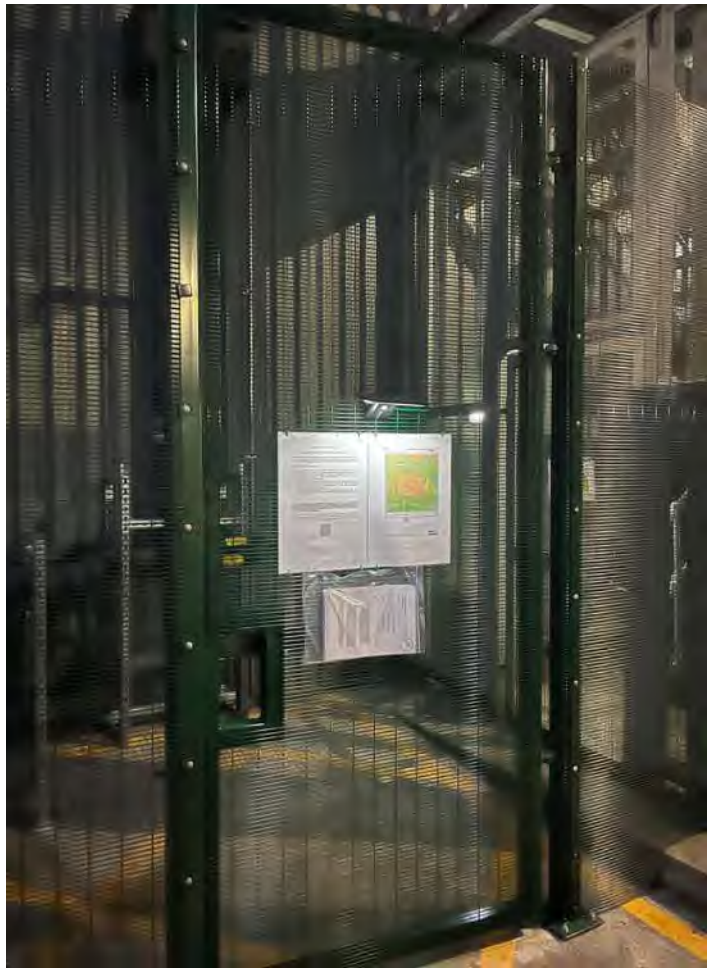






Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041







Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041



Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

MOOG

PROHIBITED PLACE

THIS IS A PROHIBITED PLACE UNDER THE NATIONAL SECURITY ACT 2023

PERSONS ENGAGING IN UNAUTHORISED ACTIVITY, AS SET OUT UNDER SECTION 4 AND 5 OF THE NATIONAL SECURITY ACT 2023, WHICH INCLUDES THE TAKING OF PHOTOGRAPHS, VIDEOS OR OTHER RECORDINGS, MAY BE ARRESTED AND PROSECUTED.

Keep clear

AUTOMATIC GATE
PLEASE STAND BACK

MOOG

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041



Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041



Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041



Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041



Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041



Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

APM
FIRE & SECURITY

24 hour CCTV in operation

HM Land Registry
Official copy of title plan

Title number GR398822
Ordinance Survey map reference SO9233SW
Scale 1:1250 enlarged from 1:2500
Administrative area Gloucestershire : Tewkesbury

Plan 5

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 PT-2025-000910 on 6 October 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 OR SABOTAGE 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. DELIBERATELY AND WITH KNOWLEDGE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 5
3. 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 (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest)can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing moogllegal@moog.com

NOTICE: APPLICATION TO LIST A REVIEW HEARING

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Industrial Group, Ashchurch Parkway, Tewkesbury, Gloucestershire, GL20 8TU

The Claimants have made a further application on 28 July 2026 to list a hearing at which the review of the injunction granted on 6 October 2025 will take place, with a time estimate of 2 ½ hours.

The Claimants' application was filed on 28 July 2026 and can be accessed online, alongside the injunction order and the legal proceedings to which it relates, at www.moog.co.uk/injunction or obtained in hard copy by e-mailing moogllegal@moog.com

Ring Main Pump Hous

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 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 OR SABOTAGE 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. DELIBERATELY AND WITH KNOWLEDGE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 5
3. INTERFERE OR ATTEMPT TO INTERFERE WITH ANY OF THE SERVICES SERVING THE LAND AND PREMISES SHOWN EGDED 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 (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest)can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com:

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 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 OR SABOTAGE 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. DELIBERATELY AND WITH KNOWLEDGE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 5
3. INTERFERE OR ATTEMPT TO INTERFERE WITH ANY OF THE SERVICES SERVING THE LAND AND PREMISES SHOWN EGDED 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 (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest)can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com:



Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

24 hour CCTV in operation

HM Land Registry
Official copy of title plan

Title number **GR395822**
Ordnance Survey map reference **SO9233SW**
Scale **1:1250 enlarged from 1:2500**
Administrative area **Gloucestershire : Tewkesbury**

Plan 5

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 PT-2025-000910 on 6 October 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 OR SABOTAGE 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. **DELIBERATELY AND WITH KNOWLEDGE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 5**
3. **INTERFERE OR ATTEMPT TO INTERFERE WITH ANY OF THE SERVICES SERVING THE LAND AND PREMISES SHOWN EGDED 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 (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest)can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com:

NOTICE: APPLICATION TO LIST A REVIEW HEARING

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Industrial Group,

Ashchurch Parkway, Tewkesbury, Gloucestershire, GL20 8TU

The Claimants have made a further application on 28 July 2026 to list a hearing at which the review of the injunction granted on 6 October 2025 will take place, with a time estimate of 2 ½ hours.

The Claimants' application was filed on 28 July 2026 and can be accessed online, alongside the injunction order and the legal proceedings to which it relates, at: www.moog.co.uk/injunction or obtained in hard copy by e-mailing mooglegal@moog.com

IN THE HIGH COURT OF JUSTICE
CHANCERY DIVISION

Claim No: PT-2025-000910

PT-2025-000910

BETWEEN:

(1) MOOG WOLVERHAMPTON LIMITED
(Company number 07000206)

(2) MOOG TERNAU LIMITED
(Company number 985057)

(3) MOOG READING LIMITED
(Company number 00963650)

(4) MOOG CONTROLS LIMITED
(Company number 01171648)

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
(FIRST DEFENDANT)

(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 LETOX, ENTEC AND 3 LIGHTS EXECUTIVE PARK, FREMDENT WAY, LETOX LL1 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
(SECOND DEFENDANT)

(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,

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

NOTICE: APPLICATION TO LIST A REVIEW HEARING

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Industrial Group,

Ashchurch Parkway, Tewkesbury, Gloucestershire, GL20 8TU

The Claimants have made a further application on 28 July 2026 to list a hearing at which the review of the injunction granted on 6 October 2025 will take place, with a time estimate of 2 ½ hours.

The Claimants' application was filed on 28 July 2026 and can be accessed online, alongside the injunction order and the legal proceedings to which it relates, at: www.moog.co.uk/injunction or obtained in hard copy by e-mailing mooglegal@moog.com

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**

Plan 5

This official copy is incomplete without the preceding notes page.

IN THE HIGH COURT OF JUSTICE
CHANCERY DIVISION

Claim No: PT-2025-000910

BETWEEN:

(1) MOOG WOLVERHAMPTON LIMITED
(Company number 970183S6)

(2) MOOG FERNAU LIMITED
(Company number 5050915)

(3) MOOG READING LIMITED
(Company number 05586585)

(4) MOOG CONTROLS LIMITED
(Company number 01171948)

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
(FIRST DEFENDANT)

(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
(SECOND DEFENDANT)

(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,

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

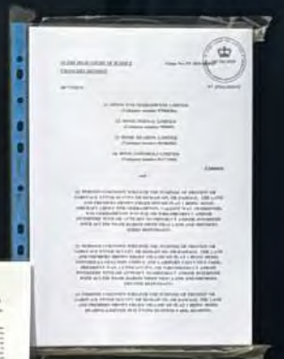
NOTICE: APPLICATION FOR RETURN DATE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000510 on 5 September 2025 exists relating to the land and premises known as Moog Industrial Group, Ashchurch Parkway, Tewkesbury, Gloucestershire, GL20 8TU

A further hearing in relation to this Order will take place at the Rolls Building, 7 Rolls Building, Fetter Lane, London, EC4A 1NL on 6 October 2025, at which the Claimants' application for continuation of the interim injunctive relief granted by the Order and a further order preventing anyone from obstructing access to or egress from the land and premises shown edged red on Plan 5 will be heard.

The Claimants' application was filed on 16 September 2025 and can be accessed online, alongside the Order and the legal proceedings to which it relates, at: www.moog.co.uk/injunction or obtained in hard copy by e-mailing moogleasell@moog.com









NOTICE: APPLICATION TO LIST A REVIEW HEARING

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000510 on 5 October 2025 exists relating to the land and premises known as Moog Industrial Group, Ashchurch Parkway, Tewkesbury, Gloucestershire, GL20 8TU

The Claimants have made a further application on 29 July 2026 to list a hearing at which the review of the Injunction granted on 6 October 2025 will take place, with a time estimate of 2 ½ hours.

The Claimants' application was filed on 29 July 2026 and can be accessed online, alongside the Injunction order and the legal proceedings to which it relates, at: www.moog.co.uk/injunction or obtained in hard copy by e-mailing moogleasell@moog.com

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

World

UK police arrest pro-Palestine activists blocking UAV Engines sit owned by Elbit

written by Anna Walter • 3 months ago • 0 comments



0

UK arrests activists who blockaded UAV Engines facility linked to Elbit Systems

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

because Elbit supplies drone engines and other systems they allege have been used in Israel's military operation Gaza. Local authorities moved in after the blockade disrupted access to the site, and arrests were confirmed by c the scene.

Police action and arrests at the facility

Officers arrived at the UAV Engines Ltd location after activists began physically blocking entry points to the com according to accounts from witnesses present during the protest. Police removed demonstrators and made seve arrests on public order and obstruction-related grounds. Authorities said their immediate priority was restoring access to the site and ensuring the safety of staff and protesters.

Media crews and local residents reported a heavy police presence while officers processed those detained, and t the surrounding area was temporarily affected. No detailed charge sheets were disclosed at the time, and police indicated investigations would determine any subsequent prosecutions.

Activists' stated reasons and demands

Participants described the blockade as part of a wider campaign to pressure companies linked to Israeli defence suppliers over the Gaza war. Activists said they believe Elbit Systems' drones and engines are being used in oper that have caused civilian harm, and they urged an end to commercial ties they view as facilitating the conflict. O framed the action as non-violent direct action aimed at disrupting production and drawing public attention.

Campaign groups highlighted UAV Engines Ltd's ownership structure as the rationale for selecting the site, poin the company's role as a subsidiary of Elbit Systems and its position in the drone supply chain. Protesters called f transparency from local authorities and companies about contracts and exports tied to the wider conflict.

Company profile and industry context

UAV Engines Ltd is a subsidiary of Elbit Systems, a major Israeli defence contractor known for producing drone e and other aerospace components. The company is regarded within the defence sector as one of the larger manu of unmanned aerial vehicle propulsion systems, supplying engines and parts to a range of customers. Its operati the UK have drawn scrutiny from campaigners who monitor arms industry links to international conflicts.

Industry analysts note that facilities involved in defence manufacturing often become focal points for protests b of their strategic role in supply chains. The presence of a subsidiary in the UK underscores how globalised defen manufacturing can attract local political actions.

Local officials and company response

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

UAV Engines Ltd and Elbit Systems did not issue an immediate public statement on the arrests in the material a during the protest. Companies in similar incidents commonly point to legal channels for grievances and reiterat compliance with export controls and regulations, while stressing the importance of protecting staff and facilitie

Legal and safety implications of the blockade

Legal experts say blockades that restrict access to private industrial sites can attract criminal charges including obstruction or public order offences, depending on the tactics used and the level of disruption caused. Police enforcement can lead to prosecutions, but outcomes vary with evidence, intent and whether occupiers accept li Civil litigation is also a potential avenue for companies seeking to recover costs related to disruption.

Safety concerns are frequently cited by authorities when protesters gather at industrial sites, particularly those heavy machinery or hazardous materials. Both police and organisers typically point to the need for clear commu to prevent risks to demonstrators, workers and emergency services.

Protest movement and potential next steps

Campaign groups said the action at the UAV Engines facility was one in a series of targeted demonstrations plan around defence industry sites and financial institutions tied to arms suppliers. Organisers indicated that furthe could occur unless they observed policy changes or greater scrutiny of contracts connected to the Gaza conflict. movement has sought to combine public demonstrations with calls for parliamentary inquiries and corporate transparency.

Observers said the arrests could galvanise supporters and attract wider attention, while also prompting debate local stakeholders about the merits and limits of direct action. Authorities have signalled they will monitor forth events closely and apply proportionate responses to maintain order.

The arrests at the UAV Engines Ltd site underscore a recurring flashpoint where international conflict, domestic and defence industry operations intersect, and they leave unanswered questions about how companies, authori campaigners will navigate disputes tied to arms supply chains.

ACTIVISTS ARREST BLOCKING ELBIT ENGINES OWNED POLICE PROPALESTINE SITE

0

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

Nine arrested after protest at drone factory



Staffordshire Police was called to UAV Engines, a subsidiary of Elbit Systems, in Shenstone on Monday

22 September 2026

Nine people opposed to Israel's military action in Gaza have been arrested after a protest at a drone factory.

Police were called to UAV Engines, a subsidiary of Israeli firm Elbit Systems, in Shenstone, Staffordshire, at 06:40 BST on Monday.

Four people were held on suspicion of the charge of "lock on to person/object/land to cause serious disruption". They are two men aged 57

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

and 73 from the Stroud area of Gloucestershire; a 39-year-old woman of no fixed address; and a 77-year-old man from the Bolton area.

A man, 55, of no fixed address, was arrested on suspicion of wilful obstruction on a highway. Four others were questioned on suspicion of both offences, Staffordshire Police said.

They are a 74-year-old woman from Powys, mid Wales; a 63-year-old woman from the Radstock area in Somerset, a 30-year-old woman from Basildon, Essex; and a 24-year-old woman from London.

The police force said protest activity in the area had finished and inquiries were continuing.

Get in touch

Tell us which stories we should cover in Staffordshire

Contact form

*Follow BBC Stoke & Staffordshire on **BBC Sounds**, **Facebook**, **X** and **Instagram**.*

Related topics

Shenstone

Related internet links

Staffordshire Police

From other local news sites

Crewe's Cumberland Arena set to reopen after major 'transformation'

Crewe Nub News

Weekend weather forecast for Biddulph - 2 Oct to 4 Oct

Biddulph Nub News

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

People Against Genocide abseil into UAV Tactical Systems factory in Leicester

by The Canary — 24 April 2026 in Global, News, UK Reading Time: 2 mins read

254 8 AA 0

Share on Facebook Share on Twitter Share on Bluesky Share via WhatsApp Share via Telegram

Share on Threads

From approximately 3am on Friday 24 April, People Against Genocide began occupying the roof of the Leicester factory of UAV Tactical Systems. Elbit Systems, Israel's biggest weapons maker, owns the company. UAV Tactical Systems produces drones for the Israeli military's killer drone fleet, of which Elbit supplies over 85%.

Then at approximately 10am, an action taker from the group occupying the roof abseiled into the factory through a hole made with power tools. Whilst abseiling into the weapons factory, the action taker proceeded to damage the ceiling and air supply to the clean room.

The clean room is used to make essential components for Israeli military drones and, once contaminated, it could be out of use for several months.

Discover more News subscription service Political news analysis Online newspaper subscription Digital news archive Newspapers Politics (Left)

The action involved four people from direct action group People Against Genocide. They successfully evaded recently-increased security patrols at the plant, and used 10m extension ladders to ascend over razor-wire fencing, gaining access to the factory roof. The team next began to use high-grade power tools to cut their way through the roof, to damage weaponry inside.

UAV Tactical Systems was originally a joint venture between Elbit and French arms giant Thales. But since January 2026, the Israeli weapons firm has owned the company entirely.

Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

the World Central Kitchen in April 2024.

The UAV Tactical Systems plant has been the scene of numerous protests and actions over the years.


In Japan, nobody scrubs the chopping boa
this instead (genius!)
WellnessJournal365

On today's action, a spokesperson for People Against Genocide said:

> *Israel continues to slaughter people across West Asia, with weapons manufactured in the UK. We cannot stand idly by while Elbit continues to manufacture death and destruction here in Leicester.*
>
> *Petitions, protests and lobbying decision makers who are actively involved in the Gaza genocide, has unsurprisingly, failed to create necessary change. Therefore, rather than appeal to politicians or the government, we're bypassing the complicit decision makers and are taking direct action to shut Elbit down and disrupt the murderous Israeli war machine ourselves.*
>
> *Elbit Systems markets its drones as "battle-tested" on Palestinians, and uses them to commit genocide in Palestine and to slaughter people across the region. For the people murdered by Elbit's weaponry and for those whose lives are threatened everyday by Israeli military drones, today, we have shut Elbit down.*

Featured image supplied

Tags: israel militarism protest

Share 194 Tweet 122 Share Send Share Share

Previous Post

Three Palestinians murdered in just over 24 hours by illegal Israeli settlers in occupied West Bank

Next Post

Contractor for Bibby Stockholm asylum barge overcharged government by £118m



Docusign Envelope ID: 283E7756-3806-85B3-83E8-8D06501C7041

Pro-Palestinian activists protest arms factories in West London

Licensable picture: Wednesday, 25th March 2026, 12:48 GMT

ANADOLU AGENCY



LONDON, UNITED KINGDOM - MARCH 25: Pro-Palestinian activists stage a demonstration in front of Attewell headquarters in the Hayes district of West London on March 25, 2026, as part of the 'Arms Factory Protests - Day of Action.' Protesters targeted companies allegedly involved in the supply chain for Israeli military equipment, calling for an immediate halt to arms sales and a comprehensive embargo on military electronic components and fighter jet parts. Rasid Necati Aslim / AnadoluNo Use USA No use UK No use Canada No use France No use Japan No use Italy No use Australia No use Spain No use Belgium No use Korea No use South Africa No use Hong Kong No use New Zealand No use Turkey

Select a license for the Image:

Popular licenses

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

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

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

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.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

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).

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

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

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

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

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

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.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

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

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

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

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

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 Signed by: ……
92C7F87347624E7...
Elwira Kelly

DATED this 3rd day of November 2026.

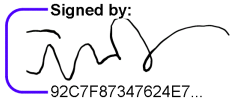
Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

On behalf of Claimant
E Kelly: 6th
Date: 3 November 2026
Exhibit "EK6"

Claim no: PT-2025-000910

IN THE HIGH COURT OF JUSTICE
BUSINESS AND PROPERTY DIVISION

EXHIBIT EK6

Signed: 

Name: Elwira Kelly
Position: Senior Vice President, General Counsel and Corporate Secretary
Date: 3 November 2026

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

HIGH COURT OF JUSTICE
03 Sept 2026
THE BUSINESS & PROPERTY COURTS OF ENGLAND & WALES
PT-2025-000910

IN THE HIGH COURT OF JUSTICE **Claim No: PT-2025-000910**

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

PROPERTY, TRUSTS AND PROBATE LIST (ChD)

Master McQuail

3 September 2026

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 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 (FIRST DEFENDANT)

(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 (SECOND DEFENDANT)

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

(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 (THIRD DEFENDANT)

(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 (FOURTH DEFENDANT)

(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 (FIFTH DEFENDANT)

Defendants

ORDER

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

AND UPON injunctive relief having been granted against Persons Unknown (the First to Fifth Defendants as more particularly described above) by the Honourable Mr Justice Thompsell on 6 October 2025 (the "**Injunction Order"**)

AND UPON the Court reading the fourth witness statement of Elwira Kelly dated 28 July 2026 explaining the Claimants' intention to apply to court to review the Injunction Order as provided for by Paragraph 7 of the Injunction Order (the **"Review Application"**) and to add Hanah Yun Stevens, Bea Sherman (also known as Frank Sherman), Iain Evans, and Hisham Alkhamesi as

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

sixth, seventh, eighth and ninth Defendants (respectively) (the **"Named Defendants"**) to the Claim and to make consequent amendments to the Re-Amended Claim Form and Re-Amended Particulars of Claim (the **"Proposed Application"**)

AND UPON the Claimants having applied by Application Notice dated 28 July 2026 for permission to serve the Proposed Application, the Review Application and other documents in the Claim on the Named Defendants by an alternative method or at any alternative place pursuant to CPR r.6.27 and r.6.15 for the reasons explained in the Fourth Witness Statement of Elwira Kelly dated 28 July 2026

IT IS ORDERED THAT:

1. Pursuant to CPR 6.27, the Claimants have permission to serve the Proposed Application, the Review Application and all evidence in support of the Review Application, together with this Order, the Application dated 28 July 2026, the Fourth Witness Statement of Elwira Kelly dated 28 July 2026, and all other documents previously filed by the Claimants in these proceedings on the Named Defendants, by:

   (i) 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 this Order; and

   (ii) Uploading a copy of those documents (omitting Schedule 1 of this Order) to the following website: www.moog.co.uk/injunction; and

   (iii) Upon making the Review Application, by placing signs at prominent locations on the perimeter of the Sites shown edged red on Plans 1, 4, and 5, and edged yellow on Plans 2 and 3 at Schedule 2 of the Injunction Order which advises that the Proposed Application and the Review Application have been made and provides a weblink and QR code by which the website or webpage mentioned in paragraph 1(ii) above can be accessed (the **"Signs"**).

   (iv) Alternatively, 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.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

(v) Alternatively, by serving any solicitor acting for a Named Defendant who has filed a notice of acting in these proceedings.

2. Effective service of the Proposed Application, this Order, the Application dated 28 July 2026, the Fourth Witness Statement of Elwira Kelly dated 28 July 2026, and all documents previously filed in this Claim will be deemed to have taken place on the date for each of the Defendants on which all the relevant steps in Paragraphs 1(i) and (ii) (alternatively Paragraphs 1(iv) or (v)) have been carried out. Effective service of the Review Application and evidence in support of the Review Application will be deemed to have taken place on the date for each of the Defendants on which all the relevant steps in Paragraph 1 have been carried out.

3. For the avoidance of doubt, in respect of the steps referred to at Paragraph 1(iii), effective service will be deemed to have taken place when the Signs have all been first affixed regardless of whether they are subsequently removed.

4. For the purposes of Paragraph 1(iii), "prominent location" in relation to each Site has the same meaning as in Paragraph 14 of the Injunction Order.

5. The Claimants shall serve this Order, the Application dated 28 July 2026 and the Fourth Witness Statement of Elwira Kelly on the Named Defendants on the terms set out in this Order.

6. The Named Defendants may apply to have this Order set aside or varied, pursuant to CPR r.23.10.

COSTS

7. Costs reserved.

SERVICE

8. The court has provided a sealed copy of this Order to the serving party at mooglegal@moog.com.

COMMUNICATIONS WITH THE CLAIMANTS

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

9. The Claimants' contact details are:

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

(2) mooglegal@moog.com.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

SCHEDULE 1 – NAMED DEFENDANTS' ADDRESSES



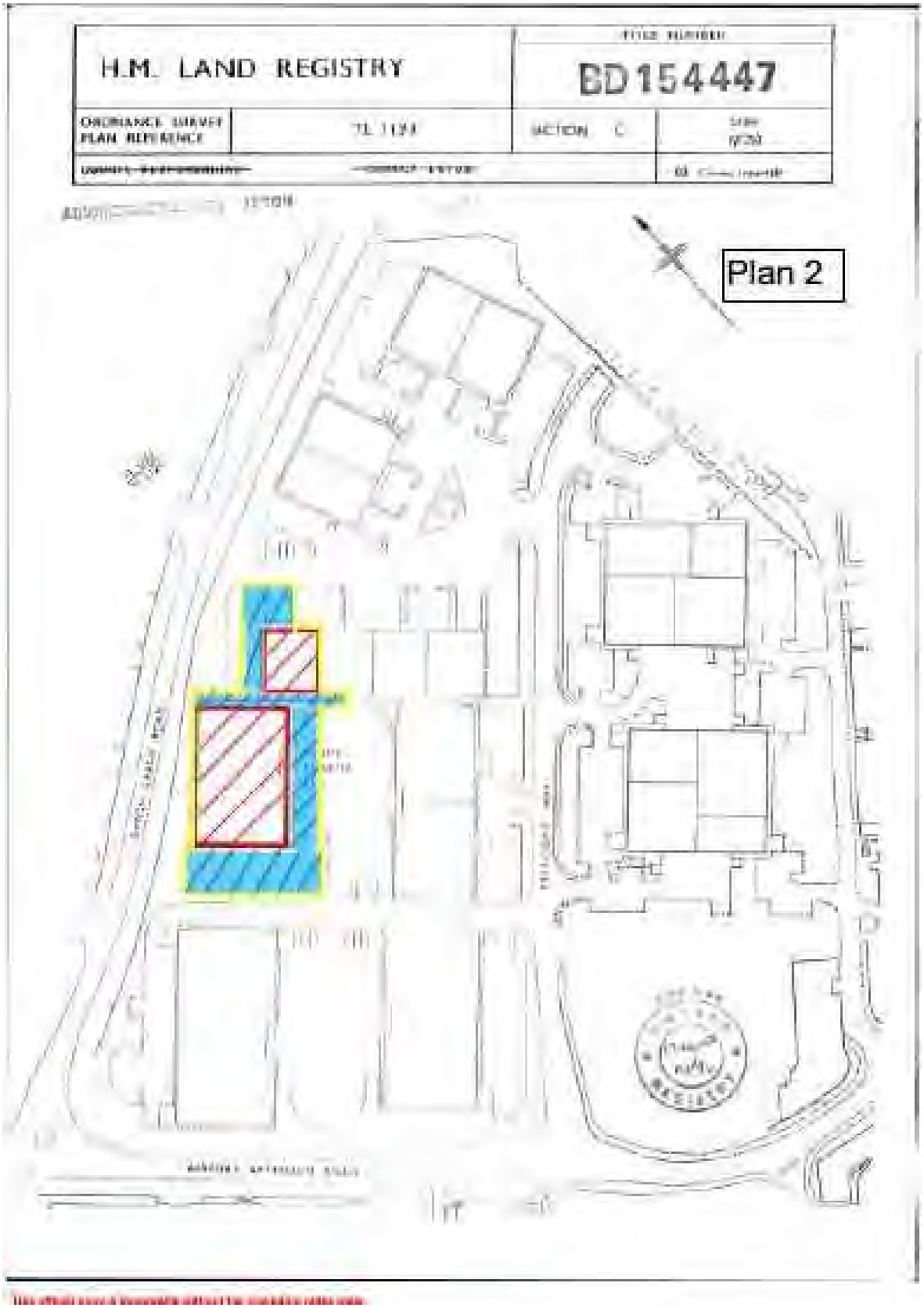
Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

SCHEDULE 2 – PLANS

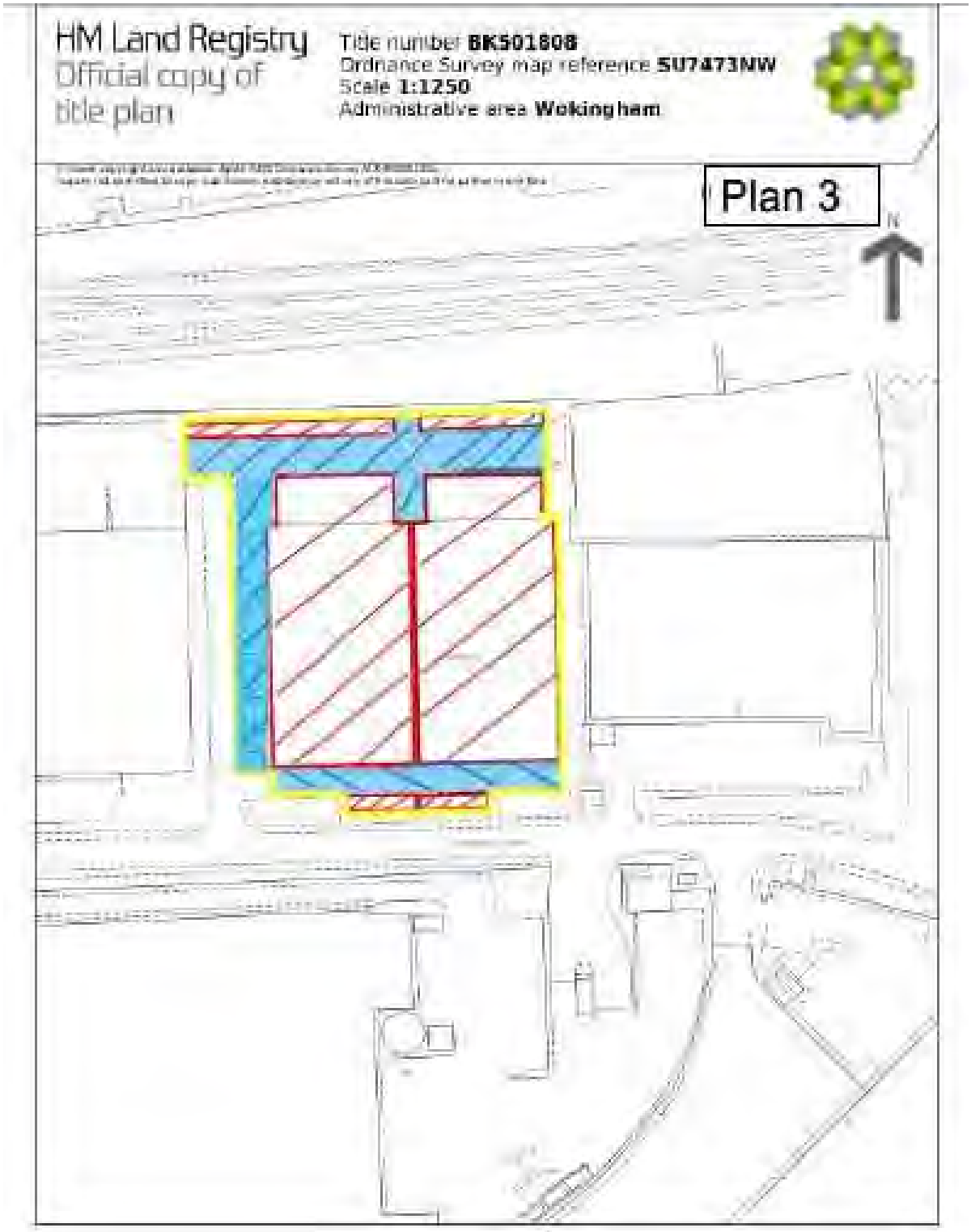
Plan 1



Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE



Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE



This official copy is incomplete without the preceding notes page.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

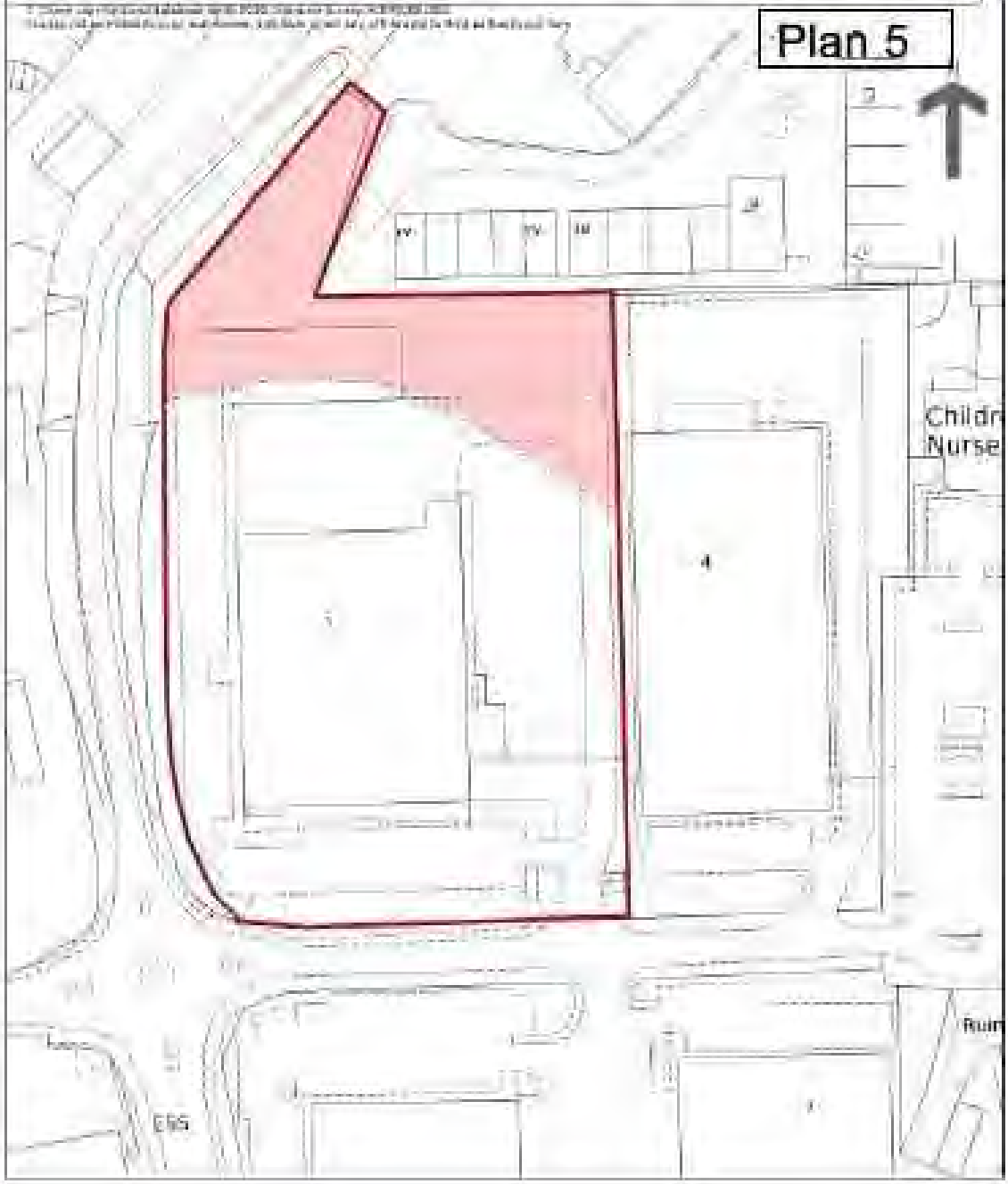


Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

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**

Plan 5



Title official copy is incomplete without the preceding notes page.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

IN THE HIGH COURT OF JUSTICE **Claim No. PT-2025-000910**
BUSINESS AND PROPERTY DIVISON

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

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

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

BUNDLE

Pagination of this bundle is in red. All other pagination is internal to that document.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

TAB NO.	DOCUMENT	DATE	PAGE NO.
SECTION A: THE JOINDER APPLICATION			
1.	Claimant's Application Notice dated	2 October 2026	1
2.	Draft Amended Claim Form	2 October 2026	13
3.	Draft amended Particulars of Claim		22
4.	Draft Order		34
5.	The Fifth Witness Statement of Elwira Kelly	2 October 2026	63
6.	Exhibit EK5		80
SECTION B: THE REVIEW APPLICATION			
7.	Claimant's Application Notice	28 July 2026	241
8.	Notice of Hearing	12 August 2026	280
Section C: THE ALTERNATIVE MEANS ORDER			
9.	Claimant's Application Notice	28 July 2026	281
10.	Fourth Witness Statement of Elwira Kelly	28 July 2026	293
11.	Exhibit EK4	28 July 2026	300
12.	Alternative Means Order	3 September 2026	338
SECTION D: CHRONOLOGICAL RUN OF PREVIOUS DOCUMENTS IN THESE PROCEEDINGS			
13.	Claim Form	4 September 2025	349
14.	Application Notice	4 September 2025	353

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

15.	First Witness Statement of Elwira Kelly	4 September 2025	365
16.	Exhibit EK1	4 September 2025	393
17.	Second Witness Statement of Elwira Kelly	5 September 2025	633
18.	Exhibit EK2	5 September 2025	636
19.	Order of Mr Justice Meade	5 September 2025	658
20.	Amended Particulars of Claim	5 September 2025	684
21.	Claimant's Skeleton Argument	5 September 2025	9
22.	Application Notice	15 September 2025	696
23.	Third Witness Statement of Elwira Kelly	1 October 2025	703
24.	Exhibit EK3	1 October 2025	713
25.	Application Notice	1 October 2025	764
26.	Order	6 October 2025	771
27.	Claimant's Skeleton Argument	6 October 2025	9
28.	Re-Amended Particulars of Claim	7 October 2025	9
29.	Amended Claim Form	22 October 2025	798

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Moog Inc.
400 Jamison Rd. • East Aurora, NY 14052-0018
Telephone: +1-716 652-2000

MOOG

BY HAND AND FIRST CLASS POST

Bea Sherman (also known as Frank Sherman)
[redacted]

Dear Bea Sherman,

IN THE HIGH COURT OF JUSTICE, BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES, PROPERTY, TRUSTS AND PROBATE LIST (ChD)

CLAIM NO. PT-2025-000910

(1) MOOG WOLVERHAMPTON LIMITED AND OTHERS v (1) PERSONS UNKNOWN AND OTHERS

We are the Claimants in the above civil proceedings.

We are writing to you because the Claimants intend to apply to join you to these proceedings as a defendant pursuant to Part 19 of the Civil Procedure Rules, for the reasons explained below. This letter, and the documents enclosed with it, are served on you pursuant to an order of Master McQuail dated 3 September 2026 (the **"Alternative Means Order"**), a copy of which is enclosed, by way of service.

Background

On 6 October 2025, the Claimants were granted an injunction over five sites operated by the Claimants (the **"Sites"**), on the terms of an order of the Honourable Mr Justice Thompsell dated 6 October 2025 (the **"Injunction Order"**). The Injunction Order was granted against Persons Unknown and provides, at paragraph 7, for the injunction to be reviewed annually.

The Claimants have applied to Court for a review of the injunction (the **"Review Application"**). A hearing of the Review Application has been listed in a three-day window from 18 November 2026 onwards. Alongside the Review Application, the Claimants have also applied: (i) to join you, together with three other named individuals, to the Claim as defendants pursuant to CPR 19.2; and (ii) to make consequential amendments to the Claimants' Re-Amended Claim Form and Re-Amended Particulars of Claim; and (iv) if required in addition to the Review Application, to formally review the Injunction Order (the "**Joinder Application"**).

The Alternative Means Order permits the Claimants to serve the Joinder Application, the Review Application and the other documents referred to in that Order on you by alternative means, including by posting those documents to you at this address and by uploading them to the website referred to below. This letter, together with the documents enclosed with it and listed below, constitutes service by post pursuant to paragraph 1(i) of the Alternative Means Order.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Enclosed documents

In accordance with paragraph 5 of the Alternative Means Order, we enclose:

The Joinder Application

a) The application documents for the Joinder Application, namely:

i. The Claimants' application notice dated 2nd October 2026;

ii. The draft amended Claim Form and draft amended Particulars of Claim;

iii. The draft order; and

iv. The fifth witness statement of Elwira Kelly dated 2nd October 2026 and its exhibit.

The Review Application

b) The application documents for the Review Application, namely:

i. The Claimants' application notice dated 28 July 2026; and

ii. Notice of Hearing.

The Alternative Means Order

c) The application documents for the Alternative Means Order, namely:

i. the Claimants' Application Notice dated 28 July 2026;

ii. the accompanying Fourth Witness Statement of Elwira Kelly dated 28 July 2026 and its exhibit; and

iii. the Alternative Means Order dated 3 September 2026.

For completeness, we also include all other documents previously filed by the Claimants in these proceedings.

Further documents relevant to the injunction

Pursuant to paragraph 1(ii) of the Alternative Means Order, the documents referred to above (other than Schedule 1 to the Alternative Means Order, which contains the postal addresses of the Named Defendants) have also been uploaded to the following website: www.moog.co.uk/injunction.

That website also contains documents which are relevant to the injunction and the underlying proceedings, and which you may also wish to review at this stage.

Right to apply

You are entitled to apply to the Court to set aside or vary the Alternative Means Order, pursuant to CPR r.23.10. You may also wish to seek your own independent legal advice in relation to these proceedings and the matters referred to in this letter.

Hearing Date

The exact date within the three-day window on which the Review Hearing will be heard has not yet been confirmed by the Court. Once confirmed, this information will be available via HM Courts & Tribunals Service's published court listings for the Business and Property Division at https://www.court-tribunal-hearings.service.gov.uk/summary-of-publications?locationId=111.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Alternatively, if you provide us with an email address, we will notify you of the specific hearing date as soon as we are informed of it by the Court.

Service of further evidence

Please note that, pursuant to paragraph 7 of the Injunction Order, the Claimants are permitted to file and serve any evidence in support 14 days before the Review Hearing. We may therefore serve further evidence on you in advance of the Review Hearing.

If you wish to be served by email or if you instruct a solicitor to act for you in these proceedings, please provide the relevant details to us at mooglegal@moog.com and we will arrange for future documents to be served accordingly, in accordance with paragraph 1(iv) and (v) of the Alternative Means Order.

Yours sincerely,

Moog Inc.

Encs.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Moog Inc.
400 Jamison Rd. • East Aurora, NY 14052-0018
Telephone: +1-716 652-2000

MOOG

BY HAND AND FIRST CLASS POST

Hanah Yun Stevens
[redacted]

Dear Hannah Yun Stevens,

IN THE HIGH COURT OF JUSTICE, BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES, PROPERTY, TRUSTS AND PROBATE LIST (ChD)

CLAIM NO. PT-2025-000910

(1) MOOG WOLVERHAMPTON LIMITED AND OTHERS v (1) PERSONS UNKNOWN AND OTHERS

We are the Claimants in the above civil proceedings.

We are writing to you because the Claimants intend to apply to join you to these proceedings as a defendant pursuant to Part 19 of the Civil Procedure Rules, for the reasons explained below. This letter, and the documents enclosed with it, are served on you pursuant to an order of Master McQuail dated 3 September 2026 (the **"Alternative Means Order"**), a copy of which is enclosed, by way of service.

Background

On 6 October 2025, the Claimants were granted an injunction over five sites operated by the Claimants (the **"Sites"**), on the terms of an order of the Honourable Mr Justice Thompsell dated 6 October 2025 (the **"Injunction Order"**). The Injunction Order was granted against Persons Unknown and provides, at paragraph 7, for the injunction to be reviewed annually.

The Claimants have applied to Court for a review of the injunction (the **"Review Application"**). A hearing of the Review Application has been listed in a three-day window from 18 November 2026 onwards. Alongside the Review Application, the Claimants have also applied: (i) to join you, together with three other named individuals, to the Claim as defendants pursuant to CPR 19.2; and (ii) to make consequential amendments to the Claimants' Re-Amended Claim Form and Re-Amended Particulars of Claim; and (iv) if required in addition to the Review Application, to formally review the Injunction Order (the "**Joinder Application"**).

The Alternative Means Order permits the Claimants to serve the Joinder Application, the Review Application and the other documents referred to in that Order on you by alternative means, including by posting those documents to you at this address and by uploading them to the website referred to below. This letter, together with the documents enclosed with it and listed below, constitutes service by post pursuant to paragraph 1(i) of the Alternative Means Order.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Enclosed documents

In accordance with paragraph 5 of the Alternative Means Order, we enclose:

The Joinder Application

a) The application documents for the Joinder Application, namely:

i. The Claimants' application notice dated 2nd October 2026;

ii. The draft amended Claim Form and draft amended Particulars of Claim;

iii. The draft order; and

iv. The fifth witness statement of Elwira Kelly dated 2nd October 2026 and its exhibit.

The Review Application

b) The application documents for the Review Application, namely:

i. The Claimants' application notice dated 28 July 2026; and

ii. Notice of Hearing.

The Alternative Means Order

c) The application documents for the Alternative Means Order, namely:

i. the Claimants' Application Notice dated 28 July 2026;

ii. the accompanying Fourth Witness Statement of Elwira Kelly dated 28 July 2026 and its exhibit; and

iii. the Alternative Means Order dated 3 September 2026.

For completeness, we also include all other documents previously filed by the Claimants in these proceedings.

Further documents relevant to the injunction

Pursuant to paragraph 1(ii) of the Alternative Means Order, the documents referred to above (other than Schedule 1 to the Alternative Means Order, which contains the postal addresses of the Named Defendants) have also been uploaded to the following website: www.moog.co.uk/injunction.

That website also contains documents which are relevant to the injunction and the underlying proceedings, and which you may also wish to review at this stage.

Right to apply

You are entitled to apply to the Court to set aside or vary the Alternative Means Order, pursuant to CPR r.23.10. You may also wish to seek your own independent legal advice in relation to these proceedings and the matters referred to in this letter.

Hearing Date

The exact date within the three-day window on which the Review Hearing will be heard has not yet been confirmed by the Court. Once confirmed, this information will be available via HM Courts & Tribunals Service's published court listings for the Business and Property Division at https://www.court-tribunal-hearings.service.gov.uk/summary-of-publications?locationId=111.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Alternatively, if you provide us with an email address, we will notify you of the specific hearing date as soon as we are informed of it by the Court.

Service of further evidence

Please note that, pursuant to paragraph 7 of the Injunction Order, the Claimants are permitted to file and serve any evidence in support 14 days before the Review Hearing. We may therefore serve further evidence on you in advance of the Review Hearing.

If you wish to be served by email or if you instruct a solicitor to act for you in these proceedings, please provide the relevant details to us at mooglegal@moog.com and we will arrange for future documents to be served accordingly, in accordance with paragraph 1(iv) and (v) of the Alternative Means Order.

Yours sincerely,

Moog Inc.

Encs.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Moog Inc.
400 Jamison Rd. • East Aurora, NY 14052-0018
Telephone: +1-716 652-2000

MOOG

BY HAND AND FIRST CLASS POST

Hisham Alkhamesi
[redacted]

Dear Hisham Alkhamesi,

IN THE HIGH COURT OF JUSTICE, BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES, PROPERTY, TRUSTS AND PROBATE LIST (ChD)

CLAIM NO. PT-2025-000910

(1) MOOG WOLVERHAMPTON LIMITED AND OTHERS v (1) PERSONS UNKNOWN AND OTHERS

We are the Claimants in the above civil proceedings.

We are writing to you because the Claimants intend to apply to join you to these proceedings as a defendant pursuant to Part 19 of the Civil Procedure Rules, for the reasons explained below. This letter, and the documents enclosed with it, are served on you pursuant to an order of Master McQuail dated 3 September 2026 (the **"Alternative Means Order"**), a copy of which is enclosed, by way of service.

Background

On 6 October 2025, the Claimants were granted an injunction over five sites operated by the Claimants (the **"Sites"**), on the terms of an order of the Honourable Mr Justice Thompsell dated 6 October 2025 (the **"Injunction Order"**). The Injunction Order was granted against Persons Unknown and provides, at paragraph 7, for the injunction to be reviewed annually.

The Claimants have applied to Court for a review of the injunction (the **"Review Application"**). A hearing of the Review Application has been listed in a three-day window from 18 November 2026 onwards. Alongside the Review Application, the Claimants have also applied: (i) to join you, together with three other named individuals, to the Claim as defendants pursuant to CPR 19.2; and (ii) to make consequential amendments to the Claimants' Re-Amended Claim Form and Re-Amended Particulars of Claim; and (iv) if required in addition to the Review Application, to formally review the Injunction Order (the "**Joinder Application"**).

The Alternative Means Order permits the Claimants to serve the Joinder Application, the Review Application and the other documents referred to in that Order on you by alternative means, including by posting those documents to you at this address and by uploading them to the website referred to below. This letter, together with the documents enclosed with it and listed below, constitutes service by post pursuant to paragraph 1(i) of the Alternative Means Order.

Enclosed documents

In accordance with paragraph 5 of the Alternative Means Order, we enclose:

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

The Joinder Application

a) The application documents for the Joinder Application, namely:

i. The Claimants' application notice dated 2nd October 2026;

ii. The draft amended Claim Form and draft amended Particulars of Claim;

iii. The draft order; and

iv. The fifth witness statement of Elwira Kelly dated 2nd October 2026 and its exhibit.

The Review Application

b) The application documents for the Review Application, namely:

i. The Claimants' application notice dated 28 July 2026; and

ii. Notice of Hearing.

The Alternative Means Order

c) The application documents for the Alternative Means Order, namely:

i. the Claimants' Application Notice dated 28 July 2026;

ii. the accompanying Fourth Witness Statement of Elwira Kelly dated 28 July 2026 and its exhibit; and

iii. the Alternative Means Order dated 3 September 2026.

For completeness, we also include all other documents previously filed by the Claimants in these proceedings.

Further documents relevant to the injunction

Pursuant to paragraph 1(ii) of the Alternative Means Order, the documents referred to above (other than Schedule 1 to the Alternative Means Order, which contains the postal addresses of the Named Defendants) have also been uploaded to the following website: www.moog.co.uk/injunction.

That website also contains documents which are relevant to the injunction and the underlying proceedings, and which you may also wish to review at this stage.

Right to apply

You are entitled to apply to the Court to set aside or vary the Alternative Means Order, pursuant to CPR r.23.10. You may also wish to seek your own independent legal advice in relation to these proceedings and the matters referred to in this letter.

Hearing Date

The exact date within the three-day window on which the Review Hearing will be heard has not yet been confirmed by the Court. Once confirmed, this information will be available via HM Courts & Tribunals Service's published court listings for the Business and Property Division at https://www.court-tribunal-hearings.service.gov.uk/summary-of-publications?locationId=111.

Alternatively, if you provide us with an email address, we will notify you of the specific hearing date as soon as we are informed of it by the Court.

Service of further evidence

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Please note that, pursuant to paragraph 7 of the Injunction Order, the Claimants are permitted to file and serve any evidence in support 14 days before the Review Hearing. We may therefore serve further evidence on you in advance of the Review Hearing.

If you wish to be served by email or if you instruct a solicitor to act for you in these proceedings, please provide the relevant details to us at mooglegal@moog.com and we will arrange for future documents to be served accordingly, in accordance with paragraph 1(iv) and (v) of the Alternative Means Order.

Yours sincerely,

Moog Inc.

Encs.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Moog Inc.
400 Jamison Rd. • East Aurora, NY 14052-0018
Telephone: +1-716 652-2000

MOOG

BY HAND AND FIRST CLASS POST

Iain Evans
[redacted]

Dear Iain Evans,

IN THE HIGH COURT OF JUSTICE, BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES, PROPERTY, TRUSTS AND PROBATE LIST (ChD)

CLAIM NO. PT-2025-000910

(1) MOOG WOLVERHAMPTON LIMITED AND OTHERS v (1) PERSONS UNKNOWN AND OTHERS

We are the Claimants in the above civil proceedings.

We are writing to you because the Claimants intend to apply to join you to these proceedings as a defendant pursuant to Part 19 of the Civil Procedure Rules, for the reasons explained below. This letter, and the documents enclosed with it, are served on you pursuant to an order of Master McQuail dated 3 September 2026 (the **"Alternative Means Order"**), a copy of which is enclosed, by way of service.

Background

On 6 October 2025, the Claimants were granted an injunction over five sites operated by the Claimants (the **"Sites"**), on the terms of an order of the Honourable Mr Justice Thompsell dated 6 October 2025 (the **"Injunction Order"**). The Injunction Order was granted against Persons Unknown and provides, at paragraph 7, for the injunction to be reviewed annually.

The Claimants have applied to Court for a review of the injunction (the **"Review Application"**). A hearing of the Review Application has been listed in a three-day window from 18 November 2026 onwards. Alongside the Review Application, the Claimants have also applied: (i) to join you, together with three other named individuals, to the Claim as defendants pursuant to CPR 19.2; and (ii) to make consequential amendments to the Claimants' Re-Amended Claim Form and Re-Amended Particulars of Claim; and (iv) if required in addition to the Review Application, to formally review the Injunction Order (the "**Joinder Application"**).

The Alternative Means Order permits the Claimants to serve the Joinder Application, the Review Application and the other documents referred to in that Order on you by alternative means, including by posting those documents to you at this address and by uploading them to the website referred to below. This letter, together with the documents enclosed with it and listed below, constitutes service by post pursuant to paragraph 1(i) of the Alternative Means Order.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Enclosed documents

In accordance with paragraph 5 of the Alternative Means Order, we enclose:

The Joinder Application

a) The application documents for the Joinder Application, namely:

i. The Claimants' application notice dated 2nd October 2026;

ii. The draft amended Claim Form and draft amended Particulars of Claim;

iii. The draft order; and

iv. The fifth witness statement of Elwira Kelly dated 2nd October 2026 and its exhibit.

The Review Application

b) The application documents for the Review Application, namely:

i. The Claimants' application notice dated 28 July 2026; and

ii. Notice of Hearing.

The Alternative Means Order

c) The application documents for the Alternative Means Order, namely:

i. the Claimants' Application Notice dated 28 July 2026;

ii. the accompanying Fourth Witness Statement of Elwira Kelly dated 28 July 2026 and its exhibit; and

iii. the Alternative Means Order dated 3 September 2026.

For completeness, we also include all other documents previously filed by the Claimants in these proceedings.

Further documents relevant to the injunction

Pursuant to paragraph 1(ii) of the Alternative Means Order, the documents referred to above (other than Schedule 1 to the Alternative Means Order, which contains the postal addresses of the Named Defendants) have also been uploaded to the following website: www.moog.co.uk/injunction.

That website also contains documents which are relevant to the injunction and the underlying proceedings, and which you may also wish to review at this stage.

Right to apply

You are entitled to apply to the Court to set aside or vary the Alternative Means Order, pursuant to CPR r.23.10. You may also wish to seek your own independent legal advice in relation to these proceedings and the matters referred to in this letter.

Hearing Date

The exact date within the three-day window on which the Review Hearing will be heard has not yet been confirmed by the Court. Once confirmed, this information will be available via HM Courts & Tribunals Service's published court listings for the Business and Property Division at https://www.court-tribunal-hearings.service.gov.uk/summary-of-publications?locationId=111.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Alternatively, if you provide us with an email address, we will notify you of the specific hearing date as soon as we are informed of it by the Court.

Service of further evidence

Please note that, pursuant to paragraph 7 of the Injunction Order, the Claimants are permitted to file and serve any evidence in support 14 days before the Review Hearing. We may therefore serve further evidence on you in advance of the Review Hearing.

If you wish to be served by email or if you instruct a solicitor to act for you in these proceedings, please provide the relevant details to us at mooglegal@moog.com and we will arrange for future documents to be served accordingly, in accordance with paragraph 1(iv) and (v) of the Alternative Means Order.

Yours sincerely,

Moog Inc.

Encs.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Delivered

Your item was delivered on **14-10-2026**.

Not the signature you expected? Find out why.

Tracking number:

[redacted]

Service used:

Royal Mail Special Delivery Guaranteed 1pm™

Proof of delivery



Rotate image

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE



Rotate image

Signed for by: SHERMAN

Delivered at: 11:34, Wednesday 14 October 2026

Tracking history

Wednesday 14 October 2026

11:34	**Delivered and Signed** [redacted] DO
08:30	**Due to be delivered today by** [redacted] DO
07:43	**Arrived at** [redacted] DO
05:12	**Item Despatched to** [redacted] **DO** Gatwick MC
04:09	**Arrived at** Gatwick MC

Tuesday 13 October 2026

21:03	****Item Despatched to Gatwick MC** London Central MC
18:43	**Item received at**

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

[redacted] Road Post Office [redacted]

Need help?

I need help with my reference number

My tracking message looks wrong

My item is shown as delivered but it hasn't been

Help tracking items posted to another country from the UK

Our partners

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Delivered

Your item was delivered on **15-10-2026**.

Not the signature you expected? Find out why.

Tracking number:

[redacted]

Service used:

Royal Mail Special Delivery Guaranteed 1pm™

Proof of delivery



Rotate image

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE



Rotate image

Signed for by: HEAVENS

Delivered at: 13:23, Thursday 15 October 2026

Tracking history

Thursday 15 October 2026

13:23 — **Delivered and Signed**
[redacted] DO

07:06 — **Due to be delivered today by**
[redacted] DO

Wednesday 14 October 2026

10:55 — **Delivery Attempted - No Answer**
[redacted] DO

07:22 — **Due to be delivered today by**
[redacted] DO

Tuesday 13 October 2026

19:00 — **Item Despatched to Leeds MC**
London Central MC

18:42 — **Item received at**

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

[redacted] Road Post Office [redacted]

Map of delivery location

Need help?

I need help with my reference number

My tracking message looks wrong

My item is shown as delivered but it hasn't been

Help tracking items posted to another country from the UK

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Delivered

Your item was delivered on **14-10-2026**.

Not the signature you expected? Find out why.

Tracking number:

[redacted]

Service used:

Royal Mail Special Delivery Guaranteed 1pm™

Proof of delivery



Rotate image

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE



Rotate image

Signed for by: ALKHAMESI

Delivered at: 09:30, Wednesday 14 October 2026

Tracking history

Wednesday 14 October 2026

09:30	**Delivered and Signed** [redacted] DO
07:17	**Due to be delivered today by** [redacted] DO
05:43	**Item Despatched to** [redacted] **DO** South Midlands MC
01:04	**Arrived at** South Midlands MC

Tuesday 13 October 2026

19:58	****Item Despatched to South Midlands MC** London Central MC
18:43	**Item received at** London Central MC
16:38	**Accepted at Parcelshop**

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Need help?

I need help with my reference number

My tracking message looks wrong

My item is shown as delivered but it hasn't been

Help tracking items posted to another country from the UK

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE



Pending

Sorry, we tried to deliver your parcel on **16-10-2026** but there didn't seem to be anyone in. To book a redelivery, please choose an option below.

Update delivery options

At this time we recommend you book a Redelivery. Download the Royal Mail App to book a Redelivery and see our revised opening hours for Customer Service Points. If collecting remember to check and bring the 'Something for you card' we left or, the equivalent SMS or email notification if you received one, and one of these forms of I.D.. For Channel Islands and Isle of Man please contact your postal service provider.

Tracking number:

[redacted]

Service used:

Royal Mail Special Delivery Guaranteed 1pm™

Tracking history

Friday 16 October 2026

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

06:24 **Available for Redelivery or Collection**
[redacted] DO

Thursday 15 October 2026

13:57 **Delivery Attempted - No Answer**
[redacted] DO

08:20 **Due to be delivered today by**
[redacted] DO

Wednesday 14 October 2026

12:41 **Delivery Attempted - No Answer**
[redacted] DO

09:18 **Due to be delivered today by**
[redacted] DO

08:59 **Due to be delivered today by**
[redacted] DO

07:27 **Arrived at**
[redacted] DO

00:22 **Item Despatched to** [redacted] **DO**
London Central MC

Tuesday 13 October 2026

21:51 **Item Received**
London Central MC

20:35 ****Item Despatched to London Central MC**
London Central MC

16:38 **Accepted at Parcelshop**
[redacted] Road Post Office [redacted]

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Need help?

I need help with my reference number

My tracking message looks wrong

My item is shown as delivered but it hasn't been

Help tracking items posted to another country from the UK

Our partners

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Moog Inc.
400 Jamison Rd. • East Aurora, NY 14052-0018
Telephone: +1-716 652-2000

MOOG

BY FIRST CLASS POST

Hanah Yun Stevens
[redacted]

Dear Hannah Yun Stevens,

IN THE HIGH COURT OF JUSTICE, BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES, PROPERTY, TRUSTS AND PROBATE LIST (ChD)

CLAIM NO. PT-2025-000910

(1) MOOG WOLVERHAMPTON LIMITED AND OTHERS v (1) PERSONS UNKNOWN AND OTHERS

As you are aware, we are the Claimants in the above civil proceedings. Further to our previous correspondence, we reiterate that we are seeking an order from the court to join you, together with three other named individuals, as defendants to the above proceedings.

The Joinder Application, along with other documents in the proceedings, were sent to you and the other three defendants on 13 October 2026, by way of service in the form of a bundle of documents and covering letter setting out the documents in the bundle.

We have attempted on multiple occasions to ensure that the bundle of documents reaches you, including by tracking Royal Mail delivery on 14 October 2026 and on 15 October 2026, and by instructing a process server to deliver a copy of the documents by hand on 14 October 2026. There has been no answer at the above address on any of these occasions.

We understand that Royal Mail left a delivery card at this address, explaining that you can either arrange for redelivery of the bundle of documents or collect the documents at the address specified by Royal Mail. Alternatively, should you wish for the documents to be sent to a different address than that listed above, you may contact us at mooglegal@moog.com specifying the address to which you wish the documents to be sent and we will arrange for the same.

All documents in these proceedings can also be found online at https://www.moog.co.uk/injunction.html.

We also refer to our letter sent 30 October 2026, by which we requested confirmation of your consent, as one of the defendant parties to the Joinder Application and as requested by the court, to the Joinder Application being heard at the Review Hearing, notwithstanding that in any event we shall be asking the court to hear the Joinder Application at the Review Hearing on the basis that we consider it to be a proportionate and efficient use of the court's time and that it will not increase the time estimate of the Review Hearing. We understand that Royal Mail has also been unable to deliver this letter to you, and so we enclose a copy of this letter here.

Please be aware that, by posting the documents to the address above and uploading copies of the documents onto the above website, Moog has complied with its obligation to serve the

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

documents on you. It will therefore proceed with its application to join you to the above proceedings, together with the other named individuals. It intends to ask the court to hear the Joinder Application at the Review Hearing of the proceedings, which is listed for a three-day window between 18-20 November 2026 (inclusive) with a time estimate of half a day.

Yours sincerely,

Moog Inc.

Enc.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

WITNESS STATEMENT OF [redacted]

I [redacted] **of** [redacted] of PO Box [redacted] Process Server acting under the direction of [redacted] Solicitors acting on behalf of the Claimant Will Say:-

1. THAT having been instructed to hand-deliver a bundle of documents to the Defendant at his address at [redacted] I did for that purpose on Wednesday 14 October 2026 attend that address where at 12:00 hours the door was answered by an adult female. She told me she was the mother of the Defendant and that he was unwell, in bed, and could not come to the door.

2. THAT whilst I was taking instructions the woman I spoke to came out of the house with a dog and walked past me. I waited for an hour but she did not come back and therefore upon further instructions I left the bundle by the front door on Wednesday 14 October 2026 at 16:13 hours and took a photograph which is hereunto exhibited and marked "A"

3. THAT I believe the facts stated in this Statement of 1 page 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.

Dated this 19 October 2026

Signed [redacted]

[redacted]

Process Server

[redacted]

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

THIS IS THE EXHIBIT MARKED "A"

REFERRED TO IN THE WITNESS STATEMENT

OF

[redacted]

DATED THIS 19 OCTOBER 2026

[redacted]

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8623FD015BE

14 Oct 2026 at 16:13:04



Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

WITNESS STATEMENT OF [redacted]

I [redacted] of [redacted] of PO Box [redacted] Process Server acting under the direction of [redacted] Solicitors acting on behalf of the Claimant Will Say:-

1. THAT having been instructed to hand-deliver a bundle of documents to the Defendant at his address at [redacted] I did for that purpose on Wednesday 14 October 2026 attend that address where at 20:00 hours I could obtain no reply. There was no secure place to leave the documents and upon instructions I was asked to return the next day.

2. THAT on Thursday 15 October 2026 I re-attended at [redacted] where at 10:00 hours I could obtain no reply. I spoke to a neighbour who confirmed residence and offered to take the bundle. I took instruction and re-attended at [redacted] where at 14:15 hours I met with and personally handed the bundle of documents to the Defendant on Thursday 15 October 2026

3. THAT I believe the facts stated in this Statement of 1 page 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.

Dated this 19TH. October 2026

Signed [redacted]

[redacted]
Process Server
[redacted]

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

WITNESS STATEMENT OF [redacted]

I [redacted] **of** [redacted] of PO Box [redacted] Process Server acting under the direction of [redacted] Solicitors acting on behalf of the Claimant Will Say:-

1. THAT having been instructed to hand-deliver a bundle of documents to the Defendant at his address at [redacted] I did for that purpose on Wednesday 14 October 2026 attend that address where I could obtain no reply. The next door neighbour confirmed that the Defendant continued to reside at the address and offered to take the bundle. She said that if I wanted to leave the bundle in a secure place I could go through the side door to the back of the property and leave the bundle outside the back door.

2. THAT upon instructions I left the bundle of documents at the back door, took a photograph which is hereunto exhibited and marked "AB" and put a simple note through the front door advising there was a delivery at the back door. This was done on Wednesday 14 October 2026 during the afternoon.

3. THAT I believe the facts stated in this Statement of 1 page 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.

Dated this 19TH October 2026

Signed [redacted]

[redacted]
Process Server
[redacted]

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

THIS IS THE EXHIBIT MARKED "A"

REFERRED TO IN THE WITNESS STATEMENT

OF

[redacted]

DATED THIS 19TH. OCTOBER 2026

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE



Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE



Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

WITNESS STATEMENT OF [redacted]

I [redacted] **of** [redacted] of PO Box [redacted] Process Server acting under the direction of [redacted] Solicitors acting on behalf of the Claimant Will Say:-

1. THAT having been instructed to hand-deliver a bundle of documents to the Defendant at his address at [redacted] I did for that purpose on Wednesday 14 October 2026 attend that address where I could obtain no reply. I made discreet enquiries and ascertained that the address is an Airbnb and there was no-one living there at that time

2. THAT there was nowhere secure enough to leave the bundle of documents and upon instructions I was instructed not to leave the documents. I therefore returned the documents to the offices of [redacted] to be destroyed.

3. THAT I believe the facts stated in this Statement of 1 page 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.

Dated this 19 October 2026

Signed ....[redacted]

Process Server

[redacted]

Moog Injunction

Notice of High Court Injunction

Claim No. PT-2025-000910

Moog Wolverhampton Limited, Moog Fernau Limited, Moog Reading Limited and Moog Controls Limited (Moog) have obtained an injunction (Order) to restrain protestors from unlawfully entering, occupying or remaining on any part of Moog's following UK sites or attempting to interfere with the services at these sites:

1. Moog Aircraft Group Wolverhampton, Valiant Way, Pendeford, Wolverhampton, WV9 5GB
2. Moog Controls Ltd, Units C and J Airport Executive Park, President Way, Luton, LU2 9NY
3. Moog Reading Limited, 30 Suttons Business Park, Reading, Berkshire, RG6 1AW
4. Moog Aircraft Group Tewkesbury, Ashchurch, Tewkesbury, Gloucestershire, GL20 8NA
5. Moog Industrial Group, Ashchurch Parkway, Tewkesbury, Gloucestershire, GL20 8TU

ANY PERSONS WHO DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS PERSONS 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.

Court Documents

View Moog's claim, injunction application, supporting evidence, note of hearing and order here:

- pdf 01 - Claim Form
- pdf 02 - Application Notice
- pdf 03 - EK Statement 1
- pdf 04 - Exhibit EK1
- pdf 05 - EK Statement 2
- pdf 06 - Exhibit EK2
- pdf 07 - Note of Hearing
- pdf 08 - Order
- pdf 09 - Amended Particulars of Claim
- pdf 10 - Application Notice (Return Date)
- pdf 11 - EK Statement 1 (Return Date)
- pdf 12 - Exhibit EK1 (Return Date).pdf
- pdf 13 - EK Statement 2 (Return Date)
- pdf 14 - Exhibit EK2 (Return Date)
- doc 15 - Draft Order (Return Date)
- pdf 16 - Amended Particulars of Claim (Return Date)
- pdf EK3 Exhibit (01.10.2025)
- pdf Moog - third witness statement (01.10.2025)

- N244 - Application Notice - Additional Witness Evidence (01.10.2025)
- N208 - Moog Injunction - AMENDED Claim Form (07.10.2025)
- Moog v PU - RE-AMENDED PARTICULARS OF CLAIM (07.10.2025)
- Moog v PU Minute of Order (08.10.2025)
- Application to List Review Hearing

Alternative Means Order:

- 1. Application Notice of 28 July 2026 (for the service by alternative means on the named defendants)
- 2. Fourth Witness Statement of Elwira Kelly and Exhibit EK4
- 3. Order for Service by Alternative Means of 3 September 2026

Listing Date application:

- 1. Application Notice of 28 July 2026 (for the injunction review hearing)
- 2. Notice of Review Hearing

Joinder application:

- 1. Application Notice of 5 October 2026 (for joining the Named Defendants to the claim and amending the pleadings)
- 2. Fifth Witness Statement of Elwira Kelly
- 3. Exhibit EK5
- 4. Re-Re-Amended Particulars of Claim
- 5. Re-Amended Claim Form
- 6. Draft Amended Injunction Order including Named Defendants

Skeleton Arguments:

- 1. Interim Injunction Skeleton (5 Sept 25)
- 2. Final Injunction Skeleton (6 Oct 25)

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 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.

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 – 20 November 2026, with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Reading Limited, 30 Suttons Business Park, Reading, Berkshire, RG6 1AW.

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 – 20 November 2026, with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Aircraft Group Wolverhampton, Valiant Way, Pendeford, Wolverhampton, WV9 5GB.

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 – 20 November 2026, with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Aircraft Group Tewkesbury, Ashchurch, Tewkesbury, Gloucestershire, GL20 8NA.

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 – 20 November 2026, with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

NOTICE

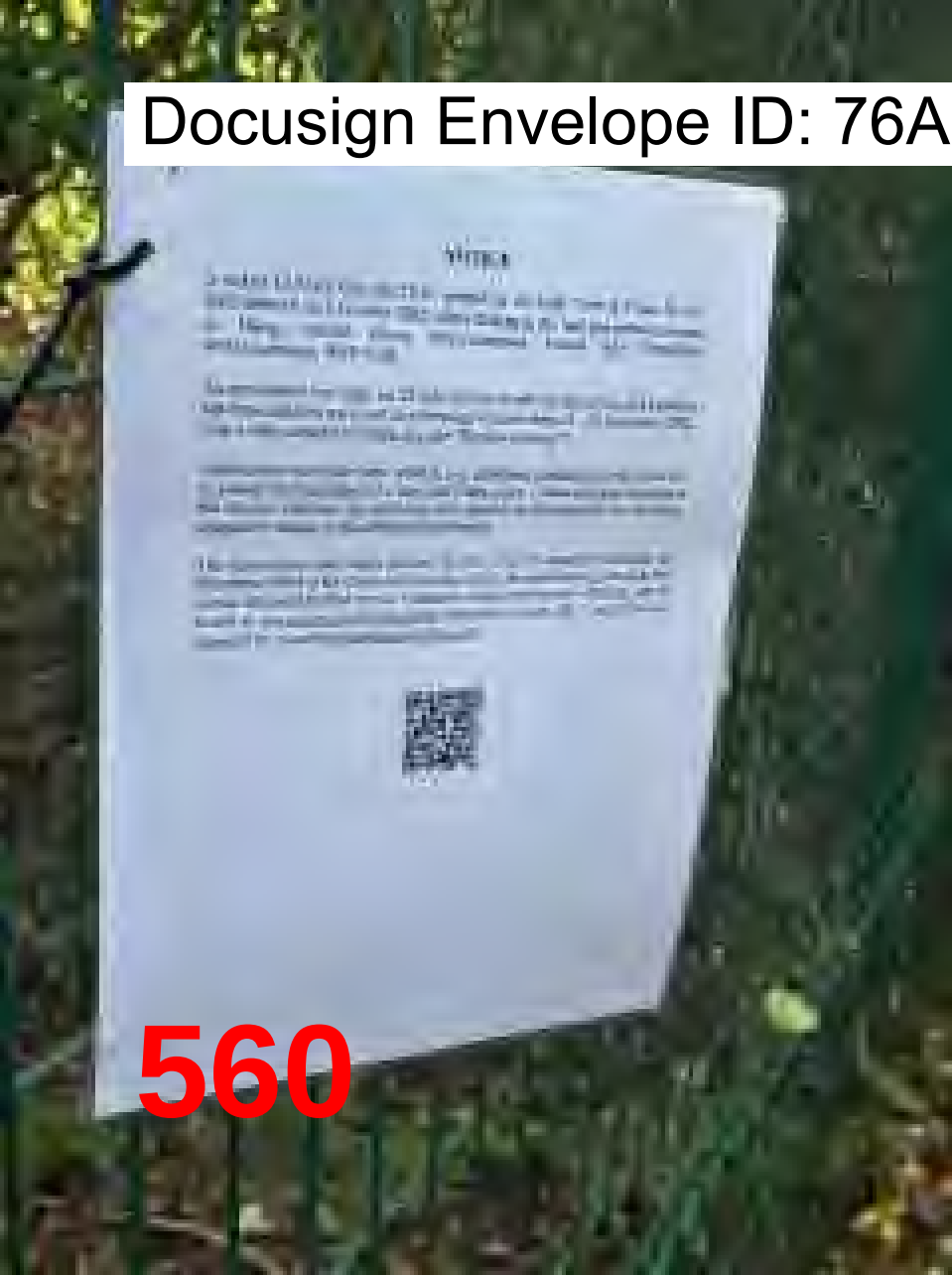
A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Industrial Group, Ashchurch Parkway, Tewkesbury, Gloucestershire, GL20 8TU.

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 – 20 November 2026, with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.

Docusign Envelope ID: 76A



560

Docusign Envelope ID: 76A



Docusign Envelope ID: 76A



Docusign Envelope ID: 76A



Docusign Envelope ID: 76A



Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE



Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

MOOG

NO TAILGATING

Warning
Automatic Barrier in Operation

CCTV in operation

ice
CAUTION
INCREASED RISK OF ICE WHEN LIGHTS FLASH

MOOG

PROHIBITED PLACE

THIS IS A PROHIBITED PLACE UNDER THE NATIONAL SECURITY ACT 2023

PERSONS ENGAGING IN UNAUTHORISED ACTIVITY AS SET OUT UNDER SECTION 4 AND 5 OF THE NATIONAL SECURITY ACT 2023, WHICH INCLUDES THE TAKING OF PHOTOGRAPHS, VIDEOS OR OTHER RECORDINGS, MAY BE ARRESTED AND PROSECUTED

MOOG

STOP!
SECURITY RAMP
ONLY PROCEED
WHEN LIGHT IS GREEN

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

CCTV in operation

INCREAS
OF ICE
LIGHTS

NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-
2025-[illegible]10 on 6 October 2025 exists relating to the land and premises known
as Mayfair Vessels Group Wolverhampton Valiant Way, Pendeford,
Wolverhampton WV9 5QB

An application was made on 24 July 2026 to review the injunction, and a hearing
was listed by the Court on a three-day window from 18 – 20 November 2026.
Please contact the Court to find a day (the "Review Hearing").

Persons have also been made to join additional defendants to the Claim and
to the Particulars of Claim and Claim Form. These will also be heard at
the Review Hearing. No order has been granted for documents to be served by
alternative means on the additional defendants.

Defendants and others received a notice and all supporting evidence, all
documents filed in the Claim and the notice of the Review Hearing, as well as any
documents filed by the Claimants for the Review Hearing, can be
accessed via the QR Code below or

CCTV in operation

G
P!
Y RAMP
ROCEED
T IS GREEN

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE



Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE



Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Aircraft Group Wolverhampton, Valiant Way, Pendeford, Wolverhampton, WV9 5GB.

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 – 20 November 2026, with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.

T-2025-
s Moog
'9 5GB.

PY OR
N PLAN
MOOG
WAY,

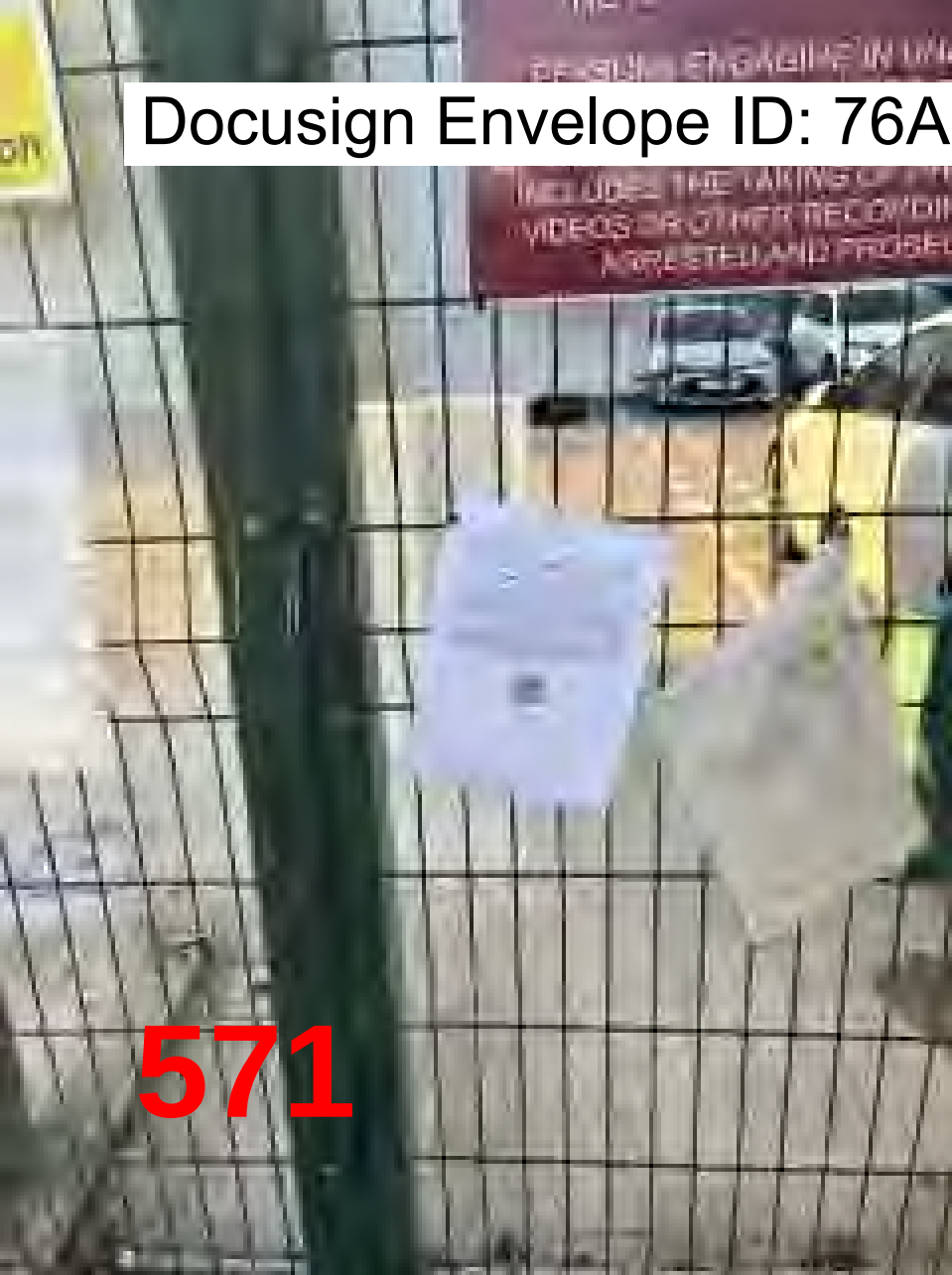
TRUCT
RFERE
EMISES

F THE
RED ON

ISTING
AY BE
FINED

ndments
ootage as
QR Code

Docusign Envelope ID: 76A



Docusign Envelope ID: 76A



Docusign Envelope ID: 76A



Docusign Envelope ID: 76A



Docusign Envelope ID: 76A



Docusign Envelope ID: 76A



Docusign Envelope ID: 76A



Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE



Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE



Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE



Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE



Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE



Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE



Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Aircraft Group Tewkesbury, Ashchurch, Tewkesbury, Gloucestershire, GL20 8NA.

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 – 20 November 2026, with a time estimate of half a day (the "Review Hearing")

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.

IN THE HIGH COURT OF JUSTICE

CHANCERY DIVISION

PT-2025-000910

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Aircraft Group Tewkesbury, Ashchurch, Tewkesbury, Gloucestershire, GL20 8NA.

An application was made on 24 July 2026 to vary the injunction and a hearing has been listed by the Court on a [date] [day] [month] from [x] – [y] November 2026 with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and certain materials above and all supporting evidence, all documents filed to the Court and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com

Warning
Guard dogs
on patrol

WARNING: NO UNAUTHORISE
For access, please call 07741 8

These premises are protected by
Carlisle
SUPPORT SERVICES

CCTV cameras and guards monitor this site 24/7. All visitors may be subject to a vehicle search.

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 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 OR SABOTAGE 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. **DELIBERATELY AND WITH KNOWLEGDE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 4**
3. **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 (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest) can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com



Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

HM Land Registry

Plan 4

Formal
Industrial Park

Fire exit
Keep
Clear

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 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 OR SABOTAGE 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. **DELIBERATELY AND WITH KNOWLEGDE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 4**
3. **INTERFERE OR ATTEMPT TO INTERFERE WITH ANY OF THE SERVICES SERVING THE LAND AND PREMISES SHOWN EGDED RED ON PLAN 4**

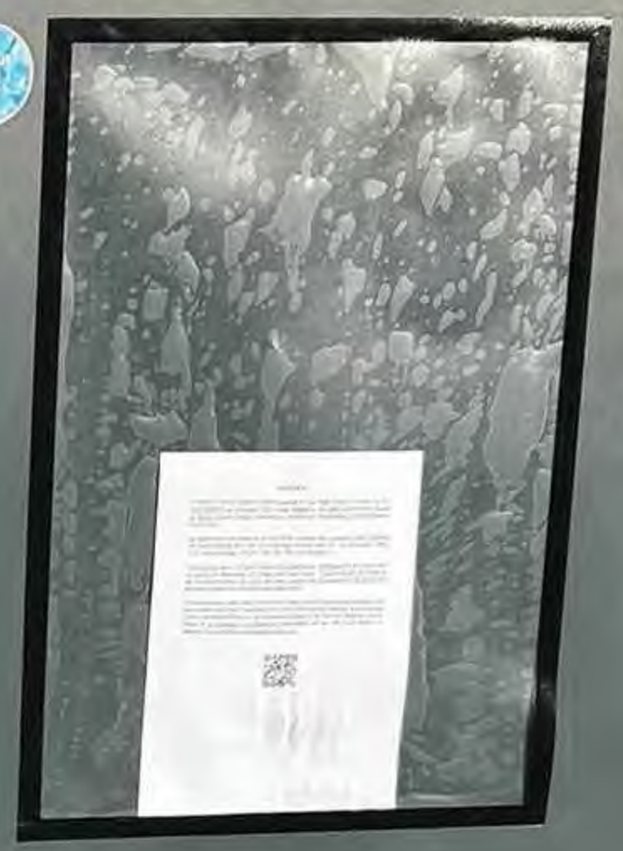
ANYONE BREACHING THE TERMS OF THIS COURT ORDER OR ASSISTING ANY OTHER PERSON IN BREACHING THE TERMS OF THIS ORDER MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE SENT TO PRISON, FINED OR HAVE THEIR ASSETS SEIZED

A copy of the Order and the legal proceedings to which it relates (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest) can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal2@moog.com

NOTICE

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE





Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE



WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 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 OR SABOTAGE 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. **DELIBERATELY AND WITH KNOWLEGDE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 4**
3. **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 (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest) can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.

NOTICE

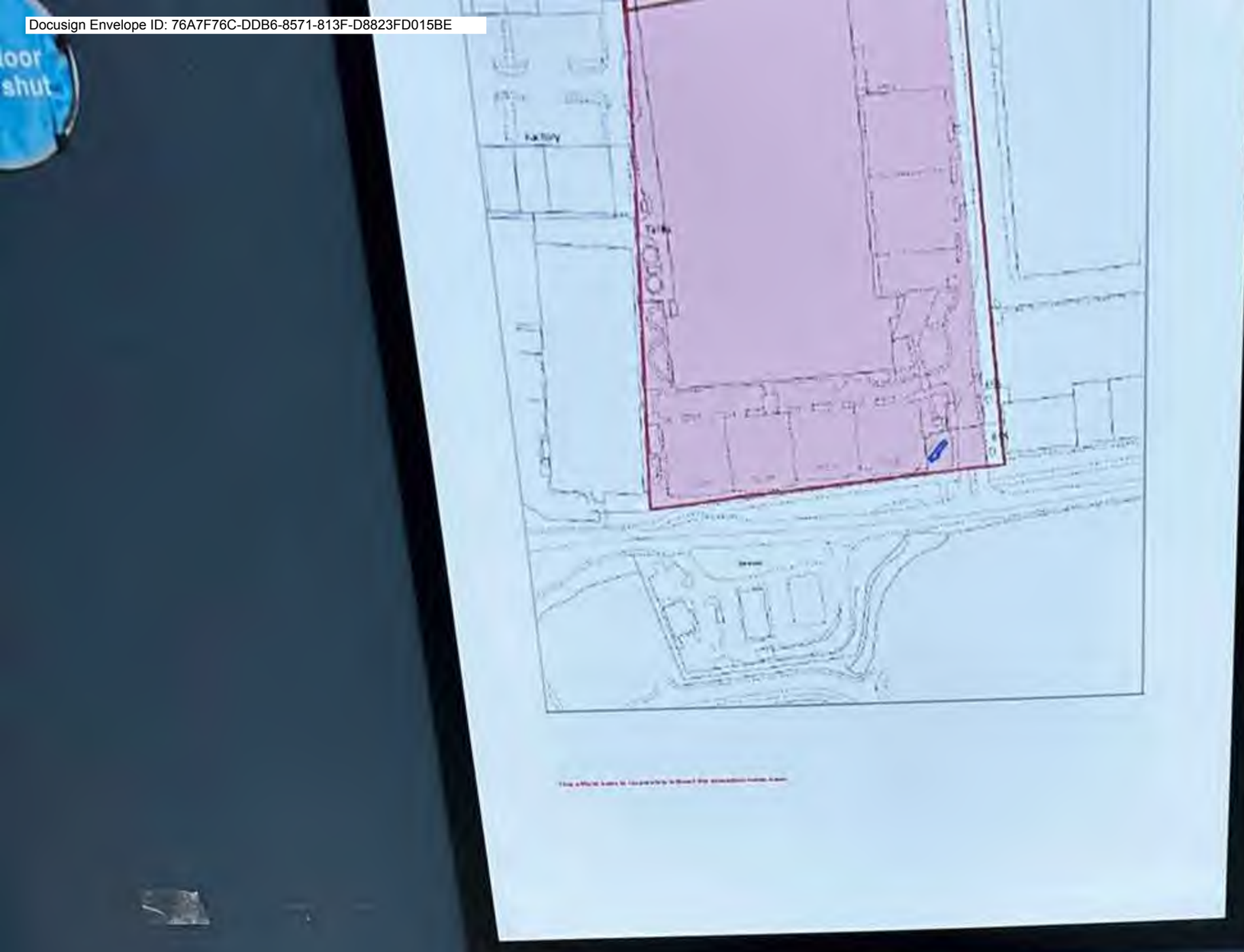
A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Aircraft Group Tewkesbury, Ashchurch, Tewkesbury, Gloucestershire, GL20 8NA.

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 – 20 November 2026, with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be listed at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimant ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE



WARNING NOTICE OF COURT INJUNCTION

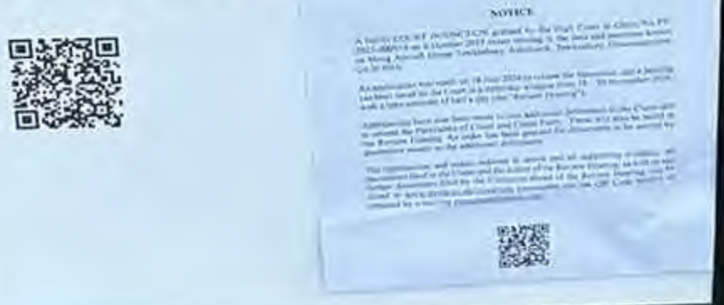
A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Aircraft Group Tewkesbury, Ashchurch, Tewkesbury, Gloucestershire, GL20 8NA.

The injunction means you may not:

1. **FOR THE PURPOSE OF PROTEST OR SABOTAGE 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. **DELIBERATELY AND WITH KNOWLEGDE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 4**
3. **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 (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest) can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@emoog.com



Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Fire exit

Keep clear



Fire door keep shut

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 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 OR SABOTAGE 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. DELIBERATELY AND WITH KNOWLEGDE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 4
3. 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 (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest) can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing moogtegal@moog.com

NOTICE

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE




NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Aircraft Group Tewkesbury, Ashchurch, Tewkesbury, Gloucestershire, GL20 8NA.

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 - 20 November 2026, with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing can be found at www.moog.co.uk/injunction (accessible via the QR Code) or can be obtained by e-mailing moogtrespass@moog.com.



Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE



Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

NOTICE: APPLICATION TO LIST A REVIEW HEARING

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Aircraft Group

Tewkesbury, Ashchurch, Tewkesbury, Gloucestershire, GL20 8NA.

The Claimants have made a further application on 28 July 2026 to list a hearing at which the review of the injunction granted on 6 October 2025 will take place, with a time estimate of 2 ½ hours.

The Claimants' application was filed on 28 July 2026 and can be accessed online, alongside the injunction order and the legal proceedings to which it relates, at: www.moog.co.uk/injunction or obtained in hard copy by e-mailing mooglegal@moog.com

Fire exit keep clear

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 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 OR SABOTAGE 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. **DELIBERATELY AND WITH KNOWLEGDE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 4**
3. **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 (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest) can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.



NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Aircraft Group Tewkesbury, Ashchurch, Tewkesbury, Gloucestershire, GL20 8NA.

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 – 20 November 2026, with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE



WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 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 OR SABOTAGE 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. **DELIBERATELY AND WITH KNOWLEGDE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 4**
3. **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 (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest) can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.

NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Aircraft Group Tewkesbury, Ashchurch, Tewkesbury, Gloucestershire, GL20 8NA.

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 - 20 November 2026 with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, the documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Aircraft Group Tewkesbury, Ashchurch, Tewkesbury, Gloucestershire, GL20 8NA.

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 – 20 November 2026, with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

HM Land Registry
Official copy of
title plan

Title number GR478429
Ordnance Survey map reference SO9233SW
Scale 1:1250 enlarged from 1:2500
Administrative area Gloucestershire :
Tewkesbury

Plan 4

Formal
Industrial Park

CSS

NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Aircraft Group Tewkesbury, Ashchurch, Tewkesbury, Gloucestershire, GL20 8NA.

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 – 20 November 2026, with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

NOTICE: APPLICATION TO LIST A REVIEW HEARING

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Aircraft Group

Tewkesbury, Ashchurch, Tewkesbury, Gloucestershire, GL20 8NA.

The Claimants have made a further application on 28 July 2026 to list a hearing at which the review of the injunction granted on 6 October 2025 will take place, with a time estimate of 2 ½ hours.

The Claimants' application was filed on 28 July 2026 and can be accessed online, alongside the injunction order and the legal proceedings to which it relates, at: www.moog.co.uk/injunction or obtained in hard copy by e-mailing mooglegal@moog.com

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 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 OR SABOTAGE 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. **DELIBERATELY AND WITH KNOWLEGDE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 4**
3. **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 (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest) can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.



NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Aircraft Group Tewkesbury, Ashchurch, Tewkesbury, Gloucestershire, GL20 8NA.

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 – 20 November 2026, with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Fire exit keep clear



WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 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 OR SABOTAGE 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. **DELIBERATELY AND WITH KNOWLEGDE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 4**
3. **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 (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest) can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com


NOTICE

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE



WARNING NOTICE OF COURT INJUNCTION

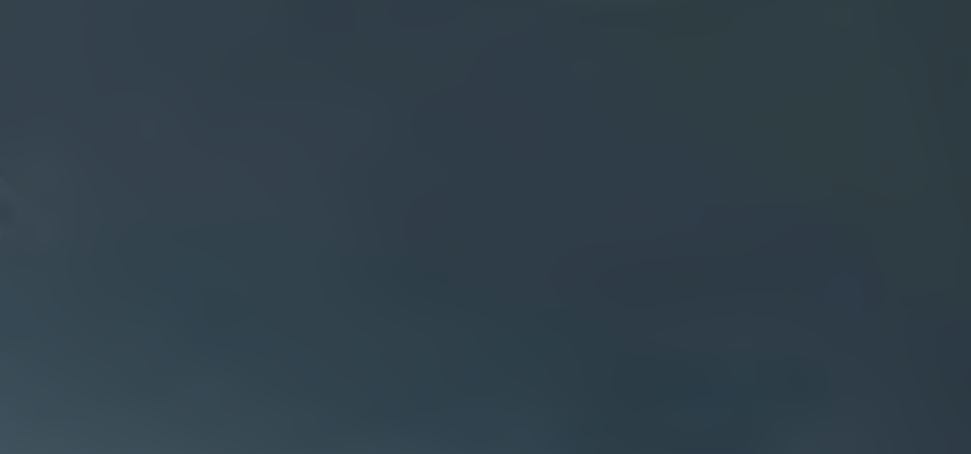
A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Aircraft Group Tewkesbury, Ashchurch, Tewkesbury, Gloucestershire, GL20 8NA.

The injunction means you may not:

1. **FOR THE PURPOSE OF PROTEST OR SABOTAGE 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. **DELIBERATELY AND WITH KNOWLEGDE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 4**
3. **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 (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest) can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.



Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Aircraft Group Tewkesbury, Ashchurch, Tewkesbury, Gloucestershire, GL20 8NA.

An application was made on 28 July 2026 to review the injunction, and a hearing has been fixed by the Court on a time estimate of 2 ½ hours.

Applications were also made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served on unnamed parties via the additional defendants.

The application and papers relevant to illegal and air-supporting residents, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found [illegible] or obtained by e-mailing [illegible]

Plan 4

NOTICE: APPLICATION TO ADDUCE FURTHER WITNESS EVIDENCE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 September 2025 exists relating to the land and premises known as Moog Aircraft Group Tewkesbury, Ashchurch, Tewkesbury, Gloucestershire, GL20 8NA.

A further hearing is listed in the Order will take place at the Rolls Building, 7 Rolls Building, Fetter Lane, London, EC4A 1NL on 9 October 2025, at which the Claimants' application for continuation of the interim injunction relief granted by the Order and a further order preventing protest from obstructing access to or egress from the land and premises shown edged red on 'Plan 4' will be heard. The Claimants have made a further application on 1 October 2025 to seek permission to rely on the Third Witness Statement of Gavin Kelly ("GK3") in support of the Claimants' application dated 15 September 2025 to continue the injunction granted by Mavitty J on 5 September 2025 and for additional injunctive relief as set out in the Claimants' Application Notice of 4 September 2025. The Claimants also seek provision in the draft order appended to an application of 15 September 2025 for the grant of permission to adduce supplemental witness evidence (GK3).

The Claimants' application was filed on [illegible] and can be accessed online, alongside the Order and the legal proceedings to which it relates, at [illegible] or obtained in hard copy by e-mailing [illegible]

Fire door keep shut

NOTICE: APPLICATION TO LIST A REVIEW HEARING

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Aircraft Group

Tewkesbury, Ashchurch, Tewkesbury, Gloucestershire, GL20 8NA.

The Claimants have made a further application on 28 July 2026 to list a hearing at which the review of the injunction granted on 6 October 2025 will take place, with a time estimate of 2 ½ hours.

The Claimants' application was filed on 28 July 2026 and can be accessed online, alongside the injunction order and the legal proceedings to which it relates, at: www.moog.co.uk/injunction or obtained in hard copy by e-mailing mooglegal@moog.com

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 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 OR SABOTAGE 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. **DELIBERATELY AND WITH KNOWLEGDE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 4**
3. **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 (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest) can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE





WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 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 OR SABOTAGE 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. **DELIBERATELY AND WITH KNOWLEGDE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 4**
3. **INTERFERE OR ATTEMPT TO INTERFERE WITH ANY OF THE SERVICES SERVING THE LAND AND PREMISES SHOWN EGDED RED ON PLAN 4**

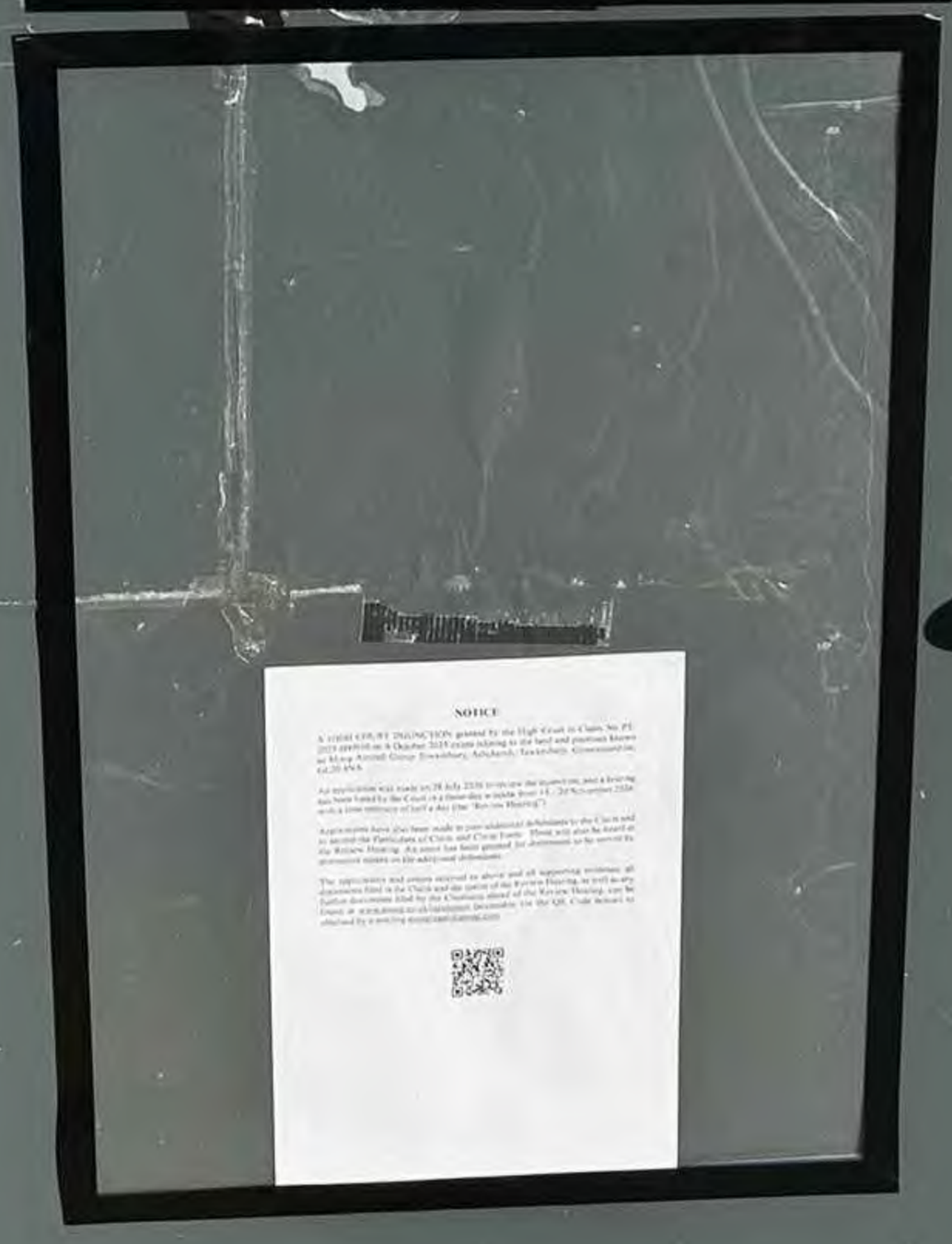
ANYONE BREACHING THE TERMS OF THIS COURT ORDER OR ASSISTING ANY OTHER PERSON IN BREACHING THE TERMS OF THIS ORDER MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE SENT TO PRISON, FINED OR HAVE THEIR ASSETS SEIZED

A copy of the Order and the legal proceedings to which it relates (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest) can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing moogiegal@moog.com.

NOTICE

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE





Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Fire exit keep clear

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 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 OR SABOTAGE 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. **DELIBERATELY AND WITH KNOWLEGDE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED RED ON PLAN 4**
3. **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 (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest) can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing moogl

NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Aircraft Group Tewkesbury, Ashchurch, Tewkesbury, Gloucestershire, GL20 8NA.

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 – 20 November 2026, with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing moogl

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Tewkesbury

Plan 4

Formal
Industrial Park

NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Aircraft Group Tewkesbury, Ashchurch, Tewkesbury, Gloucestershire, GL20 8NA.

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 – 20 November 2026, with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Aircraft Group Tewkesbury, Ashchurch, Tewkesbury, Gloucestershire, GL20 8NA.

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 – 20 November 2026, with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moo[illegible]m.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

PTSG
Lightning Protection Testing
ELECTRICITY AT WORK REGULATIONS 1989
THIS LIGHTNING PROTECTION SYSTEM SHOULD BE TESTED ANNUALLY
TESTED
www.ptsg.co.uk tel:01782 985797

NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Aircraft Group Tewkesbury, Ashchurch, Tewkesbury, Gloucestershire, GL20 8NA.

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 – 20 November 2026, with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

WARNING NOTICE OF COURT INJUNCTION

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 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.

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 – 20 November 2026, with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 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.

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 – 20 November 2026, with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 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.

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 – 20 November 2026, with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

C | Fire assembly point

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000918 on 6 October 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 OR SABOTAGE 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. DELIBERATELY AND WITH KNOWLEDGE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED YELLOW ON PLAN 2
3. INTERFERE OR ATTEMPT TO INTERFERE WITH ANY OF THE SERVICES SERVING THE LAND AND PREMISES SHOWN EGDED 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 (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest)can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing moogiegal@moog.com

H.M. LAND REGISTRY BD154447

Plan 2

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 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.

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 – 20 November 2026, with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

GOODS IN

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000918 on 8 October 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 OR SABOTAGE 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. DELIBERATELY AND WITH KNOWLEDGE OF THIS ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED YELLOW ON PLAN 2
3. 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 (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest)can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing moogtrust@moog.com

HM LAND REGISTRY

BD154447

Plan 2

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 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.

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 – 20 November 2026, with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.

IN THE H
CHANCE

BETWEEN

(1) PERSO
SABOTAGE
AND PR
AIRCRAFT
WOLV
INTERFERE
WITH ACC

(2) PERSONS
SABOTAGE EN
AND PREMIS
CONTROLS LT
PRESIDENT
INTERFERE W
WITH ACCES

(3) PERSONS UN
SABOTAGE ENTE
AND PRFMISES
READING LE

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE



Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 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.

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 – 20 November 2026, with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. Those will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 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.

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 – 20 November 2026, with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.

Docusign Envelope ID: 76A776C-DD86-8571-813F-D8823FD0158E

J

Fire assembly point

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 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 OR SABOTAGE 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. **DELIBERATELY AND WITH KNOWLEDGE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED YELLOW ON PLAN 2**
3. **INTERFERE OR ATTEMPT TO INTERFERE WITH ANY OF THE SERVICES SERVING THE LAND AND PREMISES SHOWN EGDED 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 (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest)can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com

H.M. LAND REGISTRY — BD154447

Plan 2

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 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.

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 – 20 November 2026, with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

WARNING NOTICE OF COURT INJUNCTION

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 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.

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 – 20 November 2026, with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No.PT-2025-000910 on 6 October 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 OR SABOTAGE 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. DELIBERATELY AND WITH KNOWLEDGE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED YELLOW ON PLAN 2
3. INTERFERE OR ATTEMPT TO INTERFERE WITH ANY OF THE SERVICES SERVING THE LAND AND PREMISES SHOWN EGDED 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 (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest)can be viewed at www.moog.co.uk/injunction (access/ble via the QR Code below) or obtained by e-mailing mooglegal@moog.com

H.M. LAND REGISTRY

BD154447

Plan 2

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

NOTICE

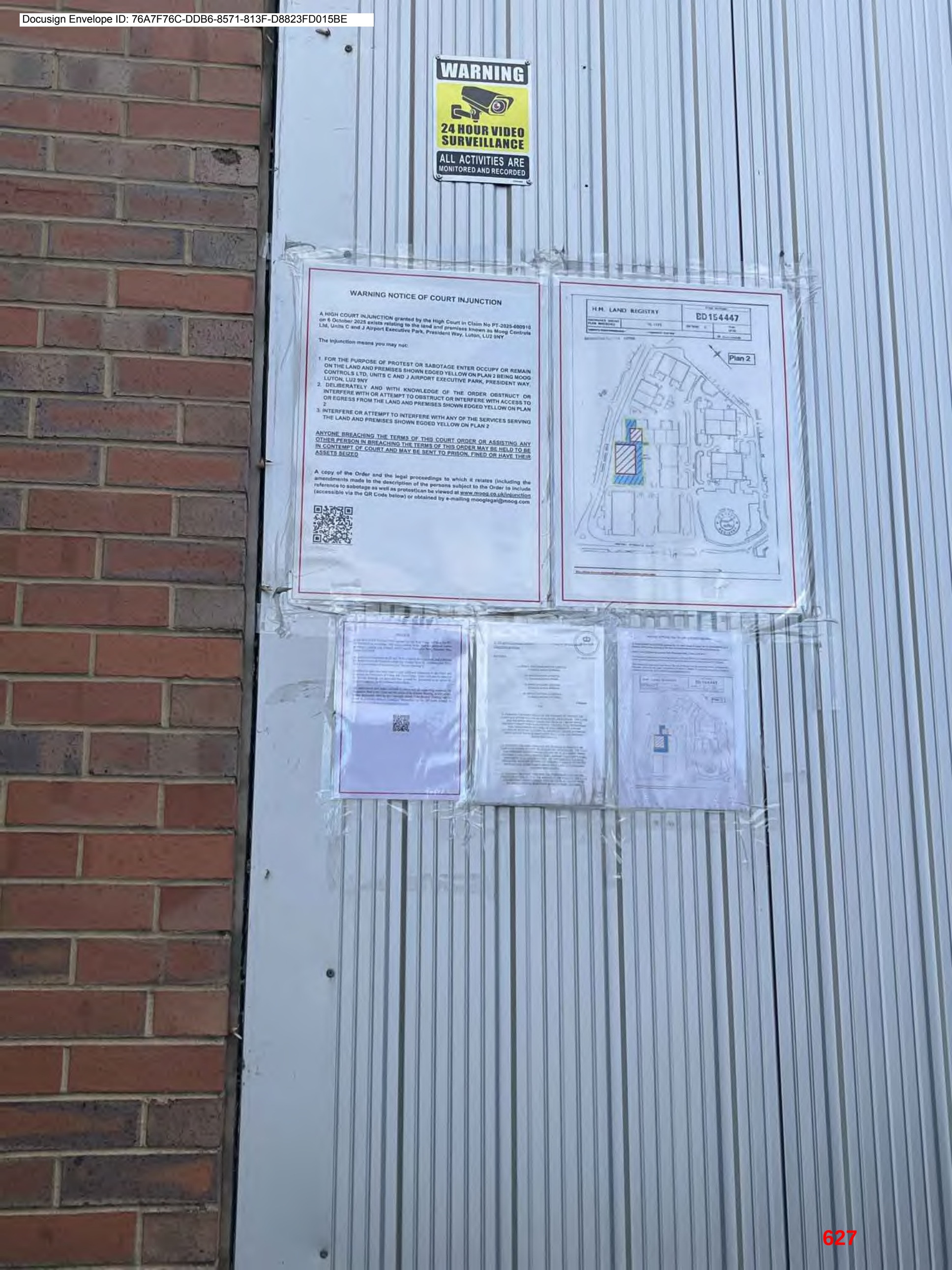
A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Controls Ltd, Units C and J Airport Executive Park, President Way, Luton, LU2 9NY.

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 – 20 November 2026, with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE



Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 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.

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 – 20 November 2026, with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

an 3

IN THE HIGH COURT OF JUSTICE
CHANCERY DIVISION

Claim No. PT-2025-000910

BETWEEN

(1) MOOG WOLVERHAMPTON LIMITED
(Company number 2780856)

(2) MOOG FERNAU LIMITED
(Company number 983895)

(3) MOOG READING LIMITED
(Company number 00586504)

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 (FIRST DEFENDANT)

(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 (SECOND DEFENDANT)

(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.

NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Reading Limited, 30 Suttons Business Park, Reading, Berkshire, RG6 1AW.

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 – 20 November 2026, with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No. PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Reading Limited, 30 Suttons Business Park, Reading, Berkshire, RG6 1AW.

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 16 – 20 November 2026 with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be sent to the alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing moogbp@simmons.com.

Fire escape Keep clear

WARNING

A HIGH COURT INJUNC
000910 on 6 October 2025
Reading Limited, 30 Suttons

The injunction means you ma

1. FOR THE PURPO
REMAIN ON THE
PLAN 3 BEING M
PARK, READING,
2. DELIBERATELY
OBSTRUCT OR IN
INTERFERE WITH
PREMISES SHOWN
3. INTERFERE OR A
SERVICES SERVIN
YELLOW ON PLAN

ANYONE BREACHING THE T
ANY OTHER PERSON IN BREA
HELD TO BE IN CONTEMPT OF
OR HAVE THEIR ASSETS SEIZE

A copy of the Order and the legal pro
made to the description of the persons
well as protest)can be viewed at www
below) or obtained by e-mailing moogb

IN THE HIGH COURT OF JUSTICE
CHANCERY DIVISION

BETWEEN:

(1) MOOG HOLDINGS LIMITED
(2) MOOG ISAACT LIMITED
(3) MOOG READING LIMITED
(4) MOOG CONTROLS LIMITED
(Company number 01171546)

and

Defendants

HM Land Registry
Official copy of title plan

Title number BK
Ordinance Survey
Scale 1:1250
Administrative are

This official copy is incomplete without the preceding notes pages.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

HM Land Registry
Official copy of
title plan

Plan 3

No
smoking

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Reading Limited, 30 Suttons Business Park, Reading, Berkshire, RG6 1AW

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 - 20 November 2026, with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing moogleg@moog.com.

IN THE HIGH COURT OF JUSTICE
CHANCERY DIVISION

Claim No: PT-2025-000910

BETWEEN

(1) MOOG WOLVERHAMPTON LIMITED
(Company number 6700836)

(2) MOOG FERNAU LIMITED
(Company number 3048895)

(3) MOOG READING LIMITED
(Company number 00586505)

(4) MOOG CONTROLS LIMITED
(Company number 01177949)

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 (FIRST DEFENDANT)

(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 (SECOND DEFENDANT)

(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,

escape
Keep
clear

WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 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 OR SABOTAGE 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. **DELIBERATELY AND WITH KNOWLEGDE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED YELLOW ON PLAN 3**
3. **INTERFERE OR ATTEMPT TO INTERFERE WITH ANY OF THE SERVICES SERVING THE LAND AND PREMISES SHOWN EGDED YELLOW ON PLAN 3**

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

A copy of the Order and the legal proceedings to which it
made to the description of the persons subject to th
well as protest)can be viewed at
below) or obtained by

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

30

...DEFENDANT)
...AND PREMISES

...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
(SECOND DEFENDANT)

(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,

NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Reading Limited, 30 Suttons Business Park, Reading, Berkshire, RG6 1AW.

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 – 20 November 2026, with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

NOTICE

IN THE HIGH COURT OF JUSTICE [illegible] Claim No. PT-2025-000910

2025-000910 on 6 October 2025 relating to the land and premises known as Moog Reading Limited, 30 Suttons Business Park, Reading, Berkshire, RG6 1AW.

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 - 20 November 2026, with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional Defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and supporting evidence, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com





WARNING

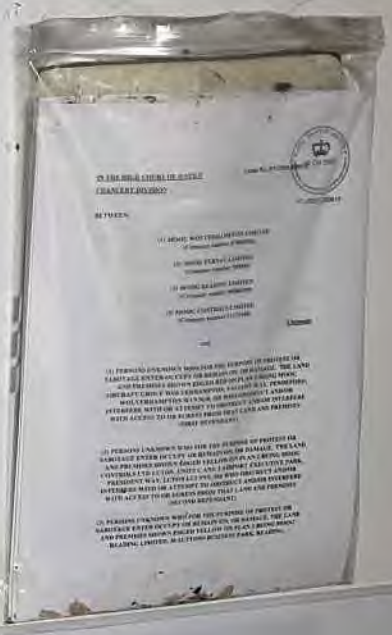
THESE PREMISES ARE PROTECTED

CLOSED CIRCUIT TELEVISION

IMAGES ARE RECORDED FOR THE PURPOSE OF CRIME PREVENTION AND PUBLIC SAFETY

Operator: MOOG READING LTD Contact: 0118 966 6044

24 HR VIDEO RECORDIN



WARNING NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 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 OR SABOTAGE 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. DELIBERATELY AND WITH KNOWLEGDE OF THE ORDER OBSTRUCT OR INTERFERE WITH OR ATTEMPT TO OBSTRUCT OR INTERFERE WITH ACCESS TO OR EGRESS FROM THE LAND AND PREMISES SHOWN EDGED YELLOW ON PLAN 3
3. INTERFERE OR ATTEMPT TO INTERFERE WITH ANY OF THE SERVICES SERVING THE LAND AND PREMISES SHOWN EGDED 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 (including the amendments made to the description of the persons subject to the Order to include reference to sabotage as well as protest)can be viewed at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Reading Limited, 30 Suttons Business Park, Reading, Berkshire, RG6 1AW.

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 – 20 November 2026, with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.



Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE



V in operation
e being recorded for the purpose
prevention and public safety.
ntact: 0118 966 6044
information about the scheme.
e scheme is controlled by:
OOG READING LTD



Fire
scape
Keep
clear



No
noking

NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Reading Limited, 30 Suttons Business Park, Reading, Berkshire, RG6 1AW.

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 – 20 November 2026, with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing moogleg@moog.com.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000610 on 8 October 2025 exists relating to the land and premises known as Moog Reading Limited, 30 Suttons Business Park, Reading, Berkshire, RG6 1AW.

An application was made on 20 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 - 20 November 2026, with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, all documents filed in the Claim and the notes of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.dentons.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing moogclaim@dentons.com.

IN THE HIGH COURT OF JUSTICE
CHANCERY DIVISION

No smoking
It is against the law to smoke in these premises

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

NOTICE

A HIGH COURT INJUNCTION granted by the High Court in Claim No PT-2025-000910 on 6 October 2025 exists relating to the land and premises known as Moog Reading Limited, 30 Suttons Business Park, Reading, Berkshire, RG6 1AW.

An application was made on 28 July 2026 to review the injunction, and a hearing has been listed by the Court in a three-day window from 18 – 20 November 2026, with a time estimate of half a day (the "Review Hearing").

Applications have also been made to join additional defendants to the Claim and to amend the Particulars of Claim and Claim Form. These will also be heard at the Review Hearing. An order has been granted for documents to be served by alternative means on the additional defendants.

The applications and orders referred to above and all supporting evidence, all documents filed in the Claim and the notice of the Review Hearing, as well as any further documents filed by the Claimants ahead of the Review Hearing, can be found at www.moog.co.uk/injunction (accessible via the QR Code below) or obtained by e-mailing mooglegal@moog.com.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Moog Inc.
400 Jamison Rd. • East Aurora, NY 14052-0018
Telephone: +1-716 652-2000

MOOG

BY FIRST CLASS POST

Bea Sherman (also known as Frank Sherman)
[redacted]

Dear Bea Sherman,

IN THE HIGH COURT OF JUSTICE, BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES, PROPERTY, TRUSTS AND PROBATE LIST (ChD)

CLAIM NO. PT-2025-000910

(1) MOOG WOLVERHAMPTON LIMITED AND OTHERS v (1) PERSONS UNKNOWN AND OTHERS

As you are aware, we are the Claimants in the above civil proceedings.

The bundle of documents served on you previously contained an application notice dated 2 October 2026 and sealed by the court on 5 October 2026, by which the Claimants have sought an order from the court to join you, together with three other named individuals, as defendants to the above proceedings, and to consequently amend the Claimants' Amended Claim Form and Re-Amended Particulars of Claim (the "**Joinder Application**"). A further copy of the sealed Joinder Application notice is enclosed.

As you will be aware, the hearing of the review of the Claimants' injunction has been listed in a three-day window from 18 November 2026, with a time estimate of 2 hours and 30 minutes (the "**Review Hearing**").

To ensure the most efficient use of the court's time and parties' costs, the Claimants have requested that the Joinder Application is heard at the Review Hearing as opposed to a separate hearing.

The sealed notice for the Joinder Application includes a statement from the court that the Joinder Application has been listed as requested during the Review Hearing on the basis that it is agreed by both parties and does not increase the time estimate of the existing hearing.

The Claimants do not consider that the hearing of the Joinder Application at the Review Hearing will increase the time estimate of the existing hearing.

By return, we ask that you confirm your consent, as one of the defendant parties to the Joinder Application and as requested by the court, to the Joinder Application being heard at the Review Hearing. Please confirm this agreement either by email to mooglegal@moog.com or in writing to the court, copying mooglegal@moog.com in any correspondence.

Yours sincerely,

Moog Inc.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Encs.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Moog Inc.
400 Jamison Rd. • East Aurora, NY 14052-0018
Telephone: +1-716 652-2000

MOOG

BY FIRST CLASS POST

Hanah Yun Stevens
[redacted]

Dear Hannah Yun Stevens,

IN THE HIGH COURT OF JUSTICE, BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES, PROPERTY, TRUSTS AND PROBATE LIST (ChD)

CLAIM NO. PT-2025-000910

(1) MOOG WOLVERHAMPTON LIMITED AND OTHERS v (1) PERSONS UNKNOWN AND OTHERS

As you are aware, we are the Claimants in the above civil proceedings.

The bundle of documents served on you previously contained an application notice dated 2 October 2026 and sealed by the court on 5 October 2026, by which the Claimants have sought an order from the court to join you, together with three other named individuals, as defendants to the above proceedings, and to consequently amend the Claimants' Amended Claim Form and Re-Amended Particulars of Claim (the "**Joinder Application**"). A further copy of the sealed Joinder Application notice is enclosed.

As you will be aware, the hearing of the review of the Claimants' injunction has been listed in a three-day window from 18 November 2026, with a time estimate of 2 hours and 30 minutes (the "**Review Hearing**").

To ensure the most efficient use of the court's time and parties' costs, the Claimants have requested that the Joinder Application is heard at the Review Hearing as opposed to a separate hearing.

The sealed notice for the Joinder Application includes a statement from the court that the Joinder Application has been listed as requested during the Review Hearing on the basis that it is agreed by both parties and does not increase the time estimate of the existing hearing.

The Claimants do not consider that the hearing of the Joinder Application at the Review Hearing will increase the time estimate of the existing hearing.

By return, we ask that you confirm your consent, as one of the defendant parties to the Joinder Application and as requested by the court, to the Joinder Application being heard at the Review Hearing. Please confirm this agreement either by email to mooglegal@moog.com or in writing to the court, copying mooglegal@moog.com in any correspondence.

Yours sincerely,

Moog Inc.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Encs.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Moog Inc.
400 Jamison Rd. • East Aurora, NY 14052-0018
Telephone: +1-716 652-2000

MOOG

BY FIRST CLASS POST

Hisham Alkhamesi
[redacted]

Dear Hisham Alkhamesi,

IN THE HIGH COURT OF JUSTICE, BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES, PROPERTY, TRUSTS AND PROBATE LIST (ChD)

CLAIM NO. PT-2025-000910

(1) MOOG WOLVERHAMPTON LIMITED AND OTHERS v (1) PERSONS UNKNOWN AND OTHERS

As you are aware, we are the Claimants in the above civil proceedings.

The bundle of documents served on you previously contained an application notice dated 2 October 2026 and sealed by the court on 5 October 2026, by which the Claimants have sought an order from the court to join you, together with three other named individuals, as defendants to the above proceedings, and to consequently amend the Claimants' Amended Claim Form and Re-Amended Particulars of Claim (the "**Joinder Application**"). A further copy of the sealed Joinder Application notice is enclosed.

As you will be aware, the hearing of the review of the Claimants' injunction has been listed in a three-day window from 18 November 2026, with a time estimate of 2 hours and 30 minutes (the "**Review Hearing**").

To ensure the most efficient use of the court's time and parties' costs, the Claimants have requested that the Joinder Application is heard at the Review Hearing as opposed to a separate hearing.

The sealed notice for the Joinder Application includes a statement from the court that the Joinder Application has been listed as requested during the Review Hearing on the basis that it is agreed by both parties and does not increase the time estimate of the existing hearing.

The Claimants do not consider that the hearing of the Joinder Application at the Review Hearing will increase the time estimate of the existing hearing.

By return, we ask that you confirm your consent, as one of the defendant parties to the Joinder Application and as requested by the court, to the Joinder Application being heard at the Review Hearing. Please confirm this agreement either by email to mooglegal@moog.com or in writing to the court, copying mooglegal@moog.com in any correspondence.

Yours sincerely,

Moog Inc.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Encs.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Moog Inc.
400 Jamison Rd. • East Aurora, NY 14052-0018
Telephone: +1-716 652-2000

MOOG

BY FIRST CLASS POST

Iain Evans
[redacted]

Dear Iain Evans,

IN THE HIGH COURT OF JUSTICE, BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES, PROPERTY, TRUSTS AND PROBATE LIST (ChD)

CLAIM NO. PT-2025-000910

(1) MOOG WOLVERHAMPTON LIMITED AND OTHERS v (1) PERSONS UNKNOWN AND OTHERS

As you are aware, we are the Claimants in the above civil proceedings.

The bundle of documents served on you previously contained an application notice dated 2 October 2026 and sealed by the court on 5 October 2026, by which the Claimants have sought an order from the court to join you, together with three other named individuals, as defendants to the above proceedings, and to consequently amend the Claimants' Amended Claim Form and Re-Amended Particulars of Claim (the "**Joinder Application**"). A further copy of the sealed Joinder Application notice is enclosed.

As you will be aware, the hearing of the review of the Claimants' injunction has been listed in a three-day window from 18 November 2026, with a time estimate of 2 hours and 30 minutes (the "**Review Hearing**").

To ensure the most efficient use of the court's time and parties' costs, the Claimants have requested that the Joinder Application is heard at the Review Hearing as opposed to a separate hearing.

The sealed notice for the Joinder Application includes a statement from the court that the Joinder Application has been listed as requested during the Review Hearing on the basis that it is agreed by both parties and does not increase the time estimate of the existing hearing.

The Claimants do not consider that the hearing of the Joinder Application at the Review Hearing will increase the time estimate of the existing hearing.

By return, we ask that you confirm your consent, as one of the defendant parties to the Joinder Application and as requested by the court, to the Joinder Application being heard at the Review Hearing. Please confirm this agreement either by email to mooglegal@moog.com or in writing to the court, copying mooglegal@moog.com in any correspondence.

Yours sincerely,

Moog Inc.

Encs.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Moog Inc.
400 Jamison Rd. • East Aurora, NY 14052-0018
Telephone: +1-716 652-2000

MOOG

BY FIRST CLASS POST

Bea Sherman (also known as Frank Sherman)
[redacted]

3 November 2026

Dear Bea Sherman,

IN THE HIGH COURT OF JUSTICE, BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES, PROPERTY, TRUSTS AND PROBATE LIST (ChD)

CLAIM NO. PT-2025-000910

(1) MOOG WOLVERHAMPTON LIMITED AND OTHERS v (1) PERSONS UNKNOWN AND OTHERS

We are the Claimants in the above civil proceedings.

We write further to our previous correspondence concerning these proceedings, including our letter of 13 October 2026 enclosing a bundle of documents which comprised, by way of service, the Joinder Application (as defined in that letter) and other documents filed in the proceedings, and subsequent letter of 30 October 2026 which requested your confirmation to agreement that the Joinder Application would be heard at the Review Hearing, as requested by the court on the sealed notice for the Joinder Application. Please note that the Claimants will be asking the court to hear the Joinder Application at the Review Hearing in any event. Should you require further copies of any of this correspondence, please feel free to contact us at the email address below.

We hereby enclose, by way of service, further evidence in support of the review of the Injunction Order (the **"Further Evidence"**). You will be aware that the review hearing for the Injunction Order is listed to take place in a three-day window between 18 November 2026 and 20 November 2026, with a time estimate of half a day.

The further evidence comprises the sixth witness statement of Elwira Kelly dated 3 November 2026 **("Kelly 6"),** together with a bundle of documents comprising Exhibit EK6.

We also enclose a revised version of the Draft Amended Injunction Order including the Named Defendants. This is the proposed order sought in connection with the Claimants' application to join the Named Defendants to these proceedings and review the existing injunction. The order has been revised since it was first provided to you, and we therefore enclose the updated version for completeness. Moog will be asking the court to make an order in these terms at the review hearing.

The Further Evidence has been filed with the court. It has also been uploaded to the following website: www.moog.co.uk/injunction.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

As explained in previous correspondence, the website also contains documents which are relevant to the injunction and the underlying proceedings. We would encourage you to review these documents.

Right to apply

We remind you that you are entitled to apply to the Court to set aside or vary the Alternative Means Order (as defined in our previous correspondence), pursuant to CPR r.23.10. You may also wish to seek your own independent legal advice in relation to these proceedings and the matters referred to in this letter. Should you wish to object to the relief sought by the Claimants, you should seek independent legal advice as soon as possible.

Hearing Date

The exact date within the three-day window on which the Review Hearing will be heard has not yet been confirmed by the Court. Once confirmed, this information will be available via HM Courts & Tribunals Service's published court listings for the Business and Property Division at https://www.court-tribunal-hearings.service.gov.uk/summary-of-publications?locationId=111

Alternatively, if you provide us with an email address, we will notify you of the specific hearing date as soon as we are informed of it by the Court.

Email correspondence

If you wish to be served by email or if you instruct a solicitor to act for you in these proceedings, please provide the relevant details to us at mooglegal@moog.com and we will arrange for future documents to be served accordingly.

Yours sincerely,

Moog Inc.

Encs.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Moog Inc.
400 Jamison Rd. • East Aurora, NY 14052-0018
Telephone: +1-716 652-2000

MOOG

BY FIRST CLASS POST

Hanah Yun Stevens
[redacted]

3 November 2026

Dear Hanah Yun Stevens,

IN THE HIGH COURT OF JUSTICE, BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES, PROPERTY, TRUSTS AND PROBATE LIST (ChD)

CLAIM NO. PT-2025-000910

(1) MOOG WOLVERHAMPTON LIMITED AND OTHERS v (1) PERSONS UNKNOWN AND OTHERS

We are the Claimants in the above civil proceedings.

We write further to our previous correspondence concerning these proceedings, including our letter of 13 October 2026 enclosing a bundle of documents which comprised, by way of service, the Joinder Application (as defined in that letter) and other documents filed in the proceedings, and subsequent letter of 30 October 2026 which requested your confirmation to agreement that the Joinder Application would be heard at the Review Hearing, as requested by the court on the sealed notice for the Joinder Application. Please note that the Claimants will be asking the court to hear the Joinder Application at the Review Hearing in any event. Should you require further copies of any of this correspondence, please feel free to contact us at the email address below.

We hereby enclose, by way of service, further evidence in support of the review of the Injunction Order (the **"Further Evidence"**). You will be aware that the review hearing for the Injunction Order is listed to take place in a three-day window between 18 November 2026 and 20 November 2026, with a time estimate of half a day.

The further evidence comprises the sixth witness statement of Elwira Kelly dated 3 November 2026 **("Kelly 6"),** together with a bundle of documents comprising Exhibit EK6.

We also enclose a revised version of the Draft Amended Injunction Order including the Named Defendants. This is the proposed order sought in connection with the Claimants' application to join the Named Defendants to these proceedings and review the existing injunction. The order has been revised since it was first provided to you, and we therefore enclose the updated version for completeness. Moog will be asking the court to make an order in these terms at the review hearing.

The Further Evidence has been filed with the court. It has also been uploaded to the following website: www.moog.co.uk/injunction.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

As explained in previous correspondence, the website also contains documents which are relevant to the injunction and the underlying proceedings. We would encourage you to review these documents.

Right to apply

We remind you that you are entitled to apply to the Court to set aside or vary the Alternative Means Order (as defined in our previous correspondence), pursuant to CPR r.23.10. You may also wish to seek your own independent legal advice in relation to these proceedings and the matters referred to in this letter. Should you wish to object to the relief sought by the Claimants, you should seek independent legal advice as soon as possible.

Hearing Date

The exact date within the three-day window on which the Review Hearing will be heard has not yet been confirmed by the Court. Once confirmed, this information will be available via HM Courts & Tribunals Service's published court listings for the Business and Property Division at https://www.court-tribunal-hearings.service.gov.uk/summary-of-publications?locationId=111

Alternatively, if you provide us with an email address, we will notify you of the specific hearing date as soon as we are informed of it by the Court.

Email correspondence

If you wish to be served by email or if you instruct a solicitor to act for you in these proceedings, please provide the relevant details to us at mooglegal@moog.com and we will arrange for future documents to be served accordingly.

Yours sincerely,

Moog Inc.

Encs.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Moog Inc.
400 Jamison Rd. • East Aurora, NY 14052-0018
Telephone: +1-716 652-2000

MOOG

BY FIRST CLASS POST

Hisham Alkhamesi
[redacted]

3 November 2026

Dear Hisham Alkhamesi,

IN THE HIGH COURT OF JUSTICE, BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES, PROPERTY, TRUSTS AND PROBATE LIST (ChD)

CLAIM NO. PT-2025-000910

(1) MOOG WOLVERHAMPTON LIMITED AND OTHERS v (1) PERSONS UNKNOWN AND OTHERS

We are the Claimants in the above civil proceedings.

We write further to our previous correspondence concerning these proceedings, including our letter of 13 October 2026 enclosing a bundle of documents which comprised, by way of service, the Joinder Application (as defined in that letter) and other documents filed in the proceedings, and subsequent letter of 30 October 2026 which requested your confirmation to agreement that the Joinder Application would be heard at the Review Hearing, as requested by the court on the sealed notice for the Joinder Application. Please note that the Claimants will be asking the court to hear the Joinder Application at the Review Hearing in any event. Should you require further copies of any of this correspondence, please feel free to contact us at the email address below.

We hereby enclose, by way of service, further evidence in support of the review of the Injunction Order (the **"Further Evidence"**). You will be aware that the review hearing for the Injunction Order is listed to take place in a three-day window between 18 November 2026 and 20 November 2026, with a time estimate of half a day.

The further evidence comprises the sixth witness statement of Elwira Kelly dated 3 November 2026 **("Kelly 6"),** together with a bundle of documents comprising Exhibit EK6.

We also enclose a revised version of the Draft Amended Injunction Order including the Named Defendants. This is the proposed order sought in connection with the Claimants' application to join the Named Defendants to these proceedings and review the existing injunction. The order has been revised since it was first provided to you, and we therefore enclose the updated version for completeness. Moog will be asking the court to make an order in these terms at the review hearing.

The Further Evidence has been filed with the court. It has also been uploaded to the following website: www.moog.co.uk/injunction.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

As explained in previous correspondence, the website also contains documents which are relevant to the injunction and the underlying proceedings. We would encourage you to review these documents.

Right to apply

We remind you that you are entitled to apply to the Court to set aside or vary the Alternative Means Order (as defined in our previous correspondence), pursuant to CPR r.23.10. You may also wish to seek your own independent legal advice in relation to these proceedings and the matters referred to in this letter. Should you wish to object to the relief sought by the Claimants, you should seek independent legal advice as soon as possible.

Hearing Date

The exact date within the three-day window on which the Review Hearing will be heard has not yet been confirmed by the Court. Once confirmed, this information will be available via HM Courts & Tribunals Service's published court listings for the Business and Property Division at https://www.court-tribunal-hearings.service.gov.uk/summary-of-publications?locationId=111

Alternatively, if you provide us with an email address, we will notify you of the specific hearing date as soon as we are informed of it by the Court.

Email correspondence

If you wish to be served by email or if you instruct a solicitor to act for you in these proceedings, please provide the relevant details to us at mooglegal@moog.com and we will arrange for future documents to be served accordingly.

Yours sincerely,

Moog Inc.

Encs.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Moog Inc.
400 Jamison Rd. • East Aurora, NY 14052-0018
Telephone: +1-716 652-2000

MOOG

BY FIRST CLASS POST

Iain Evans
[redacted]

3 November 2026

Dear Iain Evans,

IN THE HIGH COURT OF JUSTICE, BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES, PROPERTY, TRUSTS AND PROBATE LIST (ChD)

CLAIM NO. PT-2025-000910

(1) MOOG WOLVERHAMPTON LIMITED AND OTHERS v (1) PERSONS UNKNOWN AND OTHERS

We are the Claimants in the above civil proceedings.

We write further to our previous correspondence concerning these proceedings, including our letter of 13 October 2026 enclosing a bundle of documents which comprised, by way of service, the Joinder Application (as defined in that letter) and other documents filed in the proceedings, and subsequent letter of 30 October 2026 which requested your confirmation to agreement that the Joinder Application would be heard at the Review Hearing, as requested by the court on the sealed notice for the Joinder Application. Please note that the Claimants will be asking the court to hear the Joinder Application at the Review Hearing in any event. Should you require further copies of any of this correspondence, please feel free to contact us at the email address below.

We hereby enclose, by way of service, further evidence in support of the review of the Injunction Order (the **"Further Evidence"**). You will be aware that the review hearing for the Injunction Order is listed to take place in a three-day window between 18 November 2026 and 20 November 2026, with a time estimate of half a day.

The further evidence comprises the sixth witness statement of Elwira Kelly dated 3 November 2026 **("Kelly 6"),** together with a bundle of documents comprising Exhibit EK6.

We also enclose a revised version of the Draft Amended Injunction Order including the Named Defendants. This is the proposed order sought in connection with the Claimants' application to join the Named Defendants to these proceedings and review the existing injunction. The order has been revised since it was first provided to you, and we therefore enclose the updated version for completeness. Moog will be asking the court to make an order in these terms at the review hearing.

The Further Evidence has been filed with the court. It has also been uploaded to the following website: www.moog.co.uk/injunction.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

As explained in previous correspondence, the website also contains documents which are relevant to the injunction and the underlying proceedings. We would encourage you to review these documents.

Right to apply

We remind you that you are entitled to apply to the Court to set aside or vary the Alternative Means Order (as defined in our previous correspondence), pursuant to CPR r.23.10. You may also wish to seek your own independent legal advice in relation to these proceedings and the matters referred to in this letter. Should you wish to object to the relief sought by the Claimants, you should seek independent legal advice as soon as possible.

Hearing Date

The exact date within the three-day window on which the Review Hearing will be heard has not yet been confirmed by the Court. Once confirmed, this information will be available via HM Courts & Tribunals Service's published court listings for the Business and Property Division at https://www.court-tribunal-hearings.service.gov.uk/summary-of-publications?locationId=111

Alternatively, if you provide us with an email address, we will notify you of the specific hearing date as soon as we are informed of it by the Court.

Email correspondence

If you wish to be served by email or if you instruct a solicitor to act for you in these proceedings, please provide the relevant details to us at mooglegal@moog.com and we will arrange for future documents to be served accordingly.

Yours sincerely,

Moog Inc.

Encs.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE



Vandals targeted vehicles belonging to an engineer at Leonardo

Pro-Palestine activists vandalise homes of defence bosses

The group calling itself The List has published images of the attacks online, warning employees to quit their jobs or risk a visit

Dipesh Gadher, Home Affairs Correspondent

Saturday October 17 2026, 9.05pm, The Sunday Times

Listen • 6:57 min | Share | Save

Pro-Palestine activists are targeting defence company executives at their family homes in an escalation of tactics directed at those they accuse of aiding Israel's military.

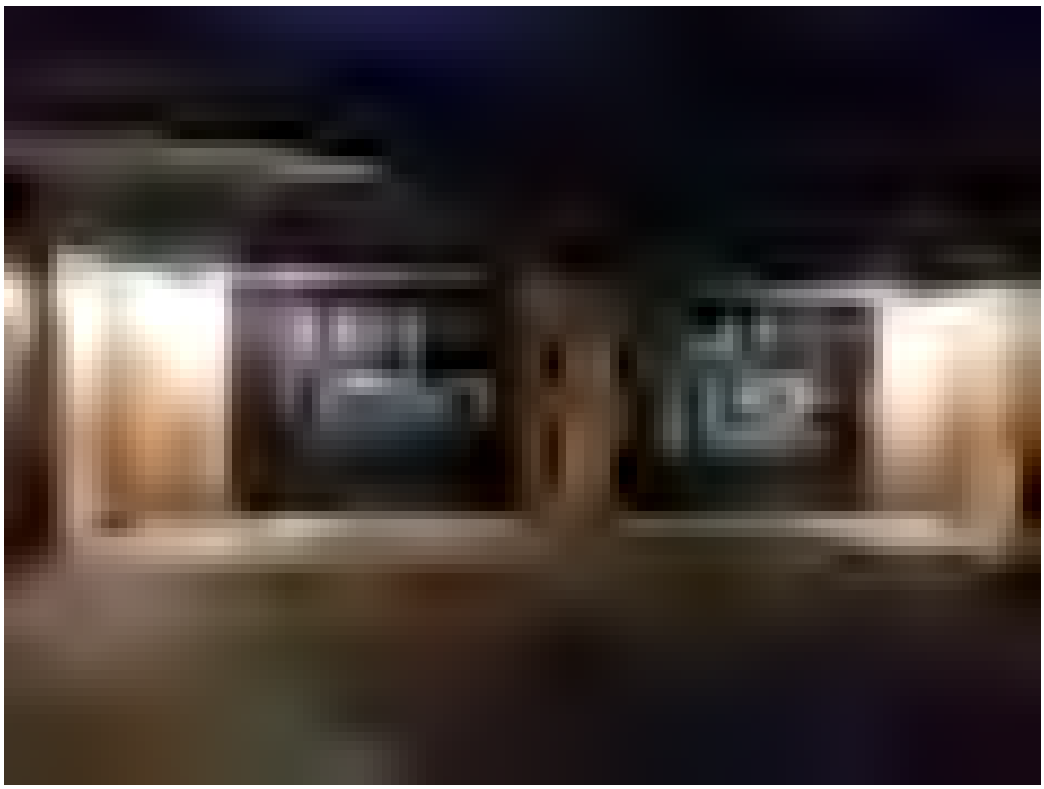
Police are investigating a spate of incidents in recent weeks in which hooded individuals from a group calling itself The List have vandalised properties and vehicles in the night. Activists slashed a female executive's car tyres and threw red paint across the front of her house. In another case the phrase "baby killers" was sprayed across a garage door in an apparent reference to children killed by Israeli airstrikes on Gaza.

Counterterrorism officers are understood to be helping local forces where criminal damage has occurred and could eventually end up leading a UK-wide investigation.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE



The group has shared footage of its attacks online



The decision to threaten and intimidate British defence company staff at their homes is a marked shift in strategy by pro-Palestine activists, such as the banned group Palestine Action, which has mainly targeted manufacturing sites or defence facilities in the past. The new tactics are reminiscent of animal rights extremists who firebombed and vandalised the homes of directors and investors linked to Huntingdon Life Sciences, Europe's biggest animal testing laboratory, in the 2000s.

The List claims to have targeted more than half a dozen senior employees linked to defence firms in the UK including Elbit Systems, the Israeli weapons giant. It has posted images of the attacks on a website registered in Iceland, which has stringent privacy laws. It tells supporters the "most secure and private way" of contacting the group is via SimpleX, an encrypted messaging app.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

ADVERTISEMENT

The group says on the site: “Through research, hacking, whistleblowers and leaks we have built up an extensive bank of addresses and personal information of those whose lives are dedicated to the Palestinian people. Our 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.”

Last weekend the group struck at three separate locations. In Fleet, Hampshire, a hooded individual appears to have slashed the tyres of a car parked outside the home of a female executive from Ultra Intelligence & Communications (Ultra I&C), which reportedly supplies military hardware to Elbit. The woman’s house was also defaced.

Hampshire and Isle of Wight Constabulary said: “We were called on Saturday, October 10, to a report of a criminal damage incident in Fleet. It was reported that red paint had been thrown across the front of the house and two car tyres had been damaged at around 3.30am. Our inquiries remain ongoing.”

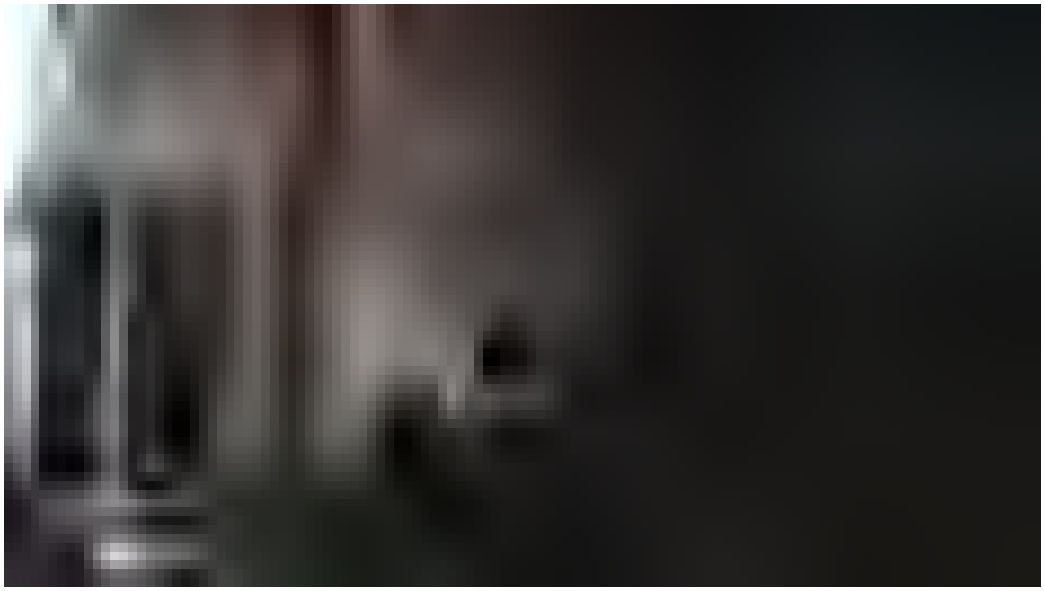
Activists separately targeted what they describe as a “key engineer” working in Edinburgh for Leonardo UK, which manufacturers laser targeting systems for F-35 fighters flown by the Israeli military. Footage posted online shows a masked and hooded figure spraying red paint over three vehicles parked in the driveway of the employee in Dunfermline, Fife.

Another individual filmed the offence, which took place in the early hours last Sunday. The engineer is not thought to be a director at Leonardo so their address would not be listed on publicly available companies’ information. It raises the alarming prospect that activists could have followed them home from work or tracked them down through social media posts.

ADVERTISEMENT

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

The home of a male executive at Keysight Technologies, which provides parts for Elbit drones, was targeted in South Queensferry, just outside Edinburgh, on the same night.



Activists targeted the home of a Keysight Technologies executive

Police Scotland said the force was investigating two separate reports of "vandalism" to properties and cars in the Dunfermline and South Queensferry areas. It is understood that counterterrorism officers are assisting the investigation by Police Scotland and have provided security advice to the defence companies involved.

Leonardo said: "The safety and wellbeing of our employees is an absolute priority and we are providing support to the individual affected. We are also assisting counterterrorism police with their ongoing investigation." Keysight Technologies and Ultra I&C did not respond to a request for comment.

On Saturday, Lord Walney, the government's former adviser on political violence and disruption, condemned The List's intimidatory tactics and called on the government to take action.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

"This disturbing and inexcusable behaviour puts individuals serving their country and their families at risk and seeks to undermine Britain's vital defence industry," he said. "The List is a sinister escalation of Palestine Action's playbook who themselves have targeted individuals working with Elbit in the past.

ADVERTISEMENT

"Ministers should be ready to move swiftly against this group as a Palestine Action spin-off and must not buckle to the activists claiming the group's strategy of criminal direct action and violence is just harmless protest."

This weekend it remained unclear if The List was an offshoot or affiliate of Palestine Action, which was proscribed by the Home Office as a terrorist organisation in July last year after its members broke into RAF Brize Norton in Oxfordshire and sprayed red paint into the engines of two Voyager aircraft. Palestine Action activists also raided an Elbit factory near Bristol in August 2024. A police officer was struck by a sledgehammer during the incident, which caused more than £1m of damage.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

National Protests at Elbit Systems

POSTED ON OCTOBER 21, 2026



Accept

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

When

21/10/2026
11:00 am - 1:00 pm
Add To Calendar

Join us on Weds 21 October to protest at Elbit Systems' facilities in Bristol and Shenstone. Demand a comprehensive two-way arms embargo on Israel now.

Bristol: Assemble at 11am at Elbit Systems, 38 Bolingbroke Way, Bristol, BS34 6FE.

Shenstone: Assemble at 11am UAV Engines Ltd, Lynn Lane, Shenstone, WS14 0EA.

Find transport information here.

Elbit Systems is Israel's largest weapons company. It manufactures weapons and military technology used by Israel in its ongoing genocide in the Gaza Strip, and military assaults and ethnic cleansing across the West Bank. This includes armed drones, missiles, bombs and artillery shells.

The British government allows Elbit Systems to operate factories and research facilities in this country and grants it licenses to export weapons components to Israel. These sites also produce goods sold to the British military, generating profits used by the company to manufacture more weapons for Israel.

The British government has said it will "refuse all licence applications for arms and other exports that materially contribute to the occupation", but this falls far short of what is required. It must impose a comprehensive two-way arms embargo on Israel. It's also said it will take action against specific companies enabling Israel's illegal settlements. This must mean shutting down Elbit Systems' sites in Britain.

Palestinians call on people in Britain to protest against arms companies that enable and profit from Israel's crimes, and to demand that the government impose a comprehensive arms embargo on Israel, in line with its legal obligations not to aid or assist genocide, military occupation and apartheid.

Join us on Weds 21 October in Bristol or Shenstone.

Transport

Bristol:

Public Transport: Trains run from Bristol Temple Meads to Patchway (15 mins walk from the protest) every hour.

Accept

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Coaches: Coach from London (departing at 7.15am, pick-up at Victoria Embankment). Book your ticket here. (https://www.eventbrite.co.uk/e/coach-from-london-to-protest-at-elbit-systems-tickets-2001872813474?aff=oddtdtcreator)

Shenstone:

Public Transport: Shenstone train station is a 5 minute walk from the protest location.

YOUTUBE (HTTPS://WWW.YOUTUBE.COM/@PALESTINESOLIDARITYCAMPAIGN/VIDEOS)

BLUESKY (HTTPS://BSKY.APP/PROFILE/PSCUPDATES.BSKY.SOCIAL)

INSTAGRAM (HTTPS://WWW.INSTAGRAM.COM/PALESTINESOLIDARITYUK/?HL=EN)

TIKTOK (HTTPS://WWW.TIKTOK.COM/@PALESTINESOLIDARITYUK)

TWITTER / X (HTTP://WWW.TWITTER.COM/PSCUPDATES)

FACEBOOK (HTTPS://WWW.FACEBOOK.COM/PALESTINESOLIDARITYUK/)

PALESTINE SOLIDARITY CAMPAIGN

ADDRESS

Palestine Solidarity Campaign
Box BM PSA
London
WC1N 3XX

ABOUT

About us
(https://palestinecampaign.org/about)
Our aims
(https://palestinecampaign.org/about/aims/)
Opportunities
(https://palestinecampaign.org/about/opportuniti

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

More than 300 arrests at Palestine Action support protest outside US embassy



PRESS ASSOCIATION

Some protesters were carried away by police after refusing to walk when arrested

Tom Symonds >
News correspondent

1 November 2026

More than 300 people have been arrested during a protest supporting the banned Palestine Action group outside the US embassy, police have said.

Docusign Envelope ID: 76A7F76C-DDB6-8571-813F-D8823FD015BE

Hundreds of people gathered at Nine Elms in London on Saturday, with many holding signs reading phrases such as: "I oppose genocide, I support Palestine Action."

The Metropolitan Police said on Sunday that 325 arrests were made. The force added on social media that 320 of them were for "expressing support for a proscribed organisation under the Terrorism Act".

At least 4,000 arrests have been made in relation to the group, which was proscribed in July 2025.

The UK Supreme Court is due to **review Palestine Action's ban under terrorism legislation**, after the group's co-founder was granted permission to appeal it.

The Home Office has said that it will robustly defend against the appeal.

Officers on Saturday made arrests into the evening, taking people to police vans for transfer, to the applause of many protesters, some of whom chanted: "Free, free Palestine."

In some instances, officers had to carry demonstrators who refused to walk.

Retired lawyer Charles Allison - who was taken by police in the afternoon - had travelled from Cumbria to participate. He said he feared for people's civil liberties, which he said were "being devalued and watered down".

"I hope the Supreme Court justices - they won't necessarily be influenced by it [the protest] - but I hope that they will take a long-term view of what is happening in this country and decide that the proscription was unlawful, as I believe it was," the 75-year-old said.

David Bolden, another protester awaiting arrest called the ban an "absurd law".

Defend Our Juries, which has been co-ordinating a series of protests over the ban, said the number of people detained this weekend took the total over 4,000 arrests since the group was proscribed, calling it "truly dystopian".

According to Home Office figures seen by the BBC, 3,630 arrests were made in the year ending June 2026. Along with the 134 people arrested outside Westminster Magistrates Court earlier this year and those on Saturday brings the total up to 4,089.

The BBC has contacted the Met to confirm any figures it might hold.

Amnesty International UK has criticised the arrests and called for the government to drop the proscription of Palestine Action.

Defend Our Juries called the arrests "unjust" and an assault on free speech.

Moog Inc.
400 Jamison Rd. • East Aurora, NY 14052-0018
Telephone: +1-716 652-2000

MOOG

BY HAND AND FIRST CLASS POST

Bea Sherman (also known as Frank Sherman)
[redacted]

Dear Bea Sherman,

IN THE HIGH COURT OF JUSTICE, BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES, PROPERTY, TRUSTS AND PROBATE LIST (ChD)

CLAIM NO. PT-2025-000910

(1) MOOG WOLVERHAMPTON LIMITED AND OTHERS v (1) PERSONS UNKNOWN AND OTHERS

We are the Claimants in the above civil proceedings.

We are writing to you because the Claimants intend to apply to join you to these proceedings as a defendant pursuant to Part 19 of the Civil Procedure Rules, for the reasons explained below. This letter, and the documents enclosed with it, are served on you pursuant to an order of Master McQuail dated 3 September 2026 (the **"Alternative Means Order"**), a copy of which is enclosed, by way of service.

Background

On 6 October 2025, the Claimants were granted an injunction over five sites operated by the Claimants (the **"Sites"**), on the terms of an order of the Honourable Mr Justice Thompsell dated 6 October 2025 (the **"Injunction Order"**). The Injunction Order was granted against Persons Unknown and provides, at paragraph 7, for the injunction to be reviewed annually.

The Claimants have applied to Court for a review of the injunction (the **"Review Application"**). A hearing of the Review Application has been listed in a three-day window from 18 November 2026 onwards. Alongside the Review Application, the Claimants have also applied: (i) to join you, together with three other named individuals, to the Claim as defendants pursuant to CPR 19.2; and (ii) to make consequential amendments to the Claimants' Re-Amended Claim Form and Re-Amended Particulars of Claim; and (iv) if required in addition to the Review Application, to formally review the Injunction Order (the "**Joinder Application"**).

The Alternative Means Order permits the Claimants to serve the Joinder Application, the Review Application and the other documents referred to in that Order on you by alternative means, including by posting those documents to you at this address and by uploading them to the website referred to below. This letter, together with the documents enclosed with it and listed below, constitutes service by post pursuant to paragraph 1(i) of the Alternative Means Order.

Enclosed documents

In accordance with paragraph 5 of the Alternative Means Order, we enclose:

The Joinder Application

a) The application documents for the Joinder Application, namely:

i. The Claimants' application notice dated 2nd October 2026;

ii. The draft amended Claim Form and draft amended Particulars of Claim;

iii. The draft order; and

iv. The fifth witness statement of Elwira Kelly dated 2nd October 2026 and its exhibit.

The Review Application

b) The application documents for the Review Application, namely:

i. The Claimants' application notice dated 28 July 2026; and

ii. Notice of Hearing.

The Alternative Means Order

c) The application documents for the Alternative Means Order, namely:

i. the Claimants' Application Notice dated 28 July 2026;

ii. the accompanying Fourth Witness Statement of Elwira Kelly dated 28 July 2026 and its exhibit; and

iii. the Alternative Means Order dated 3 September 2026.

For completeness, we also include all other documents previously filed by the Claimants in these proceedings.

Further documents relevant to the injunction

Pursuant to paragraph 1(ii) of the Alternative Means Order, the documents referred to above (other than Schedule 1 to the Alternative Means Order, which contains the postal addresses of the Named Defendants) have also been uploaded to the following website: www.moog.co.uk/injunction.

That website also contains documents which are relevant to the injunction and the underlying proceedings, and which you may also wish to review at this stage.

Right to apply

You are entitled to apply to the Court to set aside or vary the Alternative Means Order, pursuant to CPR r.23.10. You may also wish to seek your own independent legal advice in relation to these proceedings and the matters referred to in this letter.

Hearing Date

The exact date within the three-day window on which the Review Hearing will be heard has not yet been confirmed by the Court. Once confirmed, this information will be available via HM Courts & Tribunals Service's published court listings for the Business and Property Division at https://www.court-tribunal-hearings.service.gov.uk/summary-of-publications?locationId=111.

Alternatively, if you provide us with an email address, we will notify you of the specific hearing date as soon as we are informed of it by the Court.

Service of further evidence

Please note that, pursuant to paragraph 7 of the Injunction Order, the Claimants are permitted to file and serve any evidence in support 14 days before the Review Hearing. We may therefore serve further evidence on you in advance of the Review Hearing.

If you wish to be served by email or if you instruct a solicitor to act for you in these proceedings, please provide the relevant details to us at mooglegal@moog.com and we will arrange for future documents to be served accordingly, in accordance with paragraph 1(iv) and (v) of the Alternative Means Order.

Yours sincerely,

Moog Inc.

Encs.

Moog Inc.
400 Jamison Rd. • East Aurora, NY 14052-0018
Telephone: +1-716 652-2000

MOOG

BY HAND AND FIRST CLASS POST

Hanah Yun Stevens
[redacted]

Dear Hannah Yun Stevens,

IN THE HIGH COURT OF JUSTICE, BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES, PROPERTY, TRUSTS AND PROBATE LIST (ChD)

CLAIM NO. PT-2025-000910

(1) MOOG WOLVERHAMPTON LIMITED AND OTHERS v (1) PERSONS UNKNOWN AND OTHERS

We are the Claimants in the above civil proceedings.

We are writing to you because the Claimants intend to apply to join you to these proceedings as a defendant pursuant to Part 19 of the Civil Procedure Rules, for the reasons explained below. This letter, and the documents enclosed with it, are served on you pursuant to an order of Master McQuail dated 3 September 2026 (the **"Alternative Means Order"**), a copy of which is enclosed, by way of service.

Background

On 6 October 2025, the Claimants were granted an injunction over five sites operated by the Claimants (the **"Sites"**), on the terms of an order of the Honourable Mr Justice Thompsell dated 6 October 2025 (the **"Injunction Order"**). The Injunction Order was granted against Persons Unknown and provides, at paragraph 7, for the injunction to be reviewed annually.

The Claimants have applied to Court for a review of the injunction (the **"Review Application"**). A hearing of the Review Application has been listed in a three-day window from 18 November 2026 onwards. Alongside the Review Application, the Claimants have also applied: (i) to join you, together with three other named individuals, to the Claim as defendants pursuant to CPR 19.2; and (ii) to make consequential amendments to the Claimants' Re-Amended Claim Form and Re-Amended Particulars of Claim; and (iv) if required in addition to the Review Application, to formally review the Injunction Order (the "**Joinder Application"**).

The Alternative Means Order permits the Claimants to serve the Joinder Application, the Review Application and the other documents referred to in that Order on you by alternative means, including by posting those documents to you at this address and by uploading them to the website referred to below. This letter, together with the documents enclosed with it and listed below, constitutes service by post pursuant to paragraph 1(i) of the Alternative Means Order.

Enclosed documents

In accordance with paragraph 5 of the Alternative Means Order, we enclose:

The Joinder Application

a) The application documents for the Joinder Application, namely:

i. The Claimants' application notice dated 2nd October 2026;

ii. The draft amended Claim Form and draft amended Particulars of Claim;

iii. The draft order; and

iv. The fifth witness statement of Elwira Kelly dated 2nd October 2026 and its exhibit.

The Review Application

b) The application documents for the Review Application, namely:

i. The Claimants' application notice dated 28 July 2026; and

ii. Notice of Hearing.

The Alternative Means Order

c) The application documents for the Alternative Means Order, namely:

i. the Claimants' Application Notice dated 28 July 2026;

ii. the accompanying Fourth Witness Statement of Elwira Kelly dated 28 July 2026 and its exhibit; and

iii. the Alternative Means Order dated 3 September 2026.

For completeness, we also include all other documents previously filed by the Claimants in these proceedings.

Further documents relevant to the injunction

Pursuant to paragraph 1(ii) of the Alternative Means Order, the documents referred to above (other than Schedule 1 to the Alternative Means Order, which contains the postal addresses of the Named Defendants) have also been uploaded to the following website: www.moog.co.uk/injunction.

That website also contains documents which are relevant to the injunction and the underlying proceedings, and which you may also wish to review at this stage.

Right to apply

You are entitled to apply to the Court to set aside or vary the Alternative Means Order, pursuant to CPR r.23.10. You may also wish to seek your own independent legal advice in relation to these proceedings and the matters referred to in this letter.

Hearing Date

The exact date within the three-day window on which the Review Hearing will be heard has not yet been confirmed by the Court. Once confirmed, this information will be available via HM Courts & Tribunals Service's published court listings for the Business and Property Division at https://www.court-tribunal-hearings.service.gov.uk/summary-of-publications?locationId=111.

Alternatively, if you provide us with an email address, we will notify you of the specific hearing date as soon as we are informed of it by the Court.

Service of further evidence

Please note that, pursuant to paragraph 7 of the Injunction Order, the Claimants are permitted to file and serve any evidence in support 14 days before the Review Hearing. We may therefore serve further evidence on you in advance of the Review Hearing.

If you wish to be served by email or if you instruct a solicitor to act for you in these proceedings, please provide the relevant details to us at mooglegal@moog.com and we will arrange for future documents to be served accordingly, in accordance with paragraph 1(iv) and (v) of the Alternative Means Order.

Yours sincerely,

Moog Inc.

Encs.

Moog Inc.
400 Jamison Rd. • East Aurora, NY 14052-0018
Telephone: +1-716 652-2000

MOOG

BY HAND AND FIRST CLASS POST

Hisham Alkhamesi
[redacted]

Dear Hisham Alkhamesi,

IN THE HIGH COURT OF JUSTICE, BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES, PROPERTY, TRUSTS AND PROBATE LIST (ChD)

CLAIM NO. PT-2025-000910

(1) MOOG WOLVERHAMPTON LIMITED AND OTHERS v (1) PERSONS UNKNOWN AND OTHERS

We are the Claimants in the above civil proceedings.

We are writing to you because the Claimants intend to apply to join you to these proceedings as a defendant pursuant to Part 19 of the Civil Procedure Rules, for the reasons explained below. This letter, and the documents enclosed with it, are served on you pursuant to an order of Master McQuail dated 3 September 2026 (the **"Alternative Means Order"**), a copy of which is enclosed, by way of service.

Background

On 6 October 2025, the Claimants were granted an injunction over five sites operated by the Claimants (the **"Sites"**), on the terms of an order of the Honourable Mr Justice Thompsell dated 6 October 2025 (the **"Injunction Order"**). The Injunction Order was granted against Persons Unknown and provides, at paragraph 7, for the injunction to be reviewed annually.

The Claimants have applied to Court for a review of the injunction (the **"Review Application"**). A hearing of the Review Application has been listed in a three-day window from 18 November 2026 onwards. Alongside the Review Application, the Claimants have also applied: (i) to join you, together with three other named individuals, to the Claim as defendants pursuant to CPR 19.2; and (ii) to make consequential amendments to the Claimants' Re-Amended Claim Form and Re-Amended Particulars of Claim; and (iv) if required in addition to the Review Application, to formally review the Injunction Order (the "**Joinder Application"**).

The Alternative Means Order permits the Claimants to serve the Joinder Application, the Review Application and the other documents referred to in that Order on you by alternative means, including by posting those documents to you at this address and by uploading them to the website referred to below. This letter, together with the documents enclosed with it and listed below, constitutes service by post pursuant to paragraph 1(i) of the Alternative Means Order.

Enclosed documents

In accordance with paragraph 5 of the Alternative Means Order, we enclose:

The Joinder Application

a) The application documents for the Joinder Application, namely:

i. The Claimants' application notice dated 2nd October 2026;

ii. The draft amended Claim Form and draft amended Particulars of Claim;

iii. The draft order; and

iv. The fifth witness statement of Elwira Kelly dated 2nd October 2026 and its exhibit.

The Review Application

b) The application documents for the Review Application, namely:

i. The Claimants' application notice dated 28 July 2026; and

ii. Notice of Hearing.

The Alternative Means Order

c) The application documents for the Alternative Means Order, namely:

i. the Claimants' Application Notice dated 28 July 2026;

ii. the accompanying Fourth Witness Statement of Elwira Kelly dated 28 July 2026 and its exhibit; and

iii. the Alternative Means Order dated 3 September 2026.

For completeness, we also include all other documents previously filed by the Claimants in these proceedings.

Further documents relevant to the injunction

Pursuant to paragraph 1(ii) of the Alternative Means Order, the documents referred to above (other than Schedule 1 to the Alternative Means Order, which contains the postal addresses of the Named Defendants) have also been uploaded to the following website: www.moog.co.uk/injunction.

That website also contains documents which are relevant to the injunction and the underlying proceedings, and which you may also wish to review at this stage.

Right to apply

You are entitled to apply to the Court to set aside or vary the Alternative Means Order, pursuant to CPR r.23.10. You may also wish to seek your own independent legal advice in relation to these proceedings and the matters referred to in this letter.

Hearing Date

The exact date within the three-day window on which the Review Hearing will be heard has not yet been confirmed by the Court. Once confirmed, this information will be available via HM Courts & Tribunals Service's published court listings for the Business and Property Division at https://www.court-tribunal-hearings.service.gov.uk/summary-of-publications?locationId=111.

Alternatively, if you provide us with an email address, we will notify you of the specific hearing date as soon as we are informed of it by the Court.

Service of further evidence

Please note that, pursuant to paragraph 7 of the Injunction Order, the Claimants are permitted to file and serve any evidence in support 14 days before the Review Hearing. We may therefore serve further evidence on you in advance of the Review Hearing.

If you wish to be served by email or if you instruct a solicitor to act for you in these proceedings, please provide the relevant details to us at mooglegal@moog.com and we will arrange for future documents to be served accordingly, in accordance with paragraph 1(iv) and (v) of the Alternative Means Order.

Yours sincerely,

Moog Inc.

Encs.

Moog Inc.
400 Jamison Rd. • East Aurora, NY 14052-0018
Telephone: +1-716 652-2000

MOOG

BY HAND AND FIRST CLASS POST

Iain Evans
[redacted]

Dear Iain Evans,

IN THE HIGH COURT OF JUSTICE, BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES, PROPERTY, TRUSTS AND PROBATE LIST (ChD)

CLAIM NO. PT-2025-000910

(1) MOOG WOLVERHAMPTON LIMITED AND OTHERS v (1) PERSONS UNKNOWN AND OTHERS

We are the Claimants in the above civil proceedings.

We are writing to you because the Claimants intend to apply to join you to these proceedings as a defendant pursuant to Part 19 of the Civil Procedure Rules, for the reasons explained below. This letter, and the documents enclosed with it, are served on you pursuant to an order of Master McQuail dated 3 September 2026 (the **"Alternative Means Order"**), a copy of which is enclosed, by way of service.

Background

On 6 October 2025, the Claimants were granted an injunction over five sites operated by the Claimants (the **"Sites"**), on the terms of an order of the Honourable Mr Justice Thompsell dated 6 October 2025 (the **"Injunction Order"**). The Injunction Order was granted against Persons Unknown and provides, at paragraph 7, for the injunction to be reviewed annually.

The Claimants have applied to Court for a review of the injunction (the **"Review Application"**). A hearing of the Review Application has been listed in a three-day window from 18 November 2026 onwards. Alongside the Review Application, the Claimants have also applied: (i) to join you, together with three other named individuals, to the Claim as defendants pursuant to CPR 19.2; and (ii) to make consequential amendments to the Claimants' Re-Amended Claim Form and Re-Amended Particulars of Claim; and (iv) if required in addition to the Review Application, to formally review the Injunction Order (the "**Joinder Application"**).

The Alternative Means Order permits the Claimants to serve the Joinder Application, the Review Application and the other documents referred to in that Order on you by alternative means, including by posting those documents to you at this address and by uploading them to the website referred to below. This letter, together with the documents enclosed with it and listed below, constitutes service by post pursuant to paragraph 1(i) of the Alternative Means Order.

Enclosed documents

In accordance with paragraph 5 of the Alternative Means Order, we enclose:

The Joinder Application

a) The application documents for the Joinder Application, namely:

i. The Claimants' application notice dated 2nd October 2026;

ii. The draft amended Claim Form and draft amended Particulars of Claim;

iii. The draft order; and

iv. The fifth witness statement of Elwira Kelly dated 2nd October 2026 and its exhibit.

The Review Application

b) The application documents for the Review Application, namely:

i. The Claimants' application notice dated 28 July 2026; and

ii. Notice of Hearing.

The Alternative Means Order

c) The application documents for the Alternative Means Order, namely:

i. the Claimants' Application Notice dated 28 July 2026;

ii. the accompanying Fourth Witness Statement of Elwira Kelly dated 28 July 2026 and its exhibit; and

iii. the Alternative Means Order dated 3 September 2026.

For completeness, we also include all other documents previously filed by the Claimants in these proceedings.

Further documents relevant to the injunction

Pursuant to paragraph 1(ii) of the Alternative Means Order, the documents referred to above (other than Schedule 1 to the Alternative Means Order, which contains the postal addresses of the Named Defendants) have also been uploaded to the following website: www.moog.co.uk/injunction.

That website also contains documents which are relevant to the injunction and the underlying proceedings, and which you may also wish to review at this stage.

Right to apply

You are entitled to apply to the Court to set aside or vary the Alternative Means Order, pursuant to CPR r.23.10. You may also wish to seek your own independent legal advice in relation to these proceedings and the matters referred to in this letter.

Hearing Date

The exact date within the three-day window on which the Review Hearing will be heard has not yet been confirmed by the Court. Once confirmed, this information will be available via HM Courts & Tribunals Service's published court listings for the Business and Property Division at https://www.court-tribunal-hearings.service.gov.uk/summary-of-publications?locationId=111.

Alternatively, if you provide us with an email address, we will notify you of the specific hearing date as soon as we are informed of it by the Court.

Service of further evidence

Please note that, pursuant to paragraph 7 of the Injunction Order, the Claimants are permitted to file and serve any evidence in support 14 days before the Review Hearing. We may therefore serve further evidence on you in advance of the Review Hearing.

If you wish to be served by email or if you instruct a solicitor to act for you in these proceedings, please provide the relevant details to us at mooglegal@moog.com and we will arrange for future documents to be served accordingly, in accordance with paragraph 1(iv) and (v) of the Alternative Means Order.

Yours sincerely,

Moog Inc.

Encs.

Moog Inc.
400 Jamison Rd. • East Aurora, NY 14052-0018
Telephone: +1-716 652-2000

MOOG

BY FIRST CLASS POST

Bea Sherman (also known as Frank Sherman)
[redacted]

Dear Bea Sherman,

IN THE HIGH COURT OF JUSTICE, BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES, PROPERTY, TRUSTS AND PROBATE LIST (ChD)

CLAIM NO. PT-2025-000910

(1) MOOG WOLVERHAMPTON LIMITED AND OTHERS v (1) PERSONS UNKNOWN AND OTHERS

As you are aware, we are the Claimants in the above civil proceedings.

The bundle of documents served on you previously contained an application notice dated 2 October 2026 and sealed by the court on 5 October 2026, by which the Claimants have sought an order from the court to join you, together with three other named individuals, as defendants to the above proceedings, and to consequently amend the Claimants' Amended Claim Form and Re-Amended Particulars of Claim (the "**Joinder Application**"). A further copy of the sealed Joinder Application notice is enclosed.

As you will be aware, the hearing of the review of the Claimants' injunction has been listed in a three-day window from 18 November 2026, with a time estimate of 2 hours and 30 minutes (the "**Review Hearing**").

To ensure the most efficient use of the court's time and parties' costs, the Claimants have requested that the Joinder Application is heard at the Review Hearing as opposed to a separate hearing.

The sealed notice for the Joinder Application includes a statement from the court that the Joinder Application has been listed as requested during the Review Hearing on the basis that it is agreed by both parties and does not increase the time estimate of the existing hearing.

The Claimants do not consider that the hearing of the Joinder Application at the Review Hearing will increase the time estimate of the existing hearing.

By return, we ask that you confirm your consent, as one of the defendant parties to the Joinder Application and as requested by the court, to the Joinder Application being heard at the Review Hearing. Please confirm this agreement either by email to mooglegal@moog.com or in writing to the court, copying mooglegal@moog.com in any correspondence.

Yours sincerely,

Moog Inc.

Encs.

Moog Inc.
400 Jamison Rd. • East Aurora, NY 14052-0018
Telephone: +1-716 652-2000

MOOG

BY FIRST CLASS POST

Hanah Yun Stevens
[redacted]

Dear Hannah Yun Stevens,

IN THE HIGH COURT OF JUSTICE, BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES, PROPERTY, TRUSTS AND PROBATE LIST (ChD)

CLAIM NO. PT-2025-000910

(1) MOOG WOLVERHAMPTON LIMITED AND OTHERS v (1) PERSONS UNKNOWN AND OTHERS

As you are aware, we are the Claimants in the above civil proceedings.

The bundle of documents served on you previously contained an application notice dated 2 October 2026 and sealed by the court on 5 October 2026, by which the Claimants have sought an order from the court to join you, together with three other named individuals, as defendants to the above proceedings, and to consequently amend the Claimants' Amended Claim Form and Re-Amended Particulars of Claim (the "**Joinder Application**"). A further copy of the sealed Joinder Application notice is enclosed.

As you will be aware, the hearing of the review of the Claimants' injunction has been listed in a three-day window from 18 November 2026, with a time estimate of 2 hours and 30 minutes (the "**Review Hearing**").

To ensure the most efficient use of the court's time and parties' costs, the Claimants have requested that the Joinder Application is heard at the Review Hearing as opposed to a separate hearing.

The sealed notice for the Joinder Application includes a statement from the court that the Joinder Application has been listed as requested during the Review Hearing on the basis that it is agreed by both parties and does not increase the time estimate of the existing hearing.

The Claimants do not consider that the hearing of the Joinder Application at the Review Hearing will increase the time estimate of the existing hearing.

By return, we ask that you confirm your consent, as one of the defendant parties to the Joinder Application and as requested by the court, to the Joinder Application being heard at the Review Hearing. Please confirm this agreement either by email to mooglegal@moog.com or in writing to the court, copying mooglegal@moog.com in any correspondence.

Yours sincerely,

Moog Inc.

Encs.

Moog Inc.
400 Jamison Rd. • East Aurora, NY 14052-0018
Telephone: +1-716 652-2000

MOOG

BY FIRST CLASS POST

Hisham Alkhamesi
[redacted]

Dear Hisham Alkhamesi,

IN THE HIGH COURT OF JUSTICE, BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES, PROPERTY, TRUSTS AND PROBATE LIST (ChD)

CLAIM NO. PT-2025-000910

(1) MOOG WOLVERHAMPTON LIMITED AND OTHERS v (1) PERSONS UNKNOWN AND OTHERS

As you are aware, we are the Claimants in the above civil proceedings.

The bundle of documents served on you previously contained an application notice dated 2 October 2026 and sealed by the court on 5 October 2026, by which the Claimants have sought an order from the court to join you, together with three other named individuals, as defendants to the above proceedings, and to consequently amend the Claimants' Amended Claim Form and Re-Amended Particulars of Claim (the "**Joinder Application**"). A further copy of the sealed Joinder Application notice is enclosed.

As you will be aware, the hearing of the review of the Claimants' injunction has been listed in a three-day window from 18 November 2026, with a time estimate of 2 hours and 30 minutes (the "**Review Hearing**").

To ensure the most efficient use of the court's time and parties' costs, the Claimants have requested that the Joinder Application is heard at the Review Hearing as opposed to a separate hearing.

The sealed notice for the Joinder Application includes a statement from the court that the Joinder Application has been listed as requested during the Review Hearing on the basis that it is agreed by both parties and does not increase the time estimate of the existing hearing.

The Claimants do not consider that the hearing of the Joinder Application at the Review Hearing will increase the time estimate of the existing hearing.

By return, we ask that you confirm your consent, as one of the defendant parties to the Joinder Application and as requested by the court, to the Joinder Application being heard at the Review Hearing. Please confirm this agreement either by email to mooglegal@moog.com or in writing to the court, copying mooglegal@moog.com in any correspondence.

Yours sincerely,

Moog Inc.

Encs.

Moog Inc.
400 Jamison Rd. • East Aurora, NY 14052-0018
Telephone: +1-716 652-2000

MOOG

BY FIRST CLASS POST

Iain Evans
[redacted]

Dear Iain Evans,

IN THE HIGH COURT OF JUSTICE, BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES, PROPERTY, TRUSTS AND PROBATE LIST (ChD)

CLAIM NO. PT-2025-000910

(1) MOOG WOLVERHAMPTON LIMITED AND OTHERS v (1) PERSONS UNKNOWN AND OTHERS

As you are aware, we are the Claimants in the above civil proceedings.

The bundle of documents served on you previously contained an application notice dated 2 October 2026 and sealed by the court on 5 October 2026, by which the Claimants have sought an order from the court to join you, together with three other named individuals, as defendants to the above proceedings, and to consequently amend the Claimants' Amended Claim Form and Re-Amended Particulars of Claim (the "**Joinder Application**"). A further copy of the sealed Joinder Application notice is enclosed.

As you will be aware, the hearing of the review of the Claimants' injunction has been listed in a three-day window from 18 November 2026, with a time estimate of 2 hours and 30 minutes (the "**Review Hearing**").

To ensure the most efficient use of the court's time and parties' costs, the Claimants have requested that the Joinder Application is heard at the Review Hearing as opposed to a separate hearing.

The sealed notice for the Joinder Application includes a statement from the court that the Joinder Application has been listed as requested during the Review Hearing on the basis that it is agreed by both parties and does not increase the time estimate of the existing hearing.

The Claimants do not consider that the hearing of the Joinder Application at the Review Hearing will increase the time estimate of the existing hearing.

By return, we ask that you confirm your consent, as one of the defendant parties to the Joinder Application and as requested by the court, to the Joinder Application being heard at the Review Hearing. Please confirm this agreement either by email to mooglegal@moog.com or in writing to the court, copying mooglegal@moog.com in any correspondence.

Yours sincerely,

Moog Inc.

Encs.

Moog Inc.
400 Jamison Rd. • East Aurora, NY 14052-0018
Telephone: +1-716 652-2000

MOOG

BY FIRST CLASS POST

Hanah Yun Stevens
[redacted]

Dear Hannah Yun Stevens,

IN THE HIGH COURT OF JUSTICE, BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES, PROPERTY, TRUSTS AND PROBATE LIST (ChD)

CLAIM NO. PT-2025-000910

(1) MOOG WOLVERHAMPTON LIMITED AND OTHERS v (1) PERSONS UNKNOWN AND OTHERS

As you are aware, we are the Claimants in the above civil proceedings. Further to our previous correspondence, we reiterate that we are seeking an order from the court to join you, together with three other named individuals, as defendants to the above proceedings.

The Joinder Application, along with other documents in the proceedings, were sent to you and the other three defendants on 13 October 2026, by way of service in the form of a bundle of documents and covering letter setting out the documents in the bundle.

We have attempted on multiple occasions to ensure that the bundle of documents reaches you, including by tracking Royal Mail delivery on 14 October 2026 and on 15 October 2026, and by instructing a process server to deliver a copy of the documents by hand on 14 October 2026. There has been no answer at the above address on any of these occasions.

We understand that Royal Mail left a delivery card at this address, explaining that you can either arrange for redelivery of the bundle of documents or collect the documents at the address specified by Royal Mail. Alternatively, should you wish for the documents to be sent to a different address than that listed above, you may contact us at mooglegal@moog.com specifying the address to which you wish the documents to be sent and we will arrange for the same.

All documents in these proceedings can also be found online at https://www.moog.co.uk/injunction.html.

We also refer to our letter sent 30 October 2026, by which we requested confirmation of your consent, as one of the defendant parties to the Joinder Application and as requested by the court, to the Joinder Application being heard at the Review Hearing, notwithstanding that in any event we shall be asking the court to hear the Joinder Application at the Review Hearing on the basis that we consider it to be a proportionate and efficient use of the court's time and that it will not increase the time estimate of the Review Hearing. We understand that Royal Mail has also been unable to deliver this letter to you, and so we enclose a copy of this letter here.

Please be aware that, by posting the documents to the address above and uploading copies of the documents onto the above website, Moog has complied with its obligation to serve the

documents on you. It will therefore proceed with its application to join you to the above proceedings, together with the other named individuals. It intends to ask the court to hear the Joinder Application at the Review Hearing of the proceedings, which is listed for a three-day window between 18-20 November 2026 (inclusive) with a time estimate of half a day.

Yours sincerely,

Moog Inc.

Enc.

Moog Inc.
400 Jamison Rd. • East Aurora, NY 14052-0018
Telephone: +1-716 652-2000

MOOG

BY FIRST CLASS POST

Bea Sherman (also known as Frank Sherman)
[redacted]

3 November 2026

Dear Bea Sherman,

IN THE HIGH COURT OF JUSTICE, BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES, PROPERTY, TRUSTS AND PROBATE LIST (ChD)

CLAIM NO. PT-2025-000910

(1) MOOG WOLVERHAMPTON LIMITED AND OTHERS v (1) PERSONS UNKNOWN AND OTHERS

We are the Claimants in the above civil proceedings.

We write further to our previous correspondence concerning these proceedings, including our letter of 13 October 2026 enclosing a bundle of documents which comprised, by way of service, the Joinder Application (as defined in that letter) and other documents filed in the proceedings, and subsequent letter of 30 October 2026 which requested your confirmation to agreement that the Joinder Application would be heard at the Review Hearing, as requested by the court on the sealed notice for the Joinder Application. Please note that the Claimants will be asking the court to hear the Joinder Application at the Review Hearing in any event. Should you require further copies of any of this correspondence, please feel free to contact us at the email address below.

We hereby enclose, by way of service, further evidence in support of the review of the Injunction Order (the **"Further Evidence"**). You will be aware that the review hearing for the Injunction Order is listed to take place in a three-day window between 18 November 2026 and 20 November 2026, with a time estimate of half a day.

The further evidence comprises the sixth witness statement of Elwira Kelly dated 3 November 2026 **("Kelly 6"),** together with a bundle of documents comprising Exhibit EK6.

We also enclose a revised version of the Draft Amended Injunction Order including the Named Defendants. This is the proposed order sought in connection with the Claimants' application to join the Named Defendants to these proceedings and review the existing injunction. The order has been revised since it was first provided to you, and we therefore enclose the updated version for completeness. Moog will be asking the court to make an order in these terms at the review hearing.

The Further Evidence has been filed with the court. It has also been uploaded to the following website: www.moog.co.uk/injunction.

As explained in previous correspondence, the website also contains documents which are relevant to the injunction and the underlying proceedings. We would encourage you to review these documents.

Right to apply

We remind you that you are entitled to apply to the Court to set aside or vary the Alternative Means Order (as defined in our previous correspondence), pursuant to CPR r.23.10. You may also wish to seek your own independent legal advice in relation to these proceedings and the matters referred to in this letter. Should you wish to object to the relief sought by the Claimants, you should seek independent legal advice as soon as possible.

Hearing Date

The exact date within the three-day window on which the Review Hearing will be heard has not yet been confirmed by the Court. Once confirmed, this information will be available via HM Courts & Tribunals Service's published court listings for the Business and Property Division at https://www.court-tribunal-hearings.service.gov.uk/summary-of-publications?locationId=111

Alternatively, if you provide us with an email address, we will notify you of the specific hearing date as soon as we are informed of it by the Court.

Email correspondence

If you wish to be served by email or if you instruct a solicitor to act for you in these proceedings, please provide the relevant details to us at mooglegal@moog.com and we will arrange for future documents to be served accordingly.

Yours sincerely,

Moog Inc.

Encs.

Moog Inc.
400 Jamison Rd. • East Aurora, NY 14052-0018
Telephone: +1-716 652-2000

MOOG

BY FIRST CLASS POST

Hanah Yun Stevens
[redacted]

3 November 2026

Dear Hanah Yun Stevens,

IN THE HIGH COURT OF JUSTICE, BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES, PROPERTY, TRUSTS AND PROBATE LIST (ChD)

CLAIM NO. PT-2025-000910

(1) MOOG WOLVERHAMPTON LIMITED AND OTHERS v (1) PERSONS UNKNOWN AND OTHERS

We are the Claimants in the above civil proceedings.

We write further to our previous correspondence concerning these proceedings, including our letter of 13 October 2026 enclosing a bundle of documents which comprised, by way of service, the Joinder Application (as defined in that letter) and other documents filed in the proceedings, and subsequent letter of 30 October 2026 which requested your confirmation to agreement that the Joinder Application would be heard at the Review Hearing, as requested by the court on the sealed notice for the Joinder Application. Please note that the Claimants will be asking the court to hear the Joinder Application at the Review Hearing in any event. Should you require further copies of any of this correspondence, please feel free to contact us at the email address below.

We hereby enclose, by way of service, further evidence in support of the review of the Injunction Order (the **"Further Evidence"**). You will be aware that the review hearing for the Injunction Order is listed to take place in a three-day window between 18 November 2026 and 20 November 2026, with a time estimate of half a day.

The further evidence comprises the sixth witness statement of Elwira Kelly dated 3 November 2026 **("Kelly 6"),** together with a bundle of documents comprising Exhibit EK6.

We also enclose a revised version of the Draft Amended Injunction Order including the Named Defendants. This is the proposed order sought in connection with the Claimants' application to join the Named Defendants to these proceedings and review the existing injunction. The order has been revised since it was first provided to you, and we therefore enclose the updated version for completeness. Moog will be asking the court to make an order in these terms at the review hearing.

The Further Evidence has been filed with the court. It has also been uploaded to the following website: www.moog.co.uk/injunction.

As explained in previous correspondence, the website also contains documents which are relevant to the injunction and the underlying proceedings. We would encourage you to review these documents.

Right to apply

We remind you that you are entitled to apply to the Court to set aside or vary the Alternative Means Order (as defined in our previous correspondence), pursuant to CPR r.23.10. You may also wish to seek your own independent legal advice in relation to these proceedings and the matters referred to in this letter. Should you wish to object to the relief sought by the Claimants, you should seek independent legal advice as soon as possible.

Hearing Date

The exact date within the three-day window on which the Review Hearing will be heard has not yet been confirmed by the Court. Once confirmed, this information will be available via HM Courts & Tribunals Service's published court listings for the Business and Property Division at https://www.court-tribunal-hearings.service.gov.uk/summary-of-publications?locationId=111

Alternatively, if you provide us with an email address, we will notify you of the specific hearing date as soon as we are informed of it by the Court.

Email correspondence

If you wish to be served by email or if you instruct a solicitor to act for you in these proceedings, please provide the relevant details to us at mooglegal@moog.com and we will arrange for future documents to be served accordingly.

Yours sincerely,

Moog Inc.

Encs.

Moog Inc.
400 Jamison Rd. • East Aurora, NY 14052-0018
Telephone: +1-716 652-2000

MOOG

BY FIRST CLASS POST

Hisham Alkhamesi
[redacted]

3 November 2026

Dear Hisham Alkhamesi,

IN THE HIGH COURT OF JUSTICE, BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES, PROPERTY, TRUSTS AND PROBATE LIST (ChD)

CLAIM NO. PT-2025-000910

(1) MOOG WOLVERHAMPTON LIMITED AND OTHERS v (1) PERSONS UNKNOWN AND OTHERS

We are the Claimants in the above civil proceedings.

We write further to our previous correspondence concerning these proceedings, including our letter of 13 October 2026 enclosing a bundle of documents which comprised, by way of service, the Joinder Application (as defined in that letter) and other documents filed in the proceedings, and subsequent letter of 30 October 2026 which requested your confirmation to agreement that the Joinder Application would be heard at the Review Hearing, as requested by the court on the sealed notice for the Joinder Application. Please note that the Claimants will be asking the court to hear the Joinder Application at the Review Hearing in any event. Should you require further copies of any of this correspondence, please feel free to contact us at the email address below.

We hereby enclose, by way of service, further evidence in support of the review of the Injunction Order (the **"Further Evidence"**). You will be aware that the review hearing for the Injunction Order is listed to take place in a three-day window between 18 November 2026 and 20 November 2026, with a time estimate of half a day.

The further evidence comprises the sixth witness statement of Elwira Kelly dated 3 November 2026 **("Kelly 6"),** together with a bundle of documents comprising Exhibit EK6.

We also enclose a revised version of the Draft Amended Injunction Order including the Named Defendants. This is the proposed order sought in connection with the Claimants' application to join the Named Defendants to these proceedings and review the existing injunction. The order has been revised since it was first provided to you, and we therefore enclose the updated version for completeness. Moog will be asking the court to make an order in these terms at the review hearing.

The Further Evidence has been filed with the court. It has also been uploaded to the following website: www.moog.co.uk/injunction.

As explained in previous correspondence, the website also contains documents which are relevant to the injunction and the underlying proceedings. We would encourage you to review these documents.

Right to apply

We remind you that you are entitled to apply to the Court to set aside or vary the Alternative Means Order (as defined in our previous correspondence), pursuant to CPR r.23.10. You may also wish to seek your own independent legal advice in relation to these proceedings and the matters referred to in this letter. Should you wish to object to the relief sought by the Claimants, you should seek independent legal advice as soon as possible.

Hearing Date

The exact date within the three-day window on which the Review Hearing will be heard has not yet been confirmed by the Court. Once confirmed, this information will be available via HM Courts & Tribunals Service's published court listings for the Business and Property Division at https://www.court-tribunal-hearings.service.gov.uk/summary-of-publications?locationId=111

Alternatively, if you provide us with an email address, we will notify you of the specific hearing date as soon as we are informed of it by the Court.

Email correspondence

If you wish to be served by email or if you instruct a solicitor to act for you in these proceedings, please provide the relevant details to us at mooglegal@moog.com and we will arrange for future documents to be served accordingly.

Yours sincerely,

Moog Inc.

Encs.

Moog Inc.
400 Jamison Rd. • East Aurora, NY 14052-0018
Telephone: +1-716 652-2000

MOOG

BY FIRST CLASS POST

Iain Evans
[redacted]

3 November 2026

Dear Iain Evans,

IN THE HIGH COURT OF JUSTICE, BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES, PROPERTY, TRUSTS AND PROBATE LIST (ChD)

CLAIM NO. PT-2025-000910

(1) MOOG WOLVERHAMPTON LIMITED AND OTHERS v (1) PERSONS UNKNOWN AND OTHERS

We are the Claimants in the above civil proceedings.

We write further to our previous correspondence concerning these proceedings, including our letter of 13 October 2026 enclosing a bundle of documents which comprised, by way of service, the Joinder Application (as defined in that letter) and other documents filed in the proceedings, and subsequent letter of 30 October 2026 which requested your confirmation to agreement that the Joinder Application would be heard at the Review Hearing, as requested by the court on the sealed notice for the Joinder Application. Please note that the Claimants will be asking the court to hear the Joinder Application at the Review Hearing in any event. Should you require further copies of any of this correspondence, please feel free to contact us at the email address below.

We hereby enclose, by way of service, further evidence in support of the review of the Injunction Order (the **"Further Evidence"**). You will be aware that the review hearing for the Injunction Order is listed to take place in a three-day window between 18 November 2026 and 20 November 2026, with a time estimate of half a day.

The further evidence comprises the sixth witness statement of Elwira Kelly dated 3 November 2026 **("Kelly 6"),** together with a bundle of documents comprising Exhibit EK6.

We also enclose a revised version of the Draft Amended Injunction Order including the Named Defendants. This is the proposed order sought in connection with the Claimants' application to join the Named Defendants to these proceedings and review the existing injunction. The order has been revised since it was first provided to you, and we therefore enclose the updated version for completeness. Moog will be asking the court to make an order in these terms at the review hearing.

The Further Evidence has been filed with the court. It has also been uploaded to the following website: www.moog.co.uk/injunction.

As explained in previous correspondence, the website also contains documents which are relevant to the injunction and the underlying proceedings. We would encourage you to review these documents.

Right to apply

We remind you that you are entitled to apply to the Court to set aside or vary the Alternative Means Order (as defined in our previous correspondence), pursuant to CPR r.23.10. You may also wish to seek your own independent legal advice in relation to these proceedings and the matters referred to in this letter. Should you wish to object to the relief sought by the Claimants, you should seek independent legal advice as soon as possible.

Hearing Date

The exact date within the three-day window on which the Review Hearing will be heard has not yet been confirmed by the Court. Once confirmed, this information will be available via HM Courts & Tribunals Service's published court listings for the Business and Property Division at https://www.court-tribunal-hearings.service.gov.uk/summary-of-publications?locationId=111

Alternatively, if you provide us with an email address, we will notify you of the specific hearing date as soon as we are informed of it by the Court.

Email correspondence

If you wish to be served by email or if you instruct a solicitor to act for you in these proceedings, please provide the relevant details to us at mooglegal@moog.com and we will arrange for future documents to be served accordingly.

Yours sincerely,

Moog Inc.

Encs.

Moog Inc.
400 Jamison Rd. • East Aurora, NY 14052-0018
Telephone: +1-716 652-2000

MOOG

BY FIRST CLASS POST

Bea Sherman (also known as Frank Sherman)
[redacted]

11 November 2026

Dear Bea Sherman,

IN THE HIGH COURT OF JUSTICE, BUSINESS AND PROPERTY DIVISION OF ENGLAND AND WALES, PROPERTY, TRUSTS AND PROBATE LIST (ChD)

CLAIM NO. PT-2025-000910

(1) MOOG WOLVERHAMPTON LIMITED AND OTHERS v (1) PERSONS UNKNOWN AND OTHERS

As you are aware, we are the Claimants in the above civil proceedings. As mentioned in previous correspondence, the Review Hearing of the proceedings is listed for a three-day window between 18-20 November 2026 (inclusive) with a time estimate of half a day. We will also be asking the court to hear the Joinder Application during the Review Hearing.

We enclose with this letter the index for the bundle for the Review Hearing (the "Review Hearing Bundle"). For your information, we also enclose the index for the bundle for the original hearing on 6 October 2025 (the "Original Bundle").

Both the Review Hearing Bundle and the Original Bundle will be made available online at https://www.moog.co.uk/injunction.html prior to the Review Hearing. Hard copies of the Review Hearing Bundle and the Original Bundle will also be made available at the Review Hearing. Should you wish hard copies of the Review Hearing Bundle and/or Original Bundle to be sent to you in advance of the Review Hearing, please contact us at mooglegal@moog.com, specifying the address to which you would like these sent as soon as possible so that we can make the necessary arrangements.

Yours sincerely,

Moog Inc.

Enc.

IN THE HIGH COURT OF JUSTICE **Claim No. PT-2025-000910**

BUSINESS AND PROPERTY DIVISON

PROPERTY TRUSTS AND PROBATE LIST

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

VOLUME 1
REVIEW HEARING BUNDLE

Pagination of this bundle is in red. All other pagination is internal to that document.

Volume 2 (Hearing Bundle for the Return Hearing on 6 October 2025) can also be found here: https://www.moog.co.uk/injunction.html

Doc no.	Document	Date	Page no.
TAB A – October 2025 Injunction Order			
1	Claim Form	4 September 2025	
2	Amended Particulars of Claim	5 September 2025	
3	Order of Meade J	8 September 2025	
4	Order of the Honourable Mr Justice Thompsell	6 October 2025	
5	Claimants' Note of the Hearing	6 October 2025	
6	Amended Claim Form	22 October 2025	
7	Re-Amended Particulars of Claim	7 October 2025	
TAB B – Application Documents for the Review Hearing			

8	Application Notice for Listing of Review Hearing ("Review Application")	28 July 2026	
9	Notice of Review Hearing	12 August 2026	
TAB C – Application Documents for Service by Alternative Means			
10	Application Notice for Service by Alternative Means on the Named Defendants	28 July 2026	
11	Order of Master McQuail (*service by alternative means*) ("Alternative Means Order")	3 September 2026	
TAB D – Application Documents for Joinder			
12	Application Notice for Joinder of Named Defendants and Amendments to Pleadings ("Joinder Application")	2 October 2026	
13	Draft Amended Injunction Order (adding Named Defendants)	N/A	
14	Re-Amended Claim Form *(which the Claimants seek permission to amend per the Joinder Application)*	2 October 2026	
15	Re-Re-Amended Particulars of Claim *(which the Claimants seek permission to amend per the Joinder Application)*	2 October 2026	
TAB E – Witness Statements			
16	First Witness Statement of Elwira Kelly on behalf of the Claimant (Exhibit EK1 can be found at https://www.moog.co.uk/injunction.html)	4 September 2025	
17	Second Witness Statement of Elwira Kelly on behalf of the Claimant (Exhibit EK2 can be found at https://www.moog.co.uk/injunction.html)	5 September 2025	
18	Third Witness Statement of Elwira Kelly on behalf of the Claimant (Exhibit EK3 can be found at https://www.moog.co.uk/injunction.html)	1 October 2025	
19	Fourth Witness Statement of Elwira Kelly on behalf of the Claimant (enclosing Exhibit EK4)	28 July 2026	

20	Fifth Witness Statement of Elwira Kelly on behalf of the Claimant (enclosing Exhibit EK5)	2 October 2026	
21	Sixth Witness Statement of Elwira Kelly on behalf of the Claimant (enclosing Exhibit EK6)	3 November 2026	
TAB F – Correspondence with Named Defendants			
22	Letters to Named Defendants serving Joinder Application (and related documents), Review Application (and related documents), Alternative Means Order (and related documents), and all other documents previously filed in these proceedings	13 October 2026	
23	Letters to Named Defendants on agreement to listing of Joinder Application at Review Hearing	30 October 2026	
24	Letter to Hanah Yun Stevens on service of documents	4 November 2026	
25	Letters to Named Defendants serving Kelly 6, EK6, and the draft amended injunction order	4 November 2026	
26	Letters to Named Defendants regarding Review Hearing bundle	11 November 2026	
TAB G – Certificates of Service			
27	Certificate of Service (Kelly 6, EK6, and the draft amended injunction order)	6 November 2026	

IN THE HIGH COURT OF JUSTICE **Claim No. PT-2025-000910**

CHANCERY DIVISON

PROPERTY TRUSTS AND PROBATE LIST

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 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 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 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

HEARING BUNDLE

Pagination of this bundle is in red. All other pagination is internal to that document.

Doc no.	Document	Date	Page no.
TAB A – Court Documents			
1.	Cover Letter to the Court	4 September 2025	4
2.	Claim Form	4 September 2025	5 - 13
3.	Amended Particulars of Claim	5 September 2025	14 - 30
4.	Order of Meade J	8 September 2025	31 - 56
5.	Application Notice for Return Date	15 September 2025	57 - 63
6.	Draft Order appended to the Application Notice for Return Date dated 15 September 2025	15 September 2025	64 - 88
7.	Application Notice	1 October 2025	89 - 95
TAB B – Witness Statement			
8.	First Witness Statement of Elwira Kelly on behalf of the Claimant (enclosing Exhibit EK1)	4 September 2025	96 - 363
9.	Second Witness Statement of Elwira Kelly on behalf of the Claimant (enclosing Exhibit EK2)	5 September 2025	364 - 389
10.	Third Witness Statement of Elwira Kelly on behalf of the Claimant (enclosing Exhibit EK3)	1 October 2025	390 – 451

TAB C – Supplemental Documents			
11.	Note of Hearing	5 September 2025	452 - 454

Moog Inc.
400 Jamison Rd. • East Aurora, NY 14052-0018
Telephone: +1-716 652-2000

MOOG

BY FIRST CLASS POST

Hana Yun Stevens
[redacted]

11 November 2026

Dear Hana Yun Stevens,

IN THE HIGH COURT OF JUSTICE, BUSINESS AND PROPERTY DIVISION OF ENGLAND AND WALES, PROPERTY, TRUSTS AND PROBATE LIST (ChD)

CLAIM NO. PT-2025-000910

(1) MOOG WOLVERHAMPTON LIMITED AND OTHERS v (1) PERSONS UNKNOWN AND OTHERS

As you are aware, we are the Claimants in the above civil proceedings. As mentioned in previous correspondence, the Review Hearing of the proceedings is listed for a three-day window between 18-20 November 2026 (inclusive) with a time estimate of half a day. We will also be asking the court to hear the Joinder Application during the Review Hearing.

We enclose with this letter the index for the bundle for the Review Hearing (the "Review Hearing Bundle"). For your information, we also enclose the index for the bundle for the original hearing on 6 October 2025 (the "Original Bundle").

Both the Review Hearing Bundle and the Original Bundle will be made available online at https://www.moog.co.uk/injunction.html prior to the Review Hearing. Hard copies of the Review Hearing Bundle and the Original Bundle will also be made available at the Review Hearing. Should you wish hard copies of the Review Hearing Bundle and/or Original Bundle to be sent to you in advance of the Review Hearing, please contact us at mooglegal@moog.com, specifying the address to which you would like these sent as soon as possible so that we can make the necessary arrangements.

Yours sincerely,

Moog Inc.

Enc.

IN THE HIGH COURT OF JUSTICE **Claim No. PT-2025-000910**

BUSINESS AND PROPERTY DIVISON

PROPERTY TRUSTS AND PROBATE LIST

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

VOLUME 1
REVIEW HEARING BUNDLE

Pagination of this bundle is in red. All other pagination is internal to that document.

Volume 2 (Hearing Bundle for the Return Hearing on 6 October 2025) can also be found here: https://www.moog.co.uk/injunction.html

Doc no.	Document	Date	Page no.
TAB A – October 2025 Injunction Order			
1	Claim Form	4 September 2025	
2	Amended Particulars of Claim	5 September 2025	
3	Order of Meade J	8 September 2025	
4	Order of the Honourable Mr Justice Thompsell	6 October 2025	
5	Claimants' Note of the Hearing	6 October 2025	
6	Amended Claim Form	22 October 2025	
7	Re-Amended Particulars of Claim	7 October 2025	
TAB B – Application Documents for the Review Hearing			

8	Application Notice for Listing of Review Hearing ("Review Application")	28 July 2026	
9	Notice of Review Hearing	12 August 2026	
TAB C – Application Documents for Service by Alternative Means			
10	Application Notice for Service by Alternative Means on the Named Defendants	28 July 2026	
11	Order of Master McQuail (*service by alternative means*) ("Alternative Means Order")	3 September 2026	
TAB D – Application Documents for Joinder			
12	Application Notice for Joinder of Named Defendants and Amendments to Pleadings ("Joinder Application")	2 October 2026	
13	Draft Amended Injunction Order (adding Named Defendants)	N/A	
14	Re-Amended Claim Form *(which the Claimants seek permission to amend per the Joinder Application)*	2 October 2026	
15	Re-Re-Amended Particulars of Claim *(which the Claimants seek permission to amend per the Joinder Application)*	2 October 2026	
TAB E – Witness Statements			
16	First Witness Statement of Elwira Kelly on behalf of the Claimant (Exhibit EK1 can be found at https://www.moog.co.uk/injunction.html)	4 September 2025	
17	Second Witness Statement of Elwira Kelly on behalf of the Claimant (Exhibit EK2 can be found at https://www.moog.co.uk/injunction.html)	5 September 2025	
18	Third Witness Statement of Elwira Kelly on behalf of the Claimant (Exhibit EK3 can be found at https://www.moog.co.uk/injunction.html)	1 October 2025	
19	Fourth Witness Statement of Elwira Kelly on behalf of the Claimant (enclosing Exhibit EK4)	28 July 2026	

20	Fifth Witness Statement of Elwira Kelly on behalf of the Claimant (enclosing Exhibit EK5)	2 October 2026	
21	Sixth Witness Statement of Elwira Kelly on behalf of the Claimant (enclosing Exhibit EK6)	3 November 2026	
TAB F – Correspondence with Named Defendants			
22	Letters to Named Defendants serving Joinder Application (and related documents), Review Application (and related documents), Alternative Means Order (and related documents), and all other documents previously filed in these proceedings	13 October 2026	
23	Letters to Named Defendants on agreement to listing of Joinder Application at Review Hearing	30 October 2026	
24	Letter to Hanah Yun Stevens on service of documents	4 November 2026	
25	Letters to Named Defendants serving Kelly 6, EK6, and the draft amended injunction order	4 November 2026	
26	Letters to Named Defendants regarding Review Hearing bundle	11 November 2026	
TAB G – Certificates of Service			
27	Certificate of Service (Kelly 6, EK6, and the draft amended injunction order)	6 November 2026	

IN THE HIGH COURT OF JUSTICE **Claim No. PT-2025-000910**

CHANCERY DIVISON

PROPERTY TRUSTS AND PROBATE LIST

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 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 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 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

HEARING BUNDLE

Pagination of this bundle is in red. All other pagination is internal to that document.

Doc no.	Document	Date	Page no.
TAB A – Court Documents			
1.	Cover Letter to the Court	4 September 2025	4
2.	Claim Form	4 September 2025	5 - 13
3.	Amended Particulars of Claim	5 September 2025	14 - 30
4.	Order of Meade J	8 September 2025	31 - 56
5.	Application Notice for Return Date	15 September 2025	57 - 63
6.	Draft Order appended to the Application Notice for Return Date dated 15 September 2025	15 September 2025	64 - 88
7.	Application Notice	1 October 2025	89 - 95
TAB B – Witness Statement			
8.	First Witness Statement of Elwira Kelly on behalf of the Claimant (enclosing Exhibit EK1)	4 September 2025	96 - 363
9.	Second Witness Statement of Elwira Kelly on behalf of the Claimant (enclosing Exhibit EK2)	5 September 2025	364 - 389
10.	Third Witness Statement of Elwira Kelly on behalf of the Claimant (enclosing Exhibit EK3)	1 October 2025	390 – 451

TAB C – Supplemental Documents			
11.	Note of Hearing	5 September 2025	452 - 454

Moog Inc.
400 Jamison Rd. • East Aurora, NY 14052-0018
Telephone: +1-716 652-2000

MOOG

BY FIRST CLASS POST

Hisham Alkhamesi
[redacted]

11 November 2026

Dear Hisham Alkhamesi,

IN THE HIGH COURT OF JUSTICE, BUSINESS AND PROPERTY DIVISION OF ENGLAND AND WALES, PROPERTY, TRUSTS AND PROBATE LIST (ChD)

CLAIM NO. PT-2025-000910

(1) MOOG WOLVERHAMPTON LIMITED AND OTHERS v (1) PERSONS UNKNOWN AND OTHERS

As you are aware, we are the Claimants in the above civil proceedings. As mentioned in previous correspondence, the Review Hearing of the proceedings is listed for a three-day window between 18-20 November 2026 (inclusive) with a time estimate of half a day. We will also be asking the court to hear the Joinder Application during the Review Hearing.

We enclose with this letter the index for the bundle for the Review Hearing (the "Review Hearing Bundle"). For your information, we also enclose the index for the bundle for the original hearing on 6 October 2025 (the "Original Bundle").

Both the Review Hearing Bundle and the Original Bundle will be made available online at https://www.moog.co.uk/injunction.html prior to the Review Hearing. Hard copies of the Review Hearing Bundle and the Original Bundle will also be made available at the Review Hearing. Should you wish hard copies of the Review Hearing Bundle and/or Original Bundle to be sent to you in advance of the Review Hearing, please contact us at mooglegal@moog.com, specifying the address to which you would like these sent as soon as possible so that we can make the necessary arrangements.

Yours sincerely,

Moog Inc.

Enc.

IN THE HIGH COURT OF JUSTICE **Claim No. PT-2025-000910**

BUSINESS AND PROPERTY DIVISON

PROPERTY TRUSTS AND PROBATE LIST

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

VOLUME 1
REVIEW HEARING BUNDLE

Pagination of this bundle is in red. All other pagination is internal to that document.

Volume 2 (Hearing Bundle for the Return Hearing on 6 October 2025) can also be found here: https://www.moog.co.uk/injunction.html

Doc no.	Document	Date	Page no.
TAB A – October 2025 Injunction Order			
1	Claim Form	4 September 2025	
2	Amended Particulars of Claim	5 September 2025	
3	Order of Meade J	8 September 2025	
4	Order of the Honourable Mr Justice Thompsell	6 October 2025	
5	Claimants' Note of the Hearing	6 October 2025	
6	Amended Claim Form	22 October 2025	
7	Re-Amended Particulars of Claim	7 October 2025	
TAB B – Application Documents for the Review Hearing			

8	Application Notice for Listing of Review Hearing ("Review Application")	28 July 2026	
9	Notice of Review Hearing	12 August 2026	
TAB C – Application Documents for Service by Alternative Means			
10	Application Notice for Service by Alternative Means on the Named Defendants	28 July 2026	
11	Order of Master McQuail (*service by alternative means*) ("Alternative Means Order")	3 September 2026	
TAB D – Application Documents for Joinder			
12	Application Notice for Joinder of Named Defendants and Amendments to Pleadings ("Joinder Application")	2 October 2026	
13	Draft Amended Injunction Order (adding Named Defendants)	N/A	
14	Re-Amended Claim Form *(which the Claimants seek permission to amend per the Joinder Application)*	2 October 2026	
15	Re-Re-Amended Particulars of Claim *(which the Claimants seek permission to amend per the Joinder Application)*	2 October 2026	
TAB E – Witness Statements			
16	First Witness Statement of Elwira Kelly on behalf of the Claimant (Exhibit EK1 can be found at https://www.moog.co.uk/injunction.html)	4 September 2025	
17	Second Witness Statement of Elwira Kelly on behalf of the Claimant (Exhibit EK2 can be found at https://www.moog.co.uk/injunction.html)	5 September 2025	
18	Third Witness Statement of Elwira Kelly on behalf of the Claimant (Exhibit EK3 can be found at https://www.moog.co.uk/injunction.html)	1 October 2025	
19	Fourth Witness Statement of Elwira Kelly on behalf of the Claimant (enclosing Exhibit EK4)	28 July 2026	

20	Fifth Witness Statement of Elwira Kelly on behalf of the Claimant (enclosing Exhibit EK5)	2 October 2026	
21	Sixth Witness Statement of Elwira Kelly on behalf of the Claimant (enclosing Exhibit EK6)	3 November 2026	
TAB F – Correspondence with Named Defendants			
22	Letters to Named Defendants serving Joinder Application (and related documents), Review Application (and related documents), Alternative Means Order (and related documents), and all other documents previously filed in these proceedings	13 October 2026	
23	Letters to Named Defendants on agreement to listing of Joinder Application at Review Hearing	30 October 2026	
24	Letter to Hanah Yun Stevens on service of documents	4 November 2026	
25	Letters to Named Defendants serving Kelly 6, EK6, and the draft amended injunction order	4 November 2026	
26	Letters to Named Defendants regarding Review Hearing bundle	11 November 2026	
TAB G – Certificates of Service			
27	Certificate of Service (Kelly 6, EK6, and the draft amended injunction order)	6 November 2026	

IN THE HIGH COURT OF JUSTICE **Claim No. PT-2025-000910**

CHANCERY DIVISON

PROPERTY TRUSTS AND PROBATE LIST

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 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 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 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

HEARING BUNDLE

Pagination of this bundle is in red. All other pagination is internal to that document.

Doc no.	Document	Date	Page no.
TAB A – Court Documents			
1.	Cover Letter to the Court	4 September 2025	4
2.	Claim Form	4 September 2025	5 - 13
3.	Amended Particulars of Claim	5 September 2025	14 - 30
4.	Order of Meade J	8 September 2025	31 - 56
5.	Application Notice for Return Date	15 September 2025	57 - 63
6.	Draft Order appended to the Application Notice for Return Date dated 15 September 2025	15 September 2025	64 - 88
7.	Application Notice	1 October 2025	89 - 95
TAB B – Witness Statement			
8.	First Witness Statement of Elwira Kelly on behalf of the Claimant (enclosing Exhibit EK1)	4 September 2025	96 - 363
9.	Second Witness Statement of Elwira Kelly on behalf of the Claimant (enclosing Exhibit EK2)	5 September 2025	364 - 389
10.	Third Witness Statement of Elwira Kelly on behalf of the Claimant (enclosing Exhibit EK3)	1 October 2025	390 – 451

TAB C – Supplemental Documents			
11.	Note of Hearing	5 September 2025	452 - 454

Moog Inc.
400 Jamison Rd. • East Aurora, NY 14052-0018
Telephone: +1-716 652-2000

MOOG

BY FIRST CLASS POST

Iain Evans
[redacted]

11 November 2026

Dear Iain Evans,

IN THE HIGH COURT OF JUSTICE, BUSINESS AND PROPERTY DIVISION OF ENGLAND AND WALES, PROPERTY, TRUSTS AND PROBATE LIST (ChD)

CLAIM NO. PT-2025-000910

(1) MOOG WOLVERHAMPTON LIMITED AND OTHERS v (1) PERSONS UNKNOWN AND OTHERS

As you are aware, we are the Claimants in the above civil proceedings. As mentioned in previous correspondence, the Review Hearing of the proceedings is listed for a three-day window between 18-20 November 2026 (inclusive) with a time estimate of half a day. We will also be asking the court to hear the Joinder Application during the Review Hearing.

We enclose with this letter the index for the bundle for the Review Hearing (the "Review Hearing Bundle"). For your information, we also enclose the index for the bundle for the original hearing on 6 October 2025 (the "Original Bundle").

Both the Review Hearing Bundle and the Original Bundle will be made available online at https://www.moog.co.uk/injunction.html prior to the Review Hearing. Hard copies of the Review Hearing Bundle and the Original Bundle will also be made available at the Review Hearing. Should you wish hard copies of the Review Hearing Bundle and/or Original Bundle to be sent to you in advance of the Review Hearing, please contact us at mooglegal@moog.com, specifying the address to which you would like these sent as soon as possible so that we can make the necessary arrangements.

Yours sincerely,

Moog Inc.

Enc.

IN THE HIGH COURT OF JUSTICE **Claim No. PT-2025-000910**

BUSINESS AND PROPERTY DIVISON

PROPERTY TRUSTS AND PROBATE LIST

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

VOLUME 1
REVIEW HEARING BUNDLE

Pagination of this bundle is in red. All other pagination is internal to that document.

Volume 2 (Hearing Bundle for the Return Hearing on 6 October 2025) can also be found here: https://www.moog.co.uk/injunction.html

Doc no.	Document	Date	Page no.
TAB A – October 2025 Injunction Order			
1	Claim Form	4 September 2025	
2	Amended Particulars of Claim	5 September 2025	
3	Order of Meade J	8 September 2025	
4	Order of the Honourable Mr Justice Thompsell	6 October 2025	
5	Claimants' Note of the Hearing	6 October 2025	
6	Amended Claim Form	22 October 2025	
7	Re-Amended Particulars of Claim	7 October 2025	
TAB B – Application Documents for the Review Hearing			

8	Application Notice for Listing of Review Hearing ("Review Application")	28 July 2026	
9	Notice of Review Hearing	12 August 2026	
TAB C – Application Documents for Service by Alternative Means			
10	Application Notice for Service by Alternative Means on the Named Defendants	28 July 2026	
11	Order of Master McQuail (*service by alternative means*) ("Alternative Means Order")	3 September 2026	
TAB D – Application Documents for Joinder			
12	Application Notice for Joinder of Named Defendants and Amendments to Pleadings ("Joinder Application")	2 October 2026	
13	Draft Amended Injunction Order (adding Named Defendants)	N/A	
14	Re-Amended Claim Form *(which the Claimants seek permission to amend per the Joinder Application)*	2 October 2026	
15	Re-Re-Amended Particulars of Claim *(which the Claimants seek permission to amend per the Joinder Application)*	2 October 2026	
TAB E – Witness Statements			
16	First Witness Statement of Elwira Kelly on behalf of the Claimant (Exhibit EK1 can be found at https://www.moog.co.uk/injunction.html)	4 September 2025	
17	Second Witness Statement of Elwira Kelly on behalf of the Claimant (Exhibit EK2 can be found at https://www.moog.co.uk/injunction.html)	5 September 2025	
18	Third Witness Statement of Elwira Kelly on behalf of the Claimant (Exhibit EK3 can be found at https://www.moog.co.uk/injunction.html)	1 October 2025	
19	Fourth Witness Statement of Elwira Kelly on behalf of the Claimant (enclosing Exhibit EK4)	28 July 2026	

20	Fifth Witness Statement of Elwira Kelly on behalf of the Claimant (enclosing Exhibit EK5)	2 October 2026	
21	Sixth Witness Statement of Elwira Kelly on behalf of the Claimant (enclosing Exhibit EK6)	3 November 2026	
TAB F – Correspondence with Named Defendants			
22	Letters to Named Defendants serving Joinder Application (and related documents), Review Application (and related documents), Alternative Means Order (and related documents), and all other documents previously filed in these proceedings	13 October 2026	
23	Letters to Named Defendants on agreement to listing of Joinder Application at Review Hearing	30 October 2026	
24	Letter to Hanah Yun Stevens on service of documents	4 November 2026	
25	Letters to Named Defendants serving Kelly 6, EK6, and the draft amended injunction order	4 November 2026	
26	Letters to Named Defendants regarding Review Hearing bundle	11 November 2026	
TAB G – Certificates of Service			
27	Certificate of Service (Kelly 6, EK6, and the draft amended injunction order)	6 November 2026	

IN THE HIGH COURT OF JUSTICE **Claim No. PT-2025-000910**

CHANCERY DIVISON

PROPERTY TRUSTS AND PROBATE LIST

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 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 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 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

HEARING BUNDLE

Pagination of this bundle is in red. All other pagination is internal to that document.

Doc no.	Document	Date	Page no.
TAB A – Court Documents			
1.	Cover Letter to the Court	4 September 2025	4
2.	Claim Form	4 September 2025	5 - 13
3.	Amended Particulars of Claim	5 September 2025	14 - 30
4.	Order of Meade J	8 September 2025	31 - 56
5.	Application Notice for Return Date	15 September 2025	57 - 63
6.	Draft Order appended to the Application Notice for Return Date dated 15 September 2025	15 September 2025	64 - 88
7.	Application Notice	1 October 2025	89 - 95
TAB B – Witness Statement			
8.	First Witness Statement of Elwira Kelly on behalf of the Claimant (enclosing Exhibit EK1)	4 September 2025	96 - 363
9.	Second Witness Statement of Elwira Kelly on behalf of the Claimant (enclosing Exhibit EK2)	5 September 2025	364 - 389
10.	Third Witness Statement of Elwira Kelly on behalf of the Claimant (enclosing Exhibit EK3)	1 October 2025	390 – 451

TAB C – Supplemental Documents			
11.	Note of Hearing	5 September 2025	452 - 454

Docusign Envelope ID: E5569F0C-9A80-8B50-803A-F743DA75F2A4

HM Courts & Tribunals Service

Name of court

High Court of Justice, Business and Property Division

Claim number

PT-2025-000910

N215

Certificate of service

Name of claimant

MOOG WOLVERHAMPTON LIMITED; MOOG FERNAU LIMITED; MOOG READING LIMITED; MOOG CONTROLS LIMITED

Name of defendant

See Schedule 1

1. On what day did you serve?

Day		Month		Year			
0	4	1	1	2	0	2	6

2. The date of service is

Day		Month		Year			
0	6	1	1	2	0	2	6

Note 2: See page 5 for calculating the deemed date of service.

3. What documents did you serve?

Sixth Witness Statement of Elwira Kelly and Exhibit EK6; Updated draft amended injunction order

Note 3: Attach copies of the documents you have not already filed with the court.

4. On whom did you serve?

Sixth Defendant; Seventh Defendant; Eighth Defendant; Ninth Defendant

Note 4: If appropriate include their position, such as partner or director.

©Crown copyright 2026

Docusign Envelope ID: E5569F0C-9A80-8B50-803A-F743DA75F2A4

5. How did you serve the documents? (tick the appropriate box)

☑ by first class post or other service which provides for delivery on the next business day

☐ by delivering to or leaving at a permitted place

☐ by personally handing it to or leaving it with

Name of person

Time left, where document is other than a claim form

☑ by other means permitted by the court (please specify)

Please see Schedule 2

☐ by Document Exchange

☐ by fax machine

Fax machine: you may want to enclose a copy of the transmission sheet.

Time sent, where document is other than a claim form

☐ by other electronic means (please specify)

Time sent, where document is other than a claim form

6. Give the address where service effected, include fax or DX number, e-mail address or other electronic identification.

First line of address

Please see Schedule 3

Second line of address

Town or city

County (optional)

Postcode

Docusign Envelope ID: E5569F0C-9A80-8B50-803A-F743DA75F2A4

DX number

Fax number

Email address

Other electronic identification

Being the

- [ ] claimant's
- [x] defendant's
- [ ] solicitor's
- [ ] litigation friend's

Location

- [ ] usual residence
- [ ] last known residence
- [ ] place of business
- [ ] principal place of business
- [ ] last known place of business
- [ ] last known principal place of business
- [ ] principal office of the partnership
- [ ] principal office of the corporation
- [ ] principal office of the company
- [ ] place of business of the partnership/company/corporation within the jurisdiction with a connection to claim
- [x] other (please specify)

Please see Schedule 2 and Schedule 3

Docusign Envelope ID: E5569F0C-9A80-8B50-803A-F743DA75F2A4

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 this form are true.

Signature

Signed by:
Elwira J. Kelly
92C7E87347624E7...

☑ Claimant

☐ Defendant

☐ Litigation friend
(where the serving party is a child or protected party)

☐ Claimant's legal representative (as defined by CPR 2.3(1))

☐ Defendant's legal representative (as defined by CPR 2.3(1))

Date

Day	Month	Year
06	11	2026

Full name

Elwira Kelly

Name of 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

Docusign Envelope ID: E5569F0C-9A80-8B50-803A-F743DA75F2A4

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules (www.justice.gov.uk) and you should refer to the rules for information.

Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	Deemed day of service
First class post or other service which provides for delivery on the next business day	The second day after it was posted, left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day.
Document exchange	The second day after it was left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day.
Delivering the document to or leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day before 4.30pm, on that day; or in any other case, on the next business day after that day.
Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted.
Other electronic method	If the email or other electronic transmission is sent on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was sent.
Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day.

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

Docusign Envelope ID: E5569F0C-9A80-8B50-803A-F743DA75F2A4

Schedule 1 – Defendants

(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 ("First Defendant")

(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 ("Second Defendant")

(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 ("Third Defendant")

(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 ("Fourth Defendant")

(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 ("Fifth Defendant")

Docusign Envelope ID: E5569F0C-9A80-8B50-803A-F743DA75F2A4

(6) HANAH YUN STEVENS (“Sixth Defendant”)

(7) BEA SHERMAN (ALSO KNOWN AS FRANK SHERMAN) (“Seventh Defendant”)

(8) IAIN EVANS (“Eighth Defendant”)

(9) HISHAM ALKHAMESI (“Ninth Defendant”)

Docusign Envelope ID: E5569F0C-9A80-8B50-803A-F743DA75F2A4

Schedule 2 – Service permitted by the Court

Pursuant to paragraph 1 of the Order of Master McQuail dated 3 September 2026 (the "Alternative Means Order"), the Claimants have permission to serve the Sixth Defendant, Seventh Defendant, Eighth Defendant, and Ninth Defendant (the "Named Defendants") with, inter alia, the Claimant's application to add the Named Defendants to the Claim and to make consequent amendments to the statements of case (the "Joinder Application), and the Claimant's the application to review the order of the Honourable Mr Justice Thompsell dated 6 October 2025 granting injunctive relief against the First to Fifth Defendants (the "Injunction Order") (the "Review Application") and all evidence in support of the Review Application. Service shall be affected by:

(i) 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 (as replicated at Schedule 3 hereto); and

(ii) Uploading a copy of those documents (omitting Schedule 1 of the Alternative Means Order) to the following website: www.moog.co.uk/injunction; and

(iii) Upon making the Review Application, by placing signs at prominent locations of the perimeter of the Moog Sites shown edged red on Plans 1, 4, and 5, and edged yellow on Plans 2 and 3 at Schedule 2 of the Injunction Order which advises that the Joinder Application and the Review Application have been made and provides a weblink and QR code by which the website or webpage mentioned at (ii) above can be accessed (the "Signs").

(iv) Alternatively, where requested by a Named Defendant: the documents to be served may be served by email on that Named Defendant where that Named Defendants has requested that they be served by email, by sending the email to the address provided by that Named Defendant.

(v) Alternatively, by serving any solicitor acting for a Named Defendant who has filed a notice of acting in these proceedings.

Pursuant to paragraph 2 of the Alternative Means Order, effective service of the Review Application and evidence in support of the Review Application will be deemed to have taken place on the date for each of the Named Defendants on which all the relevant steps in paragraph 1 of the Alternative Means Order have been carried out.

As required by paragraph 1(i) of the Alternative Means Order, the documents set out in box 3 of this Certificate of Service have been posted by first-class post to the addresses contained in Schedule 1 of the Alternative Means Order (as replicated at Schedule 3 hereto) on 4 November 2026.

Docusign Envelope ID: E5569F0C-9A80-8B50-803A-F743DA75F2A4

As required by paragraph 1(ii) of the Alternative Means Order, the documents set out in box 3 of this Certificate of Service were uploaded to the website www.moog.co.uk/injunction on 4 November 2026.

As required by paragraph 1(iii) of the Alternative Means Order, the Signs have been erected around the Moog Sites (as detailed further at paragraph 8(d) of the Sixth Witness Statement of Elwira Kelly dated 3 November 2026).

As of the date of this Certificate of Service, the Named Defendants have not emailed the Claimants requesting documents to be served by email, nor have the Claimants been notified of any notice of acting being filed on behalf of the Named Defendants.

Docusign Envelope ID: E5569F0C-9A80-8B50-803A-F743DA75F2A4

Schedule 3 – Addresses where service was effected

(1) Sixth Defendant's address: [redacted]

(2) Seventh Defendant's address: [redacted]

(3) Eighth Defendant's address: [redacted]

(4) Ninth Defendant's address: [redacted]