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

REVIEW HEARING BUNDLE
(SUPPLEMENTAL BUNDLE)

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

Doc no.	Document	Date	Page no.
1	Seventh Witness Statement of Elwira Kelly on behalf of the Claimant (enclosing Exhibit EK7)	12 November 2026	3 – 65
2	Letters to Named Defendants serving Kelly 7 and EK7	16 November 2026	66 – 73

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Elwira Kelly
Claimant
Seventh Statement
12 November 2026
Exhibit "EK7"

IN THE HIGH COURT OF JUSTICE **CLAIM NO. PT-2025-000910**

BUSINESS AND PROPERTY DIVISION

BETWEEN

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Defendants

SEVENTH 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 six 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**"), the fifth dated 2 October 2026 ("**Kelly 5**"), and the Sixth dated 3 November 2026 ("**Kelly 6**"). For the avoidance of doubt, capitalised terms in this statement continue to adopt the definitions in previous witness statements unless otherwise stated.

2. I make this statement to update the court on correspondence received and procedural steps taken since Kelly 6. I understand that paragraph 7 of the Injunction Order allows Moog to file and serve any evidence in support of the Review Application 14 days before the Review Hearing, which has already passed. I therefore make this witness statement not as evidence in support of the Review Hearing (for which I respectfully direct the court to Kelly 5 and Kelly 6), but to update the court on procedural matters ahead of the Review Hearing.

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LEGAL CORRESPONDENCE SINCE KELLY 6

3. I was made aware from colleagues who check the Moog legal inbox (being the email inbox which Moog has stated it can be contacted in relation to these proceedings, such email address also being included on all relevant documents and in correspondence to the Named Defendants) (the "**Moog Inbox**"), that an email was received on the morning of 9 November 2026 attaching a letter dated 26 October 2026, from a firm of solicitors who represent two of the Named Defendants, Mr Iain Evans and Ms Hana Yun Stevens, in the Criminal Proceedings (as defined in Kelly 5). A copy of the letter is exhibited at p.2.

4. As can be seen from that letter, the firm have confirmed that whilst they act for Mr Evans and Ms Stevens in the Criminal Proceedings, they are not in a position to go on record in relation to these proceedings. As such, any identifying details have been redacted from the letter for security purposes.

5. The letter states that Mr Evans and Ms Stevens requested the firm to ask for Moog's confirmation that, on the basis that these two Named Defendants do not seek to oppose the Joinder Application or Review Application, Moog agrees that there will be no application for costs against them in this matter.

6. Moog responded to the letter by first class post and email on 11 November 2026 (p.3). A copy of the response is included at p.4. By its response, Moog has confirmed that it will not seek costs from Mr Evans or Ms Stevens in respect of the Joinder Application or Review Application on the basis that Mr Evans and Ms Stevens do not seek to oppose these applications. Moog also asked the firm to seek instructions as to whether Mr Evans and Ms Stevens will permit the firm to accept service of documents on them in these proceedings, to assist in ensuring that all relevant documentation reaches the two Named Defendants as swiftly as possible, notwithstanding that the firm is not instructed in these proceedings. In aid of this, Moog also enclosed copies of the letters to Mr Evans and Ms Stevens dated the same date (as detailed below at paragraph 11(a)(i)).

7. As noted at paragraph 9 of Kelly 6, Moog has been unable to obtain confirmation of delivery of the documents to the address it holds for Ms Stevens. As referenced at paragraph 8(a)(v) of Kelly 6, Moog sent a further letter to Ms Stevens on 4 November 2026 to draw Ms Stevens' attention to the fact that documents were being held by Royal Mail for her. I understand that the documents have now been returned to Moog's solicitors, as the retention period for them to be collected from Royal Mail has expired. However, it appears clear to me from the firm's letter that Ms Stevens is nonetheless aware of the Review Application and the Joinder Application. As such, in the event that the firm referenced above is not permitted to accept service of documents in these proceedings on behalf of Ms Stevens, Moog will continue to serve any required documents on Ms Stevens to the address it holds for her, unless and until Ms Stevens (or her representative in these proceedings)

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contacts Moog with an alternative address for service pursuant to paragraphs 1(iv) and (v) of the Alternative Means Order.

8. Whilst no response has yet been received to Moog's letters of 11 November 2026 nor the email of the same date, my colleagues will continue to monitor the Moog Inbox and update the court in due course should it receive further correspondence.

NOTIFICATION AND SERVICE

9. I set out below details of the means by which the documents in these proceedings have been:

   (a) served on the Named Defendants pursuant to the Alternative Means Order; and

   (b) notified to the Defendants (being 'Persons Unknown') pursuant to the Injunction Order,

   since Kelly 6 (such documents being Kelly 6 and Exhibit EK6, the updated draft amended Injunction Order, and letters regarding the bundles for the Review Hearing and the bundle indices).

   Service of documents on the Named Defendants

10. Paragraph numbers in sub-headings 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) The bundle prepared for the Review Hearing runs to 734 pages (the "**Review Hearing Bundle**"). The bundle prepared for the return hearing on 6 October 2025 (at which the Injunction Order was granted) runs to 453 pages (the "**Original Bundle**"). Moog is conscious that this is a large (and perhaps overwhelming) volume of documents to serve on the Named Defendants, who are individuals and, as far as Moog is aware, do not have solicitors instructed to act for them in these proceedings, nor receive documents on behalf of them. As such, Moog has instead served letters on the Named Defendants (pp.5-36), enclosing the indices for the Review Hearing Bundle and the Original Bundle, and which note that (i) both bundles will be available online on the Injunction Website; (ii) Moog will ensure that hard copies of the bundles will be made available at the Review Hearing; and (iii) the Named Defendants should contact the designated Moog Inbox should they wish to receive hard copies of the bundles.

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(ii) The letters referred to at paragraph 10(a)(i) above were posted by first-class post on 11 November 2026 to each of the Named Defendants. Pictures of the envelopes can be found at pp.37-39.

(b) Uploading a copy of those documents to the Injunction Website (paragraph 1(ii))

(i) I confirm that the Review Hearing Bundle and Original Bundle are both available on the above website. A screenshot of the website as of 11 November 2026 is included at pp.40-41.

(c) 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) As detailed at paragraph 8(d) of Kelly 6, 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.42-46. 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 the Moog Inbox.

Notification on the Defendants

11. Paragraph 11 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 documents may be effected by Moog carrying out each of the following steps:

(a) Uploading a copy of the documents on to the Injunction Website, pursuant to paragraph 10(i) of the Injunction Order. As I explain above at paragraph 10(b)(i), copies of the Review Hearing Bundle and Original Bundle have been uploaded to the Injunction Website; and

(b) 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 where the documents can be accessed in hard copy and online. As I explain above at paragraphs 10(c)(i) and (ii), the Signs have been erected at the Prominent Locations at each of the Sites explaining how to access the documents online and how to otherwise obtain copies.

CERTIFICATE OF SERVICE

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12. Moog filed a certificate of service with the court on 6 November 2026 (pp.47-56), confirming that Kelly 6, Exhibit EK6, and the updated draft amended Injunction Order had been served on the Named Defendants (the "**Certificate of Service**"). The date calculated as the deemed date of service was stated as being 6 November 2026 in the Certificate of Service, however I understand that this should have in fact been 4 November 2026, as I explain below.

13. As noted at Schedule 2 of the Certificate of Service, the Alternative Means Order granted Moog permission to serve the Named Defendants by alternative means. Paragraph 2 of the Alternative Means Order states that effective service of the relevant documents will be deemed to have taken place on the date that all of the relevant steps in paragraph 1 of the Alternative Means Order have been taken (being the steps reproduced above at paragraph 12(a), (b), and (c)). These steps were taken by Moog as follows:

    (a) Per paragraph 1(i) of the Alternative Means Order, the documents referenced at paragraph 12 above were sent by first-class post to each of the Named Defendants on 4 November 2026;

    (b) Per paragraph 1(ii) of the Alternative Means Order, the documents referenced at paragraph 12 above were uploaded to the Injunction Website on 4 November 2026; and

    (c) Per paragraph 1(iii) of the Alternative Means Order, the Signs were already erected and in place at the Sites before 4 November 2026 (as detailed at paragraph 8(d) of Kelly 6 and paragraph 10(c) above).

ADDITIONAL DOCUMENTS PRIOR TO REVIEW HEARING

14. I understand that Moog's solicitors will prepare a supplemental bundle ahead of the Review Hearing which will contain copies of this witness statement and Exhibit EK7. Moog will ensure that this is served on the Named Defendants pursuant to the terms of the Alternative Means Order, and notified to the Defendants (the 'Persons Unknown') pursuant to the terms of the Injunction Order, and shall file a further certificate of service with the court confirming service of these additional documents.

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

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DATED this 12th day of November 2026.

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On behalf of Claimant
E Kelly: 7th
Date: 12 November 2026
Exhibit "EK7"

Claim no: PT-2025-000910

IN THE HIGH COURT OF JUSTICE
BUSINESS AND PROPERTY DIVISION

EXHIBIT EK7

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

Name: Elwira Kelly
Position: Senior Vice President, General Counsel and Corporate Secretary
Date: 12 November 2026

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[redacted]

[redacted]

Moog

mooglegal@moog.com

Our Ref: [redacted]
Date: 26th October 2026

Dear Sirs,

In the High Court of Justice

Claim: PT-2025-000910

(1)Moog Wolverhampton Limited and Others v (1) Persons Unknown and Others

Our Clients; Iain Evans and Hana Yun Stevens

I write with reference to the above and note that you have written to the above clients in relation to this matter.

You are seeking to join Mr Evans and Ms Stevens to this Injunction.

I represent Mr Evans and Ms Stevens in criminal proceedings and am not in a position to go on record in relation to this matter.

I am requested however to ask you to confirm that on the basis that Mr Evans and Ms Stevens do not seek to oppose the application for the extended order or for the joinder that you do agree that there will be no application for costs against them in this matter.

Please contact me with any queries.

Yours sincerely

[redacted]
[redacted]
Contact: [redacted]
Direct Dial: [redacted]
Email: [redacted]
[redacted]

[redacted]

From: [redacted]
Sent: Wednesday, November 11, 2026 4:03 PM
To: [redacted]
Subject: Claim No. PT-2025-000910
Attachments: Moog - Letter to [redacted]

Dear Sirs-

Please see attached correspondence in the above-referenced matter. Thank you.

Moog Inc.

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Moog Inc.
400 Jamison Rd. • East Aurora, NY 14052-0018
Telephone: +1-716 652-2000

BY FIRST CLASS POST AND EMAIL

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

11 November 2026

Dear Sirs,

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. We refer to your letter of 26 October 2026 by which you confirmed that Mr Iain Evans and Ms Hana Yun Stevens have requested that you write to us to confirm that, on the basis that Mr Evans and Ms Stevens do not seek to oppose the Joinder Application or the Review Application, Moog will not seek costs against Mr Evans and Ms Stevens for these applications.

We confirm that, on the above basis, we will not seek costs from Mr Evans or Ms Stevens for the Joinder Application or Review Application.

Whilst we note in your letter that you say that you are not instructed to act for Mr Evans or Ms Stevens in these proceedings, we would be grateful if you could seek instructions as to whether Mr Evans or Ms Stevens will nonetheless permit you to accept service of documents on them in the above proceedings by email to your email above [redacted]. This will assist in ensuring that all relevant documentation reaches Mr Evans and Ms Stevens as swiftly as possible. Please confirm your instructions by return.

In the meantime, we enclose copies of the letters sent out today to Mr Evans and Ms Stevens regarding the bundle for the Review Hearing, for information.

Yours sincerely,

Moog Inc.

Enc.

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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.

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

BUSINESS AND PROPERTY DIVISON

PROPERTY TRUSTS AND PROBATE LIST

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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	

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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

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Defendants

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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.

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Yours sincerely,

Moog Inc.

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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

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- and -

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

CHANCERY DIVISON

PROPERTY TRUSTS AND PROBATE LIST

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Telephone: +1-716 652-2000

MOOG

BY FIRST CLASS POST

Hisham Alkhamesi
[redacted]

11 November 2026

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

BUSINESS AND PROPERTY DIVISON

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(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.

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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

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(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	

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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

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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

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TAB C – Supplemental Documents			
11.	Note of Hearing	5 September 2025	452 - 454

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Account Postage GB [redacted] 1

Delivered by Royal Mail

BY FIRST CLASS POST

Iain Evans
[redacted]

[redacted]

Account Postage GB [redacted] 1

Delivered by Royal Mail

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Account Postage GB [redacted] 1

Delivered by Royal Mail

BY FIRST CLASS POST

Hana Yun Stevens

[redacted]

Account Postage GB [redacted] 1

Delivered by Royal Mail

BY FIRST CLASS POST

Hisham Alkhamesi

[redacted]

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Account Postage GB [redacted] 1

Delivered by Royal Mail

BY FIRST CLASS POST

Bea Sherman (also known as Frank Sherman)

[redacted]

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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
- Return Hearing Bundle (6 Oct 2025)
- Note of return hearing (6 October 2025)

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
- 7. Sixth Witness Statement of Elwira Kelly
- 8. Exhibit EK6

Skeleton Arguments:

- 1. Interim Injunction Skeleton (5 Sept 25)
- 2. Final Injunction Skeleton (6 Oct 25)

Review Hearing November 2026:

- Review Hearing Bundle (Nov 2026)

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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.

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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.

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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.

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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.

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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.

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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.

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5. How did you serve the documents? (tick the appropriate box)

- [x] 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

- [x] 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: E51B41D4-A394-8753-83D2-07691188803C

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

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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

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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.

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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")

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(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: E51B41D4-A394-8753-83D2-07691188803C

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.

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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: E51B41D4-A394-8753-83D2-07691188803C

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]

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]

16 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.

We write further to our previous correspondence including our letters of 13 October 2026 (enclosing a bundle of documents in these proceedings for service), 30 October 2026 (seeking agreement to the listing of the Joinder Application at the Review Hearing), 4 November 2026 (serving Kelly 6, Exhibit EK6 and the updated amended draft injunction order), and 11 November 2026 (enclosing indices of the bundles for the Review Hearing).

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 be asking the court to hear the Joinder Application during the Review Hearing.

We hereby enclose, by way of service, further documents filed in these proceedings ahead of the Review Hearing. These comprise a bundle of documents containing the seventh witness statement of Elwira Kelly dated 12 November 2026 ("**Kelly 7**"), together with Exhibit EK7.

We will also be filing a supplemental bundle ahead of the Review Hearing which will consist of Kelly 7, Exhibit 7, and this letter (the "**Supplemental Bundle**"). The Supplemental Bundle, Kelly 7 and Exhibit 7 will be made available online at https://www.moog.co.uk/injunction.html prior to the Review Hearing, alongside all other documents filed in these proceedings.

Hard copies of the Supplemental Bundle will be made available at the Review Hearing. If you would like a hard copy of the Supplemental 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.

The Claimants' Skeleton Argument for the Review Hearing will also be made available at the above website in due course.

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.

Enc.

Moog Inc.
400 Jamison Rd. • East Aurora, NY 14052-0018
Telephone: +1-716 652-2000

MOOG

BY FIRST CLASS POST

Hana Yun Stevens
[redacted]

16 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

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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

Iain Evans
[redacted]

16 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

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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

Hisham Alkhamesi
[redacted]

16 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

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Yours sincerely,

Moog Inc.

Enc.