

Filed on behalf of the Claimants  
Witness: Z Driver  
Statement No. 1  
Exhibit Number: ZD1  
Statement dated: 29 May 2025

**IN THE HIGH COURT OF JUSTICE**

**Claim No.** \_\_\_\_\_

**KING'S BENCH DIVISION**

**B E T W E E N:**

- (1) THE OFFICE GROUP PROPERTIES LIMITED  
(2) FORA OPERATIONS LIMITED

**Claimants**

- and -

**PERSONS UNKNOWN WHO WITHOUT THE CONSENT OF THE CLAIMANTS  
ENTER OR REMAIN ON THE PREMISES KNOWN AS TINTAGEL HOUSE, 92  
ALBERT EMBANKMENT, LONDON SE1 7TY**

**Defendant**

\_\_\_\_\_  
**FIRST WITNESS STATEMENT OF ZARAH DRIVER**

I, **Zarah Driver**, care of **The Office Group, 2 Stephen Street, London, England, W1T 1AN** WILL STATE as follows:

1. I am Head of Legal for The Office Group, a group of companies incorporating The Office Group Properties Limited ("**TOGPL**") and Fora Operations Limited ("**Fora**"), the Claimants in these proceedings. I make this statement in support of:
  - (a) the Claimants' claim for possession of the commercial premises known as Tintagel House, 92 Albert Embankment, London SE1 7TY (the "**Premises**");
  - (b) the Claimants' claim for injunctive relief application for interim injunctive relief to restrain acts of trespass; and

- (c) to instruct the Claimants' solicitors, Mishcon de Reya LLP ("**Mishcon**"), in relation to this litigation and other legal matters. I am duly authorised by the Claimants to make this statement.
- 2. Without waiving privilege, I am informed by Mishcon that, in accordance with paragraph 18.1(5) of Practice Direction 32 of the Civil Procedure Rules, I am required to explain the process by which this statement has been prepared. As such, I confirm that this statement has been prepared following telephone calls, video calls and email exchanges with Mishcon.
- 3. The facts and matters set out in this statement are within my own knowledge and they are true to the best of my knowledge and belief.
- 4. I refer to a paginated bundle of documents marked "**Exhibit ZD1**". It contains copies of the documents to which I refer in this statement. Unless the context makes clear, or I state otherwise, references to page numbers in this statement are to **Exhibit ZD1**.

### **INTRODUCTION**

- 5. In this witness statement I shall address:
  - (a) the relief sought;
  - (b) the Claimants, Premises and Equality and Human Rights Commission (the "**EHRC**");
  - (c) the relevant protest group and protest;
  - (d) the defendants to this Claim and Application;
  - (e) apprehension of future protests; and
  - (f) other remedies/attempts at self-help;
  - (g) service;
  - (h) undertaking in damages;
  - (i) urgency and High Court Business;

### **RELIEF SOUGHT**

- 6. The Claim and Application relates to the Premises.
- 7. The Claimants seek:
  - (a) an order for possession, to eject protestors who are currently occupying the area at the front of the Premises without the permission of the Claimants; and
  - (b) injunctive relief, to prevent further apprehended acts of trespass.
- 8. The above relief is sought as, on 26 May 2025, protestors attended the Premises and proceeded to set up an encampment at the front of the

Premises, which they continue to occupy. The protestors appear to be associated with the group known as 'Trans Kids Deserve Better' ("TKDB"). The protestors are targeting the Premises as the EHRC occupies some of the commercial space at the Premises, and the protestors object to the content of an interim guidance update that the body has recently released (pending a full report) on the interpretation and application of various equality laws, following a recent Supreme Court judgment considering the meaning of 'sex' within the Equality Act 2010.

9. For the avoidance of doubt, those persons occupying the protest encampment do not have the Claimants' permission to be on the Premises, and they are trespassing.
10. I shall explain further below what is known about TKDB, the nature of the protest and the identities of the protestors. I refer to the first witness statement of Jake Thiede dated 29 May 2025 in which he sets out details of his and other colleagues' interactions with members of the encampment, security personnel, police, and the EHRC and other commercial occupiers of the Premises.

## **THE CLAIMANTS AND THE PREMISES**

### **The Claimants**

11. The freehold title to the Premises is held by HRH The Prince William Arthur Philip Louis Prince of Wales Duke of Cornwall Rothesay and Cambridge Earl of Carrick and Strathearn Baron of Renfrew Baron Carrickfergus Lord of the Isles Prince and Great Steward of Scotland. The freehold title is registered at HM Land Registry under title no. 195809. I exhibit at **pages 1 to 5 of ZD1** the official copy of the register of title and accompanying title plan.
12. The Office Group Holdings Limited holds the headlease to the Premises, which leasehold title is registered at HM Land Registry under title no. TGL104527. I exhibit at **pages 6 to 11 of ZD1** the official copy of the register of title and accompanying title plan.
13. By way of a lease dated 10 March 2021, granted for a term of 20 years from and including 10 March 2021, and made between The Office Group Holdings Limited as landlord and TOGPL (the First Claimant) as tenant, a sublease of the Premises was granted to the First Claimant (the "**Sublease**"). I exhibit at **pages 12 to 17 of ZD1** the official copy of the register of title and accompanying title plan.
14. In addition to ZD1, all of the registers of title and accompanying plans can be downloaded from the following website: [www.TintagelHouseInjunction.com](http://www.TintagelHouseInjunction.com).
15. By way of a TR5 dated 5 September 2024, the First Claimant transferred the Sublease to Fora (the Second Claimant). I exhibit at **pages 18 to 25 of ZD1** a copy of the transfer.
16. The Second Claimant has not yet been registered at HM Land Registry as the proprietor of the Sublease; the register of title continues to show the First Claimant as the proprietor of the sublease.

### **Occupancy of the Premises**

17. The Premises is occupied by various occupiers, the vast majority of whom are licensees (the aforementioned TR5 detailing only one tenancy at will, and two substation leases). At present, the Premises has an occupancy rate of 91.7%.
18. By way of a licence agreement dated 16 January 2025, entered into between the Second Claimant and the EHRC for a period of 12 months, the EHRC occupies 629 square feet of office space on the fourth floor of the Premises, with 16 desk spaces. I exhibit at **pages 26 to 36 of ZD1** a copy of the licence agreement.

### The EHRC

19. The EHRC is an independent statutory body responsible for the enforcement of equality laws. The 'who we are' section of the EHRC's website (<https://www.equalityhumanrights.com/about-us/who-we-are>) explains:

*Our role is to make these rights and freedoms a reality for everyone. We use a range of powers to do so, by providing advice and guidance to individuals, employers and other organisations, reviewing the effectiveness of the law and taking legal enforcement action to clarify the law and address significant breaches of rights.*

20. I understand from the EHRC's website, and specifically a press release published on 25 April 2025, that the EHRC is working to update its statutory and non-statutory guidance following the UK Supreme Court's judgment in *For Women Scotland v The Scottish Ministers*. I exhibit a copy of that press release (the "Interim Update") at **pages 37 to 40 of ZD1**, which can also be found here:  
<https://web.archive.org/web/20250425201024/https://www.equalityhumanrights.com/media-centre/interim-update-practical-implications-uk-supreme-court-judgment>.

21. The Interim Update explains the Supreme Court's decision that the term 'sex' within the Equality Act 2010 means biological sex, and summarises the various consequences that arise from the judgment (especially for organisations such as workplaces, services that are open to the public, sporting bodies and other associations).

22. The Interim Update concludes by explaining:

- (a) updated EHRC guidance will be available in "*due course*" and that the body is working "*at pace*" to incorporate the implications of Supreme Court's judgment;
- (b) the EHRC aims to provide the updated code of practice on services, public functions and associations to the UK Government by the end of June for ministerial approval;
- (c) a consultation on the draft code of practice was expected to be launched in mid-May and last for two weeks.

23. That consultation appears to have been launched on the EHRC website on 20 May 2025, and is stated to close on 30 June 2025. I exhibit a copy of the relevant webpage at **pages 41 to 44 of ZD1**, which can also be found here:

<https://www.equalityhumanrights.com/equality/equality-act-2010/codes-practice/code-practice-services-public-functions-and-associations>.

## **THE RELEVANT PROTEST GROUP AND PROTEST**

### **Trans Kids Deserve Better**

24. As mentioned above, the current protest at the Premises appears to be undertaken by those associated with the group known as 'Trans Kids Deserve Better' ("TKDB").

25. The group operates a website (<https://transkidsdeservebetter.org>). I exhibit at **pages 45 to 47 of ZD1** a copy of the homepage. Under the heading 'what are we?', the group describes itself as:

*We are a UK action network by trans+ youth, for trans+ youth. We defend ourselves, and all help is needed*

26. The homepage also carries two email addresses by which the group can be contacted ([hi@transkidsdeservebetter.org](mailto:hi@transkidsdeservebetter.org) and [press@transkidsdeservebetter.org](mailto:press@transkidsdeservebetter.org)), but does not carry a name or nominated person as the point of contact.

27. I exhibit at **pages 48 to 50 of ZD1** a copy of the 'Support' page from the website. Under the heading of 'get involved', the page contains a form by which visitors to the page can sign up to be kept up to date with the group (presumably by some form of email newsletter or similar). The page also contains limited details on how to get involved in the current campaign of decorating small cardboard cut-out coffins, which are being delivered to the Secretary of State for Health and Social Care (Wes Streeting MP).

28. Notably, under the heading of 'our current mischief', the website states:

*Behind the scenes we're constantly coming up with all sorts of fun ideas... Unfortunately we can't tell you about all of them just yet (wouldn't want the transphobes catching on too soon!)*...

29. The 'Support' page also provides a link to an external fundraising page (<https://chuffed.org/project/support-trans-kids-deserve-better>), of which I exhibit a copy at **pages 51 to 55 of ZD1**. The fundraising campaign refers to action being taken outside Mr Streeting MP's constituency office, in which persons associated with the TKDB have established an encampment, but I note that there have been a lot of donations to the page during the course of the current encampment at the Premises at Tintagel House. At the date of this statement, the campaign has raised £15,345.

30. The 'Press' page of the website contains a link to an external Proton Drive (which is like a Sharepoint or One Drive facility) from which it appears that various subfiles can be downloaded, which the group alleges show other instances of direct-action undertaken by its supporters. I have elected not to download those files, as I cannot be sure that the files are in fact safe to download.

31. The 'Press' also contains articles published by the group that details other instances of direct-action undertaken by its supporters, showing that the group is active and has a history of direct-action protest. Those articles include (but are not limited to):
- (a) an article published on 26 May 2025, detailing that the balcony above the entrance to the offices of the EHRC in Glasgow was being occupied by protestors. This action appears to have been co-ordinated with the current action at the Premises. The article explains that the EHRC offices have been a repeated target for protests in the past month (although TKDB does not claim responsibility for these). The article also explains that protestors, and their supporters, were arrested. I exhibit a copy of the article at **pages 59 to 61 of ZD1**;
  - (b) an article published on 26 May 2025, which introduces the current protest at the Premises. That article states that the protestors intended to stay overnight. However, as I have already mentioned, and as is explained in the first witness statement of Jake Thiede, the protestors have stayed for much longer than just 'overnight'. I exhibit a copy of the article at **pages 62 to 64 of ZD1**;
  - (c) an article published on 11 May 2025, detailing that five protestors associated with the group attended 'NHS HQ' at Wellington House (133-135 Waterloo Road), London, "*armed with paintbrushes, spray bottles, and water-activated red face paint*" and left "*bloody handprints*" on the building, with one also writing "*RELEASE THE TRANS YOUTH SUICIDE REPORT*". I exhibit a copy of the article at **pages 65 to 67 of ZD1**;
  - (d) an article published on 20 April 2025, detailing that four protestors conducted a protest outside Mr Streeting MP's constituency office, in which eggs were thrown at the building, covering the glass. I exhibit a copy of the article at **pages 68 to 70 of ZD1**;
  - (e) an article published on 17 April 2025, detailing that two protestors climbed the offices of the Daily Telegraph in London, and displayed a banner reading "*The Daily SMELLEgraph*". I exhibit a copy of the article at **pages 71 to 73 of ZD1**;
  - (f) an article published on 11 December 2024, detailing that protestors were camping outside the constituency office of Mr Streeting MP. I exhibit a copy of the article at **pages 74 to 76 of ZD1**;
  - (g) an article published on 27 November 2024, detailing that sixteen protestors staged a so-called 'die-in' at Victoria train station, London (which appears to entail them laying in the station concourse). I exhibit a copy of the article at **pages 77 to 80 of ZD1**;
  - (h) an article published on 11 October 2024, detailing that six protestors attended the LGB Alliance's annual conference at the Queen

Elizabeth II Conference Hall in Westminster and released 6000 crickets. I exhibit a copy of the article at **pages 81 to 83 of ZD1**;

- (i) an article published on 23 August 2024, detailed that fourteen protestors initiated an occupation of the Department for Education's Westminster offices. It is alleged that hundreds of other turned up to support the protest, but remained outside of the building. I exhibit a copy of the article at **pages 84 to 87 of ZD1**;
  - (j) articles published on 30 June and 1 July 2024 which, taken together, detail that on Saturday 29 June 2024, two protestors climbed the NHS building at Wellington House (133-135 Waterloo Road), London, and were latterly joined by five others. The action appears to have lasted for some three days. I exhibit both articles at **pages 88 to 94 of ZD1**.
32. It is notable that the occupation of buildings and encampments are recurring features of the group's direct-action protests.
33. TKDB is also active on social media, and mostly notably on the Instagram platform. I shall discuss some of the content of that Instagram account later in this statement. However, to summarise, the account generally contains posts, videos and livestreams documenting actions that are taken by the group's supporters (including the current protest at the Premises), as well as advertising and publishing various events run by the group and those with which it is associated.

### **The 2025 May protest at the Premises**

34. I refer to the first witness statement of Jake Thiede which sets out his personal knowledge of the events which have unfolded at the Premises since 26 May 2025.
35. The Instagram account operated by TKDB has heavily documented the course of the current protest. That content includes, but it not limited to:
- (a) a pinned post appears at the top of the page, which was published on 26 May 2025. The caption is long, but includes the statement "[w]e are occupying the outside of Tintagel House (where EHRC offices are located) in order to protest against the harmful interim update on guidance which clearly sets out to honour the Supreme Court ruling surrounding what defines a woman". The caption goes on to state "[w]e intend to stay overnight, sleeping at location. Any support that can be offered, both of time and resources, would be appreciated". Three images accompany the post, two of which show five protestors stood behind the six bollards at the foot of the steps of the terrace, and behind a banner affixed to the bollards which reads "*LISTEN TO US.*". Each of the five protestors is wearing a face covering, some are wearing head coverings, such that they cannot be identified. I exhibit at **page 95 of ZD1** a copy of the Instagram post and three images;
  - (b) a post published on 26 May 2025 (which appears to be either a re-post, or a post as a collaborator), the caption to which reads "*@transkidsdeservebetter are already back at it with the action!!! They are occupying the EHRC offices by Vauxhall in London and will be*

*there for some days!...*". The post is accompanied by 11 photographs. Several of those images show protestors on the Premises, along with a green tent and several market-style bags and other encampment paraphernalia on the terrace area. The images also show that a banner has been affixed across the six bollards at the foot of the steps of the terrace, which reads "*LISTEN TO US.*". I exhibit at **pages 97 to 108 of ZD1** a copy of the Instagram post and 11 images;

- (c) a post published on 27 May 2025, the caption to which reads "*COMMUNITY MEAL TONIGHT!! Come along to the EHRC offices in Vauxhall at 7pm tonight (Tuesday 27<sup>th</sup> May). Bring food, friends and good vibes*". The accompanying picture is of a home-made placard. I exhibit a copy of the Instagram post and image at **page 109 of ZD1**;
  - (d) a post published on 27 May 2025, the caption to which sets out the "*itinerary for the next few days*". That itinerary is stated as being a community meal at 7pm on Tuesday 27 May, a board games café at noon and an open mic night at 7pm on Wednesday 28 May, and an art club at noon on Thursday 29 May. Supporters are again encouraged to "[b]ring supplies, food and friends!!". I exhibit a copy of the Instagram post and accompanying image at **page 111 of ZD1**;
  - (e) a post published on 27 May 2025, the caption to which encourages supporters to attend the aforementioned board game café. The image posted has been taken on the terrace area at the front of the Tintagel House building on the Premises, and shows a fishing chair, bags and other encampment paraphernalia. I exhibit a copy of the Instagram post and accompanying image at **page 112 of ZD1**;
  - (f) a post published on 27 May 2025 (which appears to be either a re-post, or a post as a collaborator), the caption to which reads "*young trans activists from @transkidsdeservebetter occupy the EHRC's London office to protest the flawed interim guidance, pressuring them to listen to the trans voice*". The post is accompanied by seven images, many of which show the encampment in situ on the terrace area. The images show that by now there are several protestors, banners, bags, chairs and other paraphernalia. The protestors are all wearing face coverings, many are wearing hoods. I exhibit at **pages 113 to 120 of ZD1** a copy of the Instagram post and seven images.
36. Several videos have also been posted to the Instagram page, documenting the activity at the encampment. In the interests of proportionality, and the logistical difficulty of putting these before the court, I have not exhibited the videos to this witness statement. However, I note that in each of the videos of the encampment at the Premises, the protestors have used face coverings (and often also hats) to hide their appearance.
37. As I have mentioned above, the current protest at the Premises appears to have been co-ordinated with action taken at the EHRC offices in Glasgow. I am also informed by Jake Thiede that the EHRC have reported to him that their offices in Manchester have also been targeted at the same time. It is clear that the EHRC is a target of interest for the group given the Interim Update, and the awaited final report and updated guidance.



### **DEFENDANTS TO THIS CLAIM AND APPLICATION**

38. The Claimants have made attempts to identify the protestors who are forming the encampment at the Premises. The steps taken in this regard are set out in detail in the first witness statement of Jake Thiede.
39. Despite reasonable efforts, the protestors have refused to provide their names and many of their faces have been concealed by face coverings, as can be seen in the suite of photographs uploaded to Instagram and referred to above. Accordingly, it has not been possible to identify and name any person as a defendant to the Claim and Application at this time.
40. Further, it is not possible for the Claimants to know who may attend the Premises in the future and conduct further acts of trespassory protest. TKDB is also not the only trans-rights action group, and there are several groups (each with their own followers and supporters) gravitating around the cause. If, as it appears, the EHRC is a target a protest by reason of the content of the Interim Update and the anticipated final report, it is likely that other groups will also seek to protest at the Premises in due course. It is impossible for the Claimant to identify the as yet unknown revolving cast of protestors who may attend the Premises.

### **Age of the Trans Kids Deserve Better protestors**

41. I should be clear that it appears that the protestors occupying the encampment at the Premises are fairly young, and are quite possibly under the age of 18. The content that I have viewed on the TKDB website and social media pages suggests to me that the protestors who associate themselves with the group and carry out action under the banner of the group are generally teenagers. I understand from my colleague Jake Thiede that there are associated adults in attendance at the Premises who appear to be monitoring the encamping protestors.
42. Given the likely young age of the protestors, the Claimants have also been especially cautious when seeking to identify those in attendance; the Claimants do not want to inappropriately or mistakenly name someone as a defendant to injunction proceedings, and will only name a defendant of whose identity they are sure. Inappropriately or mistakenly naming a young person to court proceedings could cause distress to that person.

### **APPREHENSION OF FUTURE PROTEST**

43. The Claimants apprehend that, absent injunctive relief further acts of protest, and specifically acts of trespass, will take place at the Premises. That apprehension arises by reason of:
  - (a) TKDB have a demonstrated an interest in protesting against the EHRC, both by way of the current protest at the Premises and the co-ordinated protest at the Manchester and Glasgow offices of the EHRC. The EHRC's licence to occupy commercial space at the Premises is not due to expire until January 2026. Whilst the EHRC remain in

occupation of part of the Premises, it is apprehended that further acts of protest will occur;

- (b) the current protest has been triggered by the Interim Update. The final report is still awaited, and the consultation remains open until 30 June 2025. It is apprehended that (a) further protests will occur between now and the close of the consultation in an attempt to effect change and inform the content of the final report and (b) assuming that the final report will be of a similar nature to the Interim Update (given that both are incorporating the updated case law), further protests will occur following the publication of the final report and updated guidance;
- (c) whilst the current protest is being undertaken by supporters of TKDB, they are many trans-rights activist groups. It is likely that other groups, who gravitate around the same cause as TKDB, will also protest against the EHRC's updated guidance;
- (d) as I have set out above, the TKDB's website, under the heading of 'our current mischief' explains that the group is "*constantly coming up with all sorts of fun ideas*", but that they will not publicise them at this time, to retain the element of surprise.

44. It is also apprehended that further acts of protest will comprise acts of trespass. That apprehension arises by reason of:

- (a) TKDB having an established modus operandi of building occupations, encampments, climbing on buildings and low-level property damage (as demonstrated by the various press-releases detailed above). My awareness of direct-action protest more generally accords with these being common methods of direct-action protest, which are not unique to this group, and are likely to be replicated more widely across other protest groups;
- (b) the topography of the Premises (and specifically the paved area and terrace to the front of the building, which is vulnerable to occupation and encampment).

#### **OTHER REMEDIES / SELF-HELP**

45. The options for the Claimants in dealing with acts of protest, and acts of trespass and encampments specifically, without recourse to the courts, are limited.

46. Ordinarily, the Premises is not staffed with permanent security guards. In response to the current protest, three security guards remain at the Premises 24 hours a day. Extra security staff have been engaged as the Claimants are anxious to prevent and discourage the protestors from entering the building; the Claimants are particularly mindful of the incident in which 6000 crickets were released at the Queen Elizabeth II Conference Hall in October 2024, and do not want a similar incident to occur at the Premises. The Claimants are also mindful of earlier incidents in which supporters of TKDB have engaged in low-level property damage (as set out in the various press-releases above), and

hope that the presence of additional security staff will prevent and discourage such action.

47. That said, the effectiveness of additional security staff is likely to be limited. It would be inappropriate (and quite possibly unlawful) for security staff to physically restrain protestors entering or damaging the building. Similarly, it would be inappropriate (and quite possibly unlawful) for security staff to forcibly remove the protestors from the terrace in front of the building. To this end, the Claimants are again especially mindful of the likely age of the current protestors.
48. Further, the nature of the Premises and the site is such that it cannot be fenced off and enclosed to prevent access. However, access is required for the occupiers of the Premises, and the various lawful guests and visitors to the Premises who visit on a daily basis, such that there is a first line of defence to infiltration of the building by protestors.

### **SERVICE**

49. Attempts to personally serve all documents in the Claim and Application on those present at the encampment at this time will be made. Copies of those documents will also be left at and affixed to the Premises.
50. However, given the urgent need to move the protest encampment on, and secure injunctive relief to ensure that further apprehend acts of trespass do not occur, it will not be possible to give the required notice under the CPR. The relevant applications will be made.
51. As to service of the Claim, Application (and all documents therein) and any injunction order that is secured, notification of the same to newcomer persons unknown is proposed to be by way of:
  - (a) by way of upload to a designated website at the following URL [www.TintagelHouseInjunction.com](http://www.TintagelHouseInjunction.com);
  - (b) by way of email to the following email addresses: [hi@transkidsdeservebetter.org](mailto:hi@transkidsdeservebetter.org) and [press@transkidsdeservebetter.org](mailto:press@transkidsdeservebetter.org)
  - (c) signs affixed to the Premises which read as follows:

### **WARNING INJUNCTION**

THIS AREA IS SUBJECT TO A HIGH COURT INJUNCTION WHICH  
PLACES RESTRICTIONS ON SOME PROTEST ACTIVITIES.

YOU MUST NOT ENTER OR REMAIN ON THIS SITE WITHOUT  
PERMISSION.

BREACH OF THE INJUNCTION COULD LEAD TO IMPRISONMENT.

FOR DETAILS PLEASE SEE: [www.TintagelHouseInjunction.com](http://www.TintagelHouseInjunction.com)

OR FOLLOW THIS QR CODE

[QR CODE]

**UNDERTAKING IN DAMAGES**

52. I have been advised of the requirement for the Claimants provide a cross undertaking in damages in connection with this application and the Claimants are willing to do so. In the event that the undertaking needs to be fortified, the First Claimant relies upon its last filed accounts to demonstrate that it would be able to meet any such damages albeit it is unlikely that the Defendant would suffer any loss given the circumstances of this matter. The Second Claimant is in the same group of companies as the First Claimant.

**URGENCY AND HIGH COURT BUSINESS**

53. Whilst at its core this is a trespass claim, the Claim arises in the context of those who are exercising their Article 10 and 11 rights to protest, giving the Claim a different complexion to the norm. Accordingly, the High Court King's Bench Division, in which such matters are frequently heard, is the appropriate venue for this Claim.
54. Further, in so far as the Claim includes a claim for possession, having regard to the guidance in the King's Bench Guide and PD55A, the High Court remains the appropriate venue for this Claim on the basis that:
- (a) the Claim occurs in the context of the exercising of Article 10 and 11 rights;
  - (b) EHRC staff do not at this time feel able to attend the Premises to conduct their business, given the presence of the protestors; and
  - (c) there being a risk of low-level property damage and/or an escalation of the protest, given the established modus operandi of TKDB and its supporters.

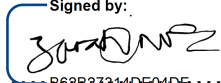
**CONCLUSION**

55. Despite the initial threat that the encampment would stay 'overnight', the encampment has now remained in situ at the Premises since Monday 26 May 2025. Further, even once the encampment has vacated, the Claimants apprehend that, absent injunctive relief, further acts of protest of a similar trespassory nature will occur. The Claimants seek a possession order and injunctive relief accordingly.

**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 by:



SIGNED: 

B62B27314DE04DF...

NAME: Zarah Driver

DATE: 29 May 2025