

Filed on behalf of the Claimants
Witness: Z Driver
Statement No. 2
Exhibit Number: ZD2
Statement dated: 2 June 2025

IN THE HIGH COURT OF JUSTICE

Claim No. KB-2025-001908

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

**SECOND 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 and Fora Operations Limited, the Claimants in these proceedings. I am duly authorised by the Claimants to make this statement.
2. I make this statement in support of the Claimants' claim for injunctive relief and application for interim injunctive relief to restrain acts of trespass on commercial land and buildings known as Tintagel House, 92 Albert Embankment, London SE1 7TY (the "**Premises**").
3. Without waiving privilege, I am informed by Mishcon de Reya LLP ("**Mishcon**") (the Claimants' solicitors) 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 email exchanges with Mishcon.

4. 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.
5. I refer to a paginated bundle of documents marked "**Exhibit ZD2**". 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 ZD2**.

INTRODUCTION

6. I refer to my first witness statement and the first witness statement of my colleague, Jake Thiede, dated 29 May 2025 the accompanying exhibits ZD1 and JT1. Those statements covered various issues including the position on the ground at the Premises up to approximately 2:30pm on 29 May 2025.
7. In this short supplemental witness statement, I shall address the following:
 - (a) events which have taken place since signing my first witness statement;
 - (b) relief sought; and
 - (c) steps taken to serve the proceedings; and
 - (d) omitted pages from Exhibit ZD1.

EVENTS SINCE THE AFTERNOON OF 29 MAY 2025

8. Since signing my first statement on the afternoon of 29 May 2025, the Instagram account operated by Trans Kids Deserve Better ("**TKDB**") has published further content documenting the protest. That content includes:
 - (a) a post published on 29 May 2025 (which appears to be either a re-post, or a post as a collaborator), the caption of which reads "*[s]ome photos I've taken during my Tuesday and Wednesday visit to @transkidsdeservebetter's occupation of the EHRC premises building by Vauxhall. Last night there was an open mic night – which involved poetry and singing. Please show up in solidarity if you can!*" The post is accompanied by 14 photographs. Several of those photographs show the encampment in situ, with the protestors seeking to distribute leaflets. The photographs also show an individual performing (at what appears to be the aforementioned open mic night), but in all other photographs, the protestors or attendees' faces are either covered or have been blurred out. I exhibit a copy of the Instagram post at pages **1 to 14 of ZD2**. Page **14 of ZD2** shows a green tent with a sign reading "*go piss girl*" attached to it. Having considered the content of Mr

Thiede's first witness statement, it seems likely that this is the tent being used as a toilet facility by the protestors.

- (b) a post published on 29 May 2025 (again, which appears to be either a re-post, or post as a collaborator), the caption of which describes the protest and states "*[w]hen trans rights are under attack, what do we do? Stand up, fight back! Not the cops, not the state. We decide our own fate!*" The post is accompanied by a series of photographs and videos. I exhibit at pages **15 to 19 of ZD2** the photographs accompanying the post. Again, many of the protestors are using face coverings. The photos also show that the protest camp has by now accumulated a lot of paraphernalia (bags, sleeping bags and various other belongings are scattered around the front of the Premises".
 - (c) a post published on 29 May 2025 with the caption explaining that TKDB were leaving the Premises on 30 May 2025 and inviting supporters to "*JOIN US FOR OUR ENDING CEREMONY TOMORROW (FRIDAY THE 30TH MAY) AT 12PM TO CELEBRATE THE WORK DONE BY THE BRAVE KIDS INVOLVED IN THIS ACTION.*" I exhibit a copy of the Instagram post and accompanying image at page **20 of ZD2**.
 - (d) A post dated 30 May 2025 (which appears to be either a re-post, or post as a collaborator with the Scottish arm of TKDB), the caption of which reads "*I love it when a plan* comes together. *action*" The post also tags another Instagram account with the username "*@rowlingofficial*". That account has posted 10 photographs of the writer JK Rowling, albeit it does not appear to be an official account. The post is accompanied by two images which appear to be mimicking a post by JK Rowling on a different social media platform. I exhibit at pages **21 to 22 of ZD2** a copy of the post and the accompanying images.
9. There have been several further videos published on the Instagram account operated by TKDB documenting the encampment at the Premises. For reasons of proportionality, and the logistical difficulty of putting these before the court, I have not exhibited the videos to this witness statement.
 10. Neither my colleague Mr Thiede nor I were physically at the Premises on 30 May 2025. However, I was informed by one of my area managers who was present that the protestors left the Premises at approximately 1:15pm on 30 May 2025. The protestors have left several signs and placards affixed to the main entrance of the building but have otherwise left the Premises tidy and free from rubbish. I attach photographs of the condition in which the Premises was left at pages **23 to 25 of ZD2**.

RELIEF SOUGHT

11. As the protestors have now vacated the Premises, the Claimants no longer pursue the claim for a possession order.
12. The Claimants still seek injunctive relief as more particularly set out in the Claim Form and my first witness statement. Given the EHRC's continued occupation of the Premises as a licensee until at least 32 January 2026, it is

apprehended that there will be further and imminent acts of protest at the Premises, especially as the EHRC is currently consulting on its updated guidance.

SERVICE OF THE PROCEEDINGS

13. Attempts to personally serve all documents in the claim and application on those present at the encampment were made on 30 May 2025. Owing to the protestors' stated intention to vacate the Premises at midday (for which, see above), the decision was taken to initially serve unsealed copies of the claim and application (and all documents therein) together with Form N210 Acknowledgement of Service and N208C Notes to Defendant (the "**Response Pack**"). The rationale behind this decision was:
 - (a) to give the protestors as much notice as possible of the claim and application;
 - (b) to ensure that the protestors present had an opportunity to take a hard copy of the proceedings should they accept personal service; and
 - (c) insofar as the protestors were going to avoid personal service, they could be notified of how they could later access the documents in the claim and application should they wish to do so (by virtue of the URL and QR code included in the letters dated 30 May 2025 from Mishcon to the protestors, copies of which are exhibited at pages **26 to 29 of ZD2**, with the enclosures omitted).
14. I refer to the First Witness Statement of Grayson McRae in which he sets out the steps taken to personally serve those protestors present at the Premises. Unfortunately, several of the protestors refused to accept service. Some of the protestors went further and sought to cover up the copy of the QR code which had been affixed to the Premises. I exhibit at page **25 of ZD2** a photograph of a flag that was placed over the QR code by the protestors. That flag was later removed by the protestors before they left the Premises.
15. Shortly after Mr McRae's first attendance at the Premises, Mishcon received the sealed copies of the Claim Form and Application Notice from the Court. Mr McRae was therefore instructed to attempt personal service of the sealed copies of the Claim Form and the Application Notice, along with further copies of the Response Pack.
16. As set out in Mr McRae's statement, the protestors had left the Premises by the time he returned.
17. In addition to the attempts to effect personal service, the Claim and Application (and the documents therein) together with the Response Pack:

- (a) have been uploaded to a designated website at the following URL www.TintagelHouseInjunction.com;
 - (b) have been sent by way of email to the following email addresses: hi@transkidsdeservebetter.org and press@transkidsdeservebetter.org; and
 - (c) copies of the letters dated 30 May 2025 from Mishcon to the protestors were affixed to the Premises, with website and QR code linking to the website visible.
18. Certificates of service will be filed in advance of and available at the hearing.
19. I exhibit at pages **30 to 32 of ZD2** a copy of the website referred to in paragraph 17(a). I exhibit at pages **33 to 34 of ZD2** copies of the emails referred to in paragraph 17(b) (with the attachments omitted).

Exhibit ZD1

20. Lastly, at paragraphs 27 and 28 of my first witness statement, I referred to the 'Support' page of the TKDB website, and exhibited a copy of that webpage at **Exhibit ZD1 (pages 48-50)**. It has since come to my attention that the PDF generated of the webpage did not capture the content under the heading 'our current mischief', which I discussed and quoted at paragraph 28 of my statement. For completeness, I now exhibit a further at pages **35 to 37 of ZD2** a PDF of that page with the omitted content, and apologise for the oversight.
21. A similar issue also occurred with four of the PDF versions of the news articles referred to at paragraph 31 of my first witness statement (the pictures accompanying those articles did not download into the PDF). I exhibit at pages **38-45 of ZD2** PDFs of three of those articles, with the pictures now included. Unfortunately, the picture accompanying the article referred to at paragraph 31(e) will not download into a PDF, and I am unable to produce the same to the court.

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: 2 June 2025
DATE: