Filed on behalf of Claimants Witness: J Thiede Statement No. 1 Exhibit Number: JT1

Statement dated: 29 May 2025

IN	THE	HIGH	COURT	OF.	JUSTICE
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Claim No.

### KING'S BENCH DIVISION

BETWEEN:

(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

	<u>Defendant</u>
FIRST WITNESS STATEMENT OF JAKE THIEDE	

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

- 1. I am Group Head of Operations for The Office Group, a group of companies incorporating the Claimants. I make this statement in support of the Claimants' claim for possession of the premises known as the commercial premises known as Tintagel House, 92 Albert Embankment, London SE1 7TY (the "Premises") and for injunctive relief. I am duly authorised by the Claimants to make this statement.
- 2. Without waiving privilege, I am informed by the Claimants' solicitors, Mishcon de Reya LLP ("**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 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 JT1**". 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 JT1**.

## **INTRODUCTION**

- In this witness statement I shall address:
  - (a) the Premises;
  - (b) the nature and impact of the protest; and
  - (c) the steps I have taken to identify the protestors.

# THE PREMISES

- 6. The Premises is located in on the bank of the River Thames in the Vauxhall area of London, and is a commercial premises, with some 92,769 square feet of office space over 10 floors.
- 7. I exhibit at **pages 1 to 3 of JT1** photographs of the front of the Premises on Albert Embankment. As those images show, the main entrance to the building on the Premises (the "**Building**") is glass fronted, and opens out onto a small raised and covered terraced area, which is covered. From the terrace, a small flight of four or so steps lead to a ground-level paved area, which is predominantly used for-short term parking, such as deliveries, and on which two disabled parking spaces are located (to the right of the Building, on the northern elevation of the site). Six upright metal bollards sit at the foot of the small flight of steps to prevent vehicular access up the steps onto the terraced area and to the front of the Building.
- 8. A short brick wall of no more than 1 metre high marks the boundary of the title to the Premises, and separates the paved area from the public highway and pavement. The wall runs the full length of the eastern boundary of the site, which adjoins the pavement/public highway on Albert Embankment. save for two breaks in the wall. The first break is at the vehicular access point from the highway, where demarcation between the land that is within the title of the Premises and the pavement/public highway is by way of different styles of paving; the pavement is decorative block paving, whereas the paved area within the title of the premises is tarmac. Second, at the very southern tip the site, the wall finishes just short of the title boundary, but demarcation again occurs by way of different paving styles, and two upright metal bollards that prevent vehicular access through the small gap between the wall and the edge of the site.
- 9. To be clear, all land to the front of the Building and up to the boundary wall, and the line that boundary wall would follow across the vehicular access from the highway, is within the demise of the Sublease (as defined in the first witness statement of Zarah Driver).

- The glass fronted entrance off Albert Embankment is the main entrance to the Building used by the occupiers of the Building and any guests and visitors to the Building. There are service entrances to the side and rear of the Building, but these are not generally used by the occupiers to enter and exit the Building, and are not used by guests and visitors to the Building. There are also two other access points to the Building on the front side abutting Albert Embankment. These are via the gymnasium and the café. I exhibit at page 6 of JT1 a floor plan of the Building showing the entrances marked with red arrows.
- 11. Upon entering the Building through the main entrance, one is received into a reception area. That reception area is staffed between the hours of 7am and 6pm, Monday to Friday. Outside of those hours, access can only be gained to the Building by personnel or licensees with key cards and access codes. A person would need to tap their key card and type their access code into the reader at the main entrance in order to gain access to the Building. Access to the higher floors on which the office spaces are located is by way of both staircases and lifts. A key card is required to gain access through all doors in the Building, access staircases and designates office spaces, and operate the lifts.

## **Security of the Premises**

- 12. The Premises are secured by a remote monitoring system, covered by a third-party guarding company, Rock Security. The Premises are monitored 24 hours a day, seven days a week by Opem Security ("**Opem**"). Ordinarily, we do not have a physical security presence on site at the Premises, but through our security contracts we have access to remote rangers who attend the Premises if prompted to do so by the team monitoring the Premises through Closed Circuit Television. The remote rangers would be notified to attend the Premises in the event of an issue, which is what happened on Monday 26 May 2025 when the protestors arrived.
- 13. Given the ongoing protest, we now have three security guards on site 24 hours a day.

## THE RELEVANT PROTEST GROUP AND PROTEST

#### **Trans Kids Deserve Better**

14. The current protest at the Premises appears to be undertaken by those associated with the group known as 'Trans Kids Deserve Better'. I refer to the first witness statement of my colleague Zarah Driver, who has provided details of the group and their prior activities.

# The 2025 May protest at the Premises

- 15. The protestors arrived at the Premises on Monday, 26 May 2025. The Claimants were made aware of the arrival of the protestors at 6pm on 26 May by Opem.
- 16. I was personally notified of the protest at 6:49am on the morning of Tuesday, 27 May 2025, by the Claimants' soft services manager, who manages the

Premises security. I believe that there were originally six protestors on site. This number increased to ten throughout the day.

- 17. I personally arrived at the Premises at approximately 8:40am on 27 May 2025. When I arrived at the Premises, the protestors had attached a banner across five of the six bollards that are located at the bottom of the steps at the main entrance to the Building. I exhibit a photograph from the group's Instagram which shows the location of the banner at **page 4 of JT1**. The banner was covering the steps to the Building and, therefore, the main access and egress point. Behind the steps is the aforementioned covered terrace with the doors to the Building and windows. The group had set up a tent and laid down several sleeping bags in this space. They had several carrier bags of food with them. There were home-made signs taped against the windows, which contained various messages about the Equality and Human Rights Commission (the "EHRC"), the subject of the protest.
- 18. I politely asked the protestors to move their banner elsewhere as, in the event of an emergency, it could cause a health and safety risk as the main entrance to the Building is also a fire exit. The Building at the Premises has capacity for almost 1,000 people. In the event of a fire, it is critical that all emergency exits are clear of obstruction. The protestors refusal to move the banner elsewhere posed a serious risk to the health and safety of the occupiers and visitors of the Building.
- 19. I therefore explained to the protestors that, if they refused to move the banner, I would be telephoning the police. I was told by the protestors that the police had already visited on 26 May 2025, and were comfortable with the location of the banner.
- 20. Given the response I received, I contacted the police, who arrived at the Premises at around 9:20am. Two officers attended and the protestors filmed their attendance. A member of my team and I spoke with the police officers who then spoke to the protestors. The protestors then moved the banner to the right of the bollards located in front of the steps outside the main entrance to the Building.
- 21. On the morning of 28 May 2025, I spoke with the security guards at the Premises who provided me with an update. They explained to me that number of protestors remained at 10 overnight and that the situation had not progressed. I attended the Premises later that afternoon and saw that the number of protestors had increased to 18. I asked the protestors again if they would be willing to move outside of the Premises, but they refused.
- 22. I understand from the security guards that the numbers increased marginally overnight but, as of this morning, there are 12 protestors on site. I have also personally attended the Premises and spoken with the protestors again this morning. As of the time of writing this statement, there were 16 protestors on site. They told me that that the numbers may increase tomorrow. The protestors have spread out across the front of the Building and into the driveway of the Premises.
- 23. As of 2:45pm today, there were approximately 30 protestors present.

### Impact of the May 2025 Protest at the Premises

- 24. Whilst the protest is inconvenient, access to the Premises has not been prevented save that, as mentioned above, the protestors initially placed a banner across the five bollards at the foot of the steps at the front of the Building, which did impede clear access and egress from the fire exit.
- 25. I understand from the Head of Infrastructure and Corporate Security at the EHRC that throughout the duration of the protest at the Premises, the majority of EHRC staff have not been attending the Premises or their other offices across the United Kingdom in Birmingham and Manchester. He told me that staff had been told not to attend the office on Tuesday and are not mandating attendance for the rest of the week. That was a deliberate decision, to avoid EHRC staff being confronted by the protestors and supporters of the 'Trans Kids Deserve Better' group.
- 26. I also joined a board meeting convened by EHRC at short notice to discuss the protests at the Premises and elsewhere. I was asked several questions about security at the Building and we spoke about a joint communications plan should the protests gain traction. I was told by EHRC that they were considering reaching out to the protestors, either via social media or another forum. At the time of writing this statement, I am waiting for an update from the EHRC on efforts to engage with the protestors.
- 27. The operations team at the Premises have received several questions from the other occupiers of the Building as regards the nature of the protest and the steps being taken to ensure the Premises remain secure. I also saw one of the licensees engage in a verbal confrontation with them. To try address any concerns, a communication has been circulated to all of the occupiers of the Premises. A copy of that communication is exhibited at **page 7 of JT1**.
- 28. The protestors are using a green tent as their toilet facility. I exhibit two extracts from Instagram at **page 5 of JT1**. The protestors are also currently blocking one of the Disability Discrimination Act access ramps for the Building.

## **IDENTITY OF THE PROTESTORS**

- 29. On the afternoon of Tuesday 27 May 2025, I asked the protestors for their names, but they refused to provide these.
- 30. As explained in the first witness statement of Zarah Driver, the protestors appear to be under the age of 18. There are a couple of adults present at the protest supervising the protestors, but they appear to be rotating. I have approached the adults, one of whom identified themselves as one of the organisers of the protest. The other adult whom I have had contact with proceeded to film me whenever I approached them.
- 31. About half of the protesters at the Premises are also wearing masks to obscure their identities. I have not taken any photographs of those who are not wearing face coverings, as I am mindful of the apparent age of the protestors and their names are not currently known.

# STATEMENT OF TRUTH

I believe that the facts stated in this witness statement are true. 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.

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