

Application notice

For help in completing this form please read the notes for guidance form N244 Notes.

Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form: <https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>

Name of court The High Court of Justice, King's Bench Division		Claim no. KB-2025-000497										
Fee account no. (if applicable)		Help with Fees – Ref. no. (if applicable)										
PBA 0087138		<table border="1"> <tr> <td>H</td> <td>W</td> <td>F</td> <td>-</td> <td></td> <td></td> <td>-</td> <td></td> <td></td> </tr> </table>		H	W	F	-			-		
H	W	F	-			-						
Warrant no. (if applicable)												
Claimant's name (including ref.) The Chancellor, Masters, and Scholars of the University of Cambridge (CSMAW/00012000-1698)												
Defendant's name (including ref.) PERSONS UNKNOWN (as described in the Claim Form)												
Date		13 March 2025										

1. What is your name or, if you are a legal representative, the name of your firm?

Mills & Reeve LLP

2. Are you a Claimant Defendant Legal Representative
 Other (please specify)

If you are a legal representative whom do you represent?

The claimant

3. What order are you asking the court to make and why?

The Claimant asks the Court for an Order (to the extent necessary pursuant to CPR 17.1(2) and/or CPR 19.4):

- (1) granting permission to the Claimant to amend the Claim Form and the Particulars of Claim to change the description of the Defendants to "Persons Unknown", and making the consequential amendments in the amended statements of case appended hereto; and
- (2) dispensing with the requirements for notification or service of the amended Claim Form and amended Particulars of Claim, pursuant to CPR 6.16.

on the terms in the draft Order appended hereto.

4. Have you attached a draft of the order you are applying for? Yes No
5. How do you want to have this application dealt with? at a hearing without a hearing
 at a remote hearing
6. How long do you think the hearing will last? Is this time estimate agreed by all parties? Hours Minutes
 Yes No
7. Give details of any fixed trial date or period
8. What level of Judge does your hearing need?
9. Who should be served with this application?
- 9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

10. What information will you be relying on, in support of your application?

the attached witness statements

the statement of case

the evidence set out in the box below

If necessary, please continue on a separate sheet.

1. The original Claim Form defined the Defendants by reference to the conduct sought to be prohibited and a description of the category of individuals whom, the University believed, posed the real and imminent risk of carrying out that conduct. This was done as it followed the approach previously recommended in the relevant case law.
2. On 27 February 2025, at the first hearing of the Claimant's application for injunctive relief, dated 12 February 2025, Fordham J preferred to adopt the approach used by Nicklin J in *MBR Acres Ltd v Curtin* [2025] EWHC 331 (19 February 2025) and define the Defendants more broadly – simply as “Persons Unknown”. Both these judgments are expressed to follow the Supreme Court judgment in *Wolverhampton CC v London Gypsies & Travellers* [2024] AC 983.
3. In light of the above, the Claimant makes this application protectively in case the Court: (a) wishes to follow the approach taken by Fordham J and Nicklin J; and, (b) considers it necessary that the description of the Defendants be formally amended to “Persons Unknown”. As such, I believe it is desirable to make this amendment so that the court can resolve the matters in dispute in the proceedings.
4. The Defendants are not, strictly, parties to the proceedings and so the provisions at CPR 17 and 19 may not technically apply. But those provisions have been followed, in substance, for the purposes of making this application.

11. Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

- Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.

No

Statement of Truth

I understand that proceedings for contempt of court may be brought against a person who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

I believe that the facts stated in section 10 (and any continuation sheets) are true.

The applicant believes that the facts stated in section 10 (and any continuation sheets) are true. I am authorised by the applicant to sign this statement.

Signature



Applicant

Litigation friend (where applicant is a child or a Protected Party)

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

Date

Day

13

Month

3

Year

2025

Full name

Samuel Maw

Name of applicant's legal representative's firm

Mills & Reeve LLP

If signing on behalf of firm or company give position or office held

Partner (Solicitor)

Signature and address details

Signed

Dated 13 March 2025

Applicant(~~'s legal representative~~)(~~'s litigation friend~~)

Position or office held _____ Partner (Solicitor) _____
(if signing on behalf of firm or company)

Applicant's address to which documents should be sent.

Building and street

Botanic House

Second line of address

100 Hills Road

Town or city

Cambridge

County (optional)

Cambridgeshire

Postcode

C		B		2				1		P		H
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If applicable

Phone number

-

Fax phone number

-

DX number

5210 Norwich

Your Ref.

CSMAW/00012000-1698

Email

Samuel.Maw@Mills-Reeve.com



Claim Form

You may be able to issue your claim online which may save time and money. Go to www.moneyclaims.service.gov.uk/make-claim to find out more.

In the High Court of Justice, Kings Bench Division

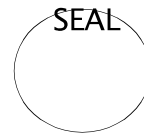
Fee Account no. PBA 0087138

Help with Fees - Ref no. (if applicable) **H W F** - -

	For court use only
Claim no.	<u>KB -2025-000497</u>
Issue date	

Amended Claim Form by Order of _____ dated _____

Claimant(s) name(s) and address(es) including postcode
The Chancellor, Masters and Scholars of the University of Cambridge
The Senate House, Kings Parade, Cambridge



Defendant(s) name and address(es) including postcode

Persons unknown ~~who, in connection with Cambridge for Palestine or otherwise for a purpose connected with the Palestine-Israel conflict, without the claimant's consent (i) enter occupy or remain upon (ii) block, prevent, slow down, obstruct or otherwise interfere with access to (iii) erect any structure (including tents) on, the following sites (as shown for identification edged red on the attached plans 1 and 2):~~

~~(A) Greenwich House, Madingley Rise, Cambridge, CB3 0TX (B) Senate House and Senate House Yard, Trinity Street, Cambridge, CB2 1TA (C) The Old Schools, Trinity Lane, Cambridge, CB2 1TN. *~~

Brief details of claim

The Claimant claims that the Defendants must not, without the consent of the Claimant, enter, occupy or remain upon the Land (as defined in the Particulars of Claim), and / or block, prevent, slow down, obstruct or otherwise interfere with the access of any other individual to the Land, and / or erect or place any structure (including, for example, tents or other sleeping equipment) on the Land.

* The Claim Form does not show a full address, but the claimant will take the following steps:

- (1) Uploading a copy onto the following website: www.cam.ac.uk/notices.
- (2) Sending an email to cambridge4palestine@proton.me, encampmentnegotiations@proton.me and bloodonyourhands@systemli.org.
- (3) Affixing a notice at those locations marked with an "x" on Plan 1 and Plan 2 setting out where these documents can be found and obtained in hard copy.

Value

N/A

Defendant's name and address for service including postcode

As above.

Amount claimed	
Court fee	£626.00
Legal representative's costs	
Total amount	£626.00

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

Claim no.

You must indicate your preferred County Court Hearing Centre for hearings here
(see notes for guidance)

N/A

Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

- Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.

- No

Does, or will, your claim include any issues under the Human Rights Act 1998?

- Yes
 No

Claim no.

Particulars of Claim

attached

to follow

Statement of truth

Note: you are reminded that a copy of this claim form must be served on all other parties.

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 claim form and any attached sheets are true.
- The claimant** believes that the facts stated in this claim form and any attached sheets are true. **I am authorised** by the claimant to sign this statement.

Signature



- Claimant
- Litigation friend (where claimant is a child or protected party)
- Claimant's legal representative (as defined by CPR 2.3(1))

Date

Day Month Year

Full name

Name of claimant's legal representative's firm

If signing on behalf of firm or company give position or office held

Claimant's or claimant's legal representative's address to which documents should be sent.

Building and street

Botanic House

Second line of address

100 Hills Road

Town or city

Cambridge

County (optional)

Cambridgeshire

Postcode

C	B	2		1	P	H
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If applicable

Phone number

DX number

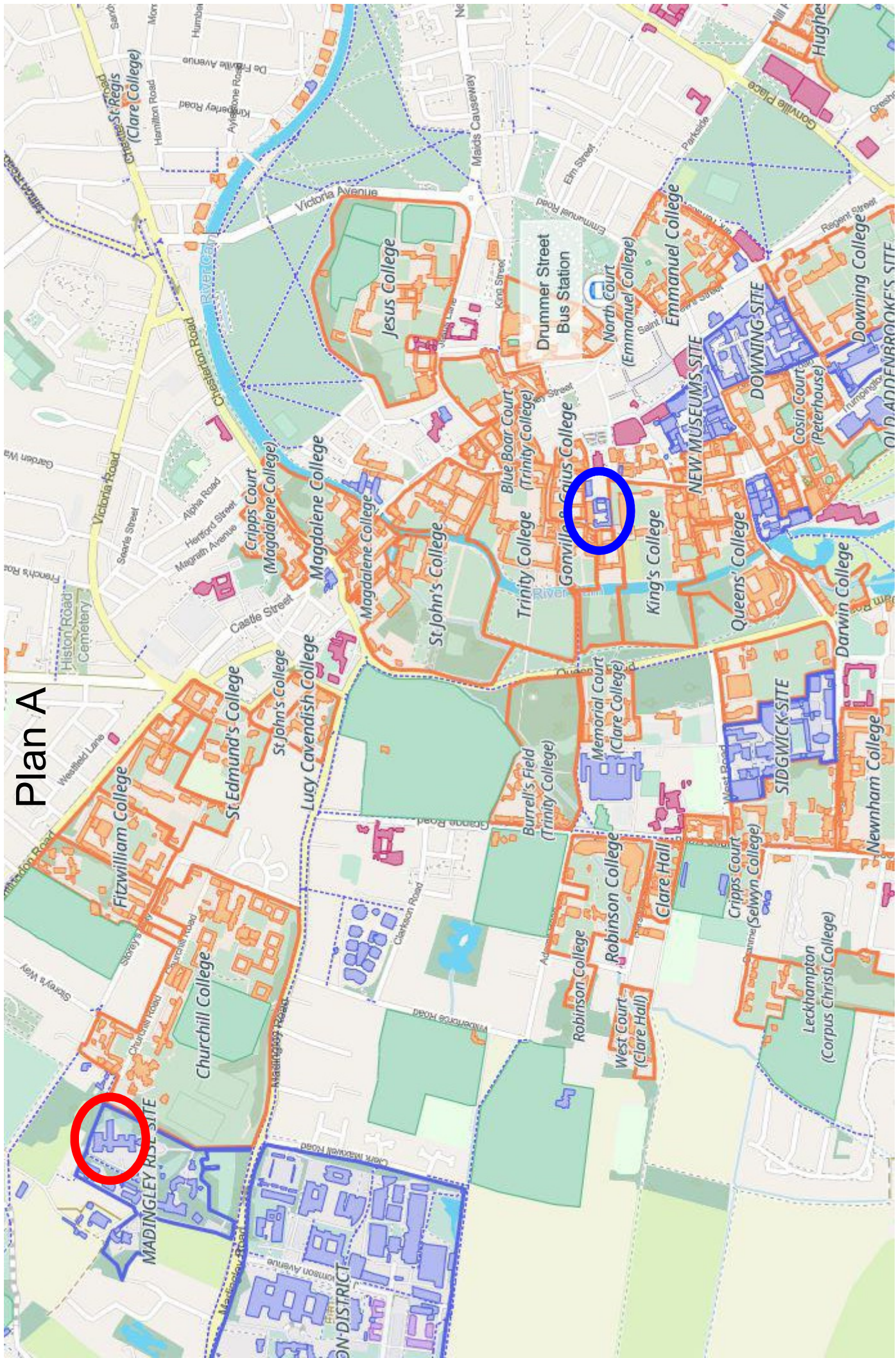
Your Ref.

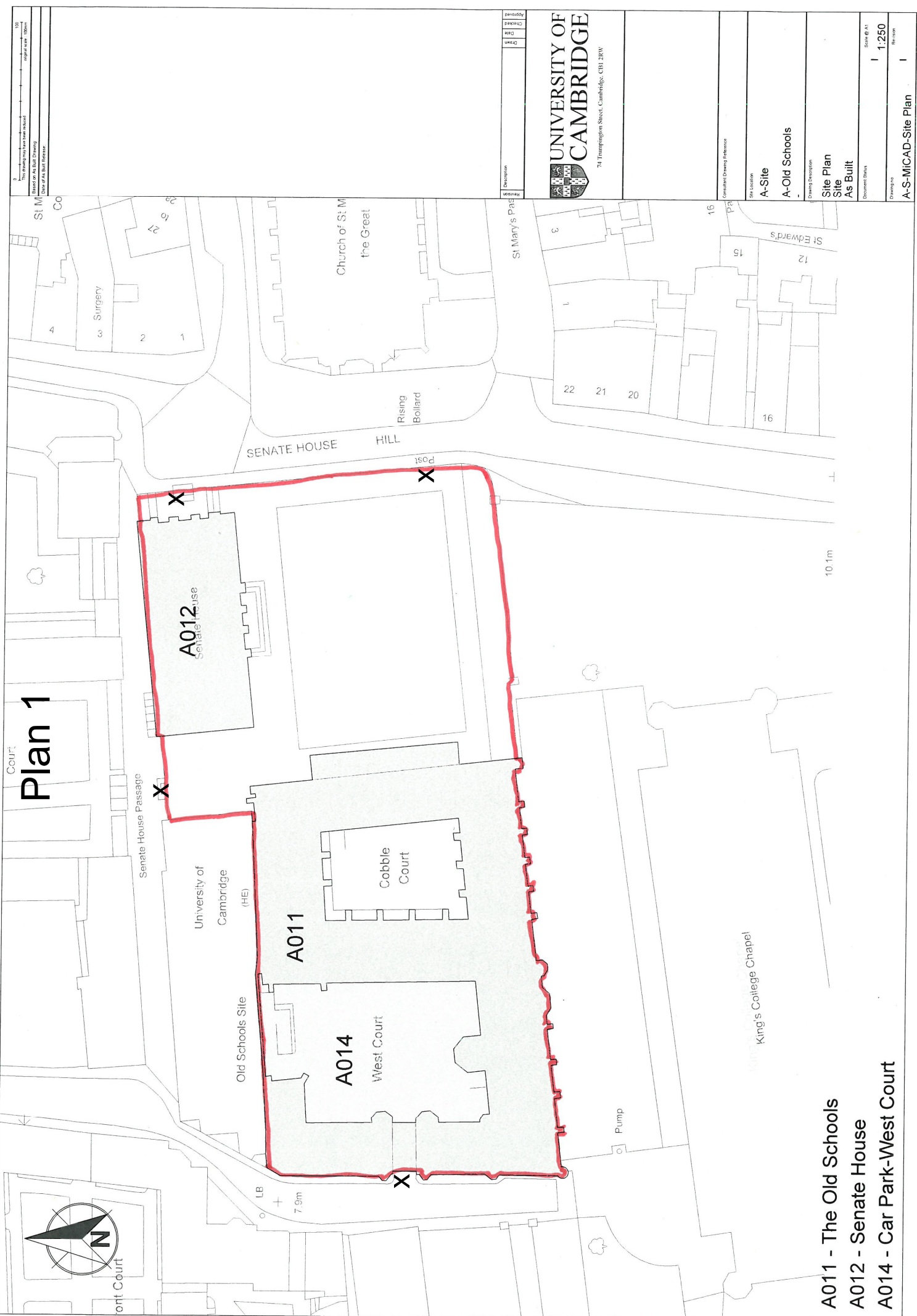
CSMAW/00012000-1698

Email

Samuel.Maw@Mills-Reeve.com

Plan A





Plan 1

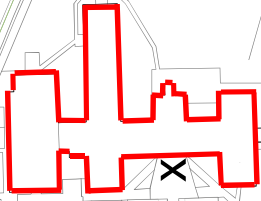
Author	
Checked By	
Drawn	
Scale	

UNIVERSITY OF CAMBRIDGE
 74 Trumpington Street, Cambridge, CB1 2RU

Consultant Drawing Reference	
Site Location	A-Site
University Description	A-Old Schools
Site Plan	Site Plan
As Built	As Built
Document Status	
Scale @ A1	1:250
Revision	1
Drawing	A-S-MiCAD-Site Plan

- A011 - The Old Schools
- A012 - Senate House
- A014 - Car Park-West Court

Plan 2



Date	Revision History
17/08/2015	Description
	A
	P01



Consultant Drawing Reference

Site Location

T-Site
XX-No Applicable Level
T-Maddingley Rise Site

Drawings Description

Site Location Plan
Site
As Built

Document Status and Submittal Description

1

Revision

Revision Description

P03 UNDER CHANGE

Scale @ A1

1:1000

Project/Building

Originator

Volume

Level

Type

Subj.

Number

T-Site-MiCAD-Maddingley Rise-Site Plan

IN THE HIGH COURT OF JUSTICE
KING BENCH DIVISION
BETWEEN:-

CLAIM NO:

CHANCELLOR, MASTERS AND SCHOLARS
OF THE UNIVERSITY OF CAMBRIDGE

Claimant

- v -

~~PERSONS UNKNOWN WHO, IN CONNECTION WITH CAMBRIDGE FOR
PALESTINE OR OTHERWISE FOR A PURPOSE CONNECTED WITH THE
PALESTINE-ISRAEL CONFLICT, WITHOUT THE CLAIMANT'S CONSENT (I)
ENTER OCCUPY OR REMAIN UPON (II) BLOCK, PREVENT, SLOW DOWN,
OBSTRUCT OR OTHERWISE INTERFERE WITH ACCESS TO (III) ERECT ANY
STRUCTURE (INCLUDING TENTS) ON, THE FOLLOWING SITES (AS SHOWN
FOR IDENTIFICATION EDGED RED ON THE ATTACHED PLANS 1 AND 2):
GREENWICH HOUSE, MADINGLEY RISE, CAMBRIDGE, CB3 0TX
SENATE HOUSE AND SENATE HOUSE YARD, TRINITY STREET, CAMBRIDGE, CB2 1TA
THE OLD SCHOOLS, TRINITY LANE, CAMBRIDGE, CB2 1TN~~

Defendants

AMENDED PARTICULARS OF CLAIM
BY ORDER OF _____ DATED _____

I. INTRODUCTION

1. The Claimant (the "University") is a world-renowned university that was founded in 1209. It is frequently recognised as one of the top universities in the world. The University is made up of 31 colleges, which provide students with, amongst other things, pastoral and academic support, including undergraduate supervisions. This claim relates to land owned by the University only.

2. The Defendants are ~~comprised of~~ Persons Unknown. Those who are carrying out the direct action (who will be referred to in this statement of case to as the “Defendants” for convenience), ~~who~~ purport to be students of the University, protesting in relation to the Israel-Palestine conflict and the University’s alleged complicity in the actions of the Israeli Defence Force, such as by its investments in and research arrangements with the defence industry. Many of them appear to be affiliated with the group known as Cambridge for Palestine, whose stated aim (on its website ‘www.cambridge4palestine.org’) is as follows: *“We are a coalition standing against Cambridge University's complicity in the genocide of and apartheid against Palestinians.”* This group, or individuals in some way affiliated with it, have previously carried out direct action at Greenwich House, in November 2024, and in Senate House Yard, in May and November 2024. As well as its website, Cambridge for Palestine also has a Twitter account (“@cam4palestine”), a Facebook account (“Cambridge for Palestine”) an Instagram account (“cambridgeforpalestine”) and a TikTok account (“cambridge4palestine”).
3. On its social media channels, Cambridge for Palestine sets out the following demands under the heading *“CAMBRIDGE ENCAMPMENT FOR PALESTINE: OUR DEMANDS”*:

“We will not move until the University of Cambridge agrees to:
1 Disclose financial and professional ties with complicit organisations
2 Divest funds and collaboration away from such organisations
3 Reinvest in Palestinian students, academics, and scholars
4 Protect students at risk and become a university of sanctuary”

II. LAND TO WHICH CLAIM RELATES

4. The land sought to be covered by the injunction comprises (the “**Land**”):
- 4.1 Greenwich House, Madingley Rise, Cambridge, CB3 0TX. This is an administrative office building accommodating approximately 500 of the University’s employees. It is home to several administrative departments of the

University, including: (i) the Estates Division; (ii) Research Services; (iii) Health, Safety and Regulated Facilities; (iv) Human Resources; and (v) the Finance Division. Physical records of confidential, sensitive and personal information are stored at Greenwich House.

4.2 Senate House and Senate House Yard, Trinity Street, Cambridge, CB2 1TA. This is the ceremonial and administrative heart of the University. It is where degree ceremonies are held and is the official meeting place of the Regent House and of the Senate.

4.3 The Old Schools, Trinity Lane, Cambridge, CB2 1TN. Situated next to Senate House and Senate House Yard and, with them, forming one enclosed site (albeit that the Old Schools is physically distinct), it houses key University administrative departments including the offices of the Senior Leadership Team, such as the Vice-Chancellor, the Pro-Vice-Chancellors, the Chief Financial Officer, the Director of Communications and External Affairs and, the Registry. Also within The Old Schools is the Office of External Affairs and Communications, the Governance and Compliance Division, Human Resources, the Strategic Partnerships Office, parts of the Finance Division, Legal Services, parts of Research Services and Reprographics.

5. The University is the registered freehold proprietor of Greenwich House under title number CB337595.

6. The University is also the freehold proprietor of Senate House, Senate House Yard, and the Old Schools. Whilst currently unregistered, this land is pending first registration at Land Registry under title number CB489602. A statutory declaration of Richard Griffin, dated 3 September 2024, confirms:

“That to the best of my knowledge information and belief the University is the freehold owner of the land shown edged red.

That to the best of my knowledge information and belief the said Chancellor Masters and Scholars for the time being of the University have been for the past

seventy-five years and upwards in the free and uninterrupted possession and enjoyment of or in receipt of the rents and profits of the Property without any adverse claim and that they are now seized in fee simple in possession of the Property.”

7. The location of the Land is shown on Plan A attached to the Claim Form. The precise extent of the Land is set out on Plan 1 and Plan 2 attached to the Claim Form.

III. DIRECT ACTION ON THE LAND

8. Based on the statements made by the Defendants and their previous actions, the University believes that there is a real and imminent risk of the Defendants carrying out further direct action on the Land.
9. The Defendants have previously carried out direct action on the Land. In particular:
 - 9.1 On 15 May 2024, the Defendants set up an encampment on Senate House Yard. They remained there until 16 May 2024 and, in doing so, forced the University to move its graduation ceremonies to another location.
 - 9.2 On 22 November 2024, the Defendants gained access to, and barricaded themselves within, Greenwich House, blocking the entrances and exits to University staff. They remained there until 6 December 2024 and, whilst in the building, gained access to restricted areas and confidential and commercially sensitive information. This necessitated the University bringing proceedings to prohibit the dissemination of confidential information obtained within the building.
 - 9.3 On 27 November 2024, the Defendants again set up an encampment on Senate House Yard. They remained there until 30 November 2024 and, in doing so, forced the University to move its graduation ceremonies to another location.

10. The Defendants have not indicated any intention to desist from carrying out this sort of direct action in the future. Their social media channels remain active and the demands posted on those channels remain the same as before.
11. Rather, statements published by the Defendants suggest that they intend to repeat their acts of direct action. For example, on 30 November 2024, after the Defendants had left Senate House Yard, Cambridge for Palestine published a post on social media stating, "*We will be back*", under the tag line "*We Will Not Stop. We Will Not Rest*". Similarly, even after the ceasefire between Israel and Hamas was announced on 15 January 2025, Cambridge for Palestine announced the following on its social media channels on 18 January 2025:

"CEASEFIRE TODAY... LIBERATION TOMORROW...

We commit to continuing the struggle from the belly of the beast, in unequivocal solidarity with the pursuit of a free Palestine, from the river to the sea."

12. Further, on 21 January 2025, Cambridge for Palestine posted the following message on Instagram:

"As we honor the relief and joy of the steadfast people of Gaza, we recommit ourselves to the struggle against the complicity of our institutions, in pursuit of a free Palestine."
13. Moreover, Cambridge for Palestine recently endorsed the occupation of the Radcliffe Library in Oxford University by Oxford Action for Palestine, which commenced on 24 January 2025 and was ended by police intervention within 24 hours. A number of the individuals arrested were not students of Oxford University.

IV. CAUSES OF ACTION

14. The Claimant apprehends that, unless restrained by the Court, the Defendants will carry out acts amounting to trespass and nuisance on the Land.

15. In relation to trespass, students and members of the public may not, without the University's express consent: (1) enter, occupy or remain upon the Land; (2) block, prevent, slow down, obstruct or otherwise interfere with the access of any other individual to the Land; or, (3) erect or place any structure (including, for example, tents or other sleeping equipment) on the Land, for the purpose of carrying out a protest, or taking part in any demonstration, public assembly or encampment.
16. No member of the public has, generally, been granted a licence to be on the Land or carry out these acts.
17. Although students of the University have a licence to enter some of the University's land for certain purposes, this does not extend to the actions referred to above on the Land. This is because:
 - 17.1. No student has a general licence to enter Greenwich House, Senate House or the Old Schools. These areas are not generally accessible to students without the University's consent.
 - 17.2. In respect of Senate House Yard, whilst not a student space, it is generally open to students insofar as one of its gates is open and there is no event taking place there but even then only for certain purposes. However:
 - 17.2.1 By accepting an offer to study at the University and by the Terms of Admission, §31, students must comply with the University's Rules of Behaviour and Code of Practice of Freedom of Speech.
 - 17.2.2 By the Rules of Behaviour:
 - "1. A registered student must:
 - (a) comply with instructions issued by any person or body authorized to act on behalf of the University, in the proper discharge of their duties;
 - (b) comply with all health and safety regulations and instructions issued by the University, a College or other associated institution;

...

(d) comply with the terms of the code of practice issued under the provisions of section 43 of the Education (No. 2) Act 1986 regarding meetings and public gatherings on University Premises;

(e) comply with the Statutes and Ordinances and any rules and procedures established under the Statutes and Ordinances.

2. A registered student must not:

(a) interfere or attempt to interfere in the activities of the University, a College, or any member of the collegiate University community in the pursuit of their studies or in the performance of their duties;

(b) damage, misappropriate or occupy without appropriate permission any University or College property or premises, or any property or premises accessed as a result of a College or University activity

..."

17.2.3 By the Code, Rule 6.7 provides that *"Where any person or body to whom this Code of Practice applies is seeking to hold a University event or meeting on University premises which is outside of the normal academic curriculum the processes in the Annex shall be followed"*. The Annex states:

"A3. Permission is required for meetings and events to be held on University premises, whether indoors or outdoors. In the case of accommodation assigned to a single Faculty or Department, the permission of the relevant Faculty or Departmental authorities is required. In the case of accommodation not so assigned, permission must be obtained from the central University authority responsible for the accommodation concerned and, if a room is to be reserved, a booking must be made through that authority at least fourteen working days in advance of the proposed event. Further details of who to contact are available in the University's Guidance for Booking Meetings and Events."

18. Direct action on the Land by the Defendants would amount to a breach of paragraphs 1(a), 1(d), 2(a) and 2(b) of the Rules of Behaviour as well as A.3 of the Code.

19. Consequently, the Defendants would have no licence and would be committing a trespass if they were, for the purpose of carrying out a protest or taking part in any demonstration, public assembly or encampment: (1) to enter, occupy or remain upon the Land; (2) to block, prevent, slow down, obstruct or otherwise interfere with the access of any other individual to the Land; or, (3) to erect or place any structure (including, for example, tents or other sleeping equipment) on the Land.

20. In relation to nuisance, the threatened acts referred to at §§8-13 above would also amount to an undue and substantial interference with the Claimant's enjoyment of the Land.

V. RELIEF SOUGHT

21. In light of the above, the Claimant seeks injunctive relief to prevent the apprehended trespasses and nuisance.

VI. IDENTITIES OF THE DEFENDANTS

22. The Claimant is not aware of the identities of specific individuals who are planning to carry out direct action on the Land. This is because such direct action has not yet occurred. Even once it occurs, the Claimant would likely be unable to identify the participating individuals unless their details were provided by the police following arrest.

VII. SERVICE/NOTIFICATION

23. Pursuant to *Wolverhampton CC v London Gypsies & Travellers* [2024] 2 WLR 45, the Claimants are not able to serve Persons Unknown. Rather, the Claimants propose to notify Persons Unknown of the Claim Form, the Application Notice and evidence in support by taking the following steps:

23.1. Uploading a copy onto the following website: www.cam.ac.uk/notices.

- 23.2. Sending an email to cambridge4palestine@proton.me, encampmentnegotiations@proton.me and bloodonyourhands@systemli.org stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above.
- 23.3. Affixing a notice at those locations marked with an “x” on Plan 1 and Plan 2 setting out where these documents can be found and obtained in hard copy.

VIII. HUMAN RIGHTS

24. The rights protected by Articles 10 and 11 ECHR (rights to freedom of expression and assembly) do not provide a defence to this claim. This is because Articles 10 and 11 ECHR include no right to trespass on private property and thereby override the rights of private landowners: *DPP v Cuciurean* [2022] 3 WLR 446 (DC), §§40-50; *Ineos Upstream v Persons Unknown* [2019] 4 WLR 100 (CA), §36 (Longmore LJ).
25. Even if it were found that an injunction would amount to an interference with the Defendants’ Article 10/11 ECHR rights by a public authority, any such interference would be justified in that:
- 25.1. The University has the legitimate aim of vindicating its own property rights and carrying out lawful activities on its land, thereby protecting the interests of its students and staff.
- 25.2. There is a rational connection between obtaining an injunction and furthering those legitimate aims.
- 25.3. There are no less restrictive alternative means available to achieve the aims.
- 25.4. An injunction would represent a fair balance between the competing rights. In particular:

- 25.4.1. The nature of the direct action is such as to exclude the use of the Land by the Claimant and all others who have a lawful right to be there.
- 25.4.2. Direct action, by which the Defendants are seeking to compel others to act in a certain way, rather than persuade them, is not at the core of Article 10/11 ECHR rights.
- 25.4.3. The Defendants have no licence or other right to carry out the direct action.
- 25.4.4. The Defendants have now carried out direct action on the Land on three separate occasions at great disruption to the University, the Colleges, staff, students and the guests of students.
- 25.4.5. There is no connection between the Land and the substance of the Defendants' protest.
- 25.4.6. The Defendants are able to protest at other locations without causing significant disruption to the University, its staff and students.

AND THE CLAIMANT CLAIMS

- (1) An order that until 12 February 2030 the Defendants must not, without the consent of the Claimant:
 - a. Enter, occupy or remain upon the Land.
 - b. Block, prevent, slow down, obstruct or otherwise interfere with the access of any other individual to the Land.
 - c. Erect or place any structure (including, for example, tents or other sleeping equipment) on the Land.
- (2) Costs; and,

(3) Further and/or other relief.

YAASER VANDERMAN

Brick Court Chambers

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:

A handwritten signature in blue ink, appearing to read 'Yasir Vanderman', is placed over a light blue rectangular background.

13.3.2025

Dated:

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

CLAIM NO: KB-2025-000497

BETWEEN:-

THE CHANCELLOR, MASTERS AND SCHOLARS
OF THE UNIVERSITY OF CAMBRIDGE

Claimant

- v -

PERSONS UNKNOWN

Defendants

- and -

THE EUROPEAN LEGAL SUPPORT CENTRE

Intervener

ORDER

PENAL NOTICE

IF YOU THE WITHIN DEFENDANTS OR PERSONS UNKNOWN OR ANY OF YOU
DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH
THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY
BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING
WHICH HELPS OR PERMITS THE DEFENDANTS OR PERSONS UNKNOWN TO
BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF
COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS AND PERSONS UNKNOWN

This Order prohibits you from doing the acts set out in this Order. You should read it very carefully. You are advised to consult a solicitor as soon as possible. You have the right to ask the Court to vary or discharge this Order.

UPON the Claimant's claim by Claim Form, dated 12 February 2025, and its application for an injunction, dated 12 February 2025 (the "**Application**")

AND UPON Mr Justice Fordham hearing the Claimant's Application on 27 February 2025

AND UPON the Order of Mr Justice Fordham, dated 27 February, granting the Claimant interim injunctive relief until 23:00 on 1 March 2025 (the "**27 February Order**") in relation to part of the Land but otherwise adjourning the Application for further consideration at a return hearing

AND UPON hearing the Claimant's application of 13 March 2025 to amend the description of the Defendants to "Persons Unknown"

AND UPON hearing Counsel for the Claimant and Counsel for the European Legal Support Centre on 19 March 2025

AND UPON the Claimant giving and the Court accepting the undertaking set out in Schedule 2 to this Order

AND UPON the "Land" being defined as (a) Senate House and Senate House Yard, Trinity Street, Cambridge, CB2 1TA; (b) The Old Schools, Trinity Lane, Cambridge, CB2 1TN; and, (c) Greenwich House, Madingley Rise, Cambridge, CB3 0TX, as shown for identification edged red on the attached Plan 1 and Plan 2 in Schedule 1

AND UPON paragraphs [98](#) - [101](#) of this Order being pursuant to the guidance in Wolverhampton CC v London Gypsies & Travellers [2023] UKSC 47

IT IS ORDERED THAT:

PERSONS UNKNOWN

1. The description of the Defendants in the Claim Form and Particulars of Claim is amended to “Persons Unknown”. Permission is granted to amend the Claim Form and Particulars of Claim to reflect this change in description.

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INJUNCTION

1.2. Until 23:00 on 26 July 2025 or final determination of the claim or further order in the meantime, whichever shall be the earlier, the Defendants must not, without the consent of the Claimant, enter, occupy or remain upon the Land.

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2.3. Until 23:00 on 26 July 2025 or final determination of the claim or further order in the meantime, whichever shall be the earlier, the Defendants must not, without the consent of the Claimant, directly block the access of any individual to the Land with the intention of stopping that individual accessing the Land.

3.4. Until 23:00 on 26 July 2025 or final determination of the claim or further order in the meantime, whichever shall be the earlier, the Defendants must not, without the consent of the Claimant, erect or place any structure (including, for example, tents or other sleeping equipment) on the Land.

4.5. In respect of paragraphs 1.2-3.4, the Defendants must not: (a) do it himself/herself/themselves or in any other way; (b) do it by means of another person acting on his/her/their behalf, or acting on his/her/their instructions.

VARIATION

5.6. Anyone served with or notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person.

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

7.8. The Claimant has liberty to apply to vary this Order.

SERVICE AND NOTIFICATION

8.9. This Order shall be notified to Persons Unknown by the Claimant carrying out each of the following steps:

- a. Uploading a copy of the Order onto the following website:
www.cam.ac.uk/notices.
- b. Sending an email to the email addresses listed in Schedule 3 to this Order attaching a copy of this Order.
- c. Affixing a copy of the Order in A4 size in a clear plastic envelope at those locations marked with an "x" on Plan 1 and Plan 2 in Schedule 1.
- d. Affixing warning notices of A4 size at those locations marked with an "x" on Plan 1 and Plan 2 in Schedule 1.

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9.10. Notification to Persons Unknown of any further applications shall be effected by the Claimant carrying out each of the following steps:

- a. Uploading a copy of the Order onto the following website:
www.cam.ac.uk/notices.
- b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that an application has been made and that the application documents can be found at the website referred to above.
- c. Affixing a notice at those locations marked with an "x" on Plan 1 and Plan 2 in Schedule 1 stating that the application has been made and where it can be accessed in hard copy and online.

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~~10-11.~~ Notification of any further documents to Persons Unknown may be effected by carrying out the steps set out in paragraph ~~109~~(a)-(b) only.

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~~11-12.~~ In respect of paragraphs ~~98-101~~ above, effective notification will be deemed to have taken place on the date on which all of the relevant steps have been carried out.

~~12-13.~~ For the avoidance of doubt, in respect of the steps referred to at paragraphs ~~89~~(c)-(d) and ~~109~~(c), effective notification will be deemed to have taken place when those documents are first affixed regardless of whether they are subsequently removed.

FURTHER DIRECTIONS

~~13-14.~~ Any contempt application against any Person Unknown may only be brought with the permission of the Court.

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~~14-15.~~ Liberty to apply.

~~15-16.~~ Costs are reserved.

COMMUNICATIONS WITH THE CLAIMANT

~~16-17.~~ The Claimant's solicitors and their contact details are:

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Mills & Reeve LLP, Botanic House, 100 Hills Rd, Cambridge, CB2 1PH

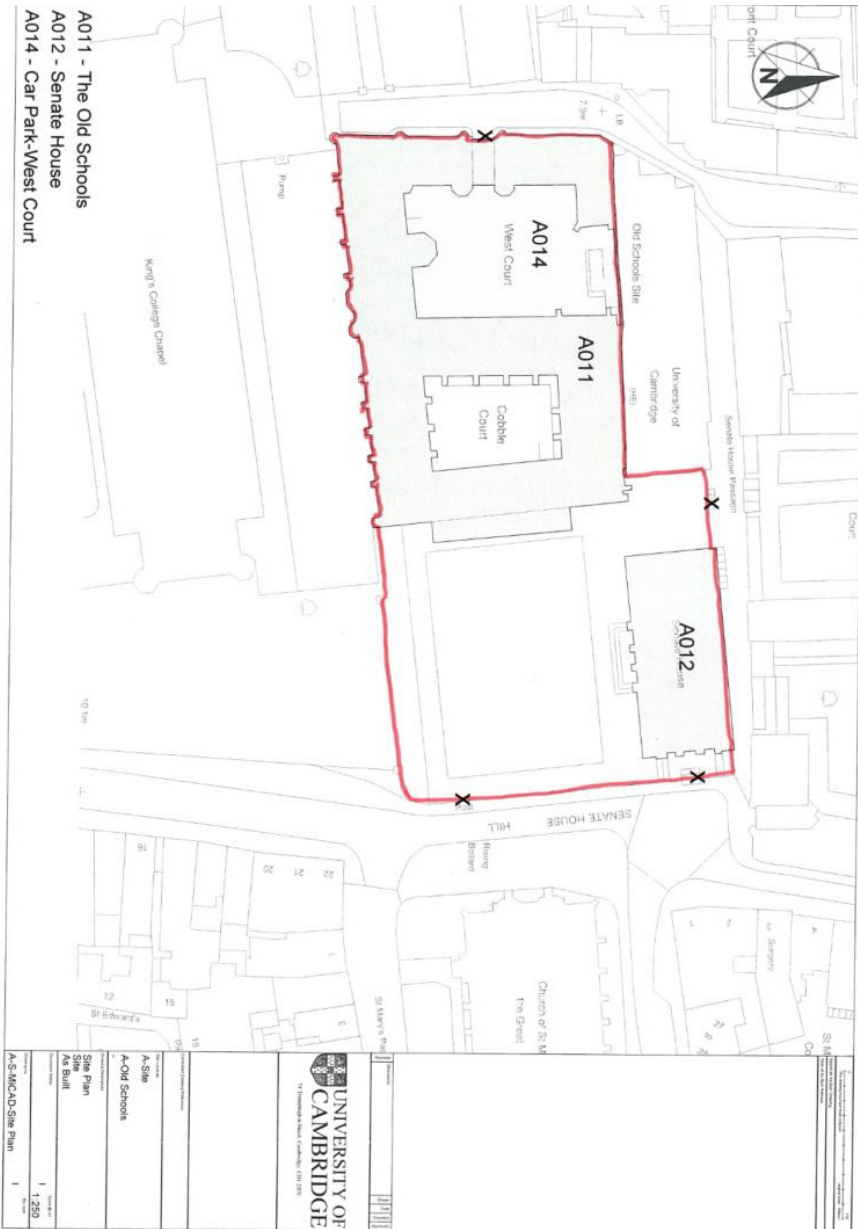
Ref: 0001200-1698

Email address: millsreeve100@mills-reeve.com

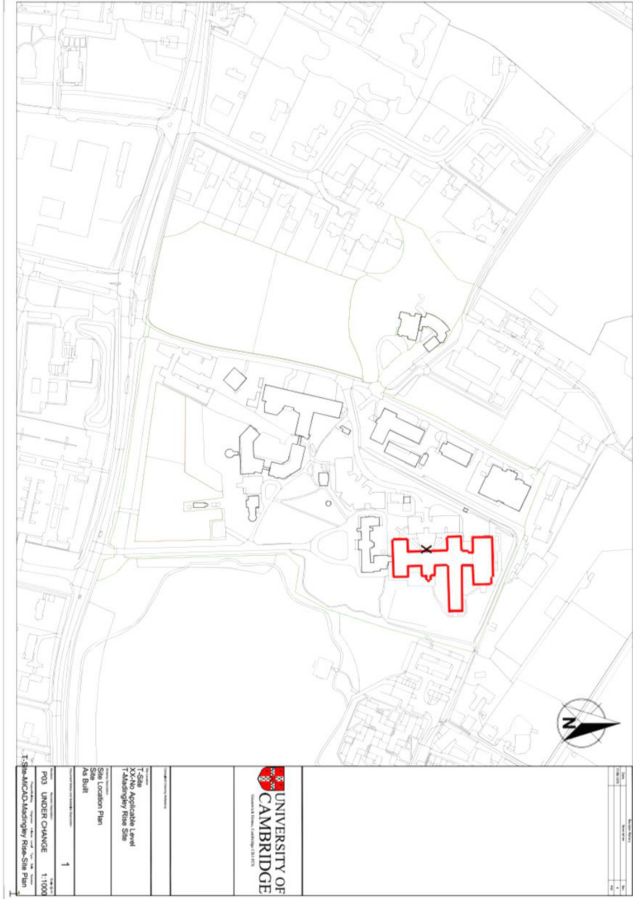
Dated: [] March 2025

SCHEDULE 1 - PLANS

Plan 1



[Plan 2]



SCHEDULE 2 - UNDERTAKING GIVEN BY THE CLAIMANT

The Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunctions in paragraphs ~~21-43~~ of this Order have caused loss to a future Defendant and the Court finds that the future Defendant ought to be compensated for that loss.

SCHEDULE 3 - EMAIL ADDRESSES

- cambridge4palestine@proton.me
- encampmentnegotiations@proton.me
- bloodonyourhands@systemli.org

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