

**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):**

- (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**

**Defendants**

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**PARTICULARS OF CLAIM**

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**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, 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 is 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 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 it is only open to students 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](http://www.cam.ac.uk/notices).

23.2. Sending an email to [cambridge4palestine@proton.me](mailto:cambridge4palestine@proton.me), [encampmentnegotiations@proton.me](mailto:encampmentnegotiations@proton.me) and [bloodonyourhands@systemli.org](mailto: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: Samuel Maw, Partner, Mills & Reeve LLP, as authorised by  
the Claimant

Dated: 12 February 2025