

**CLAIM NO: KB-2025-000497**

**IN THE HIGH COURT OF JUSTICE**

**KING'S BENCH DIVISION**

BETWEEN:

THE CHANCELLOR, MASTERS, AND  
SCHOLARS OF THE UNIVERSITY OF  
CAMBRIDGE

Claimant

and

PERSONS UNKNOWN (AS DESCRIBED IN  
THE CLAIM FORM)

Defendants

EUROPEAN LEGAL SUPPORT CENTER

Intervener

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**FIRST WITNESS STATEMENT OF  
PAUL OLIVER**

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**Mills & Reeve LLP**

1 St James Court  
Whitefriars  
Norwich  
NR3 1RU

Tel: 01603 693346

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Ref: NCBRA/0001200-1698

753901961\_1

Solicitors for the  
Claimant

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I, **PAUL OLIVER**, of The University of Cambridge, Security Office, Third Floor, Cockcroft Building, New Museums Site, Pembroke Street, Cambridge, CB3 3QZ, will say as follows:

- 1 I am the Deputy Security Operations Manager for the Claimant in these proceedings, which I refer to in this witness statement as “the University”. I am authorised to make this witness statement on behalf of the University.
- 2 Where matters referred to in this witness statement are derived from my own knowledge, they are true; where they are derived from documents or from information supplied by other members and employees of the University or other parties, they are true to the best of my knowledge and belief.
- 3 There is now produced and shown to me a bundle of documents marked “PO1” to which I refer to in this witness statement. References to page numbers are to pages of “PO1”. **Page 18** of PO1 includes an electronic link to three video recordings taken by the University’s security team on their body cameras.

- 4 A rally was organised to start at 4:30pm on Wednesday 19 March 2025 on King's Parade, the road in front of and adjacent to King's College, Cambridge and Senate House. A social media publication advertising the rally by the group, Cambridge for Palestine, is reproduced at **page 1**. There are reproduced at **pages 19-26** social media publications by the group, Cambridge for Palestine, in conjunction with other groups, which show photographs of the rally. The image at **page 24** shows placards that were affixed to the exterior of the windows of Senate House either late Monday 17 March or in the early hours of Tuesday 18 March, which the University has not yet been able to remove.
- 5 There is at **page 18** a link to video footage under the description "Video 1" that was recorded by one of my colleagues on their body camera. There are seven stills of that video footage that are reproduced at **pages 2-5**. Some of the stills in the exhibit are accompanied with descriptions of what the footage shows and a transcript of excerpts of some of the audio in the video footage.
- 6 This video footage was recorded from approximately 16:53 to 17:04. It shows participants in the rally walking along Trinity Lane towards and gathering around the Gatehouse of The Old Schools (or otherwise known as West Court), the gate and façade of which was recently vandalised on 4 March 2025. The image identified, "Still 1", at **page 2** shows the participants approaching the Gatehouse. In the corresponding video footage, participants can be heard chanting:
- "We will not be silenced"*
- "We will not stop, we will not rest, disclose, divest".*
- 7 Also, in the image, and in the corresponding video footage, participants can be seen carrying a banner which reads:
- "We will not be silenced"*
- 8 At approximately 16:57, the image identified as "Still 2" at **page 2** and the corresponding video footage shows a person giving a speech. The audio recorded in the video suggests that this person is a representative from, "Youth Demand". This group describes itself as young people who are demanding that the government *"stop all trade with Israel; impose a total trade embargo on Israel"*. There are reproduced at **pages 9-17** extracts from the group's website.

- 9 Starting at approximately 16:58, the video footage records the speaker saying as follows:

*“...the question I have for you today as a representative of Youth Demand is what are you going to do, are you gonna realise that what we are doing right now, that rallying and chanting is not enough. We can’t just shout anymore. We have to materially disrupt the genocidal machine, that is what we have to do, it’s no good just saying we are not comply with it, we have to actively resist and that is what Palestine Action did a couple of weeks ago, and that is what Youth Demand is planning to do, Youth Demand in April is going to swarming numbers for an entire month, we’re going to be getting a thousand people into the streets of London and blockading roads for 15 minutes and then [disturbing] before police start making arrests. This is what it’s going to take, it’s going to take months and months of direct action, it’s going to take months of disruption, it’s going to take all of you to think about what you can do more, and do it because this is not enough we need to escalate we need to do more. So, if you know what we are doing right now is not enough and if you know what we have to do is escalate please come and join Youth Demand by signing up at [youthdemand.org](http://youthdemand.org) and signing up for action.”*

- 10 After the speech finishes, in the video footage, participants in the rally can be heard chanting:

*“Shut it down, shut it down”*

*“We will not be silenced”*

- 11 There is at **page 18** a link to video footage under the description “Video 2” that was recorded by one of my colleagues on their body camera from within Senate House Yard between 17:39 and 18:02. In this video footage, the rally can be seen to move from Trinity Street and gather outside Great St Mary’s Church. A number of speeches took place. Stills 8 to 11 at **pages 6-8** are taken from this video footage.

- 12 Also, there is video footage that can be accessed by the link at **page 18** titled, “Video 3” that was recorded by one of my colleagues on their body camera from behind the doors of The Old Schools and within its grounds between 16:54 and 17:04.

13 My colleagues received a message on behalf of several staff within The Old Schools asking for advice on exiting the building while the rally was convened outside The Old Schools and Senate House Yard. My team advised staff not to leave for a short while. Once the rally had moved on from the Gatehouse, my colleagues directed staff members to exit the building via this entrance.

**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:



.....

Name: PAUL OLIVER

Dated: 20/03/2025 .....

**IN THE HIGH COURT OF JUSTICE**  
**BUSINESS AND PROPERTY COURTS**  
**OF ENGLAND AND WALES**  
**BUSINESS LIST (ChD)**

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**EXHIBIT PO1**

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Post



King's College, Cambridge

# 400+ KILLED IN GAZA EMERGENCY RALLY: STOP THE GENOCIDE

## WEDS 4:30 PM KING'S PARADE



874 likes

**cambridgeforpalestine** 🚨 EMERGENCY RALLY-  
WEDNESDAY, 4:30 PM @ KING'S PARADE 🚨

Over 400 killed as israel is launching deadly airstrikes on Gaza and escalating its military raids in the West Bank—all during the sacred month of Ramadan and in blatant abandonment of the ceasefire. Meanwhile, Cambridge University is attempting to criminalise solidarity with Palestine through a High Court injunction while continuing to invest in companies complicit in genocide. We will not be silenced

[Use the app](#)





"Video 1" [16:53:28] – [17:04:30]

*Still 1*



*Description / transcription of excerpts of audio*

The banner being carried reads "We will not be silenced".

Chants of "We will not be silenced" and "We will not stop, we will not rest, disclose, dives".

*Still 2*





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*Description / transcription of excerpts of audio*

16:57:07 – a speech starts from a person identifying as a representative from Youth Demand (<https://youthdemand.org/>)

16:58:33 –16:59:15: the speaker says

*“...the question I have for you today as a representative of Youth Demand is what are you going to do, are you gonna realise that what we are doing right now, that rallying and chanting is not enough. We can't just shout anymore. We have to materially disrupt the genocidal machine, that is what we have to do, it's no good just saying we are not comply with it, we have to actively resist and that is what Palestine Action did a couple of weeks ago, and that is what Youth Demand is planning to do, Youth Demand in April is going to swarming numbers for an entire month, we're going to be getting a thousand people into the streets of London and blockading roads for 15 minutes and then [disturbing] before police start making arrests. This is what it's going to take, it's going to take months and months of direct action, its going to take months of disruption, it's going to take all of you to think about what you can do more and do it because this is not enough we need to escalate we need to do more. So if you know what we are doing right now is not enough and if you know what we have to do is escalate please come and join Youth Demand by signing up at youthdemand.org and signing up for action”*

*Still 3*



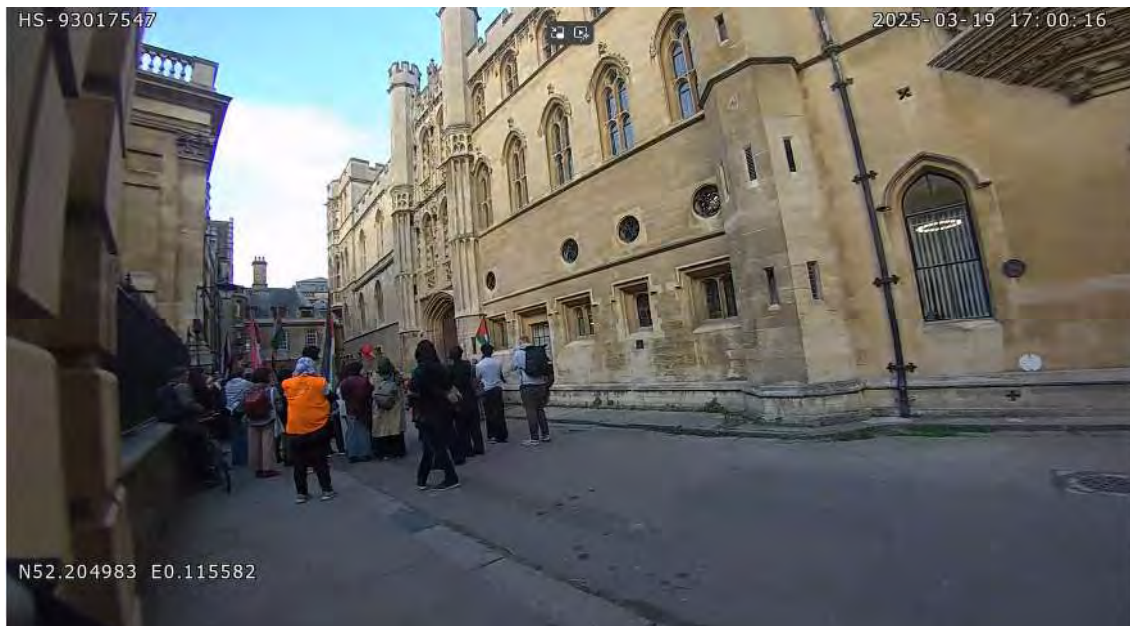
*Still 4*



*Description / transcription of excerpts of audio*

Chanting of "Shut it down, shut it down" [17:00]

*Still 5*



*Description / transcription of excerpts of audio*

Chanting of "We will not be silenced" [17:02:49]



Still 6

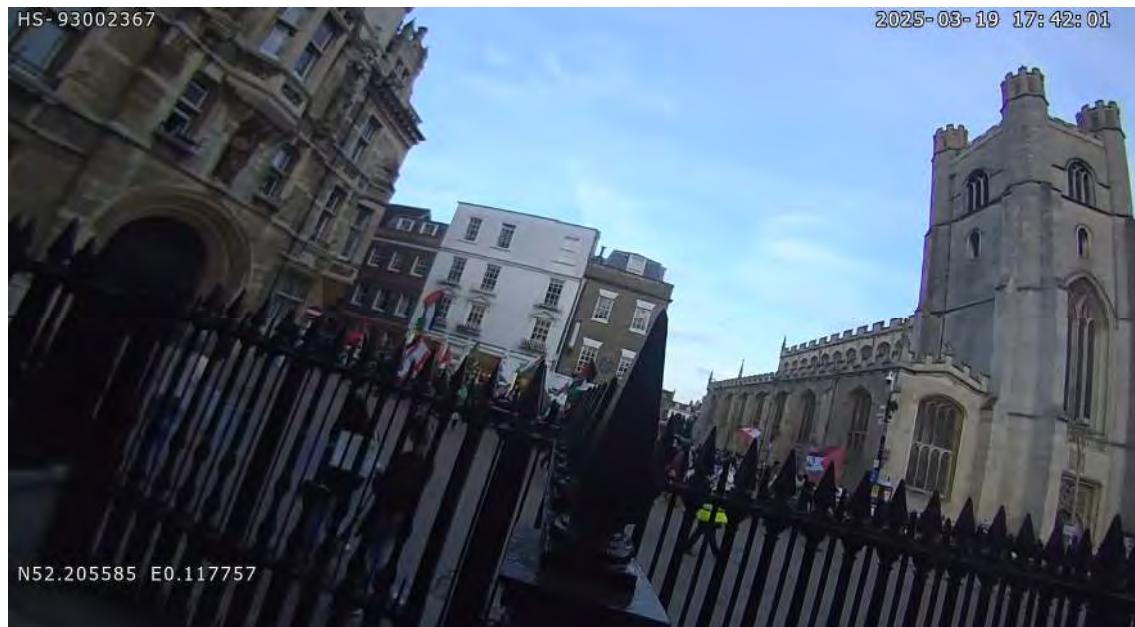


Still 7



"Video 2" [17:39 – 18:02]

*Still 8*



*Still 9*





Still 10



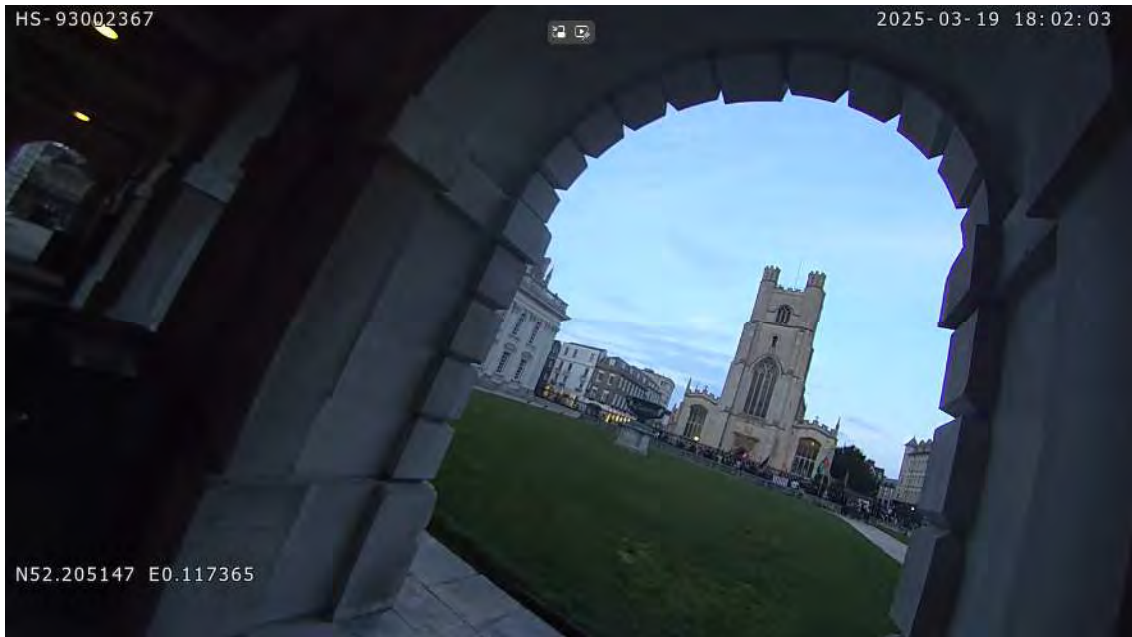
Still 11



*Description / transcription of excerpts of audio*

17:57:53 – chants of “enough is enough”

Still 12



"Video 3" – behind the doors of The Old Schools [16:54:20 – 17:04:32]

Chants "We will not stop, we will not rest, disclose, divest"



# **YOUNG PEOPLE ARE RESISTING**

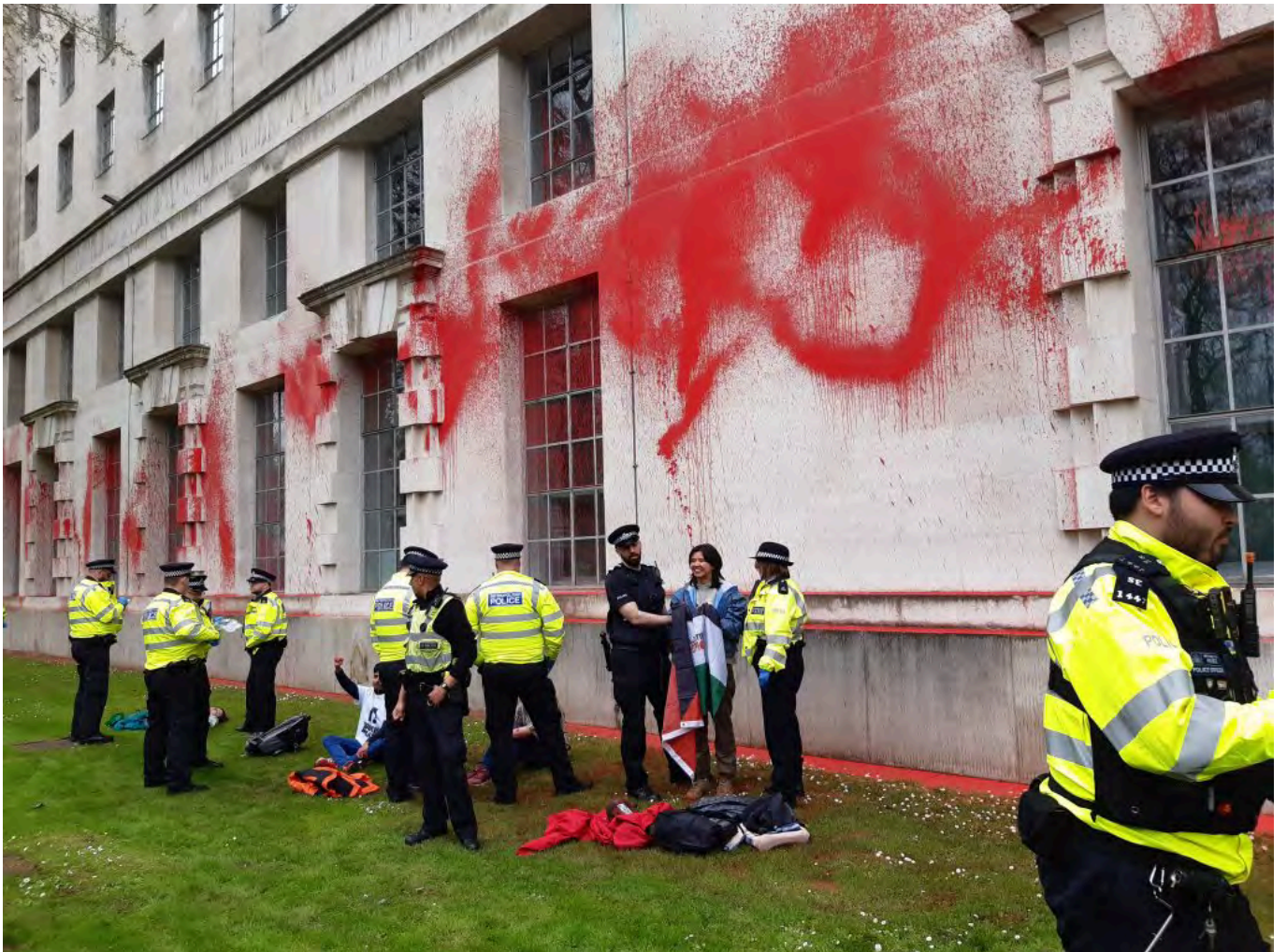
**JOIN A MONTH OF DAILY COORDINATED ACTIONS  
IN LONDON THIS APRIL!**

**TAKE ACTION**

**DONATE TO MAKE ACTIONS HAPPEN**









**The government is engaging in absolute evil. They are enabling genocide in Palestine by sending money and arms to Israel. They are contributing to the murder of billions to keep the fossil fuel profits flowing.**

**Young people are stepping up to resist this nightmare. We are demanding that the government must:**

- 1. Stop all trade with Israel: impose a total trade embargo on Israel.**
- 2. Make the rich pay: raise £1Tr by 2030 from the super rich and fossil fuel elite to pay damages to communities and countries harmed by fossil fuel burning.**

**Until these demands are met, we will be in nonviolent resistance against this rigged political system and the people with blood on their hands.**

First name \*

Last name

Email ^

Phone number ^

Postcode \*

Country \*

United Kingdom

- I agree to the privacy policy and terms of use \*
- I would like to receive essential emails updates from Youth Demand  
(you can unsubscribe at any time)

\* required fields, ^ one of these fields is required

Register

**CURIOUS ABOUT RESISTANCE? COME TO AN  
EVENT**

19 Mar 19:00 - 21:00	Online Welcome Talk	zoom.us	
20 Mar 18:30 - 20:30	Welcome Talk	London, WC2N 4EA	<a href="#">Register</a>
21 Mar 19:00 - 20:00	Social	Exeter, EX4 6ST	<a href="#">Register</a>
22 Mar 18:30 - 21:00	Social	London, E2 9PL	<a href="#">Register</a>
23 Mar 11:00 - 12:00	Nonviolence Training	London, EC1V 9DX	<a href="#">Register</a>

## CONTACT US

[GENERAL INQUIRIES? youthdemand@proton.me](mailto:youthdemand@proton.me)

[PRESS INQUIRIES? youthdemandpress@protonmail.com](mailto:youthdemandpress@protonmail.com)

27 Mar 18:00 - 20:00	Welcome Talk	Manchester, M15 6ED	<a href="#">Register</a>
27 Mar 18:30 - 20:30	Welcome Talk	London, WC2N 4EA	<a href="#">Register</a>
28 Mar 19:00 - 20:00	Social	Exeter, EX4 6ST	<a href="#">Register</a>
29 Mar 13:00 - 17:00	Nonviolence Training	Leeds, LS2 9DX	<a href="#">Register</a>
29 Mar 18:00 - 21:00	Film Screening	Manchester, M20 3ED	<a href="#">Register</a>
01 Apr 06:00 - 27 Apr 18:00	Action Phase	London, SW1A	<a href="#">Register</a>

# **STOP THE KILLING. SHUT IT DOWN**

**In April, Youth Demand will shut London down with swarming road-blocks day after day after day.**

**Join us in our biggest civil disobedience campaign yet to force action from the criminal British government.**



**In 2024, we built a national youth resistance organisation. We mobilised over a thousand people to pull off 60 actions, from blockading central London during the summer, plastering a picture from the Gaza genocide on a Picasso painting and shutting down five UK cities in November.**





**In April we are bringing things to a whole new level. We will shut down genocidal 'business as usual' in London for a month straight. It's time for every single person to be in resistance.**

**Sign up for action below!**

# Action Phase

01 Apr 06:00 - 27 Apr 18:00

National Month of Action

STOP THE KILLING. SHUT IT DOWN

In April, Youth Demand will shut London down with swarming road-blocks day after day after day. Join us in our biggest civil disobedience campaign yet to force action from the criminal British government.

In 2024, we built a national youth resistance organisation. We mobilised over a thousand people to pull off 60 actions, from blockading central London during the summer, plastering a picture from the Gaza genocide on a Picasso painting and shutting down five UK cities in November.

In April we are bringing things to a whole new level. We will shut down genocidal 'business as usual' in London for a month straight. It's time for every single person to be in resistance.

**Whitehall**  
**London**  
**SW1A**

**ACTION CURIOUS? COME TO A TRAINING!**

23 Mar 11:00 - 15:00	Nonviolence Training	London, EC1Y 0SA	<a href="#">Register</a>
27 Mar 18:00 - 22:00	Nonviolence Training	Leeds, LS6 1NP	<a href="#">Register</a>
29 Mar 13:00 - 17:00	Nonviolence Training	Leeds, LS2 9DX	<a href="#">Register</a>
01 Apr 18:00 - 21:00	Nonviolence Training	Manchester, M13 9PR	<a href="#">Register</a>
01 Apr 18:00 - 21:00	Nonviolence Training	Manchester, M13 9PR	<a href="#">Register</a>



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[PRESS INQUIRIES? youthdemandpress@protonmail.com](mailto:youthdemandpress@protonmail.com)

Video footage

<https://millsreeve.sharefile.eu/f/fo7ee192-10dd-4976-9b50-d659e9a435a3>





# Post



wpho.tog and 2 others



50 likes

**wpho.tog** Cambridge for Palestine marched from Kings Parade, to Old School, to Trinity College, ending outside Senate House today to demand the University divests from arms companies that support Israel's Genocide.

Cambridge University is complicit in the ongoing Israeli genocide in Gaza. Cambridge University is complicit in the killing of over 61,709 people in Gaza.

Cambridge University **MUST** divest from Israeli Weaponry!

8 hours ago

[Use the app](#)







# Post



50 likes

**wpho.tog** Cambridge for Palestine marched from Kings Parade, to Old School, to Trinity College, ending outside Senate House today to demand the University divests from arms companies that support Israel's Genocide. Cambridge University is complicit in the ongoing Israeli genocide in Gaza. Cambridge University is complicit in the killing of over 61,709 people in Gaza. Cambridge University MUST divest from Israeli Weaponry!  
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