

1.	Claimants
2.	Richard Joseph Jordan
3.	Third
4.	RJ10
5.	Date: 27 July 2020

Claim No: PT-2018-000098

**IN THE HIGH COURT OF JUSTICE  
BUSINESS AND PROPERTY COURTS  
PROPERTY, TRUSTS AND PROBATE LIST (ChD)**

**B E T W E E N:**

(1) THE SECRETARY OF STATE FOR TRANSPORT

(2) HIGH SPEED TWO (HS2) LTD

Claimants/Applicants

-and-

(1) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE  
CONSENT OF THE CLAIMANT(S) ON LAND AT HARVIL ROAD, HAREFIELD IN  
THE LONDON BOROUGH OF HILLINGDON SHOWN COLOURED GREEN, BLUE  
AND PINK AND EDGED IN RED ON THE PLANS ANNEXED TO THE RE-  
AMENDED CLAIM FORM

(2) PERSONS UNKNOWN SUBSTANTIALLY INTERFERING WITH THE  
PASSAGE BY THE CLAIMANTS AND THEIR AGENTS, SERVANTS,  
CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES,  
INVITEES OR EMPLOYEES WITH OR WITHOUT VEHICLES, MATERIALS AND  
EQUIPMENT TO AND FROM THE LAND AT HARVIL ROAD SHOWN  
COLOURED GREEN, BLUE AND PINK AND EDGED IN RED ON THE PLANS  
ANNEXED TO THE RE-AMENDED CLAIM FORM

(3) to (35) THE NAMED DEFENDANTS LISTED IN THE SCHEDULE TO THE  
ORDER OF MR DAVID HOLLAND QC DATED 22 JUNE 2020

(36) PERSONS UNKNOWN CUTTING, DAMAGING, MOVING, CLIMBING ON  
OR OVER, DIGGING BENEATH OR REMOVING ANY ITEMS AFFIXED TO ANY  
TEMPORARY OR PERMANENT FENCING OR GATES ON OR AT THE  
PERIMETER OF THE HARVIL ROAD SITE, OR DAMAGING, APPLYING ANY  
SUBSTANCE TO OR INTEFERING WITH ANY LOCK OR ANY GATE AT THE  
PERIMETER OF THE HARVIL ROAD SITE WITHOUT THE CONSENT OF THE  
CLAIMANTS

Defendants / Respondents

---

**THIRD WITNESS STATEMENT OF  
RICHARD JOSEPH JORDAN**

---

I, Richard Joseph Jordan, of High Speed Two (HS2) Ltd, 2 Snowhill, Queensway,  
Birmingham, B4 6GA WILL SAY as follows:

1. I am the Second Claimant's Chief Security and Resilience Officer. This is my third witness statement in these proceedings. I shall refer to my first witness statement, dated 25 April 2019, as "Jordan 1" and my second witness statement dated 15 June 2020 as "Jordan 2". My role with the Claimants remains the same as described in Jordan 1.
2. I make this further statement, in support of the Claimants' application notice dated 15 June 2020, known as the "**Substantive Amendment Application**". The purpose of this Statement is to:
  - (i) provide a short reply to some of the factual matters and allegations which have arisen in the evidence in response to the Substantive Amendment Application. I also provide a short reply in relation to an unsigned 'Defence Statement' filed by D28 – Ms Pitwell, and which was provided to the Claimants' solicitors only during the hearing on 22 June 2020; and
  - (ii) set out the details of further specific incidents of trespass and obstruction that have occurred since 31 May 2020.
3. This statement is made from matters that are within my own knowledge and/or (unless other sources of information are stated) knowledge gained from my review of the Claimants' documents, incident reports logged on the Second Claimant's HORACE system, reports by the Second Claimant's security team and that of the Second Claimant's contractors, material obtained and reviewed from open source internet and social media platforms and reports from specialist agents instructed on behalf of the Second Claimant. In each I believe them to be true. There is now shown to me a paginated clip of documents which I exhibit hereto as RJ10. Page numbers without qualification refer to that exhibit.
4. Where I have referred to a plot number in this statement, those are to plot numbers on the plan at **p. 1 of RJ10** which is the current injunction plan.

#### **Specific responses to points raised by the Named Defendants – D3, D4 and D28**

5. I have seen a draft of Mr Perin's third witness statement ("**Perin 3**"). As mentioned in Perin 3, responses to the Substantive Amendment Application have been received

from D3, D4 and D28. I do not propose to comment on every point raised by each of these named Defendants in their evidence. Mr Perin has responded to many of the points in Perin 3. A large number of the points raised are general complaints about the HS2 project. I understand that the Court has made clear on several occasions that such complaints are not relevant to the matters in issue in these proceedings, and so I refrain from commenting on them. In respect of:

- (i) D3, Ms Green - a Second Witness Statement dated 17 June 2020 (“**Green 2**”) was filed and served shortly before the hearing of 22 June 2020. A third witness statement dated 13 July 2020 (“**Green 3**”) was filed in response to the Substantive Amendment Application in line with the directions given by Mr David Holland QC on 22 June 2020. In this statement, I comment only on some of the assertions made in Green 2. Mr Perin has responded to matters raised in Green 3.
- (ii) D4, Mr Keir - I respond only to the general and unparticularised assertion that (i) crimes are being committed by and on behalf of the HS2 project and the allegations made against the ‘National Eviction Team’ (“the **NET**”) and (ii) Mr Keir’s assertion in respect of the number of arrests and convictions secured in relation to incidents which have taken place at the Harvil Road Site. I also deal with an allegation that the eviction operation to recover Ryall’s Garage was unlawful.
- (iii) D28, Ms Pitwell – I respond only to some of the factual assertions she makes in relation to her trespass of Ryall’s Garage and (ii) her denial of trespass and assault asserted in Jordan 2. The allegations made against the NET more generally are covered by my response to Mr Keir’s statement.

### ***D3 – Sarah Green***

- 6. By Green 2, D3 has sought to reply to a number of factual assertions which were made in Jordan 2. I have made some comments in response to some of the points she has made in ‘Schedule 2’ to Green 2. The paragraph numbers referred to below relate to the paragraphs which Ms Green has identified in her Schedule 2 (being paragraphs of Jordan 2):

- (i) Paragraph 41: whilst Ms Green describes herself simply as “observing as a concerned member of the public”, during this incident, the photographic evidence at **p.17 of RJ9** clearly shows otherwise. I attach at **p. 2 of RJ10** a further photo showing Ms Green taken from a different angle. Ms Green is sitting on top of what is, presumably, an anti-HS2 banner next to the ‘locked-on’ protesters (D4 and D13). Ms Green’s presence alone can be described as an additional obstruction to the Land.
  
- (ii) Paragraph 42: Ms Green denies verbally abusing security at the Harvil Road Site. I attach at **p. 3 - 5 of RJ10** a contemporaneous report prepared on 19 November 2019 which records the following entry:
 

“16.40 Sarah green approached Harvil road HQ Giving the Security there verbal abuse. Police and hs2 helpline informed urn is 4783/19.11.2019 incident report sent to persons required.”
  
- (iii) Paragraph 45: Ms Green seems to deny the allegation that she trespassed on the Land during this incident. I exhibit to this statement at **p. 6 and p. 7 of RJ10** footage taken from body worn cameras during this incident. At 09:34:43 in the video, Ms Green can be seen in the background on Land covered by the injunction near to the foot of the tree. I accept that Ms Green is not one of the worst offenders on this date, however this is evidence of her trespass despite the terms of the injunction.
  
- (iv) Paragraph 46: Whilst Ms Green disputes the assertion that she was behaving in a disruptive manner she accepts being in “the area outside Gate 3”. This trespass at the gate is a breach of the 2019 Injunction (albeit the Claimants accept it is of a relatively minor nature).
  
- (v) Paragraph 47: Again, I note Ms Green accepts being in the area. Although she says that she did not do anything “unlawful”, she does not dispute that she was on the bell-mouth which is a trespass and a breach of the injunction.
  
- (vi) Paragraph 68: I note that Ms Green accepts being in Denham Country Park which is where plot C111\_108 is located (which can be seen on the current injunction plan). Whilst she denies disrupting works, she does not deny approaching contractors. Ms Green will be well aware that the very fact a

number of protesters approach contractors will inevitably lead to some delay in works as works cannot safely continue whilst protesters are present. Invariably therefore where there are protesters in the area, works are often temporarily paused or stopped completely.

- (vii) Paragraph 70: Ms Green's reply to this paragraph only serves to illustrate that she is willing to delay or disrupt the activities of HS2 or its contractors. She does not deny being on the land although disputes that she was disrupting works or that works were scheduled to take place. However she accepts that a *'large number of HS2 security and ground clearance workers'* were present which is indicative that works were being undertaken or were scheduled to be undertaken. I note she also accepts that 'strimming' works were due to take place which she thought would amount to an environmental crime.
- (viii) Paragraph 77: I note that Ms Green does not deny standing in front of the lorry or obstructing it in any way. Her only denial is that she was not standing still in the road at any one time.
- (ix) Paragraph 79: Again, Ms Green accepts she was present at the incident albeit states she was only there for a matter of minutes. I note that she does not specifically deny participating in the obstruction.

#### ***D4 – Mark Keir***

- 7. I note Mr Keir does not deny any of the factual assertions made against him. He clearly has many concerns in relation to the HS2 project as a whole but, again, I do not understand these concerns to be relevant to the Claimants' application which is before the Court. I do reply, briefly, however as follows:
  - (i) Mr Keir asserts that there is a "litany of crimes being committed by and on behalf of this project". In addition to environmental matters (which Mr Perin seeks to deal with further in Perin 3), Mr Keir specifically takes issue with the conduct of the National Eviction Team. Whilst Mr Keir has not particularised his complaints, I take him to mean the National Eviction Team who have been undertaking enforcement action at the Harvil Road Site either having been assigned writs to enforce by the First Claimant or the Second Claimant or

having been instructed to undertake enforcement work by the Second Claimant's security contractor, Control Risks Group Limited. Those instructions have, from time to time, included instructions to use 'self-help' powers to use reasonable force to remove trespassers from the Land. For the avoidance of doubt, it is not accepted that there is or has been any wrongdoing or criminal acts on behalf of the Claimants. Whilst we understand that many of the Defendants hold genuine beliefs, particularly in relation to the impact of the project on the environment, these unfounded allegations of unlawful conduct are taken very seriously by the Claimants.

- (ii) Insofar as the assertion that the protesters "*have been subjected to assault after assault, aggressive and violent bullying, hindrance of our human rights to food and water, to freedom of speech, freedoms of assembly and association, at the hands of the National Eviction Team*", this is denied. In relation to the 'National Eviction Team' ("**NET**"):
  - (a) The NET is part of the High Court Enforcement Group Limited ("**the HCE Group**"), one of the largest independent and privately owned firms of Authorised High Court Officers (AHCEOs) in the United Kingdom. I exhibit at **pp. 8 – 44 of RJ10** a document prepared by the HCE Group named '*AHCEO powers enforcing writs warrants and orders*'. This document sets out the various powers vested in an AHCEO and his or her enforcement officers to enforce warrants pursuant to compulsory purchase legislation, High Court Writs and common law enforcement as agents of the landowner.
  - (b) Where I have used the term HCEO in my previous statements, that is intended to mean an officer working for the HCE Group and not necessarily an officer working as and in the capacity of an authorised high court enforcement officer under the direction of the High Court in all instances. As I have explained, these same security professionals have also executed statutory warrants and used common law powers. I apologise if my use of the term "HCEO" has caused confusion: that is the term that my team and I have typically used to refer to the individual employees of the HCE Group.

- (c) The NET is a specialist eviction team with an excellent reputation and vast amounts of experience with removal of protesters unlawfully occupying land.
- (d) It is correct to say that the NET has been engaged to undertake enforcement work at the Harvil Road Site and that there is an NET presence currently at the Site. This is solely because of the continued and significant level of trespass and obstruction that the Claimants suffer at the Harvil Road Site and the need for the site to be adequately protected and for any incursions to be professionally and swiftly removed in order to prevent further delay to works. Whilst the injunction does provide effective assistance on the ground, it is clear that there are some individuals who are willing to disobey the order of the court and trespass on land in breach of the injunction. There are also other parts of the Harvil Road Site (which are now covered by the injunction but were not before the June 2020 Order) on which encampments have been formed and which have been subject to various incidences of trespass. The Claimants have therefore required the support of the HCE Group and the NET to remove and / or prevent protesters from trespassing on and / or obstructing the Harvil Road Site.
- (e) The NET has been engaged at the Harvil Road Site in a number of capacities:
  - (i) to enforce High Court Writs (ii) to enforce statutory warrants issued by the Claimants pursuant to statutory powers under the High Speed Rail (London - West Midlands) Act 2017 (the “**2017 Act**”) and section 13 of the Compulsory Purchase Act 1965 (for example, in relation to (i) and (ii) the enforcement of the 2019 Possession Order and the execution of the statutory warrants referred to at paragraphs 25 to 29 of Jordan 2), (iii) to recover land on behalf of the Claimants (albeit the NET is directly instructed by the Second Claimant’s security contractor in these instances) using the common law remedy of self-help using reasonable force and (iv) to secure the Harvil Road Site to prevent further incursions (again instructed by the Second Claimant’s security contractor).
- (f) During whichever operation is being undertaken, I am aware that the NET’s procedure (despite the allegations made by the protesters) is to explain on what basis and in what capacity they are acting and / or authorised to take the steps

they are taking. The enforcement officers are specifically trained to explain clearly the purpose for which they are present.

- (g) I exhibit to this statement at **pp. 43 – 48, p. 49 and p. 50** of **RJ10** footage taken by protesters (and extracted from the ‘Stop HS2’ website). The footage was shared by D3, Ms Green and D4, Mr Keir on their social media accounts. The video at **p. 50** shows an Authorised HCEO, Mr Asker explaining the basis of the enforcement action on that date (this was relating to the 2020 Enforcement Operation which took place in January). Mr Asker also explains the intention to recover the Land peacefully and that the health and safety of those involved is important. He also explains that the protesters are to depart, failing which they would be removed using no more than reasonable force if necessary.
- (h) It is clear from this footage that the conduct of the enforcement officers is not aggressive in nature and that evictions operations are attended by the police.
- (i) I also refer to the letter from the Claimants’ solicitors to solicitors said to be at that time acting on behalf of protesters at the Harvil Road which is mentioned at paragraph 45 of Mr Perin’s second witness statement and at **pp. 62-63** of **RP2**. This letter explains then the basis on which the officers recovered possession of parts of the land at Harvil Road as part of the 2020 Enforcement Operation. It also makes clear that this was explained to the protesters on the ground at the time the eviction was being undertaken. I have no doubt that, despite the assertions made by the protesters that the NET is acting unlawfully, that the protesters are aware that the NET is engaged in a number of capacities.
- (j) The reality is that often protesters shout or sing loudly over the officers on the ground such that they do not listen to (and have no intention of hearing) what is being explained to them or they simply choose not to believe the explanation.
- (k) In addition to the officers on the ground clearly explaining to the protesters the basis under which they are taking action, I understand that enforcement officers are identified as such by their black uniform with prominent logos on



their back and left chest which read “Enforcement Agent”. On enforcement operations where more than a small team (6+) of officers are deployed, the officers will, in addition wear armbands bearing a reporting number which is assigned to them for the duration of the operation, to enable ready identification of persons engaged when incidents occur or are subsequently reported to have occurred.

- (1) The Second Claimant works with the HCE Group because of its reputation, experience and professionalism. Each operation which has been undertaken by the HCE Group on the Harvil Road Site has been painstakingly planned with the Claimants’ security team including risk assessments, operation plans, a number of briefings and working closely with the police who are then usually present or at the very least informed and aware of any proposed operation of any significance. The allegations that NET has been acting unlawfully are denied.

8. Whilst Mr Keir has not particularised his allegations, I understand that there appears to be two specific operations which have attracted criticism of the NET (and therefore of the Claimants), one in relation to the eviction of a disused commercial garage known as Ryall’s Garage (which Ms Pitwell also refers to in her ‘Defence Statement’) and an eviction operation which took place between 15-18 June 2020 and which is referred to in more detail below. Whilst I do not understand the allegations made to be relevant to the Claimants’ application and the matters presently before the Court, I seek to reply very briefly to these two points in the event that the Court finds this helpful:

**8.1 Ryall’s Garage:** this was an eviction which took place under self-help common law powers on 12 and 13 May 2020 in relation to a squatted building, being an abandoned commercial building on what is now part of the Land covered by the June 2020 Injunction but formerly was not covered by injunctive relief:

- (i) As detailed at paragraph 29 of the first witness statement of Ms Jenkins, this eviction was subject to an urgent injunction before Mr Justice Swift in the Queen’s Bench Division on the morning of 13 May 2020 seeking to halt the eviction as unlawful. That application was dismissed (and a copy of the order

made at is at **pp. 101 – 102 of SRJ1**). I now exhibit the Approved Judgment and Transcript of the Hearing at **pp. 51 – 91 of RJ10**;

- (ii) It is not accepted that the eviction was unlawful or a breach of the provisions of the Criminal Law Act 1977. To the best of my knowledge, there is no investigation being undertaken by the police in relation to this allegation. The police were aware of this eviction operation, approved the eviction plan in advance and were regularly present on the site throughout the operation. To the extent there are any allegations by anyone of a crime being committed, the appropriate authority to intervene was involved at the relevant time.
- (iii) Save as to deny the allegations, in light of the unparticularised nature of the allegations, and so as to avoid prejudicing any criminal investigation that may be instigated at the complaint of those affected, I do not consider it appropriate to comment any further in relation to these assertions.

**8.2 The eviction operation 15-18 June 2020:** this was an eviction operation which took place following the Claimants having issued statutory warrants pursuant to their powers under the 2017 Act and section 13 of the Compulsory Purchase Act 1965. The NET executed those warrants lawfully as:

- (i) The statutory process authorises the Claimants to issue warrants where unauthorised occupiers refuse to give up possession of land which is subject to those statutory regimes and land to which they are entitled to possession of. For the avoidance of doubt, a court order is not required;
- (ii) The eviction related to land which had been vested in the First Claimant by way of a general vesting declaration and land over which the Second Claimant was entitled to temporarily possession of pursuant to section 15 and Schedule 16 of the 2017 Act;
- (iii) The Claimants together were entitled to possession of the land but were hindered from taking possession of it due to unauthorised trespass; and

- (iv) Statutory warrants were therefore issued to direct an Authorised High Court Enforcement Officer to obtain and deliver possession of the land to the Claimants.

9. Mr Keir highlights in his statement that only one protester has been convicted of an offence despite there being over 200 arrests. The number of convictions is, in fact, two (one of those being a conviction against D10, Mr Cuciurean). Whilst I accept that the conviction rate is low, that does not in my view demonstrate that the complaints about conduct which the injunction seeks to restrain has not been committed. At the very least, there has been conduct to a sufficient extent that a police officer has seen fit to arrest the protestor. The fact that a criminal offence might not ultimately be proved at trial beyond all reasonable doubt could be for any number of reasons, not necessarily because conduct which might have been a civil wrong had not taken place. The reasons why prosecutions have not been pursued or the conviction rate is low include:

- (i) the Crown Prosecution Service (“**the CPS**”) often does not consider it to be in the public interest to pursue prosecutions. I understand that to be largely because the offences relate to private land and it is often considered that the landowner can take necessary action;
- (ii) Additionally offences of aggravated trespass, for example, require the CPS to prove a number of elements including that the trespass prevented or obstructed lawful activity (i.e. the Second Claimant’s - or its contractor’s - works). It is not always possible given the size of the project and the number of different contractors working together to quickly provide the CPS with the information that would help support a conviction (which would include consents for the works being disrupted for example to evidence of the lawfulness of the activity);
- (iii) A technical argument might be raised in relation to the boundary of the land upon which the alleged offence was committed, for example, which the CPS do not have the detail to rebut at the trial.

10. There are currently a significant number of prosecutions being pursued in relation to protest activity at HS2 sites along the route, including but not limited to the following:
- (i) Proceedings against 22 individual protesters as a result of unlawful activity at a HS2 site in Warwickshire. I understand a case management hearing was heard on 16 July 2020 and a court date in October has been set;
  - (ii) The trial of D15, Mr Ruggles and Mr James Brown is due to heard on 27 July 2020 in relation to the incident referred to at paragraph 48 of Jordan 2. I understand Mr Ruggles is also due in court in relation to another incident at the HS2 site in Warwickshire in September;
  - (iii) I understand D22, Mr Maxey is due to appear in court on 29 July 2020 for the incident referred to at paragraph 99 of Jordan 2. Mr Maxey was also one of the 22 individuals in court on 16 July 2020 as referred to above; and
  - (iv) the proceedings against Ms Pitwell as referred to above.

#### **D28 – Hayley Pitwell**

11. Ms Pitwell, like Mr Keir, raises concerns in relation to the NET. I believe that I have addressed Ms Pitwell's concerns in relation to that above in addition to the assertions she makes about the eviction of the Ryall's Garage.
12. In relation to her trespass at Ryall's Garage, I note that Ms Pitwell does not deny that she was on that land but rather believes she had permission from the occupier (presumably another trespasser). She mistakenly believes this means that her occupation of that land did not amount to a trespass.
13. Whilst I note Ms Pitwell denies the allegation of assault against her at paragraph 93 of Jordan 2, she does accept that criminal proceedings are ongoing for which I understand there is a court appearance listed for 27 July 2020. I also understand she was required to attend court for a case management hearing alongside 21 other individuals in relation to incidents taking place at another HS2 site in Warwickshire

on 16 July 2020. In any event, I note that Ms Pitwell does not deny the allegation of trespass.

### **Protester Activity Since 31 May 2020**

14. In Jordan 2 I described in detail the number and type of incidents which the Claimants' and their contractors have experienced at the Harvil Road Site. Jordan 2 was up to date as at 31 May 2020. I had to draw a line at that date, because it was proving to be very difficult to finalise a statement which tried to be precisely up to date – that is because there are incidents and developments at the site almost every day.
15. Since 31 May 2020 and since the Substantive Amendment Application (and indeed the Extension Application before it) has been issued, protester activity at the Harvil Road Site has not diminished. I do not propose to recount or detail every single incident which has taken place since 31 May 2020 because that would not be proportionate, however I set out below a summary to illustrate that the threat of trespass continues such that the Land continues to be at risk should the injunction not be continued.
16. On **11 June 2020** at c.9:00, it was reported that a low loader delivery lorry attempting to bring steel casings onto the Harvil Road Site via West Gate 3 was delayed as four protesters including Mr Oliver (D9) attempted to place themselves beneath the wheels of the tractor unit to prevent the vehicle moving forward. This not only delayed and disrupted equipment being delivered to the Site but temporarily blocked Harvil Road causing a nuisance to other road users. It was reported that the protesters eventually moved when a member of the public who was trying to pass through the road (and who was apparently trying to get to the hospital) threatened to move them himself if they did not voluntarily depart.
17. Trespass on the Claimants' land continues (as it does on adjoining land). I have referred to the eviction operation which took place between 15-18 June 2020 pursuant to statutory warrants above to remove unlawful occupiers from part of the Additional Land (near HOAC) and other land which has now become part of the Harvil Road Site. I exhibit at **pp. 92 – 100 of RJ10**, an overview document from NET from that eviction operation which contains photographs of the extent of the

trespass and documents some of resistance measures put in place by the protesters to prevent and / or make difficult their removal.

18. That operation was carefully planned and commenced early morning on 15 June 2020. As a result of the sudden arrival by the NET, all persons left the site without significant resistance, except for the following:
  - (i) Scott Breen (D13) and another unidentified individual who remained resisting removal underground in a tunnel that he and others had constructed: Mr Breen was removed by the NET confined space team on the third day of the operation;
  - (ii) A male known as Charlie Ingram who was removed from a storm drain by the confined space team on the first day (and was reported to have been subsequently hospitalised due to being in contact with sewage for a lengthy period);
  - (iii) Three other persons in trees who had to be removed by the NET climbing team.
19. Some of the protesters who were removed from the “HOAC camp” following the above operation have subsequently set up a large camp at Denham Country Park adjacent to the HS2 Babcock compound (indeed, hard against the compound fence) which is on plot C111\_008. This camp is very active and has been the source of almost daily (and nightly) attempts to breach the compound fence, some successful, which have resulted in damage to the fence and the arrest of individuals, including Charlie Ingram and Jack Charles Oliver (D34), who are well known to the NET. Several tree-houses have been built including some over the compound itself, from which it has been necessary to remove persons using the NET climbing team.
20. The threat from the protesters continues such that the Land and any land brought into the Scheme is at risk. As is clear from a video report by BBC News on 22 July 2020, a transcript of which is at **pp. 101 – 102 of RJ10**, the protesters have every desire to prevent and disrupt the activities of the Second Claimant and its contractors. D22,

Mr Maxey, is interviewed in that report in the area of the Denham Country Park, an extract of which is set out below for ease of reference:

Larch Maxey	"We have already been evicted from this site once and we've come back stronger and better than ever and that's what we keep doing. Every time HS2 try and break the law, try and break the rules, try and break our spirits, we come back stronger and..."
Talia Woodin	"But isn't it you breaking the rules, breaking the law? The law is on their side now isn't it?"
Larch Maxey	"...I'm taking non-violent principled civil disobedience along with hundreds and increasingly thousands of others."

#### 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: .....

Richard Joseph Jordan

Date: 27 July 2020