

- 1) Made on behalf of the Claimants
- 2) RCK Allen
- 3) Fifth Witness Statement
- 4) Exhibit RCKA5
- 5) Dated 4 December 2025

**CLAIM NO: M10SE015**

**IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION  
IN THE SHEFFIELD DISTRICT REGISTRY**

**BETWEEN**

**(1) SHEFFIELD ENVIRONMENTAL SERVICES LIMITED**

**(2) VEOLIA ES SHEFFIELD LIMITED**

**(3) VEOLIA ES (UK) LIMITED**

**Claimants**

and

**PERSONS UNKNOWN**

**Defendants**

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**EXHIBIT RCKA5**

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This is the Exhibit marked as RCKA5 referred to in the Fifth Witness Statement of Robert Charles Kinkead Allen dated 4 December 2025.

<b>TAB</b>	<b>DOCUMENT</b>	<b>DATE</b>	<b>PAGES</b>
1.	Email from Simmons & Simmons to Thompsons Solicitors	2 December 2025	3-4
2.	Screenshot of Veolia Website as at 15:25 on 2 December 2025	2 December 2025	5
3.	Email from Simmons & Simmons to Thompsons Solicitors	3 December 2025	6
4.	Screenshot of Veolia Website as at 09:22 on 4 December 2025	4 December 2025	7
5.	Notice to Affix at Sites	18 November 2025	8

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**From:** Claire Rhodes  
**Sent:** 02 December 2025 12:11  
**To:** neiltodd@thompsons.law  
**Cc:** veoliainjunction  
**Subject:** RE: Claim No: M10SE015: (1) Sheffield Environmental Services Limited, (2) Veolia ES Sheffield Limited, and (3) Veolia ES (UK) Limited v Persons Unknown [SIMS-L\_LIVE\_EMEA2.003165.003165-00032.FID2494481]

Dear all

**Claim No: M10SE015: (1) Sheffield Environmental Services Limited, (2) Veolia ES Sheffield Limited, and (3) Veolia ES (UK) Limited v Persons Unknown**

We continue to act for the Claimants in the above-named matter.

Further to the injunction extension hearing listed to take place at 10am on 5 December 2025 before HHJ Baddeley, please find electronic copies of supporting bundles, witness statements and exhibits enclosed by way of the following secure link, as requested by HHJ Baddeley: <https://simmons-simmons.sharefile.eu/public/share/web-s3603fb4a114242469619628f01380bb9>

Please note that the exhibits to the First and Second Witness Statements of Elizabeth Johnson (Exhibit EJ1 and EJ2), the First Witness Statement of Dean Anthony Ford (Exhibit DAF1), and the First Witness Statement of Sophie Joy Garraty (Exhibit SJG1) all contain video evidence. The PDF copies of these exhibits contain slipsheets for the video evidence, and the video evidence itself is contained in a zipped folder accessible via the secure link above. USB drives containing the video exhibits will also be provided at the hearing to facilitate their viewing.

Yours faithfully

**Simmons & Simmons LLP**

Claire Rhodes  
Associate, Disputes & Investigations  
Simmons & Simmons LLP  
T +44 7890 953017  
[claire.rhodes@simmons-simmons.com](mailto:claire.rhodes@simmons-simmons.com)

*We value feedback, please share your views via our [quick survey](#).*

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**From:** Hannah Barton  
**Sent:** 18 November 2025 16:29  
**To:** Neil Todd (Thompsons Solicitors) <[neiltodd@thompsons.law](mailto:neiltodd@thompsons.law)>  
**Cc:** veoliainjunction <[veoliainjunction@simmons-simmons.com](mailto:veoliainjunction@simmons-simmons.com)>  
**Subject:** Claim No: M10SE015: (1) Sheffield Environmental Services Limited, (2) Veolia ES Sheffield Limited, and (3) Veolia ES (UK) Limited v Persons Unknown [SIMS-L\_LIVE\_EMEA2.003165.003165-00032.FID2494481]

Dear all,

**Claim No: M10SE015: (1) Sheffield Environmental Services Limited, (2) Veolia ES Sheffield Limited, and (3) Veolia ES (UK) Limited v Persons Unknown**

As you are aware, we act for the Claimants in the above-named matter. Further to the order of Mrs Justice Stacey dated 13 June 2025 (the “**Order**”) by which the Claimants were granted an injunction in relation to various of the Claimants’ sites in Sheffield (the “**Injunction**”), the Claimants have brought an application in the High Court seeking an extension of the Injunction (currently due to expire on 13 December 2025) until 13 June 2026 (the “**Extension Application**”).

By way of notification pursuant to paragraph 10 of the Order, please see attached and enclosed by way of an SFTP link the following documents in relation to the Extension Application. The password will be provided under separate cover:

1. Sealed Application Notice
2. Draft Order
3. First Witness Statement of Dean Anthony Ford
4. Exhibit DAF1
5. Exhibit DAF1 – Video Evidence
6. First Witness Statement of Sophie Joy Garraty
7. Exhibit SJG1
8. Exhibit SJG1 – Video Evidence
9. Second Witness Statement of Donald John Fraser Macphail
10. Exhibit DM2
11. Third Witness Statement of Robert Allen
12. Exhibit RCKA3

Documents 3 to 12 can be downloaded from the following link: <https://simmons-simmons.sharefile.eu/d-s8a1c6cfc111748ab94d009426ab6074a>

By way of notification pursuant to paragraph 11 of the Order, please see attached a copy of the Hearing Notice.

The hearing is listed to take place on 5 December 2025 at 10:00 am before His Honour Judge Baddeley at Sheffield District Registry, The Law Courts, 50 West Bar, Sheffield, S3 8PH.

Yours faithfully

**Simmons & Simmons LLP**

**Hannah Barton**

Supervising Associate, Disputes & Investigations  
Solicitor Advocate (Higher Rights Civil)  
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# Veolia Sheffield Injunction

At a hearing on 13 June 2025, the High Court granted us an injunction until 13 December 2025 (or final determination of the claim or further order) to prohibit anyone from entering, occupying or remaining on, or blocking or obstructing the entering or exiting of any other individual or vehicle to or from Veolia's land (as shown edged in red on the Plans in Schedule 1 of the Injunction Order) in support of strikes organised by Unite the Union and without Veolia's consent (the "Injunction").

Anyone breaching the Injunction might be imprisoned for up to 2 years, fined and/or have their assets seized for contempt of court.

Judgment in this matter was handed down on 13 August 2025.

Following the transfer of the claim to the Sheffield District Registry, the proceedings have been assigned Claim No. M10SE015 (previously Claim No. KB-2025-LDS-000078).

We have brought an application in the High Court seeking an extension of the injunction (currently due to expire on 13 December 2025) until 13 June 2026 (the "Injunction Extension Application").

The hearing of the Injunction Extension Application has been listed to be heard before His Honour Judge Baddeley at 10:00 am on 5 December 2025 at Sheffield District Registry, The Law Courts, 50 West Bar, Sheffield, S3 8PH.

## Documents relating to the Injunction Extension Application and the hearing on 5 December 2025

Documents relating to the Injunction Extension Application and the hearing on 5 December 2025 can be obtained using the links below.

*Due to file size restrictions, some of the video exhibits for SJG1 (SJG1-15 and SJG1-17) and DAF1 (DAF1-14 and DAF1-27) and EB (EB/969, EB/993 and EB/995) are not currently available for download on this page. These documents are available upon request by emailing [veoliainjunction@simmons-simmons.com](mailto:veoliainjunction@simmons-simmons.com).*

### Injunction Extension Application

1. [Hearing Notice](#) ( PDF - 88.45 KB )
2. [Sealed Application Notice](#) ( PDF - 139.99 KB )
3. [Draft Order](#) ( DOCX - 4.43 MB )
4. [First Witness Statement of Dean Anthony Ford](#) ( PDF - 1.38 MB )
5. [Exhibit DAF1](#) ( PDF - 13.3 MB )
6. [Exhibit DAF1 - Video Evidence \(1\)](#) ( ZIP - 158.36 MB )
7. [Exhibit DAF1 - Video Evidence \(2\)](#) ( ZIP - 113.17 MB )
8. [First Witness Statement of Sophie Joy Garraty](#) ( PDF - 699.76 KB )
9. [Exhibit SJG1](#) ( PDF - 13.35 MB )
10. [Exhibit SJG1 - Video Evidence](#) ( ZIP - 74.32 MB )
11. [Second Witness Statement of Donald John Fraser Macphail](#) ( PDF - 74.77 KB )
12. [Exhibit DM2](#) ( PDF - 7.9 MB )
13. [Third Witness Statement of Robert Allen](#) ( PDF - 195.21 KB )
14. [Exhibit RCKA3](#) ( PDF - 16.13 MB )
15. [Core Bundle](#) ( PDF - 15.88 MB )
16. [Exhibit Bundle](#) ( PDF - 109.71 MB )
17. [Exhibit Bundle - Video Evidence \(1\)](#) ( ZIP - 224.02 MB )
18. [Exhibit Bundle - Video Evidence \(2\)](#) ( ZIP - 186.34 MB )
19. [Exhibit Bundle - Video Evidence \(3\)](#) ( ZIP - 231.65 MB )
20. [Exhibit Bundle - Video Evidence \(4\)](#) ( ZIP - 206.99 MB )
21. [Exhibit Bundle - Video Evidence \(5\)](#) ( ZIP - 152.77 MB )
22. [Exhibit Bundle - Video Evidence \(6\)](#) ( ZIP - 231.73 MB )
23. [Exhibit Bundle - Video Evidence \(7\)](#) ( ZIP - 121.62 MB )
24. [Exhibit Bundle - Video Evidence \(8\)](#) ( ZIP - 74.4 MB )
25. [Supplementary Bundle](#) ( PDF - 8.04 MB )

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**From:** Hannah Barton  
**Sent:** 03 December 2025 19:23  
**To:** 'Neil Todd (Thompsons Solicitors)'  
**Cc:** veoliainjunction  
**Subject:** Claim No: M10SE015: (1) Sheffield Environmental Services Limited, (2) Veolia ES Sheffield Limited, and (3) Veolia ES (UK) Limited v Persons Unknown [SIMS-L\_LIVE\_EMEA2.003165.003165-00032.FID2494481]  
**Attachments:** Veolia v PU - Cs skeleton argument for hearing on 05-12-25(106835163.1).pdf; Veolia v PU - Cs Chronology 05-12-2025(106835162.1).pdf; Veolia v PU - AuthBundle 05-12-2025(106835015.2).pdf

Dear all

**Claim No: M10SE015: (1) Sheffield Environmental Services Limited, (2) Veolia ES Sheffield Limited, and (3) Veolia ES (UK) Limited v Persons Unknown**

We refer to our previous correspondence and adopt the terms as previously defined.

We refer to the hearing of the Extension Application which has been listed for 3 hours from 10am on Friday 5 December 2025 before Honour Judge Baddeley at the Sheffield District Registry, the Law Courts, 50 West Bar, Sheffield S3 8PH (the "**Hearing**").

Pursuant to paragraph 11 of the order of Mrs Justice Stacey dated 13 June 2025, please see attached, by way of notification, copies of the following documents for the Hearing:

- The Claimants' skeleton argument;
- The Claimants' chronology; and
- The Claimants' bundle of authorities.

Yours faithfully

**Simmons & Simmons LLP**

# Veolia Sheffield Injunction

At a hearing on 13 June 2025, the High Court granted us an injunction until 13 December 2025 (or final determination of the claim or further order) to prohibit anyone from entering, occupying or remaining on, or blocking or obstructing the entering or exiting of any other individual or vehicle to or from Veolia's land (as shown edged in red on the Plans in Schedule 1 of the Injunction Order) in support of strikes organised by Unite the Union and without Veolia's consent (the "Injunction").

Anyone breaching the Injunction might be imprisoned for up to 2 years, fined and/or have their assets seized for contempt of court.

Judgment in this matter was handed down on 13 August 2025.

Following the transfer of the claim to the Sheffield District Registry, the proceedings have been assigned Claim No. M10SE015 (previously Claim No. KB-2025-LDS-000078)

We have brought an application in the High Court seeking an extension of the injunction (currently due to expire on 13 December 2025) until 13 June 2026 (the "Injunction Extension Application").

The hearing of the Injunction Extension Application has been listed to be heard before His Honour Judge Baddeley at 10:00 am on 5 December 2025 at Sheffield District Registry, The Law Courts, 50 West Bar, Sheffield, S3 8PH.

## Documents relating to the Injunction Extension Application and the hearing on 5 December 2025

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### Injunction Extension Application

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24. [Exhibit Bundle - Video Evidence \(8\)](#) ( ZIP - 74.4 MB )
25. [Supplementary Bundle](#) ( PDF - 8.04 MB )
26. [Claimants' Skeleton Argument](#) ( PDF - 334.81 KB )
27. [Claimants' Chronology](#) ( PDF - 144 KB )
28. [Claimants' Authority Bundle](#) ( PDF - 6.53 MB )

**In the High Court, King's Bench Division, Sheffield District Registry**  
**Claim No: M10SE015**

Claimants: (1) Sheffield Environmental Services Ltd (2) Veolia ES Sheffield Ltd  
(3) Veolia ES (UK) Ltd

Defendants: Persons Unknown who, in support of strikes organised by Unite the Union and without the Claimants' consent, enter occupy or remain on, or block or obstruct the entering or exiting of any other individual or vehicle to or from this site.

Please take notice that the Claimants have brought an application in the High Court seeking an extension of the injunction (currently due to expire on 13 December 2025) until 13 June 2026, which would prevent the Defendants from, without the Claimants' consent:

- Entering, occupying or remaining on this site; and,
- Block or obstruct the exiting or entering of any other individual or vehicle to or from this site.

All of the Court documents can be found at the following website:  
<https://www.sheffield.veolia.co.uk/>.

The Court documents can be obtained in hard copy from Lumley Street Depot, Sheffield, S4 7ZJ.

The application for the extension of the injunction will be heard on 5 December 2025 at 10:00 AM before His Honour Judge Baddeley at Sheffield District Registry, The Law Courts, 50 West Bar, Sheffield, S3 8PH. Once confirmed, further information on the precise date and time of the hearing will be provided at the link above as well as at this location.