

- 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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**FIFTH WITNESS STATEMENT OF ROBERT CHARLES  
KINKEAD ALLEN**

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I, Robert Charles Kinkead Allen of Simmons & Simmons LLP, CityPoint, 1 Ropemaker St, London EC2Y 9SS will say as follows:-

1. I am a solicitor of the Senior Courts of England and Wales and a Partner at Simmons & Simmons LLP ("S&S"). I am duly authorised by Sheffield Environmental Services Limited, Veolia ES Sheffield Limited and Veolia ES (UK) Limited (the "Claimants") to make this witness statement on behalf of the Claimants in support of their application for an extension to the injunction (the "Injunction Extension Application") against Persons Unknown (the "Defendants") which was granted by order of Mrs Justice Stacey on 13 June 2025 (the "Injunction Order"). This is my fifth witness statement in these proceedings and I adopt the terms as defined in my previous statements.
2. I give this witness statement for the purpose of recording the steps taken to notify the Defendants of the documents filed at Court in advance of the hearing of the Claimants' Injunction Extension Application on 5 December 2025 and to correct an error in the Second Witness Statement of Sophie Joy Garraty dated 1 December 2025 ("Garraty 2") and the Exhibit SJG2.
3. The facts and matters to which I refer in this witness statement are true to the best of my knowledge, information and belief. Where I rely upon others or documents as the source of my knowledge, I set out the source of that information, which is also true to the best of my knowledge, information and belief.
4. In making this witness statement I do not intend to waive privilege in any respect and am not authorised by the Claimants to do so.
5. I exhibit to this statement a paginated bundle of documents marked "**RCKA5**" to which I refer in this statement. References in this statement in the form [**RCKA5/[•]**] are to pages of Exhibit RCKA5.
6. In accordance with paragraphs 10 to 12 of the Injunction Order, the Claimants notified the Defendants of the core bundle of documents (the "Core Bundle"), the bundle of exhibits including video evidence (the "Exhibits Bundle"), and the supplementary bundle of documents containing my fourth witness statement dated 1 December 2025 ("Allen 4") and Exhibit

RCKA4 and Garraty 2 and Exhibit SJG2 (the “Supplementary Bundle”). Notification was affected as follows:

- (A) At 12:11 pm on 2 December 2025, S&S sent an email to [neiltodd@thompsons.law](mailto:neiltodd@thompsons.law) (copied to me via the email address [veoliainjunction@simmons-simmons.com](mailto:veoliainjunction@simmons-simmons.com)) enclosing copies of the Core Bundle, Exhibits Bundle (including a zipped folder of the video evidence), and the Supplementary Bundle via a secure file transfer link **[RCKA5/3]**.
- (B) At 15:24 pm on 2 December 2025, Ms Ruth Alexander, Lead Education, Communications and Outreach Officer for Treatment East at Veolia confirmed in an email sent to S&S (which I have seen), that the Core Bundle, Exhibits Bundle (including zipped folders containing the video evidence) and the Supplementary Bundle had been uploaded to the Website (<https://www.sheffield.veolia.co.uk>). I exhibit a screenshot of the Website taken at 15:25 pm on 2 December 2025 **[RCKA5/5]**. I note that due to file size restrictions, exhibits EB/969, EB/993, and EB/995 were not able to be uploaded to the Website and a notice is contained on the Website directing individuals to request copies of these directly from [veoliainjunction@simmons-simmons.com](mailto:veoliainjunction@simmons-simmons.com).

7. In accordance with paragraphs 10 to 12 of the Injunction Order, the Claimants notified the Defendants of the Claimants’ skeleton argument, chronology, and bundle of authorities as follows:

- (A) At 19:23 pm on 3 December 2025, S&S sent an email to [neiltodd@thompsons.law](mailto:neiltodd@thompsons.law) (copied to me via the email address [veoliainjunction@simmons-simmons.com](mailto:veoliainjunction@simmons-simmons.com)) attaching copies of the Claimants’ skeleton argument, chronology, and bundle of authorities **[RCKA5/6]**.
- (B) At 08:59 am on 4 December 2025, Ms Alexander confirmed in an email sent to S&S (which I have seen) that the Claimants’ skeleton

argument, chronology and bundle of authorities had been uploaded to the Website. I exhibit a screenshot of the Website taken at 09:22 am on 4 December 2025 [RCKA5/7].

8. I refer to the Notice to Affix at Sites as defined in paragraph 16 of Garraty 2 and exhibited at page 17 of Exhibit SJG2 (contained at page 32 of the Supplementary Bundle). It has been drawn to my attention that the wrong document was exhibited to Garraty 2 and I include a copy of the correct Notice to Affix at Sites in my exhibit, which was the copy that S&S sent to the Claimants on 18 November 2025 to put up at the locations marked 'X' on Plans 1 to 5 of the Injunction Order [RCKA5/8].
9. A copy of this witness statement and Exhibit RCKA5 will be sent by email to [neiltodd@thompsons.law](mailto:neiltodd@thompsons.law) and uploaded to the Website.
10. I understand the duty of full and frank disclosure and I have sought to comply with the duty in the preparation of this statement.

Signed



Full name

Robert Charles Kinkead Allen

Position or Office held

Partner at Simmons & Simmons LLP

Dated

4 December 2025