

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

CLAIM NO. M10SE015

BETWEEN

(1) SHEFFIELD ENVIRONMENTAL SERVICES LIMITED

(2) VEOLIA ES SHEFFIELD LIMITED

(3) VEOLIA ES (UK) LIMITED

Claimants

and

PERSONS UNKNOWN

Defendants

---

**SUPPLEMENTARY HEARING BUNDLE INDEX FOR HEARING OF  
THE EXTENSION APPLICATION ON 5 DECEMBER 2025 FROM 10  
AM**

---

TAB	DOCUMENT	DATE	PAGES
1.	Second Witness Statement of Sophie Joy Garraty	01 December 2025	4-15
2.	Exhibit SJG2	01 December 2025	16-62
	Fifth Inspection Monitoring Checklist	7 November 2025	19
	Fifth Inspection Monitoring Photographs	7 November 2025	20-31
	Notice to Affix at Sites	5 June 2025	32
	Workshop Entrance – Sealed Application Notice and Notice to Affix at Sites	20 November 2025	33
	Workshop Entrance – Hearing Notice	28 November 2025	34
	Workshop Exit – Sealed Application Notice and Notice to Affix at Sites	20 November 2025	35
	Workshop Exit – Hearing Notice	28 November 2025	36
	Lumley Street Depot – Sealed Application Notice and Notice to Affix at Sites	20 November 2025	37
	Lumley Street Depot – Hearing Notice	28 November 2025	38

TAB	DOCUMENT	DATE	PAGES
	ERF Entrance – Sealed Application Notice and Notice to Affix at Sites	20 November 2025	39
	ERF Entrance – Hearing Notice	28 November 2025	40
	ERF Exit – Sealed Application Notice and Notice to Affix at Sites and Hearing Notice	24 November 2025	41
	ERF Exit – Corrected Notice to Affix at Sites	1 December 2025	42
	Tinsley Park Road Entrance – Sealed Application Notice, Notice to Affix at Sites and Hearing Notice	21 November 2025	43
	Tinsley Park Road Exit – Sealed Application Notice, Notice to Affix at Sites and Hearing Notice	21 November 2025	44
	Beighton – Sealed Application Notice and Notice to Affix at Sites	20 November 2025	45
	Beighton – Hearing Notice	21 November 2025	46
	Screenshot of website as at 21 November 2025	21 November 2025	47
	Screenshot of website from 25 November 2025 onwards	25 November 2025	48-49
	Email correspondence between Sophie Garraty and David Wedlake, Plant Manager at Veolia's Leeds Site	4 November 2025	50-53
	Image 1: Screenshot of CCTV footage at the Leeds Site on 31 October 2025 at 10:59	31 October 2025	54
	Image 2: Screenshot of CCTV footage at the Leeds Site on 31 October 2025 at 10:48	31 October 2025	55
	Email correspondence between Sophie Garraty, Helen Johnson, Russell Flint and Jim Booth	4 November 2025	56-59
	Image 3: Mr Diviney at the Leeds Site	31 October 2025	60
	Image 4: Mr Diviney at the Leeds Site	31 October 2025	61
	Image 5: Mr Diviney at the Leeds Site	31 October 2025	62
3.	Fourth Witness Statement of Robert Charles Kinkead Allen	01 December 2025	63-68
4.	Exhibit RCKA4	01 December 2025	69-98
	Emails from S&S to Sheffield County Court regarding the filing of the Injunction Extension Application	22 October 2025 – 29 October 2025	71-76
	Email from Sheffield County Court to S&S regarding listing date <i>Attachments:</i> <ul style="list-style-type: none"> <li><i>Sealed Application Notice (sealed 22 November 2025); and</i></li> </ul>	18 November 2025	77-85

TAB	DOCUMENT	DATE	PAGES
	<ul style="list-style-type: none"> <li><i>Hearing Notice (dated 18 November 2025).</i></li> </ul>		
	Email from S&S to Thompsons attaching Hearing Notice, Sealed Application Notice, draft order and enclosing supporting witness evidence	18 November 2025	86
	Letter from S&S to Joseph Diviney <i>[Enclosures not included]</i>	29 September 2025	87-93
	Letter from S&S to Alistair Tice <i>[Enclosures not included]</i>	29 September 2025	94-98

- 1) Made on behalf of the Claimants  
2) SJ Garraty  
3) Second Witness Statement  
4) Exhibit SJG2  
5) Dated 1 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**

---

**SECOND WITNESS STATEMENT OF SOPHIE JOY GARRATY**

---

I, Sophie Joy Garraty of Veolia ES (UK) Limited, 210 Pentonville Road, London, N1 9JY, will say as follows:



## **SECTION A: INTRODUCTION**

1. I am the same Sophie Joy Garraty that has given a witness statement in these proceedings dated 22 October 2025 (“**Garraty 1**”). Unless stated otherwise, I use the same defined terms as included in Garraty 1.
2. I am duly authorised by the Claimants to make this witness statement on behalf of the Claimants in support of their application for the Injunction Extension Application.
3. I give this witness statement for the purpose of updating the Court since my last statement dated 22 October 2025.
4. 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.
5. This statement has been prepared for me by the solicitors for the Claimants, Simmons & Simmons LLP (“**S&S**”), through the exchange of emails and videoconferencing meetings between me and S&S. In making this statement I do not intend to waive privilege in any respect and I am not authorised by the Claimants to do so.
6. I exhibit to this statement a paginated bundle of documents marked “**SJG2**” to which I shall refer in the course of this statement. References in this statement in the form [**SJG2/[•]**] are to pages of Exhibit SJG2.
7. Schedule 2 of the Injunction Order sets out the undertakings given by the Claimants. In accordance with paragraph 3 of Schedule 2, on 13 June 2025, Ruth Alexander, Lead Education, Communications and Outreach Officer for Treatment East at Veolia, uploaded Allen 1 and Allen 2 (as defined in the Injunction Order) to the existing “Veolia Sheffield Injunction” webpage <https://www.sheffield.veolia.co.uk> (the “**Website**”). Ruth

Alexander confirmed that these had been uploaded in an email copied to me at 15:25 on 13 June 2025.

8. My statement is structured into the following sections (this introduction being Section A):
  - (A) Section B: Monitoring the Injunction;
  - (B) Section C: Notification of the Injunction Extension Application
  - (C) Section D: Update on the legal status of the pickets;
  - (D) Section E: Ongoing threats; and
  - (E) Section F: Duty of full and frank disclosure.

#### **SECTION B: MONITORING THE INJUNCTION**

9. I set out the monitoring of the Injunction Order and the Warning Notices at Section E of Garraty 1.
10. Since the Injunction Order was granted, monitoring is required to be undertaken in the first week of each month, as out below:
  - (A) From Tuesday 1 July 2025 to Monday 7 July 2025 ("**First Inspection**");
  - (B) From Friday 1 August 2025 to Thursday 7 August 2025 ("**Second Inspection**");
  - (C) From Monday 1 September 2025 to Sunday 7 September 2025 ("**Third Inspection**");
  - (D) From Wednesday 1 October 2025 to Wednesday 8 October 2025 ("**Fourth Inspection**");
  - (E) From Saturday 1 November 2025 to Friday 7 November 2025 ("**Fifth Inspection**"); and

- (F) From Monday 1 December 2025 to Sunday 7 December 2025.
11. I tasked the following individuals with carrying out the monitoring checks and completing a log of the checks:
- (A) **Lumley Street Depot and Lumley Street Workshop:** Simon Collins, Transport Manager at Veolia;
  - (B) **The ERF:** Matt Lee, Maintenance Manager at Veolia;
  - (C) **Tinsley Park Road:** Paul Hutchinson, Area Manager at Veolia; and
  - (D) **Beighton Site:** Graham Clark, MRF Manager at Veolia.
12. I set out a summary of First to the Fourth Inspections carried out at each of the sites at Section E of Garraty 1.
13. The Fifth Inspection was started on 3 November 2025 and the first round of checks was completed by 5 November 2025 and photographs of the checks were provided to me. I include the monitoring log for the Fifth Inspection **[SJG2/4]** and photographs in my exhibit **[SJG2/5-16]**.

### **SECTION C: NOTIFICATION OF THE INJUNCTION EXTENSION APPLICATION**

14. Paragraph 10 of the Injunction Order sets out the notification requirements for any further application and paragraph 11 of the Injunction Order sets out the notification requirements for any further documents. I understand that Mr Allen is providing a fourth witness statement ("**Allen 4**") in which he explains these notification requirements and addresses the notification requirements set out at paragraph 10(b) of the Injunction Order for Veolia's notification of the Injunction Extension Application. I have seen a draft of Allen 4 and I adopt the terms as defined in Allen 4.
15. I set out Veolia's compliance with the remaining notification requirements for the Injunction Extension Application pursuant to paragraph 10 of the

Injunction Order and the Hearing Notice pursuant to paragraph 11 of the Injunction Order below.

16. On 18 November 2025, S&S provided me with copies of the following:
  - (A) A notice to affix at the relevant sites stating that Injunction Extension Application had been made and where it can be accessed online (the “**Notice to Affix at Sites**”) [SJG2/17]; and
  - (B) A copy of the Sealed Application Notice.
17. In accordance with paragraph 10(c) of the Injunction Order, I made arrangements on 19 November 2025, for laminated copies of the Notice to Affix at Sites (and for completeness, a copy of the Sealed Application Notice) to be affixed at each of the locations marked “X” on Plans 1 to 5 of the Injunction Order. For the avoidance of doubt, the locations identified in paragraph 14 of Garraty 1 correspond to these locations. I tasked the following individuals with carrying out the notification requirements and completing a log to coordinate the exercise and to send me photographs once completed:
  - (A) **Lumley Street Depot and Lumley Street Workshop:** Nick O'Neill, Contract Manager at Veolia;
  - (B) **The ERF:** Matt Lee, Maintenance Manager at Veolia and Simon Collins, Transport manager at Veolia;
  - (C) **Tinsley Park Road:** Paul Hutchinson, Area Manager at Veolia; and
  - (D) **Beighton Site:** Graham Clark, MRF Manager at Veolia.,
18. I set out below a table of the relevant sites (in the rows), with the date that I can confirm that the relevant document was affixed at the relevant site (in the columns), and with references to the photographs of the affixed documents that I was provided with that are contained in my exhibit.

<b>Relevant Site</b>	<b>Notice to Affix at Sites</b>	<b>Sealed Application Notice</b>
Workshop Entrance	20 November 2025 <b>[SJG2/18]</b>	20 November 2025 <b>[SJG2/18]</b>
Workshop Exit	20 November 2025 <b>[SJG2/20]</b>	20 November 2025 <b>[SJG2/20]</b>
Lumley Street Depot	20 November 2025 <b>[SJG2/22]</b>	20 November 2025 <b>[SJG2/22]</b>
ERF Entrance	20 November 2025 <b>[SJG2/24]</b>	20 November 2025 <b>[SJG2/24]</b>
ERF Exit	24 November 2025 <b>[SJG2/26]</b> (inadvertently removed on 28 November 2025 and replaced on 1 December 2025 <b>[SJG2/27]</b> )	24 November 2025 <b>[SJG2/26]</b>
Tinsley Park Road Entrance	21 November 2025 <b>[SJG2/28]</b>	21 November 2025 <b>[SJG2/28]</b>
Tinsley Park Road Exit	21 November 2025 <b>[SJG2/29]</b>	21 November 2025 <b>[SJG2/29]</b>
Beighton	20 November 2025 <b>[SJG2/30]</b>	20 November 2025 <b>[SJG2/30]</b>

19. On 24 November 2025, I was provided with a photograph showing the ERF Exit with the Notice to Affix at Sites, the Sealed Application Notice and the

Hearing Notice (referred to in paragraph 22 below) all affixed at the site. On 28 November 2025, I was provided with another photograph showing the ERF Exit with the Notice to Affix at Sites having been replaced with a second copy of the Hearing Notice. On 28 November 2025, I instructed the team at the ERF to re-affix the Notice to Affix at Sites. It was confirmed to me on 1 December 2025 at 09:21 by Uzbaig Barlas, Operations Manager at Veolia, that this had been done and I include a photograph confirming the same in my exhibit **[SJG2/27]**. I apologise to the court on behalf of the Claimants for the error.

20. In addition to the above, on 18 November 2025, Ruth Alexander attempted to upload copies of the Injunction Extension Application Documents (as defined in paragraph 9(A) of Allen 4) to the Website. However, I understand that there was an issue with uploading the zipped folders of the video evidence in Exhibits SG1 and DAF1 because the Website only accepted files up to a maximum of 256 MB in size and each zipped folder exceeded that limit. As a result, on 20 November 2025, Ms Alexander uploaded copies of the Injunction Extension Application Documents (with the exception of the video evidence) and the Hearing Notice to the Website. Ms Alexander added a statement to the Website explaining that the video evidence was not available to download due to file size restrictions, but that copies could be obtained upon request by emailing [veoliainjunction@simmons-simmons.com](mailto:veoliainjunction@simmons-simmons.com) **[SJG2/32]**. Ms Alexander confirmed that this had been completed via an email copied to me at 17:21 on 20 November 2025.
21. On 25 November 2025, the video evidence in Exhibits DAF1 and SJG1 was sub-divided into smaller zipped folders and uploaded to the Website. In place of the individual video files that exceeded 256 MB, PDF slip sheets were uploaded containing instructions on how to access the relevant material by email to [veoliainjunction@simmons-simmons.com](mailto:veoliainjunction@simmons-simmons.com). The statement on the Website was also updated to say:

*“Due to file size restrictions, some of the video exhibits for SJG1 (SJG1-15 and SJG1-17) and DAF1 (DAF1-14 and DAF1-27) 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)." [SJG2/32-34]

Ms Alexander confirmed that this had been completed via email copied to me at 11:45 on 25 November 2025.

22. Although not required by the Injunction Order, for completeness, a copy of the Hearing Notice was affixed at each of the locations marked "X" on Plans 1 to 5 of the Injunction Order. I set out below a table of the relevant sites (in the rows), with the date that I can confirm that the relevant document was affixed at the relevant site (in the columns), and references to an image of the document as at the relevant date contained in my exhibit.

Relevant Site	Hearing Notice
Workshop Entrance	28 November 2025 [SJG2/19]
Workshop Exit	28 November 2025 [SJG2/21]
Lumley Street Depot	28 November 2025 [SJG2/23]
ERF Entrance	28 November 2025 [SJG2/24]
ERF Exit	24 November 2025 [SJG2/26]
Tinsley Park Road Entrance	21 November 2025 [SJG2/28]
Tinsley Park Road Exit	21 November 2025 [SJG2/29]
Beighton	21 November 2025 [SJG2/31]

#### **SECTION D: UPDATE ON THE LEGAL STATUS OF THE PICKETS**

23. I provided an update of the legal status of the pickets in Section F of Garraty 1. Since that time, Unite commenced discontinuous strike action on 10 November 2025, following notice provided in its letter dated 9 October

2025, with strikes occurring on a week-on, week-off basis. Unite continue to strike, with a consistent number of people, on Tuesdays, Wednesdays and Thursdays on the weeks they are on strike.

24. Veolia has implemented a plan in an attempt to minimise disruption to the operations, which includes a phased approach to reintegrating workers during non-strike weeks and accounting for accrued annual leave. This plan has been communicated to Unite, and Veolia continues to maintain dialogue with the union.
25. Dean Ford, Regional Director at Veolia, and I met with Chris Laming and Shane Sweeting at Unite on 4 November 2025. At that meeting Mr Sweeting confirmed that Unite considered that the parties, i.e. Veolia and Unite, were still in a dispute, and that Unite had no intention of returning to the workplace full time. I asked whether or not there would be a further ballot. Mr Sweeting confirmed that there would be. Unite has not yet confirmed whether that re-ballot has yet to take place, or if not, when it will take place.
26. There has been no further communications with the Trades Union Congress since the Injunction.

#### **SECTION E: ONGOING THREATS**

27. Since Garraty 1 there has been no further direct action at the Lumley Street Depot or any of the other Sheffield sites.
28. However, there has been direct action at another of Veolia's sites in Leeds. In this section I set out a narrative of the direct action (the "**Leeds Direct Action**") that took place at Veolia's Leeds site at New Market Approach, Leeds, LS9 0RJ (the "**Leeds Site**") on Friday 31 October 2025. I did not observe this as I was not present. However, David Wedlake, Plant Manager at the Leeds Site, observed the incident and confirmed the timings of the incidents to me in an email dated 4 November 2025, timed at 07:37 and 10:12 [SJG2/35-38] and I have reviewed CCTV footage of the incident.



29. The Leeds Site is a recycling and energy recovery facility that helps to increase recycling rates, generate heat and electrical energy, and significantly reduces the amount of waste the city sends to landfill.
30. Five masked individuals arrived at the Leeds Site at 10:20 AM and blocked the vehicle entrance at 10:21 AM. At least one of the masked individuals carried a sign which said “Union recognition now” appears to contain the “I support *The Sheffield Bin Strikers*” logo in which a parody of the Muppet character, Oscar the Grouch, appears to hold a sign which says “*Recognise Unite Now*”, as can be seen in the screenshot from the footage below [SJG2/39]. This same logo appeared on a leaflet handed out to the Claimants’ staff at the Bernard Road ERF site on 13 June 2025, as explained at paragraph 8 of Robert Allen’s second witness statement dated 13 June 2025.



**Image 1: Screenshot of CCTV footage at the Leeds Site on 31 October 2025 at 10:59 [SJG2/39]**

31. The masked individuals prevented four RCVs from entering the site by circling in front of the RCVs (an example of which can be seen in the below screenshot from CCTV footage at the Leeds Site). Another eight RCVs did not try to enter the site, and instead drove next door to the Leeds City Council RCV depot, which entrance was not blocked. I note that at

approximately 10:45 AM a contractor vehicle (a non-RCV vehicle) entered the site.



**Image 2: Screenshot of CCTV footage at the Leeds Site on 31 October 2025 at 10:48 [SJG2/40]**

32. The masked individuals blocked the entrance to the Leeds Site until 11:09 AM, and then left the site. The police were called but did not attend as David Wedlake at the Leeds Site stood them down once the masked individuals had left.
33. The effect of the Leeds Direct Action was that it disrupted and ultimately stopped operations at the Leeds Site for the duration of the direct action (approximately 50 minutes). The Leeds Site was unable to receive rubbish due to RCVs being blocked, and the RCVs could not unload and were forced to redirect to the Leeds City Council RCV depot next door. This caused a real nuisance to the Leeds site team on the day.
34. Having reviewed the video footage of the Leeds Direct Action, I believed that I recognised two individuals from the direct action at our sites in Sheffield: Mr Joseph Diviney and Mr Steve Carter. I asked the individuals who were present at the Leeds Site that day if they recognised either of these two individuals from the Leeds Direct Action. It was confirmed to me

by Helen Flint, Business Support Coordinator at the Leeds Site, that Joseph Diviney was one of the individuals engaging in direct action. Helen spoke to the masked individuals and observed the Leeds Direct Action. Helen's confirmation was supported by David Wedlake, Russell Flint, Contract Performance Manager at the Leeds Site, and by Jim Booth, Operations Manager at the Leeds Site [SJG2/41-44].

35. Mr Diviney was present at a protest at the Lumley Street Depot referred to in Section C of Garraty 1. Mr Diviney can be seen engaging in direct action at the Leeds Site in Images 3, 4 and 5 in my exhibit [SJG2/45-47].

#### **SECTION E: DUTY OF FULL AND FRANK DISCLOSURE**

36. S&S has informed me that full and frank disclosure is necessary for this application and throughout the process. I have aimed to comply with this duty in preparing this statement.

#### **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



Full name

Sophie Joy Garraty

Position or Office held

Senior Employee Relations Specialist

Dated

1 December 2025

- 1) Made on behalf of the Claimants
- 2) SJ Garraty
- 3) Second Witness Statement
- 4) Exhibit SJG2
- 5) Dated 1 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**

---

**EXHIBIT SJG2**

---

This is the Exhibit marked as SJG2 referred to in the Second Witness Statement of Sophie Joy Garraty dated 1 December 2025.

<b>TAB</b>	<b>DOCUMENT</b>	<b>DATE</b>	<b>PAGE</b>
1.	Fifth Inspection Monitoring Checklist	7 November 2025	4
2.	Fifth Inspection Monitoring Photographs	7 November 2025	5 - 16
3.	Notice to Affix at Sites	5 June 2025	17
4.	Workshop Entrance – Sealed Application Notice and Notice to Affix at Sites	20 November 2025	18
5.	Workshop Entrance – Hearing Notice	28 November 2025	19
6.	Workshop Exit – Sealed Application Notice and Notice to Affix at Sites	20 November 2025	20
7.	Workshop Exit – Hearing Notice	28 November 2025	21
8.	Lumley Street Depot – Sealed Application Notice and Notice to Affix at Sites	20 November 2025	22
9.	Lumley Street Depot – Hearing Notice	28 November 2025	23
10.	ERF Entrance – Sealed Application Notice and Notice to Affix at Sites	20 November 2025	24
11.	ERF Entrance – Hearing Notice	28 November 2025	25
12.	ERF Exit – Sealed Application Notice and Notice to Affix at Sites and Hearing Notice	24 November 2025	26
13.	ERF Exit – Corrected Notice to Affix at Sites	1 December 2025	27
14.	Tinsley Park Road Entrance – Sealed Application Notice, Notice to Affix at Sites and Hearing Notice	21 November 2025	28
15.	Tinsley Park Road Exit – Sealed Application Notice, Notice to Affix at Sites and Hearing Notice	21 November 2025	29

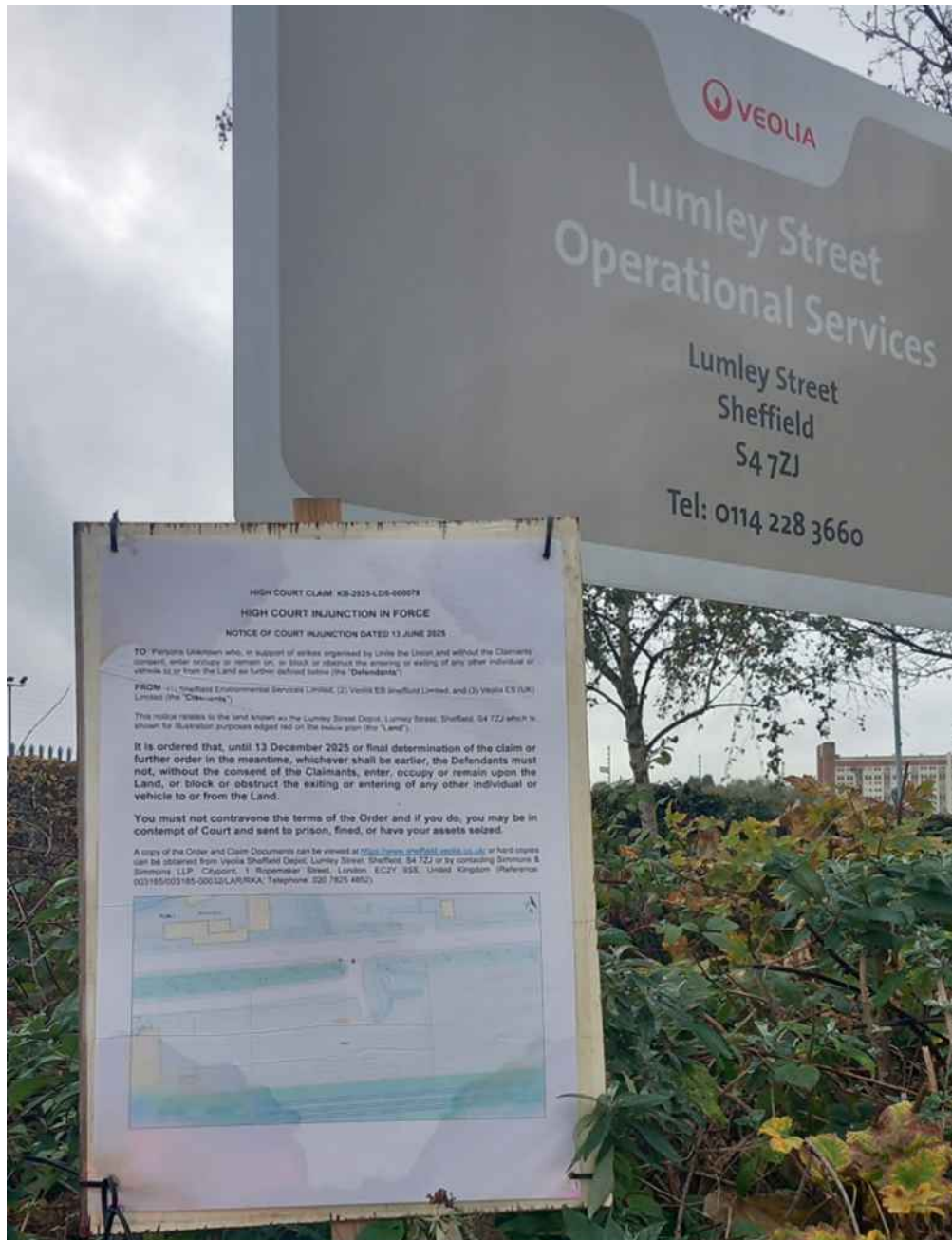
<b>TAB</b>	<b>DOCUMENT</b>	<b>DATE</b>	<b>PAGE</b>
16.	Beighton – Sealed Application Notice and Notice to Affix at Sites	20 November 2025	30
17.	Beighton – Hearing Notice	21 November 2025	31
18.	Screenshot of website as at 21 November 2025	21 November 2025	32
19.	Screenshot of website from 25 November 2025 onwards	25 November 2025	33 - 34
20.	Email correspondence between Sophie Garraty and David Wedlake, Plant Manager at Veolia's Leeds Site	4 November 2025	35 - 38
21.	Image 1: Screenshot of CCTV footage at the Leeds Site on 31 October 2025 at 10:59	31 October 2025	39
22.	Image 2: Screenshot of CCTV footage at the Leeds Site on 31 October 2025 at 10:48	31 October 2025	40
23.	Email correspondence between Sophie Garraty, Helen Johnson, Russell Flint and Jim Booth	4 November 2025	41 - 44
24.	Image 3: Mr Diviney at the Leeds Site	31 October 2025	45
25.	Image 4: Mr Diviney at the Leeds Site	31 October 2025	46
26.	Image 5: Mr Diviney at the Leeds Site	31 October 2025	47

[illegible]

## Fifth Inspection (November) Photographs

### Lumley Street Depot - Warning Notice

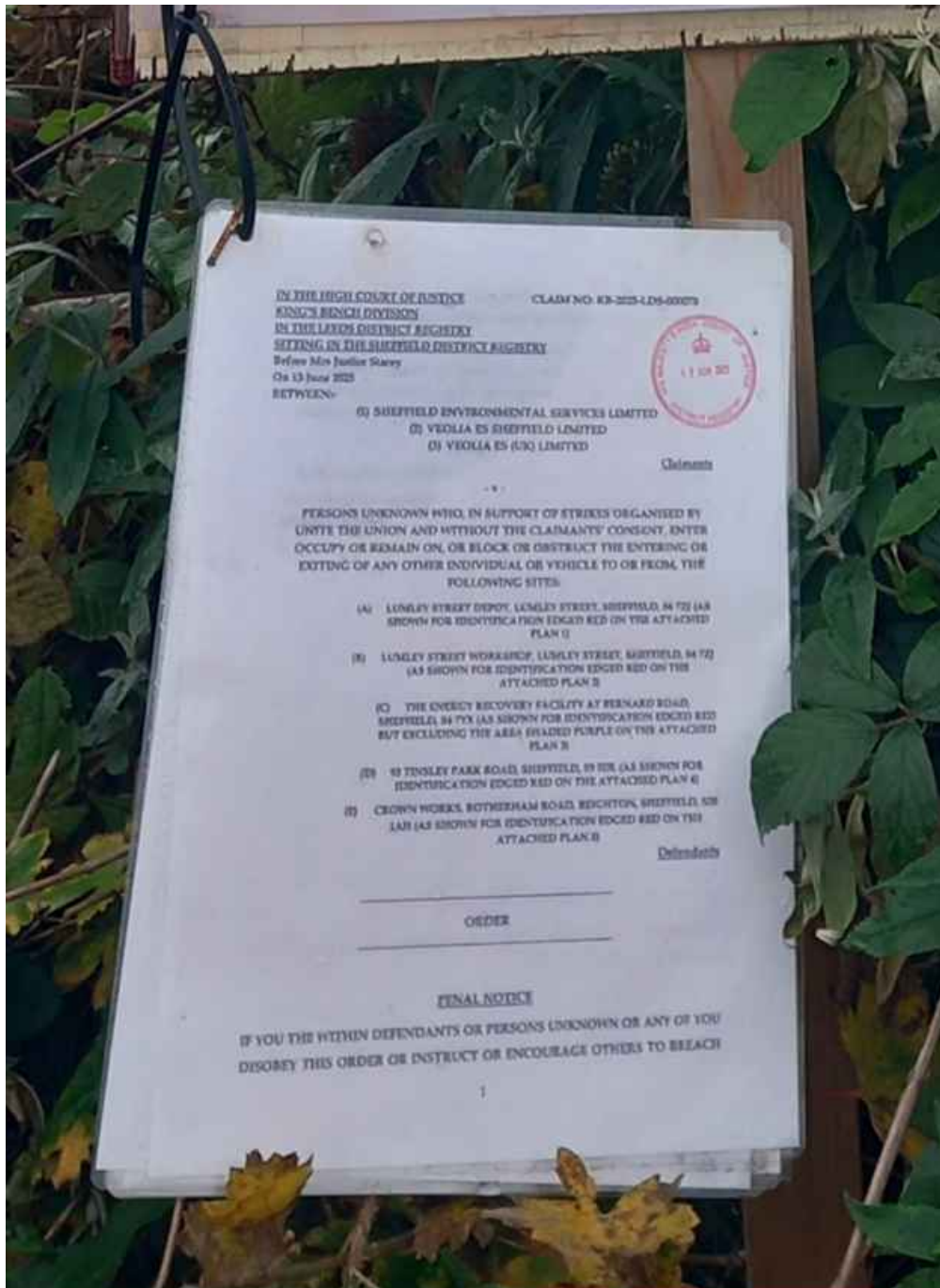
4 November 2025





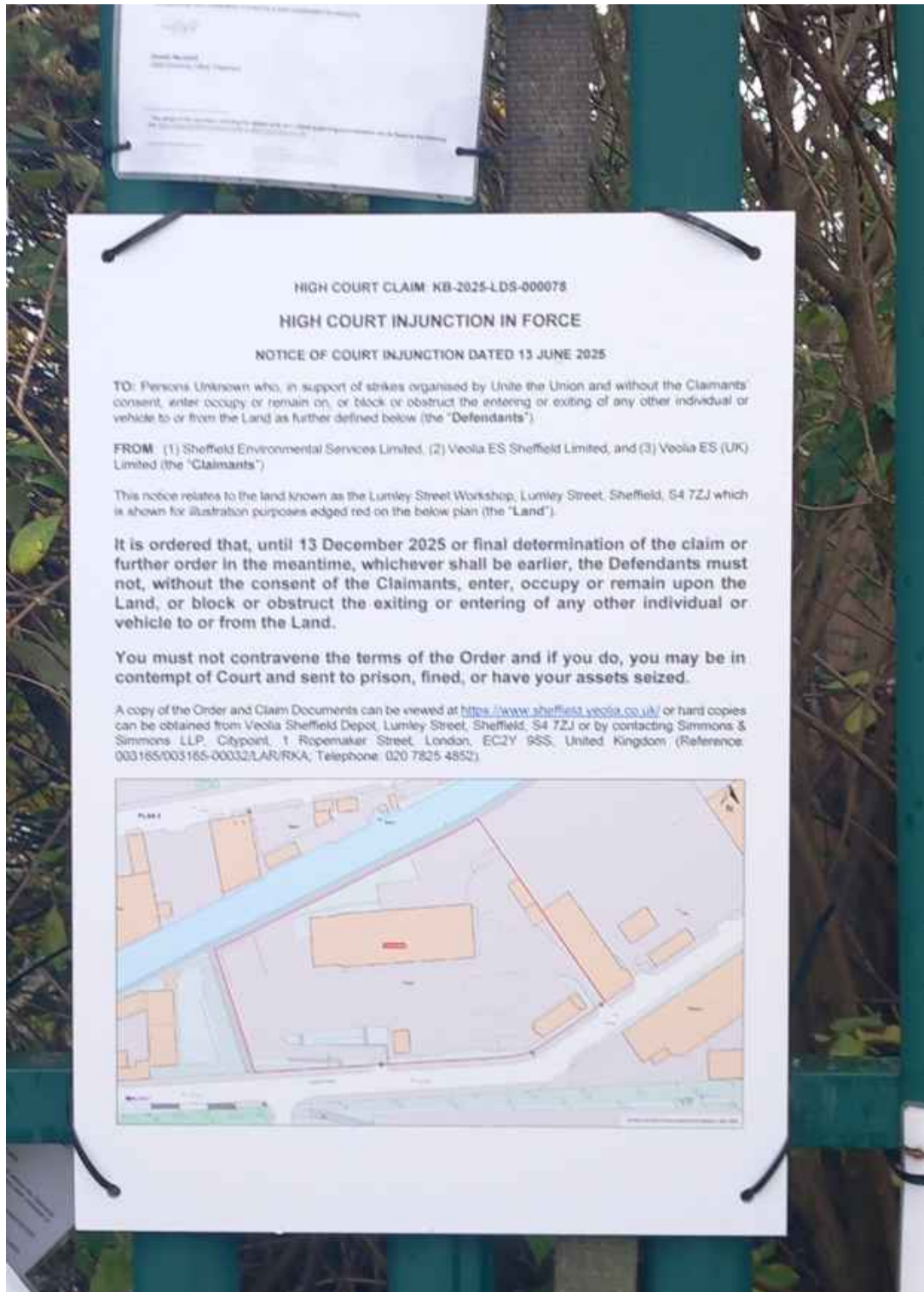
## Lumley Street Depot – Injunction Order

4 November 2025



## Workshop Entrance – Warning Notice

4 November 2025



Workshop Entrance – Injunction Order

4 November 2025





## Workshop Exit – Warning Notice

4 November 2025



## Workshop Exit – Injunction Order

4 November 2025



## ERF Entrance – Warning Notice and Resealed Injunction Order

3 November 2025



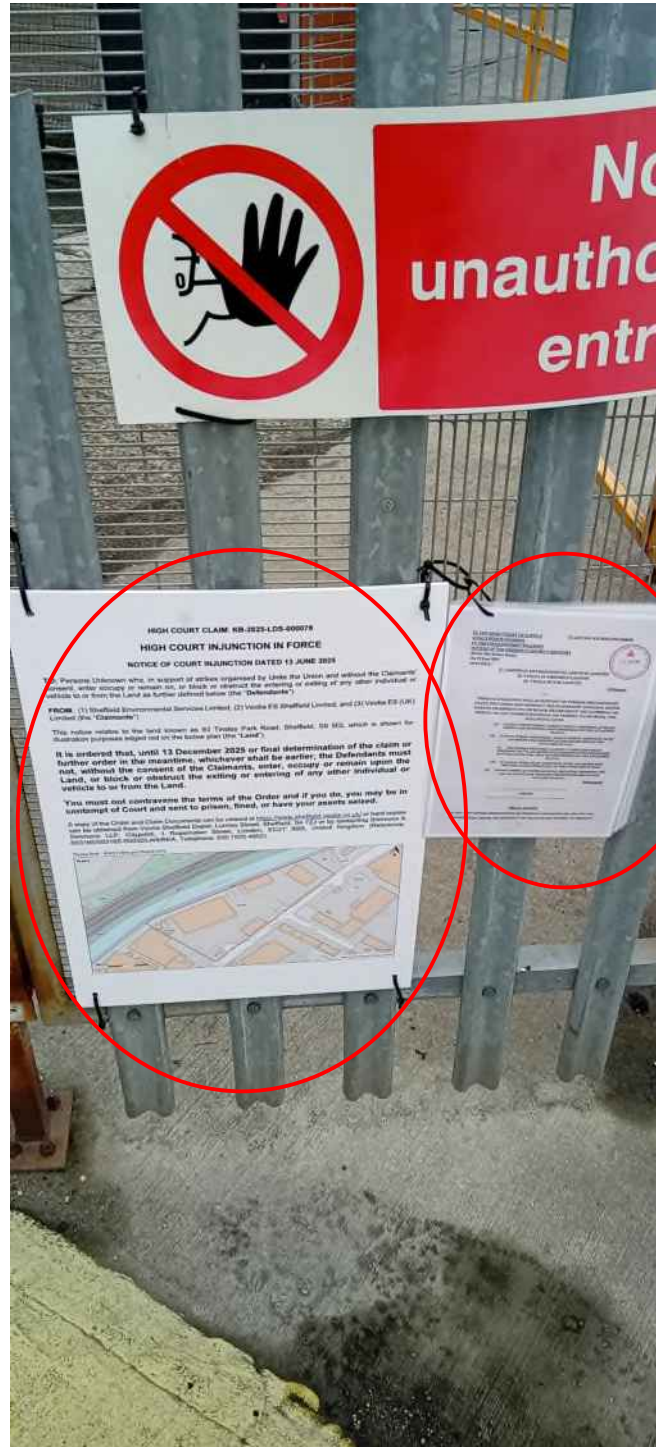


## ERF Exit – Warning Notice and Resealed Injunction Order

3 November 2025



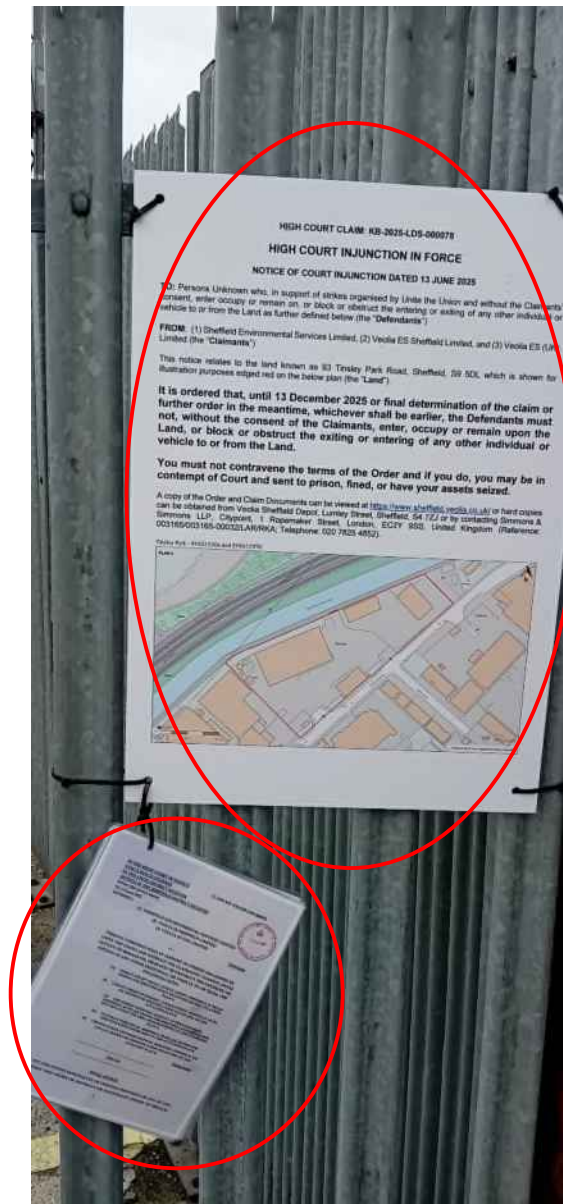
5 November 2025





## Tinsley Park Road Exit – Warning Notice and Injunction Order

1 October 2025



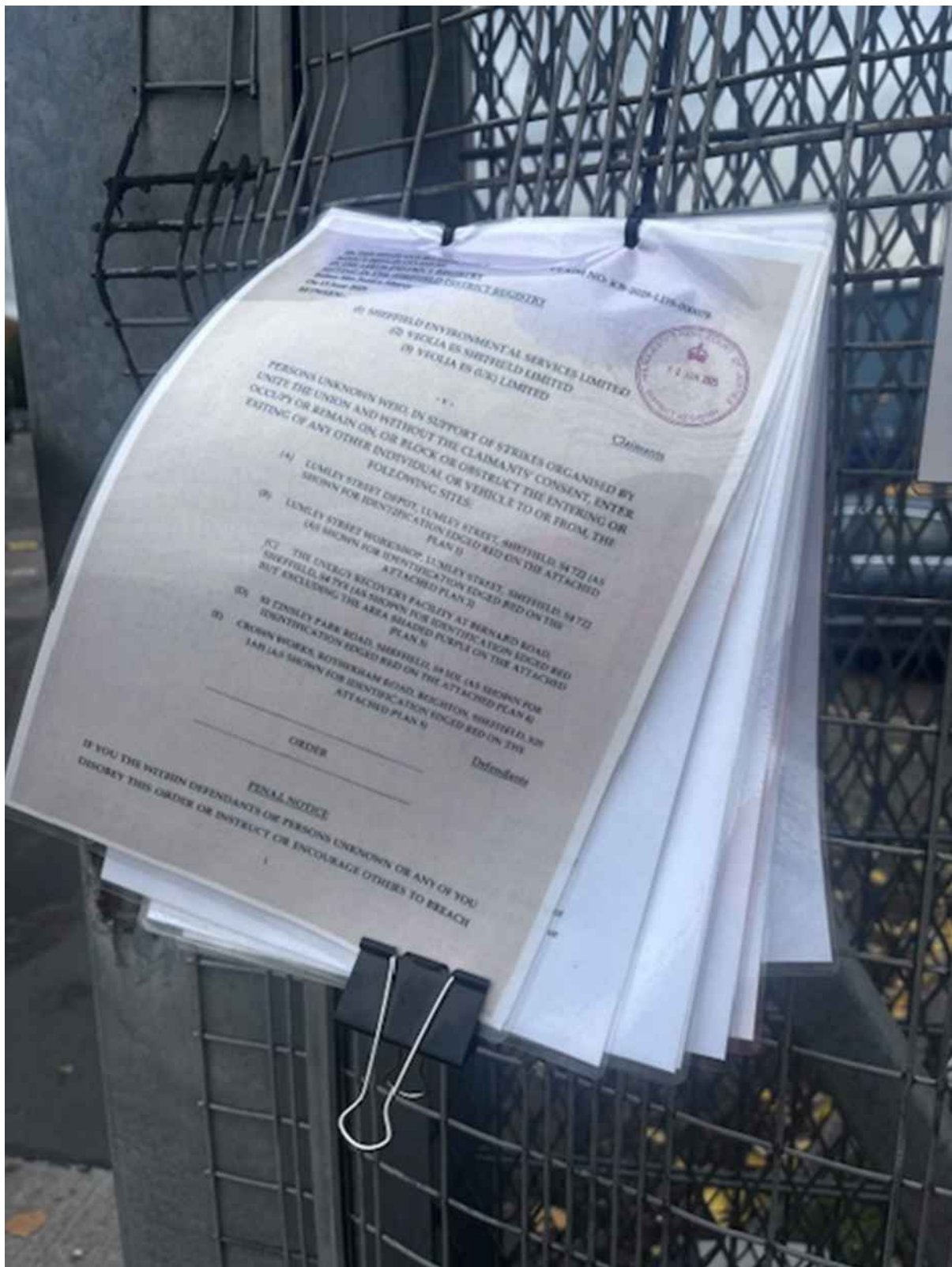
## Beighton – Warning Notice

3 November 2025



## Beighton – Injunction Order

3 November 2025



**In the High Court, Leeds District Registry**

**Claim No: KB-2025-LDS-000078**

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

**Defendants:** Persons Unknown who, in connection with strikes organised by Unite the Union and without the Claimants' consent, enter occupy or remain on, or prevent slow down or otherwise interfere with the access or egress of any other individual or vehicle to or from this site.

Please take notice that the Claimants have brought a claim in the High Court and an urgent application seeking an injunction preventing the Defendants from, without the Claimants' consent:

- Entering, occupying or remaining on this site; and,
- Preventing, slowing down or otherwise interfering with the access or egress 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 also be obtained in hard copy from Lumley Street Depot, Sheffield, S4 7ZJ.

The application for an injunction will soon be heard in the Leeds Combined Court Centre, 1 Oxford Row, Leeds, LS1 3BG. 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.



## Tab 4

### Workshop Entrance – Sealed Application Notice and Notice to Affix at Sites

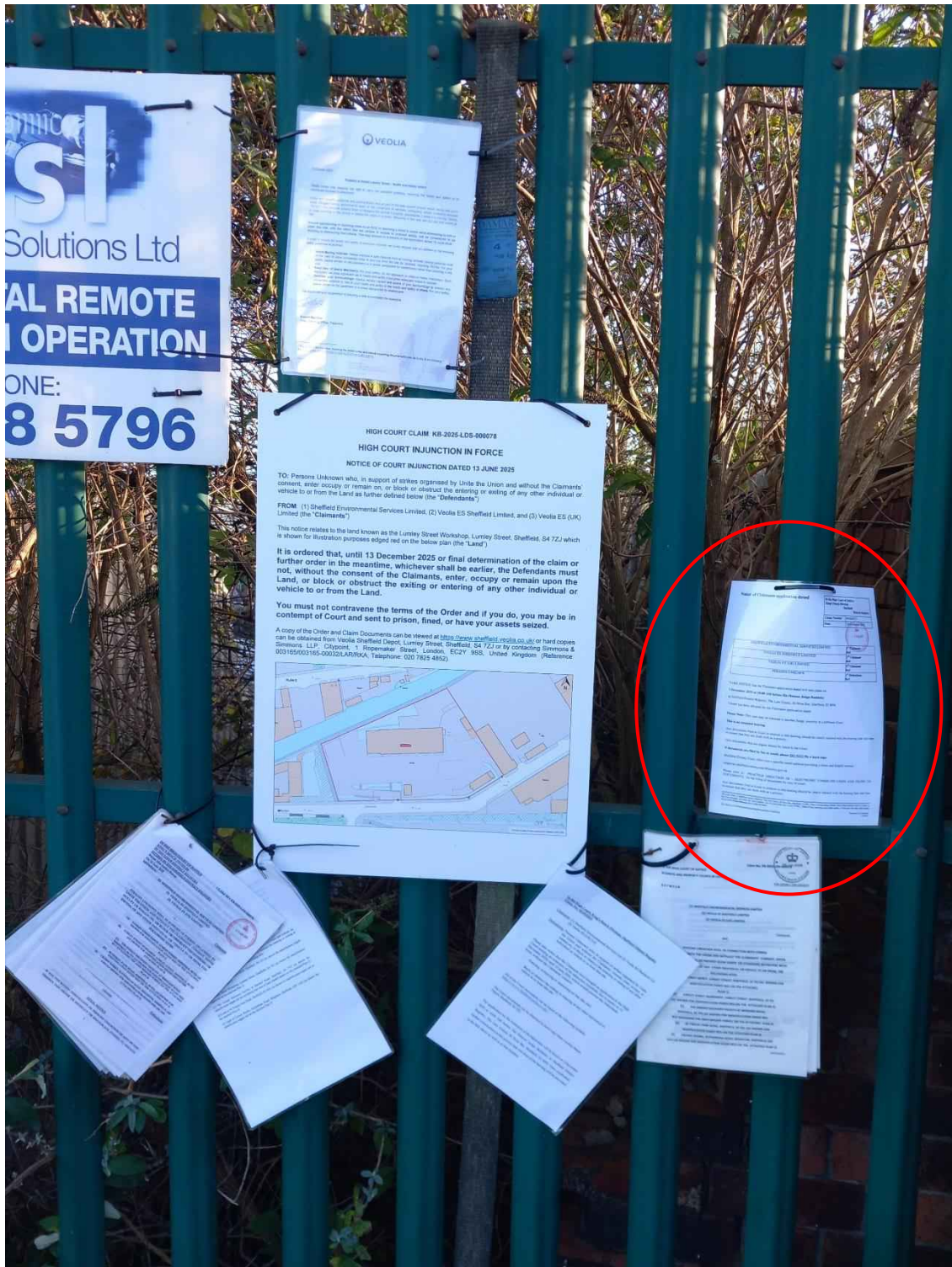
20 November 2025



Tab 5

## Workshop Entrance – Hearing Notice

28 November 2025

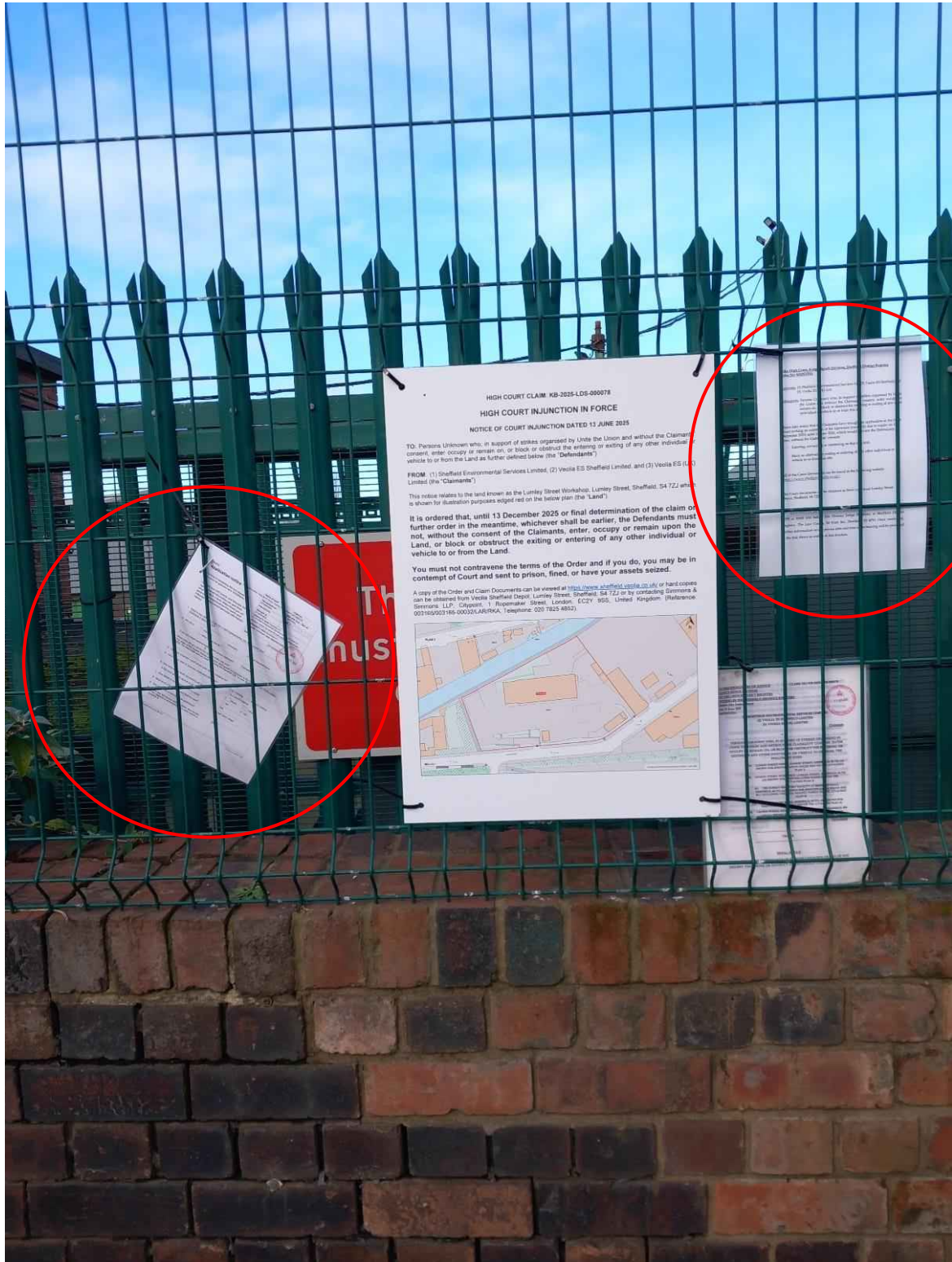




Tab 6

## Workshop Exit – Sealed Application Notice and Notice to Affix at Sites

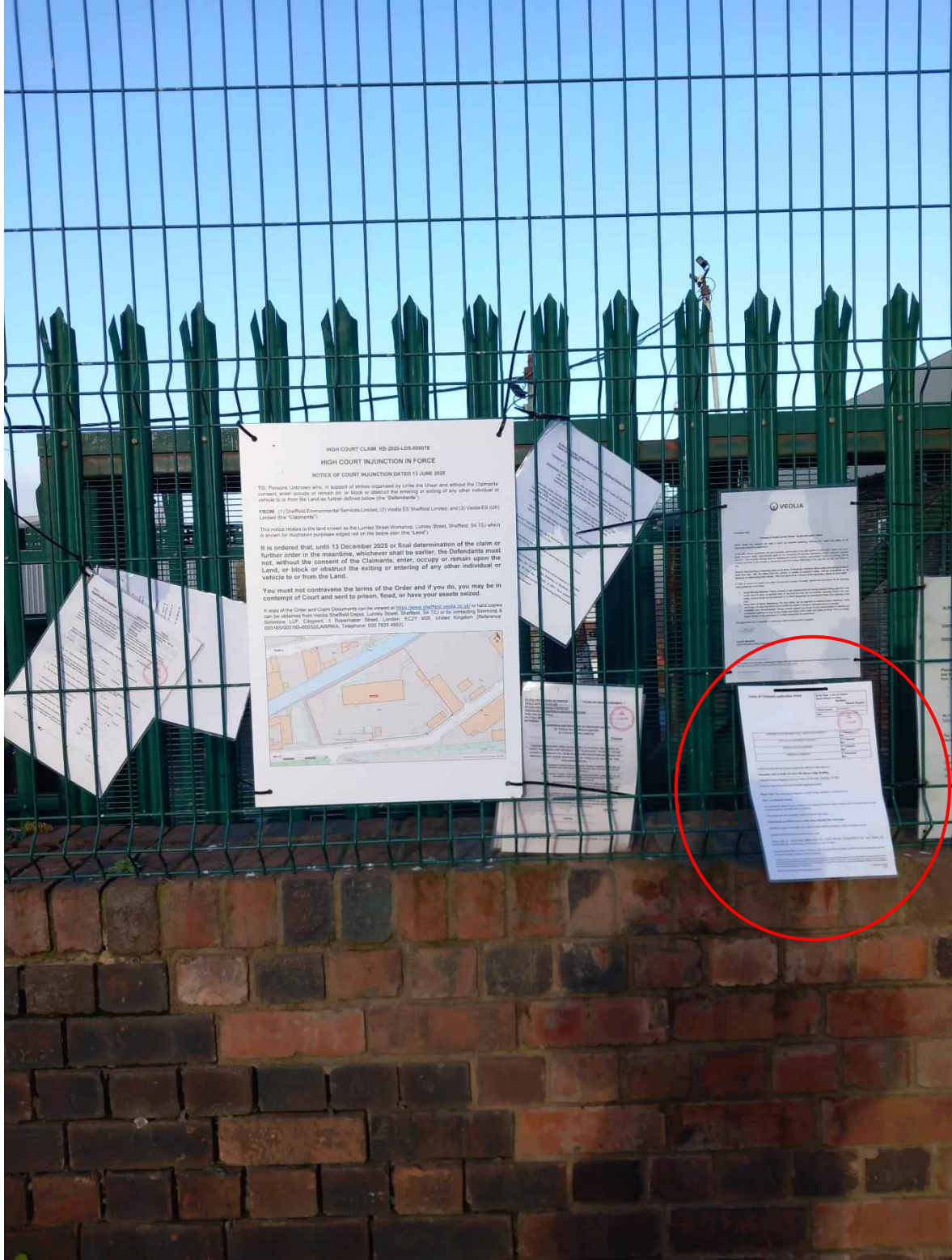
20 November 2025



Tab 7

## Workshop Exit – Hearing Notice

28 November 2025

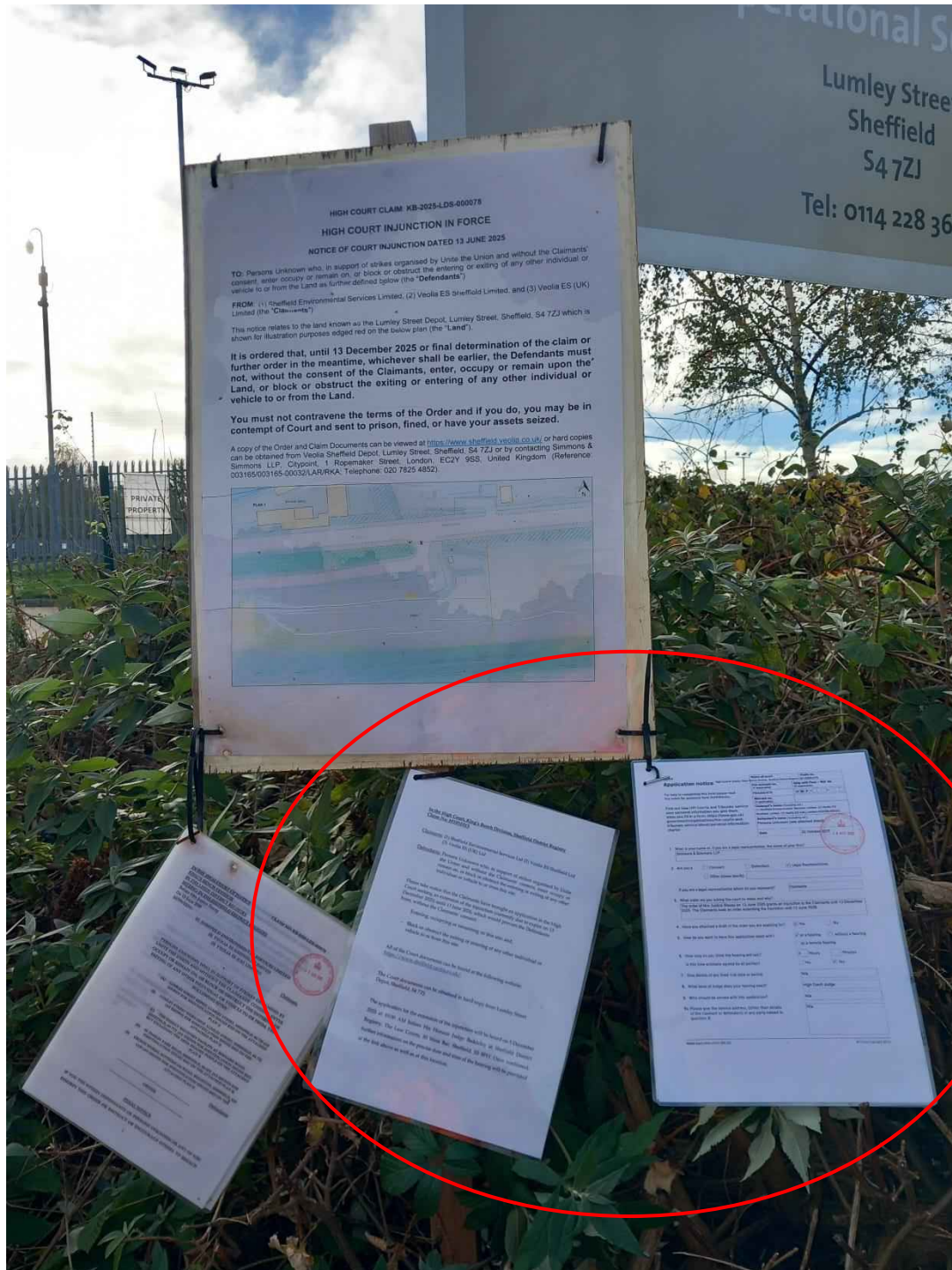




## Tab 8

### Lumley Street Depot – Sealed Application Notice and Notice to Affix at Sites

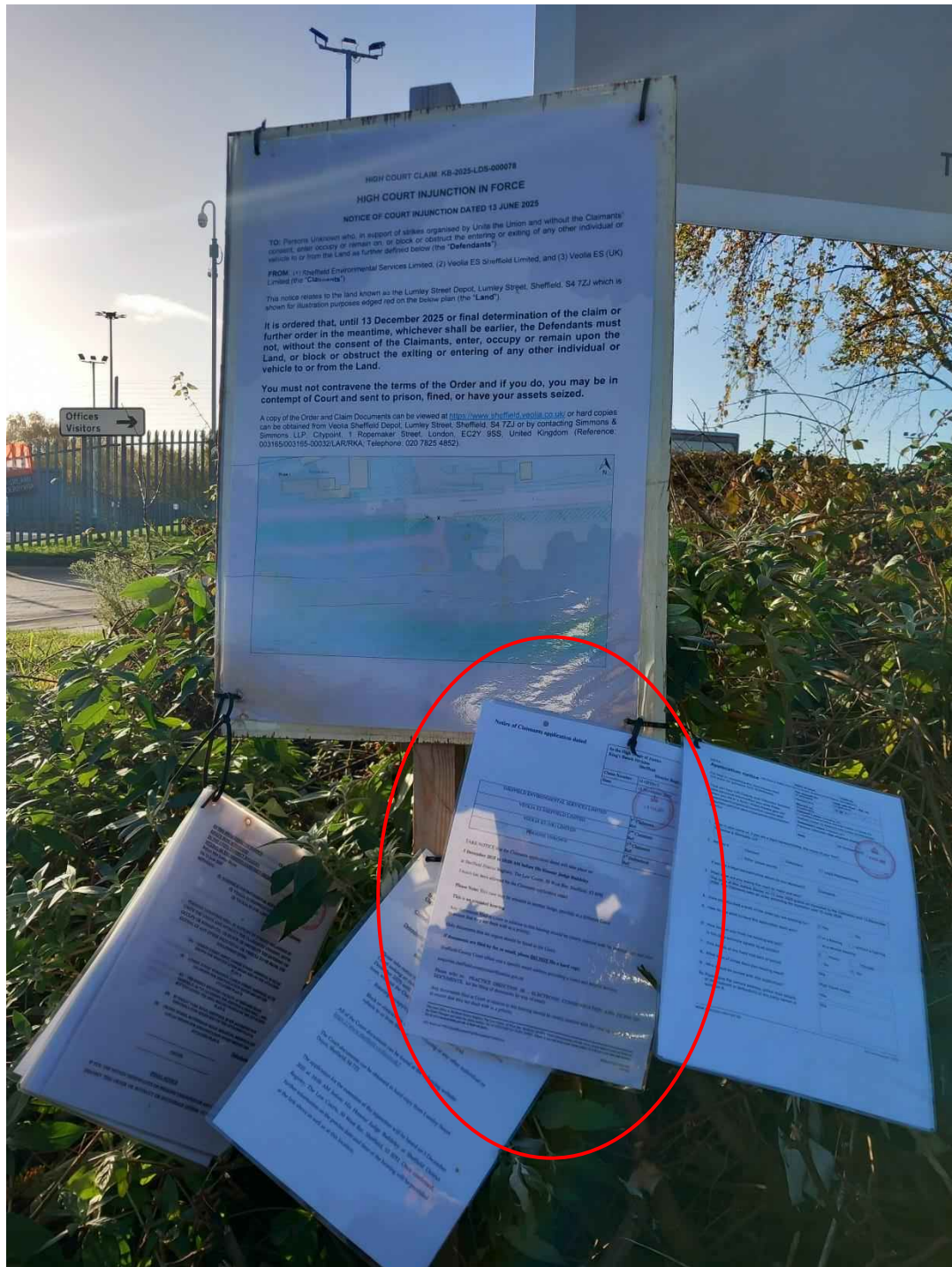
20 November 2025



Tab 9

## Lumley Street Depot – Hearing Notice

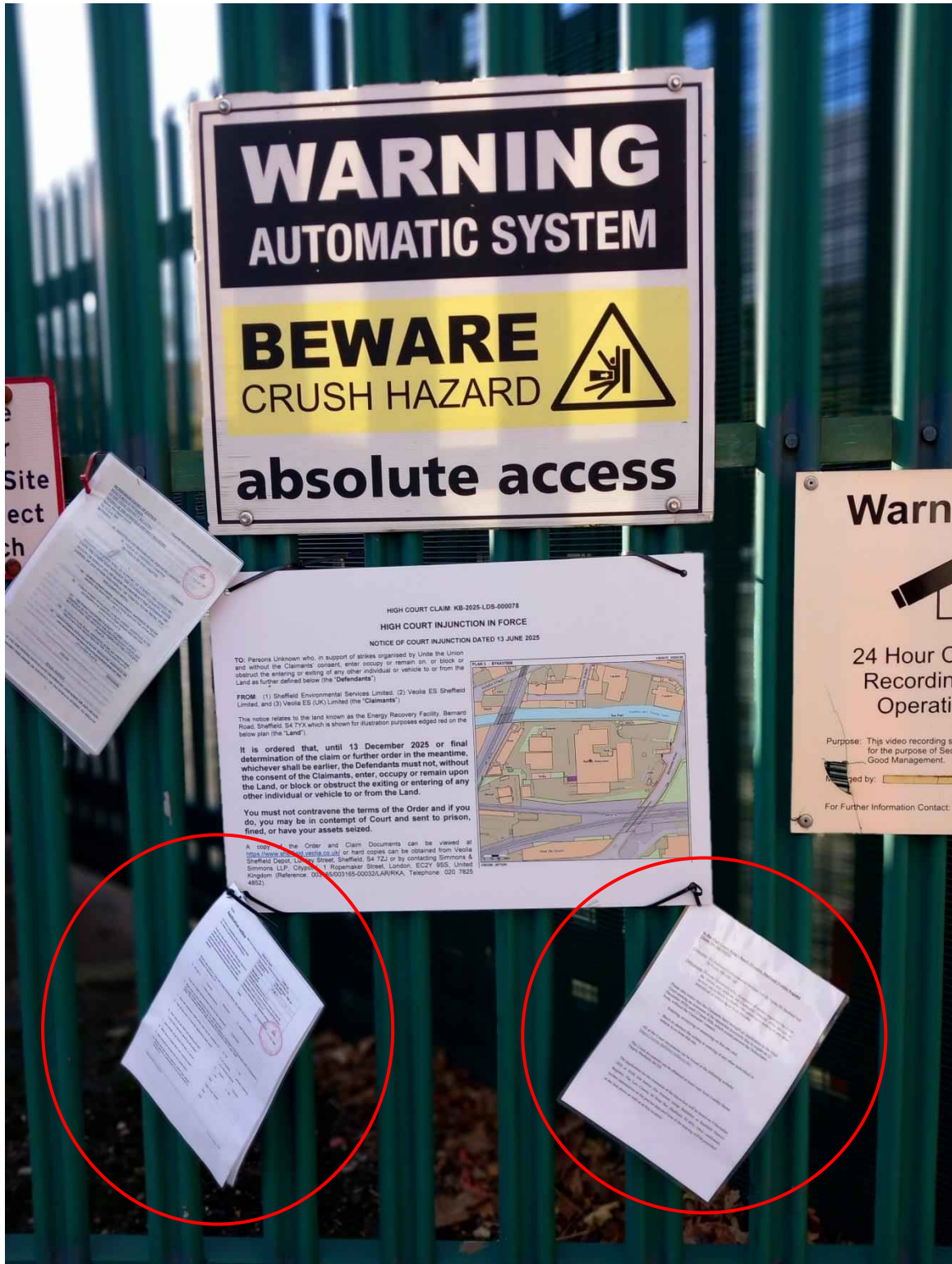
28 November 2025





ERF Entrance – Sealed Application Notice and Notice to Affix at Sites

20 November 2025



Tab 11

## ERF Entrance – Hearing Notice

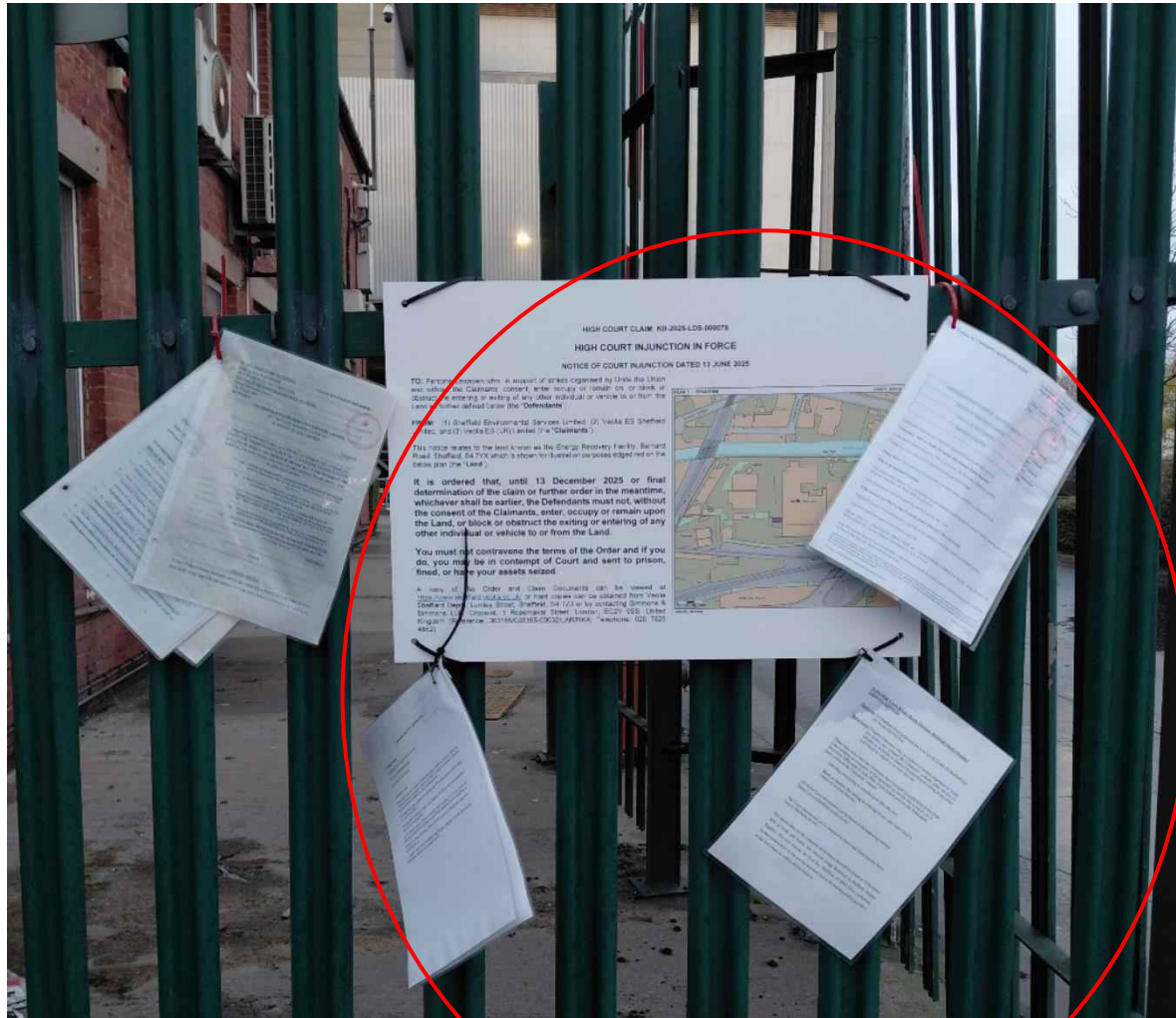
28 November 2025



## Tab 12

### ERF Exit – Sealed Application Notice, Notice to Affix at Sites and Hearing Notice

24 November 2025

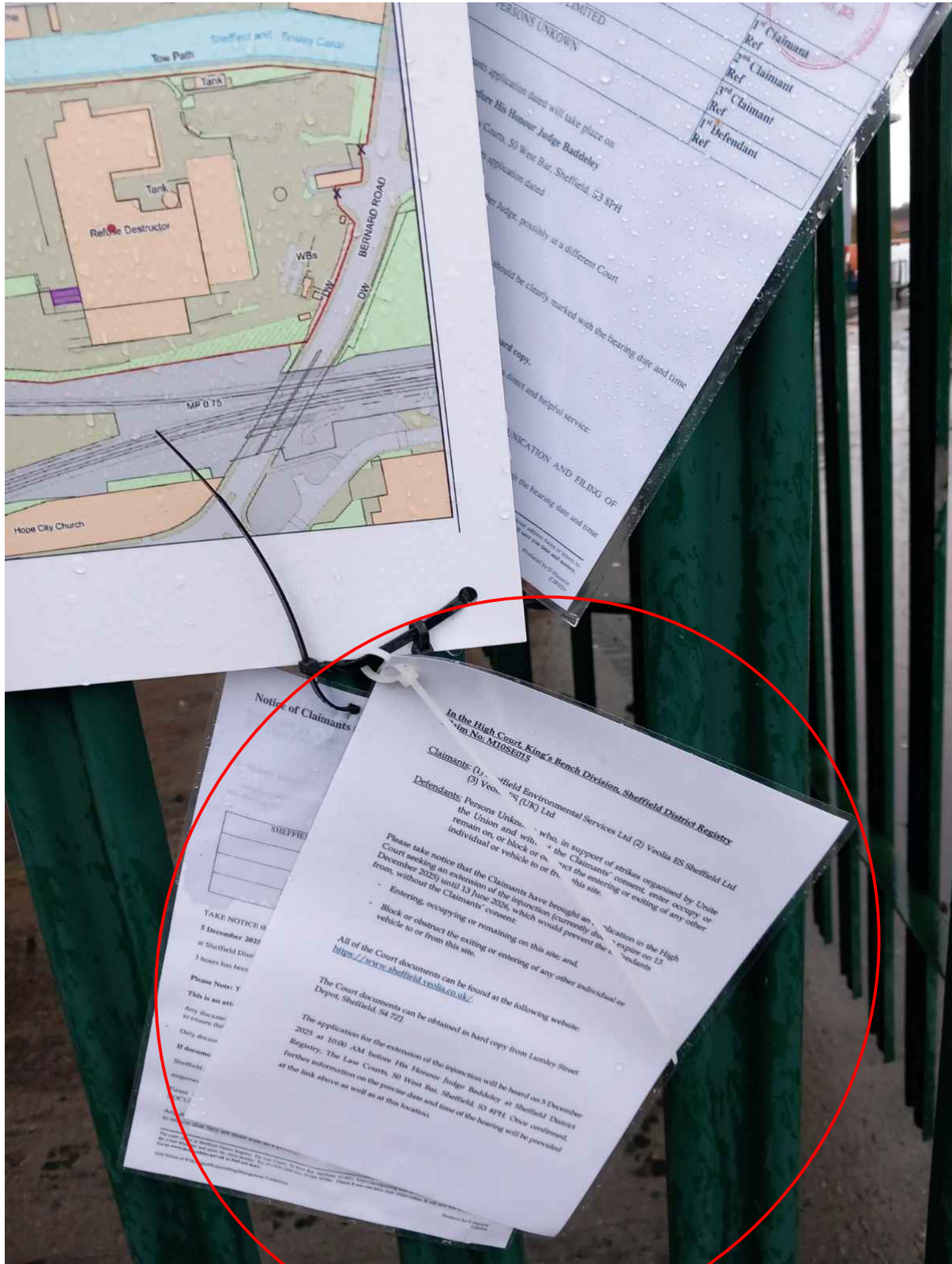




Tab 13

## ERF Exit – Notice to Affix at Sites

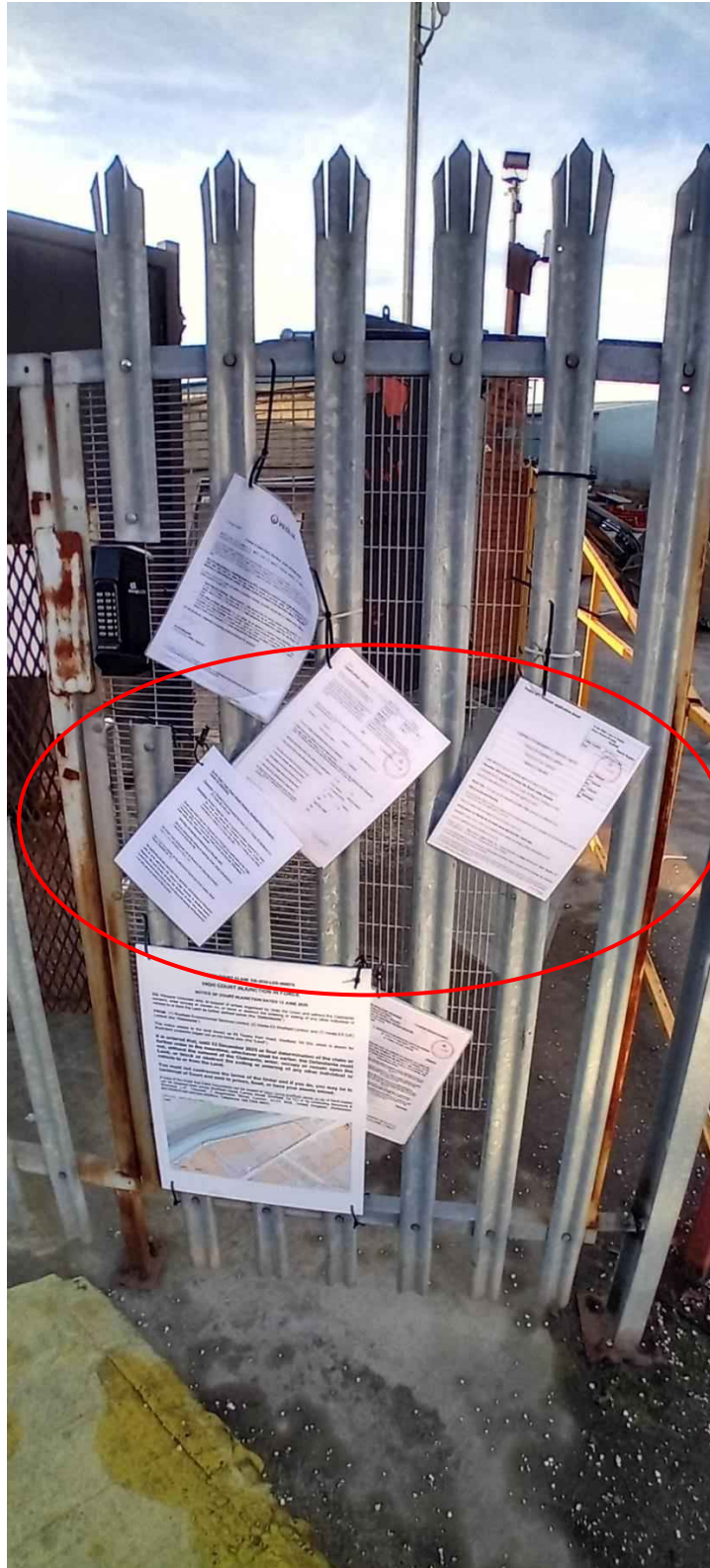
1 December 2025



Tab 14

**Tinsley Park Road Entrance – Sealed Application Notice, Notice to Affix at Sites and Hearing Notice**

21 November 2025

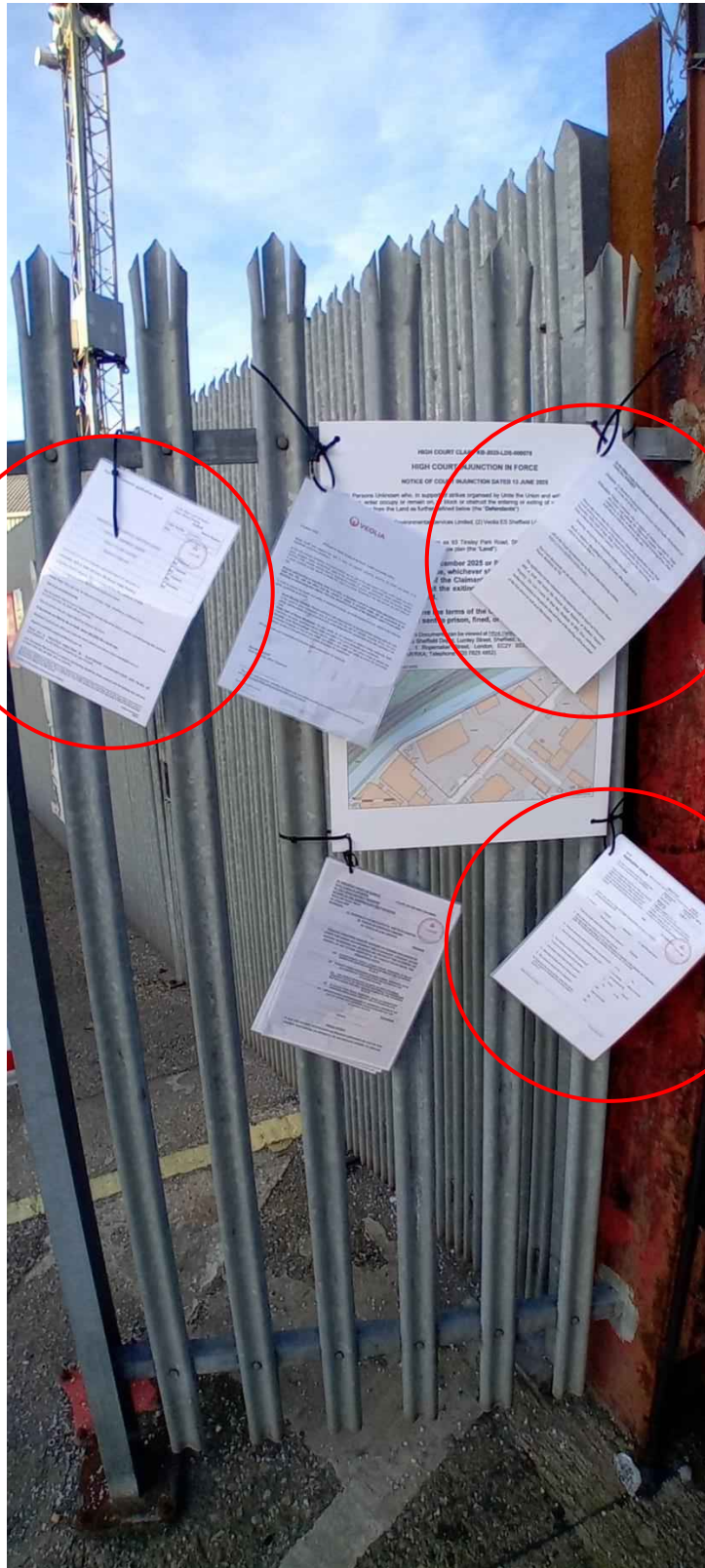




Tab 15

**Tinsley Park Road Exit – Sealed Application Notice, Notice to Affix at Sites and  
Hearing Notice**

21 November 2025





**Beighton – Sealed Application Notice and Notice to Affix at Sites**

20 November 2025



46

## 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. M105E015 (previously Claim No. KB-2025-LDS-000678).

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 Badoeley 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, the video exhibits for SJG1 and DAF1 are not currently available for download on this page. These documents are available upon request by emailing [veolainjunction@simmons-simmons.com](mailto:veolainjunction@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 - 493 KB )
4. First Witness Statement of Dean Anthony Ford ( PDF - 1.38 MB )
5. Exhibit DAF1 ( PDF - 13.3 MB )
6. First Witness Statement of Sophie Jey Garraty ( PDF - 699.76 KB )
7. Exhibit SJG1 ( PDF - 13.35 MB )
8. Second Witness Statement of Donald John Fraser Macphail ( PDF - 74.77 KB )
9. Exhibit DM2 ( PDF - 7.9 MB )
10. Third Witness Statement of Robert Allen ( PDF - 195.21 KB )
11. Exhibit RCKA3 ( PDF - 16.13 MB )

### Documents relating to the injunction and the hearing on 13 June 2025

Documents relating to the Injunction and the hearing on 13 June 2025 can be obtained using the links below.

#### Injunction application

1. Injunction Order (Sealed on 13 June 2025) ( PDF - 3.39 MB )
2. Hearing Bundle ( PDF - 85.94 MB )
3. Exhibit EJ1 - Video Evidence (1) ( ZIP - 193.07 MB )
4. Exhibit EJ1 - Video Evidence (2) ( ZIP - 217.29 MB )
5. Exhibit EJ2 - Video Evidence (1) ( ZIP - 231.65 MB )
6. Exhibit EJ2 - Video Evidence (2) ( ZIP - 163.65 MB )
7. Supplemental Hearing Bundle ( PDF - 34.60 MB )
8. Skeleton Argument ( DOCX - 72.24 KB )
9. Authorities Bundle ( PDF - 5.61 MB )
10. Witness Statement of Robert Allen ( PDF - 132.05 KB )
11. Exhibit RCKA1 ( PDF - 8.32 MB )
12. Second Witness Statement of Robert Allen ( PDF - 131.16 KB )
13. Exhibit RCKA2 ( PDF - 6.3 MB )
14. Transcript of Hearing on 13 June 2025 ( PDF - 631.26 KB )
15. Response Pack ( PDF - 1.09 MB )
16. Amended Claim Form (sealed) ( PDF - 340.42 KB )
17. Amended Particulars of Claim (sealed) ( PDF - 384.5 KB )
18. Approved Judgment of Mrs Justice Stacey DBE ( PDF - 416.54 KB )



# 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) 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 )

#### Documents relating to the injunction and the hearing on 13 June 2025

Documents relating to the Injunction and the hearing on 13 June 2025 can be obtained using the links below.

#### Injunction application

 **1. Injunction Order (Sealed on 13 June 2025)** ( PDF - 3.39 MB )

 **2. Hearing Bundle** ( PDF - 85.94 MB )

 **3. Exhibit EJ1 - Video Evidence (1)** ( ZIP - 193.07 MB )

 **4. Exhibit EJ1 - Video Evidence (2)** ( ZIP - 217.29 MB )

 **5. Exhibit EJ2 - Video Evidence (1)** ( ZIP - 231.65 MB )

 **6. Exhibit EJ2 - Video Evidence (2)** ( ZIP - 163.65 MB )


 **7. Supplemental Hearing Bundle** ( PDF - 34.69 MB )

 **8. Skeleton Argument** ( DOCX - 72.24 KB )


 **9. Authorities Bundle** ( PDF - 5.61 MB )

 **10. Witness Statement of Robert Allen** ( PDF - 132.05 KB )

 **11. Exhibit RCKA1** ( PDF - 8.32 MB )

 **12. Second Witness Statement of Robert Allen** ( PDF - 131.16 KB )

 **13. Exhibit RCKA2** ( PDF - 6.3 MB )

 **14. Transcript of Hearing on 13 June 2025** ( PDF - 631.26 KB )

 **15. Response Pack** ( PDF - 1.09 MB )

 **16. Amended Claim Form (sealed)** ( PDF - 340.42 KB )

 **17. Amended Particulars of Claim (sealed)** ( PDF - 384.5 KB )

 **18. Approved Judgment of Mrs Justice Stacey DBE** ( PDF - 416.54 KB )





Garraty, Sophie &lt;sophie.garraty@veolia.com&gt;

**Re: Protester - Friday**

1 message

**Wedlake, David** <david.wedlake@veolia.com>  
To: "Garraty, Sophie" <sophie.garraty@veolia.com>

4 November 2025 at 10:12

The police never attended, we cancelled them before they had a chance to [attend.as](#) the protesters had left

Regards,

Dave

**David Wedlake**

*Plant Manager*

Tel.: +44 (0)2035678449 m. +44 (0)7920410829

Veolia Recycling and Energy Recovery Facility, Newmarket Approach, LS9 0RJ | Leeds | [United Kingdom](#)

[www.veolia.co.uk](http://www.veolia.co.uk)



On Tue, 4 Nov 2025 at 10:11, Garraty, Sophie <sophie.garraty@veolia.com> wrote:

Thanks Dave - do you know what time to police arrived.

Kind regards Sophie

On Tue, 4 Nov 2025 at 07:37, Wedlake, David <david.wedlake@veolia.com> wrote:

Morning Sophie,

The protesters arrived at 10:20, commenced blocking the vehicle entrance at 10:21. They finished their blocking action and left at 11:09.

They physically prevented 4 LCC RCV's from entering the site and another 8 decided to not even try to enter and drove next door to the LCC RCV depot.

From reviewing the footage I believe the two men in your photo's are the two men in my photo's attached.

Regards,

Dave

**David Wedlake**

*Plant Manager*

Tel.: +44 (0)2035678449 m. +44 (0)7920410829

Veolia Recycling and Energy Recovery Facility, Newmarket Approach, LS9 0RJ | Leeds | [United Kingdom](#)

[www.veolia.co.uk](http://www.veolia.co.uk)



On Mon, 3 Nov 2025 at 16:15, Garraty, Sophie <sophie.garraty@veolia.com> wrote:

Hi all, I hope you are able to help,

Further to the protesters that attended Leeds ERF on Friday, I believe from Dave that you spoke to the organisers and was wondering if you could confirm

1. The start time and end time of the direct action (e.g. what time did the protestors arrive and what time did they leave).
2. How many vehicles in total were blocked from entering the site.
3. What time the police arrived

In addition, I appreciate the individuals had masked on - however from reviewing the footage - I believe the following two people below may have been there: Please can you confirm if you recognise them (or the brown baseball) hat.

Kind regards Sophie









--

**Sophie Garraty***Senior ER Specialist*

Tel.: +44 (0) 7442 944 737

8th Floor, 210 Pentonville Road | London | United Kingdom

[www.veolia.co.uk](http://www.veolia.co.uk)

--

**Sophie Garraty***Senior ER Specialist*

Tel.: +44 (0) 7442 944 737

8th Floor, 210 Pentonville Road | London | United Kingdom

[www.veolia.co.uk](http://www.veolia.co.uk)

Tab 21

Image 1: Screenshot of CCTV footage at the Leeds Site on 31 October 2025 at 10:59



Tab 22

Image 2: Screenshot of CCTV footage at the Leeds Site on 31 October 2025 at 10:48





Garraty, Sophie &lt;sophie.garraty@veolia.com&gt;

**Re: Protester - Friday**

1 message

**Booth, James** <james.booth@veolia.com>

4 November 2025 at 09:46

To: "Flint, Russell" &lt;russell.flint@veolia.com&gt;

Cc: "Johnson, Helen" &lt;helen.johnson@veolia.com&gt;, "Garraty, Sophie" &lt;sophie.garraty@veolia.com&gt;, David Wedlake &lt;david.wedlake@veolia.com&gt;

Morning Sophie,  
I also concur with Helen.

Regards,

**Jim Booth** *fCMgr MCM*  
**Operations Manager**

☎ +44 (0) 203 567 8433

Mob +44 (0) 7918589085

Veolia ES Leeds, Recycling and Energy Recovery Facility, Newmarket Approach, Leeds, LS9 0RJ

[www.veolia.co.uk](http://www.veolia.co.uk)[Induction Portal](#) - For visitors, contractors, and drivers[www.veolia.co.uk](http://www.veolia.co.uk)

On Tue, 4 Nov 2025 at 08:04, Flint, Russell &lt;russell.flint@veolia.com&gt; wrote:

Hi Sophie

I agree with Helen's response.

**Russell Flint***Contract Performance Manager*

Tel.: +44 (0) 7827 305 408

Veolia Recycling and Energy Recovery Facility, Newmarket Approach | Leeds | LS9 0RJ | United Kingdom

[www.veolia.co.uk](http://www.veolia.co.uk)

On Tue, 4 Nov 2025 at 07:33, Johnson, Helen &lt;helen.johnson@veolia.com&gt; wrote:

Good morning Sophie

I believe that both of the people in the attached photos were members of the protest group who were at the site entrance last Friday. The gentleman in the baseball cap was definitely the group 'leader', and I'm 99% sure that the other gentleman was also present.

Dave will confirm times and the number of vehicles affected.

Kind regards, Helen

**Helen Johnson****Business Support Coordinator****United Kingdom**



Tel: +44 (0) 203 567 8455 | Mob: +44 (0) 7780 680522

Veolia ES Leeds, Recycling and Energy Recovery Facility, Newmarket Approach, Leeds, LS9 0RJ  
[www.veolia.co.uk](http://www.veolia.co.uk)

On Mon, 3 Nov 2025 at 16:15, Garraty, Sophie <[sophie.garraty@veolia.com](mailto:sophie.garraty@veolia.com)> wrote:

Hi all, I hope you are able to help,

Further to the protester s that attended Leeds ERF on Friday, I believe from Dave that you spoke to the organisers and was wondering if you could you confirm

1. The start time and end time of the direct action (e.g. what time did the protestors arrive and what time did they leave).
2. How many vehicles in total were blocked from entering the site.
3. What time the police arrived

In addition, I appreciate the individuals had masked on - however from reviewing the footage - I believe the following two people below may have been there: Please can you confirm if you recognise them (or the brown baseball) hat.

Kind regards Sophie







--

**Sophie Garraty***Senior ER Specialist*

Tel.: +44 (0) 7442 944 737

8th Floor, 210 Pentonville Road | London | United Kingdom

[www.veolia.co.uk](http://www.veolia.co.uk)



Tab 24

Image 3: Mr Diviney at the Leeds Site





Tab 25

Image 4: Mr Diviney at the Leeds Site





Tab 26

Image 5: Mr Diviney at the Leeds Site



- 1) Made on behalf of the Claimants
- 2) R Allen
- 3) Fourth Witness Statement
- 4) Exhibit RCKA4
- 5) Dated 1 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**

---

**FOURTH WITNESS STATEMENT OF ROBERT CHARLES  
KINKEAD ALLEN**

---

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

## **SECTION A: INTRODUCTION**

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 fourth witness statement in these proceedings.
2. 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.
3. 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.
4. I exhibit to this statement a paginated bundle of documents marked "**RCKA4**" to which I shall refer in the course of this statement. References in this statement in bold square brackets in the form **[RCKA4/[•]]** are to the pages of Exhibit RCKA4.

## **SECTION B: NOTIFICATION**

5. On 29 October 2025, Claimants filed the Injunction Extension Application **[RCKA4/3-8]**.
6. The Injunction Extension Application was sealed on 18 November 2025 (the "Sealed Application Notice"). That same day, the Court provided S&S with a copy of the Sealed Application Notice together with a notice listing the hearing of the Injunction Extension Application for 10:00am on 5



December 2025 before His Honour Judge Baddeley (the "Hearing Notice") [RCKA4/9-17].

7. In accordance with paragraph 10 of the Injunction Order, the Claimants are required to notify the Defendants of the Injunction Extension Application by:
  - (A) Uploading a copy of the application onto the "Veolia Sheffield Injunction" webpage <https://www.sheffield.veolia.co.uk> (the "Website") (paragraph 10(a));
  - (B) Sending an email to [neiltodd@thompsons.law](mailto:neiltodd@thompsons.law) stating that an application has been made and providing those application documents (paragraph 10(b)); and
  - (C) Affixing a notice to those locations marked with an "x" on Plans 1-5 of the Injunction Order stating that the application has been made and where it can be accessed online (paragraph 10(c)).
8. In accordance with paragraph 11 of the Injunction Order, the Claimants are also required to notify the Defendants of any further documents by carrying out steps 7(a) and 7(b) above only.
9. Pursuant to paragraph 12 of the Injunction Order, in respect of paragraphs 10 and 11 of the Injunction Order, effective notification will be deemed to have taken place on the date on which all of the relevant steps have been carried out. As I explain below in paragraphs (A)-(D), the relevant steps for notifying the Defendants of the Injunction Extension Application were carried out by 25 November 2025 (subject to a point on video evidence). The relevant steps for notifying the Defendants of the Hearing Notice were carried out by 20 November 2025, as explained in paragraphs (A) and (C) below. As some of the relevant notification steps were undertaken by the Claimants, Ms Sophie Joy Garraty addresses these steps in her second witness statement dated 1 December 2025 ("Garraty 2") and I refer to Garraty 2 where necessary. The relevant steps were completed as follows:

- (A) At 16:29 on 18 November 2025, S&S sent an email to [neiltodd@thompsons.law](mailto:neiltodd@thompsons.law) attaching a copy of the Sealed Application Notice, a draft order, and enclosing the Claimants' witness evidence in support of the Injunction Extension Application via a secure file transfer protocol link (the "Injunction Extension Application Documents"), along with a copy of the Hearing Notice (in accordance with paragraphs 10(b) and 11 of the Injunction Order) **[RCKA4/18]**.
- (B) As explained in paragraphs 17 to 19 of Garraty 2, in accordance with paragraph 10(c) of the Injunction Order, Ms Garraty arranged for copies of the required Notice to Affix at Sites (as defined in paragraph 16 of Garraty 2) and the Sealed Application Notice to be affixed at each of the locations marked "X" on Plans 1 to 5 of the Injunction Order, which according to Garraty 2 was completed as of 24 November 2025 (subject to the explanation paragraph 19 of Garraty 2 that the Notice to Affix at Sites was briefly removed from the ERF Exit on 28 November 2025 and replaced on 1 December 2025). For completeness, Ms Garraty also arranged for copies of the Hearing Notice to be affixed at each of the locations marked "X" on Plans 1 to 5 of the Injunction Order, which was completed on 28 November 2025, as explained in paragraph 22 of Garraty 2.
- (C) In accordance with paragraphs 10(a) and 11 of the Injunction Order, and as explained at paragraph 20 of Garraty 2, on 20 November 2025, the Claimants uploaded the Hearing Notice and the Injunction Extension Application Documents (with the exception of the video evidence) to the Website. I am instructed that there were initially logistical difficulties in uploading the larger video files exhibited with the first witness statement of Sophie Joy Garraty ("Garraty 1") and the first witness statement of Dean Anthony Ford ("Ford 1") to the Website, hence a statement was added to the Website explaining that the video evidence was not available to download due to file

size restrictions, but that copies could be obtained upon request by emailing [veoliainjunction@simmons-simmons.com](mailto:veoliainjunction@simmons-simmons.com).

- (D) As explained at paragraph 21 of Garraty 2, on 25 November 2025, the video evidence in Exhibits DAF1 and SJG1 was subdivided into smaller zip folders, which were then uploaded to the Website. In place of the original individual video files which exceeded the size restrictions, PDF slip sheets were uploaded containing instructions on how to access the relevant material. A statement was also added to the Website explaining that certain video evidence was not available to download due to file size restrictions, but that copies could be requested by emailing [veoliainjunction@simmons-simmons.com](mailto:veoliainjunction@simmons-simmons.com).

#### **SECTION C: OTHER**

10. I refer to paragraph 29 of my Third Witness Statement ("Allen 3"). For completeness, I exhibit copies of the letters that S&S wrote to Mr Diviney and Mr Tice on 29 September 2025, in relation to their participation in the August Mass Picket [RCKA/19-25] [RCKA/26-30].
11. In the interests of time, S&S will file this statement, Exhibit RCKA4, Garraty 2 and Exhibit SGJ2 with the Court in support of the Injunction Extension Application, and will combine these documents into a supplementary hearing bundle which will be notified to Thompsons via email and uploaded to the Website in accordance with paragraphs 10(a) and 10(b) of the Injunction Order.

#### **SECTION D: DUTY OF FULL AND FRANK DISCLOSURE**

12. I understand the duty of full and frank disclosure and I have sought to comply with the duty in the preparation of this statement.

#### **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



Full name

Robert Charles Kinkead Allen

Position or Office held

Partner at Simmons & Simmons LLP

Dated

01 December 2025



- 1) Made on behalf of the Claimants  
2) R Allen  
3) Fourth Witness Statement  
4) Exhibit RCKA4  
5) Dated 1 December 2025

IN THE HIGH COURT OF JUSTICE

CLAIM NO M10SE015

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

and

PERSONS UNKNOWN

Claimants

Defendants

---

EXHIBIT RCKA4

---

This is the Exhibit marked as RCKA4 referred to in the Fourth Witness Statement of Robert Charles Kinkead Allen dated 1 December 2025.

TAB	DOCUMENT	DATE	PAGES
1.	Emails from S&S to Sheffield County Court regarding the filing of the Injunction Extension Application	22 October 2025 – 29 October 2025	3-8
2.	Email from Sheffield County Court to S&S regarding listing date <i>Attachments:</i> <ul style="list-style-type: none"><li>• <i>Sealed Application Notice (sealed 22 November 2025); and</i></li><li>• <i>Hearing Notice (dated 18 November 2025).</i></li></ul>	18 November 2025	9-17

TAB	DOCUMENT	DATE	PAGES
3.	Email from S&S to Thompsons attaching Hearing Notice, Sealed Application Notice, draft order and enclosing supporting witness evidence	18 November 2025	18
4.	Letter from S&S to Joseph Diviney <i>[Enclosures not included]</i>	29 September 2025	19-25
5.	Letter from S&S to Alistair Tice <i>[Enclosures not included]</i>	29 September 2025	26-30

---

**From:** Tom Harris <[Tom.Harris@simmons-simmons.com](mailto:Tom.Harris@simmons-simmons.com)>

**Sent:** 29 October 2025 12:16

**To:** Sheffield County, Enquiries <[enquiries.sheffield.countycourt@justice.gov.uk](mailto:enquiries.sheffield.countycourt@justice.gov.uk)>; Hussein, Danielle <[Danielle.Hussein@justice.gov.uk](mailto:Danielle.Hussein@justice.gov.uk)>

**Cc:** Jonathan Rukundo <[Jonathan.Rukundo@simmons-simmons.com](mailto:Jonathan.Rukundo@simmons-simmons.com)>; Frances Gourdie <[Frances.Gourdie@Simmons-Simmons.com](mailto:Frances.Gourdie@Simmons-Simmons.com)>; Robert Allen <[Robert.Allen@simmons-simmons.com](mailto:Robert.Allen@simmons-simmons.com)>; Hannah Barton <[Hannah.Barton@simmons-simmons.com](mailto:Hannah.Barton@simmons-simmons.com)>; Claire Rhodes <[Claire.Rhodes@simmons-simmons.com](mailto:Claire.Rhodes@simmons-simmons.com)>

**Subject:** RE: M10SE015 - Claimant's N244 Extension Application [SIMS-L\_LIVE\_EMEA2.003165.003165-00032.FID2494481]

Dear Sheffield County Court

**(1) Sheffield Environmental Services Limited, (2) Veolia ES Sheffield Limited and (3) Veolia ES (UK) Limited v Persons Unknown**

**Claim Number: M10SE015 (formerly Claim No. KB-2025-LDS-000078)**

Further to our email below, in the interests of time we have arranged for additional hard copies of the N244 application and supporting documents to be sent to the Court. These have been delivered to the Court today. If the Court requires anything further in order for the application to be processed, please let us know.

We are happy to receive a sealed copy of the N244 Application Notice via email, should this be convenient for the Court.

Please do not hesitate to contact us should the Court have any further queries.

Yours faithfully

**Simmons & Simmons LLP**

**Tom Harris**

Associate, Disputes & Investigations  
Simmons & Simmons LLP

T +44 20 7825 3991

[Tom.Harris@simmons-simmons.com](mailto:Tom.Harris@simmons-simmons.com)

---

**From:** Hannah Barton <[Hannah.Barton@simmons-simmons.com](mailto:Hannah.Barton@simmons-simmons.com)>

**Sent:** 28 October 2025 10:29

**To:** Sheffield County, Enquiries <[enquiries.sheffield.countycourt@justice.gov.uk](mailto:enquiries.sheffield.countycourt@justice.gov.uk)>; Hussein, Danielle <[Danielle.Hussein@justice.gov.uk](mailto:Danielle.Hussein@justice.gov.uk)>

**Cc:** Jonathan Rukundo <[Jonathan.Rukundo@simmons-simmons.com](mailto:Jonathan.Rukundo@simmons-simmons.com)>; Frances Gourdie <[Frances.Gourdie@Simmons-Simmons.com](mailto:Frances.Gourdie@Simmons-Simmons.com)>; Robert Allen <[Robert.Allen@simmons-simmons.com](mailto:Robert.Allen@simmons-simmons.com)>; Tom Harris <[Tom.Harris@simmons-simmons.com](mailto:Tom.Harris@simmons-simmons.com)>

**Subject:** RE: M10SE015 - Claimant's N244 Extension Application [SIMS-L\_LIVE\_EMEA2.003165.003165-00032.FID2494481]

Dear Sheffield County Court,

**(1) Sheffield Environmental Services Limited, (2) Veolia ES Sheffield Limited and (3) Veolia ES (UK) Limited v Persons Unknown**

**Claim Number: M10SE015 (formerly Claim No. KB-2025-LDS-000078)**

Thank you for your email.

It is our understanding that, due to the nature of this claim and the Defendant(s) being "Persons Unknown", the Claimants are not required to serve copies of the application. Instead, pursuant to paragraph 10 of the Order of Mrs Justice Stacey dated 13 June 2025 (the "**Order**"), the Claimants are required to notify Persons Unknown by taking the following steps: (a) uploading a soft copy of the application to <https://sheffield.veolia.co.uk>, (b) emailing a soft copy of the application to [neiltodd@Thompsons.law](mailto:neiltodd@Thompsons.law), and (c) affixing a notice at the relevant sites stating that an application has been made and where it can be accessed online. A copy of the Order is attached for reference.

As the Claimants do not require hard copies for service, our understanding is that we only require a soft-copy of the sealed application notice so that we may notify that alongside the other soft copy documents.

In this regard, we should be grateful if the Court would confirm whether it can provide a sealed, soft-copy of the copy of the application notice that it has in hand (a copy of the Form N244 and continuation sheet are also attached for convenience), or whether it does still require additional copies of all of the application documents? If the later, we will duly provide the same.

Thank you for the note regarding the USB. We will ensure suitable devices are brought to the hearing.

Yours faithfully,

**Simmons & Simmons LLP**

**Hannah Barton**

Supervising Associate, Disputes & Investigations  
Solicitor Advocate (Higher Rights Civil)  
Simmons & Simmons LLP

**T** +44 20 7825 3857

**M** +44 7860 405520

[hannah.barton@simmons-simmons.com](mailto:hannah.barton@simmons-simmons.com)

---

**From:** Sheffield County, Enquiries <[enquiries.sheffield.countycourt@justice.gov.uk](mailto:enquiries.sheffield.countycourt@justice.gov.uk)>

**Sent:** 28 October 2025 09:11

**To:** Tom Harris <[Tom.Harris@simmons-simmons.com](mailto:Tom.Harris@simmons-simmons.com)>; Hussein, Danielle <[Danielle.Hussein@justice.gov.uk](mailto:Danielle.Hussein@justice.gov.uk)>

**Cc:** Hannah Barton <[Hannah.Barton@simmons-simmons.com](mailto:Hannah.Barton@simmons-simmons.com)>; Jonathan Rukundo <[Jonathan.Rukundo@simmons-simmons.com](mailto:Jonathan.Rukundo@simmons-simmons.com)>; Frances Gourdie <[Frances.Gourdie@Simmons-Simmons.com](mailto:Frances.Gourdie@Simmons-Simmons.com)>; Robert Allen <[Robert.Allen@simmons-simmons.com](mailto:Robert.Allen@simmons-simmons.com)>

**Subject:** Re: M10SE015 - Claimant's N244 Extension Application [SIMS-L\_LIVE\_EMEA2.003165.003165-00032.FID2494481]

Dear Sirs

Please be advised that the Court requires a minimum of 2 copies of the N244 application and supporting documents, one for the Court file, and one to return to you for service. For ease and to save costs, the Court will hold the copy of the N244 application you have sent, and therefore only require 1 further copy. We will process the application and fee upon receipt of the further copy.

Please also be advised that the Court cannot play the USB, and you must bring a device to the hearing to plug it into yourselves.



Kind Regards,

## Issue and Admin

Civil Issue and Admin Section | HMCTS | Sheffield County Court, The Law Courts, 50 West Bar, Sheffield S3 8PH

**Phone: 0300 123 5577**

**Web:** [www.gov.uk/hmcts](http://www.gov.uk/hmcts)



[Here is how HMCTS uses personal data about you](#)

---

**From:** Tom Harris <[Tom.Harris@simmons-simmons.com](mailto:Tom.Harris@simmons-simmons.com)>

**Sent:** 24 October 2025 11:20

**To:** Sheffield County, Enquiries <[enquiries.sheffield.countycourt@justice.gov.uk](mailto:enquiries.sheffield.countycourt@justice.gov.uk)>; Hussein, Danielle <[Danielle.Hussein@justice.gov.uk](mailto:Danielle.Hussein@justice.gov.uk)>

**Cc:** Hannah Barton <[Hannah.Barton@simmons-simmons.com](mailto:Hannah.Barton@simmons-simmons.com)>; Jonathan Rukundo <[Jonathan.Rukundo@simmons-simmons.com](mailto:Jonathan.Rukundo@simmons-simmons.com)>; Frances Gourdie <[Frances.Gourdie@Simmons-Simmons.com](mailto:Frances.Gourdie@Simmons-Simmons.com)>; Robert Allen <[Robert.Allen@simmons-simmons.com](mailto:Robert.Allen@simmons-simmons.com)>

**Subject:** RE: M10SE015 - Claimant's N244 Extension Application [SIMS-L\_LIVE\_EMEA2.003165.003165-00032.FID2494481]

Dear Civil Orders and Listing Team

**(1) Sheffield Environmental Services Limited, (2) Veolia ES Sheffield Limited and (3) Veolia ES (UK) Limited v Persons Unknown**

**Claim Number: M10SE015 (formerly Claim No. KB-2025-LDS-000078)**

We act for the Claimants in the above matter.

Thank you for your email below. We confirm hard copy documents of the application have been delivered to the Court today.

If there are any issues or if the Court requires any further information, please do not hesitate to contact us.

Yours faithfully

**Simmons & Simmons LLP**

**Tom Harris**

Associate, Disputes & Investigations  
Simmons & Simmons LLP

T +44 20 7825 3991

[Tom.Harris@simmons-simmons.com](mailto:Tom.Harris@simmons-simmons.com)

---

**From:** Sheffield County, Enquiries <[enquiries.sheffield.countycourt@justice.gov.uk](mailto:enquiries.sheffield.countycourt@justice.gov.uk)>

**Sent:** 23 October 2025 08:36

**To:** Tom Harris <[Tom.Harris@simmons-simmons.com](mailto:Tom.Harris@simmons-simmons.com)>

**Subject:** RE: M10SE015 - Claimant's N244 Extension Application [SIMS-L\_LIVE\_EMEA2.003165.003165-00032.FID2494481]

Good morning,

Please be advised the court have received your application and supporting documents. However, the e-mail exceeds 10 megabytes and/or the attachment is more than 50 pages the limits have been exceeded and the Court is unable to accept the e-mail and/or attachments.

- When printed out, the email and any attachments, including any document embedded in another, together with sufficient copies for service on the required parties, the process or accompanying attachments do not exceed 50 pages for Civil and Family cases (excluding Local Authorities, Cafcass and Cafcass CYMRU for Family Cases).
- A page is one side, therefore 50 pages equals 25 pieces of paper printed on both sides
- The total size of an email, including any attachments, must not exceed 10 megabytes.
- A party must not use more than one email to take any step in a claim which requires a document or documents to be filed.

Please resubmit required number of copies by hard copy.

Yours Faithfully,

**Civil Orders and Listing Team**

Sheffield Combined Court

Phone: 0300 123 5577

Web: [www.gov.uk/hmcts](http://www.gov.uk/hmcts)

HMCTS | Sheffield Combined Court | 50 West Bar Sheffield | S3 8PH | DX 703028

---

**From:** Tom Harris <[Tom.Harris@simmons-simmons.com](mailto:Tom.Harris@simmons-simmons.com)>

**Sent:** 22 October 2025 17:05

**To:** Sheffield County, Enquiries <[enquiries.sheffield.countycourt@justice.gov.uk](mailto:enquiries.sheffield.countycourt@justice.gov.uk)>

**Cc:** Frances Gourdie <[Frances.Gourdie@Simmons-Simmons.com](mailto:Frances.Gourdie@Simmons-Simmons.com)>; Hannah Barton <[Hannah.Barton@simmons-simmons.com](mailto:Hannah.Barton@simmons-simmons.com)>; Jonathan Rukundo <[Jonathan.Rukundo@simmons-simmons.com](mailto:Jonathan.Rukundo@simmons-simmons.com)>; Robert Allen <[Robert.Allen@simmons-simmons.com](mailto:Robert.Allen@simmons-simmons.com)>

**Subject:** M10SE015 - Claimant's N244 Extension Application [SIMS-L\_LIVE\_EMEA2.003165.003165-00032.FID2494481]

To whom it may concern

**(1) Sheffield Environmental Services Limited, (2) Veolia ES Sheffield Limited and (3) Veolia ES (UK) Limited v Persons Unknown**

**Claim Number: M10SE015 (formerly Claim No. KB-2025-LDS-000078)**

We act for the Claimants in the above matter.

Please see attached letter and enclosed N244 Application documents for filing. Copies of the supporting witness statements and exhibits are enclosed by way of the following secure link: <https://simmons-simmons.sharefile.eu/d-sd6c972448f93458fb99fc1f2a690362c> (the password will be provided in a separate email).

Please note that the exhibits to the Witness Statement of Dean Anthony Ford (Exhibit DAF1) and Sophie Joy Garraty (Exhibit SJG1) contain video evidence. The PDF copies of these exhibits contain slipsheets for the video evidence, and the video evidence itself is contained in zipped folders for each exhibit.

**We authorise withdrawal of funds totalling £313.00, being the requisite filing fee, from PBA account number 0087876.**

We are arranging for hard copies of the application and supporting evidence to be filed with the Court.

If you have any questions, please contact us on the details below.

Yours faithfully

**Simmons & Simmons LLP**

**Tom Harris**

Associate, Disputes & Investigations  
Simmons & Simmons LLP

T +44 20 7825 3991

[Tom.Harris@simmons-simmons.com](mailto:Tom.Harris@simmons-simmons.com)

This email is sent on behalf of Simmons & Simmons LLP Aurora, Finzels Reach, Counterslip, Bristol BS1 6BX United Kingdom T +44 20 7628 2020 [simmons-simmons.com](http://simmons-simmons.com). Simmons & Simmons LLP is a limited liability partnership registered in England & Wales with number OC352713 and with its registered office at Citypoint, 1 Ropemaker Street, London EC2Y 9SS, United Kingdom. It is authorised and regulated by the Solicitors Regulation Authority and its SRA ID number is 533587. The word "partner" refers to a member of Simmons & Simmons LLP or one of its affiliates, or an employee or consultant with equivalent standing. A list of members and other partners together with their professional qualifications is available for inspection at the above address.

The content of this email and any attachments ("the email") is confidential, may be privileged, is subject to copyright and may be read, copied and used only by the intended recipient. If you are not the intended recipient please notify us by return email or telephone and erase all copies and do not disclose the email or any part of it to any person. We monitor email communications through our networks for regulatory compliance purposes and to protect our clients, employees and business. We may record and process your personal information such as your email address and other information contained in your signature block. By communicating with us, you acknowledge and where necessary consent to our processing of your personal information as stated above. If we collect and use your personal data we will use it in accordance with our privacy notice, which is available on our website.

For regulatory information on the extent to which we are permitted to carry out insurance mediation, and other investment activities, and also for information related to our privacy policy and complaints, visit the legal and regulatory section of our website.

If you wish to set preferences for the way in which we process your personal data, please visit the privacy page on our website.

Simmons & Simmons is a Carbon Neutral+ organisation. Please consider your carbon emissions before you print this email.

---

This e-mail and any attachments is intended only for the attention of the addressee(s). Its unauthorised use, disclosure, storage or copying is not permitted. If you are not the intended recipient, please destroy all copies and inform the sender by return e-mail. Internet e-mail is not a secure medium. Any reply to this message could be intercepted and read by someone else. Please bear that in mind when deciding whether to send material in response to this message by e-mail. This e-mail (whether you are the sender or the recipient) may be monitored, recorded and retained by the Ministry of Justice. Monitoring / blocking software may be used, and e-mail content may be read at any time. You have a responsibility to ensure laws are not broken when composing or forwarding e-mails and their contents.

---

This e-mail and any attachments is intended only for the attention of the addressee(s). Its unauthorised use, disclosure, storage or copying is not permitted. If you are not the intended recipient, please destroy all copies and inform the sender by return e-mail. Internet e-mail is not a secure medium. Any reply to this message could be intercepted and read by someone else. Please bear that in mind when deciding whether to send material in response to this message by e-mail. This e-mail (whether you are the sender or the recipient) may be monitored, recorded and retained by the Ministry of Justice. Monitoring / blocking software may be used, and e-mail content may be read at any time. You have a responsibility to ensure laws are not broken when composing or forwarding e-mails and their contents.

---

This e-mail and any attachments is intended only for the attention of the addressee(s). Its unauthorised use, disclosure, storage or copying is not permitted. If you are not the intended recipient, please destroy all copies and inform the sender by return e-mail. Internet e-mail is not a secure medium. Any reply to this message could be intercepted and read by someone else. Please bear that in mind when deciding whether to send material in response to this message by e-mail. This

e-mail (whether you are the sender or the recipient) may be monitored, recorded and retained by the Ministry of Justice. Monitoring / blocking software may be used, and e-mail content may be read at any time. You have a responsibility to ensure laws are not broken when composing or forwarding e-mails and their contents.

**From:** Sheffield County, Enquiries <enquiries.sheffield.countycourt@justice.gov.uk>  
**Sent:** 18 November 2025 13:05  
**To:** Tom Harris  
**Cc:** Jonathan Rukundo; Frances Gourdie; Robert Allen; Hannah Barton; Claire Rhodes  
**Subject:** RE: M10SE015 - Claimant's N244 Extension Application [SIMS-L\_LIVE\_EMEA2.003165.003165-00032.FID2494481]  
**Attachments:** m10se015.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Good afternoon,

Please see attached hearing notice and sealed application for service.

The matter is listed on 5 December 2025 at 10am before HHJ Baddeley.

Please confirm receipt of this email.

Kind regards,

Danielle  
Civil Listing and appeals  
HMCTS | Sheffield County Court, The Law Courts, 50 West Bar, Sheffield S3 8PH  
Web: [www.gov.uk/hmcts](http://www.gov.uk/hmcts)  
Tel: 0300 123 5577  
[Here is how HMCTS uses personal data about you](#)



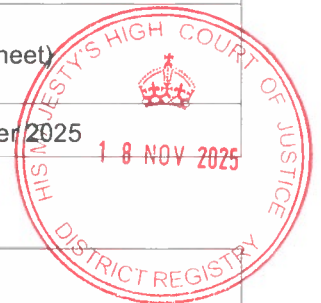
**Application notice**

High Court of Justice, King's Bench Division, Sheffield District Registry

For help in completing this form please read the notes for guidance form N244Notes.

Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form: <https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>

<b>Name of court</b>	<b>Claim no.</b>
	M10SE015
<b>Fee account no.</b> (if applicable)	<b>Help with Fees – Ref. no.</b> (if applicable)
PBA0087876	<b>H W F</b> - <input type="text"/> <input type="text"/> - <input type="text"/> <input type="text"/>
<b>Warrant no.</b> (if applicable)	
<b>Claimant's name</b> (including ref.) (1) Sheffield Environmental Services Limited; (2) Veolia ES Sheffield Limited; (3) Veolia ES (UK) Limited (003165-00032)	
<b>Defendant's name</b> (including ref.) Persons Unknown (see attached sheet)	
<b>Date</b>	22 October 2025



1. What is your name or, if you are a legal representative, the name of your firm?

Simmons & Simmons LLP

2. Are you a ☐ Claimant ☐ Defendant ☒ Legal Representative  
☐ Other (please specify)

If you are a legal representative whom do you represent?

Claimants

3. What order are you asking the court to make and why?

The order of Mrs Justice Stacey on 13 June 2025 grants an injunction to the Claimants until 13 December 2025. The Claimants seek an order extending the injunction until 13 June 2026.

4. Have you attached a draft of the order you are applying for? ☒ Yes ☐ No
5. How do you want to have this application dealt with? ☒ at a hearing ☐ without a hearing  
☐ at a remote hearing
6. How long do you think the hearing will last?  3 Hours  Minutes  
 Is this time estimate agreed by all parties? ☐ Yes ☒ No
7. Give details of any fixed trial date or period  N/a
8. What level of Judge does your hearing need?  High Court Judge
9. Who should be served with this application?  N/a
- 9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.  N/a

10. What information will you be relying on, in support of your application?

- ☒ the attached witness statement
- ☒ the statement of case
- ☐ the evidence set out in the box below

If necessary, please continue on a separate sheet.

11. Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

☐ Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.

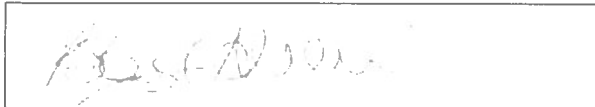
☒ No

## Statement of Truth

I understand that proceedings for contempt of court may be brought against a person 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.

- ☐ I **believe** that the facts stated in section 10 (and any continuation sheets) are true.
- ☒ **The applicant believes** that the facts stated in section 10 (and any continuation sheets) are true. **I am authorised** by the applicant to sign this statement.

### Signature



- ☐ Applicant
- ☐ Litigation friend (where applicant is a child or a Protected Party)
- ☒ Applicant's legal representative (as defined by CPR 2.3(1))

### Date

Day	Month	Year
2 2	1 0	2 0 2 5

### Full name

Robert Charles Kinkead Allen

### Name of applicant's legal representative's firm

Simmons & Simmons LLP

If signing on behalf of firm or company give position or office held

Partner

Applicant's address to which documents should be sent.

Building and street

Citypoint, 1 Ropemaker Street

Second line of address

Town or city

London

County (optional)

Postcode

E	C	2	Y	9	S	S
---	---	---	---	---	---	---

If applicable

Phone number

020 7628 2020

Fax phone number

DX number

Your Ref.

003165-00032

Email

Robert.Allen@simmons-simmons.com



## **Continuation sheet: N244 application form**

### **Claimant's name**

- (1) Sheffield Environmental Services Limited
- (2) Veolia ES Sheffield Limited
- (3) Veolia ES (UK) Limited

### **Defendant's name**

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, the following sites:

- (a) Lumley Street Depot, Lumley Street, Sheffield, S4 7ZJ (as shown for identification edged red on the attached Plan 1)
- (b) Lumley Street Workshop, Lumley Street, Sheffield, S4 7ZJ (as shown for identification edged red on the attached Plan 2)
- (c) The Energy Recovery Facility at Bernard Road, Sheffield, S4 7YX (as shown for identification edged red but excluding that area of land shaded purple on the attached Plan 3)
- (d) Land at 93 Tinsley Park Road, Sheffield, S9 5DL (as shown for identification edged red on the attached Plan 4)
- (e) Land at Crown Works, Rotherham Road, Beighton, Sheffield, S20 1AH (as shown for identification edged red on the attached Plan 5)

## Notice of Claimants application dated

In the High Court of Justice  
King's Bench Division  
Sheffield  
District Registry

Claim Number	M10SE015
Date	18 November 2025



SHEFFIELD ENVIRONMENTAL SERVICES LIMITED	1 <sup>st</sup> Claimant Ref
VEOLIA ES SHEFFIELD LIMITED	2 <sup>nd</sup> Claimant Ref
VEOLIA ES (UK) LIMITED	3 <sup>rd</sup> Claimant Ref
PERSONS UNKOWN	1 <sup>st</sup> Defendant Ref

TAKE NOTICE that the Claimants application dated will 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

3 hours has been allowed for the Claimants application dated

**Please Note:** This case may be released to another Judge, possibly at a different Court

**This is an attended hearing**

Any documents filed at Court in relation to this hearing should be clearly marked with the hearing date and time to ensure that they are dealt with as a priority.

Only documents that are urgent should be faxed to the Court.

**If documents are filed by fax or email, please DO NOT file a hard copy.**

Sheffield County Court offers you a specific email address providing a direct and helpful service:

[enquiries.sheffield.countycourt@justice.gov.uk](mailto:enquiries.sheffield.countycourt@justice.gov.uk)

Please refer to: PRACTICE DIRECTION 5B – ELECTRONIC COMMUNICATION AND FILING OF DOCUMENTS, for the filing of documents by way of email.

Any documents filed at Court in relation to this hearing should be clearly marked with the hearing date and time to ensure that they are dealt with as a priority.

The court office at Sheffield District Registry, The Law Courts, 50 West Bar, Sheffield, S3 8PH. When corresponding with the court, please address forms or letters to the Court Manager and quote the claim number. Tel: 01142812400 Fax: 01264 347961. Check if you can issue your claim online. It will save you time and money. Go to [www.moneyclaim.gov.uk](http://www.moneyclaim.gov.uk) to find out more.

**Please note:** YOU WILL BE SUBJECT TO SECURITY SEARCHES ON ARRIVAL AT THE COURT BUILDING. IN ORDER TO AVOID MISSING YOUR APPOINTMENT IT IS ADVISED THAT YOU ARRIVE 30 MINUTES BEFORE YOUR APPOINTMENT IS DUE TO START.

**General Data Protection Regulations**

To obtain information and guidance on how we treat your personal information and how to check what details we hold about you at HM Courts and Tribunals Service please go to:

[www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter](http://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter).

If you require a hard copy the HMCTS Privacy Notice please contact your Local Court who can provide one on request:

<https://courttribunalfinder.service.gov.uk/search/postcode>

**From:** Hannah Barton  
**Sent:** 18 November 2025 16:29  
**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:** 2025.10.22 Sealed Application Notice (Sealed on 18 November 2025) (106698296.1).pdf; 2025.10.22 - M10SE015 - Draft Order (Extension Application) (106402395.1).docx; 2025.11.18 Hearing Notice(106698298.1).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**

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)  
Simmons & Simmons LLP

**T** +44 20 7825 3857  
**M** +44 7860 405520  
[hannah.barton@simmons-simmons.com](mailto:hannah.barton@simmons-simmons.com)



29 September 2025

Joseph Diviney  
[JDiviney1@sheffield.ac.uk](mailto:JDiviney1@sheffield.ac.uk)

Our ref SPS/003165-00032

**By Email**

Dear Mr Diviney

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

1. We act for Sheffield Environmental Services Limited, Veolia ES Sheffield Limited and Veolia ES (UK) Limited (together, "Veolia" or "our clients") in respect of the above-captioned proceedings.
2. As you are aware, our clients obtained an Injunction in the High Court of Justice, on 13 June 2025, in respect of five Veolia sites in Sheffield (the "Injunction"). The terms of the Injunction prohibit anyone from blocking or obstructing the entering or exiting of vehicles to or from Veolia's land (as shown edged in red on the Plans in Schedule 1 of the enclosed Injunction order) in support of strikes organised by Unite the Union and without Veolia's consent.
3. We write because our clients have reason to believe that, on 19 August 2025, you blocked and/or obstructed the exiting of a vehicle from Veolia's land at Lumley Street Depot, Lumley Street, Sheffield, S4 7ZJ (the "Depot"), in support of strikes organised by Unite the Union and without Veolia's consent, in breach of the Injunction.
4. You have had notice of the Injunction through the steps in paragraph 9 of the Injunction, and you have been made aware of the Injunction as explained in paragraph 8 below. Our clients have continued to monitor that the Injunction and the warning notices are affixed and legible.
5. We must remind you that the Injunction starts with a penal notice, confirming that if you breach the terms of the Injunction, "**you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized**". This is a formal and explicit warning by the High Court to anybody who commits acts which breach the Injunction, including you.
6. Our clients respect your right to peacefully protest and to support Unite in its trade union recognition dispute involving the GMB union. However, that does not permit anyone to breach the terms of the Injunction. You have been identified as blocking or obstructing the exiting of a vehicle at the Depot on 19 August 2025 as set out below.

For details of our international offices please visit [www.simmons-simmons.com](http://www.simmons-simmons.com)

Simmons & Simmons LLP is a limited liability partnership registered in England & Wales with number OC352713 and with its registered office and principal place of business at Citypoint, 1 Ropemaker Street, London EC2Y 9SS. It is authorised and regulated by the Solicitors Regulation Authority and its SRA ID number is 533587. The word "partner" refers to a member of Simmons & Simmons LLP or one of its affiliates, or an employee or consultant with equivalent standing. A list of members and other partners together with their professional qualifications is available for inspection at the above address.

7. You may not have realised the consequences of your actions nor that you could have placed yourself at risk of imprisonment, a fine or some other penalty for contempt of court. The purpose of this letter is, therefore, to put you on notice that our clients have reason to believe that your conduct has breached the terms of the Injunction and give you an opportunity to avoid further action. For your own benefit, this is a warning that if you again block or obstruct vehicles from exiting the site, our clients may serve you with an application for the Court to commit you for contempt of court.

**A: Your awareness of the Injunction**

8. Our clients personally notified you by email on 7 July 2025 in response to the article in the Socialist Worker newspaper announcing that there would be a “mass picket” at the Depot. Our clients explained that Veolia had obtained an Injunction and provided you with access to the Injunction and related documentation via a link to the Sheffield Veolia website. Our clients expressly explained to you that you were prohibited from, amongst other things, *“blocking or obstructing the exiting or entering of any other individual or vehicle to or from the sites protected by the Injunction where done in support of the strikes organised by Unite and without Veolia’s consent”*, and that you were prohibited from doing such actions by yourself or by means of another person acting on your behalf or instructions. A copy of the email is enclosed.
9. On 9 July 2025, you attended a mass picket at the Depot. In footage uploaded to Youtube by DonkeyDave269 (the “July Youtube Footage”<sup>1</sup>), you demonstrate your awareness of the Injunction proceedings by reading from the transcript of the Injunction hearing.<sup>2</sup>

**B: Evidence of breaches of the Injunction**

10. You are shown blocking or obstructing the exiting of vehicles from the Depot on 19 August 2025 in CCTV footage (the “CCTV Footage”), footage from the first refuse collection vehicle that you blocked from exiting the Depot (the “Dashcam Footage”), and a video of the August Mass Picket uploaded to YouTube by DonkeyDave269 (the “August Youtube Footage”<sup>3</sup>) (together, the “Footage”). Copies of the CCTV Footage and the Dashcam Footage are enclosed to this letter by way of a zipped folder in a secure file transfer protocol link.<sup>4</sup> The Footage was taken between approximately 6:30 am and 9:30 am. We have extracted still images from the Footage to include in this letter, which will also be exhibited as part of any future contempt application to Court (should it be necessary).
11. You together with others obstructed the first refuse collection vehicle (“RCV”) which sought to leave the Depot from exiting at approximately 6:45 am.
12. In the Footage, you were identified as wearing black trousers, a light-coloured top, a black jacket with a yellow badge, and a dark-coloured baseball cap. You were also carrying and using a black megaphone. By way of example, you are clearly identifiable in the August Youtube Footage:

---

<sup>1</sup> July Youtube Footage, <https://www.youtube.com/watch?v=HBYbIkrenX0> (accessed on 26 September 2025).

<sup>2</sup> July Youtube Footage at 39 mins.

<sup>3</sup> August Youtube Footage, <https://www.youtube.com/watch?v=vgEQrEre424> (accessed on 26 September 2025)

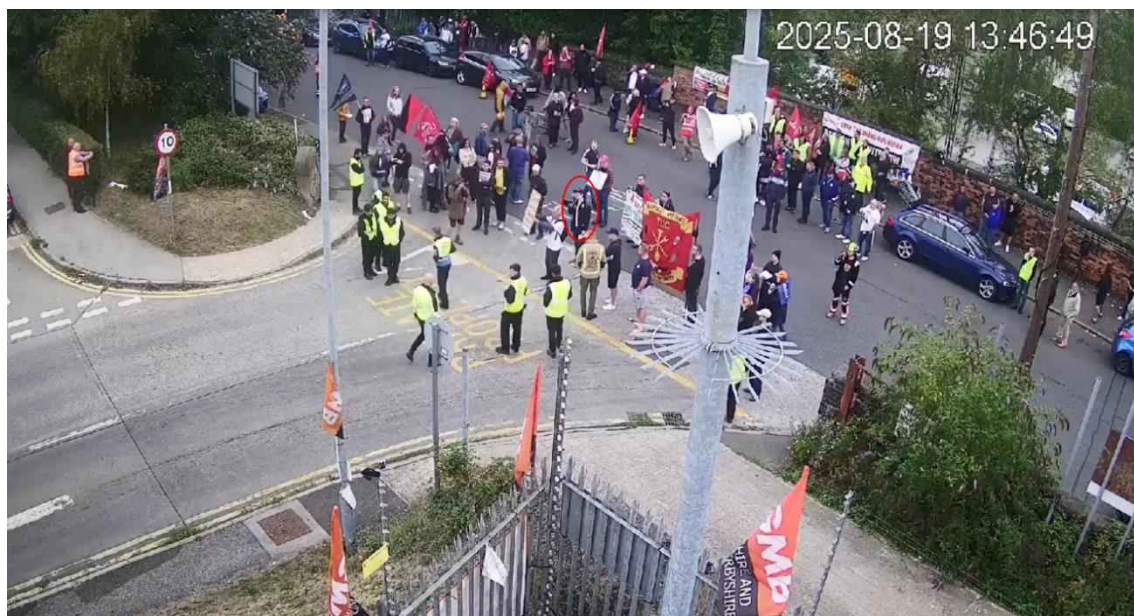
<sup>4</sup> The password to access the zipped folder is Q7vRp1XzNt.



**Image 1: Screenshot of August Youtube Footage at 18:52 mins**

13. Set out below are a series of still images from the Footage, which depict you blocking/obstructing the RCV that attempted to exit the Depot:

(A) At 6:47 am,<sup>5</sup> you can be seen from the CCTV Footage standing in the exit lane and speaking into the megaphone as the RCV prepares to leave. You are standing directly in front of the pathway of the RCV at precisely the time that they start to leave the Depot (usually at 6:45 am).



**Image 2: Screenshot of CCTV Footage on 19 August 2025 at 06:46:49**

(B) The first RCV stopped a few metres before the private property line due to the presence of you and other protestors in its pathway. In the Dashcam Footage you

<sup>5</sup> Please note that the timestamp on the CCTV Footage from the premises is 7 hours ahead.



can be seen standing in the exit lane of the Depot, directly obstructing the RCV between 06:47:00 and 06:48:09.



**Image 3: Screenshot of Dashcam Footage on 19 August 2025 at 06:47:00**

- (C) In the August Youtube Footage, you can also be seen standing directly in the pathway of the first RCV.



**Image 4: Screenshot of August Youtube Footage at 13:48 mins.**

- (D) As the first RCV resumed its attempt to exit between 6:48 am and 6:49 am, you continued to obstruct its pathway by standing in the exit lane (or at the midpoint between the exit and entrance lanes of the Depot), thus standing either directly in the path of the RCV or too close to permit safe passage of the RCV. In the Dashcam Footage, you can be seen obstructing the pathway of the RCV whilst it is moving at 2 mph at 06:48:15.





**Image 5: Screenshot of Dashcam Footage on 19 August 2025 at 06:48:15**

- (E) The first RCV paused again at 06:48:35, after which you then approached the RCV to speak to the driver, as can be seen in the August Youtube Footage<sup>6</sup> and in the CCTV Footage. The RCV was not able to proceed forward and turn right out of the Depot as you were obstructing its passage and it would have been clearly an immediate danger to you and others had it proceeded forward.



**Image 6: Screenshot of CCTV Footage on 19 August 2025 at 06:49:00**

- (F) Your continued obstruction can also be seen in the August Youtube Footage at 15:26 mins.

<sup>6</sup> Between 15.52 mins and 16.09 mins.



**Image 7: Screenshot of August Youtube Footage at 15:26 mins**

- (G) Due to your actions with those of others, our clients had to instruct the RCV to reverse away from the private property line for safety reasons and it was unable to exit the premises. At 06:49:28, the RCV can be seen reversing in behind the private property line in the Dashcam Footage.



**Image 8: Screenshot of the Dashcam Footage on 19 August 2025 at 06:49:28**

- (H) The reversal of the RCV was met with cheers by the protestors.<sup>7</sup>

14. The RCVs were unable to start to leave the Depot until 9:02 am.

<sup>7</sup> Between 15:51 and 16:10 mins of the August Youtube Footage.



**C: Conclusion**

15. As set out above, our clients have reason to believe that your conduct on 19 August 2025 breached the Injunction on the basis that you blocked and/or obstructed vehicles from exiting the Depot.
16. As you may not have fully understood the consequences of your actions, our clients are minded not to make a contempt application at this stage. However we want to make absolutely clear that should you engage in any further conduct that breaches the Injunction, our clients reserve the right to issue and serve an application against you on the grounds outlined above, and any other relevant grounds, as well as making an application for costs.
17. You may wish to seek independent legal advice in relation to the contents of this letter and the proper steps that you should take to avoid a potential application for contempt of court. Please acknowledge receipt of this letter by emailing [reputation@simmons-simmons.com](mailto:reputation@simmons-simmons.com) to confirm that it has been received.

Yours faithfully

*Simmons + Simmons LLP*

**Simmons & Simmons LLP**

*Enc.*

29 September 2025

Alistair Tice  
[alistairtice@yahoo.co.uk](mailto:alistairtice@yahoo.co.uk)

Our ref SPS/003165-00032

**By Email**

Dear Mr Tice

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

1. We act for Sheffield Environmental Services Limited, Veolia ES Sheffield Limited and Veolia ES (UK) Limited (together, "Veolia" or "our clients") in respect of the above-captioned proceedings.
2. As you are aware, our clients obtained an Injunction in the High Court of Justice, on 13 June 2025, in respect of five Veolia sites in Sheffield (the "Injunction"). The terms of the Injunction prohibit anyone from blocking or obstructing the entering or exiting of vehicles to or from Veolia's land (as shown edged in red on the Plans in Schedule 1 of the enclosed Injunction order) in support of strikes organised by Unite the Union and without Veolia's consent.
3. We write because our clients have reason to believe that, on 19 August 2025, you blocked and/or obstructed the exiting of a vehicle from Veolia's land at Lumley Street Depot, Lumley Street, Sheffield, S4 7ZJ (the "Depot"), in support of strikes organised by Unite the Union and without Veolia's consent, in breach of the Injunction.
4. You have had notice of the Injunction through the steps in paragraph 9 of the Injunction, and you have been made aware of the Injunction as explained in paragraph 8 below. Our clients have continued to monitor that the Injunction and the warning notices are affixed and legible.
5. We must remind you that the Injunction starts with a penal notice, confirming that if you breach the terms of the Injunction, "**you may be held to be in contempt of court and may be imprisoned, fined or have your assets seized**". This is a formal and explicit warning by the High Court to anybody who commits acts which breach the Injunction, including you.
6. Our clients respect your right to peacefully protest and to support Unite in its trade union recognition dispute involving the GMB union. However, that does not permit anyone to

For details of our international offices please visit [www.simmons-simmons.com](http://www.simmons-simmons.com)

Simmons & Simmons LLP is a limited liability partnership registered in England & Wales with number OC352713 and with its registered office and principal place of business at Citypoint, 1 Ropemaker Street, London EC2Y 9SS. It is authorised and regulated by the Solicitors Regulation Authority and its SRA ID number is 533587. The word "partner" refers to a member of Simmons & Simmons LLP or one of its affiliates, or an employee or consultant with equivalent standing. A list of members and other partners together with their professional qualifications is available for inspection at the above address.

breach the terms of the Injunction. You have been identified as blocking or obstructing the exiting of a vehicle at the Depot on 19 August 2025 as set out below.

7. You may not have realised the consequences of your actions nor that you could have placed yourself at risk of imprisonment, a fine or some other penalty for contempt of court. The purpose of this letter is, therefore, to put you on notice that our clients have reason to believe that your conduct has breached the terms of the Injunction and give you an opportunity to avoid further action. For your own benefit, this is a warning that if you again block or obstruct vehicles from exiting the site, our clients may serve you with an application for the Court to commit you for contempt of court.

**A: Your awareness of the Injunction**

8. Our clients personally notified you by email on 7 July 2025 in response to the article in the Socialist Worker newspaper announcing that there would be a “mass picket” at the Depot. Our clients explained that Veolia had obtained an Injunction and provided you with access to the Injunction and related documentation via a link to the Sheffield Veolia website. Our clients expressly explained to you that you were prohibited from, amongst other things, *“blocking or obstructing the exiting or entering of any other individual or vehicle to or from the sites protected by the Injunction where done in support of the strikes organised by Unite and without Veolia’s consent”*, and that you were prohibited from doing such actions by yourself or by means of another person acting on your behalf or instructions. A copy of the email is enclosed.
9. In any event, your awareness of the Injunction can be demonstrated by the sign you held up on 19 August 2025 at the Depot which stated *“Please slow as per injunction”*.

**B: Evidence of breaches of the Injunction**

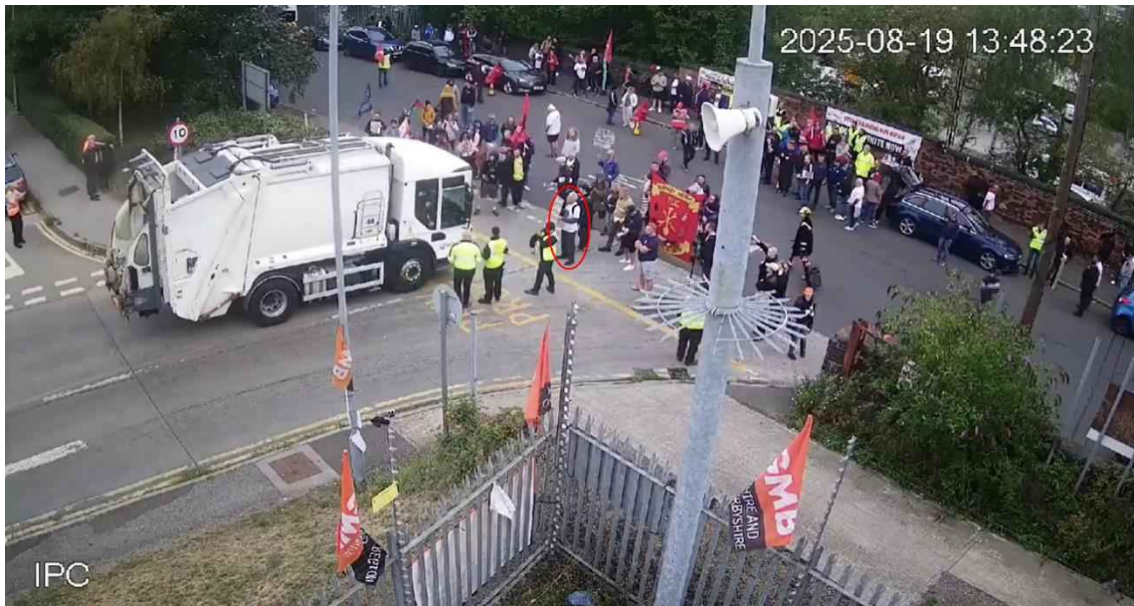
10. You are shown blocking or obstructing the entering or exiting of vehicles from the Depot on 19 August 2025 in CCTV footage (the “CCTV Footage”), footage from the first refuse collection vehicle that you blocked from exiting the Depot (the “Dashcam Footage”), and a video of the August Mass Picket uploaded to YouTube by DonkeyDave269 (the “Youtube Footage”) (together, the “Footage”). Copies of the CCTV Footage and the Dashcam Footage are enclosed to this letter by way of a zipped folder in a secure file transfer protocol link.<sup>2</sup> The Footage was taken between approximately 6:30 am and 9:30 am. We have extracted still images from the Footage to include in this letter, which will also be exhibited as part of any future contempt application to Court (should it be necessary).
11. You together with others obstructed the first refuse collection vehicle (“RCV”) which sought to leave the Depot from exiting at approximately 6:45 am.
12. In the Footage, you were identified wearing a light blue t-shirt over a dark long sleeve t-shirt and wearing a backpack. You were also carrying a distinctive cardboard sign.
13. Set out below are a series of still images from the Footage, which depict you blocking/obstructing the RCV that attempted to exit the Depot:
  - (A) In the first CCTV image, you can be seen holding a cardboard sign stood directly in front of the RCV as it attempted to leave:

---

<sup>1</sup> <https://www.youtube.com/watch?v=vgEQrEre424> (accessed on 26 September 2025)

<sup>2</sup> The password to access the zipped folder is Q7vRp1XzNt.





**Image 1: Screenshot of CCTV Footage on 19 August 2025 at 06:48:23**

- (B) In the second image, from the front of the RCV, you can be seen obstructing the RCV and your cardboard sign can be seen and states, “Please slow as per injunction, take a flyer, talk to picket, solidarity” (emphasis added). The RCV was not able to proceed forward and turn right out of the Depot as you were obstructing its passage and it would have been clearly an immediate danger to you and others had it proceeded forward.



**Image 2: Screenshot of Dashcam Footage on 19 August 2025 at 06:48:15**

- (C) After standing in front of the RCV, the screenshots from the YouTube Footage show that you approached the cab of the first RCV. You obstructed the driver’s view from the side window with your sign, preventing the driver from safely moving the vehicle. Due to your actions with those of others, our clients had to instruct the RCV to reverse away from the private property line for safety reasons and it was unable to exit the premises.



**Image 3: Screenshot of 19 August 2025 Youtube Footage at 15:36 mins**



**Image 4: Screenshot of 19 August 2025 Youtube Footage at 15:42 mins**

- (D) Further, and between approximately 8:45am and 9:30am, you with a group of approximately 8 individuals prevented another RCV from turning right out of the Depot. You stood in front of the RCV at close proximity which prevented the driver from safely moving the RCV before handing him a leaflet.

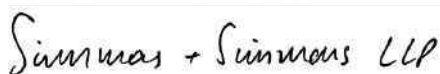
14. The RCVs were unable to start to leave the Depot until 9:02 am.

15. On 20 August 2025, you wrote in an article<sup>3</sup> for the Socialist Party website which said that *“despite a High Court Injunction, strike supporters exercised their right to ask drivers to stop, take a leaflet, have a conversation. The first wagon due out didn’t try to leave the depot, and all the refuse trucks were delayed by two hours, giving the strikers a huge boost”*. The Footage shows that your article is false as the first RCV did, indeed, try to exit the Depot and was obstructed from doing so safely by the actions of you and others.

**C: Conclusion**

16. As set out above, our clients have reason to believe that your conduct on 19 August 2025 breached the Injunction on the basis that you blocked and/or obstructed vehicles from exiting the Depot.
17. As you may not have fully understood the consequences of your actions, our clients are minded not to make a contempt application at this stage. However we want to make absolutely clear that should you engage in any further conduct that breaches the Injunction, our clients reserve the right to issue and serve an application against you on the grounds outlined above, and any other relevant grounds, as well as making an application for costs.
18. You may wish to seek independent legal advice in relation to the contents of this letter and the proper steps that you should take to avoid a potential application for contempt of court. Please acknowledge receipt of this letter by emailing [reputation@simmons-simmons.com](mailto:reputation@simmons-simmons.com) to confirm that it has been received.

Yours faithfully



**Simmons & Simmons LLP**  
*Enc.*

---

<sup>3</sup> <https://www.socialistparty.org.uk/articles/142053/20-08-2025/sheffield-veolia-bin-strikers-one-year-on-and-still-fighting/> (accessed on 26 September 2025).