

Filed on behalf of the Applicant

Witness Statement of Simon Knapp

Statement No. 1

Date: 22 May 2023

**IN THE HIGH COURT OF JUSTICE
THE BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES
CHANCERY DIVISION
BETWEEN:**

JOCKEY CLUB RACECOURSES LIMITED

Applicant

-and-

- (1) DANIEL FRANK PETER KIDBY**
- (2) PERSONS UNKNOWN INTENTIONALLY OBSTRUCTING THE 7 HORSE RACES ON 2 JUNE 2023 AND 8 HORSE RACES ON 3 JUNE 2023 AT THE LOCATION DESCRIBED BELOW AS THE "EPSOM RACECOURSE"**
- (3) PERSONS UNKNOWN ENTERING THE AREA DESCRIBED BELOW AS THE "RACE TRACK" EXCEPT AT SPECIFIC "CROSSING POINTS" AND WITH "AUTHORISATION", AS DESCRIBED BELOW**
- (4) PERSONS UNKNOWN ENTERING AND/OR REMAINING ON ANY "CROSSING POINTS" WITHOUT "AUTHORISATION", AS DESCRIBED BELOW**
- (5) [PERSONS UNKNOWN INTENTIONALLY CAUSING ANY OBJECT TO ENTER ONTO THE "RACE TRACK" WITHOUT "AUTHORISATION", AS DESCRIBED BELOW**
- (6) PERSONS UNKNOWN ENTERING THE AREA DESCRIBED BELOW AS THE "PARADE RING" WITHOUT "AUTHORISATION", AS DESCRIBED BELOW**
- (7) PERSONS UNKNOWN ENTERING AND/OR REMAINING ON ANY PART OF THE AREAS DESCRIBED BELOW AS THE "HORSES' ROUTE TO THE PARADE RING" AND/OR THE "HORSES' ROUTE TO THE RACE START", WITHOUT "AUTHORISATION", AS DESCRIBED BELOW**
- (8) PERSONS UNKNOWN INTENTIONALLY ENDANGERING ANY PERSON AT THE LOCATION DESCRIBED BELOW AS THE "EPSOM RACECOURSE"**

Respondents

FIRST WITNESS STATEMENT OF SIMON KNAPP

I, **NHH KNAPP, CVO. BSc. BVetMed. MRCVS**, of Berkshire Equine Ltd, Headley Stud, Headley, RG19 8LB, **WILL SAY** as follows:

1. I am the Senior Veterinary Surgeon for London Region Races, at Jockey Club Racecourses Limited (the "**Jockey Club**") and Clinical Director of Berkshire Veterinary Surgeons. I have worked for the Jockey Club for approximately 36 years and have been in my current role for approximately 33 years. I am also Senior Racecourse Veterinary Surgeon at Ascot Racecourse.
2. In my current role, I am directly responsible for the overall welfare and the veterinary treatment of the racehorses taking part in the London Regional Races. This includes the Epsom Derby, which is due to take place on 3 June 2023, and is widely regarded as the World's most prestigious flat horse race (the "**Derby**"), as well as the races on Oaks Day, the day before the Derby.
3. I have been a qualified veterinarian for over 40 years. I hold the role of veterinary surgeon to The Royal Mews in London and Windsor responsible for care of the horses to the Royal Household. I was co-coordinator of the veterinary team at the London 2012 Olympics. I am a member of the Horse Welfare Board, and the longest serving member of The British Horseracing Authority Veterinary Committee. I am veterinary advisor to the Racecourse Association.
4. I am a founding member of the Association of Racecourse Veterinary Surgeons, which since 1993, has aimed to promote and safeguard the safety and welfare of horses at race meetings and provides a forum for discussion and the exchange of ideas on the management of injury and disease on racecourses.
5. I make this statement specifically in relation to the welfare of the horses and the potential impact a disruption of the kind threatened by Animal Rising could have on the horses and other participants insofar as I can comment, at the Derby.
6. Unless stated otherwise, the facts and matters set out in this witness statement are within my knowledge and are true. Where any facts or matters are not within my own

knowledge, the source of the information is identified, and those facts and matters are true to the best of my knowledge and belief.

Introduction

7. By way of brief background, I am aware that Animal Rising is an animal activist movement based in the United Kingdom. It is my understanding that Animal Rising intends to disrupt the Derby, and that this is the same organisation that was responsible for the disruption/delay caused to the Aintree Grand National on 15 April 2023. I refer to the Witness Statement of Nevin Truesdale for further detail on what is known by the Jockey Club in respect of Animal Rising and their intended disruption to the Epsom Derby, and the Witness Statement of Dickon White in respect of the incident at the Aintree Grand National.

Welfare and Risks

8. The horses that race at the Derby are thoroughbred racehorses. Thoroughbreds as we know them today are an ecological peak of the breed; they have been selectively bred over many centuries, specifically for racing. They have been domesticated over these many centuries and are not wild animals. Those that race in the Derby are 3-year-old colts full of testosterone and I would describe them as akin to hormonal adolescents; they are very excitable. Horses are naturally flight animals; when this is paired with the fact that the horses at the Derby are young, inexperienced colts weighing around 500kg, they can be quite unpredictable and difficult to control. In comparison, the horses that race in the Grand National are usually older gelding or mare horses around 8 or 9 years-old, experienced with the course and the racing environment.
9. The horses racing in the Derby are finely tuned athletes, they are prepared for this one race. Both the horse and the jockey, akin to any human athlete, need to be in the right frame of mind with full concentration; they need to be in the zone. It is the job of the jockey to form a bond with the horse, to get them in the right place mentally and ensure that the horse is concentrating on the task at hand, the race.
10. Any form of delay or disruption will interfere with the horses' mood and concentration. The horses follow a specific routine to assist with keeping them in the zone. There are particular risks if you delay the race once the horses have left their stables, particularly when they are parading in front of the stands, and more so at the start of the race, where they are confined to a relatively small area behind the starting stalls. By then, they are prepared and absolutely focused for the imminent start of the race. If there is any delay or disruption, the horses could become agitated and frustrated, and therefore unpredictable and difficult to control. They could rear up, kick out, or barge through

areas by way of example. There is an increased risk of them causing injury not only to themselves, but to other horses around them as well as the jockeys, handlers, grooms, and any other person present. If the race is delayed or disrupted whilst the horses are in the stalls, then there is an increased risk of injury to the horses as any such disruption or delay could create behavioural challenges in the horses. An injured horse is particularly unpredictable. As I mention previously horses are flight animals; an injured horse's natural instinct is to run, which could cause it to injure itself further or injure other horses and people present.

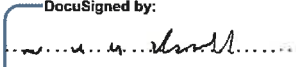
11. If a decision is taken to return the horses to the stables following delay or disruption, they will not walk back quietly, if walk at all, given that at that point they are mentally prepared to race. They again could rear up, kick out, or barge through, causing a potential risk of injury to themselves, other horses, as well as to the jockeys, handlers, grooms, and any other person present.
12. Horses are different from other animals in that they not only sweat to lose heat but sweat from emotional excitement. If they are delayed or disrupted at all, it could lead them to sweat excessively, which is an indication of their excitement, and can predispose them to injury and/or anxiety.
13. The relationship between a horse and jockey is particularly critical; if one loses concentration or focus, because of a distraction or disruption, that could break the bond between them. If the race has started and a disruption occurs, then the jockey only has so much control over the horse at that time. The horse weighs 500kg as opposed to the Jockey's average of 45-58kg; the jockey could attempt to steer the horse but will only be able to do so insofar as the horse will allow. Equally, if the jockey wants to try and stop the horse - at the height of the race they are travelling approximately 43mph. Pulling up would be difficult and would take time and a significant distance to achieve. A horse and jockey may be able to veer out of the way or avoid an obstruction, but only if it has first seen the obstruction and secondly, seen it in good time; even then, it cannot be guaranteed.
14. As I mention previously, as horses are naturally flight animals anything out of the ordinary such as unexpected loud noises, flashes, large banners and smoke devices for example could cause them to become spooked and agitated, which may result in them shying violently and galloping uncontrollably. This carries significant risks in which they would be unpredictable and again could cause injuries to themselves, other horses, and the people around them.

Conclusion

- 15. In my opinion, it is in the best interests of the horses, jockeys, grooms, and all persons present that the Derby go ahead without any disruption and that any risk of disruption should be minimised as much as possible. Any disruption presents significant and serious risks to all involved, particularly the horses health, safety, and wellbeing.

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... 
DocuSigned by:
861F1693E2034A2...

Simon Knapp

Date... 22/052023

Filed on behalf of the Applicant

Witness Statement of Julian Diaz-Rainey

Statement No. 1

Date: 24 May 2023

Exhibits: JDR1

**IN THE HIGH COURT OF JUSTICE
THE BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES
CHANCERY DIVISION
BETWEEN:**

JOCKEY CLUB RACECOURSES LIMITED

Applicant

-and-

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Respondents

WITNESS STATEMENT OF JULIAN DIAZ-RAINEY

I, **JULIAN DIAZ-RAINEY**, of Pinsent Masons LLP, 30 Crown Pl, Earl St, London EC2A 4ES, **WILL SAY** as follows:

1. I am a solicitor of the Senior Court in England and Wales and a Partner (or, more precisely, a Member) in the firm of Pinsent Masons LLP ("**PM**"), solicitors for the Applicant / Claimant.
2. Save where stated to the contrary, the facts and matters contained in this witness statement are within my own knowledge (gained whilst acting as a solicitor for the Applicants) and are true. Where facts and matters are outside my knowledge, the source is stated and I believe those facts to be true.
3. During the course of this statement I will refer to certain documents, copies of which are exhibited in a paginated bundle marked 'JDR1' which accompanies this statement.
4. I make this witness statement in support of the Applicant's application for an interim injunction against the Respondents in the terms of the draft order attached to the application notice.

Service of the claim documents on the First Respondent

5. I enclose at pages 1 - 2 of JDR1 the witness statement of Stephen Williams a process server at Conflicts International Limited. Per that statement, I understand that the Unsealed Application Notice, Sealed Claim Form, Response Pack and witness statements of Nevin Truesdale, Amy Starkey, Simon Knapp and Dickon White (the "**Witness Statements**") were left at the First Respondent's residence at approximately 15:40 on 22 May 2023 after a woman at the address confirmed that the First Respondent lived there.
6. Further, I understand that the Sealed Application Notice was left at the First Respondent's address at approximately 16:29 on 22 May 2023.
7. In addition to the above I enclose at page 3 of JDR1 an email sent to the First Respondent from PM enclosing the Sealed Application Notice, Sealed Claim Form, Response Pack and the Witness Statements at 15:50 on 22 May 2023. Enclosed is

confirmation that the First Respondent downloaded the documents attached to the aforementioned email at 17:24 on 22 May 2023.

8. At approximately 18:30 on 22 May 2023 Animal Rising (“AR”) issued a response to the injunction application on its website¹, which is at page 4 of JDR1. The response is almost entirely one quote attributed to the First Respondent, indicating that he had read the claim documents.
9. I enclose an email from the Applicant to the First Respondent from approximately 18:36 on 22 May 2023 at pages 5 - 6 of JDR1, which amongst other things alerted the First Respondent to the application.
10. At approximately 21:12 on 22 May 2023 Kerri Waters of AR emailed the Applicant to say amongst other things that “*I am also very grateful that you reached out to Dan about the injunction and explained the reasons behind it.*” (page 7 of JDR1).

Service of the claim documents on the Second to Eighth Respondents

11. I enclose at pages 8 - 13 of JDR1 six photographs with details of their metadata taken between 15:48 and 16:04 on 22 May 2023. They show two envelopes containing the Sealed Application Notice, Sealed Claim Form, Response Pack and the Witness Statements at each of the two public entrances to the Epsom Downs Racecourse. This information has been provided to me by Simon Durrant the General Manager of Kempton Park Racecourse.
12. I am instructed that the Sealed Application Notice, Sealed Claim Form, Response Pack and the Witness Statements (save for the exhibit to the witness statement of Nevin Truesdale (Exhibit NT1)) were posted on the websites for Epsom² and the Applicant³ at 16:10 on 22 May 2023. Both of those news articles linked to a page where the claim documents could be downloaded (<https://www.thejockeyclub.co.uk/the-derby-festival-2023/>) (page 18 of JDR1). Exhibit NT1 was added at 17:02 on 22 May 2023.
13. In addition to the above, the Applicant also posted announcements on their social media channels, including twitter⁴ and facebook⁵, at 16:38 on 22 May 2023, with links to a press release (pages 21 - 22 of JDR1).

¹ <https://www.animalrising.org/post/jockey-club-injunction-animal-rising-response> page 4 of JDR1

² <https://www.thejockeyclub.co.uk/epsom/media/news/> pages 14 – 15 JDR1

³ <https://www.thejockeyclub.co.uk/the-racing/racing-news/> pages 16 – 17 of JDR1


⁴ https://twitter.com/TheJockeyClub/status/1660671511781416961?cxt=HHwWqoC9xZ_88YsuAAAA page 19 of JDR1

⁵ https://m.facebook.com/story.php?story_fbid=6533648479999113&id=137224449641580 page 20 of JDR1

14. I also repeat the above in that AR posted on its website a response to the application at approximately 18:30 on 23 May 2023 indicating that persons within AR had seen and considered the claim documents.
15. The Applicant also published a press release (pages 21 - 22 of JDR1), which has resulted in numerous articles regarding the application in the mainstream media. In this way, it took additional steps to bring the fact of the application (if not the claim documents themselves) to the attention of a wide range of stakeholders, including the Second to Eighth Respondents.

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..........

Julian Diaz-Rainey

Date.....24-05-23.....

Filed on behalf of the Claimant
Statement of: S Williams
Statement Number: 1
Exhibits:
Dated:
Filed:

Case No BL-2023-000713

IN THE HIGH COURT OF JUSTICE

BUSINESS AND PROPERTY COURTS

CHANCERY DIVISION

BETWEEN

JOCKEY CLUB RACECOURSES LIMITED

Claimant

and

- (1) DANIEL FRANK PETER KIDBY
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Defendants

STATEMENT OF PROCESS SERVER

I, Stephen Williams of Conflict International Limited 180 Piccadilly, London, W1J 9HF, process server, acting in the employ of Pinsent Masons LLP of 30 Crown Place, Earl Street, London, EC2A 4ES, Solicitors for the Claimant in this matter, **State as follows:-**

1. THAT I did on Monday 22/05/2023 at 15:25 hours, attend in the vicinity of [REDACTED] in order to personally serve upon Daniel Frank Peter Kidby, the First Defendant, the Claim Form issued on 22/05/2023, the Application Notice, the Notes for Defendant, the Acknowledgement of Service, the Witness Statement of Amy Starkey with Exhibit, the Witness Statement of Dickon White with Exhibit, the Witness Statement of Simon Knapp and the Witness

1

Statement of Nevin Truesdale with Exhibit. I was able to confirm with neighbours the continued residency of the First Defendant at the aforementioned address.

2. THAT upon attendance at [REDACTED] I met with an adult female who confirmed that Daniel Frank Peter Kidby, the First Defendant, resides at the property, but was not at home at the time. She confirmed that Mr Kidby was not due to return home until the evening of Tuesday 23/05/2023. I explained the purpose of my attendance and that I had important legal paperwork to deliver to Mr Kidby. I informed her that I would withdraw and get permission to post the documents through the letterbox.
3. THAT on Monday 22/05/2023 at 15:40 hours I posted the aforementioned documents through the letterbox at [REDACTED] in a series of envelopes addressed to Daniel Frank Peter Kidby, the First Defendant. Prior to service I had marked on an envelope the details of the Hearing date and time.
4. THAT on Monday 22/05/2023 I returned to the aforementioned address at 16:29 hours and posted a further copy of the Application Notice which had been issued in the High Court of Justice and endorsed with the Hearing date and time.
5. 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  Dated..... 24/5/23

Iona Wilson

From: Iona Wilson
Sent: 22 May 2023 15:50
To: d.f.p.kidby@outlook.com
Cc: Julian Diaz-Rainey; Trevor Watkins; Alexander Richardson (Litigation, Regulatory & Tax)
Subject: JCR v (1) Daniel Kidby; and (2)-(8) Persons Unknown

Large File Send Sent Files

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You shared files with d.f.p.kidby@outlook.com Julian.Diaz-Rainey@pinsentmasons.com Trevor.Watkins@pinsentmasons.com Alexander.Richardson@pinsentmasons.com.

File(s):

Witness Statement of Amy Starkey and Exhibit - 22 May 2023 (Final) (Signed).pdf
Witness Statement of Dickon White and Exhibit 22 May 2023 (Final) (Signed).pdf
Witness Statement of Nevin Truesdale and Exhibit 22 May 2023 (Final) (Signed).pdf
Endorsed Application Notice N244 21052023(140249495(140259774.1)).pdf
Sealed Claim Form and additional sheet 22 May 2023(140252735.1).pdf
Witness Statement of Simon Knapp - 22 May 2023 (Final) (Signed).pdf
n208c-eng Notes for Defendant Part 8 claim.pdf
N210_1122_save AoS.pdf

Dear Mr Kidby

Please find enclosed for your urgent attention:

- i. Sealed Claim Form dated 22 May 2023;
- ii. Sealed Application Notice dated 22 May 2023;
- iii. Witness Statement and Exhibit of Nevin Truesdale dated 22 May 2023;
- iv. Witness Statement and Exhibit of Amy Starkey dated 22 May 2023;
- v. Witness Statement and Exhibit of Dickon White dated 22 May 2023;
- vi. Witness Statement of Simon Knapp dated 22 May 2023; and
- vii. Acknowledgement of Service Documents (Forms N208 and N210).

Please acknowledge receipt of this email.

Yours faithfully,

Pinsent Masons LLP

Jockey Club Injunction: Animal Rising Response



- This afternoon Animal Rising was informed by The Jockey Club that they have applied for an injunction against the group ahead of The Epsom Derby Festival on 3-4 June. The case will be heard this Friday 26/5/23 [1].
- This comes after Animal Rising made several public statements earlier this month regarding the event [2].

Dan Kidby, co-founder of Animal Rising said:

"Injunctions are a little-known, but often-used, way of bypassing democracy and allowing private companies to essentially buy their own laws. They've been used against local groups that challenged HS2, traveller communities in Wolverhampton, and now against animal lovers attempting to stop harm from coming to racehorses.

Animal Rising is committed to nonviolent action to create a national conversation about our shattered connection to other animals and nature - doing so is the first step towards a kinder and better world for all life.

I've been having consistent, productive communication with the Jockey Club over the last month, and I don't see this being the end of that. It's clear that we all love the horses that are set to run at Epsom next month - we just disagree on how to show that love. We can only mend our broken relationship with other animals and nature when we come together, and that is what Animal Rising will keep working towards."

The Injunction documents reveal that the Jockey Club spent in excess of £70,000 on security at The Grand National, and expects the Epsom Derby Festival costs to more than double that at £150,000.

Word Count: 262

High-Quality Pictures and Videos: <https://show.pics.to/animal-rebellion-breaking-news>

All images and videos in this file, on our social media, and website can be used with credit to Animal Rising under 'fair use' for the purposes of reporting.

For more information or further comments, please contact:

Nathan (Press Back Office) 07466114387

press@animalarising.org

Notes To The Editor:

[1] <https://www.thejockeyclub.co.uk/about-us/media-centre/press-releases/2023/05/the-jockey-club-applies-for-injunction-in-an-effort-to-prevent-illegal-and-reckless-disruption-of-the-derby-festival-at-epsom-stewarts>

[2] <https://www.animalarising.org/post/epsom-is-next-animal-rising-declares-intention-to-disrupt-the-derby-festival>

Iona Wilson

From: Iona Wilson
Sent: 24 May 2023 11:30
To: Iona Wilson
Subject: FW: Application for an injunction

From: "Starkey, Amy" <Amy.Starkey@thejockeyclub.co.uk>
Date: May 22, 2023 at 18:36:00 GMT+2
To: Daniel Kidby <d.f.p.kidby@outlook.com>
Cc: Kerri Waters <kerri_waters@hotmail.com>, "Williamson, Stuart" <Stuart.Williamson@thejockeyclub.co.uk>, "Truesdale, Nevin" <Nevin.Truesdale@thejockeyclub.co.uk>, "Durrant, Simon" <Simon.Durrant@thejockeyclub.co.uk>
Subject: Application for an injunction

Dear Dan,

By now, you will be aware of our decision to apply for an injunction to prevent trespass at Epsom Downs during the Derby Festival with the intention of protecting the race goers, horses, jockeys and also protestors attending the event. Given our open communication throughout, it is important to me to ensure we carry on communicating in that spirit.

I wanted to explain how we arrived at the conclusion that seeking an injunction is a necessary step for The Jockey Club to take.

As we have stated both in person and in all our communications with you, our number one priority will always be to ensure that the safety of all our equine and human participants and the thousands of racegoers who join us at Epsom Downs is not compromised.

You have always been entirely transparent when highlighting Animal Rising's determination to disrupt The Derby by breaching security and gaining access to the racetrack. As you know, this course of action threatens the safety of everyone at the event. As such, we feel obliged to explore every option available to us to deter those who might be considering acting in this way, and to respond decisively if the intended actions go ahead.

The decision to apply for an injunction is not something we have taken lightly. It was arrived at after significant consideration, together with Surrey Police and other stakeholders. Ultimately, we felt we had no option in light of your commitment to disrupting the races. The injunction sought would be an important and necessary addition to the many other robust security measures we are implementing to ensure the event can go ahead safely.

Please be reassured that our application has no bearing whatsoever on our offer of a space outside the racecourse for Animal Rising to protest peacefully, which we very much hope you will continue to accept. That space is clearly identifiable and we welcome you to use it for peaceful protest. We make no apology for doing all we can to protect the safety and enjoyment of those who attend Epsom Downs in their thousands, and the experience of millions more at home and around the world who enjoy a race which has taken place since 1780.

As we have repeated in all our communications with you, we urge Animal Rising to abandon your plans to disrupt the Derby Festival.

We reiterate a respect for your views, and hope that we may maintain a dialogue in the build-up to The Derby Festival. If there is any further information you wish to share with us relating to your plans, please do not hesitate to contact me.

Many thanks and best wishes,
Amy

AMY STARKEY | MANAGING DIRECTOR, JOCKEY CLUB RACECOURSES

+44 (0) 7901 716233
thejockeyclub.co.uk



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Iona Wilson

From: Iona Wilson
Sent: 24 May 2023 11:33
To: Iona Wilson
Subject: Meeting follow-up [PM-AC.FID5703712]

From: Kerri Waters <kerri_waters@hotmail.com>
Date: May 22, 2023 at 21:12:17 GMT+2
To: "Starkey, Amy" <Amy.Starkey@thejockeyclub.co.uk>
Cc: Daniel Kidby <d.f.p.kidby@outlook.com>, "Truesdale, Nevin" <Nevin.Truesdale@thejockeyclub.co.uk>, "Williamson, Stuart" <Stuart.Williamson@thejockeyclub.co.uk>, "Durrant, Simon" <Simon.Durrant@thejockeyclub.co.uk>
Subject: Re: Meeting follow-up

Dear Amy,

Just a quick thanks for putting us in touch with Simon and I'll help liaise between our team organising the event outside and your Operations Team.

I am also very grateful that you reached out to Dan about the injunction and explained the reasons behind it. No doubt, you didn't take the decision lightly.

As always, I will continue to update you with our plans and am happy to answer your questions or requests.

Best wishes,

Kerri



Add a Caption

Monday • 22 May 2023 • 16:01

[Adjust](#)

 IMG_0483

Apple iPhone 14 Pro

JPEG

Main Camera — 24 mm *f*1.78

12 MP • 4032 × 3024 • 4.7 MB

ISO80

24mm

0ev

*f*1.78

1/9709s





Add a Caption

 Look Up – **Landmark** >

Monday • 22 May 2023 • 16:02

[Adjust](#)

 IMG_0484

Apple iPhone 14 Pro

JPEG

Main Camera — 24 mm $f1.78$

12 MP • 4032 × 3024 • 4.9 MB

ISO80

24mm

0ev

$f1.78$

1/8197s





Add a Caption

Monday • 22 May 2023 • 15:50

[Adjust](#)

 IMG_0481

Apple iPhone 14 Pro

JPEG

Main Camera — 24 mm $f1.78$

12 MP • 3024 × 4032 • 4.7 MB

ISO80

24mm

0ev

$f1.78$

1/4545s





Add a Caption

Monday • 22 May 2023 • 15:50

[Adjust](#)

 IMG_0482

Apple iPhone 14 Pro

JPEG

Main Camera — 24 mm $f1.78$

12 MP • 4032 × 3024 • 5.5 MB

ISO80

24mm

0ev

$f1.78$

1/7576s





Add a Caption

Monday • 22 May 2023 • 16:04

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 IMG_0485

Apple iPhone 14 Pro

JPEG

Main Camera — 24 mm *f*1.78

12 MP • 4032 × 3024 • 4.1 MB

ISO80 | 24mm | 0ev | *f*1.78 | 1/13699s





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Monday • 22 May 2023 • 15:48

[Adjust](#)

 IMG_0480

Apple iPhone 14 Pro

JPEG

Main Camera — 24 mm f1.78

12 MP • 3024 x 4032 • 3.9 MB

ISO80

24mm

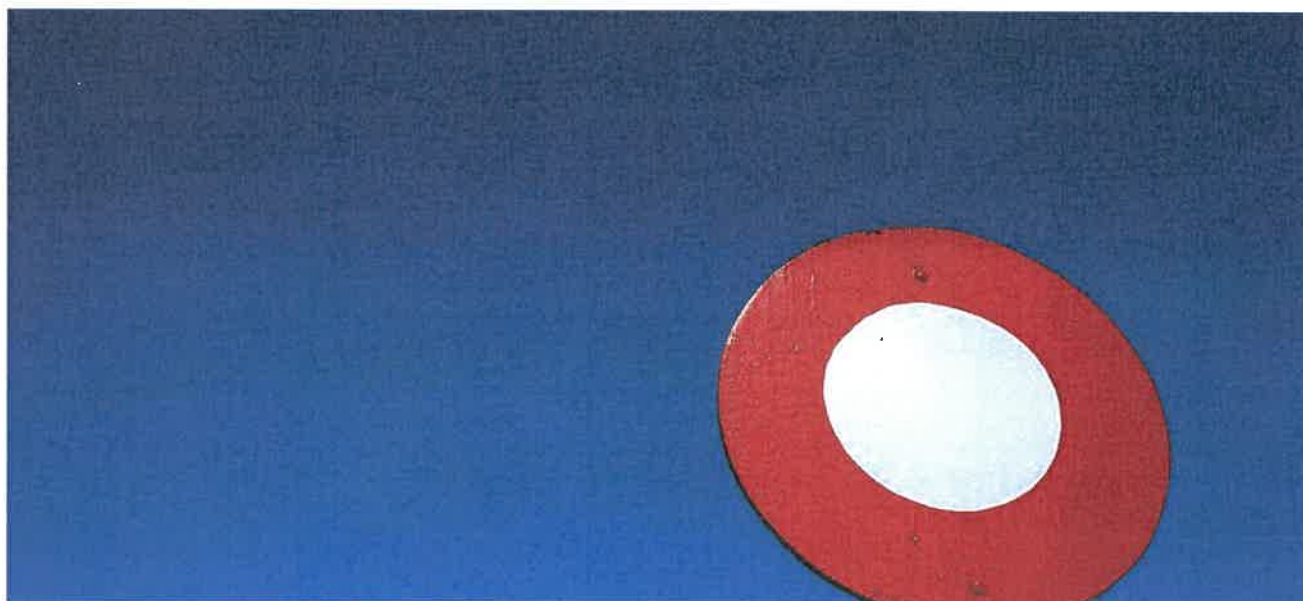
0ev

f1.78

1/3717s



EPSOM DOWNS NEWS



The Derby Festival 2023

The Jockey Club made the following application on Monday 22nd May 2023.

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Article ✓

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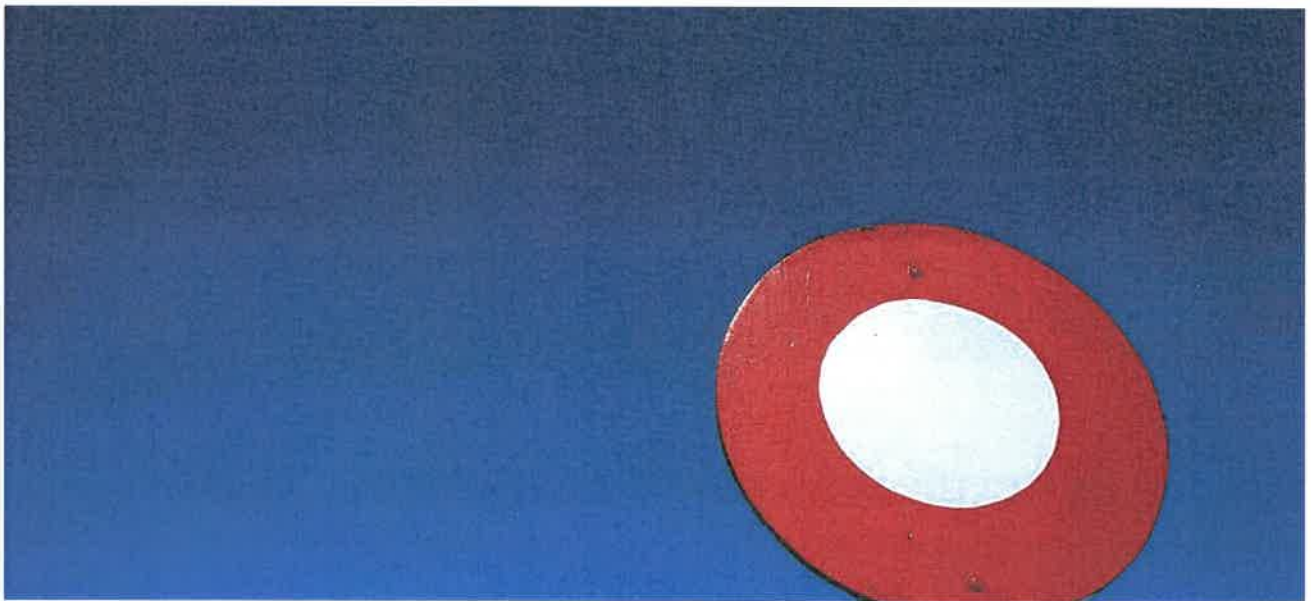
22 MAY 2023

THE JOCKEY CLUB APPLIES FOR INJUNCTION IN AN EFFORT TO PREVENT “ILLEGAL AND RECKLESS” DISRUPTION OF





NEWS DESK



The Derby Festival 2023

The Jockey Club made the following application on Monday 22nd May 2023.

[VIEW APPLICATION](#)



RACECOURSES

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Select Month



Select Year



22 MAY 2023

THE JOCKEY CLUB APPLIES FOR INJUNCTION IN AN EFFORT TO PREVENT “ILLEGAL AND RECKLESS” DISRUPTION OF





The Derby Festival 2023

The Jockey Club made the following application on Monday 22nd May 2023:

[View Application Notice](#)

[View Notes for Defendant](#)

[View Acknowledgment of Service](#)

[View Claim Form](#)

[View Witness Statement Nevin Truesdale](#)

[Exhibit to Witness Statement of Nevin Truesdale Part One](#)

[Exhibit to Witness Statement of Nevin Truesdale Part Two](#)

[View Witness Statement Amy Starkey](#)

[View Witness Statement Dickon White](#)

[View Witness Statement Simon Knapp](#)



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0:13 / 0:44 7,990

The Jockey Club @TheJockeyClub · 22 May

The Jockey Club has today lodged an application to the High Court seeking an injunction to prohibit acts intended to disrupt The Derby Festival @EpsomRacecourse.

Find out more: bit.ly/DerbyPressRelease

23 69 245 171.4K

The Jockey Club Retweeted

Racing Welfare @Racingwelfare · 15 May

Today is the start of #MentalHealthAwarenessWeek and this year the theme is ANXIETY.

Our aim is to normalise conversations about mental health & encourage people in racing to take action for their mental health.

Watch our new film produced by @EquineP



youtube.com

Racing Welfare #MentalHealthAwarenessWeek2...
#MentalHealthAwarenessWeek (Monday 15th - Sunday 21st May 2023) is a national campaign ru...

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@TheJockeyClub1750
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The largest commercial group in British horseracing, every penny The Jockey Club makes is reinvested...

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The Jockey Club
23h

The Jockey Club has today lodged an application to the High Court seeking an injunction to prohibit acts intended to disrupt The Derby Festival at Epsom Downs Racecourse.

Find out more: <https://bit.ly/DerbyPressRelease>

413

42 comments 41 shares

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Sharon Hill

This doesn't stop the protesters going but it will give them the powers to get them off site and prosecute. That's how I read it anyway.

21h

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The Jockey Club

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The Art School Restaurant
Liverpool

29 December 2022 at 10:14
What a year it's been, indeed! From our first year at Aintree Rac... See more

65

16 comments 14 shares



Sally Hambleton Knight
4 March 2014 at 10:47

pancake ridden by Brendan Powell

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THE JOCKEY CLUB APPLIES FOR INJUNCTION IN AN EFFORT TO PREVENT “ILLEGAL AND RECKLESS” DISRUPTION OF THE DERBY FESTIVAL AT EPSOM DOWNS

Press Release 22nd May 2025

The Jockey Club, which runs Epsom Downs Racecourse, has today lodged an application to the High Court seeking an injunction to prohibit acts intended to disrupt The Derby Festival.

British racing’s largest commercial operator and employer said it had been forced to take the decision because protesters from Animal Rising continue to make it “explicitly clear” that they intend to breach security at the Surrey racecourse to stage a disruptive protest, which may compromise the safety of equine and human participants and all racegoers.

An injunction would in no way threaten the right of anyone to protest in a peaceful and law-abiding way and The Jockey Club has already offered Animal Rising an area **251**



Details of The Jockey Club's application for an injunction can be found on its website [HERE](#). The injunction sought would prohibit individuals from entering onto the racetrack and carrying out other acts with the intention and/or effect of disrupting the races. Such acts include intentionally causing objects to enter the racetrack, entering the parade ring, entering and/or remaining on the horses' route to the parade ring and to the racetrack without authorisation, and intentionally endangering any person at Epsom Downs Racecourse during the two-day Derby Festival.

If the injunction is granted, individuals acting in breach of the court order could be subject to proceedings for contempt of court, which may lead to a fine and/or imprisonment.

A High Court hearing, which will rule on whether to grant the injunction, has been scheduled to take place on Friday 26th May.

Nevin Truesdale, Chief Executive of The Jockey Club, said: "In planning for The Derby Festival our number one priority will always be to ensure that the safety of all our equine and human participants and the thousands of racegoers who join us at Epsom Downs is not compromised.

"We respect everyone's right to peaceful and lawful protest and with that in mind have offered Animal Rising a space for this purpose directly outside the racecourse during The Derby Festival.

"However, Animal Rising have made it explicitly clear that they intend to breach security and access the track itself in an attempt to stop racing taking place and it is our duty and obligation to do everything we can to protect everyone's safety and prevent a repeat of the illegal and reckless protests we saw at Aintree in April.

"As such the decision to apply for an injunction is a course of action we have been forced to take and is the result of careful consideration following consultation with Surrey Police and a number of stakeholders. If successful, this would be just one of a range of robust security measures we are implementing to ensure the event can go ahead safely.

"We are proud to stage The Derby Festival and hope that the thousands of people who look forward to attending over the two days and the millions more watching at home and around the world are able to enjoy what is not only an important event for the sport but an iconic moment in the British summer and a celebration of the Thoroughbred."

Certificate of service

Name of court High Court of Justice The Business & Property Courts	ClaimNo BL-2023-000713
Name of Claimant Jockey Club Racecourses Limited	
Name of Defendant (1) Daniel Frank Peter Kidby (2) - (8) Persons Unknown	

On what day did you serve? / /

The date of service is / /

What documents did you serve?
Please attach copies of the documents you have not already filed with the court.

(1) Sealed Claim Form (2) Application Notice (3) Sealed Application Notice (4) Witness Statements of Nevin Truesdale, Dickon White, Amy Starkey, Simon Knapp (5) Response Pack

On whom did you serve?
(If appropriate include their position e.g. partner, director).

The First Defendant

How did you serve the documents?
(please tick the appropriate box)

- by first class post or other service which provides for delivery on the next business day
- by delivering to or leaving at a permitted place
by personally handing it to or leaving it with
 (.....time left, where document is other than a claim form) (please specify)
- by other means permitted by the court (please specify)
- by Document Exchange
- by fax machine (.....time sent, where document is other than a claim form) (you may want to endorse a copy of the transmission sheet)
- by other electronic means (.15:50.....time sent, where document is other than a claim form) (please specify)

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

Being the claimant's defendant's
 solicitor's litigation friend

- usual residence
- last known residence
- place of business
- principal place of business
- last known place of business
- last known principal place of business
- principal office of the partnership
- principal office of the corporation
- principal office of the company
- place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim
- other (please specify)

D1's residence at address confirmed by person (who was at the address)

I believe that the facts stated in this certificate are true.

Full name

Signed
(Claimant) (Defendant) (solicitor) (litigation friend)

Position or office held
(If signing on behalf of firm or company)

Date / /

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules (www.justice.gov.uk) and you should refer to the rules for information.

Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	Deemed day of service
First class post or other service which provides for delivery on the next business day	The second day after it was posted, left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Document exchange	The second day after it was left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Delivering the document to or leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day before 4.30pm, on that day; or in any other case, on the next business day after that day
Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted
Other electronic method	If the email or other electronic transmission is sent on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was sent
Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

Certificate of service

Name of court High Court of Justice The Business & Property Courts	ClaimNo BL-2023-000713
Name of Claimant Jockey Club Racecourses Limited	
Name of Defendant (1) Daniel Frank Peter Kidby (2) - (8) Persons Unknown	

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On whom did you serve?
(If appropriate include their position e.g. partner, director).

(2) - (8) Persons Unknown

How did you serve the documents?
(please tick the appropriate box)

by first class post or other service which provides for delivery on the next business day

by delivering to or leaving at a permitted place

by personally handing it to or leaving it with
(.....time left, where document is other than a claim form) *(please specify)*

by other means permitted by the court
(please specify)

2 copies at each public entrance to the Epsom Downs Racecourse, per C's application for alternative service

by Document Exchange

by fax machine (.....time sent, where document is other than a claim form) *(you may want to enclose a copy of the transmission sheet)*

by other electronic means (.....time sent, where document is other than a claim form) *(please specify)*

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

Each public entrance to the Epsom Downs Racecourse, Tattenham Corner Rd, Epsom KT18 5LQ

Being the claimant's defendant's
 solicitor's litigation friend

usual residence

last known residence

place of business

principal place of business

last known place of business

last known principal place of business

principal office of the partnership

principal office of the corporation

principal office of the company

place of business of the partnership/company/
corporation within the jurisdiction with a connection to claim

other *(please specify)*

2 copies at each publicentrance to Epsom Racecourse; email to AR; website uploaded; press release

I believe that the facts stated in this certificate are true.

Full name

Signed



Position or office held

(Claimant) (Defendant) ('s solicitor) (litigation friend)

(If signing on behalf of firm or company)

Date / /

255

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules (www.justice.gov.uk) and you should refer to the rules for information.

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Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

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Archived: 24 May 2023 15:47:16

From: [Daniel Kidby](#)

Sent: Wed, 24 May 2023 04:27:14

To: [Iona Wilson](#)

Cc: [Julian Diaz-Rainey](#) [Trevor Watkins](#) [Alexander Richardson \(Litigation, Regulatory & Tax\)](#) [Starkey, Amy](#) [Kerri Waters](#)

Subject: [EXTERNAL] Re: JCR v (1) Daniel Kidby; and (2)-(8) Persons Unknown

Importance: Normal

Sensitivity: None

Hi there,

Thank you very much for your professional correspondence. I apologise for my delayed response as I've been travelling the last couple of days.

I can confirm that I have received this paperwork and that I do intend to appear in court on Friday 26th May to contest this claim. The primary argument I will make will focus on the appropriateness of using civil law instruments like injunctions when there are ample criminal laws covering our actions, and that the (mis)use of an injunction effectively denies participants their democratic rights to a trial by jury. As legal professionals from a highly regarded firm as Pinsent Masons, I hope you can see how the increased use of such instruments to repress nonviolent protest, of which this is just one example, represents an erosion of the rule of law. I will be filing my papers and contacting the court this afternoon to make arrangements to be there. I look forward to a respectful exchange.

There is one amendment I'd like to request from Amy Starkey's witness statement in advance of the hearing. I have also cc'd Amy in this email so she can see my request too.

In paragraph 12 it was reported that we communicated that Kerri Waters will be leading the peaceful protest and I (Dan Kidby) would be leading the disruption. However, this was not communicated by us. The only thing we said was that Kerri was going to attend (not lead) the peaceful protest. We did not state what I would be doing on the day and did not say I would be leading the disruption. I accept this was simply a misunderstanding and don't suggest in anyway this was an intentional misrepresentation of the minutes, but I would appreciate it if this amendment could be made. Kerri (cc'd) can verify this is what was communicated.

As we have demonstrated by publicising our plans, having a very open meeting with The Jockey Club and BHA, and me being transparent in my co-founder role, we practice openness and honesty within Animal Rising. That being the case, if I was leading this demonstration, I would gladly say so. But unfortunately, my role in AR tends to be far less exciting than leading and planning actions. I focus on fundraising, dialogue (such as what we have with the jockey club), strategy, embedding nonviolence, and other small bits and bobs. I do also participate in some of our actions, such as the Grand National. My honest position is that I haven't yet decided whether or not I'm participating in the action at Epsom yet. I don't participate in every single action we do as we do too many.

The reason why Kerri and I were the ones to meet with Amy and her colleagues is because we are in the dialogue team and believed it was the right thing to approach you considering the levels of disruption Animal Rising are causing, not because we take a leading role in the demonstrations. I apologise for not making that clear before and causing confusion. I fully understand how, by virtue of the fact that we were at the meeting, and because Amy is naturally unfamiliar with our organising structure, she would have perceived us as the leaders of demonstrations.

Please let me know if you are willing to make this amendment. I am otherwise happy that the minutes are an accurate reflection of

the conversation, and I thank Amy for recording them. Though I do note that as a summary some parts/details of the conversation have been omitted, and some parts of the reported minutes are more interpretation than plain reporting "we were able to robustly push back on all points". *If* we have time before Friday we may provide an alternative set of minutes which can act as a supplement to these.

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With care,

Dan

Dan Kidby
Co-Founder Animal Rising (formerly Animal Rebellion)

"The times are urgent, let us slow down" ~ Bayo Akomolafe

"These cows seem as rebellious to their owners as the people are to their kings" ~ Fynes Moryson

From: Iona Wilson <Iona.Wilson@pinsentmasons.com>
Sent: Tuesday, 23 May 2023, 20:47
To: d.f.p.kidby@outlook.com <d.f.p.kidby@outlook.com>
Cc: Julian Diaz-Rainey <Julian.Diaz-Rainey@pinsentmasons.com>; Trevor Watkins <Trevor.Watkins@pinsentmasons.com>; Alexander Richardson (Litigation, Regulatory & Tax) <Alexander.Richardson@pinsentmasons.com>
Subject: RE: JCR v (1) Daniel Kidby; and (2)-(8) Persons Unknown

Dear Mr Kidby,

Further to the below, please find attached a draft copy of the bundle index we intend to file with the Court for the hearing on Friday 26 May 2023. Please let us know if you have any comments by noon tomorrow, 24 May 2023.

Yours sincerely,

Pinsent Masons LLP

From: Iona Wilson
Sent: Monday, May 22, 2023 3:50 PM
To: d.f.p.kidby@outlook.com
Cc: Julian Diaz-Rainey <Julian.Diaz-Rainey@pinsentmasons.com>; Trevor Watkins <Trevor.Watkins@pinsentmasons.com>; Alexander Richardson (Litigation, Regulatory & Tax) <Alexander.Richardson@pinsentmasons.com>
Subject: JCR v (1) Daniel Kidby; and (2)-(8) Persons Unknown

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File(s):

Witness Statement of Amy Starkey and Exhibit - 22 May 2023 (Final) (Signed).pdf
Witness Statement of Dickon White and Exhibit 22 May 2023 (Final) (Signed).pdf
Witness Statement of Nevin Truesdale and Exhibit 22 May 2023 (Final) (Signed).pdf
Endorsed Application Notice N244 21052023(140249495(140259774.1).pdf
Sealed Claim Form and additional sheet 22 May 2023(140252735.1).pdf
Witness Statement of Simon Knapp - 22 May 2023 (Final) (Signed).pdf
n208c-eng Notes for Defendant Part 8 claim.pdf
N210_1122_save AoS.pdf

Dear Mr Kidby

Please find enclosed for your urgent attention:

- i. Sealed Claim Form dated 22 May 2023;
- ii. Sealed Application Notice dated 22 May 2023;
- iii. Witness Statement and Exhibit of Nevin Truesdale dated 22 May 2023;
- iv. Witness Statement and Exhibit of Amy Starkey dated 22 May 2023;
- v. Witness Statement and Exhibit of Dickon White dated 22 May 2023;
- vi. Witness Statement of Simon Knapp dated 22 May 2023; and
- vii. Acknowledgement of Service Documents (Forms N208 and N210).

Please acknowledge receipt of this email.

Yours faithfully,

Pinsent Masons LLP

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Archived: 24 May 2023 15:47:45

From: [Daniel Kidby](#)

Sent: Wed, 24 May 2023 10:44:19

To: [Iona Wilson](#)

Cc: [Julian Diaz-Rainey](#) [Trevor Watkins](#) [Alexander Richardson \(Litigation, Regulatory & Tax\)](#) [Starkey, Amy](#) [Kerri Waters](#)

Subject: [EXTERNAL] Re: JCR v (1) Daniel Kidby; and (2)-(8) Persons Unknown

Importance: Normal

Sensitivity: None

Hi everyone,

Apologies but I made a slight error in my previous email. I will restate one point so it is clear.

In the meeting Kerri did not say she was "leading" the protest outside the gates, she actually said she was "helping to organise" the protest outside. She didn't say she was "attending" it, that was my mistake writing an email at 4am.

Otherwise, everything else in my previous email was accurate. Sorry for the confusion. And thanks for amending this for accuracy.

Kerri will write to confirm these things very shortly.

Best,

Dan

Dan Kidby
Co-Founder Animal Rising (formerly Animal Rebellion)

"The times are urgent, let us slow down" ~ Bayo Akomolafe

"These cows seem as rebellious to their owners as the people are to their kings" ~ Fynes Moryson

From: Daniel Kidby <d.f.p.kidby@outlook.com>

Sent: 24 May 2023 05:27

To: [Iona Wilson](#) <Iona.Wilson@pinsentmasons.com>

Cc: [Julian Diaz-Rainey](#) <Julian.Diaz-Rainey@pinsentmasons.com>; [Trevor Watkins](#) <Trevor.Watkins@pinsentmasons.com>;

[Alexander Richardson \(Litigation, Regulatory & Tax\)](#) <Alexander.Richardson@pinsentmasons.com>; [Starkey, Amy](#)

<Amy.Starkey@thejockeyclub.co.uk>; [Kerri Waters](#) <kerri_waters@hotmail.com>

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Sent: Tuesday, 23 May 2023, 20:47
To: d.f.p.kidby@outlook.com <d.f.p.kidby@outlook.com>
Cc: Julian Diaz-Rainey <Julian.Diaz-Rainey@pinsentmasons.com>; Trevor Watkins <Trevor.Watkins@pinsentmasons.com>; Alexander Richardson (Litigation, Regulatory & Tax) <Alexander.Richardson@pinsentmasons.com>
Subject: RE: JCR v (1) Daniel Kidby; and (2)-(8) Persons Unknown

Dear Mr Kidby,

Further to the below, please find attached a draft copy of the bundle index we intend to file with the Court for the hearing on Friday 26 May 2023. Please let us know if you have any comments by noon tomorrow, 24 May 2023.

Yours sincerely,

Pinsent Masons LLP

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- vi. Witness Statement of Simon Knapp dated 22 May 2023; and
- vii. Acknowledgement of Service Documents (Forms N208 and N210).

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Archived: 24 May 2023 15:48:14

From: [Kerri Waters](#)

Sent: 24 May 2023 11:52:53

To: [Daniel Kidby](#)

Cc: [Iona Wilson](#) [Julian Diaz-Rainey](#) [Trevor Watkins](#) [Alexander Richardson \(Litigation, Regulatory & Tax\)](#) [Starkey, Amy](#)

Subject: [EXTERNAL] Re: JCR v (1) Daniel Kidby; and (2)-(8) Persons Unknown

Importance: Normal

Sensitivity: None

Hello,

Following Dan's email below, I can verify that we did not state what role, if any, Dan would be playing at the Epsom Derby. Additionally, I did not say I would be definitely be attending the peaceful protest outside, merely that I was a number of people helping to facilitate its organisation. I have stated I would passing on information to a team organising the demo throughout my correspondence with the Jockey Club.

It is important to note that Animal Rising shares power and responsibilities with all volunteers, and as such, it is impossible to name one person as in charge. I have also not confirmed what I will be doing on the day of the protest.

Best wishes,

Kerri Waters

On 24 May 2023, at 12:44, Daniel Kidby <d.f.p.kidby@outlook.com> wrote:

Hi everyone,

Apologies but I made a slight error in my previous email. I will restate one point so it is clear.

In the meeting Kerri did not say she was "leading" the protest outside the gates, she actually said she was "helping to organise" the protest outside. She didn't say she was "attending" it, that was my mistake writing an email at 4am.

Otherwise, everything else in my previous email was accurate. Sorry for the confusion. And thanks for amending this for accuracy.

Kerri will write to confirm these things very shortly.

Best,

Dan

Dan Kidby
Co-Founder Animal Rising (formerly Animal Rebellion)

"The times are urgent, let us slow down" ~ Bayo Akomolafe

"These cows seem as rebellious to their owners as the people are to their kings" ~ Fynes Moryson

From: Daniel Kidby <d.f.p.kidby@outlook.com>

Sent: 24 May 2023 05:27

To: Iona Wilson <Iona.Wilson@pinsentmasons.com>

Cc: Julian Diaz-Rainey <Julian.Diaz-Rainey@pinsentmasons.com>; Trevor Watkins <Trevor.Watkins@pinsentmasons.com>; **264**

Alexander Richardson (Litigation, Regulatory & Tax) <Alexander.Richardson@pinsentmasons.com>; Starkey, Amy <Amy.Starkey@thejockeyclub.co.uk>; Kerri Waters <kerri_waters@hotmail.com>

Subject: Re: JCR v (1) Daniel Kidby; and (2)-(8) Persons Unknown

Hi there,

Thank you very much for your professional correspondence. I apologise for my delayed response as I've been travelling the last couple of days.

I can confirm that I have received this paperwork and that I do intend to appear in court on Friday 26th May to contest this claim. The primary argument I will make will focus on the appropriateness of using civil law instruments like injunctions when there are ample criminal laws covering our actions, and that the (mis)use of an injunction effectively denies participants their democratic rights to a trial by jury. As legal professionals from a highly regarded firm as Pinsent Masons, I hope you can see how the increased use of such instruments to repress nonviolent protest, of which this is just one example, represents an erosion of the rule of law. I will be filling my papers and contacting the court this afternoon to make arrangements to be there. I look forward to a respectful exchange.

There is one amendment I'd like to request from Amy Starkey's witness statement in advance of the hearing. I have also cc'd Amy in this email so she can see my request too.

In paragraph 12 it was reported that we communicated that Kerri Waters will be leading the peaceful protest and I (Dan Kidby) would be leading the disruption. However, this was not communicated by us. The only thing we said was that Kerri was going to attend (not lead) the peaceful protest. We did not state what I would be doing on the day and did not say I would be leading the disruption. I accept this was simply a misunderstanding and don't suggest in anyway this was an intentional misrepresentation of the minutes, but I would appreciate it if this amendment could be made. Kerri (cc'd) can verify this is what was communicated.

As we have demonstrated by publicising our plans, having a very open meeting with The Jockey Club and BHA, and me being transparent in my co-founder role, we practice openness and honesty within Animal Rising. That being the case, if I was leading this demonstration, I would gladly say so. But unfortunately, my role in AR tends to be far less exciting than leading and planning actions. I focus on fundraising, dialogue (such as what we have with the jockey club), strategy, embedding nonviolence, and other small bits and bobs. I do also participate in some of our actions, such as the Grand National. My honest position is that I haven't yet decided whether or not I'm participating in the action at Epsom yet. I don't participate in every single action we do as we do too many.

The reason why Kerri and I were the ones to meet with Amy and her colleagues is because we are in the dialogue team and believed it was the right thing to approach you considering the levels of disruption Animal Rising are causing, not because we take a leading role in the demonstrations. I apologise for not making that clear before and causing confusion. I fully understand how, by virtue of the fact that we were at the meeting, and because Amy is naturally unfamiliar with our organising structure, she would have perceived us as the leaders of demonstrations.

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With care,

Dan

Dan Kidby
Co-Founder Animal Rising (formerly Animal Rebellion)

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Iona Wilson

From: Alexander Richardson (Litigation, Regulatory & Tax)
Sent: 24 May 2023 16:17
To: Daniel Kidby; Iona Wilson
Cc: Julian Diaz-Rainey; Trevor Watkins
Subject: RE: JCR v (1) Daniel Kidby; and (2)-(8) Persons Unknown

Dear Mr. Kidby,

Thank you for your email, and for the professional and courteous tone in which it was sent. Thank you also for confirming that you have received the claim documents.

As you might expect, we do not agree with your points on the rule of law. As to the minutes from the meeting, from our client's perspective, they correctly record what was stated from their recollection. If this does not accord with your memory of the meeting, you are of course entitled to make points in this respect in your submissions to the Court.

In this regard:

1. we have been asked to file the Hearing Bundle with the Court this afternoon. We will include your email in the Bundle so the Court has sight of it. We will provide you with a copy of the finalised Bundle later this afternoon, in electronic form;
2. if you have submissions you want to file with the Court, we have been conversing with the following individual at the Court in respect of this matter - susan.woolley@Justice.gov.uk. You may wish to do the same; and
3. we will be filing our skeleton argument with the Court at 10:00am tomorrow morning and will provide you with a copy of the same. We should be grateful if you would send us your submissions at the same time – i.e., by 10:00am.

We encourage you to seek independent legal advice in relation to this case.

We reserve all of our client's rights, howsoever arising.

Kind regards,

Alex

Alexander Richardson
Senior Associate

+441612500149

+447799477442

For Pinsent Masons LLP

Pinsent Masons supports agile working, so please don't feel you need to respond to this email outside your working hours.



Pinsent Masons

A purpose-led professional services
business with law at the core

From: Daniel Kidby <d.f.p.kidby@outlook.com>
Sent: Wednesday, May 24, 2023 5:27 AM
To: Iona Wilson <Iona.Wilson@pinsentmasons.com>
Cc: Julian Diaz-Rainey <Julian.Diaz-Rainey@pinsentmasons.com>; Trevor Watkins <Trevor.Watkins@pinsentmasons.com>; Alexander Richardson (Litigation, Regulatory & Tax) <Alexander.Richardson@pinsentmasons.com>; Starkey, Amy <Amy.Starkey@thejockeyclub.co.uk>; Kerri Waters <kerri_waters@hotmail.com>
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