

IN THE MATTER OF AN INTENDED ACTION

IN THE HIGH COURT OF JUSTICE

QUEEN'S BENCH DIVISION

BEFORE THE HON MR JUSTICE BEATSON (Sitting in Private)

B E T W E E N :

(1) SMITHKLINE BEECHAM PLC

(2) BEECHAM GROUP PLC

(3) THE WELLCOME FOUNDATION LIMITED

(4) GLAXO OPERATIONS UK LIMITED

(5) GLAXO GROUP LIMITED

(6) GLAXOSMITHKLINE RESEARCH & DEVELOPMENT LIMITED

(7) GLAXO PROPERTIES LIMITED

(8) SMITH KLINE & FRENCH LABORATORIES LIMITED

(9) DEALCYBER LIMITED

(10) GLAXO FINANCE BERMUDA LIMITED

(11) GLAXO WELLCOME UK LIMITED

(12) WILLIAM FREDERICK TRUNDLEY for and on behalf of the Protected Persons

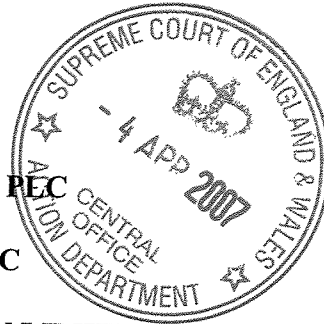
(as defined)

Intended Claimants

-and-

(1) GREG AVERY as representing all persons acting as members, participants or supporters or in the name of the unincorporated association known as Stop Huntingdon

Animal Cruelty ("SHAC")



(2) ROBIN WEBB as representing all persons acting as members, participants or supporters or in the name of the unincorporated association known as the Animal Liberation Front (“ALF”)

Intended Defendants

ORDER

PENAL NOTICE

IF YOU THE WITHIN NAMED DEFENDANTS DISOBEY THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED OR FINED OR HAVE YOUR ASSETS SEIZED OR YOU MAY BE FOUND TO BE GUILTY OF A CRIMINAL OFFENCE UNDER SECTION 3 OF THE PROTECTION OF HARASSMENT ACT 1997 WHICH IS AN ARRESTABLE OFFENCE BY VIRTUE OF SECTION 24 OF THE POLICE AND CRIMINAL EVIDENCE ACT 1984 FOR WHICH YOU MAY BE IMPRISONED OR FINED OR BOTH

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS ANY OF THE DEFENDANTS TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED FINED OR HAVE THEIR ASSETS SEIZED OR MAY BE FOUND GUILTY OF A CRIMINAL OFFENCE FOR WHICH THEY MAY BE IMPRISONED OR FINED OR BOTH

1. This is an injunction made against Stop Huntingdon Animal Cruelty (SHAC) and Animal Liberation Front) (ALF) (“the Defendants”) on [date] by Mr. Justice [] on the application of SmithKline Beecham PLC, Beecham Group PLC, The Wellcome Foundation Limited, Glaxo Operations UK Limited, Glaxo Group Limited, GlaxoSmithKline Research & Development Limited, Glaxo Properties Limited, Smith Kline & French Laboratories Limited, Deacyber Limited, Glaxo Finance Bermuda Limited, Glaxo Wellcome Pharmaceuticals UK Limited, William Frederick Trundley (“the Claimants”). The Judge read the witness statements listed in Schedule A and accepted the undertaking set out in Schedule B at the end of this Order.
2. The Defendants have the right to apply to vary or discharge this Order – see paragraph 24. Unless varied or discharged this Order will remain in force until the conclusion of the hearing on Wednesday 18 April 2007 or further Order of the Court whichever is earlier.

INTERPRETATION OF THIS ORDER

3. In this Order “Protected Persons” means the following persons and all and any of them:
 - (1) the Twelfth Claimant
 - (2) the directors employees agents and subcontractors of GlaxoSmithKline plc or of any of its subsidiaries;

- (3) the families servants or agents of the persons mentioned in subparagraph (2) above;
 - (4) all persons (other than a Protestor) seeking to visit or work at the business premises of the First to Eleventh Claimants or any home or residence belonging to or occupied by any of the persons mentioned in subparagraph (2) above.
4. In this Order "Protestor" or "Protestors" mean:
- (1) all persons acting as members, participants and supporters or in the name of Stop Huntingdon Animal Cruelty ("SHAC") or the Animal Liberation Front ("ALF");
 - (2) any other person, whether by himself his servants or agents, who is acting in concert with any person mentioned in subparagraph (1) above with a view to exposing, deterring, obstructing or preventing:
 - (a) the conduct of experimentation on live animals by Huntingdon Life Sciences, GlaxoSmithKline plc or any of its subsidiaries or
 - (b) the business relationship between Huntingdon Life Sciences and GlaxoSmithKline plc and its subsidiaries;
 - (3) any other person protesting:

(a) against the experimentation on live animals by Huntingdon Life Sciences, by GlaxoSmithKline plc or any of its subsidiaries or

(b) against the business relationship between Huntingdon Life Sciences and GlaxoSmithKline plc and its subsidiaries.

5. In this order “harass” has the same meaning as in the Protection from Harassment Act 1997.
6. In this order Exclusion Zones means the areas coloured pink yellow and blue on the plans attached to this order and Roads mean those parts of the Exclusion Zones coloured blue.
7. In this order Demonstration Areas means those parts of the public footpath indicated by arrows on the plans attached to this order.
8. In this order Local Police Stations means in respect of each Demonstration Area the appropriate police station named on the Schedule D to this order;
9. In this order the masculine includes the feminine and neuter where appropriate.
10. In this Order:
 - (1) references to “the Defendants” and to “the Protestors” means all or one or more of them; and

- (2) a requirement that “the Defendants or “the Protestors” do or do not do something applies to all of them.

11. In this Order:

- (1) Defendants or Protestors who are ordered not to do something must not do so themselves or in any other way and in particular must not do so through others acting on their behalf or on their instructions or with their encouragement; and
- (2) Defendants or Protestors who are corporations who are ordered not to do something must not do so by themselves or by their directors, officers, or agents or in any other way.

12. This Order is effective against any of the Defendants upon whom it is served or who are given notice of it.

IT IS ORDERED THAT:

13. The Protestors be restrained from pursuing any course of conduct such as amounts to harassment of the Protected Persons within the meaning of the Protection from Harassment Act 1997.
14. In particular the Protestors be restrained from doing, causing, permitting, encouraging or assisting any of the following:

- (1) assaulting, harassing, molesting, threatening or otherwise interfering with any Protected Person;
- (2) intentionally photographing any Protected Person or his vehicle;
- (3) making any abusive or threatening communication whether orally, by telephone, in writing, by facsimile, or by e-mail to any Protected Person;
- (4) knowingly picketing, demonstrating or loitering within 50 yards of any residence of any Protected Person;
- (5) publishing by any means whatsoever names, addresses, telephone numbers, fax numbers, e-mail addresses, car or other vehicle registration numbers or any other material serving to identify a Protected Person or to publish his personal details

PROVIDED THAT as and when a Protected Person is identified as such for the purposes of a newspaper article or a radio or television programme there shall be no restraint upon repetition of that which is so featured in the media nor upon the terms of any media response;

- (6) inciting, compelling or otherwise seeking to persuade any Protected Person against his will from doing something he is entitled or required to do;
- (7) coming into or remaining in the Exclusion Zones or any of them

PROVIDED THAT a demonstration may be conducted at intervals of no less than 28 days upon each of the Demonstration Areas on terms that:

- (a) the maximum number of Protestors present shall not exceed 30 persons at each Demonstration Area except in the case of the property owned by the Claimants at Stevenage, Ware and Worthing where the maximum number of Protestors present shall not exceed 20 persons at each Demonstration Area ;
- (b) each demonstration shall not take place only within the hours of 10am to 4pm and shall last no more than 4 hours
- (c) the Protestors be restrained for the duration of the demonstration from using any megaphone, klaxon, siren, whistle, drum, noise amplification device or any other instrument or other appliance used or capable of being used to generate noise;
- (d) the Protestors may not park any vehicle within any Exclusion Zone or within half a mile of the Demonstration Area save that one car may be driven to and from the Demonstration Area so as to be parked there for the demonstration at a point identified by attending Police Officers
- (e) the Protestors shall give 24 hours prior notice of their intention so to demonstrate and of the registration of any car that is to be parked in the immediate vicinity of the Demonstration Area respectively to the Local Police Station;

AND PROVIDED THAT nothing in this order shall prevent Protestors from passing and re-passing in vehicles along the Roads otherwise than for the purposes of any protest or demonstration

SUPPLEMENTARY ORDERS

15. The Protected Persons be represented by the Twelfth Claimant pursuant to CPR 19.6.
16. All persons acting as members, participants or supporters or in the name of Stop Huntingdon Animal Cruelty ("SHAC") be represented by the First Defendant.
17. All persons acting as members, participants or supporters or in the name of the Animal Liberation Front ("ALF") by represented by the Second Defendant.
18. This order is binding on all Defendants and Protestors pursuant to CPR 19.6(4)(a).
19. The Claimants be permitted to enforce this order against the Protestors pursuant to CPR 19.6(4)(b).
20. Pursuant to CPR 6.8 the Claimants be permitted to effect service of the Claim Form, an application notice for the continuation of the injunctive relief hereby granted returnable on Wednesday 18 April 2007, this order and copies of the witness statements set out in Schedule B hereto:
 - (1) on the First Defendant by sending them by pre-paid ordinary first class post in a sealed envelope addressed to him at Stop Huntingdon Animal Cruelty c/o

FRIEND, 89 Bush Road, East Peckham, Tonbridge, Kent, TN12 5LJ and to 6 Boat Lane, Evesham, Worcestershire WR11 and (save for the exhibits to witness statements) by e-mail to info@shac.net;

- (2) on the Second Defendant by sending them by pre-paid ordinary first class post in a sealed envelope addressed to him at Animal Liberation Front Supporters Group, BCM 1160, London WC1N 3XX and c/o Moss & Co solicitors, 17 Lower Clapton Road, London E5 0NS and (save for the exhibits to witness statements) by e-mail to info@alfsg.org.uk.

The said documents shall be deemed to be served on the fifth day after posting or electronic transmission.

21. Pursuant to CPR 6.8 the Claimants be permitted to effect service of this Order on the Protestors by exhibiting the same on posts around the boundaries of the First to Eleventh Claimants' properties and this Order shall be deemed to be so served immediately upon being so exhibited.
22. It is ordered that the First Defendant do procure forthwith that the words set out in Schedule C at the end of this Order appear on the home page on www.shac.net.
23. It is ordered that the Second Defendant do procure forthwith that the words set out in Schedule C at the end of this Order appear on the home page of www.animalliberation.net.

24. The Defendants and any person served with or notified of this Order may apply to the Court at any time to vary or discharge this order (or so much of it as affects that person) but anyone wishing to do so must first inform the Claimants: The General Counsel, GlaxoSmithKline Plc, 980 Great West Road, Brentford TW8 9GS telephone 020 8047 5000 fax 020 8047 6906 e-mail corporate.media1@gsk.com at least 48 hours beforehand.
25. Costs be reserved to the hearing on [date].

SCHEDULE A

26. Witness statement dated 2 April 2007 of William Frederick Trundley
27. Witness statement dated 3 March 2007 of Steven Pearl

SCHEDULE B

- 28.
- (1) If the court later finds that this Order has caused loss to the Defendants and decides that the Defendants should be compensated for that loss GlaxoSmithKline plc will comply with any order the Court may make.
- (2) The Intended Claimants undertake forthwith:

- (a) to issue and serve a Claim Form in the form attached hereto together with an application notice for hearing on Wednesday 18 April 2007 and
- (b) the evidence in support of the application for hearing on Wednesday 18 April 2007

SCHEDULE C

29. “The High Court of England and Wales has made an order prohibiting all harassing activities against the Protected Persons as defined in the order including the directors, employees, families, servants, representatives, agents and visitors of GlaxoSmithKline plc and all of its subsidiaries. This Order protects Protected Persons at their workplaces, their homes and elsewhere. We ask all activists strictly to comply with this order. [Click here to see the full terms of this order.](#)” [See Note]

[Note: the full terms of the Order are to be set out on a separate webpage linked from here.]

SCHEDULE D

Site	Police Station	Telephone Number
Barnard Castle	Durham Constabulary	0845 606 0365
Beckenham	Beckenham Police Station	01689 891 212
Coleford	Coleford Police Station	0845 090 1234
Crawley	Crawley Police Station	0845 607 0999
Dartford	Dartford Police Station	01622 690 690
Greenford	Greenford Police Station	020 8810 1212
GSK House	Brentford Police Station	020 8577 1212
Harlow	Harlow Police Station	01279 641 212
Maidenhead	Maidenhead Police Station	0845 8 505 505

Slough	Slough Police Station	0845 8 505 505
Stevenage	Stevenage Police Station	0845 33 00 222
Stockley Park	Uxbridge Police Station	01895 251 212
The Frythe	Welwyn Garden City Police Station	0845 33 00 222
Tonbridge	Tonbridge Police Station	01622 690 690
Ulverston	Ulverston Police Station	0845 33 00 247
Ware (Manufacturing & R&D) ***	Hertfordshire and Ware Police Station	0845 33 00 222
Weybridge	Esher Police Station	0845 125 2222
Worthing	Worthing Police Station	0845 607 0999

[Note: the full terms of the Order are to be set out on a separate webpage linked from here.]

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Harlow	Harlow Police Station	01279 641 212
M Maidenhead	M Maidenhead Police Station	0845 8 505 505
Slough	Slough Police Station	0845 8 505 505
Stevenage	Stevenage Police Station	0845 33 00 222
Stockley Park	Uxbridge Police Station	01895 251 212
The Frythe	Welwyn Garden City Police Station	0845 33 00 222
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Ware (Manufacturing & R&D) ***	Hertfordshire and Ware Police Station	0845 33 00 222
Weybridge	Esher Police Station	0845 125 2222
Worthing	Worthing Police Station	0845 607 0999



Claim Form

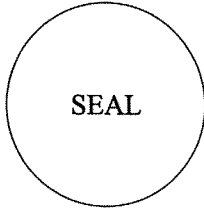
IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION
ROYAL COURTS OF JUSTICE

ASSIGNED MASTER
ALL CORRESPONDENCE TO BE ADDRESSED TO THE COURT MANAGER

	<i>for court use only</i>
Claim No.	
Issue Date	

Claimant (s)

SmithKline Beecham PLC
 Beecham Group Plc
 The Wellcome Foundation Limited
 Glaxo Operations UK Limited
 Glaxo Group Limited
 Glaxosmithkline Research & Development Limited
 Glaxo Properties Limited
 Smith Kline & French Laboratories Limited
 Dealcyber Limited
 Glaxo Finance Bermuda Limited
 Galxo Welcome Pharmaceuticals UK Limited
 William Frederick Trundley for and on behalf of the Protected Persons (as defined)

**Defendant (s)**

Greg Avery as representing all persons acting as members participants or supporters or in the name of the unincorporated association known as "Stop Huntingdon Animal Cruelty" (SHAC)

Robin Webb as representing all persons acting as members participants or supporters or in the name of the unincorporated association known as the Animal Liberation Front ("ALF")

Brief details of claim

AGAINST TRESPASS AND

The Claimants seek injunctive relief pursuant to the Protection from Harassment Act 1997

Value
 The claim has a non monetary value

Defendant's name and address

	£
Amount claimed	
Court fee	400.00
Solicitor's costs	
Total amount	400.00

Claim No. _____

Does, or will, your claim include any issues under the Human Rights Act 1998? Yes No

Particulars of Claim

To Follow

Statement of Truth

* (I believe) ~~XXXXXXXXXXXXXXXXXXXX~~ that the facts stated in these particulars of claim are true.

* I am duly authorised by the claimant to sign this statement

Full name William Frederick Trundley

Name of claimant's solicitor's firm _____

signed _____ position or office held _____

*(Claimant) ~~XXXXXXXXXXXXXXXXXXXX~~ (if signing on behalf of firm or company)

**delete as appropriate*

GlaxoSmithKline
GSK House
980 Great West Road
Brentford TW8 9GS

Claimant's or claimant's solicitor's address to which documents or payments should be sent if different from overleaf including (if appropriate) details of DX, fax or e-mail.