

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

APPLICATION BUNDLE

Tab	Document	Date	Page Number
Application			
1.	Sealed Claim Form and additional sheet	22 May 2023	3
2.	Sealed Application Notice	22 May 2023	9
3.	Draft Order and Marked Plan	N/A	14
4.	Response Pack	N/A	25
5.	First Witness Statement of Nevin Truesdale and Exhibit	22 May 2023	30
6.	First Witness Statement of Amy Starkey and Exhibit	22 May 2023	163
7.	First Witness Statement of Dickon White and Exhibit	22 May 2023	188
8.	First Witness Statement of Simon Knapp	22 May 2023	222
Service			
9.	First Witness Statement of Julian Diaz-Rainey and Exhibit	24 May 2023	227
10.	Certificate of Service for the First Respondent	24 May 2023	253
11.	Certificate of Service for Respondents (2)-(8)	24 May 2023	255
Correspondence			
12.	Email from the First Respondent to Pinsent Masons	24 May 2023 04:27	257
13.	Email from the First Respondent to Pinsent Masons	24 May 2023 10:44	260
14.	Email from Ms. Kerri Waters to Pinsent Masons	24 May 2023 11:52	264
15.	Email from Pinsent Masons to the First Respondent	24 May 2023 16:17	268



Claim Form (CPR Part 8)

In the High Court of Justice, Business and Property
Courts, Business List.

Claim no.

Fee Account no.

Help with Fees -
Ref no. (if appli-
cable)

H W F -



BL-2023-000713

Claimant

Jockey Club Racecourses Limited
Sandown Park Racecourse
Portsmouth Road
Esher
Surrey
England
KT10 9AJ



Defendant(s)

Please see attached.

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

Details of claim (see also overleaf)

Please see attached.

Defendant's
name and
address

The Claimant will effect personal service
on the First Defendant at [REDACTED]
and seeks an order for permission to effect
service on the Second to Eighth
Defendants by alternative means as set
out in the draft Order.

	£
Court fee	
Legal representative's costs	
Issue date	

For further details of the courts www.gov.uk/find-court-tribunal.
When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

Claim no.	
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Details of claim (continued)

Pinsent Masons LLP
30 Crown Place
Earl Street
London
EC2A 4ES

Claimant's or claimant's legal representative's address to which documents should be sent if different from overleaf. If you are prepared to accept service by DX, fax or e-mail, please add details.

Statement of Truth

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.

I believe that the facts stated in these particulars of claim are true.

The Claimant believes that the facts stated in these particulars of claim are true. **I am authorised** by the claimant to sign this statement.

Signature



Claimant

Litigation friend (where claimant is a child or a Protected Party)

Claimant's legal representative (as defined by CPR 2.3(1))

Date

Day

22

Month

05

Year

2023

Full name

Julian Diaz-Rainey

Name of claimant's legal representative's firm

Pinsent Masons LLP

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

Partner

BETWEEN:

JOCKEY CLUB RACECOURSES LIMITED

Claimant/Applicant

and

- (1) DANIEL FRANK PETER KIDBY OF [REDACTED]
- (2) PERSONS UNKNOWN ENTERING THE AREA DESCRIBED BELOW AS THE "RACE TRACK" ON THE DAY OF A "RACING FIXTURE", EXCEPT AT "CROSSING POINTS" WITH "AUTHORISATION", AS DESCRIBED BELOW
- (3) PERSONS UNKNOWN ENTERING AND/OR REMAINING ON ANY "CROSSING POINTS" WITHOUT "AUTHORISATION" ON THE DAY OF A "RACING FIXTURE", AS DESCRIBED BELOW
- (4) PERSONS UNKNOWN ENTERING THE AREA DESCRIBED BELOW AS THE "PARADE RING" WITHOUT "AUTHORISATION" ON THE DAY OF A "RACING FIXTURE", AS DESCRIBED BELOW
- (5) 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 TRACK" WITHOUT "AUTHORISATION" ON THE DAY OF A "RACING FIXTURE", AS DESCRIBED BELOW
- (6) PERSONS UNKNOWN INTENTIONALLY OBSTRUCTING THE "HORSE RACES", AS DESCRIBED BELOW
- (7) PERSONS UNKNOWN INTENTIONALLY CAUSING ANY OBJECT TO ENTER ONTO AND/OR REMAIN ON THE "RACE TRACK" WITHOUT "AUTHORISATION" ON THE DAY OF A "RACING FIXTURE", AS DESCRIBED BELOW
- (8) PERSONS UNKNOWN INTENTIONALLY ENDANGERING ANY PERSON AT THE LOCATION DESCRIBED BELOW AS THE "EPSOM RACECOURSE" ON THE DAY OF A "RACING FIXTURE", AS DESCRIBED BELOW

Defendants/Respondents

CLAIM FORM

1. For the purpose of this Claim Form:
 - 1.1. The "Act" means the Epsom and Walton Downs Regulation Act 1984.
 - 1.2. The "Byelaws" means the Byelaws made by The Epsom & Walton Downs Conservators on 18 October 2005, by virtue of s. 11 of the Act.

- 1.3. The “**Plan**” means the the aerial photographs of the Epsom Racecourse and the markings thereupon, appended to this Claim Form.
- 1.4. The “**Epsom Racecourse**” means the area where the Claimant holds Racing Fixtures, within the red line marked on the Plan.
- 1.5. “**Racing Fixture**” means an Authorised Meeting within the meaning of s. 14 of the Act, being a race meeting held on up to 16 days in any one year at the Epsom Racecourse, including Oaks Day and Derby Day.
- 1.6. “**Horse Races**” means any and all horse races taking place on the day of a Racing Fixture.
- 1.7. The “**Race Track**” means the area between the crowd barriers on either side of the stretch of land marked with a yellow dotted line, starting at point (C) and ending at point (D) on the Plan.
- 1.8. The “**Crossing Points**” mean the 10 points at which members of the public may cross from one side of the Race Track to another with Authorisation, marked in blue on the Plan.
- 1.9. “**Authorisation**” means authorisation given to any member of the public to be in a particular area at the Epsom Racecourse at a particular time, whether by a steward, police officer, and/or any agent of Jockey Club Racecourses Limited.
- 1.10. The “**Stables**” means the buildings and area where the horses are accommodated before the races, marked at point (A) on the Plan.
- 1.11. The “**Parade Ring**” means the area where horses parade ahead of the races, marked at point (B) on the Plan.
- 1.12. The “**Horse & Jockey Entrance**” means the point at which horses and jockeys enter the Race Track, marked at point (C) on the Plan.
- 1.13. The “**Horses’ Route to the Parade Ring**” means the pathway by which the horses are led from the Stables to the Parade Ring, marked with a yellow dotted line, starting at point (A) and ending at point (B) on the Plan.
- 1.14. The “**Horses’ Route to the Race Track**” means the route which the horses take from the Parade Ring to the Race Track, marked with a yellow dotted line, starting at point (B) and ending at point (C) on the Plan.

The Claimant claims:

2. An injunction to restrain the Defendants, on the day of any Racing Fixture, from:
 - 2.1. committing acts of trespass by:
 - 2.1.1. entering the Race Track, except at authorised Crossing Points;
 - 2.1.2. entering and/or remaining on any Crossing Points without Authorisation;

- 2.1.3. entering the Parade Ring without Authorisation;
- 2.1.4. entering and/or remaining on any part of the Horses' Route to the Parade Ring, without Authorisation;
- 2.1.5. entering and/or remaining on any part of the Horses' Route to the Race Track, without Authorisation; and
- 2.2. breaching s. 2(2)(e) of the Byelaws by:
 - 2.2.1. intentionally obstructing the Horse Races;
 - 2.2.2. intentionally causing any object to enter onto and/or remain on the Race Track without Authorisation;
 - 2.2.3. intentionally endangering any person at the Epsom Racecourse.
- 3. Further or other relief.
- 4. Costs.

N244

Application notice

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>

information- charter

**Notice of hearing Application will be heard at 7 Rolls Building, London, EC4A 1NL
Date: 26/05/2023
Time: N.B. 10:30 AM
Court: 10**



Name of court The High Court of Justice, The Business and Property Courts of England and Wales, Chancery Division	Claim no. 22 May 2023
Fee account no. (if applicable)	Help with Fees - Ref. no. (if applicable) BL-2023-000713
	H W F - - - - -
Warrant no. (if applicable)	
Claimant's name (including ref.) Jockey Club Racecourses Limited	
Defendant's name (including ref.) (1) Daniel Frank Peter Kidby (2) Persons Unknown entering the area described in the draft Order as the "Race Track" on the day of a "Racing Fixture", except at "Crossing Points" with "Authorisation", as described in the draft Order (3) Persons Unknown entering and/or remaining on any "Crossing Points" without "Authorisation" on the day of a "Racing Fixture", as described in the draft Order (4) Persons Unknown entering the area described in the draft Order as the "Parade Ring" without "Authorisation" on the day of a "Racing Fixture", as described in the draft Order (5) Persons Unknown entering and/or remaining on any part of the areas described in the draft Order as the "Horses' Route to the Parade Ring" and/or the "Horses' Route to the Race Track" without "Authorisation" on the day of a "Racing Fixture", as described in the draft Order (6) Persons Unknown intentionally obstructing the "Horse Races", as described in the draft Order (7) Persons Unknown intentionally causing any object to enter onto and/or remain on the "Race Track" without "Authorisation" on the day of a "Racing Fixture", as described in the draft Order (8) Persons Unknown intentionally endangering any person at the location described in the draft Order as the "Epsom Racecourse" on the day of a "Racing Fixture", as described in the draft Order	
Date	22 May 2023

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

Pinsent Masons 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?

1. An interim injunction restraining the Defendants from:
 - a. committing acts of trespass on the Claimant's land, as set out at subparagraphs 2(1)-(5) and 2(5)-(7) of the draft Order;
 - b. breaching s. 2(2)(e) of the Byelaws made by The Epsom & Walton Downs Conservators by virtue of s. 11 of the Epsom and Walton Regulation Act 1984 (18 October 2005), as set out at subparagraphs 2(6)-(8) of the draft Order.
2. Permission to serve the Claim Documents (as defined in the draft Order) and the Order on the Second to Eighth Defendants by alternative means as set out at paragraph 3 of the draft Order, pursuant to CPR 6.15 and 6.27 (and for the purposes of 81.4(c) and (d)).
3. Directions for future case management.

The reasons for seeking the relief are set out in the witness statements listed under section 10 below.

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 telephone hearing

6. How long do you think the hearing will

Hours

Minutes

last? Is this time estimate agreed by all parties?

Yes

No

7. Give details of any fixed trial date or period

8. What level of Judge does your hearing need?

High Court Judge

9. Who should be served with this application?

Each of the Defendants, as set out at paragraph 3 of the draft Order.

9a. Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.

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.

Please see the attached witness statements of:

1. Nevin Truesdale, the Claimant's Group Chief Executive;
2. Dickon White, the Claimant's Aintree and North-West Regional Director;
3. Amy Starkey, the Claimant's Managing Director; and
4. Simon Knapp, the Claimant's Senior Veterinary Surgeon for London Region Races.

Statement of Truth

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.

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

22

Month

05

Year

2023

Full name

Julian Diaz-Rainey

Name of applicant's legal representative's firm

Pinsent Masons 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

30 Crown Place

Second line of address

Earl Street

Town or city

London

County (optional)

Postcode

E C 2 A 4 E S

If applicable

Phone number

+44 (0) 20 7418 7000

Fax number

DX number

Your Ref.

JDR\645003.07183

Email

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

Case No. [xxx]

BETWEEN:

JOCKEY CLUB RACECOURSES LIMITED

Claimant/Applicant

and

- (1) DANIEL FRANK PETER KIDBY
- (2) PERSONS UNKNOWN ENTERING THE AREA DESCRIBED BELOW AS THE "RACE TRACK" ON THE DAY OF A "RACING FIXTURE", EXCEPT AT "CROSSING POINTS" WITH "AUTHORISATION", AS DESCRIBED BELOW
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Defendants/Respondents

[Draft] ORDER FOR AN INJUNCTION

PENAL NOTICE

IF YOU THE WITHIN NAMED DEFENDANTS OR ANY OF YOU DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED, HAVE YOUR ASSETS SEIZED

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing the acts set out in this Order. You should read it very carefully. You are advised to consult a solicitor as soon as possible. You have the right to ask the Court to vary or discharge this Order.

UPON the Claimant's application by application notice dated 22 May 2023 for an interim injunction ("the Application").

AND UPON the court reading the Application and the Witness Statements listed in Schedule 1 to this Order.

AND UPON the Court hearing Leading Counsel for the Claimant.

IT IS ORDERED that:

1. For the purpose of this Order:

- (1) The "Act" means the Epsom and Walton Downs Regulation Act 1984.
- (2) The "Byelaws" means the Byelaws made by The Epsom & Walton Downs Conservators on 18 October 2005, by virtue of s. 11 of the Act.
- (3) The "Plan" means the the aerial photographs of the Epsom Racecourse and the markings thereupon, appended to this [draft] Order.
- (4) The "Epsom Racecourse" means the area where the Claimant holds Racing Fixtures, within the red line marked on the Plan.
- (5) "Racing Fixture" means an Authorised Meeting within the meaning of s. 14 of the Act, being a race meeting held on up to 16 days in any one year at the Epsom Racecourse, including Oaks Day and Derby Day.
- (6) "Horse Races" means any and all horse races taking place on the day of a Racing Fixture.
- (7) The "Race Track" means the area between the crowd barriers on either side of the stretch of land marked with a yellow dotted line, starting at point (C) and ending at point (D) on the Plan.
- (8) The "Crossing Points" mean the 10 points at which members of the public may cross from one side of the Race Track to another with Authorisation, marked in blue on the Plan.
- (9) "Authorisation" means authorisation given to any member of the public to be in a particular area at the Epsom Racecourse at a particular time, whether by a steward, police officer, and/or any agent of Jockey Club Racecourses Limited.
- (10) The "Stables" means the buildings and area where the horses are accommodated before the races, marked at point (A) on the Plan.

- (11) The “Parade Ring” means the area where horses parade ahead of the races, marked at point (B) on the Plan.
- (12) The “Horse & Jockey Entrance” means the point at which horses and jockeys enter the Race Track, marked at point (C) on the Plan.
- (13) The “Horses’ Route to the Parade Ring” means the pathway by which the horses are led from the Stables to the Parade Ring, marked with a yellow dotted line, starting at point (A) and ending at point (B) on the Plan.
- (14) The “Horses’ Route to the Race Track” means the route which the horses take from the Parade Ring to the Race Track, marked with a yellow dotted line, starting at point (B) and ending at point (C) on the Plan.
- (15) The “Claim Documents” means the Application Notice, the Witness Statements listed at Schedule 1 to this Order, and the Claim Form.

Injunction in force

2. Until judgment or further order, on the day of any Racing Fixture at the Epsom Racecourse (which, for the avoidance of doubt, includes Oaks Day on 2 June 2023 and Derby Day on 3 June 2023), the Respondents must not:
 - (1) Enter the Race Track, except at authorised Crossing Points;
 - (2) Enter and/or remain on any Crossing Points without Authorisation;
 - (3) Enter the Parade Ring without Authorisation;
 - (4) Enter and/or remain on any part of the Horses’ Route to the Parade Ring, without Authorisation;
 - (5) Enter and/or remain on any part of the Horses’ Route to the Race Track, without Authorisation;
 - (6) Intentionally obstruct the Horse Races (contrary to s. 2(2)(e) of the Byelaws);
 - (7) Intentionally cause any object to enter onto and/or remain on the Race Track without Authorisation (contrary to s. 2(2)(e) of the Byelaws);
 - (8) Intentionally endanger any person at the Epsom Racecourse (contrary to s. 2(2)(e) of the Byelaws).

Service

3. Pursuant to CPR r.6.15, r.6.27 and r.81.4(2)(c) and (d) (being an order to dispense with personal service), and having regard to the steps already taken by the Claimant to bring the Claim Documents to the attention of the Second to Eighth Defendants by alternative means, service of the Claim Documents on the Second to Eighth Defendants shall be effected by the Claimant by:

- (1) posting digital copies of the Claim Documents on its website and the website of the Epsom Racecourse;
 - (2) affixing sealed copies of the Claim Documents in transparent containers in at least 2 conspicuous locations at public entrances to the Epsom Racecourse;
 - (3) providing digital copies to the organisation Animal Rising by email.
4. The Claimant shall effect personal service of the Order on the First Defendant.
 5. The Claimant shall attach a copy of the Order together with the Claim Documents in each of the steps set out in paragraph 3 above, thereby effecting good and sufficient service of this Order on the Second to Eighth Defendants, including for the purposes of CPR 81.4.

Directions

6. The Defendants and/or any other person affected by this Order may apply to the court at any time to vary or discharge it, but if they wish to do so they must give the Claimant's solicitors notice in writing at least 48 hours beforehand.
7. Any person applying to vary or discharge this Order must provide his or her full name and address, and an address for service.
8. The Claimants have liberty to apply to extend or vary this Order, or for further directions.
9. Costs reserved.

Name and Address of Claimant's Solicitors

10. The Claimant's solicitors are Pinsent Masons LLP, of 30 Crown Place, Earl Street, London, EC2A 4ES; +44 (0) 20 7418 7000.

Interpretation of this Order

11. In this Order the words "he" "him" or "his" include "she" or "her" and "it" or "its".
12. Where there are two or more Defendants then (unless the contrary appears)
 - (1) References to "the Defendant" mean both or all of them;
 - (2) An Order requiring "the Defendant" to do or not to do anything requires each Defendant to do or not to do it.

The Effect of this Order

13. A Defendant who is an individual who is ordered not to do something must not do it himself or in any other way. He must not do it through others acting on his behalf or on his instructions or with his encouragement.

[dated]

SCHEDULE 1

Witness statements

The Judge read the Witness Statements of the following individuals before making this Order:

- (1) Nevin Truesdale, Group Chief Executive of the Claimant;
- (2) Dickon White, Aintree and North-West Regional Director of the Claimant;
- (3) Amy Starkey, Managing Director of the Claimant;
- (4) Simon Knapp, Senior Veterinary Officer for London Region Races for the Claimant.

SCHEDULE 2

Undertaking given to the Court by the Claimant

If the Court later finds that this Order has caused loss to the Defendants or any other Party served with or notified of this Order and decides that the Defendants or other Party should be compensated for that loss, the Claimant will comply with any Order the Court may make.

SCHEDULE 3

Witness statement: service

The Claimants will by [] provide a witness statement confirming personal service of the Claim Documents and Order on the First Defendant.

Epsom Racecourse

a Stables

b Parade Ring

c Horse & Jockey Entrance to Race Track

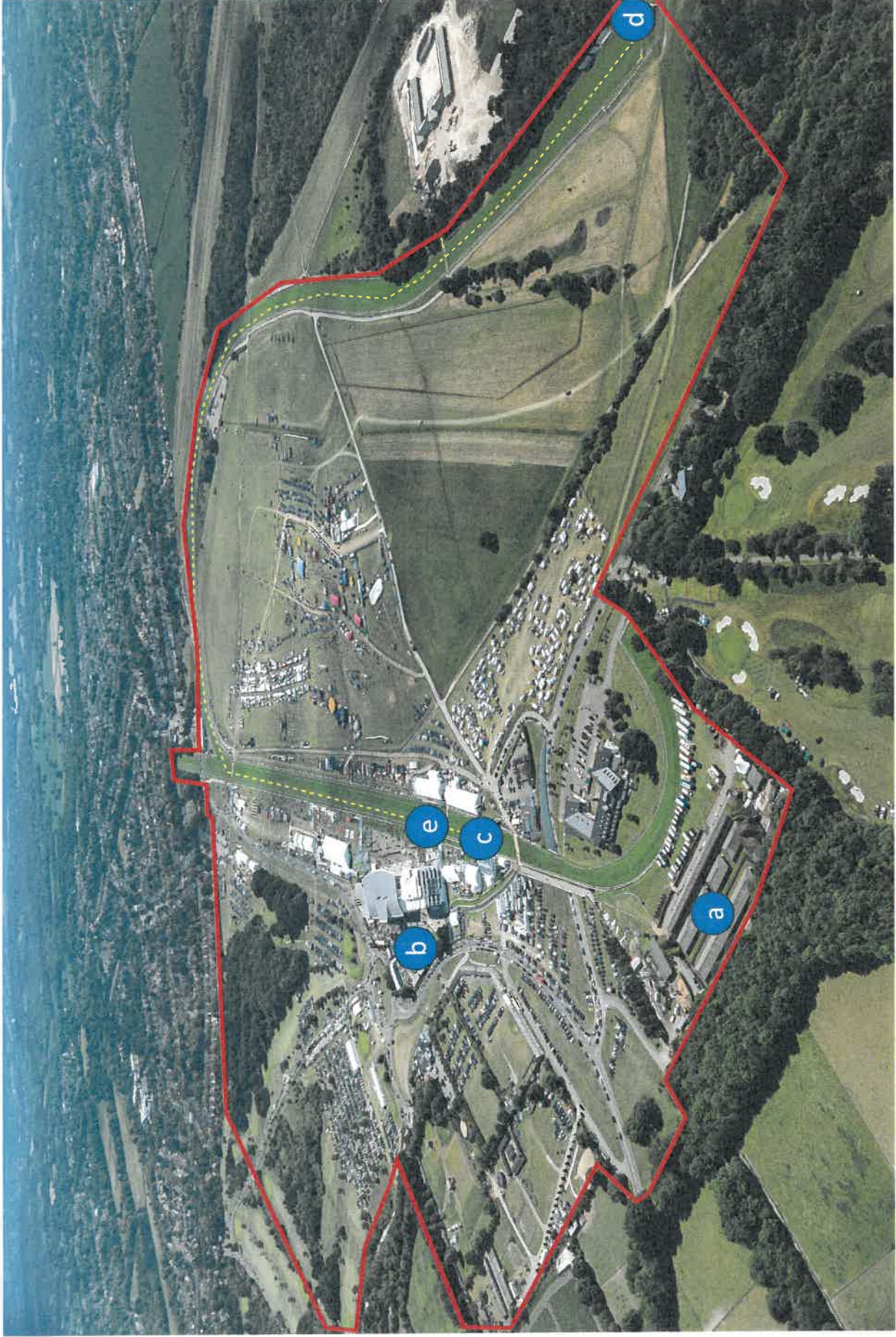
d Derby Start

e Race Finish

Horses will leave the stables (a) and make their way to the Parade Ring (b).

Jockeys will mount their horses in the Parade Ring (b) and walk their horse to the Race Track (c).

Jockeys will center their horse to the Derby Start (d) where they will enter the starting stalls and the race will commence.



Crossing Points
on the Race
Track



Access to
Parade Ring
from Stables

- a Stables
- b Parade Ring



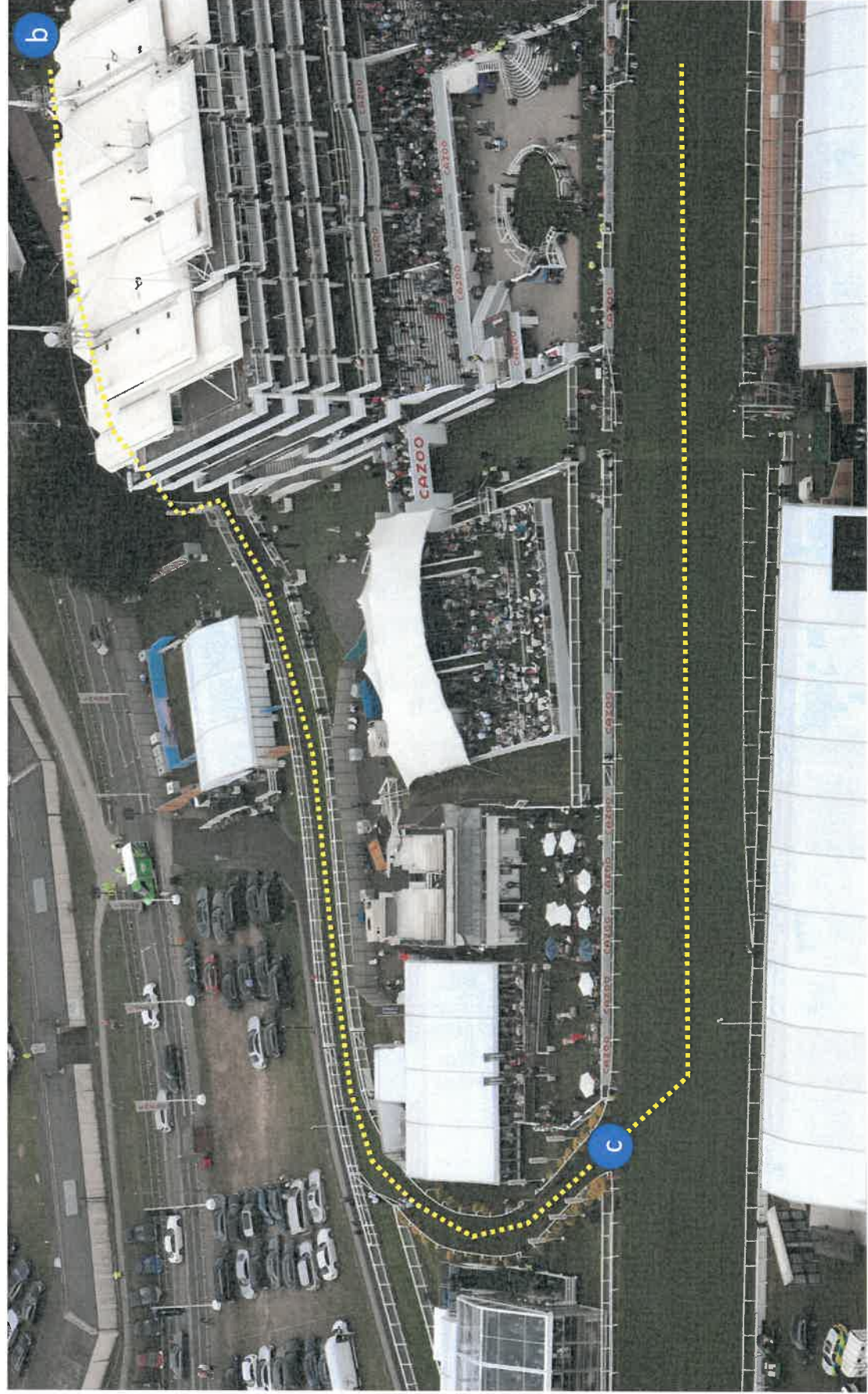


When the horses parade out, rope is held up by stewards to close off the areas of the Horses' Routes to the Parade Ring and to the Race Start which are not fenced off, so as to separate horses from spectators.

Access from
Parade Ring to
Race Track

- b** Parade Ring
- c** Horse & Jockey
Entrance to
Race Track





Access from
Parade Ring to
Race Track

b

Parade Ring

c

Horse & Jockey
Entrance to
Race Track

Acknowledgment of service (Part 8 claim)

You should read the 'notes for defendant' attached to the claim form which will tell you how to complete this form, and when and where to send it.

**Tick and complete sections A – E as appropriate.
In all cases you must complete sections F and G**

Name of court

Claim number

Name of claimant (including any reference)

Name of defendant (including any reference)

Section A

I do **not** intend to contest this claim

Give details of any order, direction, etc. you are seeking from the court.

Section B

I intend to contest this claim

Give brief details of any different remedy you are seeking.

Section C

I intend to dispute the court's jurisdiction

(Please note, any application must be filed within 14 days of the date on which you file this acknowledgment of service)

Section D

I object to the claimant issuing under this procedure

My reasons for objecting are:

Section E

I intend to rely on written evidence

My written evidence:

is filed with this form

will be filed within 14 days

Section F

Full name of defendant filing this acknowledgment

Section G

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 this section and any continuation sheets are true.
- The defendant** believes that the facts stated in this section and any continuation sheets are true. **I am authorised** by the defendant to sign this statement.

Signature

- Defendant
- Litigation friend
(where judgment creditor is a child or a protected party)
- Defendant's legal representative (as defined by CPR 2.3(1))

Date

Day	Month	Year
<input type="text"/>	<input type="text"/>	<input type="text"/>

Full name

Name of legal representative's firm

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

Defendant's or defendant's legal representative's address to which documents should be sent.

Building and street

Second line of address

Town or city

County (optional)

Postcode

--	--	--	--	--	--	--	--	--	--

If applicable

Phone number

DX number

Your reference

Email

Notes for defendant (Part 8 claim form)

Please read these notes carefully - they will help you to decide what to do about this claim.

- You have 14 days* from the date on which you were served with the claim form to respond to the claim
- If you **do not return** the acknowledgment of service, you will be allowed to attend any hearing of this claim but you will **not** be allowed to take part in the hearing unless the court gives you permission to do so
- Court staff can tell you about procedures but they cannot give legal advice. If you need legal advice, you should contact a solicitor or Citizens Advice Bureau immediately

Time for responding

The completed acknowledgment of service must be returned to the court office within *(14 days) () of the date on which the claim form was served on you.

If the claim form was:

- sent by post, the *(14 days) () begins 2 business days from the date of the postmark on the envelope.
- delivered or left at your address, the *(14 days) () begins the second business day after it was delivered.
- handed to you personally, the *(14 days) () begins on the second business day it was given to you.

Completing the acknowledgment of service

You should complete sections A - E as appropriate. In **all** cases you must complete sections F and G.

Section A - not contesting the claim

If you do **not** wish to contest the remedy sought by the claimant in the claim form, you should complete section A. In some cases the claimant may only be seeking the court's directions as to how to act, rather than seeking a specific order. In these circumstances, if you wish the court to direct the claimant to act in a certain way, give brief details.

Section B - contesting the claim

If you do wish to contest the remedy sought by the claimant in the claim form, you should complete section B. If you seek a remedy different from that sought by the claimant, you should give brief details in the space provided.

Section C - disputing the court's jurisdiction

You should indicate your intention by completing section C and filing an application disputing the court's jurisdiction within 14 days of filing your acknowledgment of service at the court. The court will arrange a hearing date for the application and tell you and the claimant when and where to attend.

Section D - objecting to use of procedure

If you believe that the claimant should not have issued the claim under Part 8 because:

- there **is** a substantial dispute of fact involved; and
- you do not agree that the rule or practice direction stated does provide for the claimant to use this procedure you should complete section D setting out your reasons in the space provided.

Section E - written evidence

Complete this section if you wish to rely on written evidence. You must send your written evidence to the court with your acknowledgment of service. It must be verified by a statement of truth or the court may disallow it. If you have agreed with the other party(ies)

an extension of time for filing your written evidence, a copy of your written agreement must be filed with your acknowledgment of service. Please note that the agreement can only extend time by 14 days from the date you file your acknowledgment of service.

Claims under section 1 of the Inheritance (Provision for Family and Dependents) Act 1975

A defendant who is a personal representative of the deceased must file and serve written evidence which must state to the best of that person's ability:

- full details of the value of the deceased's net estate, as defined in section 25 of the Act;
- the person or classes of person beneficially interested in the estate, and
 - the names and (unless they are parties to the claim) addresses of all living beneficiaries; and
 - the value of their interests in the estate so far as they are known;
- whether any living beneficiary (and if so, naming him) is a child or protected party within the meaning of Rule 21.1(2); and
- any facts which might affect the exercise of the court's powers under the Act.

Section F - name of defendant

Print your full name, or the full name of the defendant on whose behalf you are completing this form.

Serving other parties

You must send to any other party named on the claim form, copies of both the acknowledgment of service and any written evidence, at the same time as you file them with the court.

What happens next

The claimant may, within 14 days of receiving any written evidence from you, file further evidence in reply. On receipt of your acknowledgment of service, the court file will be referred to the judge for directions for the disposal of the claim. The court will contact you and tell you what to do next.

Statement of truth

This must be signed by you, by your solicitor or your litigation friend, as appropriate.

Where the defendant is a registered company or a corporation the statement must be signed by either the director, treasurer, secretary, chief executive, manager or other officer of the company or (in the case of a corporation) the mayor, chairman, president or town clerk.

*For claims under the Inheritance (Provision for Family and Dependents) Act 1975 the period is 21 days.

**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 NEVIN TRUESDALE

I, **NEVIN TRUESDALE**, of the Jockey Club Racecourses Limited, Sandown Park Racecourse, Portsmouth Road, Esher, Surrey, England, KT10 9AJ, **WILL SAY** as follows:

1. I am the Group Chief Executive of the Applicant. I have held this position since the end of August 2020.
2. I joined the Applicant in 2013 as Group Finance Director from Centrica, where I was Finance Director for British Gas's Residential Energy division. I previously worked at The AA and Ernst & Young and I am a graduate of the University of Cambridge. I am a qualified Chartered Accountant since 1998 and a Full Member of the Institute of Chartered Accountants in England and Wales.
3. I report to the Board (in the Applicant's case, known as the 'Stewards') and have overall management responsibility for the business of the Applicant, which includes all aspects of the Group's activity including the racecourses operations, gallops, national stud and racing welfare. I am also a non-executive director of Sports United Against Dementia, a charity with senior leaders across the sports industry using their contacts and influence to find a cure and fundraise for dementia.
4. I am duly authorised by the Applicant to make this statement on its behalf and in support of its application for injunctive relief.
5. 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.
6. There is now produced and shown to me marked exhibit "NT1" a bundle of true copy documents to which I refer in the course of this Witness Statement. Save where stated otherwise, references below to page numbers are to the pages of exhibit "NT1".

The Parties

7. The Jockey Club's (the Applicant's parent company incorporated by Royal Charter) existence dates back to the Eighteenth Century. The Applicant is now the largest commercial horseracing organisation in the United Kingdom. It owns and operates a number of well-known racecourses, as well as owning and exploiting the commercial

rights associated with those courses and the races which they host. It is governed by a Royal Charter and all of its profits are recycled into the sport. The Applicant runs over 340 racing fixtures a year across 15 different racecourses. Queen Elizabeth II was a patron of both the Applicant and the Thoroughbred Breeders' Association.

8. The Applicant is a limited liability company registered in England and Wales with the number 02909409 and whose registered address is Sandown Park Racecourse, Portsmouth Road, Esher, Surrey, England, KT10 9AJ. It has at all material times carried on the business of owning and operating horse racecourses, organising race meetings at such racecourses, owning and exploiting the commercial rights associated with such meetings and racecourses and related activities.
9. The Applicant employs more than 600 permanent staff and more than 3,000 people on an event basis throughout the UK across a diverse range of roles.
10. The known Defendant/Respondent is the co-founder of Animal Rising¹, an animal activist movement based in the United Kingdom ("AR"). It is my understanding that AR is not a corporate entity and that it has no particular hierarchical structure. Rather, AR is a collection of persons who all share a common purpose. I know very little of the other members of AR, or how many there may be, save that: i) the group has large followings on each of its social media accounts (65.5 thousand followers on Instagram, and 23.7 thousand on Twitter; and ii) it has been suggested to the Applicant that the group has over 1,000 active participants².
11. At the time of signing this witness statement, it appears that AR recruits new members via its website, <https://www.animalrising.org/>, where it encourages people to: i) join weekly talks, via Zoom, to learn about the group; ii) attend training courses run by AR, to engage in '*non-violence training*'; and iii) sign-up for its local groups. In respect of the latter, those interested are asked to complete a registration form that asks for, *inter alia*, the person's name, their email address, their mobile phone number and, particularly relevant for the purposes of this application, whether the interested individual would '*like to disrupt the races at Epsom Derby (03/06)*'.³ Further, at the time of writing this, there is a banner at the top of the AR website stating "*TAKE ACTION FOR ALL LIFE: DISRUPT THE EPSOM DERBY. JOIN US ON THE TRACKS*". Clicking on the link behind the wording "*JOIN US ON THE TRACKS*" takes one to a form⁴ which states *inter alia* "*Join us on the tracks of the Epsom Derby! We'll be disrupting the Epsom Derby to continue the conversation we started at the Grand*

¹ <https://www.instagram.com/p/CrJfJV9Klo7/> - page 1 of NT1

² <https://www.dailymail.co.uk/news/article-12106435/Militant-animal-rights-activists-vow-sabotage-Epsom-Derby-target-unpoliceable-racetrack.html> - page 2 of NT1

³ <https://www.animalrising.org/get-involved> pages 3 - 8 of NT1

⁴ https://docs.google.com/forms/d/e/1FAIpQLSfvckRfv8DqgBBphatMuh98Y2X_UKU6_Nwohz9jLS1uWJm1RA/viewform pages 9-11 of NT1

National. Be one of those to make history and achieve meaningful change for all life, join us on the tracks.”

12. What is known about AR and the known Respondent is that they are actively seeking to disrupt horseracing. This is abundantly clear from the website and social media per the above and:
 - 12.1 the actions of AR and the known Respondent at Aintree Racecourse (operated by the Applicant) ahead of the 2023 Grand National, which took place on Saturday 15 April 2023 (the “**2023 Grand National**”). I briefly address the incidents that took place at the 2023 Grand National at paragraphs 38 to 41 below, but a more detailed account is provided in the witness statement of Dickon White, the Applicant’s Aintree and North-West Regional Director, who manages Aintree Racecourse and who witnessed the actions of AR and the known Respondent first hand;
 - 12.2 the meetings and conversations the Applicant’s representatives have had with the known Respondent and members of AR, during which it has been made clear to the Applicant that AR’s intention is to disrupt horseracing and to prevent races from going ahead, in particular a forthcoming race at Epsom Downs Racecourse, Tattenham Corner Rd, Epsom KT18 5LQ (the “**Racecourse**”). I briefly address these communications at paragraphs 49 to 51 below, but a more detailed account is provided in the witness statement of Amy Starkey, the Applicant’s Regional Director – East, who has had several interactions with the known Respondent and AR; and
 - 12.3 A Mail on Sunday article dated 21 May 2023 (page 2 of NT1), amongst other things, reports that AR will try to break on to the Racetrack in an attempt to delay or cancel the Derby.

The Racecourse and Derby Festival

13. In 1994, the Applicant purchased the Racecourse. The key race in the calendar at the Racecourse is the Derby (also known as the Epsom Derby) which takes place on the first Saturday of June each year (the “**Derby**”). The Derby was first run in 1780 and is widely regarded as the World’s most prestigious flat horse race.
14. It is known as the People’s Race as it embraces people from all walks of life offering free access to the Derby from the Epsom Downs. Queen Elizabeth II rarely missed a Derby.
15. The Friday before the Derby is known as Ladies Day and features the Oaks, another of Britain’s five classic races. Both days are known together as the “**Derby Festival**”.

16. This year's Derby Festival will take place between Friday 2 and Saturday 3 June 2023 (the "**2023 Derby Festival**"), with the Derby scheduled to commence at 1:30pm on the second day (the "**2023 Derby**").
17. Approximately 100,000 people attend the Derby, with millions watching around the world including in Japan, Hong Kong and Australia.

The Racecourse – Proprietorship

18. An ownership plan is at page 12 of NT1, which is summarised as:

Land Description	Freehold / Leasehold	Title number
Land being Epsom Racecourse, Epsom Downs (but excluding any roads)	Leasehold	SY645094
Land being Epsom Downs and land lying to the South of Epsom Downs, Epsom	Freehold	SY229932
Land adjoining Golf Cottage, 84 Longdown Lane South, Epsom KT17 4JR	Freehold	SY691867
Land being Derby Stables, Derby Stables Road, Epsom	Freehold	SY640786
Land known as the Paddock, Langley Vale Road, Epsom KT18 5NQ	Freehold	SY251358
Land at Derby Arms Paddock, Downs Road, Epsom	Freehold	SY840946

19. While the Applicant owns the Racecourse, the land within it and around it is managed by the 'Conservators' pursuant to the Epsom and Walton Downs Regulation Act 1984 (the "**1984 Act**") and Epsom and Walton Downs Conservators Byelaws (the "**Byelaws**"). The Conservators were incorporated by the Epsom and Walton Downs Regulation Act 1936 with powers to regulate, preserve and control the Epsom Downs and Walton Downs. There are ten Conservators of which the Applicant holds three places.

The Racecourse – Geography

20. The Racecourse is split into various zones. The racetrack itself is unlike other racetracks as it is a horseshoe shape. The start line for the Derby is at the southwest corner, it then extends eastwards before turning northwards and finally westwards to the final straight in front of the grandstands. The racetrack is approximately 1 mile and 4 furlongs in length (the "**Racetrack**").

21. The area within the horseshoe is referred to as the "**Hill**". When the Derby Festival is on, the Hill is split into various sections including areas for parking, a funfair, a heliport and various enclosures.
22. Six aerial images are at pages 13 to 18 of NT1. Page 15 of NT1 shows the position of the stables marked at point 'a'. This is where the horses will start their 'journey' on their race day. They will then proceed along the yellow marked route, which is a dedicated 'horse walk' to point 'b' which is the Parade Ring. All horses entered for a particular race tend to go at the same time albeit in a "train" fashion. Occasionally, if requested by their trainer a horse may come later or earlier than the main bunch. The horses walk this journey, controlled by their handlers (stable staff), which is not always an easy task as the horses are highly strung athletes and are keen to race. The horses walk around the Parade Ring and wait for the jockeys to enter it. Once inside, the jockeys mount their horse and continue to circle in the Parade Ring for normally around 10 – 20 minutes. At page 17 of NT1 the next part of the journey, which is from the Parade Ring to the Racetrack is marked in yellow with point 'c' indicating the horse's entrance to the Racecourse.
23. When the horses leave the Parade Ring they cross over a short area of rubber horsewalk. Most of this pathway has fencing installed on either side. There are gaps in the fencing, such that when the horses are not walking through this area, spectators can pass through. When the horses are brought out, the pathway is closed off entirely by stewards holding up rope. At this point, no spectators are allowed within the horses' pathway. This is important to protect the spectators from the horses (which are at this point, ready to race), and the horses from the spectators (for example, from contamination risks if spectators try to touch the horses). The horses then go onto the grass "shute" area that is protected by crowd barriers on either side, before entering the Racetrack itself. Aerial photographs of this are at pages 16 and 18 of NT1.
24. Once on the Racetrack the horses canter to the Derby start, which is marked at 'd' on the aerial photograph at page 13 of NT1. The aerial photograph at page 14 depicts crossing points in blue. Spectators are only allowed to pass over these crossing points when given special authorisation to do so by stewards or representatives of the Jockey Club, for example, for limited periods between races. Ensuring that no one is on these crossing points other than at carefully prescribed times, is crucial for the safety of all those involved in the event, not least spectators, horses and jockeys.
25. The highest point of the Racetrack is at the top of end of the Racetrack, around the halfway point. The climb from the start of the Derby to the highest point is equivalent to the height of Nelson's Column, having reached this point the Racetrack then descends steeply around to the finish line. This, coupled with the geography of the Racecourse more generally, means that there are numerous points where it is

impossible to see all of the Racetrack. This presents a particular, additional danger for those intent on coming onto the Racetrack as it may be impossible for them to tell whether the race is underway. For example, if someone was stood on the far side of the grandstand, beyond the winning post, you would not be able to see the start.

26. On 4 June 1913, Emily Davison tragically lost her life at the Derby. She had entered the Racetrack at Tattenham Corner after some horses had already passed. Tattenham Corner is a blind corner, on a camber, and, therefore, of particular danger for those who enter the Racetrack at that point.
27. Unlike other racecourses, it is possible for the public, with no requirement for a ticket, to enter the Hill and other areas to watch the Derby. The Racecourse is notable in this regard and poses a unique set of challenges come the Derby Festival.

Horse Welfare

28. Equine safety is fundamental to everything the Applicant does and to the sport of horse racing. Everyone involved in horse racing loves horses and wants to see them properly looked after.
29. British Racing is one of the world's best regulated animal activities, with more than 6,000 people employed to look after the 15,000 horses in training, providing them with a level of care and a quality of life that is virtually unsurpassed by any other domesticated animal.
30. The Applicant continues to invest in its facilities to make sure that it offers equine participants the best possible experience. This ranges from investments in safe racing surfaces and cushioned horsewalks to state-of-the-art misting fans and washdown areas. Every aspect of care and safety is considered. The racing industry has heavily invested in statistical analysis of falls and fatalities in order that we can understand where the risks are and improve safety. 99.5% of horses that race finish safely.
31. Horse racing is usually only part of the full life of a thoroughbred racehorse. The Applicant supports Retraining of Racehorses (British horseracing's official charity for the welfare of former racehorses). There are currently more than 10,000 horses registered with Retraining of Racehorses as active in other equine disciplines outside of racing, including Polo, Showing, Dressage and Eventing, as well as those horses engaged in hacking and exercising.
32. The British Horseracing Authority (the "**BHA**") is the Government-recognised body responsible for the independent regulation of horseracing and welfare of participants is an important part of its work. In addition to the BHA, the Applicant works with an

independent board (the Horse Welfare Board) that advise and lobby on further improvements to equine welfare, holding the industry to account.

33. None of the fixtures held annually in Britain could take place unless key BHA welfare criteria have been satisfied. From a purely commercial point of view, we would not have a business if safety standards were not being met.
34. In relation to the Derby specifically, as I understand from discussing with Amy Starkey the Managing Director of Applicant, neither I nor Amy (during our combined 28 years of employment with the Applicant) has ever been questioned by the media in relation to the safety of horses at the Derby. It is a flat race and I understand that no horse has died at the Derby since 2006 – 16 runnings. On the day of the Derby, there is a full veterinary team on site, provided by the Racecourse. Further, the BHA also provide their own veterinary team. These teams are present at every point during the horses' journey and remain in close proximity throughout. They provide a high level of veterinary care.

Incidents Involving the Known Respondent and/or AR

2022 Derby

35. The 2022 running of the Derby took place on 2 June 2022 (the "**2022 Derby**").
36. Ahead of the 2022 Derby, approximately six protestors affiliated to the activist group 'Animal Rebellion' evaded the Racecourse's security and ran on to the Racetrack.⁵ According to Animal Rebellion's website, the purpose was to '*disrupt the race.*' The group also called for '*an end to horseracing*'⁶ (the "**2022 Derby Incident**").
37. It is my understanding that Animal Rebellion and AR are one and the same organisation, and that Animal Rebellion simply changed its name to AR in or around in April 2023.⁷

Aintree Racecourse

38. The Applicant also owns Aintree Racecourse, which is located on Ormskirk Rd, Aintree, Liverpool L9 5AS ("**Aintree**"). I was at Aintree on Saturday 15 April 2023, where the Grand National was scheduled to commence at 5:15pm (the "**2023 Grand National**"). Shortly prior to the commencement of the race, however, the following incidents occurred:

⁵ <https://www.theguardian.com/world/2022/jun/04/animal-rebellion-protesters-run-on-to-track-before-epsom-derby> pages 19 to 20 of NT1

⁶ <https://animalrebellion.org/protestors-disrupt-epsom-derby-in-a-call-for-an-end-to-animal-exploitation/> pages 21 to 24 of NT1

⁷ <https://plantbasednews.org/news/activism/animal-rebellion-rebrand-rising/> pages 25 to 28 of NT1

- 38.1 approximately 100 protestors affiliated with AR (the “**AR Protestors**”) began scaling the 10ft fence that surrounds Aintree’s perimeter (“the “**Perimeter Fence**”). The AR Protestors used ladders and various other tools in an attempt to gain access to the racecourse. For the avoidance of doubt, the AR Protestors had no legal right to access the Applicant’s property. The police and members of Aintree’s security team were engaged in an ongoing battle with the AR Protestors for a substantial period of time. Despite this, several of the AR Protestors were successful in gaining access to the racecourse and managed to get onto the racetrack (the “**First Unauthorised Access**”); and
- 38.2 a further three AR Protestors were able to gain access to the racetrack via the Embankment Enclosure, which contains one of the main spectator stands at Aintree. It is my understanding that these individuals had purchased tickets for the 2023 Grand National. Prior to the commencement of the race, they had accessed the racetrack by running underneath the fencing that skirts its edge. It is my understanding that these individuals were attempting to reach the second fence, over which the horses jump, in order to glue themselves to the fence (the “**Second Unauthorised Access**”). For the avoidance of doubt, the AR Protestors had no legal right to access the racetrack.
39. As a result of the First and Second Unauthorised Accesses (together the “**Aintree Incidents**”), the start of the 2023 Grand National was delayed. The consequences of the AR Protestors’ actions, and further information on what occurred, are set out in Mr. White’s witness statement that supports this application.
40. I am confident that those involved in the Aintree Incidents were affiliated with AR as:
- 40.1 several of the AR Protestors were wearing AR t-shirts; and
- 40.2 AR has widely publicised its involvement in disrupting the 2023 Grand National.⁸
41. In respect of the known Respondent, AR’s account on Instagram posted a video of the known Respondent on 17 April 2023 with the message: *‘Hear from Animal Rising co-founder Dan Kidby about his actions on the track at Aintree...’*⁹ In the video, the known Respondent states: *“I was the person in the grey suit who made his way onto the tracks to try and stop the Grand National from happening.”* This suggests that the known Respondent was involved in the Second Unauthorised Access.

Ayr Racecourse

42. On Saturday 22 April 2023, Ayr Racecourse, which is located on Whitletts Rd, Ayr KA8 0JE (“**Ayr Racecourse**”) and is not owned by the Applicant, hosted the

⁸ <https://www.dailymail.co.uk/news/article-11976413/Grand-National-DELAYED-Animal-Rising-protesters-storm-Aintree-course.html> page 29 to 57 of NT1

⁹ <https://www.instagram.com/p/CrJfJV9Klo7/> page 1 of NT1

annual Scottish Grand National. According to reports in the press, protestors affiliated to AR stormed onto the racetrack, without permission, in an attempt to stop the race from happening¹⁰ (the “**Ayr Incident**”).

43. The same day, AR’s account on Instagram posted a video on their actions at Ayr Racecourse with the message: *‘Supporters of Animal Rising have made it onto the track at the Scottish Grand National. They are trying to attach themselves to jumps and gates to remain in position, in an attempt to cancel the big race. Last week at Aintree was just the beginning. The Summer of Animal Rising is upon us.’*¹¹

44. I do not know whether the known Respondent was involved in the Ayr Incident.

Doncaster Racecourse

45. On Saturday 6 May 2023, Doncaster Racecourse, which is located on Bawtry Rd, Doncaster DN2 6BB (“**Doncaster Racecourse**”) and is not owned by the Applicant, hosted a racing fixture. The final race of the day was scheduled to commence at 7:55pm but it was delayed after three protestors were spotted sitting in the middle of the racetrack (the “**Doncaster Incident**”).¹²

46. Later that day, AR’s posted an article on its website titled: *‘Coronation Royal Race Evening Disrupted At Doncaster: Animal Rising Occupy Track.’*¹³

47. I do not know whether the known Respondent was involved in the Doncaster Incident.

The Incidents

48. The 2022 Derby, Aintree, Ayr and Doncaster Incidents show a clear and consistent pattern of behaviour and intent on AR’s part. Further, there has been nothing to suggest that AR’s campaign against racecourses is over. Rather, AR’s website lists three *‘streams of actions... that will continue throughout the summer.’* The second of those ‘streams’ is: *‘Mass trespass onto animal racing events.’*¹⁴

Communications Between the Applicant, the Known Respondent and AR

49. It is my unequivocal view that the known Respondent and AR are seeking to disrupt – and, ultimately, stop – the 2023 Derby. This is based on multiple factors:

¹⁰ <https://www.dailymail.co.uk/news/article-12002363/Animal-protesters-strike-rush-racecourse-bid-delay-Scottish-Grand-National.htm> page 58 to 65 of NT1

¹¹ <https://www.instagram.com/p/CrV4WMFKFj0/> page 66 to 67 of NT1

¹² <https://www.mirror.co.uk/sport/horse-racing/animal-rights-protest-doncaster-races-29914141> page 68 to 70 of NT1

¹³ <https://www.animalrising.org/post/coronation-royal-race-evening-disrupted-at-doncaster-animal-rising-occupy-track> page 71 to 73 of NT1

¹⁴ <https://www.animalrising.org/how-we-achieve-change> page 74 of NT1

- 49.1 AR have clearly set out their intentions on their own website. The heading on their landing page states: *'Take action for all life: disrupt the Epsom Derby - join us on the tracks.'* In addition, it says: *'Join us on the tracks of the Epsom Derby! We'll be disrupting the Epsom Derby to continue the conversation we started at the Grand National'*¹⁵; and
- 49.2 as is set out in detail in Ms. Starkey's witness statement, during a meeting on 11 May 2023 between AR, including the known Respondent, and the Applicant's representatives, including Ms. Starkey (the "**11 May Meeting**"), the known Respondent set out AR's clear intent that they would disrupt the 2023 Derby in an attempt to stop the race from happening.
50. As detailed in Ms. Starkey's statement, the Applicant made every effort to dissuade the known Respondent and AR from pursuing such action, including:
- 50.1 offering them the opportunity to have a dedicated position on-site to hold a peaceful protest; and
- 50.2 describing the potential dangers of their proposed disruption, not just to the horses, but to the jockeys and the general public.
51. Notwithstanding this, it is my understanding that the known Respondent and AR remain committed to their plans to disrupt the 2023 Derby.

The Impact of the known Respondent and AR's Actions and Threatened Actions on the Derby and Beyond

52. The impact of the known Respondent and AR's actions and threatened actions are significant and span a number of issues and stakeholders as I set out below.

The Horses and the Jockeys

53. The impact of the threatened action on the horses and jockeys is profound. In this regard I refer the Court to the first witness statement of Simon Knapp, the Senior Veterinary Officer for London Region Races, at the Applicant.

The Breeding Industry

54. It is no exaggeration to say that the Derby defines the breed, it is not just about the racing. It is only 3-year-old colts that race in the Derby and the majority of the leading horses are often retired to stud after that season. If the Derby was cancelled the effect not just on those horses, but on the whole breeding and racing industry would be very

¹⁵ <https://www.animalrising.org/> page 76 to 79 of NT1

significant. The racing industry was concerned with this issue when the COVID-19 pandemic hit.

The Protestors

55. As I have set out above in relation to Ms. Davison, the protestors are putting themselves at significant risk. In addition to the risk of entering the Racetrack there is also the risk of violence to the protestors should sections of the crowd become hostile to the protestors' actions.

The Public

56. Approximately 100,000 people attend the Derby Festival. They attend knowing it is safe and entertaining. Should the race be delayed, cancelled, or its safety threatened by protestors, then there are increased risks relating to crowd control and anti-social behaviour.

Additional Event Costs and Organisation

57. I have seen the witness statement of Mr. White that refers to the additional measures that were put in place at Aintree in respect of the 2023 Grand National in response to the threat from AR. They include additional security personnel and dogs, at the cost of approximately £70,000 plus VAT.
58. Additional security measures that the Applicant is putting in place for the 2023 Derby Festival, will cost around £150,000.
59. In addition to the direct, additional costs of putting on the 2023 Derby Festival, significant organisational and management time has already been (and will continue to be) diverted to operational matters in order to minimise the threat posed by AR. This includes additional discussions with: i) safety personnel; ii) security personnel; iii) the police; iv) the Applicant's staff; v) the Applicant's commercial partners; vi) the media; vii) suppliers to the Racecourse; viii) jockeys, trainers and owners; ix) the Local Authority; x) the Conservators; and xi) the Applicant's legal team.
60. The Applicant has been in constant dialogue with Surrey Police surrounding the 2023 Derby Festival. The Police have indicated their support for this injunctive action.

Wider Impact on the Applicant's Business – Management Time

61. It is not just in relation to the 2023 Derby Festival that the Applicant is having to divert management time away from the normal running of the business of the Applicant. It is wider and includes speaking to all of those listed at paragraph 59 above in relation to

all future events, and the future of horse racing generally. This is having a direct effect on the commerciality of the Applicant.

Wider Impact on the Applicant's Business – Commercial

62. The commercial success and longevity of the Applicant, and horse racing more widely, directly depends on the revenue from sponsors, audiences and broadcast partners and all commercial activity.
63. As set out above, the Applicant invests significantly in equine welfare, which is critical to its reputation and therefore commercial longevity. The actions of AR threaten to damage that reputation.
64. If horse racing is no longer seen as safe and entertaining, then people may no longer pay to watch it, either in person or broadcast. This would reduce gate receipts as well as TV broadcast fees.
65. Further, disruption to events has the potential to cause significant reputational harm to the Applicant and also to racing more widely. Approximately 85,000 people are directly and indirectly employed in horse racing in Britain. The industry contributes approximately £4.1 billion to the economy in the United Kingdom.
66. As a result of the Aintree Incidents and the 11 May Meeting, the Applicant engaged Pinsent Masons LLP ("**PM**") and Counsel.
67. PM has obtained witness statements from Mr. White and Ms. Starkey, which records their respective experiences of the Aintree Incidents and the various meetings and discussions that have taken place with the known Respondent and AR, including the 11 May Meeting.

Service of Documents

68. The Applicant also seeks an order against persons unknown. As I have already said, other than Daniel Kidby, the Applicant does not know the identities of the individuals who affiliate themselves with AR, or who intend to carry out the specific acts the Applicant seeks to prevent from happening.
69. On this basis, it is not possible for the Applicant personally to serve the relevant documents on the Second to Eighth Defendants (i.e. the Persons Unknown), and the Applicant has made an application for permission to serve those Defendants by alternative means.

70. The Applicant will, before 4pm on Monday 22 May 2023, carry out the following steps in respect of the Claim Form, Application Notice and the Witness Statements on which it relies for this application ("**the Claim Documents**"):
- 70.1 post the Claim Documents on its website and the website for the Derby Festival;
- 70.2 affix copies of the Claim Documents in transparent containers in at least 2 conspicuous locations at each public entrance to the Epsom Racecourse; and
- 70.3 provide digital copies to AR by email.
71. If an order granting an injunction is made by the Court, the Applicant will carry out the same steps in relation to the Order, to bring it to the attention of the Second to Eighth Defendants as Persons Unknown.
72. The Applicant believes that the Claim Documents and Order, if an injunction were granted, would be likely to come to the attention of the individuals who affiliate themselves with AR and/or who intend to carry out the acts the Applicant seeks to injunct, in view of the following:
- 72.1 As noted above, AR has a strong online presence. The Applicant knows that it has a mailing list by which it contacts individuals who are interested in being involved with its protests. The Applicant also knows that AR publicises its plans widely on social media and across traditional media channels. As such, The Applicant considers it very likely that, once it sends the relevant documents to AR by email, that AR will disseminate it widely, reaching those who intend to be involved in the planned Disruption.
- 72.2 The Applicant also considers that individuals intending to take part in protest action are likely to visit the Applicant's website and/or the Epsom Racecourse as part of their planning of the protest action, in the run up to the race days. As such, the Applicant considers it likely that the relevant documents will come to the attention of the Second to Eighth Defendants in these ways.
- 72.3 Those attending the Epsom Racecourse on the days in question can see the relevant documents affixed to the public entrances. Accordingly, the Applicant considers it likely that the Application and the Order (if granted) will be brought to the attention of the relevant Persons Unknown, before they proceed to commit any of the acts which the Applicant seeks to injunct.
73. In respect of the First Defendant, the Applicant will effect personal service on him in the usual manner, and also intends to notify him of the Application and of any Order granted, by email.

Cross-undertaking

74. Should the Court deem it necessary then I can confirm that the Applicant is willing to give a cross-undertaking in damages in respect of any losses which may be suffered by the Respondents should the Court subsequently find that the proposed Order should not have been made.
75. Exhibited at page 80 to 118 of NT1 is a copy of the Applicant's most recent accounts filed at Companies House.

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 

NEVIN TRUESDALE

Dated: 22/5/23



animal.rising • Follow
Original audio



animal.rising Hear from Animal Rising co-founder Dan Kidby about his actions on the track at Aintree. He extends an invitation to Sandy Thomson - the trainer of horse Hill Sixteen, who tragically died on the first hurdle during the Grand National - for an open and honest conversation about Saturday's events. It's time we reach common ground on our love for other animals, so that we can repair the broken relationship we currently have with animals and the natural world.

Help us to continue to take action to protect animals by donating to support the Summer of Animal Rising.

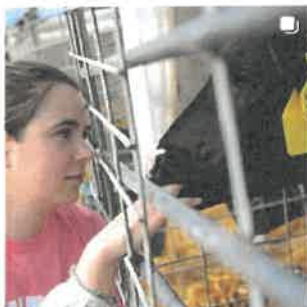
Sign and share our petition to make sure no more horses are killed on the



1,669 likes
APRIL 17

Log in to like or comment.

More posts from animal.rising



See more posts

By Sabrina Miller

MILITANT animal rights activists who tried to halt the Grand National are now planning to sabotage the Epsom Derby, The Mail on Sunday can reveal.

Campaigners from Animal Rising boasted that they are planning to use glue and 'lock-on devices' to secure themselves to the perimeter fencing at the famous racecourse on June 3.

The organisers said they have already conducted secret reconnaissance missions of the track to pinpoint security weaknesses. They boasted that Epsom is 'almost unpoliceable' because some sections of the course are freely open and accessible to members of the general public.

Like at Aintree, some campaigners will attend a legal demonstration outside the venue, while a smaller group will try to break on to the track in an attempt to 'delay or cancel' the race.

Animal Rising spokesman Nathan McGovern said: 'We are just over two weeks away from the Epsom Derby and we have already made it very public that we intend to cause disruption. Epsom racetrack is very vast - I think it is the biggest perimeter that they

'Their actions could threaten the lives of the horses'

have - and there is a non-ticketed public access area, too.

'Police and The Jockey Club are very worried about their ability to secure the course and prevent disruption from happening. You could say they have almost admitted that the racetrack is unpoliceable.'

The group is encouraging people to sign up for non-violent direct action training days around the country ahead of the spectacle, one of the biggest race days of the year, which will be watched by thousands.

Six female Animal Rising protesters, donning sashes with the words 'Animal Justice', were arrested after they clambered on to the Epsom Derby racetrack last year.

But Animal Rising predicts that 'up to 1,000' protesters will attend the race this year and said: 'We'll be disrupting the Epsom Derby to continue the conversation we started at the Grand National.'

The vegan group advertised the protest as a 'day of family fun, free from animal exploitation' and are organising activities including an eggless spoon race.

This latest stunt comes after Animal Rising's plot to wreck the Grand National was sensationally foiled by an undercover reporter at The Mail on Sunday.

Police arrested 118 protesters after dozens of activists tried to storm the security fences and stop the world-famous event from taking place.

Remarkably, the race was delayed by just 14 minutes after security guards, who had been forewarned by this newspaper, acted swiftly to



HAILED AWAY: Police drag protesters from the racecourse at last year's Epsom Derby, after they clambered on to the track. Six women were arrested

After failed bid to ruin Grand National... Animal rights mob boasts: We have got hundreds ready to sabotage the Derby



FANS: Mike and Zara Tindal at Epsom last year. Right: Our story last month

remove protesters from the track. Animal Rising has warned it plans to disrupt horse races throughout the summer, which could include targeting the first Royal Ascot of King Charles's reign.

Tim Bonner, chief executive of the Countryside Alliance, said: 'Animal Rising are desperate attention-seekers whose actions could threaten the welfare of horses.'

'Now that Surrey Police are aware



of their dangerous plans, it is vital they police this event robustly.'

A police spokesman said: 'The Epsom Derby is one of the largest events we police in Surrey and thorough planning takes place to ensure we keep the public safe.'

'The guiding principles of policing protests are the safety of protesters, the public and police officers involved, preventing crim-

inal behaviour or disorder and escalating tensions. We will seek to facilitate peaceful protests but any criminal activity or risk to public safety will not be tolerated.'

Nevin Triesdale, chief executive of The Jockey Club, which runs Epsom Downs Racecourse, said: 'We have been working with Surrey Police to ensure we have robust security measures in place.'

'While we respect anyone's right to peaceful and lawful protest, we would condemn illegal and reckless plans to breach security in an effort to disrupt action on the track and endanger the safety of the participants in the strongest possible terms.'

Animal Rising, founded in 2019, is an offshoot of the militant eco-group Extinction Rebellion. Earlier this month, five activists from the group also disrupted races at Doncaster by climbing over the fences.

Builders' radio demolishes the competition!

A BUILDERS' radio station launched by a graduate has become the fastest-growing radio station in the UK.

Fix Radio, which entertains tradespeople, grew by nearly 250 per cent since its national launch in May last year, reaching just under 300,000 listeners.

The station's popular segments include The Bald Builders Breakfast, The Plastering Show and What's In Your Skip?, where callers

By Natasha Livingstone

ring in about the strangest items dumped onsite. Its success bucks a wider trend, with audiences for BBC network radio shrinking by four per cent in the same period.

Last week, industry figures revealed that Radio 4 has suffered its lowest listening figures in 16 years, while Radio 2 has shed 121,000 weekly listeners. Fix Radio

was built by Leeds University graduate Louis Timpany, 30.

When he was doing some construction work he noticed that his fellow workers listened to the radio from dawn to dusk but were infuriated by repetitive music. Within six months, the idea for Fix Radio was born - and in 2016 the station launched in London by delivering 30,000 bacon butties to builders.

'We visited several thousand construction sites, giving out bacon

sandwiches and swapping their radios,' said Mr Timpany.

The station kept growing and last year crowdfunded £1 million to launch nationally.

A year on, Fix Radio's average listener tunes in for 23 hours per week. Audiences for BBC radio listen for just 13.9 hours and commercial radio 9.8 hours per week. The station is also a commercial success.

Broadcasting from Vauxhall in

South London, Fix Radio focuses on providing upbeat, varied music that builders can sing along to.

Its most popular songs include Sex On Fire by Kings Of Leon, Modjo's Lady (Hear Me Tonight) and Coldplay's Viva La Vida.

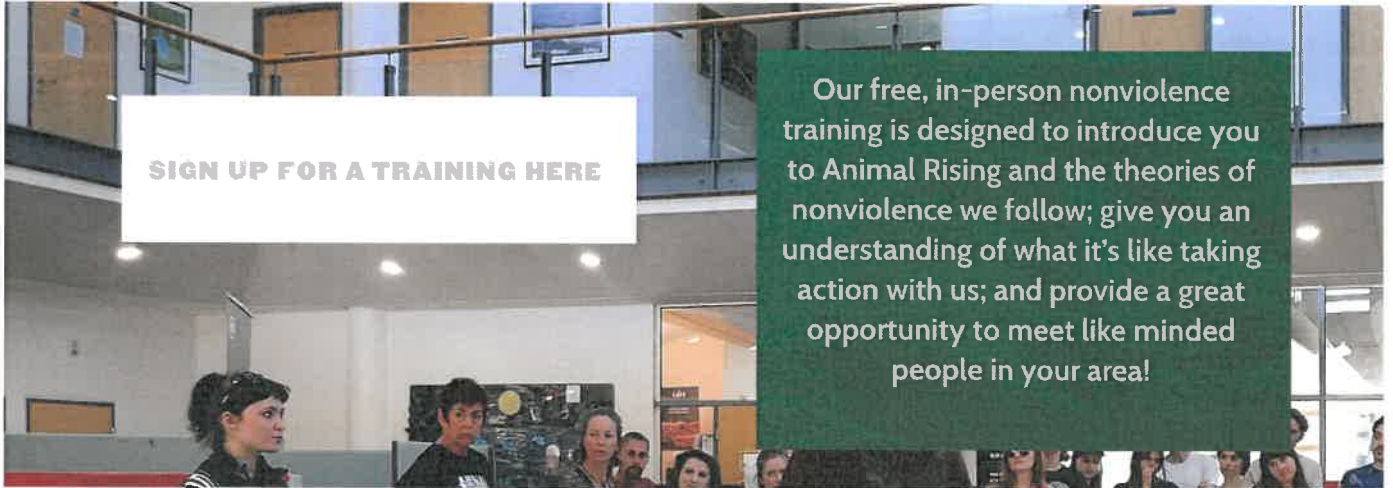
The station covers topics from tool theft to mental health, with its shows fronted by tradesmen turned radio presenters who were hand-picked and trained by the radio station.

TAKE ACTION FOR ALL LIFE: DISRUPT THE EPSOM DERBY JOIN US ON THE TRACKS



2. COME TO A TRAINING

NT 1/3



SIGN UP FOR A TRAINING HERE

Our free, in-person nonviolence training is designed to introduce you to Animal Rising and the theories of nonviolence we follow; give you an understanding of what it's like taking action with us; and provide a great opportunity to meet like minded people in your area!

3. TAKE ACTION



Animal Rising is nationwide and regionally organised. Sign up now to be put in contact with a local organiser and join the community!

Take Action with Animal Rising

SIGN UP NOW

ADD YOUR NAME

First Name *

Last Name *

Opt in to email updates from Animal Ri:

PREFERRED PRONOUNS *

IF YOU SELECTED OTHER, SPECIFY HERE

Mobile Number *, 07400 12345

Email *

REGION *



Not from the UK?

Let us know on the sign-up form and we will reach out to you. Animal Rising won't have international chapters but we will get in touch to discuss other ways we can collaborate.

[Get in touch](#)

SUPPORT US BY DONATING

In Animal Rising, we all give monthly to create a movement owned by us all.

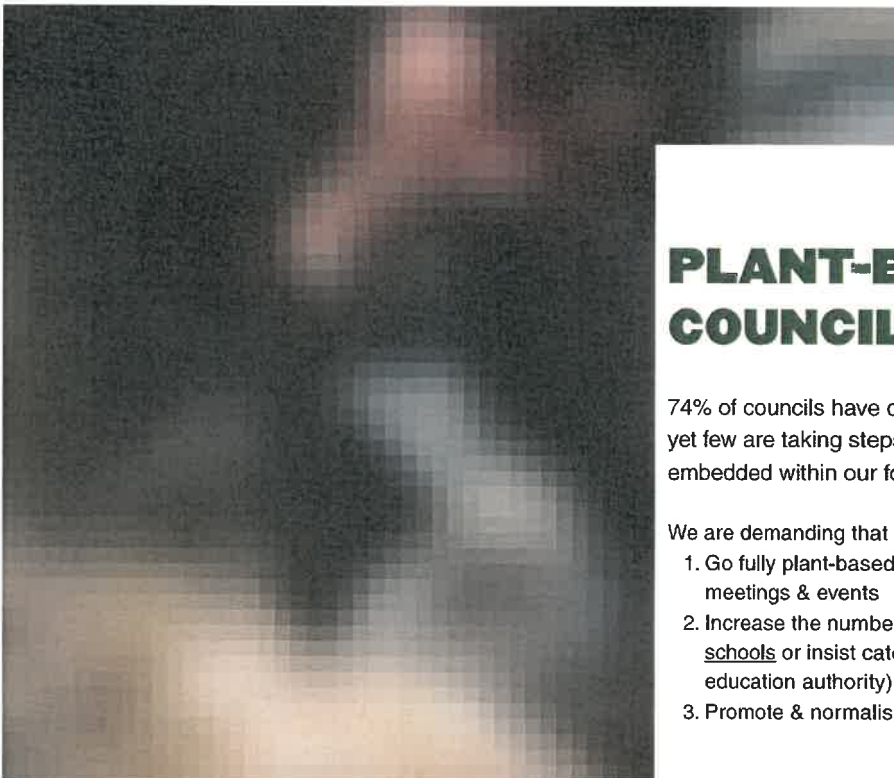
We're asking people to donate **1 hour's wage once a month** to support our work for animals.

This allows us to rescue more animals, take high profile actions, and create a national conversation about our relationship with the natural world.

Thank you so much.

We couldn't do this without people like you supporting us with regular donations. Your money goes a long way - it is spent on supporting our activists, getting the materials we need to make an action a success, and ensuring the welfare of all rescued animals both in our care and beyond.

OUR OTHER CAMPAIGNS



PLANT-BASED COUNCILS

74% of councils have declared a climate emergency, yet few are taking steps to reduce emissions embedded within our food system.

We are demanding that councils:

1. Go fully plant-based in any future catering for meetings & events
2. Increase the number of plant-based meal options in schools or insist catering suppliers do so (if an education authority)
3. Promote & normalise plant-based eating to residents

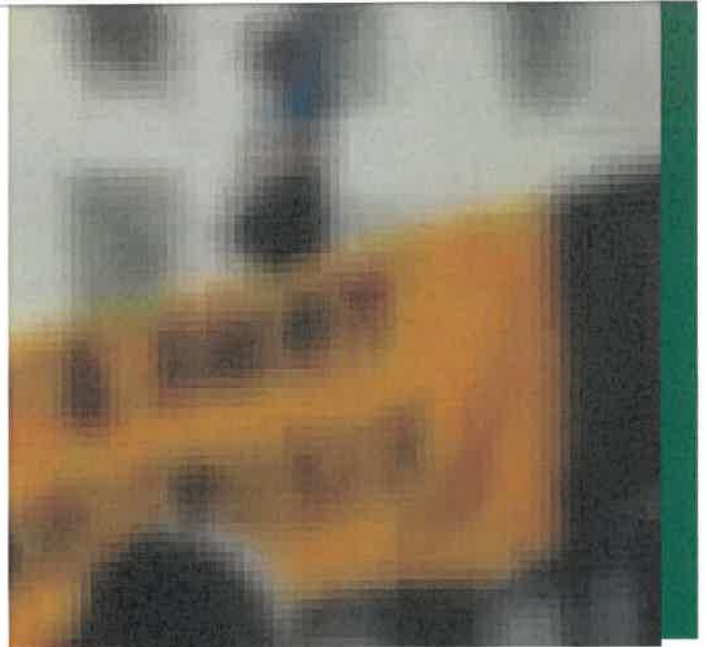
[READ MORE](#)

PLANT-BASED UNIVERSITIES

A student-led campaign for all university catering facilities to end the sale of animal products and make 100% of their menus plant-based.

Universities must reduce their contribution to the climate and ecological emergency and shift public opinion in favour of a plant-based food system. This campaign is supported by Animal Rising.

[READ MORE](#)



2023

- 21 May 10:00 - 17:00 Nonviolence training day (Lincoln)
- 24 May 19:00 - 20:15 **Summer of Animal Rising - introduction zoom call** 📅
- 19:00 - 20:00 Midlands Meeting (weekly zoom) 📅
- 7 May 10:00 - 17:00 **Nonviolence training day (London)**
- 10:00 - 17:00 Nonviolence Training (Leicester)
- 10:00 - 17:00 **Nonviolence training day (Brighton)**
- 29 May 10:00 - 17:00 **Nonviolence training day (London)**
- 10:00 - 17:00 Nonviolence Training (Birmingham)
- 10:00 - 17:00 **Nonviolence training day (Durham)**
- 12:00 - 15:00 **October Books Social** 📅
- 19:00 - 20:00 Midlands Meeting (weekly zoom) 📅
- 30 May 18:30 - 19:30 **Northern Hub Meeting (Fortnightly Zoom)** 📅
- 31 May 19:00 - 20:15 **Summer of Animal Rising - introduction zoom call** 📅

2023

- 1 Jun **Contact us - info@animalrising.org**
- 7 Jun **Join our mailing list**
- Privacy policy**



Join us on the tracks of the Epsom Derby!

We'll be disrupting the Epsom Derby to continue the conversation we started at the Grand National.

Be one of those to make history and achieve meaningful change for all life, join us on the tracks.

After signing up you'll be contacted by a volunteer and we'll get you ready for action.

[Sign in to Google](#) to save your progress. [Learn more](#)

* Indicates required question

Name *

Your answer

Pronouns

Choose 

Phone *

Your answer



Email *

Your answer

Region *

Choose

Country

Your answer

I have attended a nonviolence training *

Yes

Not yet

[Next](#)

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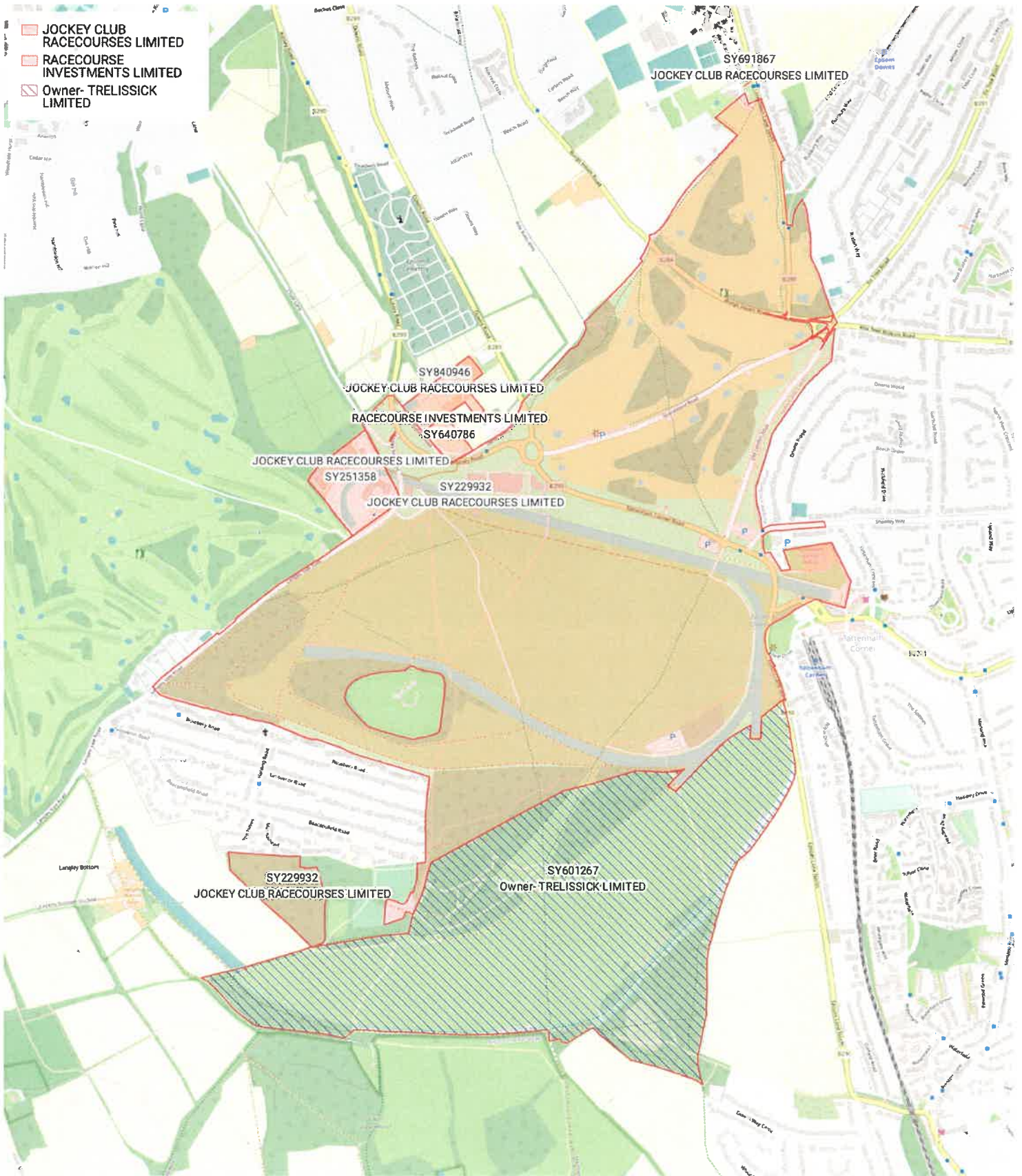
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Google Forms







Epsom Racecourse

- a** Stables
- b** Parade Ring
- c** Horse & Jockey Entrance to Race Track
- d** Derby Start
- e** Race Finish

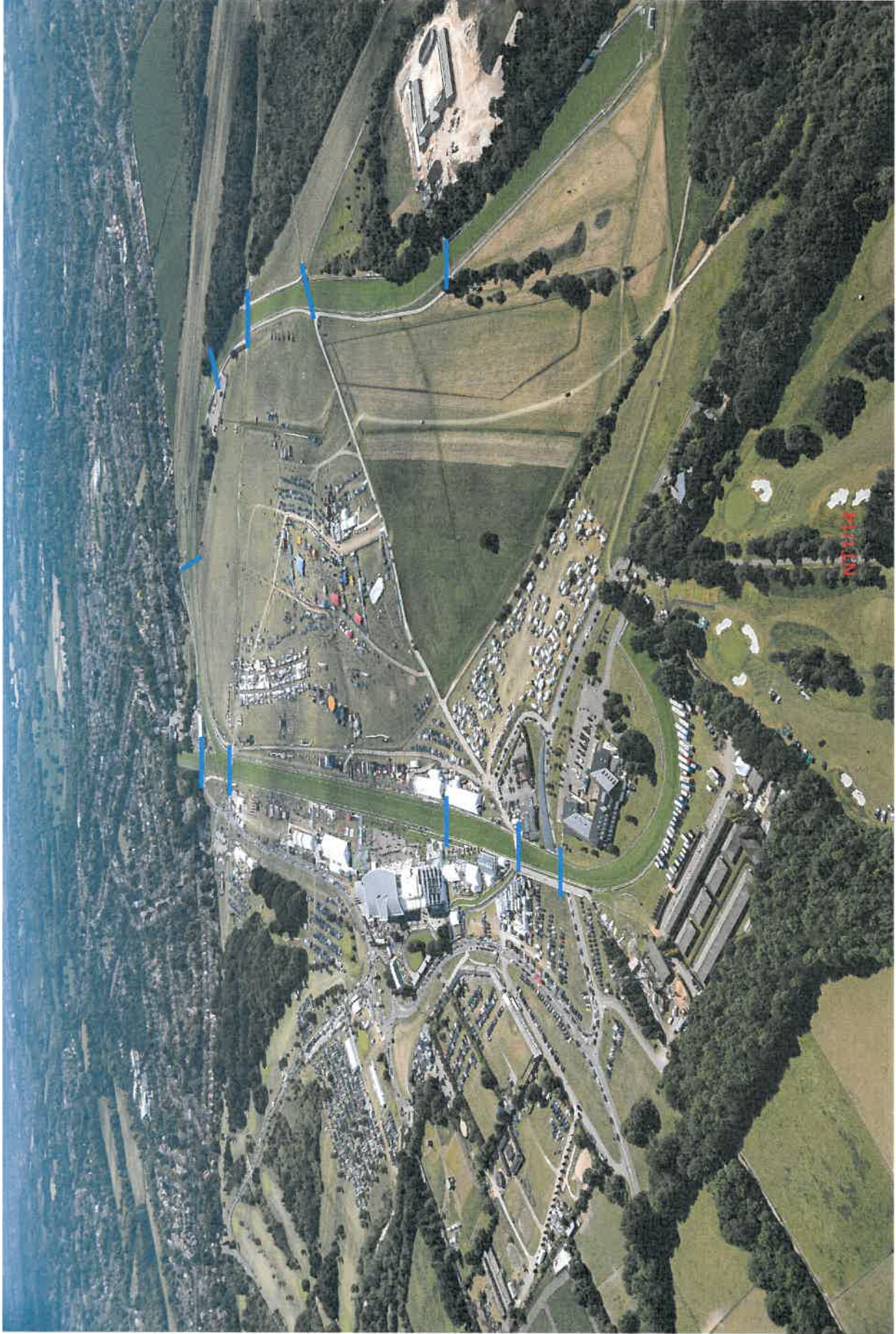
Horses will leave the stables (a) and make their way to the Parade Ring (b).

Jockeys will mount their horses in the Parade Ring (b) and walk their horse to the Race Track (c).

Jockeys will canter their horse to the Derby Start (d) where they will enter the starting stalls and the race will commence.



Crossing Points
on the Race
Track



Access to
Parade Ring
from Stables

a Stables

b Parade Ring



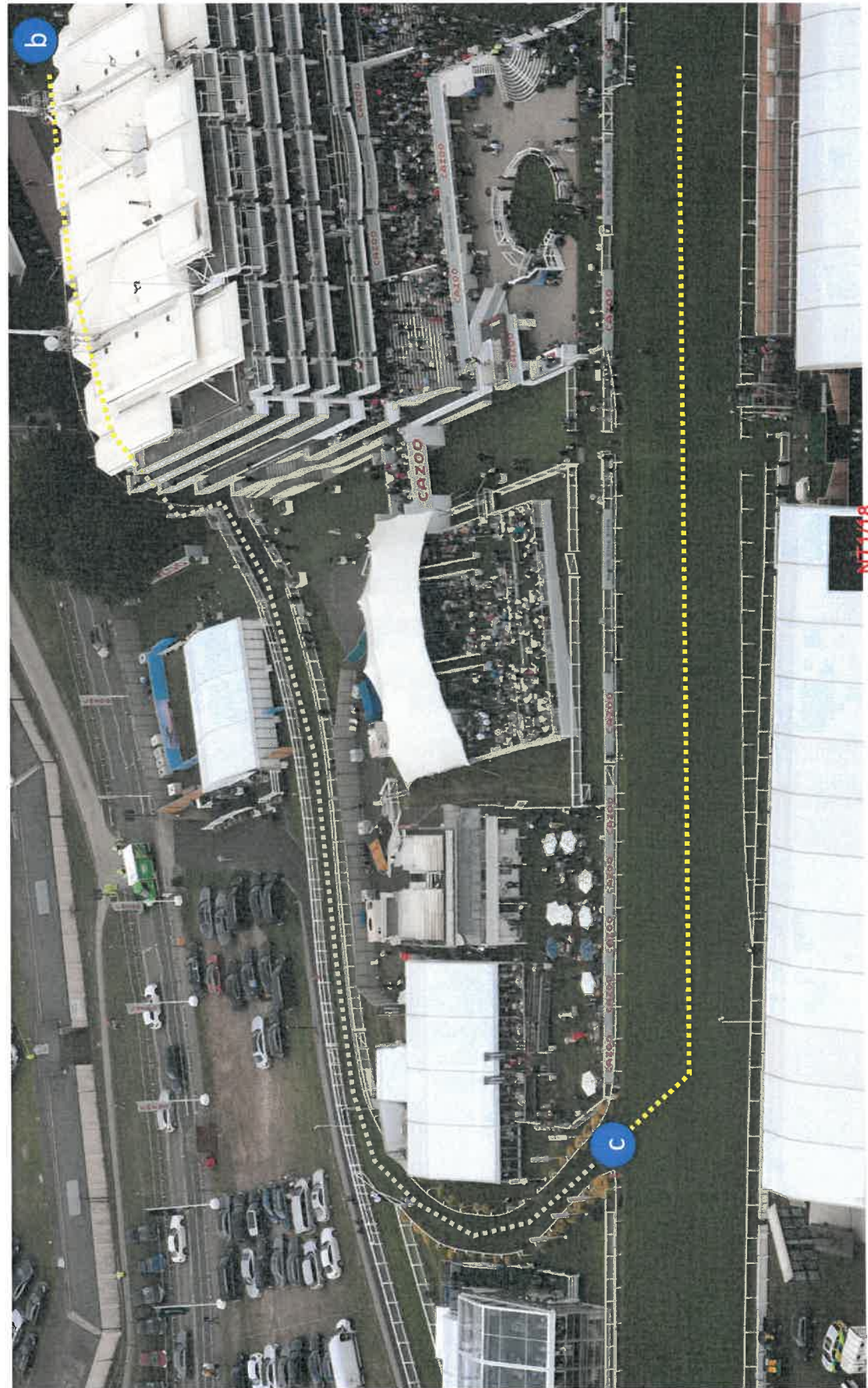
When the horses parade out, rope is held up by stewards to close off the areas of the Horses' Routes to the Parade Ring and to the Race Start which are not fenced off, so as to separate horses from spectators.



Access from
Parade Ring to
Race Track

- b** Parade Ring
- c** Horse & Jockey
Entrance to
Race Track





Access from
Parade Ring to
Race Track

b

Parade Ring

c

Horse & Jockey
Entrance to
Race Track



Animal welfare

● This article is more than 11 months old

Animal Rebellion protesters run on to track before Epsom Derby

Dozens of police officers remove six female campaigners wearing sashes reading 'Animal Justice'

PA Media

Sat 4 Jun 2022 18.37 BST

Six female protesters from the Animal Rebellion campaign group ran on to the track before [the Epsom Derby on Saturday](#) afternoon and were removed by police.

Dozens of police officers could be seen working to remove the protesters, who were wearing sashes reading "Animal Justice".

The protest came on the 109th anniversary of the suffragette Emily Wilding Davison throwing herself in front of a horse at the same course.

Some spectators cheered as the protesters were taken away, with a voice on a loudspeaker apologising to spectators.

On Thursday, other members of Animal Rebellion were arrested after they [entered the ceremonial route](#) on the Mall before trooping the colour.

The group said the protest was aimed at making "a definitive statement, and act, against the cruelty and harm the horseracing industry represents".

It describes itself as a "mass movement using nonviolent civil disobedience to call for a just, sustainable plant-based food system".



❏ An animal rebellion activist is arrested after running on to the racecourse on day two of the Epsom Derby. Photograph: Leon Neal/Getty Images

The group is demanding “an end to horse racing, all forms of animal exploitation, and instead a transition towards a plant-based food system and animal justice”.

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Orla Coghlan, one of those at Epsom, said: “Horse racing took the lives of 220 animals on racecourses in the UK last year, and this is just the tip of the iceberg.

“In this country over a billion land animals are killed for food each year. Exploitation of, and violence against, animals is fuelling the climate emergency and suffering across the globe.

“It is obvious we must choose life over death and stop animal exploitation.”

The Queen’s daughter Anne was there at Epsom alongside husband Vice Admiral Sir Tim Laurence and children Peter Phillips and Zara Tindall, who was with husband and former rugby player Mike.



Protestors Disrupt Epsom Derby In A Call For An End To Animal Exploitation

Home > Press > Protestors Disrupt Epsom Derby In A Call For An End To Animal Exploitation



2 Comments Posted in Press By Press & SM Posted on 4th June 2022

Tagged Animal Justice, Animal Rebellion, Animals, Plant-based

- At approximately 4:25 pm 6 women, protestors from the group Animal Rebellion, entered the course at Epsom with sashes reading "Animal Justice".
- They do so on the 109th anniversary of the suffragette Emily Wilding Davison throwing herself in front of a horse at the same course.
- Animal Rebellion is demanding an end to horse racing, all forms of animal exploitation, and instead a transition towards a plant-based food system and animal justice.

Protestors from Animal Rebellion stormed the Epsom Derby to disrupt the race and urge for an end to animal abuse and, instead, a transition to a fair and compassionate plant-based future. This comes just 2 days after the group disrupted the Platinum Jubilee in an effort for Royal land to move to plant-based production and rewilding. [1]

Orla Coghlan, one of those at Epsom today, said "Horse racing took the lives of 220 animals on racecourses in the UK last year, and this is just the tip of the iceberg. In this country over a billion land animals are killed for food each year. Exploitation of, and violence against, animals is fuelling the climate emergency and suffering across the globe. It is obvious we must choose life over death and stop animal exploitation." [2]
[3]

Today's disruption is a definitive statement, and act, against the cruelty and harm the horse-racing industry represents. Riding horses damages their skeleton, spinal nerves and skin. Whilst horses used in races commonly suffer from heart failure, bleeding lungs and gastric ulcers. Most people recognise the cruelty of bullfighting in Spain [4] and, therefore, should also stand against other forms of animal exploitation.

Currently in The UK around 1.9 million dairy cows [5] are in a constant cycle of artificial insemination, pregnancy, birth, their baby calves being taken and killed, and being repeatedly milked beyond their natural capacity due to selective breeding and artificial hormones. All this whilst industries like meat, fish, and dairy directly contribute to climate breakdown and loss of nature [6].

Emma De Saram, spokesperson for Animal Rebellion, said "Whether it's horse racing, dairy, or the meat industry, animal exploitation has no part in our world. By moving beyond this and into a plant-based future we can ensure happiness and justice for all life. Transition into a plant-based future would offset 68% of carbon emissions this century, whilst also putting an end to the horrendous suffering animals face right now." [7]

Moving to a plant-based food system would free valuable land that could, instead, be rewilded. This would bring forests, woodlands, nature, and life back to land across the UK. Rewilding has the potential to absorb

massive amounts of carbon from the Earth's atmosphere and form a key solution to the climate and ecological emergency. [8]

The action today comes as part of Animal Rebellion's demands for a plant-based future, which were announced on Monday 23rd of May. [8] The group is urging for wholesale governmental support for a transition to a plant-based food system and programme of rewilding that will secure a future for generations to come.

Animal Rebellion is a mass movement using nonviolent civil disobedience to call for a just, sustainable plant-based food system.

ENDS

High-quality pictures and videos: <http://show.pics.io/epsom-04-06-22>

Featured image from Press Associated

For interviews or further comment please contact:

Oliver (Press Back Office): 07706 066859

press@animalrebellion.org

[1] <https://animalrebellion.org/animal-rebellion-disrupts-platinum-jubilee-to-demand-a-plant-based-future-and-rewilding-of-royal-land/>

[2] <https://www.animalaid.org.uk/record-numbers-of-race-horses-killed-in-britain-in-2021/>

[3] <https://viva.org.uk/animals/number-animals-killed/>

[4] <https://www.ipsos.com/en-uk/bullfighting-spain>

[5] <https://viva.org.uk/animals/cows/dairy-cows/>

[6] Jia, G, Shevliakova, E et al, "Chapter 2: Land-Climate Interactions" in UN Special Report: Climate Change and Land (2019.) <https://www.ipcc.ch/srccl/>

[7] <https://journals.plos.org/climate/article?id=10.1371%2Fjournal.pclm.0000010>

[8] <https://www.nature.com/articles/s43016-021-00431-5>

[9] <https://www.youtube.com/watch?v=qOq2Jqqga9E&t=5s>

◀ [Animal Rebellion Disrupts Platinum Jubilee To Demand A Plant-Based Future And Rewilding Of Royal Land](#) [Animal Rebellion plans to cause “Large scale material disruption to the supply of dairy”](#) ▶

2 thoughts on “Protestors Disrupt Epsom Derby In A Call For An End To Animal Exploitation”

Pingback: [Animal Rebellion claim they’re going to cause “Large scale material disruption to the supply of dairy”](#) – Animal Rebellion

Pingback: [Animal Rebellion Occupies RSPCA HQ](#) – Animal Rebellion

Comments are closed.