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FAO Neil Todd  
Thompsons Solicitors LLP  
Manchester  
PO Box 11031

**Your reference**

NTO/M24H0802

**Our reference**

EAB/EAB/36257/120046  
UKM/207715356.1

**By Email Only : neiltodd@thompsons.law**

17 September 2025

Dear Sirs

**Birmingham City Council (BCC)  
Unite the Union (Unite)  
High Court Claim no: KB-2025-001839**

We write to you in relation to the Order of Mrs Justice Dias of 29 May 2025 (**Order**) and our contempt application which is to be heard on 13 – 15 October 2025.

We have been made aware by our client of what appears to be further breaches of the Order by Unite having taken place this morning near to the Atlas depot. We enclose a video and photographs of the disruption in question, which mirrored the previous disruption by Unite protestors at the same location between 16 – 30 July 2025.

Whilst we have had sight of social media posts which suggests that the Birmingham Socialist Party were directly responsible for the disruption this morning, it is our client's understanding from an anonymous source who does not wish to be identified that the protestors in attendance this morning were organised by a national officer of Unite, namely an individual known as Lee (whose surname is unknown). This individual has been implicated in a number of the breaches of the Order to date. A photo is enclosed of him present during a previous blockade of waste vehicles at the same location on 30 July 2025. We understand Lee to be part of Unite's Organising Committee. We have previously asked you to confirm this gentleman's full name and role with Unite but you have failed to do so. Please can this now be provided.

We will be including the detail above and the enclosed evidence as part of the additional affidavit for Christopher Smiles being prepared in respect of the Contempt Application. However, we invite you to address this matter urgently with your client. Our client understands from the same anonymous source that similar disruption is planned to take place tomorrow and we ask you to take urgent steps to ensure compliance with the Order.

We also ask that Unite take immediate steps to ensure that all documents, text messages, WhatsApp messages and other communications relevant to the above incident and the ongoing strike action are retained by Unite, its employees, officials and agents. We also ask that urgent instructions are issued by Unite to its members involved in the ongoing strike action to retain all such information which they have in their possession.

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**UK switchboard**  
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Í F

Yours faithfully

*DLA Piper UK LLP*

**DLA Piper UK LLP**

Encl.

**From:** Neil Todd (Thompsons Solicitors) <NeilTodd@thompsons.law>  
**Sent:** 18 September 2025 16:17  
**To:** Euan Bruce  
**Cc:** William Webb (Thompsons Solicitors); Rachel Halliday (Thompsons Solicitors); Amber Davies (Thompsons Solicitors); Jonathan Exten-Wright; Dharma Carlin; Sarah Parkin  
**Subject:** RE: BCC v Unite - Claim No: KB-2025-001839 [DLAP-UKMATTERS.FID6097688]

**\*\*EXTERNAL\*\***

Dear DLA

We write in response to your letter of 17 September alleging further breaches of the Order by Unite.

As stated in your letter, this action appears (from the evidence you have provided to us) to have been organised by the Birmingham Socialist Party. We note (from the social media screenshot you have provided) that the Birmingham Socialist Party refer to taking this action because Unite members are, in the language of Birmingham Socialist Party's social media post, "*unable to picket effectively*". We further note that your allegation is based on an anonymous tip off, and that the individual labelled as Lee (in the photograph you have provided said to be from 30 July 2025) does not from the evidence you have provided to us appear to have been present during any incidents which may have occurred on 17 September.

We have taken instruction from Unite. Unite firmly deny any involvement in the activities which you allege took place near the Atlas Depot on 17 September 2025. Given the seriousness of this allegation (and in order to allow us to conduct any further investigations) please confirm the following:

1. When was this tip-off made?
2. What is the basis of the contention held by the person who gave the tip-off, and in particular its nexus to Unite and any officer or employee of Unite?
3. What is the basis of the contention that there will be another protest on 18 July?

Notwithstanding Unite's position outlined above, it has given further guidance to its representatives today on the terms of the Order and what is required with respect to picketing/protesting. You will recall that Unite most recently issued permanent written guidance on 1 September 2025, and until your letter of 17 September Unite was not aware of any alleged breaches of the Order. As further explained in the affidavit of Anmarie Kilcline, the terms of the Order and the restrictions in place on picketing and protest activities by Unite have been explained repeatedly at the picket line.

Yours faithfully

Thompsons

**Neil Todd**

Partner, Trade Union Law Group  
Thompsons Solicitors  
0161 819 3528



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**From:** Euan Bruce <Euan.Bruce@dlapiper.com>  
**Sent:** 17 September 2025 15:46  
**To:** Neil Todd (Thompsons Solicitors) <NeilTodd@thompsons.law>  
**Cc:** William Webb (Thompsons Solicitors) <WilliamWebb@thompsons.law>; Rachel Halliday (Thompsons Solicitors) <RachelHalliday@thompsons.law>; Amber Davies (Thompsons Solicitors) <AmberDavies@thompsons.law>; Jonathan Exten-Wright <Jonathan.Exten-Wright@dlapiper.com>; Dharma Carlin <Dharma.Carlin@dlapiper.com>; Sarah Parkin <Sarah.Parkin@dlapiper.com>  
**Subject:** RE: BCC v Unite - Claim No: KB-2025-001839 [DLAP-UKMATTERS.FID6097688]

Dear Sirs

Please see our attached correspondence and accompanying enclosures.

The video referenced in our letter can be accessed using the following link - [17.09.2025 - Atlas - Start of Obstruction.avi](#), which should be available to everyone in copy on this email.

Yours faithfully  
DLA Piper UK LLP

**Euan Bruce**  
Legal Director

T: +441312425010  
M: +447738295509  
[euan.bruce@dlapiper.com](mailto:euan.bruce@dlapiper.com)

DLA Piper Scotland LLP

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**From:** Euan Bruce  
**Sent:** 16 September 2025 18:49  
**To:** Neil Todd (Thompsons Solicitors) <[NeilTodd@thompsons.law](mailto:NeilTodd@thompsons.law)>  
**Cc:** William Webb (Thompsons Solicitors) <[WilliamWebb@thompsons.law](mailto:WilliamWebb@thompsons.law)>; Rachel Halliday (Thompsons Solicitors) <[RachelHalliday@thompsons.law](mailto:RachelHalliday@thompsons.law)>; Amber Davies (Thompsons Solicitors) <[AmberDavies@thompsons.law](mailto:AmberDavies@thompsons.law)>; Jonathan Exten-Wright <[Jonathan.Exten-Wright@dlapiper.com](mailto:Jonathan.Exten-Wright@dlapiper.com)>; Dharma Carlin <[Dharma.Carlin@dlapiper.com](mailto:Dharma.Carlin@dlapiper.com)>; Sarah Parkin <[Sarah.Parkin@dlapiper.com](mailto:Sarah.Parkin@dlapiper.com)>  
**Subject:** RE: BCC v Unite - Claim No: KB-2025-001839 [DLAP-UKMATTERS.FID6097688]

Dear Sirs

I am not sure why that would be the case. I attach the pdfs again here in case it works this time. However, I confirm that they are simply pdf versions of the following press articles and we do not rely on any videos in respect of these points:

- [Sharon Graham threatens to take any fines for Birmingham strikers from affiliation fees - LabourList](#)
- [Sky News, 7 September 2025](#)

Yours faithfully  
DLA PIPER UK LLP

**Euan Bruce**  
Legal Director

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M: +447738295509  
[euan.bruce@dlapiper.com](mailto:euan.bruce@dlapiper.com)

DLA Piper Scotland LLP

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**From:** Neil Todd (Thompsons Solicitors) <[NeilTodd@thompsons.law](mailto:NeilTodd@thompsons.law)>  
**Sent:** 16 September 2025 18:33  
**To:** Euan Bruce <[Euan.Bruce@dlapiper.com](mailto:Euan.Bruce@dlapiper.com)>  
**Cc:** William Webb (Thompsons Solicitors) <[WilliamWebb@thompsons.law](mailto:WilliamWebb@thompsons.law)>; Rachel Halliday (Thompsons Solicitors) <[RachelHalliday@thompsons.law](mailto:RachelHalliday@thompsons.law)>; Amber Davies (Thompsons Solicitors) <[AmberDavies@thompsons.law](mailto:AmberDavies@thompsons.law)>; Jonathan Exten-Wright <[Jonathan.Exten-Wright@dlapiper.com](mailto:Jonathan.Exten-Wright@dlapiper.com)>; Dharma Carlin <[Dharma.Carlin@dlapiper.com](mailto:Dharma.Carlin@dlapiper.com)>; Sarah Parkin <[Sarah.Parkin@dlapiper.com](mailto:Sarah.Parkin@dlapiper.com)>  
**Subject:** RE: BCC v Unite - Claim No: KB-2025-001839 [DLAP-UKMATTERS.FID6097688]

**\*\*EXTERNAL\*\***

Thank you for providing the same.

One of the attachments is blocked and we cannot access. I presume it is a video of an interview for Sky News. I would be grateful if you could confirm and look to see if there is any other way of providing it.

Yours sincerely

Thompsons

**Neil Todd**

Partner, Trade Union Law Group  
Thompsons Solicitors  
0161 819 3528



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**From:** Euan Bruce <[Euan.Bruce@dlapiper.com](mailto:Euan.Bruce@dlapiper.com)>

**Sent:** 16 September 2025 18:28

**To:** Neil Todd (Thompsons Solicitors) <[NeilTodd@thompsons.law](mailto:NeilTodd@thompsons.law)>

**Cc:** William Webb (Thompsons Solicitors) <[WilliamWebb@thompsons.law](mailto:WilliamWebb@thompsons.law)>; Rachel Halliday (Thompsons Solicitors) <[RachelHalliday@thompsons.law](mailto:RachelHalliday@thompsons.law)>; Amber Davies (Thompsons Solicitors) <[AmberDavies@thompsons.law](mailto:AmberDavies@thompsons.law)>; Jonathan Exten-Wright <[Jonathan.Exten-Wright@dlapiper.com](mailto:Jonathan.Exten-Wright@dlapiper.com)>; Dharma Carlin <[Dharma.Carlin@dlapiper.com](mailto:Dharma.Carlin@dlapiper.com)>; Sarah Parkin <[Sarah.Parkin@dlapiper.com](mailto:Sarah.Parkin@dlapiper.com)>

**Subject:** RE: BCC v Unite - Claim No: KB-2025-001839 [DLAP-UKMATTERS.FID6097688]

Dear Sirs

Apologies, these were omitted in error. Please find them attached here.

Yours faithfully  
DLA Piper UK LLP

**Euan Bruce**

Legal Director

---

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M: +447738295509  
[euan.bruce@dlapiper.com](mailto:euan.bruce@dlapiper.com)

DLA Piper Scotland LLP

---

**From:** Neil Todd (Thompsons Solicitors) <[NeilTodd@thompsons.law](mailto:NeilTodd@thompsons.law)>

**Sent:** 16 September 2025 18:20

**To:** Euan Bruce <[Euan.Bruce@dlapiper.com](mailto:Euan.Bruce@dlapiper.com)>

**Cc:** William Webb (Thompsons Solicitors) <[WilliamWebb@thompsons.law](mailto:WilliamWebb@thompsons.law)>; Rachel Halliday (Thompsons Solicitors) <[RachelHalliday@thompsons.law](mailto:RachelHalliday@thompsons.law)>; Amber Davies (Thompsons Solicitors) <[AmberDavies@thompsons.law](mailto:AmberDavies@thompsons.law)>; Jonathan Exten-Wright <[Jonathan.Exten-Wright@dlapiper.com](mailto:Jonathan.Exten-Wright@dlapiper.com)>; Dharma Carlin <[Dharma.Carlin@dlapiper.com](mailto:Dharma.Carlin@dlapiper.com)>; Sarah Parkin <[Sarah.Parkin@dlapiper.com](mailto:Sarah.Parkin@dlapiper.com)>

**Subject:** RE: BCC v Unite - Claim No: KB-2025-001839 [DLAP-UKMATTERS.FID6097688]

**\*\*EXTERNAL\*\***

Dear DLA,

You refer to the following:

*"I attach copies of the two articles included in the miscellaneous section for your information"*. However we are unable to locate any such articles. Please can you clarify the position.

Yours faithfully

Thompsons

**Neil Todd**

Partner, Trade Union Law Group  
Thompsons Solicitors  
0161 819 3528



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**From:** Euan Bruce <[Euan.Bruce@dlapiper.com](mailto:Euan.Bruce@dlapiper.com)>

**Sent:** 16 September 2025 18:15

**To:** Neil Todd (Thompsons Solicitors) <[NeilTodd@thompsons.law](mailto:NeilTodd@thompsons.law)>

**Cc:** William Webb (Thompsons Solicitors) <[WilliamWebb@thompsons.law](mailto:WilliamWebb@thompsons.law)>; Rachel Halliday (Thompsons Solicitors) <[RachelHalliday@thompsons.law](mailto:RachelHalliday@thompsons.law)>; Amber Davies (Thompsons Solicitors) <[AmberDavies@thompsons.law](mailto:AmberDavies@thompsons.law)>; Jonathan Exten-Wright <[Jonathan.Exten-Wright@dlapiper.com](mailto:Jonathan.Exten-Wright@dlapiper.com)>; Dharma Carlin <[Dharma.Carlin@dlapiper.com](mailto:Dharma.Carlin@dlapiper.com)>; Sarah Parkin <[Sarah.Parkin@dlapiper.com](mailto:Sarah.Parkin@dlapiper.com)>

**Subject:** RE: BCC v Unite - Claim No: KB-2025-001839 [DLAP-UKMATTERS.FID6097688]

Dear Sirs

We write to you in relation to paragraph 4 of the consent order which requires the Claimant to agree and file a copy of an agreed bundle by 20 September 2025.

We are in the process of preparing the proposed bundle and attach a draft index of the items we would propose to include for your comment. As you will see, there is a placeholder for the rebuttal evidence that will be provided tomorrow. I attach copies of the two articles included in the miscellaneous section for your information. The remaining items should, we hope, be apparent. We will provide a complete bundle for your review as soon as we can but please provide us with any comments you have in the meantime.

The nature of the evidence in this case means that there will be a number of videos which form part of the evidence for both the substantive injunction application and the contempt application. A folder of these will be provided with cross referencing to the page of the proposed bundle.

Your faithfully  
DLA PIPER UK LLP

**Euan Bruce**

Legal Director

---

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M: +447738295509  
[euan.bruce@dlapiper.com](mailto:euan.bruce@dlapiper.com)

DLA Piper Scotland LLP

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**From:** Neil Todd (Thompsons Solicitors) <[NeilTodd@thompsons.law](mailto:NeilTodd@thompsons.law)>

**Sent:** 10 September 2025 14:27

**To:** Euan Bruce <[Euan.Bruce@dlapiper.com](mailto:Euan.Bruce@dlapiper.com)>; Jonathan Exten-Wright <[Jonathan.Exten-Wright@dlapiper.com](mailto:Jonathan.Exten-Wright@dlapiper.com)>; Dharma Carlin <[Dharma.Carlin@dlapiper.com](mailto:Dharma.Carlin@dlapiper.com)>; Sarah Parkin <[Sarah.Parkin@dlapiper.com](mailto:Sarah.Parkin@dlapiper.com)>

**Cc:** William Webb (Thompsons Solicitors) <[WilliamWebb@thompsons.law](mailto:WilliamWebb@thompsons.law)>; Rachel Halliday (Thompsons Solicitors) <[RachelHalliday@thompsons.law](mailto:RachelHalliday@thompsons.law)>; Amber Davies (Thompsons Solicitors) <[AmberDavies@thompsons.law](mailto:AmberDavies@thompsons.law)>

**Subject:** BCC v Unite - Claim No: KB-2025-001839

**\*\*EXTERNAL\*\***

Dear DLA,

We write in relation to paragraph 2 of the Consent Order dated 19 August 2025 which requires us to serve our evidence in respect of your client's contempt application.

On that basis we attach the following:

1. Affidavit of Annmarie Kilcline with relevant exhibit.
2. Affidavit of Luke Dalton with relevant exhibit.

Yours faithfully

Thompsons

**Neil Todd**

Partner, Trade Union Law Group

 Manchester Office  
Our Offices page



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**Refer to CS/14 in the OneDrive Folder**

**Refer to CS/15 in the OneDrive Folder**

**Refer to CS/16 in the OneDrive Folder**

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