

On behalf of: the Claimant
By: Sean Foster Martell
No: 3
Exhibit: SFM3

Date: 25 July 2024

QB-2021-003576

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

BETWEEN:

NATIONAL HIGHWAYS LIMITED

Claimant

- and -

PERSONS UNKNOWN CAUSING THE BLOCKING OF, ENDANGERING, OR
PREVENTING THE FREE FLOW OF TRAFFIC ON THE M25 MOTORWAY,
A2 A20 AND A2070 TRUNK ROADS AND M2 AND M20 MOTORWAY, A1(M),
A3, A1081, A12, A120, A13, A21, A23, A30, A414 AND A3113 TRUNK ROADS
AND THE M1, M3, M4, M4 SPUR, M11, M26, M23 AND M40 MOTORWAYS
FOR THE PURPOSE OF PROTESTING

Defendants

EXHIBIT SFM3

This is the exhibit marked SFM3 referred to in the witness statement of SEAN FOSTER
MARTELL dated this 25 day of July 2024.

Signed



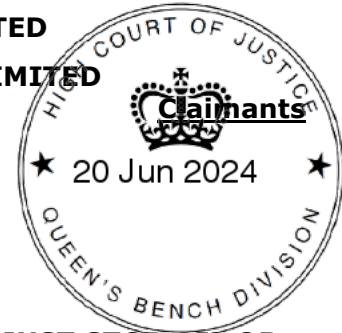
IN THE HIGH COURT OF JUSTICE
KING BENCH DIVISION

CLAIM NO: KB-2024-001765

Before Mr Justice Julian Knowles
On 20 June 2024

BETWEEN:-

- (1) **LONDON CITY AIRPORT LIMITED**
(2) **DOCKLANDS AVIATION GROUP LIMITED**



- v -

PERSONS UNKNOWN WHO, IN CONNECTION WITH THE JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN, ENTER OCCUPY OR REMAIN (WITHOUT THE CLAIMANTS' CONSENT) UPON THAT AREA OF LAND KNOWN AS LONDON CITY AIRPORT (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED PLAN 1) BUT EXCLUDING THOSE AREAS OF LAND AS FURTHER DEFINED IN THE CLAIM FORM

Defendant

ORDER

PENAL NOTICE

IF YOU THE WITHIN DEFENDANTS OR PERSONS UNKNOWN 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 OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR PERSONS UNKNOWN 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 AND PERSONS UNKNOWN

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 Claimants' claim by Claim Form, dated 12 June 2024

AND UPON hearing the Claimants' application for an interim injunction, dated 12 June 2024, and supporting evidence, without Persons Unknown being notified

AND UPON hearing Counsel for the Claimants

AND UPON the Claimants giving and the Court accepting the undertakings set out in Schedule 2 to this Order

AND UPON the "Land" being defined as that land known as London City Airport, as shown for identification edged red on the attached Plan 1 in Schedule 1, but excluding:

- a. Those buildings shaded blue on Plan 1;
- b. In those buildings shaded green on Plan 1, the areas edged blue on Plans 2-8;
- c. In those areas shaded purple, the land suspended over the ground and forming part of the Docklands Light Railway.
- d. In the areas shaded pink, the underground rail tunnel, the subway and that part of Docklands Light Railway located below ground level.

IT IS ORDERED THAT:

INJUNCTION

1. Until 20 June 2029 or final determination of the claim or further order in the meantime, whichever shall be the earlier, Persons Unknown must not, without the consent of the Claimants, enter, occupy or remain upon the Land.
2. In respect of paragraph 1, Persons Unknown must not: (a) do it himself/herself/themselves or in any other way; (b) do it by means of another person acting on his/her/their behalf, or acting on his/her/their instructions.
3. The injunction contained at paragraph 1 of this Order shall be reviewed on each anniversary of this Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 1.5 hours. The Claimants are permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the review hearing.

VARIATION

4. Anyone served with or notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimants' solicitors 72 hours' notice of such application. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Claimants' solicitors at least 48 hours in advance of any hearing.
5. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
6. The Claimants have liberty to apply to vary this Order.

SERVICE AND NOTIFICATION

7. Service of the claim form, the application for interim injunction and this Order is dispensed with, pursuant to CPR 6.16, 6.28 and 81.4(2)(c).
8. Pursuant to the guidance in *Wolverhampton CC v London Gypsies & Travellers* [2024] 2 WLR 45, the Claim Form, Application Notice, evidence in support and Note of the Hearing on 20 June 2024 will be notified to Persons Unknown by the Claimants carrying out each of the following steps:
 - a. Uploading a copy onto the following website:
<https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction>
 - b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above.
 - c. Either affixing a notice at those locations marked with an "X" on Plan 1 setting out where these documents can be found and obtained in hard copy or including this information in the warning notices referred to at paragraph 9(d) below.
9. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, this Order shall be notified to Persons Unknown by the Claimants carrying out each of the following steps:

- a. Uploading a copy of the Order onto the following website:
<https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction>
 - b. Sending an email to the email addresses listed in Schedule 3 to this Order attaching a copy of this Order.
 - c. Affixing a copy of the Order in A4 size in a clear plastic envelope at those locations marked with an "X" on Plan 1.
 - d. Affixing warning notices of A2 size at those locations marked with an "X" on Plan 1.
10. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification to Persons Unknown of any further applications shall be effected by the Claimants carrying out each of the following steps:
 - a. Uploading a copy of the application onto the following website:
<https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction>.
 - b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that an application has been made and that the application documents can be found at the website referred to above.
 - c. Affixing a notice at those locations marked with an "X" on Plan 1 stating that the application has been made and where it can be accessed in hard copy and online.
11. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification of any further documents to Persons Unknown may be effected by carrying out the steps set out in paragraph 10(a)-(b) only.
12. In respect of paragraphs 8 to 11 above, effective notification will be deemed to have taken place on the date on which all of the relevant steps have been carried out.
13. For the avoidance of doubt, in respect of the steps referred to at paragraphs 8(c), 9(c)-(d) and 10(c), effective notification will be deemed to have taken place when those documents are first affixed regardless of whether they are subsequently removed.

FURTHER DIRECTIONS

14. Liberty to apply.
15. Costs are reserved.

COMMUNICATIONS WITH THE CLAIMANT

16. The Claimants' solicitors and their contact details are:

(1) Stuart Wortley
Eversheds Sutherland (International) LLP
StuartWortley@eversheds-sutherland.com
07712 881 393

(2) Nawaaz Allybokus
Eversheds Sutherland (International) LLP
NawaazAllybokus@eversheds-sutherland.com
07920 590 944

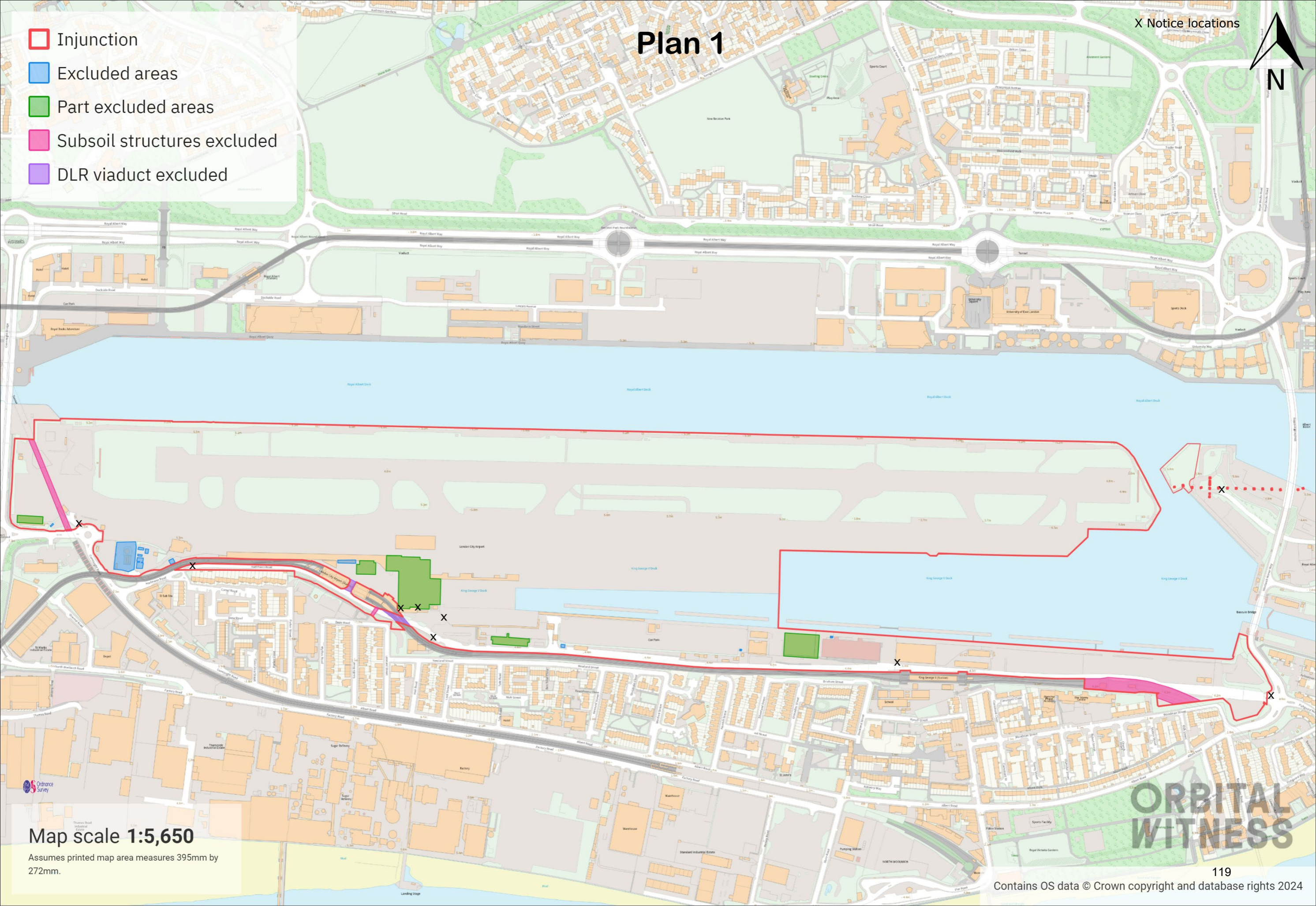
Dated: 20 June 2024

SCHEDULE 1 - PLANS

- Injunction
- Excluded areas
- Part excluded areas
- Subsoil structures excluded
- DLR viaduct excluded

Plan 1

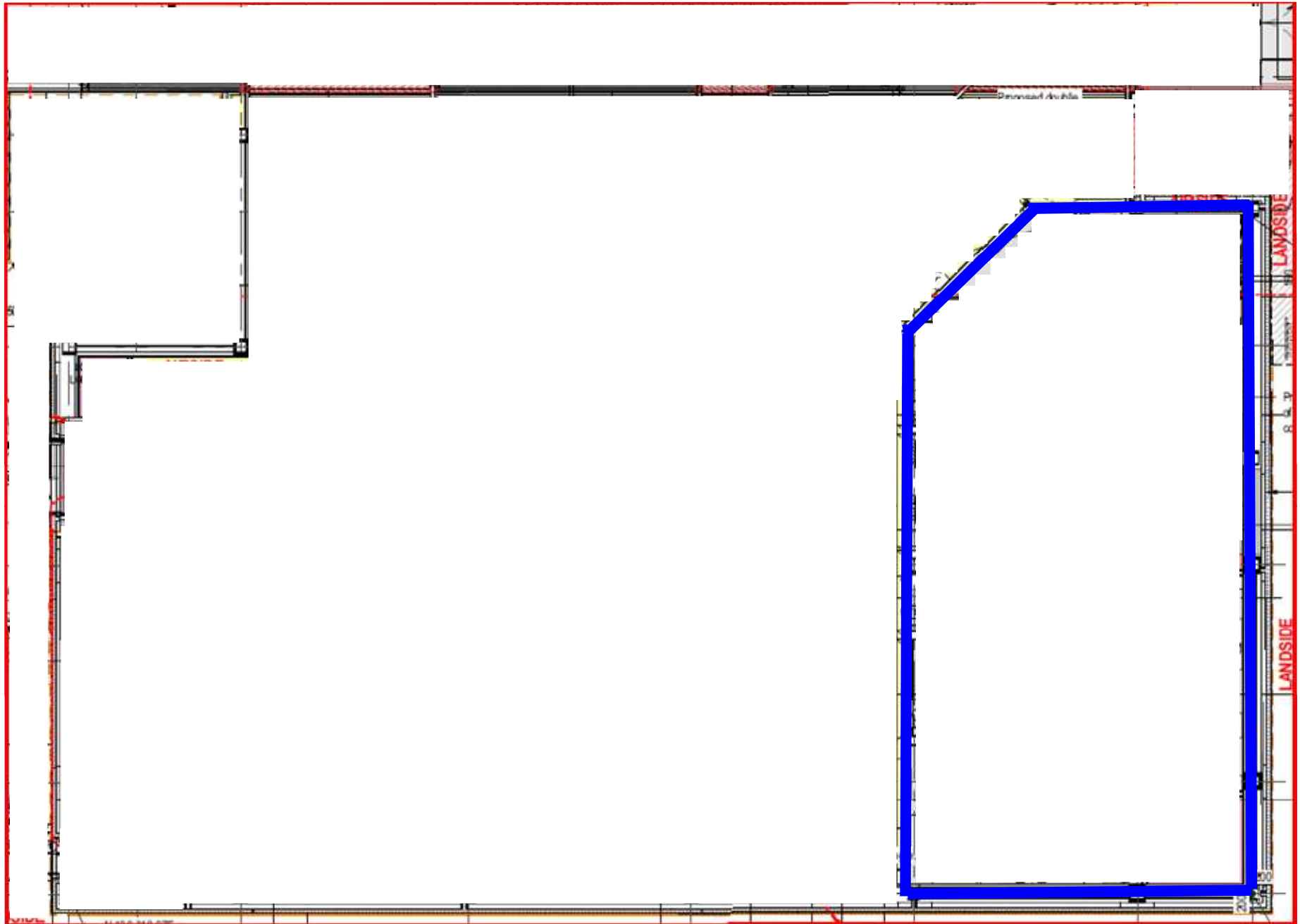
X Notice locations



 Ordnance Survey
Map scale 1:5,650
 Assumes printed map area measures 395mm by 272mm.

**ORBITAL
WITNESS**

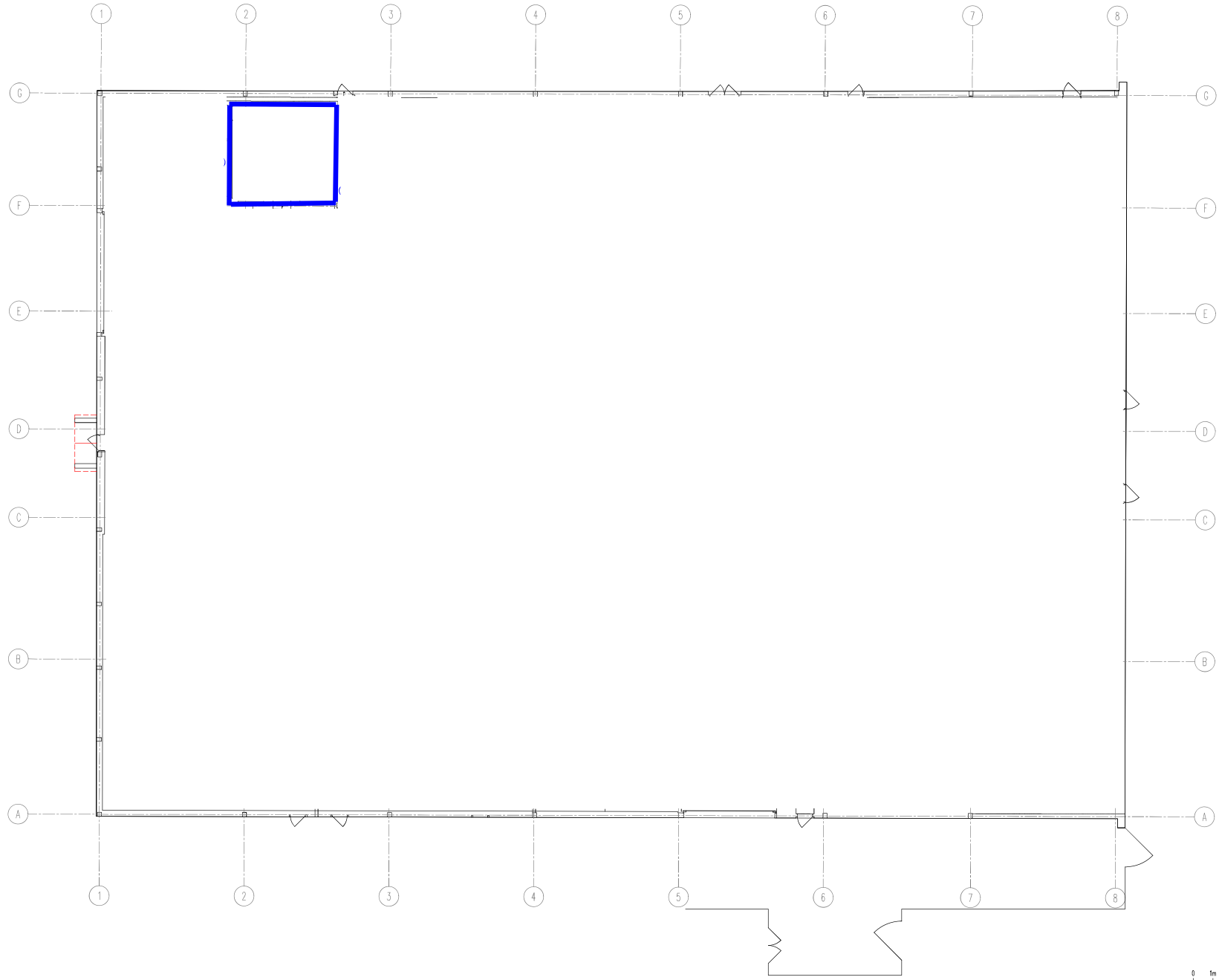




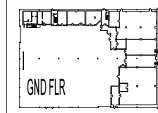
Blue Shed - Ground Floor

Plan 5

General Notes:



B Room Numbers Added	01/11/16
A Door Numbers Added	01/03/16



London City Airport, City Aviation House
Royal Docks, London, E16 2PB

RECORD DRAWING

BLUE SHED

Ground Floor
General Arrangement Plan



123

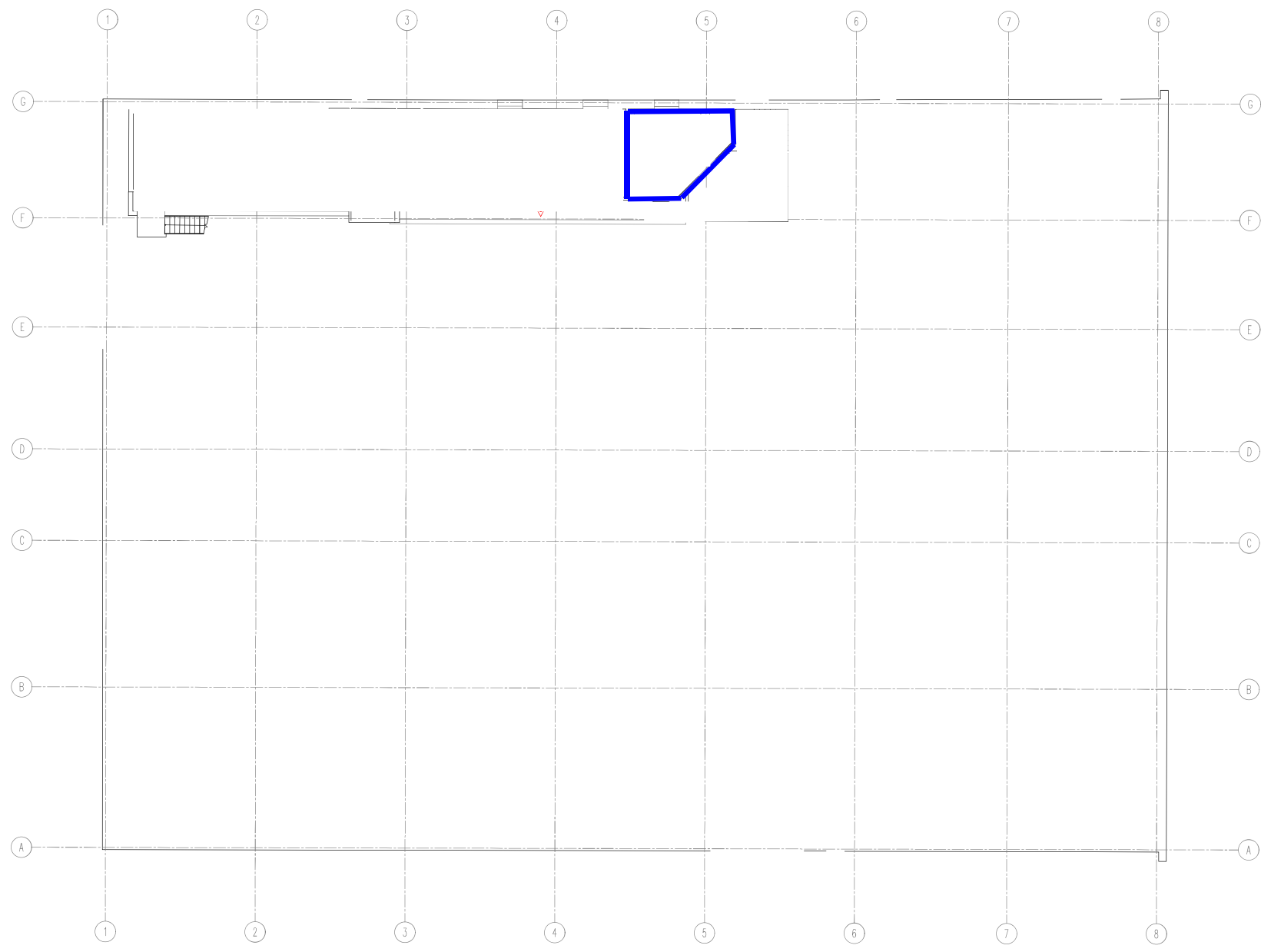
Drawn	04/08/15	VR	Checked	04/08/15	VR
Scale	1:100		Sheet	B	
Project	R/BS/G/A/001		Disc	B	
Copyright	© 2015 Balfour Beatty Construction Limited. All rights reserved. This drawing is the property of Balfour Beatty Construction Limited. It is not to be used, copied, or reproduced in any form without the written permission of Balfour Beatty Construction Limited.				
Scale	1:100		Sheet	B	

Blue Shed - First Floor

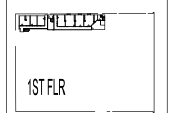
Plan 6

General Notes:

LEGEND
 FIRE DOOR
 STANDARD DOOR



B	Room Numbers Added	01/11/16
A	Door Numbers Added	01/03/16

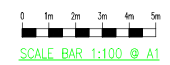


London City Airport
 Get closer.
 London City Airport, City Aviation House
 Royal Docks, London, E16 2PB

RECORD DRAWING

BLUE SHED

Drawn	04/08/15	VR	Checked		
Issue			Issue		
R/BS/1/A/001			B		
1:100			1:100		



Jet Centre - Ground Floor

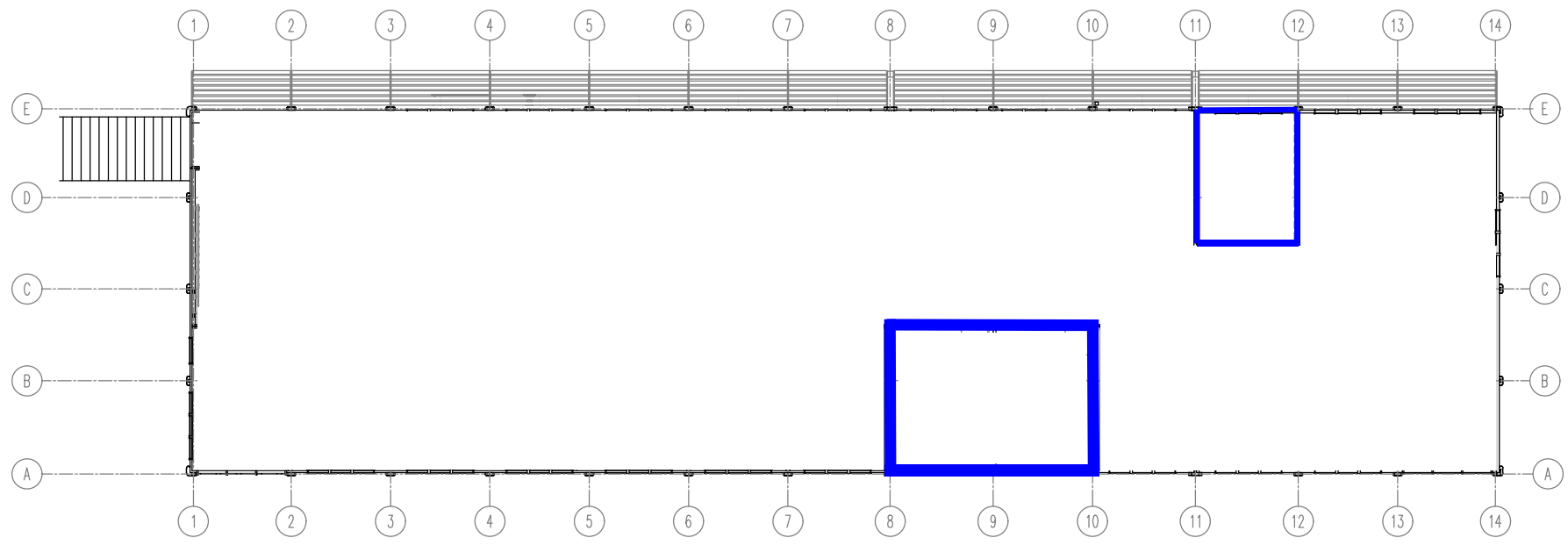
Plan 7

DO NOT SCALE - IF IN DOUBT ASK Associated Drawing

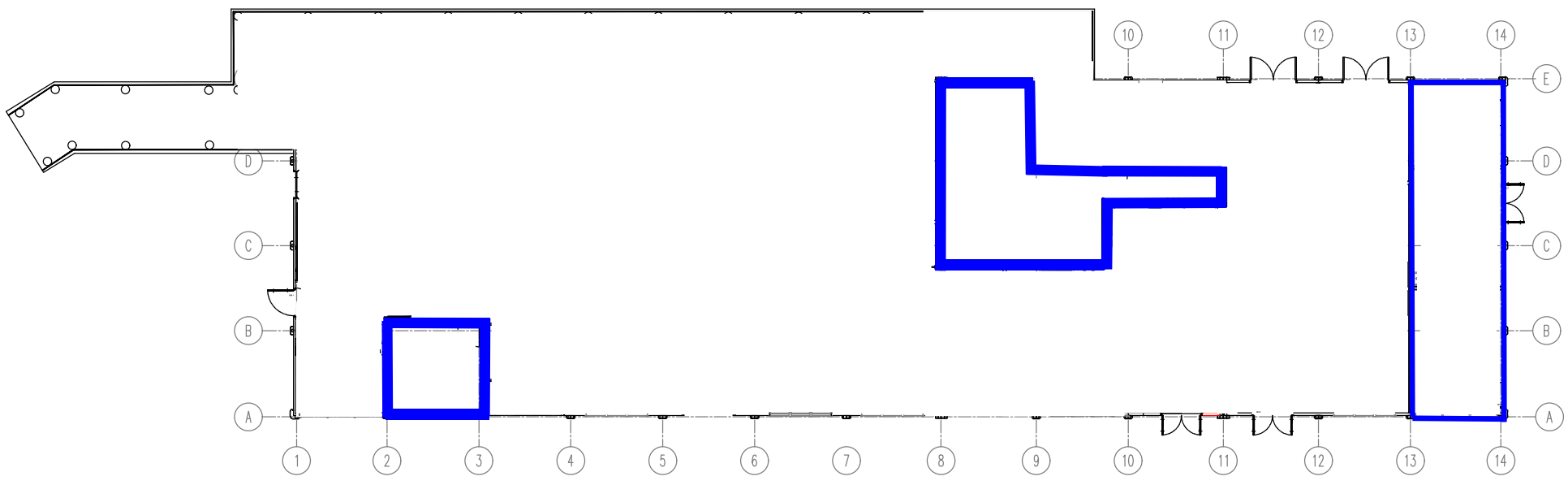
General Notes

LEGEND

-  Fire Door
-  Standard Door



Jet Centre - First Floor



E Item Numbers Added	16/06/18
D Layout amended	19/06/18
C Item Numbers Added	04/06/18
B Item Numbers Added	04/02/18
A Modified as Indicated	15/06/15

G+1 FLRS

London City Airport
Get closer.
London City Airport, City Action House
Royal Dock, London, E16 1JH

RECORD DRAWING

JET CENTRE

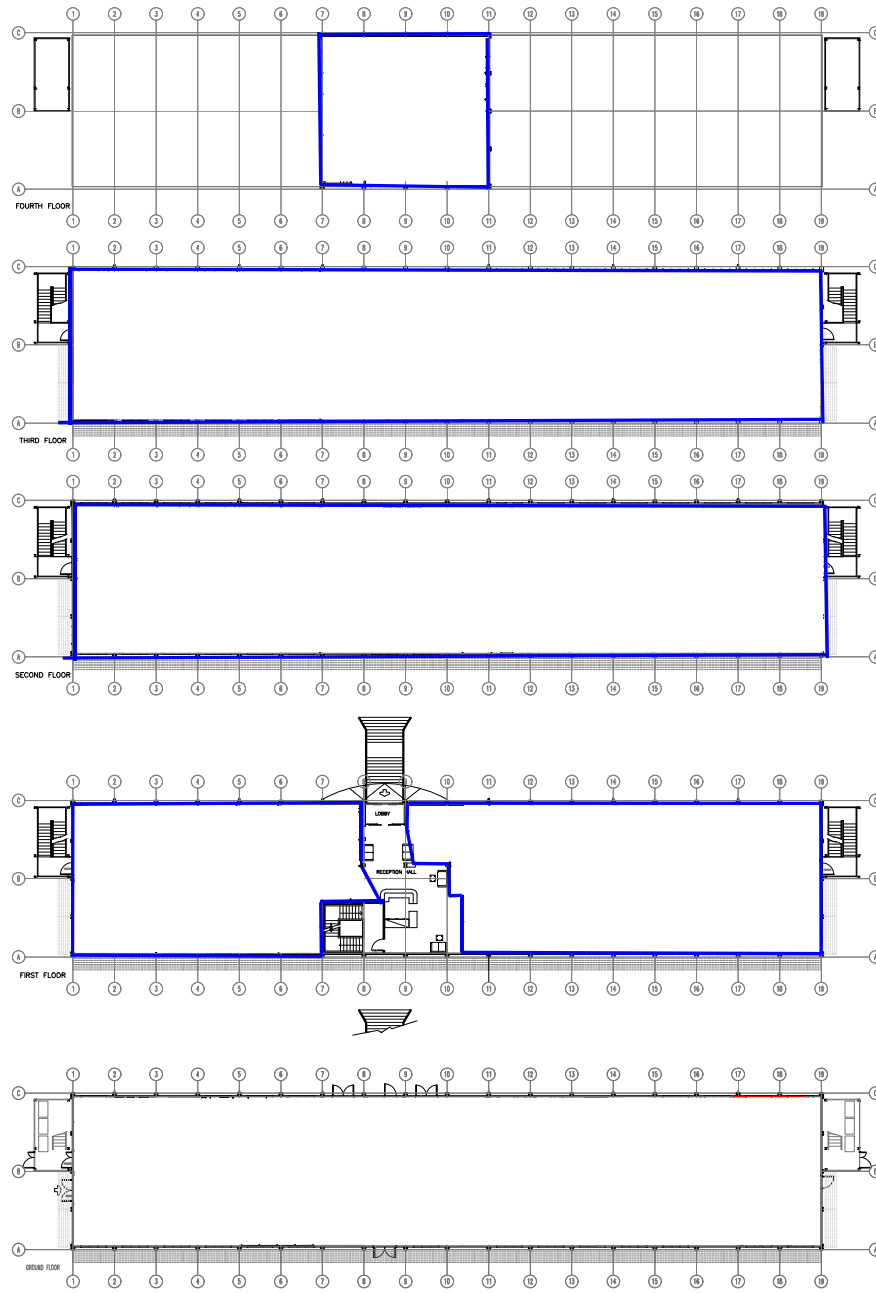
Sheet 11
Ground to First Floor
General Arrangement Plan



24/07/15 VR
125 R/JC/A/001
175

City Aviation House

Plan



0 1/4" = 1'-0"
 SCALE: ARCH. 1/16" = 1'-0"
 SCALE: ENG. 1/32" = 1'-0"

<p>PROJECT: CITY AVIATION HOUSE SHEET: 01-01 DATE: 01/15/2015 DRAWN BY: RICHARD A. ADRIANO CHECKED BY: [REDACTED]</p>	<p>OWNER: LANSLOW CITY AIRPORT ARCHITECT: RICHARD A. ADRIANO ARCHITECTS, INC. 1000 S. GARDNER AVENUE, SUITE 100 ANAHEIM, CA 92805 TEL: 714.771.1111 FAX: 714.771.1112 WWW: WWW.RAARCHITECTS.COM</p>	<p>RECORD DRAWING CITY AVIATION HSE RICHARD A. ADRIANO ARCHITECTS, INC. 1000 S. GARDNER AVENUE, SUITE 100 ANAHEIM, CA 92805 TEL: 714.771.1111 FAX: 714.771.1112 WWW: WWW.RAARCHITECTS.COM</p>	<p>DATE: 01/15/2015 DRAWN BY: RICHARD A. ADRIANO CHECKED BY: [REDACTED]</p>	<p>1. 1/4" = 1'-0" 2. 1/8" = 1'-0" 3. 1/16" = 1'-0" 4. 1/32" = 1'-0"</p>
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SCHEDULE 2 - UNDERTAKING GIVEN BY THE CLAIMANTS

- (1) The Claimants will take steps to notify Persons Unknown of the claim form, application notice, evidence in support, the Note of the Hearing on 20 June 2024, and the Order as soon as practicable and no later than 5pm on Monday 24 June 2024.

- (2) The Claimants will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a future Defendant and the Court finds that the future Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION

BEFORE: HER HONOUR JUDGE COE K.C.

DATED: 5 July 2024

BETWEEN:-

- (1) MANCHESTER AIRPORT PLC**
- (2) AIRPORT CITY (MANCHESTER) LTD**
- (3) MANCHESTER AIRPORT CAR PARK (1) LIMITED**
- (4) STANSTED AIRPORT LTD**
- (5) EAST MIDLANDS INTERNATIONAL AIRPORT LTD**



Claimants

- v -

KB-2024-002132

- (1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT MANCHESTER AIRPORT SHOWN EDGED RED ON PLAN 1 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)**
- (2) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT STANSTED AIRPORT SHOWN EDGED RED ON PLAN 2 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)**
- (3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTEST ON THE PREMISES AT EAST MIDLANDS AIRPORT SHOWN EDGED RED ON PLAN 3 OR ON ANY FLIGHT THEREFROM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION OR OTHERWISE)**

Defendants

ORDER

PENAL NOTICE

IF YOU THE WITHIN 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 OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR PERSONS UNKNOWN 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 Claimants' claim by the Claim Form dated 3 July 2024

AND UPON the Claimants' application for an injunction dated 4 July 2024 ("**the Application**")

AND UPON READING the Application, the witness statement of David John McBride dated 4 July 2024, and the witness statement of Stuart Sherbrooke Wortley dated 4 July 2024 ("**the Witness Statements**")

AND UPON hearing Leading and Junior Counsel for the Claimants

AND UPON the Fifth Claimant giving and the Court accepting the undertakings set out in Schedule 2 to this Order

IT IS ORDERED THAT:

DEFINITIONS

1. "**East Midlands Airport**" means the land shown in red outlined in red on Plan 3 to the Claim Form, appended to this Order in Schedule 1 ("**Plan 3**").

2. **“Warning Notice”** means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address (<https://www.eastmidlandsairport.com/injunction/>) at which copies of this Order may be viewed and downloaded).

INJUNCTION

3. With immediate effect, unless varied, discharged or extended by further order, the Third Defendants and each of them are forbidden from doing the following:
 - a. Entering, occupying or remaining on any part of East Midlands Airport without the consent of the Fifth Claimant;
 - b. Affixing themselves to any other person or object on East Midlands Airport;
 - c. Impeding access to or enjoyment of East Midlands Airport by the Fifth Claimant and those authorised by the Fifth Claimant, whether by blocking any entrance or otherwise;
 - d. Continuing to do any act prohibited by paragraphs 3(a) to (c) above.
4. This Order is subject to periodic review by the Court on application by the Fifth Claimant at intervals not exceeding 12 months.

SERVICE

5. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the Fifth Claimant shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits (**“the Claim Documents”**) upon the Third Defendants:
 - a. Uploading a copy onto the following website:
<https://www.eastmidlandsairport.com/injunction/>
 - b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above.

- c. Affixing a notice at those locations marked with an "X" on Plan 3 setting out where these documents can be found and obtained in hard copy.
6. Pursuant to CPR 6.27, and r. 81.4(2)(c) and (d), this Order shall be served on the Third Defendants by the Fifth Claimant carrying out each of the following steps:
 - a. Uploading a copy of the Order onto the following website: <https://www.eastmidlandsairport.com/injunction/>
 - b. Sending an email to the email addresses listed in Schedule 3 to this Order attaching a copy of this Order.
 - c. Affixing a copy of the Order in A4 size in a clear plastic envelope at those locations marked with an "X" on Plan 3.
 - d. Affixing Warning Notices of A2 size at those locations marked with an "X" on Plan 3.
7. The taking of such steps set out at paragraph 5 and 6 shall be good and sufficient service of this Order and of the Claim Documents upon the Third Defendants and each of them.
8. The Court will provide sealed copies of this Order to the Fifth Claimant's solicitors for service (whose details are set out below).
9. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 5. The step described at paragraph 5(c) will be completed when those documents are first affixed regardless of whether they are subsequently removed.

FURTHER DIRECTIONS

10. Service on the Third Defendants of any further applications or documents in the proceedings by the Fifth Claimant shall be effected by carrying out each of the steps in paragraphs 5(a) to (c).
11. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Fifth Claimant's solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Fifth Claimant's solicitors at least 48 hours in advance of any hearing.

12. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
13. The Fifth Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.
14. No acknowledgment of service, admission or defence is required by any party until further so ordered.
15. Costs are reserved.

COMMUNICATIONS WITH THE FIFTH CLAIMANT

16. The Fifth Claimant's solicitors and their contact details are:

(1) Stuart Wortley
Eversheds Sutherland (International) LLP
StuartWortley@eversheds-sutherland.com
07712 881 393

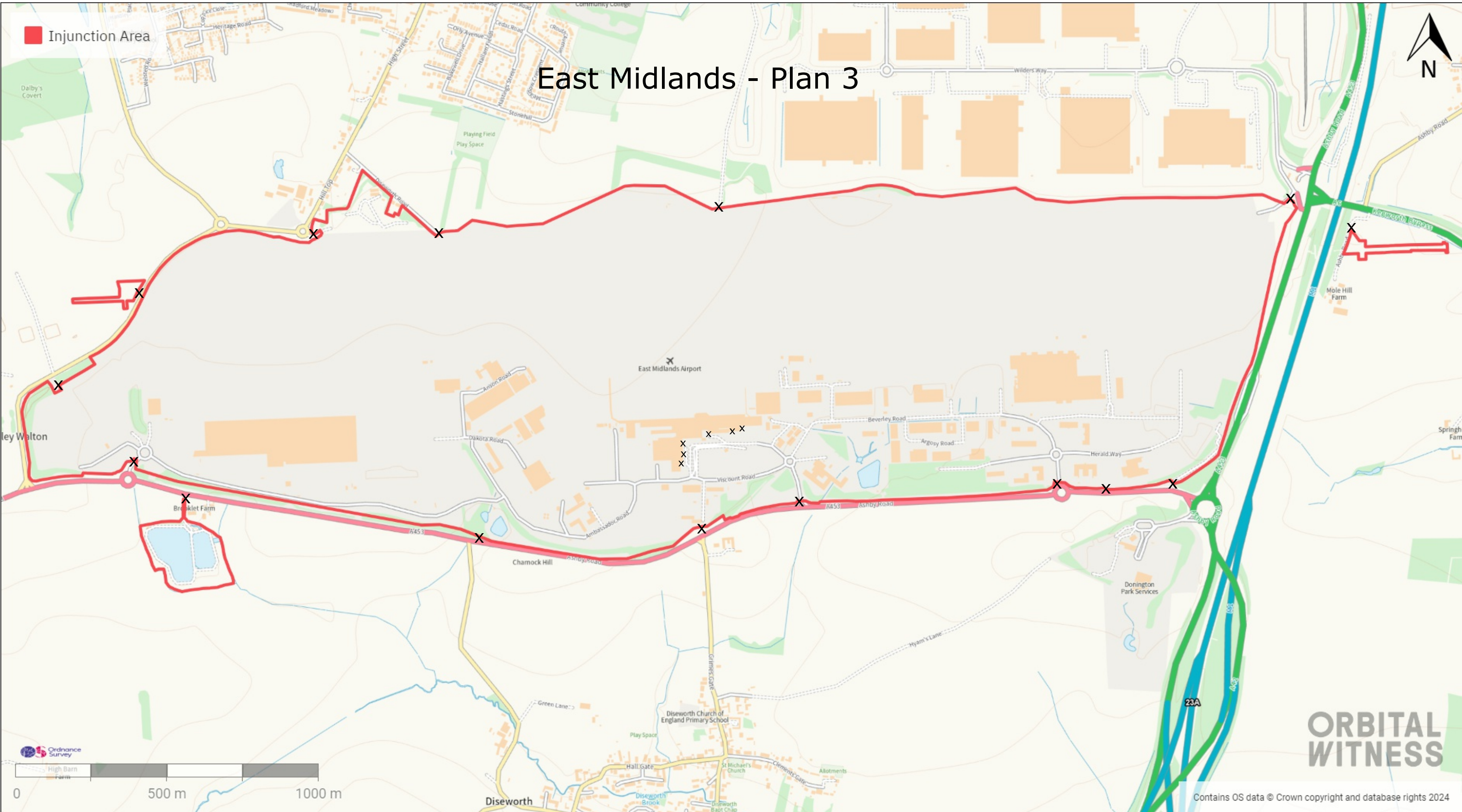
(2) Nawaaz Allybokus
Eversheds Sutherland (International) LLP
NawaazAllybokus@eversheds-sutherland.com
07920 590 944

(3) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1

Injunction Area

East Midlands - Plan 3



**ORBITAL
WITNESS**

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SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FIFTH CLAIMANT

- (1) The Fifth Claimant will take steps to serve the Third Defendants with a note of the hearing dated 5 July 2024 by 19 July 2024.

- (2) The Fifth Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 3 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 - EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 - WARNING NOTICE

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 5 JULY 2024

TO: Persons Unknown whose purpose is or includes protest on the premises at East Midlands International Airport shown edged red on the Plan below or on any flight therefrom (whether in connection with the Just Stop Oil and/or Extinction Rebellion campaign or otherwise) and who enter upon those premises; and Persons Unknown who protest on those premises (whether in connection with the Just Stop Oil and/or Extinction Rebellion campaign or otherwise) (the **"Defendants"**)

FROM: East Midlands International Airport Ltd ("the **Fifth Claimant**")

This notice relates to the land known as East Midlands International Airport, Castle Donnington, Derby, DE74 2SA which is shown edged red on the Plan below (the **"Airport"**)

The Order prohibits:

1. Entering, occupying or remaining upon any part of the Airport without the consent of the Fifth Claimant
2. Affixing themselves to any other person or object on the Airport.
3. Impeding access to or enjoyment of the Airport by the Fifth Claimant or those authorised by the Fifth Claimant, whether by blocking access to any entrance or otherwise.

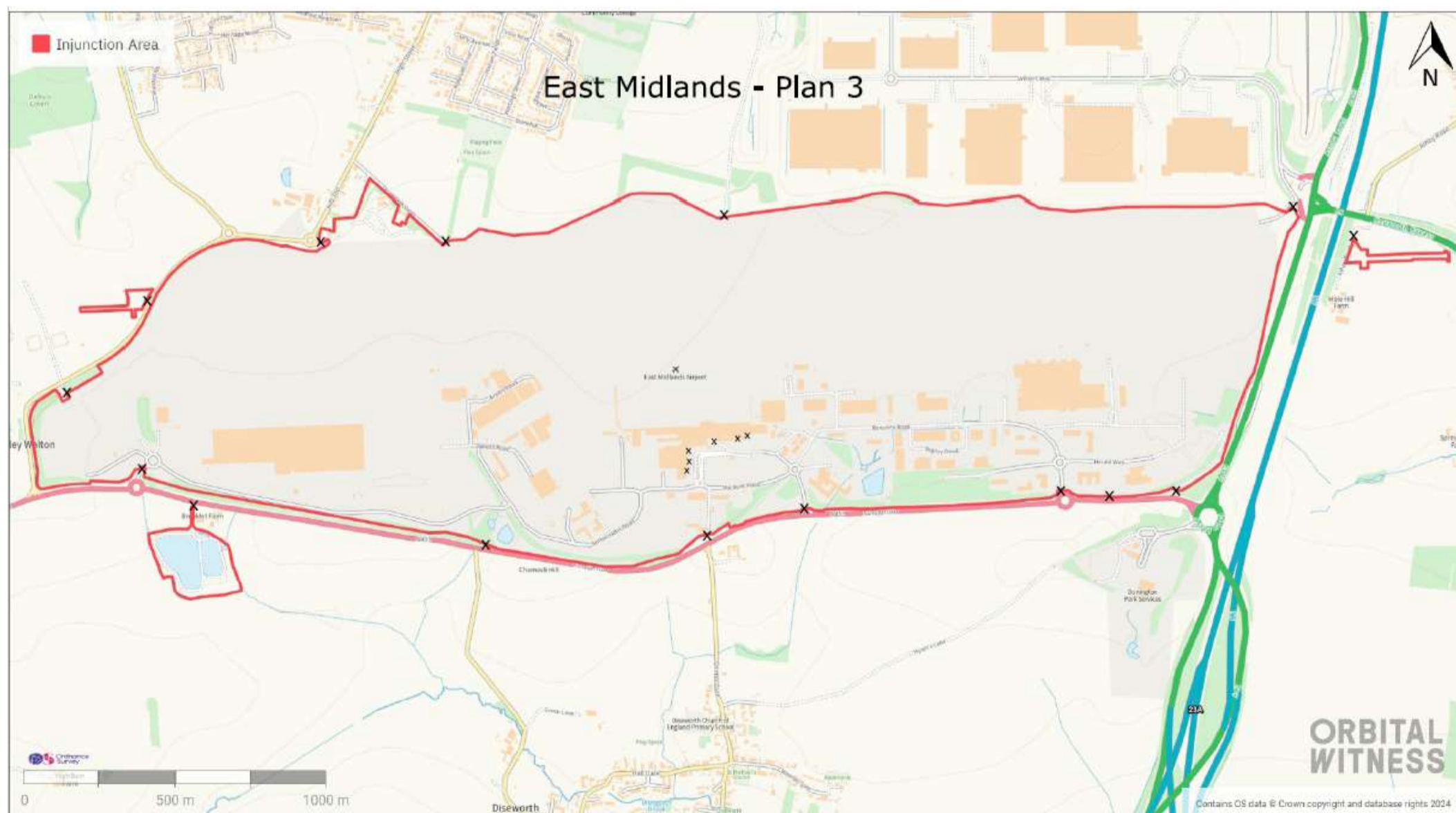
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any 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 inform the Fifth Claimant's solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 5 July 2024 may be viewed at: <https://www.eastmidlandsairport.com/injunction/>

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email stuartwortley@eversheds-sutherland.com.



IN THE HIGH COURT OF JUSTICE

Claim No: KB-2024-002210

KINGS BENCH DIVISION

Before The Honourable Mr Justice Julian Knowles

BETWEEN:

HEATHROW AIRPORT LIMITED

-and-

PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OR REMAIN (WITHOUT THE CLAIMANT'S CONSENT) UPON 'LONDON HEATHROW AIRPORT' AS IS SHOWN EDGED PURPLE ON THE ATTACHED PLAN A TO THE PARTICULARS OF CLAIM



Defendants

ORDER

PENAL NOTICE

IF YOU THE WITHIN DEFENDANTS OR PERSONS UNKNOWN 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 OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR PERSONS UNKNOWN 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 AND PERSONS UNKNOWN

This Order prohibits you from doing the acts set out in this Order. You should read it 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 having issued this Claim by a Claim Form dated 7 July 2024

AND UPON hearing the Claimant's application for an interim injunction by Application Notice dated 7 July 2024

AND UPON READING the Witness Statements of Akhil Markanday dated 6 July 2024 and Jonathan Daniel Coen dated 7 July 2024

AND UPON HEARING Leading Counsel and Junior Counsel for the Claimant

AND UPON the Claimant giving and the Court accepting the undertakings set out in Schedule 1 to this Order

IT IS ORDERED THAT:

INJUNCTION

1. Until 9 July 2029 or final determination of the Claim or further order in the meantime, whichever shall be the earlier, the Defendants must not, without the consent of the Claimant, enter, occupy or remain on Heathrow Airport, Hounslow, Middlesex, as shown edged purple on the plan annexed to this Order at Schedule 2 ("Plan A").
2. In respect of paragraph 1, the Defendants must not (a) do it himself/herself/themselves in any other way (b) do it by means of another person acting on his/her/their behalf, or acting on his/her/their instructions.
3. The injunction set out at paragraph 1 of this Order shall be reviewed annually on each anniversary of the Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 1 ½ hours. The Claimant is permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton Arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the hearing.

VARIATION

4. Anyone served with or notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimant's solicitors 72 hours' notice of such application. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Claimant's solicitors at least 48 hours in advance of any hearing.
5. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
6. The Claimant has liberty to apply to vary this Order.

SERVICE AND NOTIFICATION

7. Service of the Claim Form, the Application for interim injunction and this Order is dispensed with, pursuant to CPR 6.16, 6.28 and 81.4(2)(c).
8. Pursuant to the guidance in *Wolverhampton CC v London Gypsies & Travellers* [2024] 2 WLR 45, the Claim Form, Application Notice, evidence in support and a Note of the Hearing on 9 July 2024 will be notified to the Defendants by the Claimant carrying out each of the following steps:
 - 8.1 Uploading a copy on to the following website: www.heathrow.com/injunction
 - 8.2 Sending an email to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made and that the documents can be found at the website referred to above.
 - 8.3 Either affixing a notice at the locations shown marked with a red dot on the second plan attached to this Order at Schedule 4 ("Plan B") setting out where these documents can be found and obtained in hard copy or including this information in the warning notices referred to at paragraph 9.4 below.

9. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, this Order shall be notified to the Defendants by the Claimant carrying out each of the following steps:
 - 9.1 Uploading a copy of the Order on to the following website:
www.heathrow.com/injunction
 - 9.2 Sending an email to the email addresses listed in Schedule 3 to this Order attaching a copy of this Order.
 - 9.3 Affixing a copy of the Order in A4 size in a clear plastic envelope at each of the locations shown with a red dot on Plan B.
 - 9.4 Affixing warning notices of A2 size at those locations marked with a red dot on Plan B, substantially in the form of the notice at Schedule 5.

10. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification to the Defendants of any further applications shall be effected by the Claimant carrying out each of the following steps:
 - 10.1 Uploading a copy of the application on to the following website:
www.heathrow.com/injunction
 - 10.2 Sending an email to the email addresses listed in Schedule 3 to this Order stating that an application has been made and that the application documents can be found at the website referred to above.
 - 10.3 Affixing a notice at these locations marked with a red dot on Plan B stating that the application has been made and where it can be accessed in hard copy and online.

11. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification of any further documents to the Defendants may be effected by carrying out the steps set out in paragraphs 10.1 and 10.2 only.

12. In respect of paragraphs 8 to 11 above, effective notification will be deemed to have taken place on the date on which all the relevant steps have been carried out.
13. For the avoidance of doubt, in respect of the steps referred to at paragraphs 8.3, 9.3 and 10.3, effective notification will be deemed to have taken place when the documents have all been first affixed regardless of whether they are subsequently removed.

FURTHER DIRECTIONS

14. Liberty to apply.

COSTS

15. Costs reserved.

COMMUNICATIONS WITH THE CLAIMANT

16. The Claimant's solicitors and their contact details are:

- (1) Akhil Markanday

Bryan Cave Leighton Paisner, Governor's House, 5 Laurence Pountney Hill,
London EC4R 0BR akhil.markanday@bclplaw.com / +44 20 3400 4344

- (2) Phil Spencer

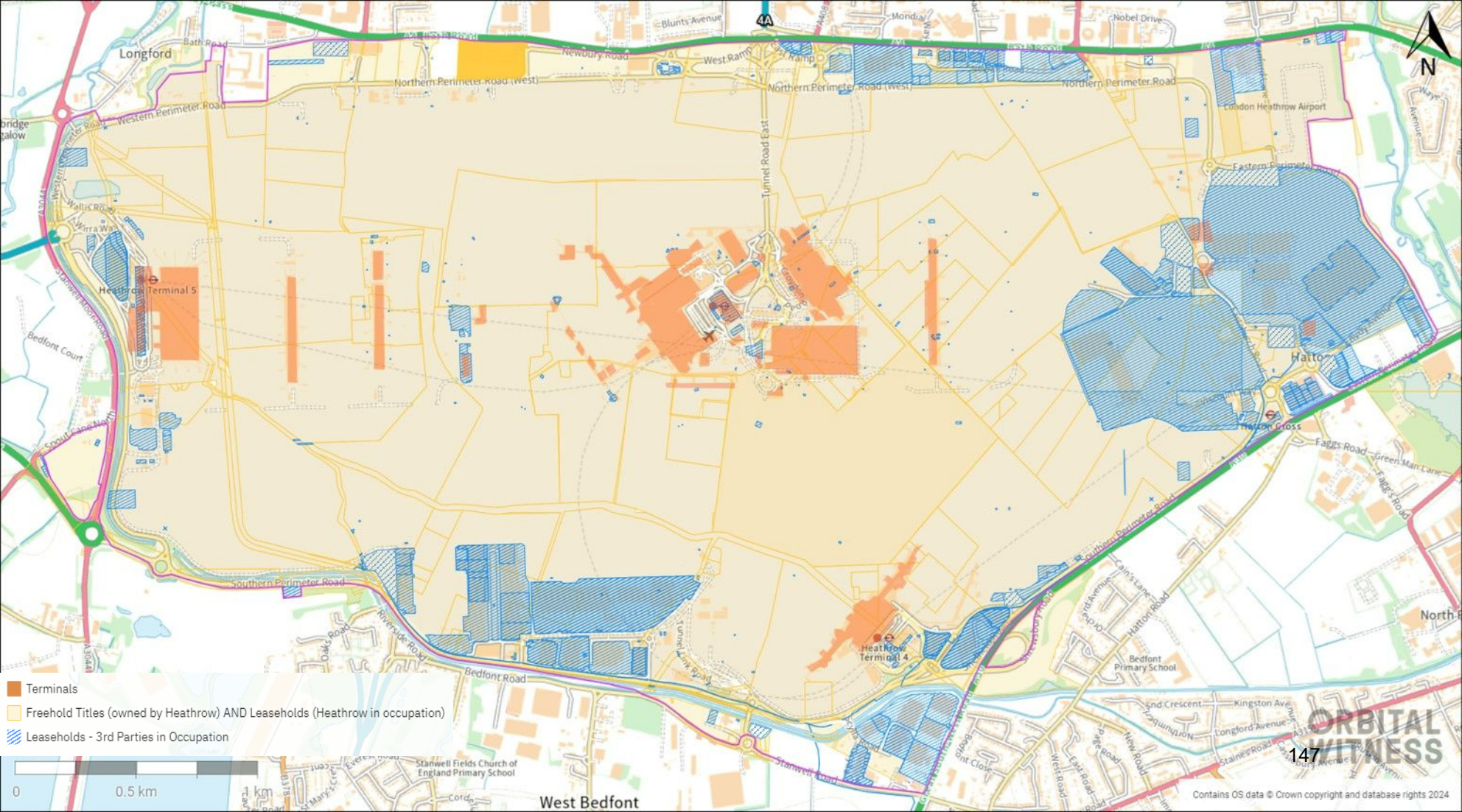
Bryan Cave Leighton Paisner, Governor's House, 5 Laurence Pountney Hill,
London EC4R 0BR phil.spencer@bclplaw.com / +44 20 3400 3119

Dated: 9 July 2024

SCHEDULE 1 – UNDERTAKINGS

1. The Claimant will take steps to notify Defendants of the Claim Form, Application Notice, evidence in support, the Order and a Note of the Hearing on 9 July 2024 as soon as practicable and no later than 5pm on 15 July 2024.
2. The Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a future Defendant and the Court finds that the future Defendant ought to be compensated for that loss.

SCHEDULE 2 – PLAN A



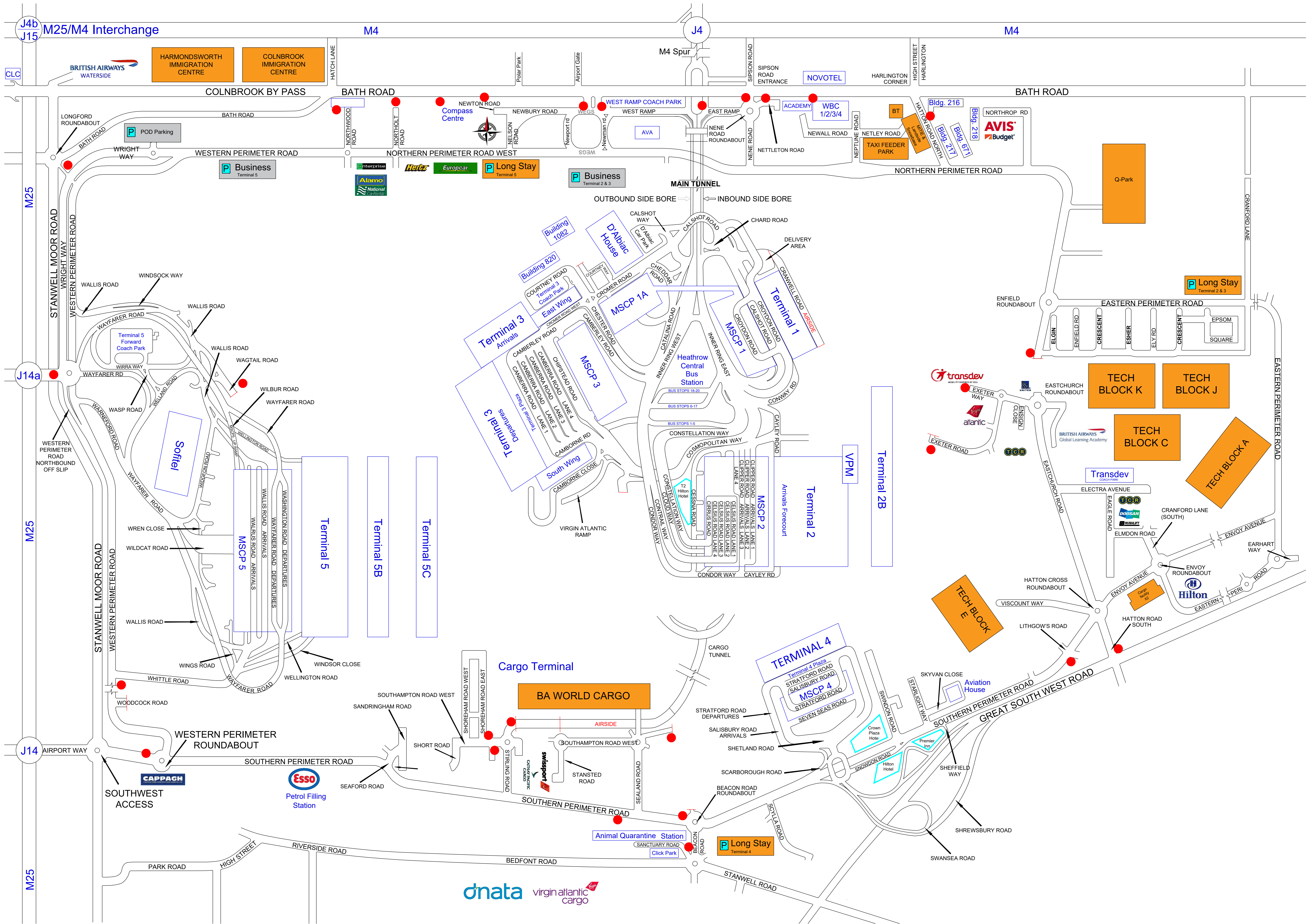
- Terminals
- Freehold Titles (owned by Heathrow) AND Leaseholds (Heathrow in occupation)
- Leaseholds - 3rd Parties in Occupation



SCHEDULE 3 – EMAIL ADDRESSES

1. juststopoil@protonmail.com
2. juststopoilpress@protonmail.com
3. info@juststopoil.org

SCHEDULE 4 – PLAN B

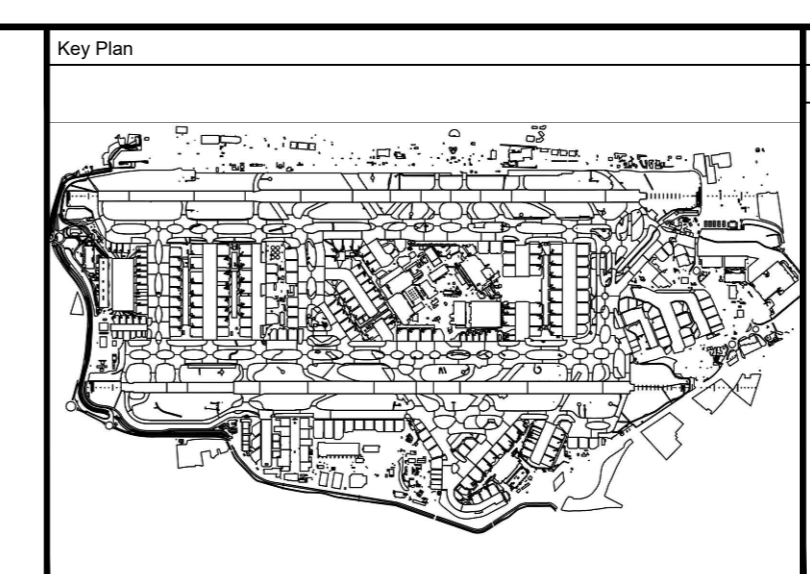


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HEATHROW MASTER DRAWING
 This master drawing is maintained to reflect the current installation at all times. Please
 notify errors or omissions to the Heathrow Airport LTD Asset Information Team. e-mail:
 Assetinformation@heathrow.com

Model / Content References List - Name, Version & Status.

This area is for Drawing Originator's Company Logo and
 Company Details appropriate for the BAA Project.
 CAD User to insert the block within this space.



No	Date	Description of Change	By	App
1/1	18/07/24	RELEASED FOR INFORMATION		

HEATHROW PUBLIC
 LANDSIDE ROADS
 SCHEMATIC

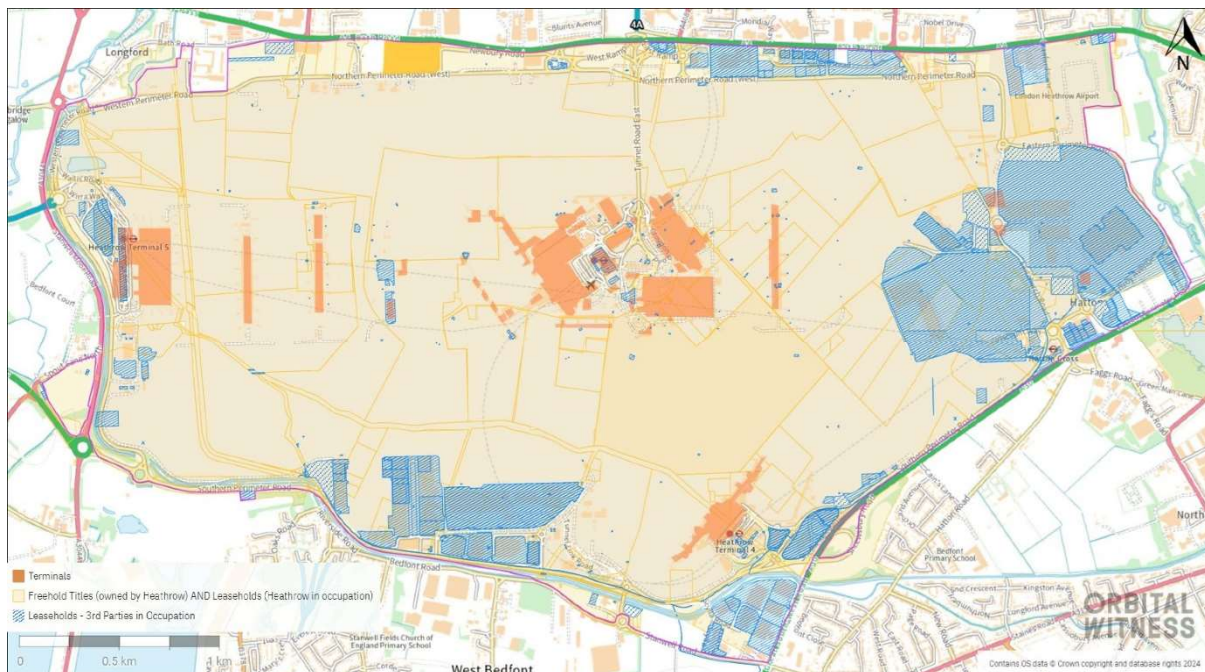


Project Name	Heathrow Project No.	© Heathrow Airport Limited 2024
Programme Name	Originator Project No.	
Company	Drawn By	CHK/Approval
HEATHROW	ATIC	ATIC
Location-Level-Sub-Series/System Identifier	Draw Date	Status
10000-XX-SC-736-000002	05/07/24	PG
	Version	
	1.0	

SCHEDULE 5 – NOTICE
WARNING – NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted in Claim No KB-2024-002210 granted on 9 July 2024 until 9 July 2029 or final determination of the Claim or further order in the meantime, whichever shall be the earlier, now exists in relation to Heathrow Airport. The injunction means you may NOT without the express consent of HEATHROW AIRPORT LIMITED:

IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN ENTER, OCCUPY OR REMAIN UPON 'LONDON HEATHROW AIRPORT' AS IS SHOWN EDGED PURPLE ON THE PLAN BELOW:



ANYONE BREACHING THE TERMS OF THIS COURT ORDER OR ASSISTING ANY OTHER PERSON IN BREACHING THE TERMS OF THIS ORDER MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE SENT TO PRISON, FINED, OR HAVE THEIR ASSETS SEIZED.

A copy of the legal proceedings (including the Order, Claim Form, Application Notice, evidence in support and a note of the hearing on 9 July 2024) can be viewed at www.heathrow.com/injunction or obtained from:

- (1) Compass Centre, Heathrow Airport, Nelson Road, Hounslow TW6 2GW, which is open between 9am-5pm Monday-Friday; or
- (2) Bryan Cave Leighton Paisner LLP, Governor's House, 5 Laurence Pountney Hill, London EC4R 0BR (Reference: AMRK/PSPE/20H0904.000140; Telephone: 020 3400 3119).

Anyone notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it affects that person but they must first give the Claimant's solicitors 72 hours' notice of such application. The address of the Court is the Royal Courts of Justice, Strand, London WC2A 2LL.

IN THE HIGH COURT OF JUSTICE

KINGS BENCH DIVISION

ROYAL COURTS OF JUSTICE

B E T W E E N:-

GATWICK AIRPORT LIMITED

-and-



KB-2024-002336

PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT LONDON GATWICK AIRPORT SHOWN OUTLINED IN YELLOW AND SHADED YELLOW ON PLAN 1 ATTACHED TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

Defendants

ORDER

PENAL NOTICE

IF YOU, THE DEFENDANTS, 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 OR HAVE YOUR ASSETS SEIZED.

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

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).

Before The Honourable Mr Justice Ritchie sitting at the Royal Courts of Justice, the Strand, London on 19 July 2024

UPON the Claimant’s claim by the Claim Form dated 18 July 2024

AND UPON the Claimant’s application for an injunction dated 18 July 2024 (“**the Application**”)

AND UPON READING the Application and the witness statement of Neil Harvey dated 18 July 2024 and the witness statements of Julian Pollock dated 18 July 2024, (and another) 18 July 2024 and dated 19 July 2024 (“**the Witness Statements**”)

AND UPON hearing Mr Morshead K.C. and Miss Barden for the Claimant and no one attending for the Defendant

AND UPON the Claimant giving and the Court accepting the undertakings set out in Schedule 4 to this Order

AND UPON the Claimant informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at London Gatwick Airport, as defined by this Order, should be made by email to legal@gatwickairport.com.

DEFINITIONS

“**London Gatwick Airport**” means the land shown outlined in yellow and shaded yellow on Plan 1 to the Claim Form, appended to this Order in Schedule 1 (“**Plan 1**”)

“**Warning Notice**” means a notice in the form as set out in Schedule 5 to this Order

NOW IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the Defendants are forbidden from entering, occupying or remaining on any part of London Gatwick Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Claimant.
2. For the avoidance of doubt, the Order does not apply to:
 - a. The highways shown in pink and yellow on Plan 2 in Schedule 2 to this Order,

- b. The National Rail railway station at London Gatwick Airport, located at the South Terminal and the precincts thereto up to the concourse at the South Terminal.
3. This Order is subject to periodic review by the Court on application by the Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order.

SERVICE

4. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the Claimant shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits (“**the Claim Documents**”) and this Order upon the Defendants:
 - a. Uploading a copy onto the following website:
<http://www.gatwickairport.com/injunction.html>
 - b. Sending an email with this Order attached to the email addresses listed in Schedule 3 stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above.
 - c. Affixing notices at regular intervals around the perimeter fence and at suitable entrances/exits to London Gatwick Airport where these documents can be found and obtained in hard copy in the form of Schedule 5.
5. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters news agency so that it can be used by press organisations to publicise its existence.
6. The taking of such steps set out at paragraph 4 shall be good and sufficient service of this Order and of the Claim Documents upon the Defendants.
7. The Court will provide sealed copies of this Order to the Claimant’s solicitors for service (whose details are set out below).
8. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 4. The step described at paragraph 4(c) will be completed when those notices are first affixed.
9. The deemed date of service of this Order shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 4. The step described at paragraph 4(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

10. Service on the Defendants of any further applications or documents in the proceedings by the Claimants shall be effected by carrying out each of the steps in paragraph 4.

11. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimant's solicitors 72 hours' notice of such application by email to matthew.bonye@hsf.com and graeme.robertson@hsf.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the Claimant's solicitors at least 48 hours in advance of any hearing.
12. Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow shall be notified by being sent a link to the Claim Documents and Order by email at the addresses in Schedule 3 to this Order as soon as practicable.
13. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Claimant's solicitors.
14. The Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.
15. No acknowledgment of service, admission or defence is required by any party until further so ordered.
16. The Claimant shall notify its tenants and/or licensees who have interests and/or rights in London Gatwick Airport of the making of this Order in writing and/or by providing copies of this Order to them.
17. Costs are reserved.

Ritchie J

Made 19.7.2024

COMMUNICATIONS WITH THE CLAIMANT

The Claimant's solicitors and their contact details are:

Herbert Smith Freehills LLP

Exchange House

Primrose Street

London EC2A 2EG

Attn: Matthew Bonye/Graeme Robertson

E: matthew.bonye@hsf.com; graeme.robertson@hsf.com

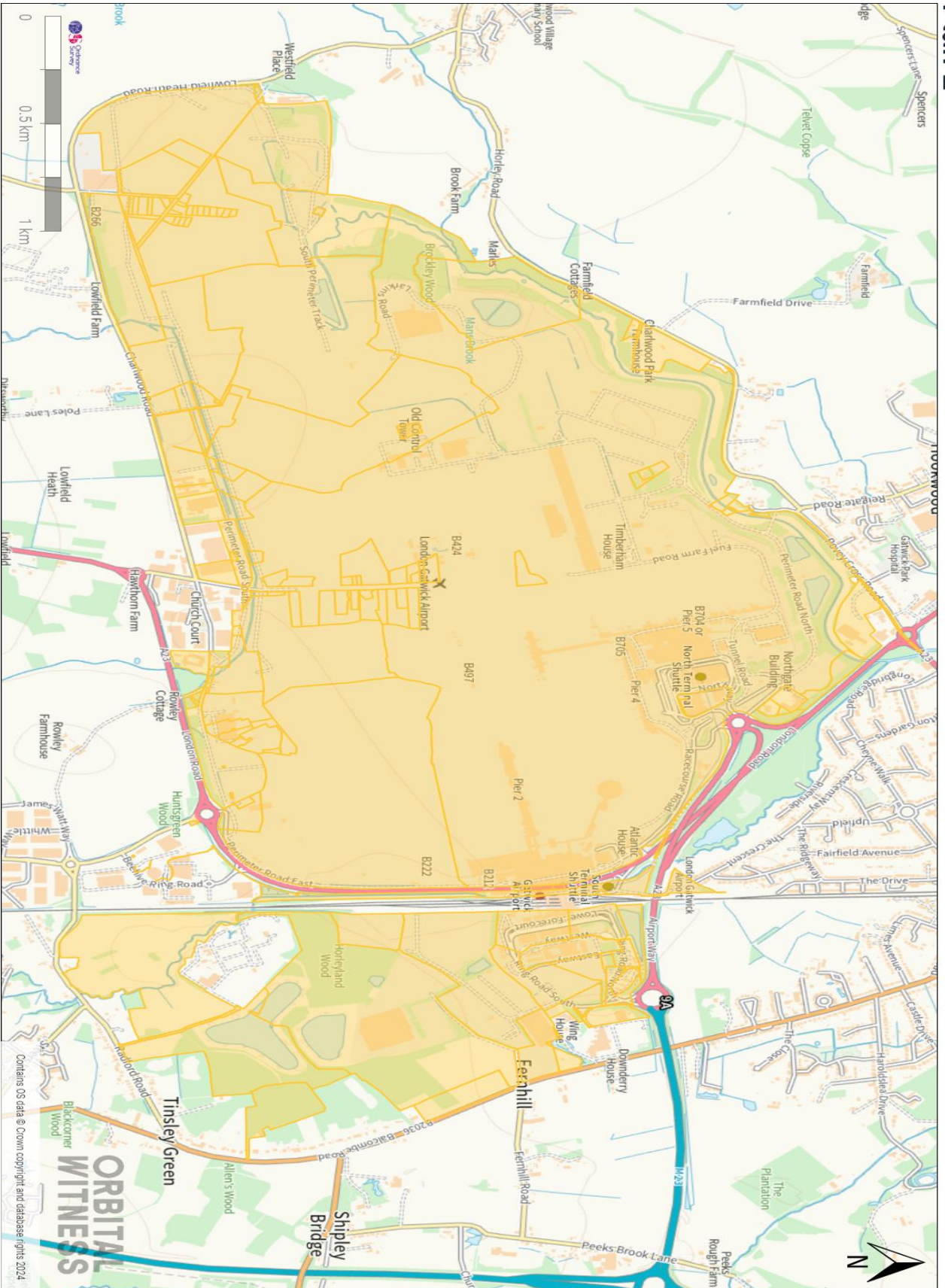
02074662162/02074662793

Communications with the Court

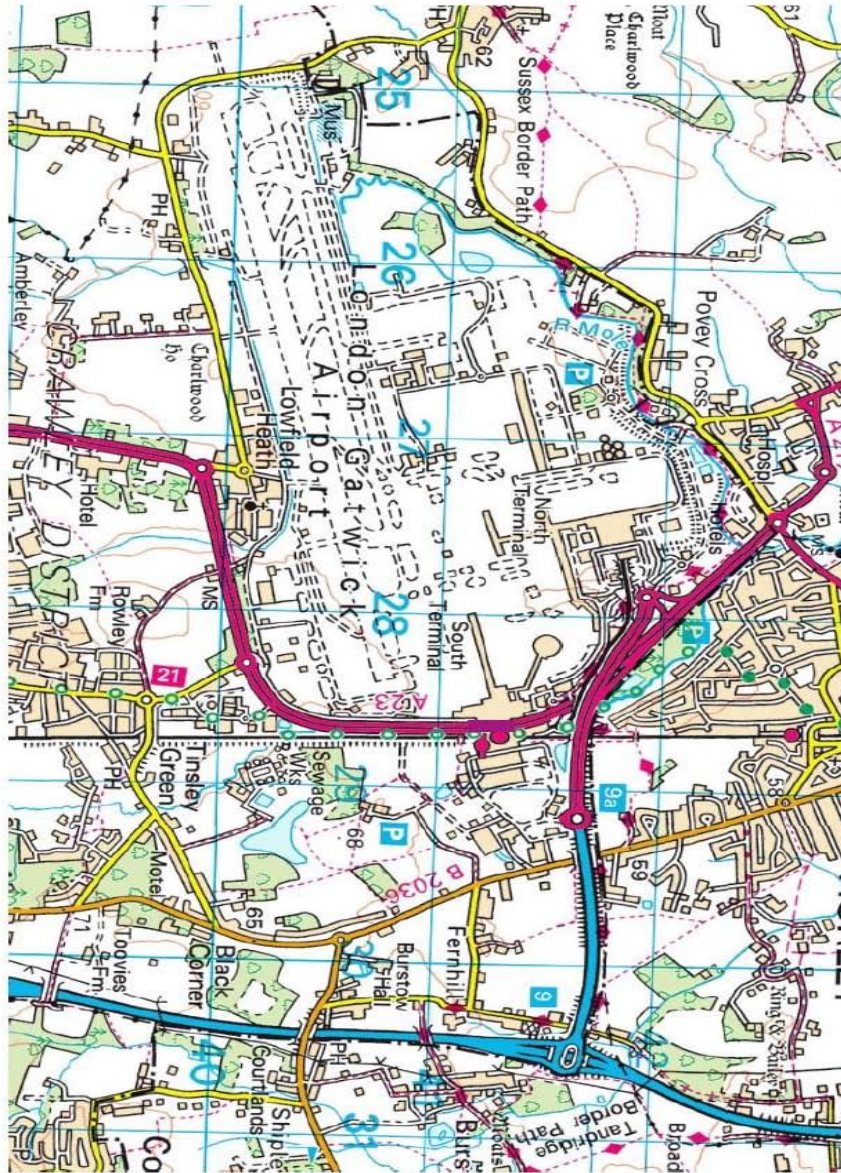
All communications to the Court about this Order should be sent to: King's Bench Division, Royal Courts of Justice, Strand, London WC2A 2LL. The offices are open between 10.00am and 4.30pm Monday to Friday except bank holidays. The telephone number is 020 7947 6000.

SCHEDULE 1

Plan 1



SCHEDULE 2



SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 - UNDERTAKINGS GIVEN BY THE CLAIMANT

- (1) The Claimant will take steps to serve the Defendant with a note of the hearing which took place on 19 July 2024 by 2 August 2024.
- (2) The Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 5 – WARNING NOTICE

HIGH COURT CLAIM NO: KB-2024-002336

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 19/7/2024

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT WHO ENTER OR REMAIN ON THE PREMISES AT LONDON GATWICK AIRPORT SHOWN OUTLINED IN YELLOW AND SHADED YELLOW ON PLAN 1 ATTACHED TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) (the “**Defendants**”)

FROM: Gatwick Airport Limited (“**the Claimant**”)

This notice relates to the land known as London Gatwick Airport, Gatwick RH6 0NP which is shown outlined in yellow and shaded yellow on the Plan below (the “**Airport**”)

The Order prohibits:

1. Entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Claimant
2. You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any 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 inform the Claimant's solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 19/7/2024 may be viewed at: 5th Floor, Destinations Place, Gatwick Airport, Gatwick, West Sussex, RH6 0NP or online at <http://www.gatwickairport.com/injunction.html>. Copies may also be obtained from the Information Desk or by contacting Matthew Bonye of Herbert Smith Freehills LLP at Exchange House, Primrose Street, London EC2A 2EG, on 0207 466 2162 or by email at matthew.bonye@hsf.com.

CLAIM NO: KB-2024-002317

IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION
ROYAL COURTS OF JUSTICE

BETWEEN:-

(1) LEEDS BRADFORD AIRPORT LIMITED

AND THREE OTHERS

- v -

(1) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

IF YOU, THE DEFENDANTS, 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 OR HAVE YOUR ASSETS SEIZED.



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

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).

BEFORE The Honourable Mr Justice Ritchie sitting at the Royal Courts of Justice, the Strand, London on 18 July 2024

UPON the Claimants' claim by the Claim Form issued on 16 July 2024

AND UPON the Claimants' ex-parte application for an injunction issued on 16 July 2024 ("**the Application**")

AND UPON READING the Application and the first witness statements: of Alexander James Wright dated 16 July 2024, 17 July 2024, (another) 17 July 2024; and 18 July 2024, Vincent Hodder dated 15 July 2024, Nicholas Jones dated 16 July 2024 and Alberto Martin dated 15 July 2024 ("**the Witness Statements**").

AND UPON hearing Mr Morshead K.C. and Miss Barden, Counsel for the Claimants and no one attending for the Defendants.

AND UPON the First Claimant giving and the Court accepting the undertakings set out in Schedule 2 to this Order.

AND UPON the First Claimant informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Leeds Bradford Airport, as defined by this Order, should be made by email to protestrequest@lba.co.uk.

DEFINITIONS

"Leeds Bradford Airport" means the land shown in red outlined in red on Plan 1 to the Claim Form, appended to this Order in Schedule 1 ("**Plan 1**").

"Warning Notice" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address

<https://www.leedsbradfordairport.co.uk/injunction>. at which copies of this Order may be viewed and downloaded).

NOW IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the First Defendant and each of them are forbidden from entering, occupying or remaining on any part of Leeds Bradford Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the First Claimant.
2. This Order is subject to periodic review by the Court on application by the First Claimant at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order.

SERVICE

3. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the First Claimant shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits (“**the Claim Documents**”) and this Order upon the First Defendant:
 - a. Uploading a copy onto the following website:
<https://www.leedsbradfordairport.co.uk/injunction>.
 - b. Sending an email to each of the email addresses listed in Schedule 3 to this Order (1) stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above and (2) attaching this Order.
 - c. Affixing a notice at those locations marked with an “X” on Plan 1 setting out where the Claim Documents and this Order can be found and obtained in hard copy in the form of Schedule 4.
4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters news agency so that it can be used by press organisations to publicise its existence.
5. The taking of such steps set out at paragraph 3 and 4 shall be good and sufficient service of this Order and of the Claim Documents upon the First Defendant and each of them.
6. The Court will provide sealed copies of this Order to the First Claimant’s solicitors for service (whose details are set out below).

7. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraph 3(c) will be completed when those notices are first affixed.
8. The deemed date of service of this Order shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3 and 4. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

9. Service on the First Defendant of any further applications or documents in the proceedings by the First Claimant shall be effected by carrying out each of the steps in paragraph 3.
10. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the First Claimant's solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the First Claimant's solicitors at least 48 hours in advance of any hearing.
11. Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow shall be notified (in so far as that is possible) by being sent a link to the Claim Documents and this Order by email addressed to them at the addresses in Schedule 3 to this Order as soon as practicable.
12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the First Claimant's solicitors.
13. The First Claimant has liberty to apply to vary, extend or discharge this Order or for further directions.
14. No acknowledgment of service, admission or defence is required by any party until further so ordered.
15. Costs are reserved.

Ritchie J

Made 19 July 2024

NOTES

COMMUNICATIONS WITH THE FIRST CLAIMANT

The First Claimant's solicitors and their contact details are:

(1) Stuart Wortley
Eversheds Sutherland (International) LLP
StuartWortley@eversheds-sutherland.com
07712 881 393

(2) Nawaaz Allybokus
Eversheds Sutherland (International) LLP
NawaazAllybokus@eversheds-sutherland.com
07920 590 944

(3) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE FIRST CLAIMANT

- (1) The First Claimant will take steps to serve the First Defendant with a note of the hearing which took place on 18 July 2024 by 1 August 2024.
- (2) The First Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

High Court Injunction in Force

NOTICE OF HIGH COURT ORDER DATED 18 JULY 2024 (“the Order”)

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT LEEDS BRADFORD AIRPORT SHOWN EDGED RED ON PLAN 1 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) (the “**Defendants**”)

FROM: Leeds Bradford Airport Limited (the “**First Claimant**”)

This notice relates to the land known as Leeds Bradford Airport which is shown edged red on the Plan below (the “**Airport**”)

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the First Claimant.

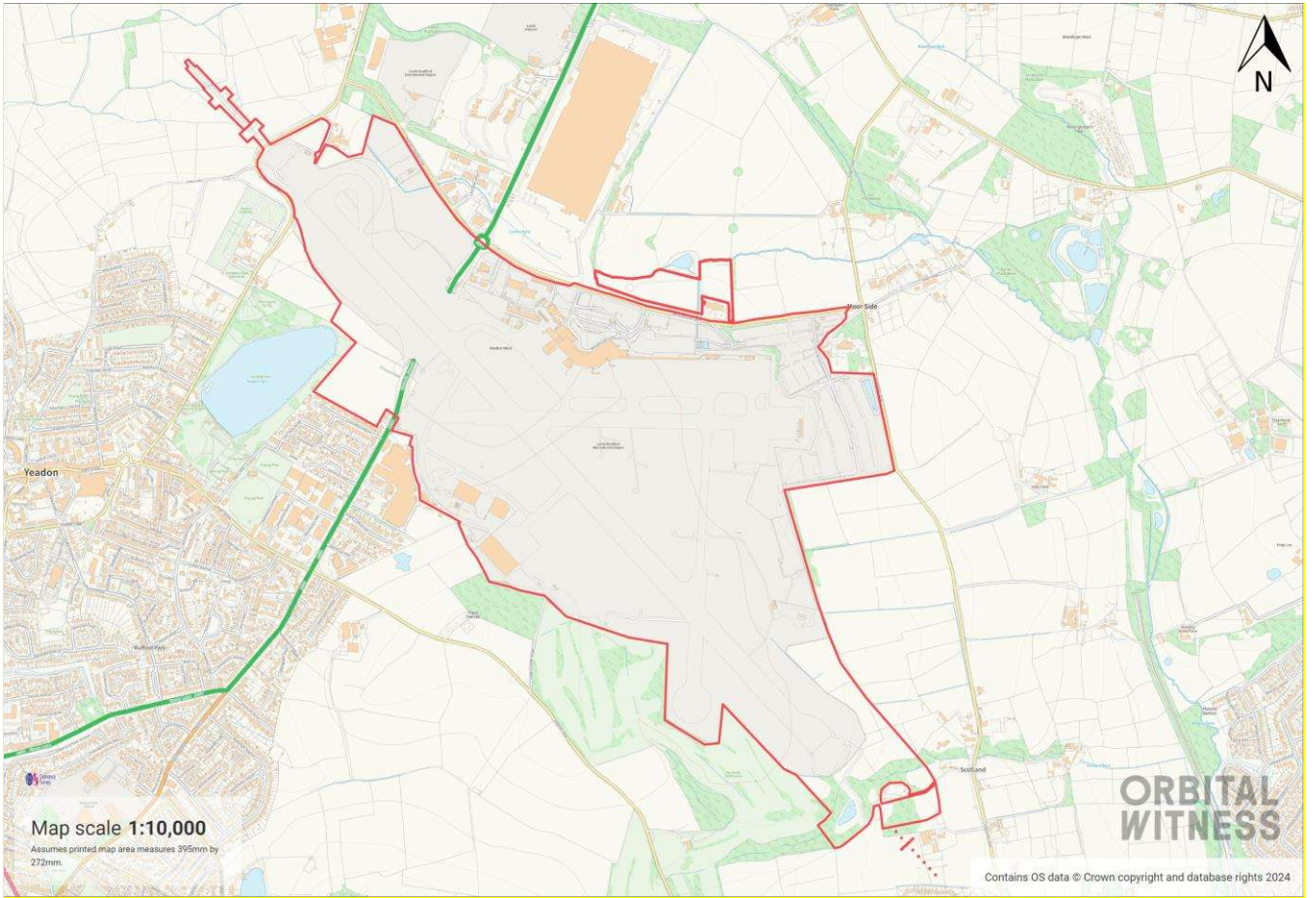
You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the First Claimant’s solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 18 July 2024 may be viewed at: <https://www.leedsbradfordairport.co.uk/injunction>

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email stuartwortley@eversheds-sutherland.com.



IN THE HIGH COURT OF JUSTICE
KINGS BENCH DIVISION
ROYAL COURTS OF JUSTICE

BETWEEN:-

(3) NEWCASTLE INTERNATIONAL AIRPORT LIMITED
(4) NIAL SERVICES LIMITED

AND TWO OTHERS



- v -

KB-2024-002317

(3) PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE)

AND TWO OTHERS

Defendants

ORDER

PENAL NOTICE

IF YOU, THE DEFENDANTS, 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 OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR ANY OF THEM TO

BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible. You have the right to apply to the court to vary or discharge this Order (which is explained below).

BEFORE The Honourable Mr Justice Ritchie on 18 July 2024

UPON the Claimants' claim by the Claim Form issued on 16 July 2024

AND UPON the Claimants' ex parte application for an injunction issued on 16 July 2024 ("**the Application**")

AND UPON READING the Application and the witness statements of: Alexander James Wright dated 16 July 2024, 17 July 2024, (and another) 17 July 2024, dated 18 July 2024, Vincent Hodder dated 15 July 2024, Nicholas Jones dated 16 July 2024 and Alberto Martin dated 15 July 2024 ("**the Witness Statements**")

AND UPON hearing Mr Morshead K.C. and Miss Barden for the Claimants and no one attending for the Defendants

AND UPON the Third and Fourth Claimants giving and the Court accepting the undertakings set out in Schedule 2 to this Order

AND UPON the Third and Fourth Claimant informing the Court that any requests from those wishing to carry out peaceful protest to designate an area for that purpose at Newcastle International Airport, as defined by this Order, should be made by email to protestrequest@newcastleinternational.co.uk

DEFINITIONS

"Newcastle International Airport" means the land shown in red outlined in red on Plan 3 to the Claim Form, appended to this Order in Schedule 1 ("**Plan 3**").

"Warning Notice" means a notice in the form as set out in Schedule 4 to this Order (and warning of the existence and general nature of this Order, the consequences of breaching it, identifying a point of contact and contact details from which copies of the Order may be requested and identifying the website address <https://www.newcastleairport.com/about-your-airport/airport-company/injunction/> at which copies of this Order may be viewed and downloaded).

IT IS ORDERED THAT:

INJUNCTION

1. With immediate effect, unless varied, discharged or extended by further order, the Third Defendant and each of them are forbidden from entering, occupying or remaining on any part of Newcastle International Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Third and Fourth Claimants (or either of them).
2. This Order is subject to periodic review by the Court on application by the Third and Fourth Claimants at intervals not exceeding 12 months and if such review does not take place the Order expires at 4pm on the anniversary of this Order.

SERVICE

3. Pursuant to CPR 6.15, 6.27, and r. 81.4(2)(c) and (d), the Third and Fourth Claimants shall take the following steps by way of service of copies of the Claim Form, the Application, and Witness Statements with their exhibits (“**the Claim Documents**”) and this Order upon the Third Defendant:
 - a. Uploading a copy onto the following website:
<https://www.newcastleairport.com/about-your-airport/airport-company/injunction/>
 - b. Sending an email with this Order attached to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above.
 - c. Affixing a notice at those locations marked with an “X” on Plan 3 setting out where these documents can be found and obtained in hard copy in the form of Schedule 4.
4. Within 2 working days of receipt of the sealed Order, it shall be provided to Reuters so that it can be used by press organisations to publicise its existence.
5. The taking of such steps set out at paragraph 3 shall be good and sufficient service of this Order and of the Claim Documents upon the Third Defendant and each of them.
6. The Court will provide sealed copies of this Order to the Third and Fourth Claimants’ solicitors for service (whose details are set out below).

7. The deemed date of service of the Claim Documents shall be the date shown on the relevant certificate of service on completion of the steps described at paragraph 3. The step described at paragraph 3(c) will be completed when those notices are first affixed.
8. The deemed date of service of this Order shall be the date shown on the relevant certificate of service on completion of the steps described at paragraphs 3. The step described at paragraphs 3(c) will be completed when those notices are first affixed.

FURTHER DIRECTIONS

9. Service on the Third Defendant of any further applications or documents in the proceedings by the Third and Fourth Claimants shall be effected by carrying out each of the steps in paragraph 3.
10. Anyone may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Third and Fourth Claimants' solicitors 72 hours' notice of such application by email to StuartWortley@eversheds-sutherland.com. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing or by email to the Third and Fourth Claimants' solicitors at least 48 hours in advance of any hearing.
11. Roger Hallam, Phoebe Plummer and/or Indigo Rumbelow shall be notified by being sent a link to the Claim Documents and this Order by email addressed to them at the addresses in Schedule 3 to this Order as soon as practicable.
12. Any person applying to vary or discharge this Order must provide their full name, address and address for service to the Third and Fourth Claimants' solicitors.
13. The Third and Fourth Claimants (or either of them) have liberty to apply to vary, extend or discharge this Order or for further directions.
14. No acknowledgment of service, admission or defence is required by any party until further so ordered.
15. Costs are reserved.

Ritchie J

Made 19.7.2024

COMMUNICATIONS WITH THE THIRD AND FOURTH CLAIMANTS

The Third and Fourth Claimants' solicitors and their contact details are:

(1) Stuart Wortley
Eversheds Sutherland (International) LLP
StuartWortley@eversheds-sutherland.com
07712 881 393

(2) Nawaaz Allybokus
Eversheds Sutherland (International) LLP
NawaazAllybokus@eversheds-sutherland.com
07920 590 944

(3) Alexander Wright
Eversheds Sutherland (International) LLP
alexwright@eversheds-sutherland.com
07500 578620

SCHEDULE 1

**SCHEDULE 2 - UNDERTAKINGS GIVEN BY THE THIRD AND FOURTH
CLAIMANTS**

- (1) The Third and Fourth Claimants will take steps to serve the Third Defendant with a note of the hearing which took place on 18 July 2024 by 1 August 2024.

- (2) The Third and Fourth Claimants will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss.

SCHEDULE 3 – EMAIL ADDRESSES

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org
- enquiries@extinctionrebellion.co.uk

SCHEDULE 4 – WARNING NOTICE

High Court Injunction in Force**NOTICE OF HIGH COURT ORDER DATED 18 JULY 2024 ("the Order")**

TO: PERSONS UNKNOWN WHOSE PURPOSE IS OR INCLUDES PROTESTING ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THE PREMISES AT NEWCASTLE INTERNATIONAL AIRPORT SHOWN EDGED RED ON PLAN 3 TO THE CLAIM FORM (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) AND WHO ENTER UPON THOSE PREMISES; AND PERSONS UNKNOWN WHO PROTEST ABOUT FOSSIL FUELS OR THE ENVIRONMENT ON THOSE PREMISES (WHETHER IN CONNECTION WITH THE JUST STOP OIL CAMPAIGN OR EXTINCTION REBELLION CAMPAIGN OR OTHERWISE) (the "**Defendants**")

FROM: Newcastle International Airport Limited and NIAL Services Limited (the "**Third and Fourth Claimants**")

This notice relates to the land known as Newcastle International Airport which is shown edged red on the Plan below (the "**Airport**")

The Order prohibits entering, occupying or remaining upon any part of the Airport for the purpose of protesting about fossil fuels or the environment without the prior consent of the Third and Fourth Claimants.

You must not do any of the above acts either yourself or by means of another person acting on your behalf, instructions or encouragement.

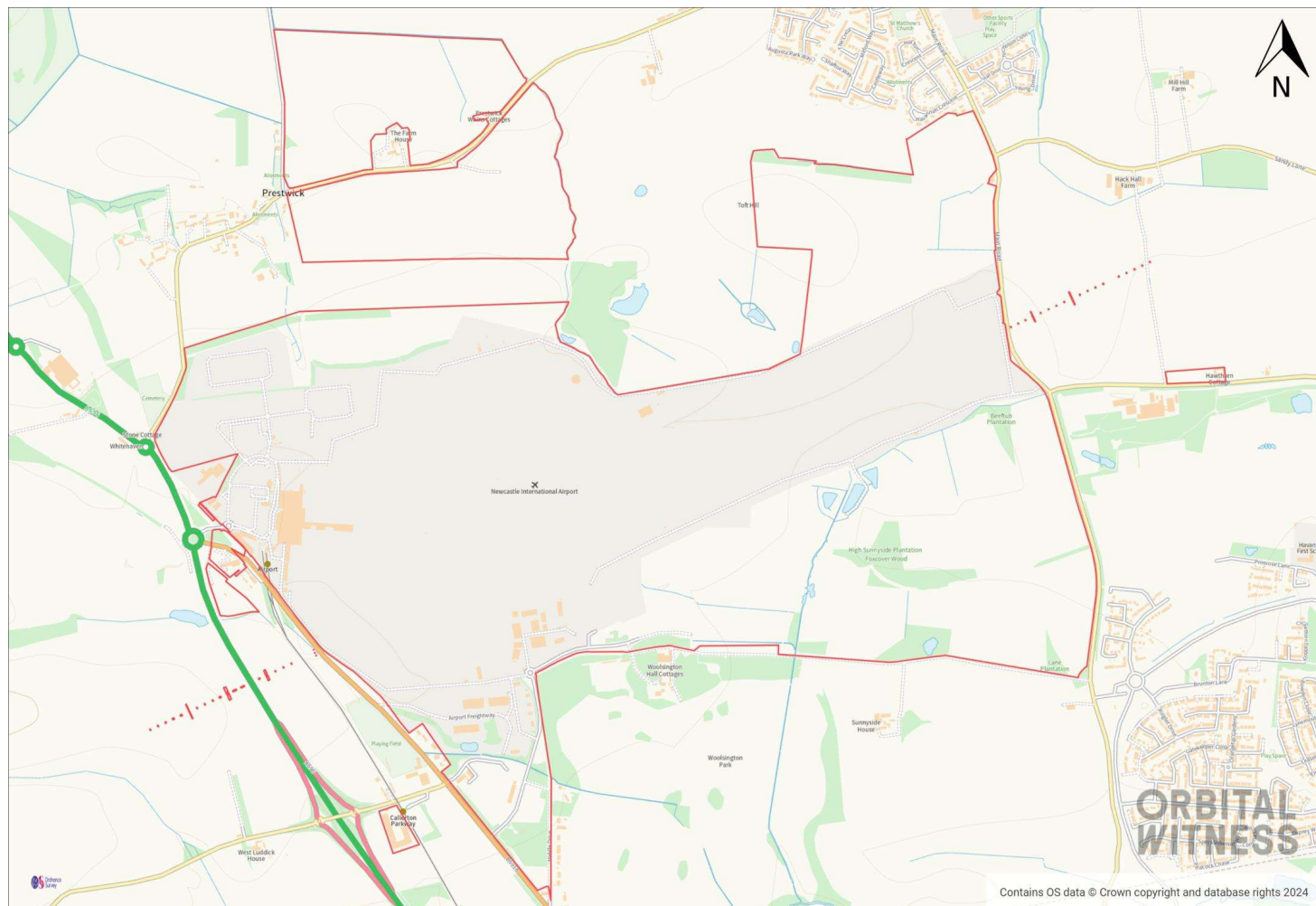
You must not contravene the terms of the Order and if you do, you may be in contempt of Court and sent to prison, fined or have your assets seized

Any person affected by the Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Third and Fourth Claimants' solicitors by email to the address specified below 72 hours before making such application of the nature of such application and the basis for it.

The Order, copies of the Claim Documents which relate to the Order and a note of the hearing on 18 July 2024 may be viewed at:

<https://www.newcastleairport.com/about-your-airport/airport-company/injunction/>

Copies may also be obtained from the Information Desk or by contacting Stuart Wortley of Eversheds Sutherland on 0771 288 1393 or by email stuartwortley@eversheds-sutherland.com.



On behalf of: the Claimant
By: Sean Foster Martell
No: 3
Exhibit: SFM4

Date: 25 July 2024

QB-2021-003576

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

BETWEEN:

NATIONAL HIGHWAYS LIMITED

Claimant

- and -


**PERSONS UNKNOWN CAUSING THE BLOCKING OF, ENDANGERING, OR
PREVENTING THE FREE FLOW OF TRAFFIC ON THE M25 MOTORWAY,
A2 A20 AND A2070 TRUNK ROADS AND M2 AND M20 MOTORWAY, A1(M),
A3, A1081, A12, A120, A13, A21, A23, A30, A414 AND A3113 TRUNK ROADS
AND THE M1, M3, M4, M4 SPUR, M11, M26, M23 AND M40 MOTORWAYS
FOR THE PURPOSE OF PROTESTING**

Defendants

EXHIBIT SFM4

This is the exhibit marked SFM4 referred to in the witness statement of SEAN FOSTER MARTELL dated this 25 day of July 2024.

Signed



From: Luxford, Steve CL999 <Steven.luxford@sussex.police.uk>
Sent: Thursday, July 18, 2024 11:27 AM
To: Lucy Tangen <Lucy.Tangen@nationalhighways.co.uk>
Cc: Petra Billing <Petra.Billing@dlapiper.com>; Robert Shaw <Rob.Shaw@dlapiper.com>
Subject: Protest Activity at Airports - Summer 2024

****EXTERNAL****

Dear Lucy

As you will be aware from media reporting and open-source information to date 5 Airports in the UK have High Court Injunctions against persons unknown. These airports are London Heathrow, London City, London Stansted, Manchester, and East Midlands.

In addition, I am advised that London Gatwick, London Luton, Leeds Bradford, and Newcastle are all in the process of applying for similar Injunctions. The intelligence picture is fairly limited in terms of actual planned activity. As you will be aware, Just Stop Oil have made it clear that the Airports across the country will be the target for their "campaign of non-cooperation" as set out in their letter 13th June however I am not aware of anything that sets out their plan as to what they intend to do, where and when or any views on whether the roads supplying airports are within their plans. An open letter to the Prime Minister on 16th July stated, "we remain in civil resistance and will take action at airports this summer" This was dated after all the current injunctions had been granted.

Of note, another protest organisation, Fossil Free London, had proposed a protest at London City Airport on 27th July 2024. Open-Source intelligence indicates that they have moved this to a central London location as a direct result of the injunction being in place.

The road network supporting Airports across the UK has been the location of protest previously (Gatwick South Terminal Roundabout 29 August 2020, Heathrow 5th June 2018) Indeed, Airports internationally have suffered through protest disruption to the supporting road network for instance in 2023 several airports across the US were disrupted due to protestors blocking the access roads. Whilst there is no current intelligence to indicate it being a tactic in consideration, protest on roads leading to Airports could be as disruptive by stopping passengers, crew and supplies reaching aircraft. The injunctions dissuading activism at Airports could push it to the surrounding road network.

Regards

Steve



Steve Luxford
Detective Sergeant
Chair UK Aviation Intelligence Forum
Lead Officer AIRPOL Intelligence
Gatwick Operations Intelligence
Gatwick Police Station
Perimeter Road North
Gatwick
West Sussex
RH6 0JE
Tel No: 01273 017171
Mobile: 07979 854519
steven.luxford@sussex.police.uk

You can report crime and incidents online at

<https://www.sussex.police.uk/report-online>

We want to know your views - see what's new and give us your feedback and suggestions at
www.sussex.police.uk

If you have received this message in error, please contact the sender as soon as possible - you may not copy it, or make use of any information contained in it for any purpose, or disclose its contents to any other person. Messages sent and received by Sussex Police are not private and may be the subject of monitoring.

On behalf of: the Claimant
By: Sean Foster Martell
No: 3
Exhibit: SFM5

Date: 25 July 2024

QB-2021-003576

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

BETWEEN:

NATIONAL HIGHWAYS LIMITED

Claimant

- and -

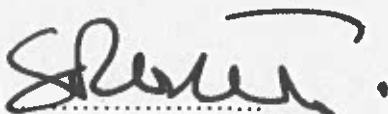
**PERSONS UNKNOWN CAUSING THE BLOCKING OF, ENDANGERING, OR
PREVENTING THE FREE FLOW OF TRAFFIC ON THE M25 MOTORWAY,
A2 A20 AND A2070 TRUNK ROADS AND M2 AND M20 MOTORWAY, A1(M),
A3, A1081, A12, A120, A13, A21, A23, A30, A414 AND A3113 TRUNK ROADS
AND THE M1, M3, M4, M4 SPUR, M11, M26, M23 AND M40 MOTORWAYS
FOR THE PURPOSE OF PROTESTING**

Defendants

EXHIBIT SFM5

This is the exhibit marked SFM5 referred to in the witness statement of SEAN FOSTER MARTELL dated this 25 day of July 2024.

Signed



From: Mark Williams <Mark.Williams@npocc.police.uk>

Sent: Tuesday, July 23, 2024 10:08 AM

To: Petra Billing <Petra.Billing@dlapiper.com>; Luxford, Steve CL999 <Steven.luxford@sussex.police.uk>

Cc: Lucy Tangen (lucy.tangen@nationalhighways.co.uk) <lucy.tangen@nationalhighways.co.uk>; Tony Nwanodi (tony.nwanodi@governmentlegal.gov.uk) <tony.nwanodi@governmentlegal.gov.uk>; Robert Shaw <Rob.Shaw@dlapiper.com>; John Litton KC <jlitton@landmarkchambers.co.uk>; Michael Feeney <Michael.Feeney@ftbchambers.co.uk>; Matt Lawler <Matt.Lawler@npocc.police.uk>; Darren.Mercer@met.police.uk

Subject: RE: VERY URGENT - Protest Activity at Airports - Summer 2024

****EXTERNAL****

Petra – my apologies for the tardy reply.

Yes, you can we can append my email to a witness statement in the event that you are instructed to apply to vary the SE injunction to cover the gaps between the M25 and the airports to the extent NH own/ control the roads.

I am also happy to expressly confirm that the police would consent to the disclosure order applying to the gaps between the M25 and the airports to the extent NH own/ control the roads. I am happy this e-mail be appended to any witness statement if you are instructed to apply for a variation.

Regards

Mark

ACC Mark Williams

National Mobilisation Coordinator and NPCC Civil Contingencies Lead

Tel: 07775020281

Email: mark.williams@npocc.police.uk



From: Petra Billing <Petra.Billing@dlapiper.com>

Sent: Friday, July 19, 2024 1:57 PM

To: Luxford, Steve CL999 <Steven.luxford@sussex.police.uk>; Mark Williams <Mark.Williams@npocc.police.uk>

Cc: Lucy Tangen (lucy.tangen@nationalhighways.co.uk) <lucy.tangen@nationalhighways.co.uk>; Tony Nwanodi (tony.nwanodi@governmentlegal.gov.uk) <tony.nwanodi@governmentlegal.gov.uk>; Robert Shaw <Rob.Shaw@dlapiper.com>; John Litton KC <jlitton@landmarkchambers.co.uk>; Michael Feeney

<Michael.Feeney@ftbchambers.co.uk>

Subject: VERY URGENT - Protest Activity at Airports - Summer 2024

Steve/ Mark

Can I just double check we can append your email to a witness statement in the event that we are instructed to apply to vary the SE injunction to cover the gaps between the M25 and the airports to the extent NH own/ control the roads?

Mark we do not intend to seek any variation to the third party police disclosure order at paras 12 - 14 attached. Could you however please expressly confirm that the police would consent to the disclosure order applying to the gaps between the M25 and the airports to the extent NH own/ control the roads? Your email giving consent would also be appended to any witness statement if we are instructed to apply for a variation.

Could each of you separately respond please by separate email?

Thanks as always

Petra Billing

Partner & UK Head of
Real Estate Litigation

T: +442077966047

F: +441142724941

M: +447968558801

petra.billing@dlapiper.com

DLA Piper UK LLP

www.dlapiper.com



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STAND-OUT LAWYER 2023

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

**Before: Mrs Justice Collins Rice
On: 26 April 2024**

BETWEEN:



NATIONAL HIGHWAYS LIMITED

Claimant

- and -

**(1) PERSONS UNKNOWN CAUSING THE BLOCKING OF, ENDANGERING,
OR PREVENTING THE FREE FLOW OF TRAFFIC ON THE M25
MOTORWAY, A2 A20 AND A2070 TRUNK ROADS AND M2 AND M20
MOTORWAY, A1(M), A3, A12, A13, A21, A23, A30, A414 AND A3113 TRUNK
ROADS AND THE M1, M3, M4, M4 SPUR, M11, M26, M23 AND M40
MOTORWAYS FOR THE PURPOSE OF PROTESTING
(2) MX CATHERINE RENNIE - NASH AND 10 OTHERS**

Defendants

ORDER

PENAL NOTICE

**IF YOU THE WITHIN NAMED DEFENDANTS OR ANY OF YOU DISOBEY THIS ORDER
YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED,
FINED OR HAVE YOUR 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.**

A Defendant who is an individual who is ordered not to do something must not do it himself/herself/themselves or in any other way. He/she/they must not do it through others acting on his/her/their behalf or on his/her/their instructions or with his/her/their encouragement.

FURTHER TO the Order made by Mr Justice Cotter dated 5 May 2023 (“**Original Cotter Order**”) (as amended by Mr Justice Cotter by further Orders dated 24 July 2023 (“**July 2023 Order**”) and 3 October 2023 (“**October 2023 Order**”) (“**Consequential Orders**”) together “**Cotter Injunction**”)

AND UPON the Claimant’s application by Application Notice dated 27 March 2024

AND UPON Mrs Justice Collins Rice reading the judgment of Mr Justice Cotter in National Highways Limited v Persons Unknown [2023] EWHC 1073 (KB), the Second Witness Statement and exhibit of Sean Martell dated 26 March 2024 and the Witness Statement and exhibit of Petra Billing dated 18 April 2024

AND UPON the Court noting the basis on which the Cotter Injunction was granted, and reviewing whether there remains a continued threat which justifies the continuation of the injunction

AND UPON the Court being satisfied that based on the evidence before the Court that there was a continued threat such that the Cotter Injunction should be continued

AND UPON the Claimant re-confirming that this Order is not intended to prohibit lawful protest which does not block or endanger, or prevent the free flow of traffic on the Roads defined in paragraph 1 of this Order

AND UPON the Police Representative Assistant Chief Constable Mark Williams (Assistant Chief Constable Owen Weatherill having retired) consenting to the Third-Party Disclosure provisions at paragraph 10 of this Order on behalf of all the Chief Constables for those forces listed in Schedule 2 to this Order, which consent has been evidenced to the Court

AND UPON HEARING Counsel for the Claimant (the Defendants not attending nor making any submissions in writing or otherwise) at a hearing on 26 April 2024.

IT IS ORDERED THAT:

Definitions

1. In this Order, the following defined terms shall apply:
 - a. “**Named Defendants**” means D14, D50, D52, D53, D54, D76, D93, D100, D101, D104, D136, whose names appear in Schedule 1 annexed to this Order.

- b. **“Defendants”** means all defendants.
- c. **“the Roads”** shall mean all of the following:
- i. The M25, meaning the London Orbital Motorway and shown in red on the plans at Appendix 1 annexed to this Order.
 - ii. The A2, A20, A2070, M2 and M20, meaning the roads shown in blue and green on the plans at Appendix 2 annexed to this Order.
 - iii. The A1(M) (Junction 1 to Junction 6), A1 (from A1M to Rowley Lane and from Fiveways Corner roundabout to Hilltop Gardens), M11 (Junction 4 to Junction 7), A12 (M25 Junction 28 to A12 Junction 12), A1023 (Brook Street) (from M25 Junction 28 roundabout to Brook Street Shell Petrol Station access), A13 (M25 Junction 30 to A1089), A13 (from junction with A1306 for Wennington to M25 Junction 30), A1089 (from junction with A13 to Port of Tilbury entrance), M26 (whole motorway from M25 to M20), A21 (M25 to B2042), A23 (M23 to Star Shaw), M23 (Junction 7 to Junction 10 (including M23 Gatwick Spur)), A23 (between North and South Terminal Roundabouts), A3 (A309 to B2039 Ripley Junction), M3 (Junction 1 to Junction 4), A316 (from M3 Junction 1 to Felthamhill Brook), A30 (M25 Junction 13 to Harrow Road, Stanwell, Feltham), A3113 (M25 Junction 14 to A3044), M4 (Junction 1 to Junction 7), M4 Spur (whole of spur from M4 Junction 4 to M4 Junction 4a), M40 (Junction 7 to A40 at Fray’s River Bridge), M1 (Junction 1 to Junction 8), A405 (from M25 Junction 21A to M1 Junction 6), A1 (from Fiveways Corner roundabout to Hilltop Gardens), and A414 (M1 Junction 8 to A405), meaning the roads shown in red on the plan at Appendix 3 annexed to this Order.
 - iv. In the case of each of the Roads, the reference to the Roads shall include all carriageways, hard shoulders, central reservations, motorway (including the A1(M)) verges, slip roads, roundabouts (including those at junctions providing access to and from the Roads), gantries, traffic tunnels, traffic bridges including in the case of the M25 the Dartford Crossing and Queen Elizabeth II Bridge and other highway structures whether over, under or adjacent to the motorway/trunk road, together with all supporting infrastructure including all fences and barriers, road traffic signs, road traffic signals, road lighting,

communications installations, technology systems, laybys, police observation points/park up points, and emergency refuge areas.

- d. “**Injunction Website**” means the page on the National Highways website which holds the information as to injunctions in force, which is presently at: <https://nationalhighways.co.uk/about-us/high-court-injunctions-for-motorways-and-major-a-roads/>.

Variations/ Amendments

2. The Claimant has permission to amend the Schedule of Defendants in the form set out at Schedule 1. Those amendments are as follows:
 - a. Removal of all Named Defendants from the Cotter Injunction, namely: D14, D50, D52, D53, D54, D76, D93, D100, D101, D104, D136 such that there are now no Named Defendants to the Cotter Injunction
 - b. The substitution of the following revised wording to the Schedule of Defendants being a revision of paragraph 2(c) of the Cotter Injunction: “*For the avoidance of doubt, any person who has previously been a named defendant in these proceedings, in the Cotter Injunction, or who has given undertakings to the Court in these proceedings, may nevertheless become Defendant 1 as a person unknown if they commit any of the prohibited acts.*”

Injunction in force

3. With immediate effect and until 23.59 hrs on 10 May 2025 the Defendants and each of them are forbidden from:
 - a. Blocking or endangering, or preventing the free flow of traffic on the Roads for the purposes of protesting by any means including their presence on the Roads, or affixing themselves to the Roads or any object or person, abandoning any object, erecting any structure on the Roads or otherwise causing, assisting, facilitating or encouraging any of those matters.
 - b. Causing damage to the surface of or to any apparatus on or around the Roads including by painting, damaging by fire, or affixing any structure thereto.
 - c. Entering on foot those parts of the Roads which are not authorised for access on foot, other than in cases of emergency.

Service by Alternative Method on the First Defendant

4. The Court will provide sealed copies of this Order to the Claimant's solicitors for service (whose details are set out below).
5. Pursuant to CPR r. 6.15, 6.27 and r.81.4:
 - a. The Claimant shall serve this Order upon D1 by:
 - i. Posting a direct link to this Order on the National Highways Injunctions Website at: <https://nationalhighways.co.uk/about-us/high-court-injunctions-for-motorways-and-major-a-roads/m25-high-court-injunction-proceedings/>.
 - ii. Sending a notification of the existence of this Order to the Press Association and in particular advertising the web address of the Injunction Website and a direct link to this Order.
 - iii. Publishing social media posts on the National Highways Twitter and Facebook platforms advertising the existence of this Order and providing a link to the Injunction Website.
 - iv. Emailing a copy of this Order to:
 1. juststopoil@protonmail.com
 2. juststopoilpress@protonmail.com
 3. insulatebritainlegal@protonmail.com
 4. Ring2021@protonmail.com
 5. actions@animalrebellion.org
 6. fundraising@animalrebellion.org
 7. integration@animalrebellion.org
 8. talks@animalrebellion.org
 9. global@animalrebellion.org
 10. localgroups@animalrebellion.org
 11. media@animalrebellion.org
 12. governance@animalrebellion.org
 13. pressoffice@animalrebellion.org
 14. finance@animalrebellion.org
 15. techsupport@animalrebellion.org

16. info@animalrising.org

6. Service in accordance with paragraph 5 above shall:

- a. Be verified by certificates of service to be filed with the Court;
- b. Be deemed effective as at the date of service specified by the certificates of service;
- c. Be good and sufficient service of this Order on D1 and each of them and the need for personal service is dispensed with.

Service by Alternative Method on Named Defendants removed from the Cotter Injunction by paragraph 2(a) of this Order

7. The Claimant shall serve this Order on each Named Defendant in accordance with CPR r. 6.20. If the Claimant is not able to effect service on a Named Defendant in accordance with CPR r. 6.20 because it does not know the current address of a Named Defendant, then pursuant to CPR r. 6.15 and 6.27, the Claimant is permitted instead to serve this Order on each Named Defendant by:

- a. Placing this Order on the Injunction Website; and
- b. Social media: only in circumstances where the Claimant has no address, or no email address for a Named Defendant, but is aware of that Named Defendant having a social media account which will permit the Claimant to contact that Named Defendant directly, the Claimant may serve this Order by sending a message to that Named Defendant providing either this Order or a link to the Injunction Website.
- c. Where a Named Defendant is known by the Claimant to be in prison this Order shall be served by sending it by first class and/or special delivery post to the Named Defendant at the prison in which the Claimant reasonably considers they are being held.

8. Service in accordance with paragraph 7 above shall:

- a. be verified by certificates of service to be filed with Court;
- b. be deemed effective as at the date specified by the certificates of service; and
- c. be good and sufficient service of this Order on the Defendants and each of them and the need for personal service be dispensed with.

9. Further, without prejudice to paragraph 5, whilst this Order is in force, the Claimant shall take all reasonably practicable steps to effect personal service of the Order upon any Defendant of whom it becomes aware is, or has been, on the Roads for the purposes of protesting and shall verify any such service with further certificates of service (where possible if persons unknown can be identified) to be filed with Court.

Third-Party Disclosure

10. Pursuant to CPR 31.17, the Chief Constables for those forces listed in Schedule 2 to this Order shall procure that the officers within their forces disclose to the Claimant:
 - a. all of the names and addresses of any person who has been arrested by one of their officers in the course of, or as a result of, protests on the Roads referred to in these proceedings; and
 - b. all arrest notes, body camera footage and/or all other photographic material relating to possible breaches of this Order.
11. Without the permission of the Court, the Claimant shall not make use of any document disclosed by virtue of paragraph 10 of this Order, other than for one or more of the following uses:
 - a. applying to name and join any person as a Named Defendant to these proceedings and to serve the said person with any document in these proceedings;
 - b. investigating, formulating, pleading and prosecuting any claim within these proceedings arising out of any alleged breach of this Order;
 - c. use for purposes of formulating, pleading and prosecuting any application for committal for contempt of court against any person for breach of any Order made within these proceedings.
12. The Chief Constables listed in Schedule 2 to this Order shall procure that the officers within their forces give the relevant person whose details are to be provided to the Claimant pursuant to paragraph 10 of this Order not less than 48 hours' notice that disclosure will be given under paragraph 10 of this Order and supply a copy of this Order or refer to an e-mail address/website or phone number provided by the Claimant to enable this Order to be provided/available for consideration.

13. Until further Order, the postal address and/or address for service of any person who is added as a Named Defendant to these proceedings shall be redacted in any copy of any document which is served other than by means of it being sent directly to that person or their legal representative.
14. The Claimant is to serve this order on the Police Representative (Assistant Chief Constable Mark Williams (Mark.Williams@npocc.police.uk), by email only by way of service upon the Chief Constables of all of the forces listed in Schedule 2 to this Order.

Further Directions

15. Unless the Court is notified that no hearing is required (as no continuation of the Order is sought), the Order will be reconsidered at a hearing on Friday 25 April 2025 at 10.30 hrs at the Royal Courts of Justice, London to determine whether there is a continued threat which justifies continuation of this Order beyond 23.59 hrs on 10 May 2025 (“**Review Hearing**”). No further application by the Claimant shall be required.
16. The Claimant has liberty to apply for this Order to be reconsidered on the papers in order to avoid unnecessary expense and use of Court time:
 - a. The Claimant’s application for reconsideration on the papers must be made by 4pm on 28 March 2025.
 - b. The Claimant shall file any evidence and/or written submissions by 4pm on 28 March 2025. The Claimant shall place any document so filed on the Injunction Website, which shall constitute good service on the Defendants.
 - c. Any other party interested in the review of this Order shall file with the Court and serve on the Claimant (at the address in paragraph 21 below) any evidence and/or written submissions by 4pm on 4 April 2025.
 - d. The Claimant, if so advised, may file and serve upon the relevant party further evidence and/or written submissions in response by 4pm on 11 April 2025.
 - e. The Court shall determine whether the to proceed on the papers and so vacate the Review Hearing by 4pm on 16 April 2025.
17. The Defendants 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 inform the Claimant’s solicitors by email to the addresses specified at paragraph 21 below 48 hours before making such application of the nature of such application and the basis for it.

18. Any person applying to vary or discharge this Order must provide their full name and address, and address for service to the Claimant and to the Court and must also apply to be joined as a Named Defendant to these proceedings at the same time.
19. The Claimant has liberty to apply to extend, vary or discharge this Order, or for further directions.

Costs

20. No order as to costs.

Communications with the Claimant

21. The Claimant's solicitors and their contact details are:

DLA Piper UK LLP

Attention: National Highways Injunction Team (Ref: PXB/RXS/439241/15)

1 St. Paul's Place

Sheffield

S1 2JX

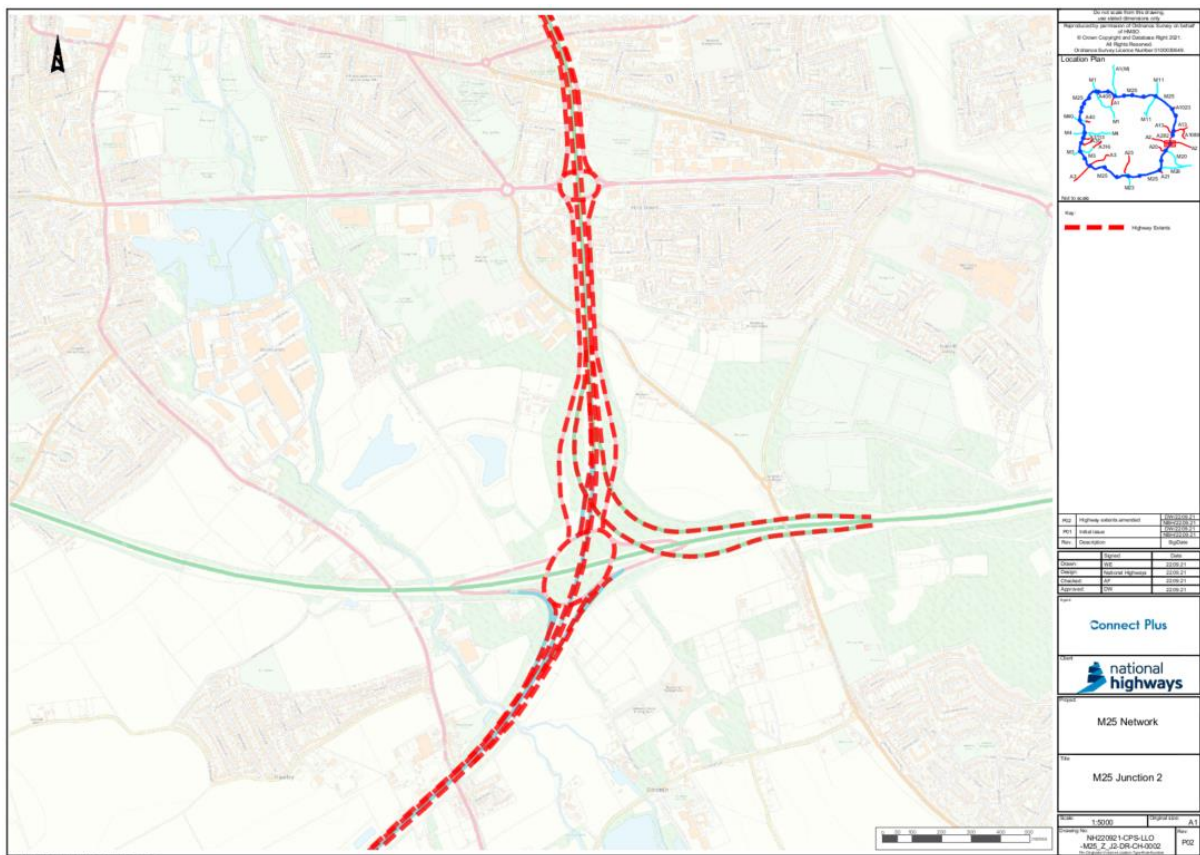
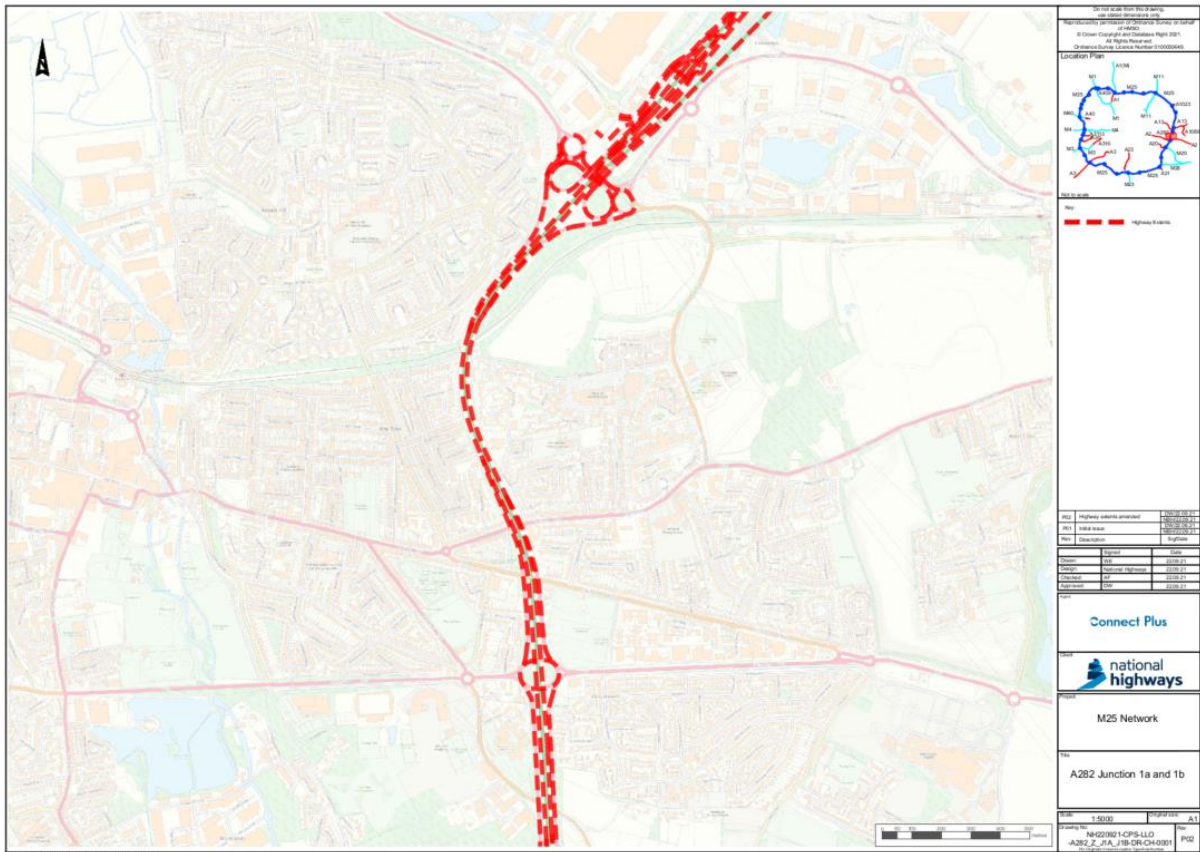
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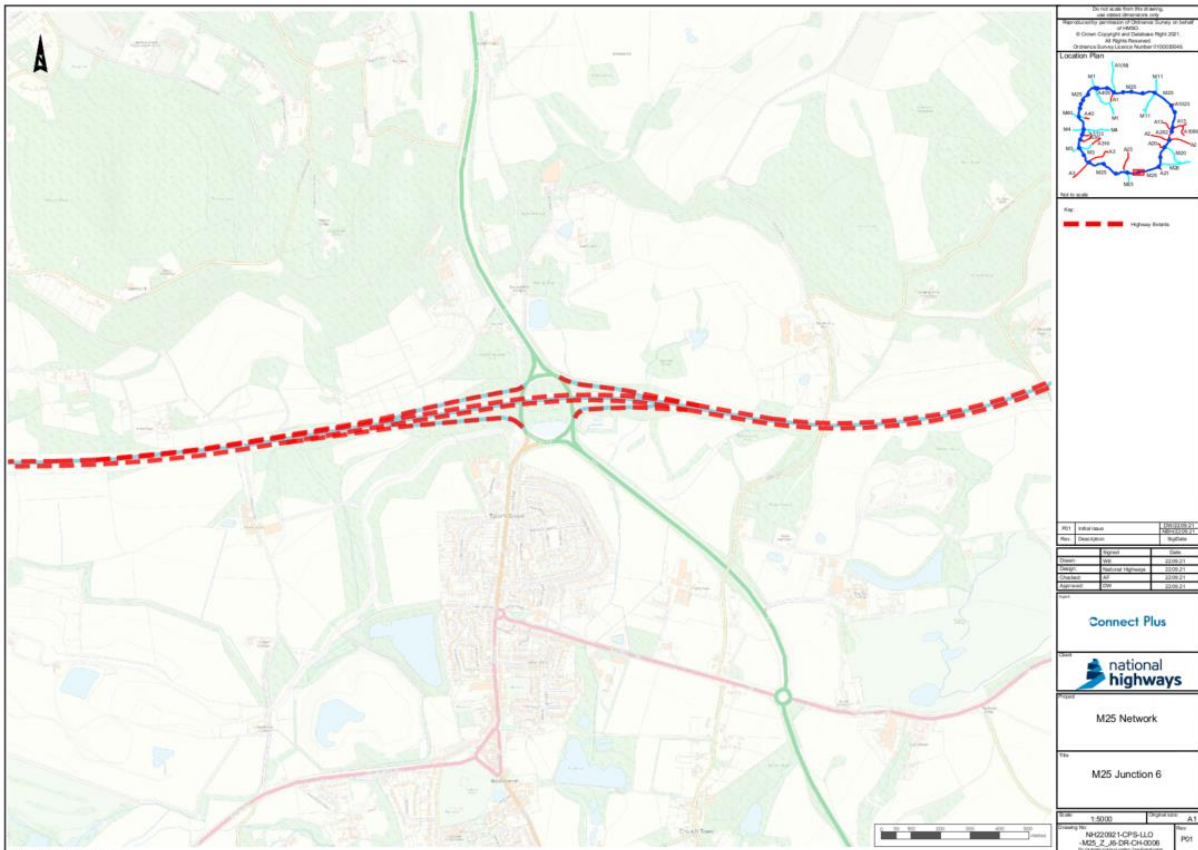
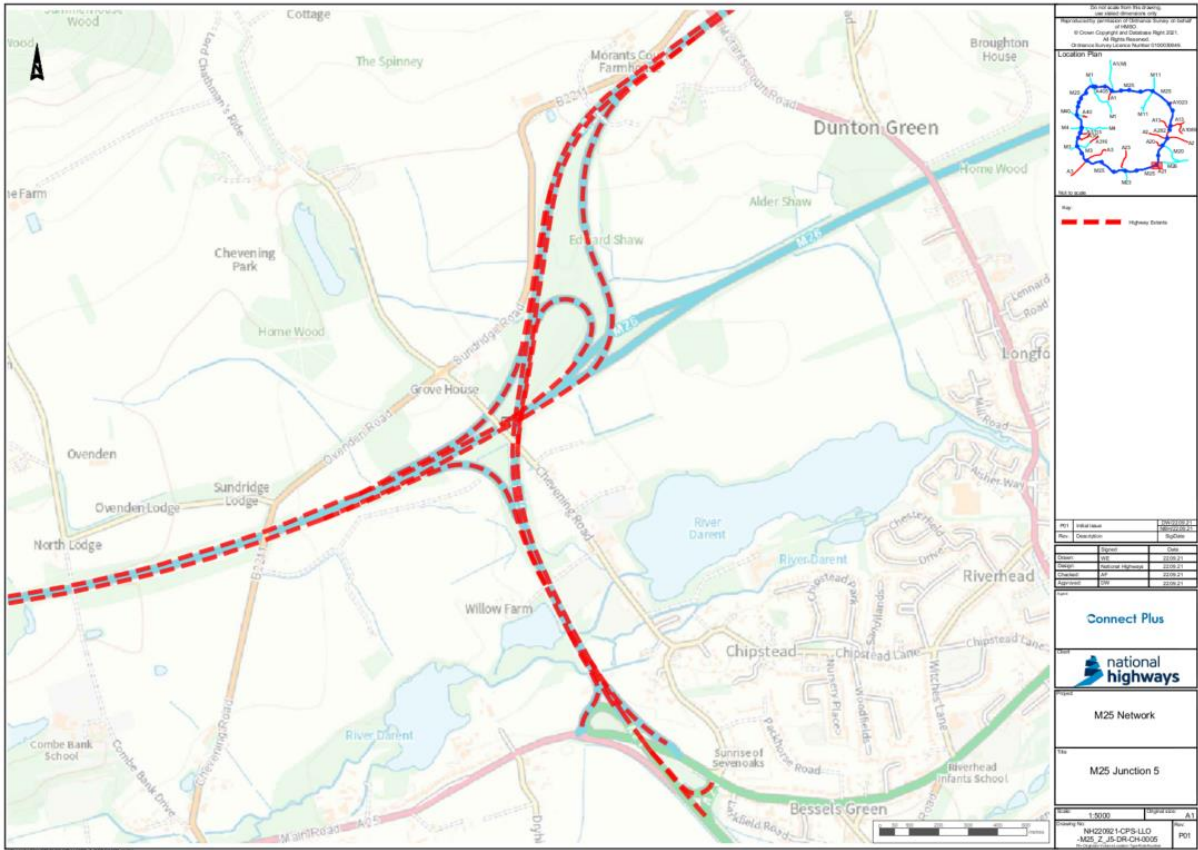
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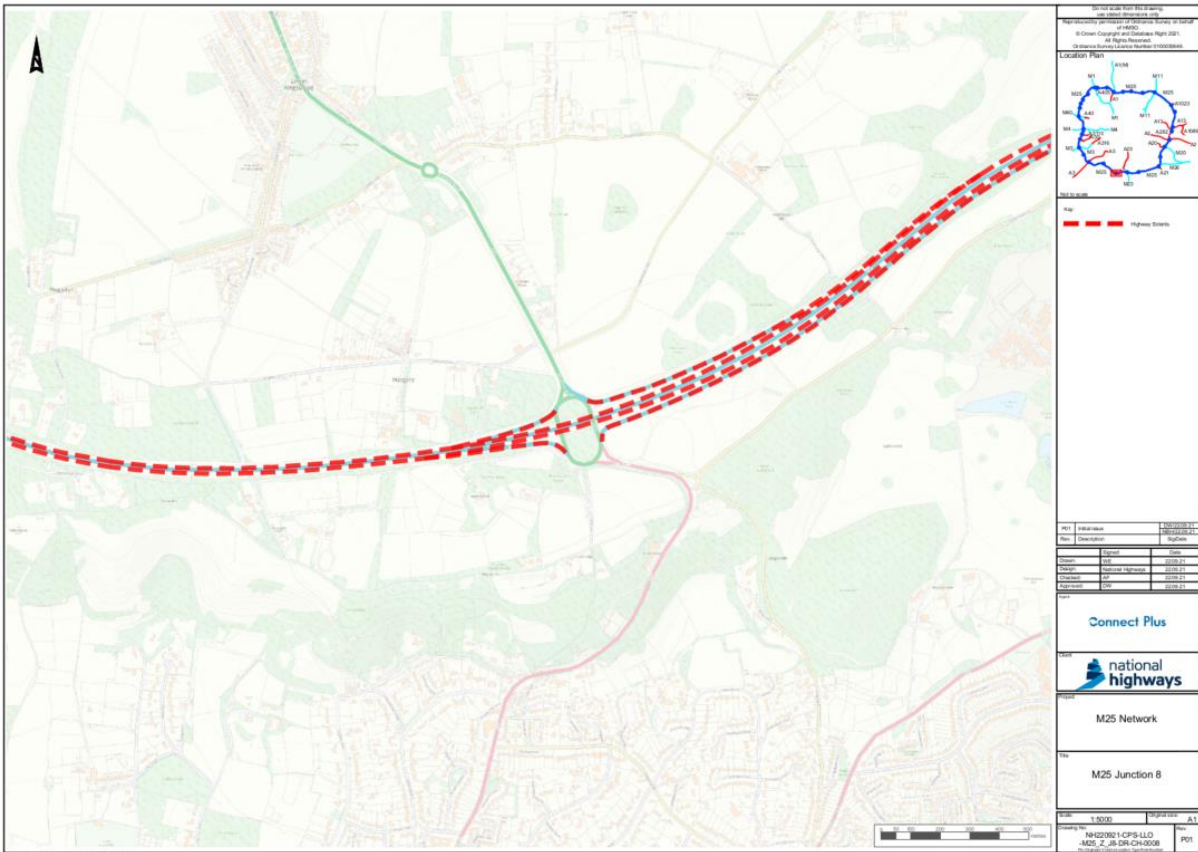
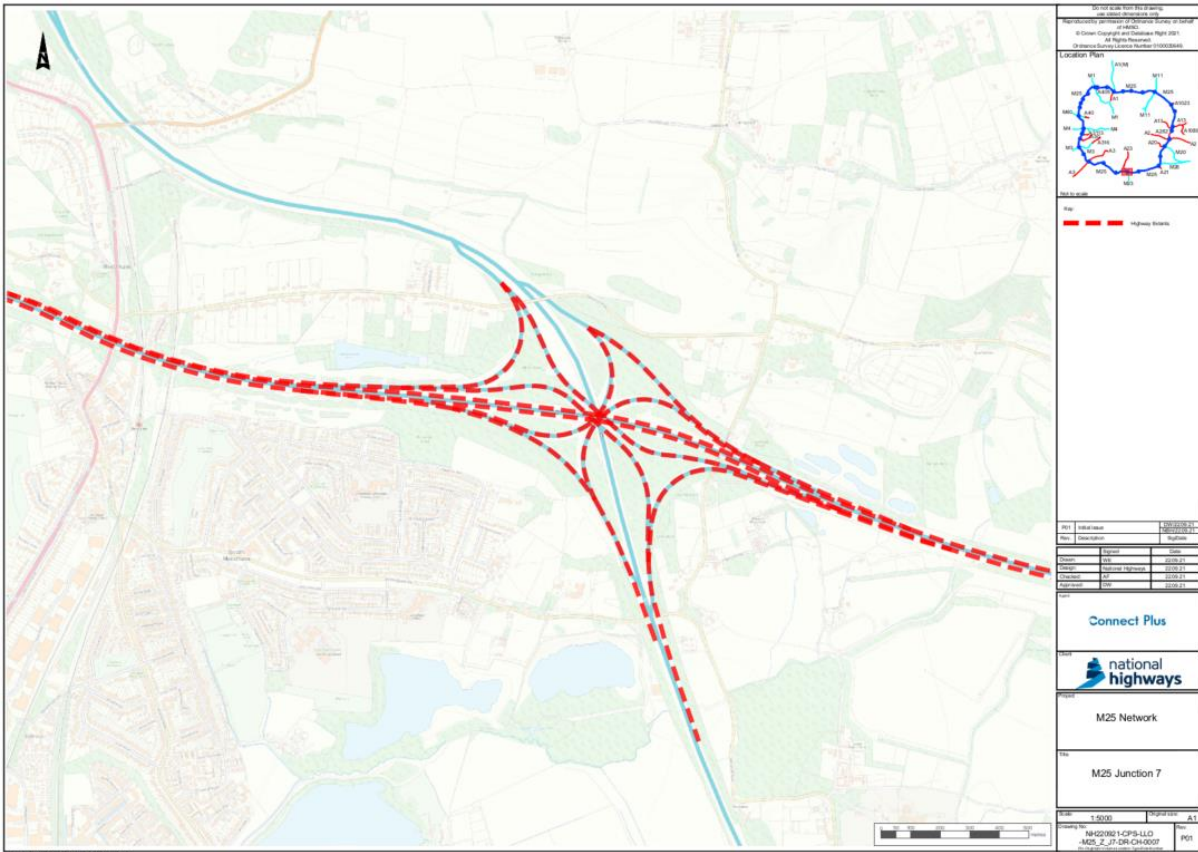
BY THE COURT

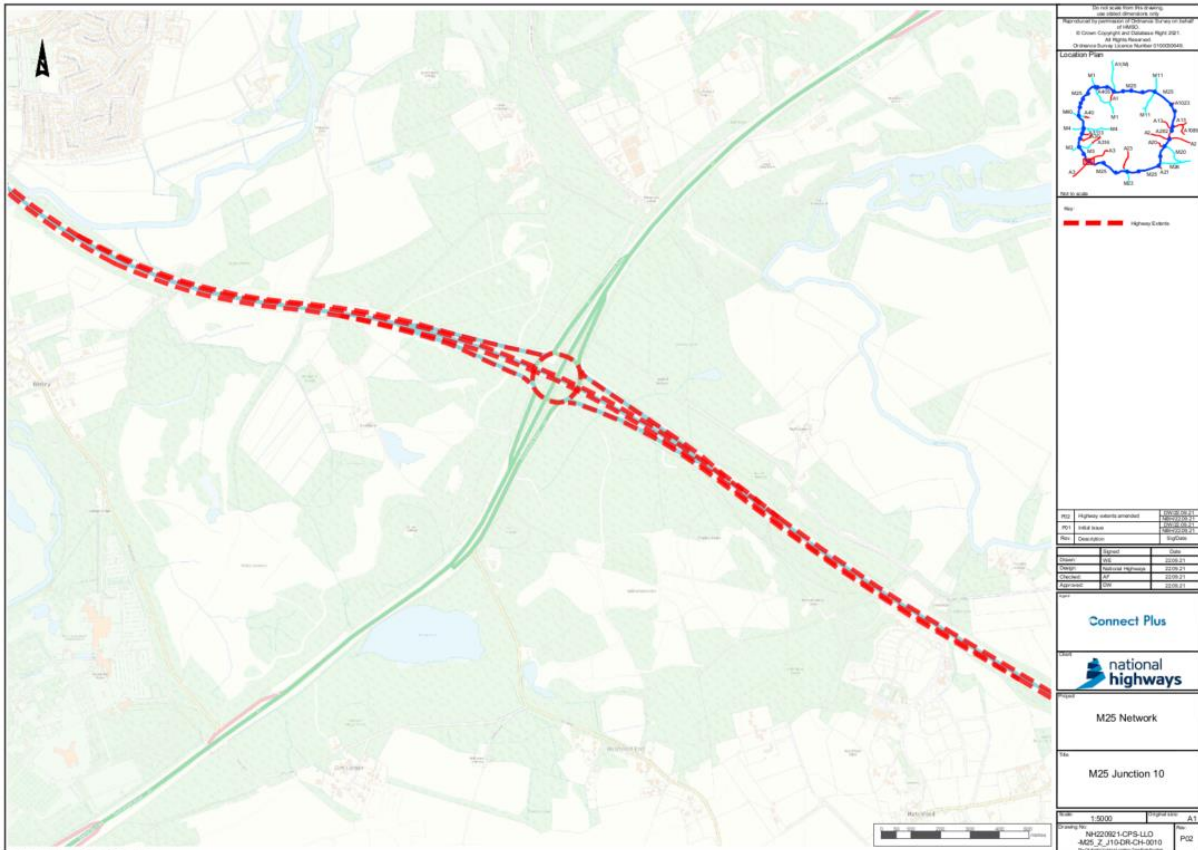
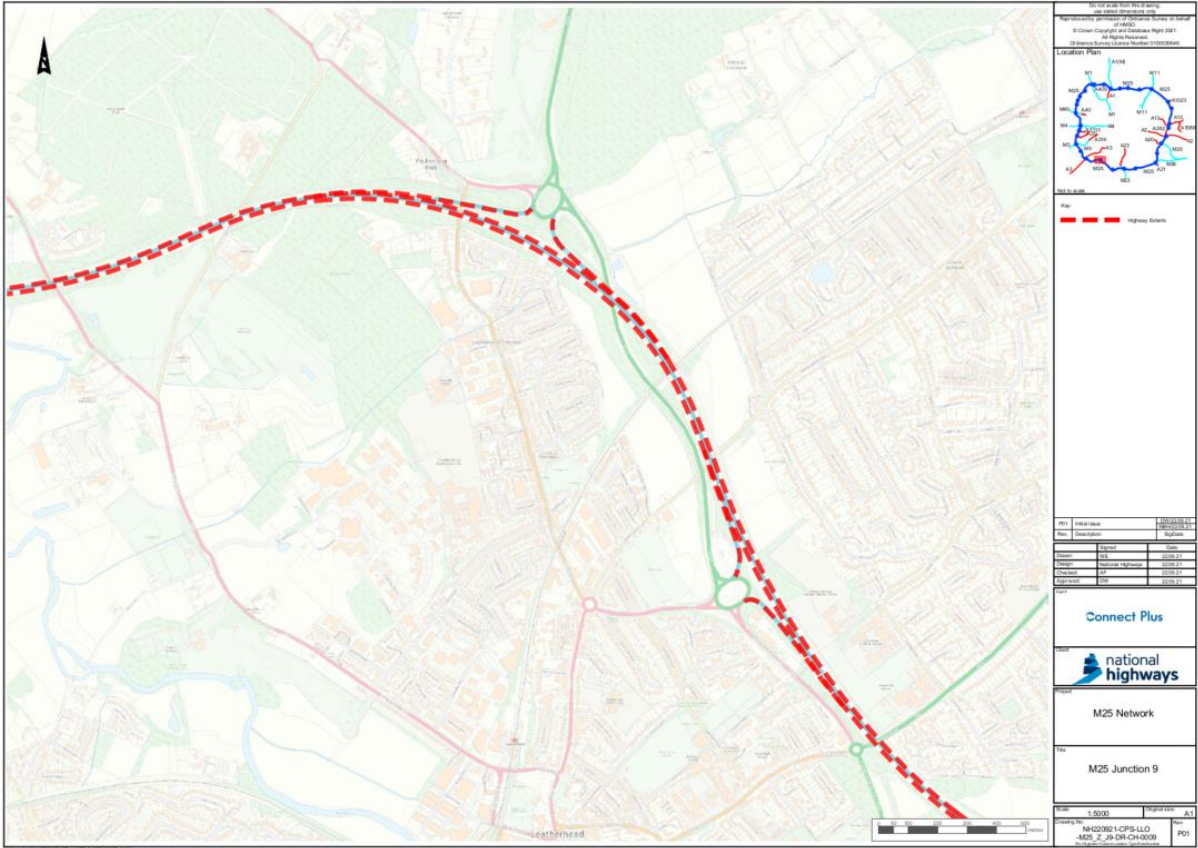
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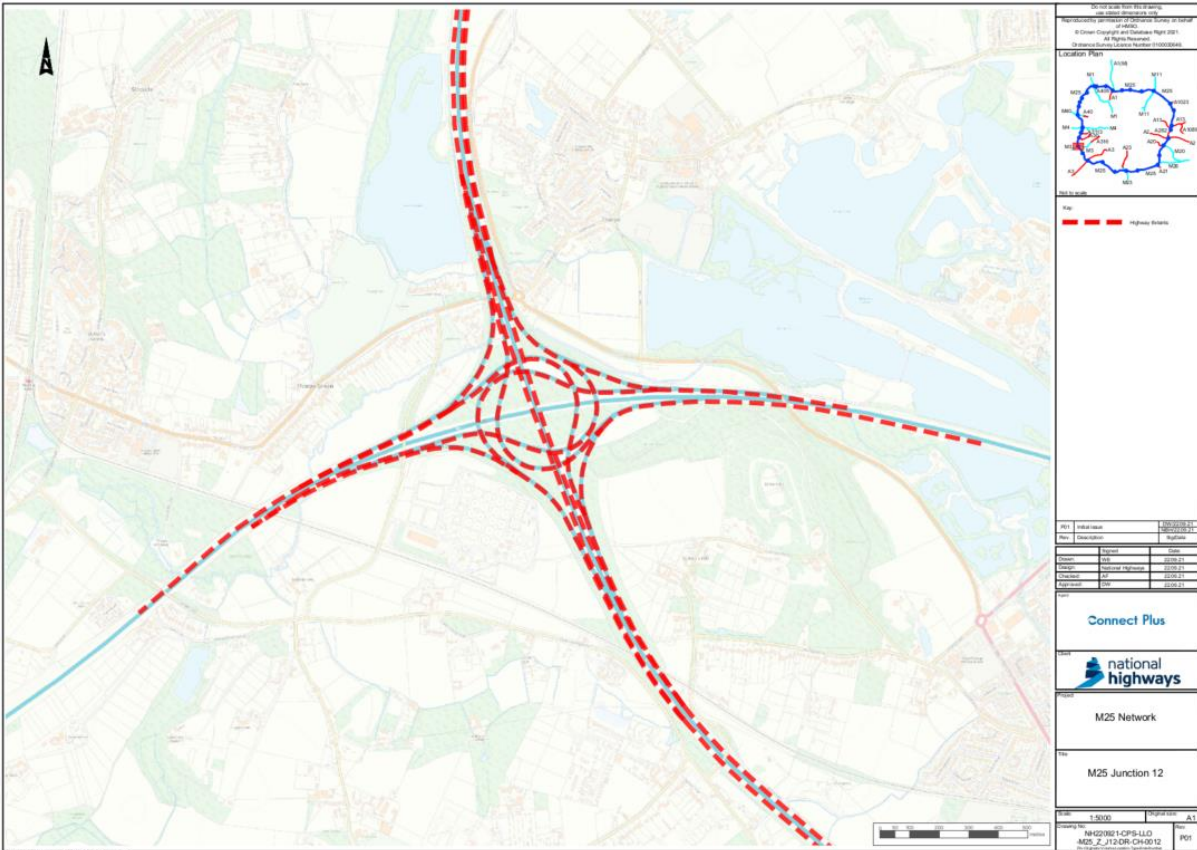
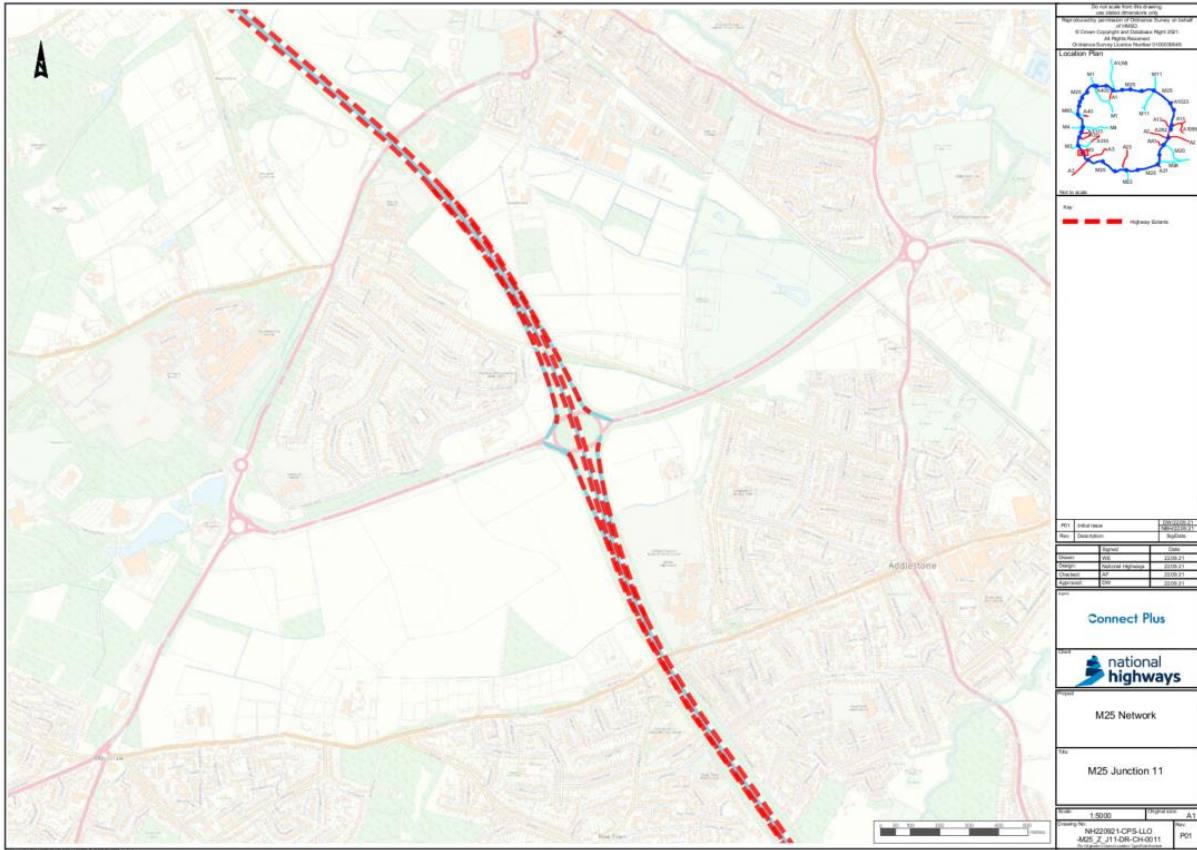
APPENDIX 1



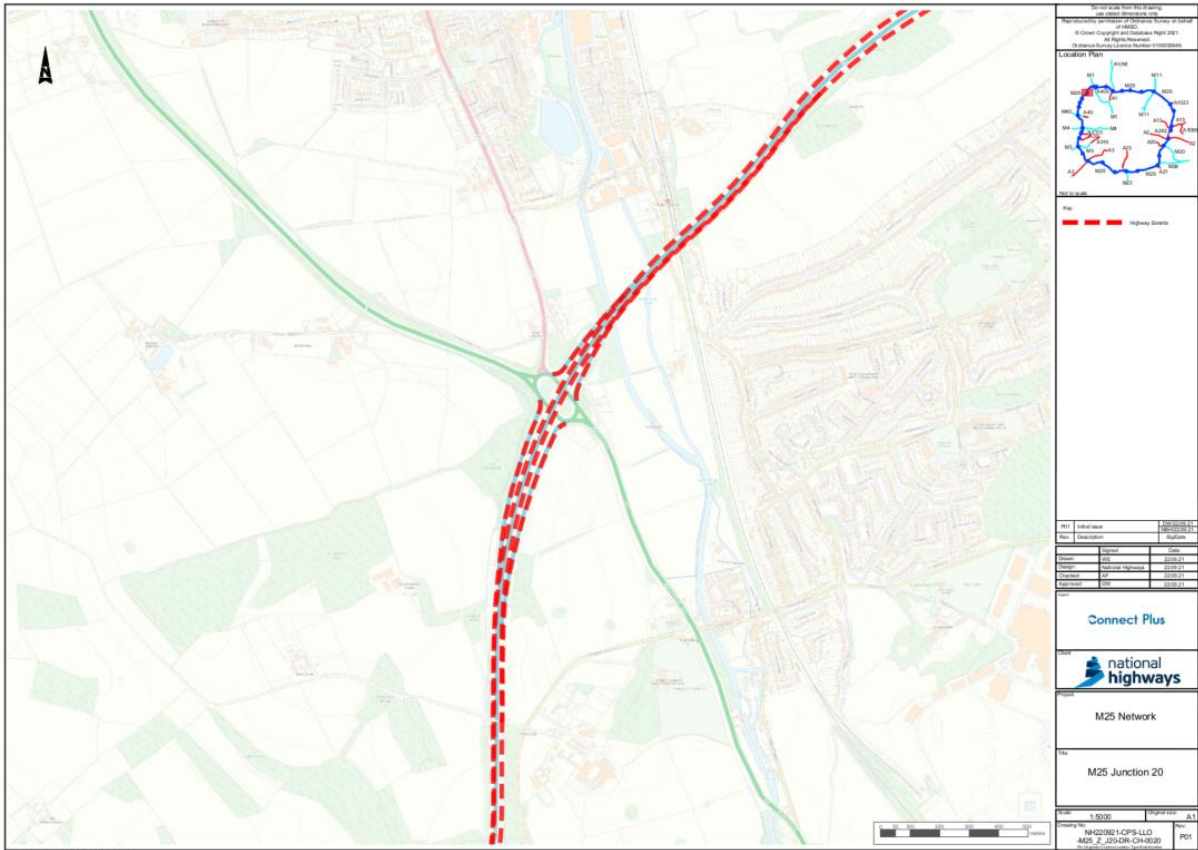
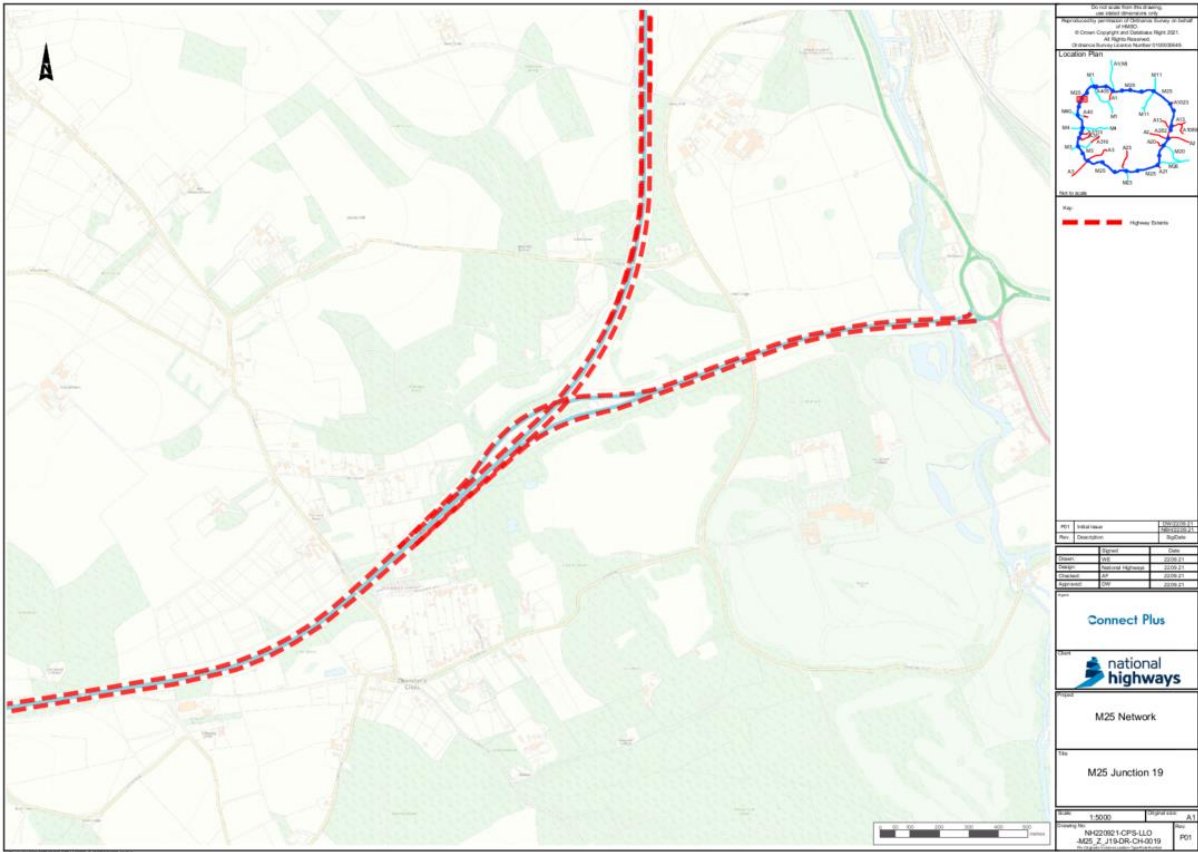


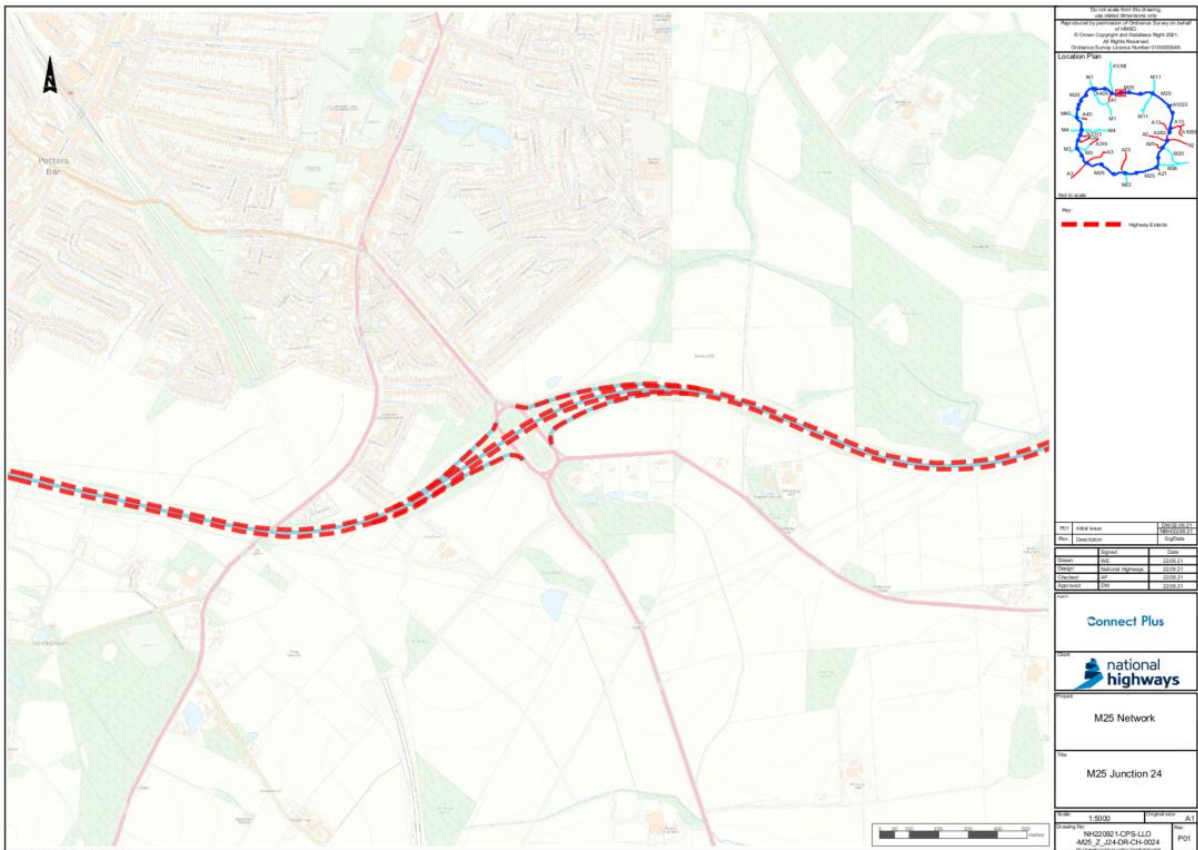
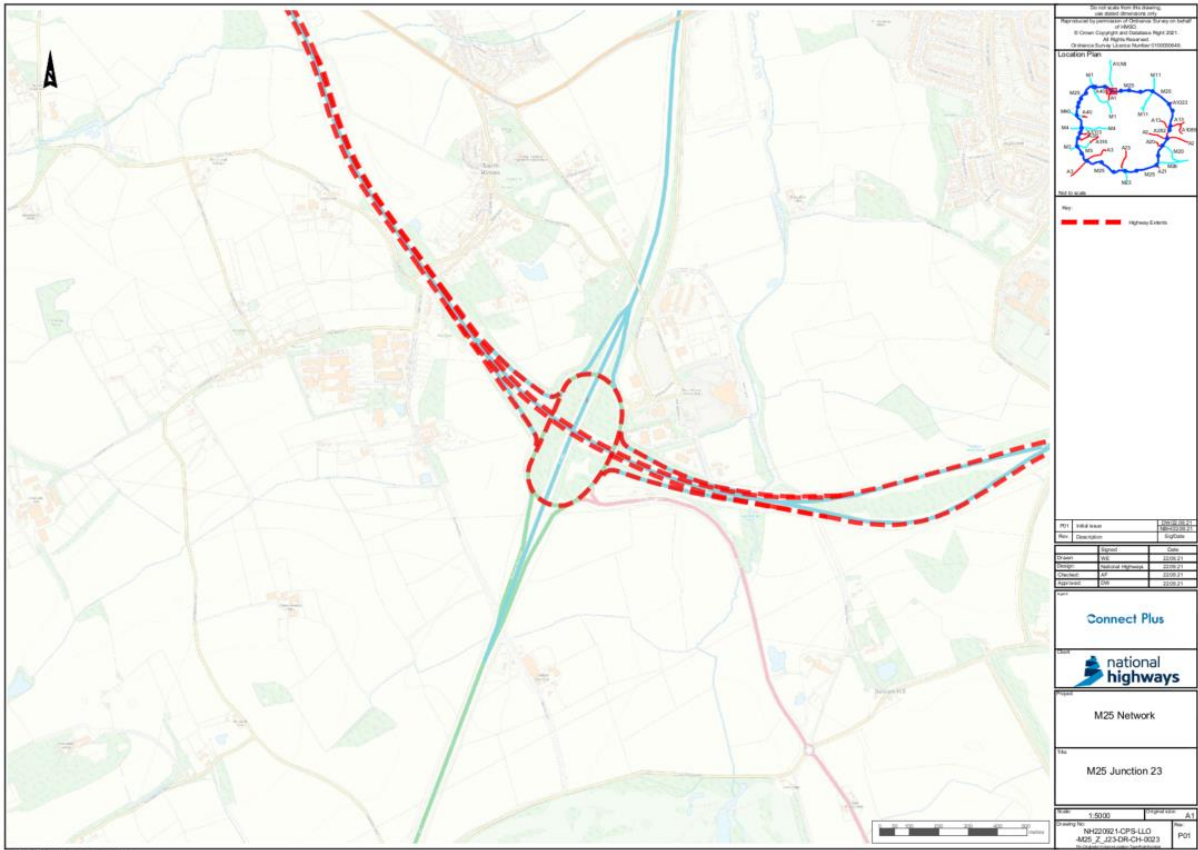


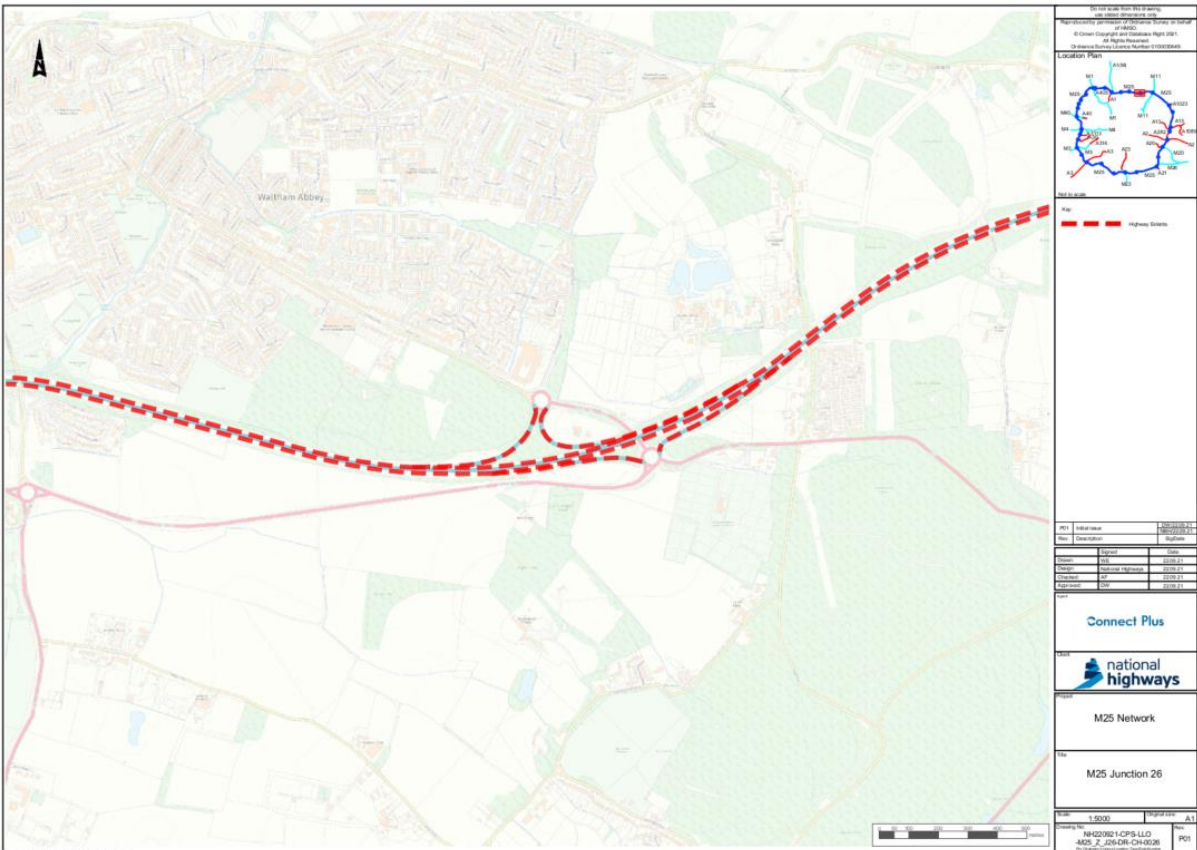
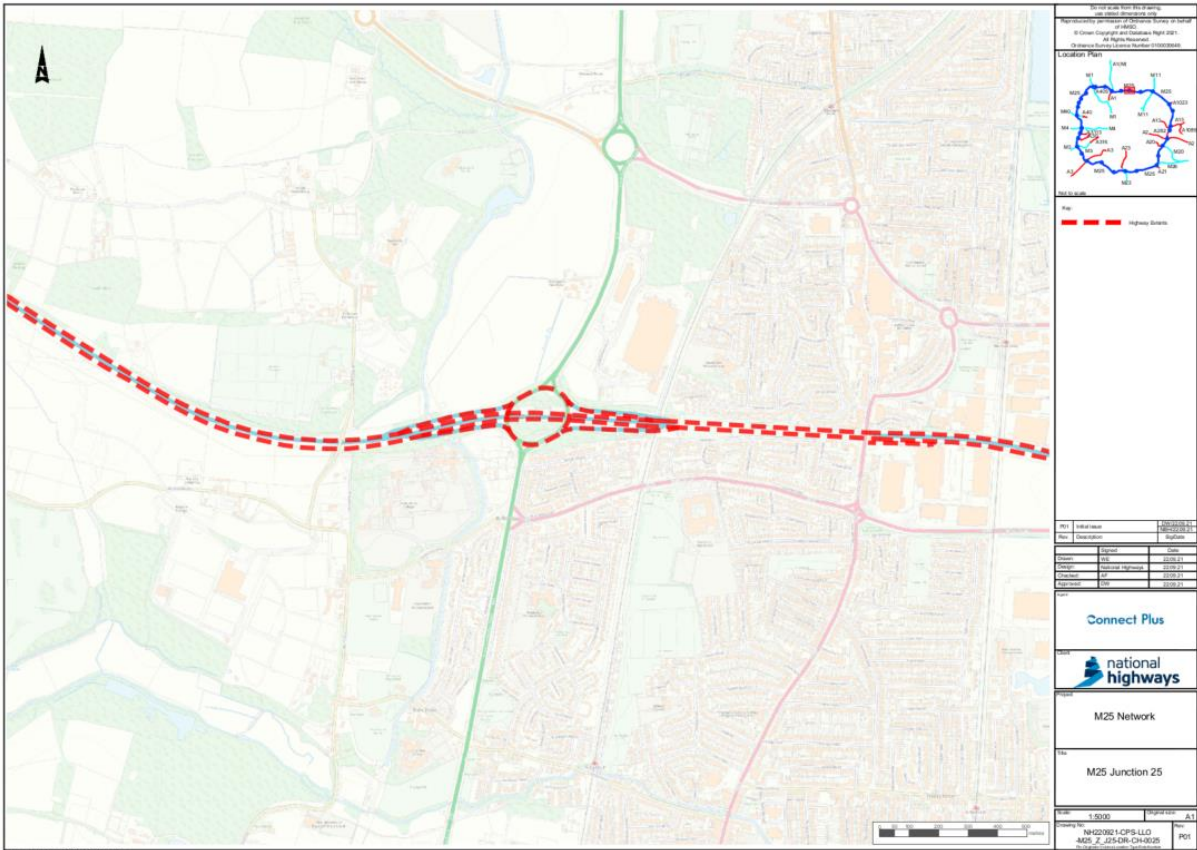


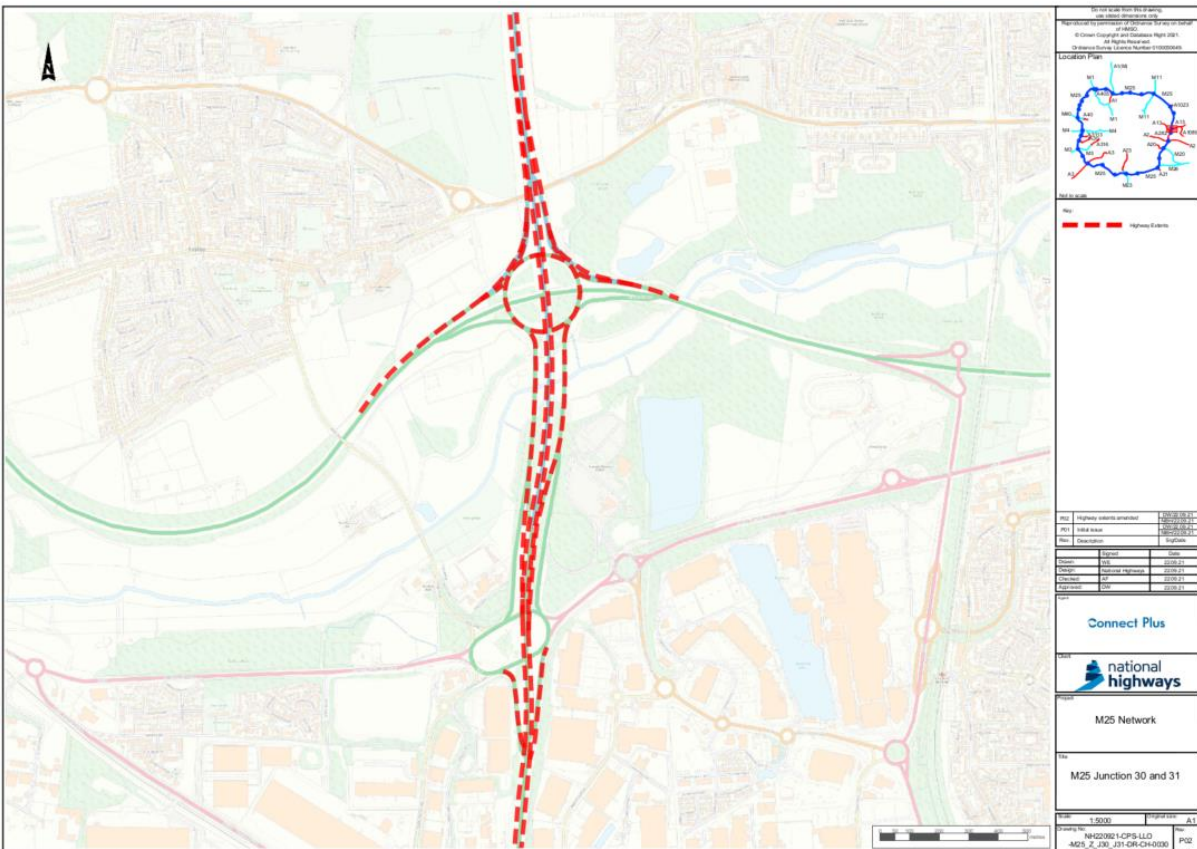
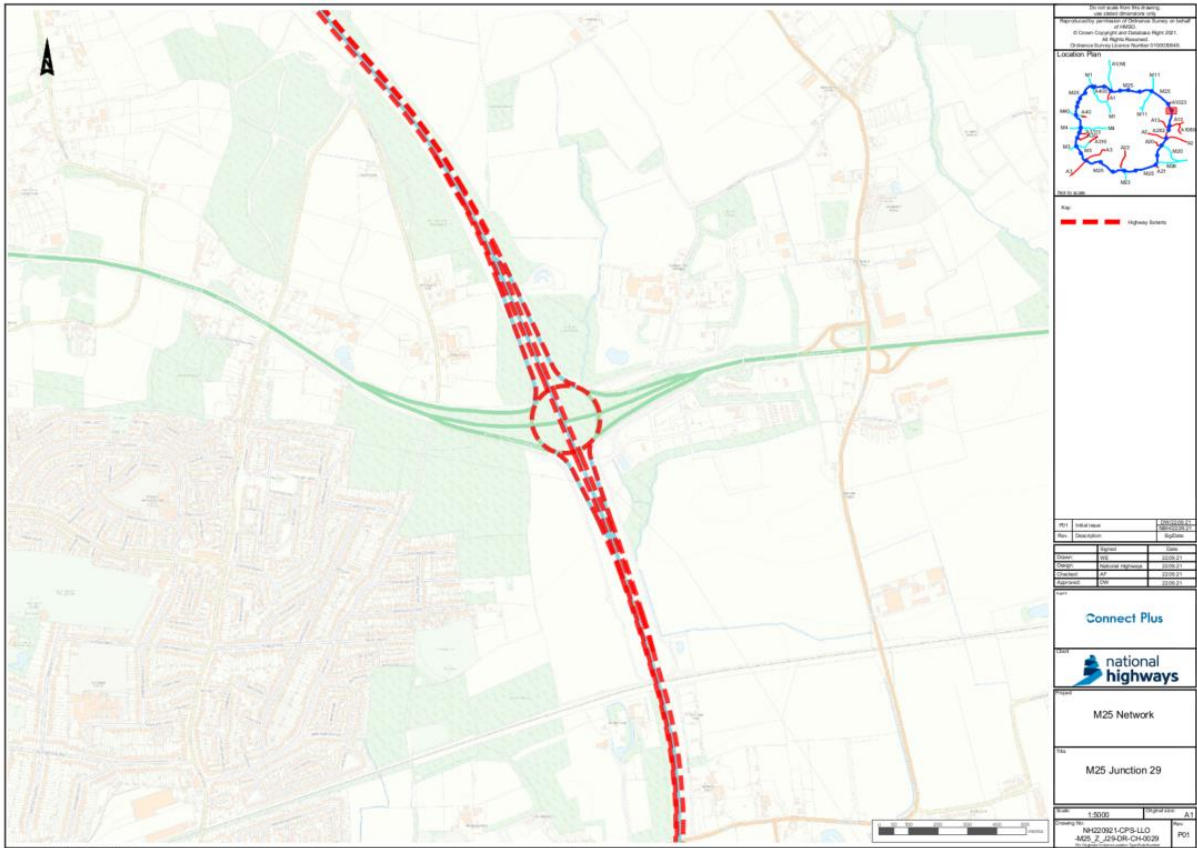








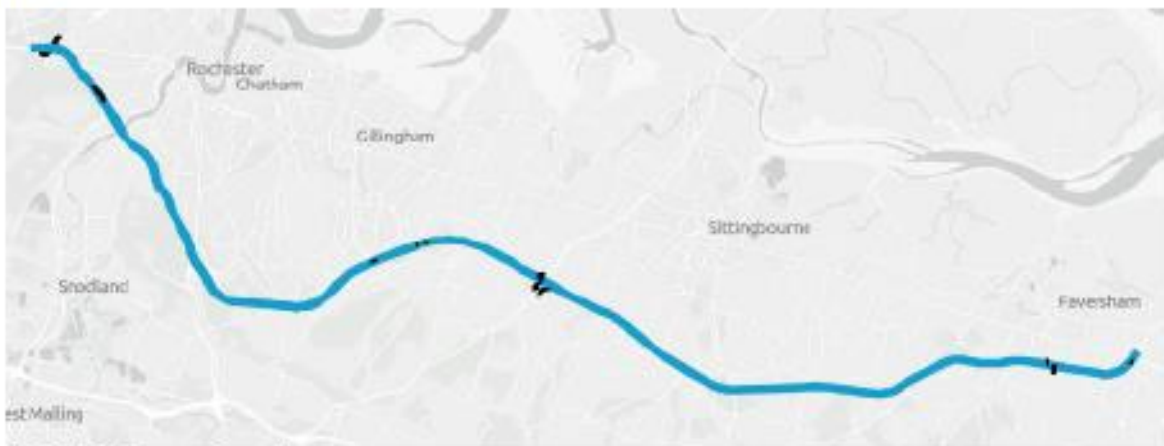




A2 London – M2 Section



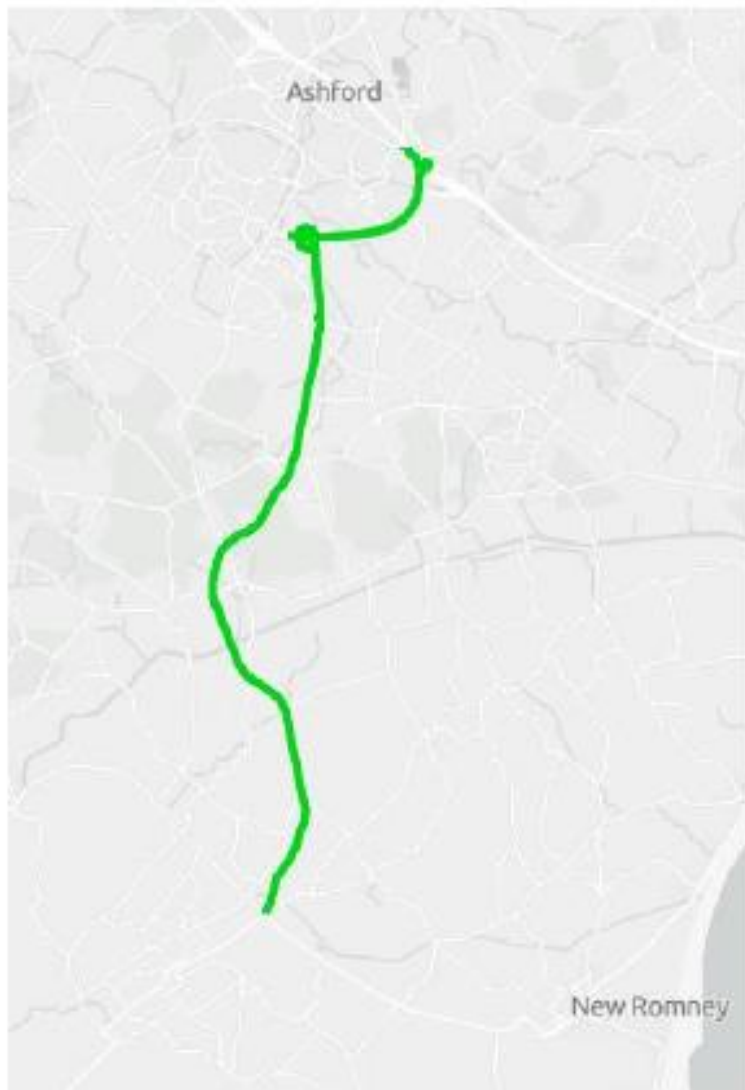
M2



A2 M2 - Dover Section



A2070



Kent & Surrounding areas SRN



5. M26 (the whole motorway) from M25 to M20
6. A21 from the M25 to B2042
7. A23 from M23 to Star Shaw
8. M23 from Junction 7 to Junction 10 (including M23 Gatwick Spur)
9. A23 between North and South Terminal Roundabouts
10. A3 from A309 to B2039 Ripley Junction
11. M3 from Junction 1 to Junction 4
- 11a. A316 from M3 Junction 1 to Felthamhill Brook
12. A30 from M25 Junction 13 to Harrow Road, Stanwell, Feltham
13. A3113 from M25 Junction 14 to A3044
14. M4 from Junction 4B to Junction 7
15. M4 Spur (whole spur) from M4 Junction 4 to M4 Junction 4a
16. M4 from Junction 1 to Junction 4B
17. M40 from M40 Junction 7 to A40 (Fray's River Bridge)
18. M1 from Junction 1 to Junction 8
- 18a. A405 from M25 Junction 21A to M1 Junction 6
- 18b. A1 from Fiveways Corner roundabout to Hilltop Gardens
19. A414 from M1 Junction 8 to A405

SCHEDULE 1 – NAMED DEFENDANTS

For the avoidance of doubt, any person who has previously been a named defendant in these proceedings in the Cotter Injunction, or who has given undertakings to the Court in these proceedings, may nevertheless become Defendant 1 as a person unknown if they commit any of the prohibited acts.

	Name	Details
1.	PERSONS UNKNOWN CAUSING THE BLOCKING OF, OR ENDANGERING, OR OTHERWISE PREVENTING THE FREE FLOW OF TRAFFIC ON THE M25 MOTORWAY, A2, A20 AND A2070 TRUNK ROADS AND M2 AND M20 MOTORWAY, A1(M), A3, A12, A13, A21, A23, A30, A414 AND A3113 TRUNK ROADS AND THE M1, M3, M4, M4 SPUR, M11, M26, M23 AND M40 MOTORWAYS FOR THE PURPOSE OF PROTESTING	
2.	Not used	
3.	Not used	
4.	Not used	
5.	Not used	
6.	Not used	
7.	Not used	
8.	Not used	
9.	Not used	
10.	Not used	
11.	Not used	
12.	Not used	
13.	Not used	
14.	Catherine RENNIE-NASH	

15.	Not used	
16.	Not used	
17.	Not used	
18.	Not used	
19.	Not used	
20.	Not used	
21.	Not used	
22.	Not used	
23.	Not used	
24.	Not used	
25.	Not used	
26.	Not used	
27.	Not used	
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29.	Not used	
30.	Not used	
31.	Not used	
32.	Not used	

33.	Not used	
34.	Not used	
35.	Not used	
36.	Not used	
37.	Not used	
38.	Not used	
39.	Not used	
40.	Not used	
41.	Not used	
42.	Not used	
43.	Not used	
44.	Not used	
45.	Not used	
46.	Not used	
47.	Not used	
48.	Not used	
49.	Not used	
50.	Julia SCHOFIELD	

51.	Not used	
52.	Karen WILDIN	
53.	Liam NORTON	
54.	Louis MCKECHNIE	
55.	Not used	
56.	Not used	
57.	Not used	
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69.	Not used	
70.	Not used	
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73.	Not used	
74.	Not used	
75.	Not used	
76.	Paul SHEEKY	
77.	Not used	
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97.	Not used	
98.	Not used	
99.	Not used	
100.	Tessa-Marie BURNS	
101.	Theresa NORTON	
102.	Not used	
103.	Not used	
104.	Tracey MALLAGHAN	

105.	Not used	
106.	Not used	
107.	Not used	
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133.	Not used	
134.	Not used	
135.	Not used	
136.	Morgan TROWLAND	
137.	Not used	
138.	Not used	
139.	Not used	
140.	Not used	

SCHEDULE 2

CHIEF CONSTABLES OF THE FORCES OF:

City of London Police

Metropolitan Police Service

Avon and Somerset Constabulary

Bedfordshire Police

Cambridgeshire Constabulary

Cheshire Constabulary

Cleveland Police

Cumbria Constabulary

Derbyshire Constabulary

Devon & Cornwall Police

Dorset Police

Durham Constabulary

Essex Police

Gloucestershire Constabulary

Greater Manchester Police

Hampshire Constabulary

Hertfordshire Constabulary

Humberside Police

Kent Police

Lancashire Constabulary

Leicestershire Police

Lincolnshire Police

Merseyside Police

Norfolk Constabulary

North Yorkshire Police

Northamptonshire Police

Northumbria Police

Nottinghamshire Police

South Yorkshire Police

Staffordshire Police

Suffolk Constabulary

Surrey Police

Sussex Police

Thames Valley Police

Warwickshire Police

West Mercia Police

West Midlands Police

West Yorkshire Police

Wiltshire Police