

On behalf of: the Claimant
By: Petra Billing
No: 1
Exhibit: PXB1

Date: 18 April 2024

QB-2021-003576

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

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) CATHERINE RENNIE-NASH AND 9 OTHERS

Defendants

**WITNESS STATEMENT OF
PETRA BILLING**

I, PETRA BILLING, of DLA Piper UK LLP, 1 St Pauls Place, Sheffield S1 2JX, **WILL SAY** as follows:

1. I am a solicitor of the Senior Courts of England and Wales and a Partner at DLA Piper UK LLP with day-to-day supervisory conduct of this matter. I am authorised to make this Witness Statement on behalf of the Claimant. Where I rely upon information supplied to me, I state the source and believe that information to be correct.
2. I make this statement in support of the Claimant's application dated 27 March 2024 referred to as **the Application** in this witness statement, which reference is

intended to include those supporting documents filed with the application notice dated 27 March 2024 (referred to at paragraphs 2.1, 2.2 and 2.3 below), to provide an update to the Court as to:

- 2.1 service of the notice of hearing and the Application upon the Defendants;
 - 2.2 consent by the Police as to the order for Third-Party Disclosure sought by the Claimant at paragraphs 10 to 12 of the draft order (“**Draft Order**”) filed with the Application; and
 - 2.3 pertinent press releases and social media posts published by JSO since the Application was filed and Sean Martell signed his Second Witness on 26 March 2024 (“**Martell 2**”), in which he also addressed pertinent social media posts published prior to that date.
3. Defined terms in the Application and Draft Order are adopted in this Witness Statement.

Service of the Notice of Hearing and the Application

Notice of Hearing

4. Pursuant to paragraph 19 of the Original Cotter Order (a copy of which is at tab 20 of the Hearing Bundle), the Original Cotter Order is to be reconsidered at a hearing on Friday 26 April 2024 at 10.30 am (“**Review Hearing**”), with no further application by the Claimant being required for the hearing to be listed.
5. On 12 March 2024 at 15:31, my colleague Ms Higson contacted the King’s Bench Listing Office by email to request confirmation that the Review Hearing had been listed. The King’s Bench Listing Office confirmed by email on 13 March 2024 at 08:11 that the Review Hearing had been listed on 26 April 2024 with a time estimate of 1 hour (page 1 of **PXB1**).
6. Paragraph 19 of the Original Cotter Order further provides that in respect of the listing of the Review Hearing, “*It will be the Claimant’s responsibility to place details of the hearing on the Injunction Website*”. The Claimant therefore placed a copy of the email exchange with the Court referred to at paragraph 5 above (“**Notice of Hearing**”) on the National Highways’ Injunction Website, being <https://nationalhighways.co.uk/about-us/high-court-injunctions-for-motorways-and-major-a-roads/> on 19 March 2024 at 16:10. The URL for the Notice of

Hearing as displayed on the National Highways' Injunction Website is: <https://nationalhighways.co.uk/media/g3dmkxec/notice-of-review-hearing-on-26-april-2024-half-day-estimate-133324836-1.pdf>. In addition to adding a copy of the Notice of Hearing to the National Highways' Injunction Website, additional text was added to the landing page which reads: "*The court has scheduled a hearing for 26 April 2024 at the Royal Courts of Justice, Strand, London, at which it will reconsider the continuation of the injunction*".

7. A certificate of service evidencing service of the Notice of Hearing is exhibited at page 3 of **PXB1**.
8. On 28 March 2024, Ms Higson was in further email correspondence with the King's Bench Listing Office, and upon the recommendation of Counsel for the Claimant, the time estimate for the hearing on 26 April 2024 was amended to a half day. A true copy of this exchange, exhibited at page 5 of **PXB1**, was also uploaded to the National Highways' Injunction Website on 28 March 2024.

The Application

9. The sealed Application was received from the Court at 07:38 on 28 March 2024. The Claimant confirmed in the Application Notice that it would effect service of the Application and supporting documents upon the Defendants in accordance with the terms of the Original Cotter Order.
10. In accordance with paragraph 5(a) of the Original Cotter Order, the Application (being the documents at tabs 1 to 4 of the Hearing Bundle) was served on the First Defendant by:
 - 10.1 Posting direct links to the Application on the National Highways' Injunction Website on 28 March 2024;
 - 10.2 Sending a notification to the Press Association containing a link to the National Highways' Injunction Website hosting the Application on 3 April 2024;
 - 10.3 Publishing social media posts on the Claimant's Twitter and Facebook platforms on 2 April 2024 advertising that the Application had been made and confirming the details of the Review Hearing (true copies of which are exhibited at pages 8 and 9 of **PXB1**); and

- 10.4 Emailing a true copy of the Application to the email addresses listed at paragraph 5(a)(iv) of the Original Cotter Order at 15:45 on 27 March 2024.
11. Certificates of service evidencing the steps taken by the Claimant to serve the Application on the First Defendant as detailed above are exhibited at pages 10 to 19 of **PXB1**.
12. In accordance with paragraph 7 of the Original Cotter Order, the Claimant served the Application upon the named Defendants by:
- 12.1 Placing a copy of the Application on the National Highways' Injunction Website on 28 March 2024;
- 12.2 Emailing a secure link to the Application (due to the file size of the Application being too large to attach to an email) to the named Defendants who have provided their email addresses to DLA and / or the Claimant at 14:18 on 28 March 2024. A true copy of the letter under cover of which the Application was served is exhibited at page 20 of **PXB1**, and a true copy of the email serving the Application is exhibited at page 22 of **PXB1**. The letter advises the Defendants that the Application is also available to view on the National Highways' Injunction Website and provides a link to the same. The Defendants' email addresses were BCC'd to the email serving the Application for GDPR purposes and in compliance with the Claimant's obligations at paragraph 14 of the Original Cotter Order; and
- 12.3 Posting a copy of the Application by first class post and by special delivery to those named Defendants who have either not provided their email addresses to DLA or to the Claimant, or who have requested service of documents in these proceedings by post. The addresses to which the Application was posted are those addresses that were provided by the named Defendants to the Police upon their arrest and which were subsequently provided to the Claimant pursuant to the Third-Party Disclosure provisions in the predecessor orders to the Original Cotter Order. True copies of the covering letters enclosing the Application (with addresses redacted) are exhibited at pages 24 to 37 of **PXB1**.
13. Certificates of service evidencing the steps taken by the Claimant to serve the Application on the named Defendants as detailed above are exhibited at pages 38

to 61 of **PXB1**, and a schedule summarising the methods of service addressed above is exhibited at page 62 of **PXB1** with addresses redacted.

Third-Party Disclosure

14. On 5 April 2024 at 09:50, I emailed Andrew Holt of the Directorate of Legal Services for the Metropolitan Police Service and the Police Representative Assistant Chief Constable (“ACC”) Owen Weatherill, seeking consent from Owen Weatherill, on behalf of all of the Chief Constables for the police forces listed at Schedule 2 to the Draft Order to the order for third party disclosure sought by the Claimant at paragraph 10 of the Draft Order.
15. On the same day at 15:37, I received an email from Inspector Michael Jackson-Matthews, Staff Officer to ACC Mark Williams, confirming that ACC Owen Weatherill had retired, and that ACC Williams who had assumed the role would consider the Claimant’s email request for consent to third party disclosure provisions contained in the Draft Order.
16. On 8 April 2024 at 13:42 ACC Williams by email confirmed his consent to the third-party disclosure provisions at paragraph 10 of the Draft Order on behalf of the Chief Constables for all of the police forces listed at Schedule 2 to the Draft Order. A true copy of this email exchange is exhibited at pages 63 to 66 of **PXB1**.
17. Due to the retirement of ACC Owen Weatherill, the wording of the fourth recital and paragraph 14 of the Draft Order sought has now been amended to reflect that consent has been given by ACC Mark Williams to the revised draft Order (“**Revised Draft Order**”) and service of that order (if granted) upon the Chief Constables should accordingly be effected upon ACC Mark Williams instead of ACC Owen Weatherill. The Revised Draft Order is exhibited at pages 68 to 107 of **PXB1**.

Continued Threat from JSO

18. I concur with Sean Martell in Martell 2 that whilst to my knowledge there have been no direct protests by JSO on the Roads (as defined in the Revised Draft Order now sought by the Claimant) since the grant of the Original Cotter Order/the Cotter Injunction, JSO continues to be a prolific protest organisation that is growing and diversifying to encompass new subgroups to include links or

membership to Injunction Injustice and Youth Demand, as set out in paragraph 40 of Martell 2.

19. One such subgroup, Youth Demand, threatened on 7 April 2024 to carry out co-ordinated ‘attacks’ on the London Underground by flooding the central Tube stations with protestors and blocking train carriages to cause disruption to commuters and tourists. Many of those involved with the protest group have said they would be willing to remain in place until arrested and removed by the police, a tactic which has been routinely deployed by JSO, and Insulate Britain before it (see news article at pages 108 to 116 of **PXB1**).
20. In an April Fool’s Day press release, JSO announced a partnership with Gorilla Glue, including the following quote: “*From glueing (sic) to roads or government departments, our incredibly strong range of polyurethane epoxy will keep environmental defenders in place for longer*”. See pages 117 to 119 of **PXB1**.
21. The existence of the Cotter Injunction has been widely publicised. In a post on X on 16 April 2024 at 10:35 am, Tessa Marie (Tez) Burns (D100), referring to the Structures Injunction, states: “*There is a National Highways Limited injunction on climbing up on the gantries and we’re being prosecuted under that*”. In a further post that day titled “*WTF ARE INJUNCTIONS?*”, JSO states that: “*Since the Insulate Britain Campaign, [injunctions] have been increasingly used...*” (see pages 120 to 122 of **PXB1**).
22. A former named defendant to the Structures Injunction, Cressida Gethian, who climbed a gantry on the M25 on 20 July 2022, has been quoted in a Daily Mail article dated 16 April 2024 saying that she “*would do it all again*” (pages 123 to 127 of **PXB1**).
23. I agree with the statement of Mr Martell at paragraph 35 of Martell 2 that the approach of NHL in obtaining and enforcing its injunctions has without doubt had a deterrent effect such that JSO and its associated groups are seemingly as a result less inclined to target the Roads when carrying out their protest actions. I believe that this deterrent effect has been strengthened also by the existence of the Cotter Injunction (and its predecessor injunctions) being well known to the public. This, in my opinion, is strong justification for the continuance of the Cotter Injunction as sought in the Revised Draft Order. I believe that if the Cotter Injunction were not extended at this time, that there is a very real and credible risk that JSO and its

associated organisations would once again target the Roads as defined in the Cotter Injunction and the Revised Draft Order sought given repeated statements on social media to the effect that JSO protesters “would do it again” or words of a similar nature.

Statement of Truth

24. I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Dated: 18 April 2024



.....

PETRA BILLING

On behalf of: the Claimant
By: Petra Billing
No: 1
Exhibit: PXB1

Date: 18 April 2024

QB-2021-003576

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

BETWEEN:

NATIONAL HIGHWAYS LIMITED

Claimant

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(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) CATHERINE RENNIE-NASH AND 9 OTHERS

Defendants

EXHIBIT PXB1

This is the exhibit marked PXB1 referred to in the Witness Statement of Petra Billing dated this 18th day of April 2024.

Signed:


Laura Higson

From: KB Judges Listing Office <KBJudgesListingOffice@Justice.gov.uk>
Sent: 13 March 2024 08:11
To: Laura Higson
Cc: NH-Injunctions
Subject: RE: QB-2021-003576, 3636 and 3737 - National Highways Limited v Persons Unknown and Ors [DLAP-UKMATTERS.FID7033083]

****EXTERNAL****

Dear Sirs

Further to your email below, the hearing is listed for 26th April for 1 hour.
A judge has not yet been assigned.

Regards

(Mon-Fri 7am-2:30pm)


Team Leader

King's Bench Judge's Listing Office

King's Bench Division | HMCTS | Royal Courts of Justice | Strand, London | WC2A 2LL

Phone: 020 3936 8957

Web: www.gov.uk/hmcts

 HM Courts & Tribunals Service

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From: Laura Higson
Sent: 12 March 2024 15:31
To: KB Judges Listing Office <KBJudgesListingOffice@Justice.gov.uk>
Cc: NH-Injunctions <NH-Injunctions@dlapiper.com>
Subject: QB-2021-003576, 3636 and 3737 - National Highways Limited v Persons Unknown and Ors [DLAP-UKMATTERS.FID7033083]

Dear Sirs,

We are instructed by National Highways Limited, the Claimant in the above case.

Pursuant to paragraph 19 of the order of Mr Justice Cotter made on 5 May 2023 (“**Order**”) (a copy of which is attached), the Order is to be reconsidered at a hearing on Friday 26 April 2024 at 10.30 am, with no further application by the Claimant being required for the hearing to be listed.

We should be grateful if the Court would kindly confirm whether the hearing for the review of the Order has been listed on 26 April 2024. If a Judge has been assigned to the hearing, we should also be grateful to receive confirmation of the name of the Judge and their clerk.

We look forward to hearing from you.

Yours faithfully,

DLA Piper UK LLP
www.dlapiper.com

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Certificate of service

Name of court High Court of Justice King's Bench Division	Claim No. QB-2021-003576 QB-2021-003626 and QB-2021-003737
Name of Claimant NATIONAL HIGHWAYS LIMITED	
Name of Defendant 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) CATHERINE RENNIE-NASH AND 9 OTHERS	

On what day did you serve? 1 9 / 0 3 / 2 0 2 4

The date of service is 1 9 / 0 3 / 2 0 2 4

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

Notice of Hearing

On whom did you serve?

(If appropriate include their position e.g. partner, director).

The Defendants

How did you serve the documents?

(please tick the appropriate box)

- by first class post or other service which provides for delivery on the next business day
- by delivering to or leaving at a permitted place
- by personally handing it to or leaving it with (.....time left, where document is other than a claim form) (please specify)

- by other means permitted by the court (please specify)

- By Document Exchange
- by fax machine (.....time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet)
- by other electronic means (16.10 time sent, where document is other than a claim form) (please specify)

By placing the Notice of Hearing on the National Highways Injunctions Website

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

<https://nationalhighways.co.uk/about-us/high-court-injunctions-for-motorways-and-major-a-roads/>

- Being the claimant's defendant's
- solicitor's litigation friend
- usual residence
 - last known residence
 - place of business
 - principal place of business
 - last known place of business
 - last known principal place of business
 - principal office of the partnership
 - principal office of the corporation
 - principal office of the company
 - place of business of the partnership/company/corporation within the jurisdiction with a connection to claim
 - other (please specify)


Injunctions Website

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

I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

N215 Certificate of service (09.11) This form is reproduced from <http://hmctsformfinder.justice.gov.uk/HMCTS/FormFinder.do> and is subject to Crown copyright protection. Contains public sector information licensed under the Open Government Licence v2.0

Full name

Signed 
Claimant's solicitor

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

Date

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

Calculation of deemed day of service of a claim

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

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

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

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

Laura Higson

From: KB Judges Listing Office <KBJudgesListingOffice@Justice.gov.uk>
Sent: 28 March 2024 10:19
To: Laura Higson
Cc: NH-Injunctions
Subject: RE: QB-2021-003576 National Highways Limited v PERSONS UNKNOWN CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBST.. [DLAP-UKMATTERS.FID7033083]

****EXTERNAL****

Dear Sirs

The time estimate has been amended to ½ day

Regards

(Mon-Fri 7am-2:30pm)


Team Leader

King's Bench Judge's Listing Office

King's Bench Division | HMCTS | Royal Courts of Justice | Strand, London | WC2A 2LL

Phone: 020 3936 8957

Web: www.gov.uk/hmcts

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From: Laura Higson
Sent: 28 March 2024 10:05
To: KB Judges Listing Office <KBJudgesListingOffice@Justice.gov.uk>
Cc: NH-Injunctions <NH-Injunctions@dlapiper.com>
Subject: RE: QB-2021-003576 National Highways Limited v PERSONS UNKNOWN CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBST.. [DLAP-UKMATTERS.FID7033083]

Dear Sirs,

The hearing of this matter has been listed on 26 April 2024 at 10.30 am, with a time estimate of one hour.

Counsel for the Claimant considers that an appropriate time estimate for the hearing is half a day, and we should therefore be grateful if the Court would amend the listing accordingly.

We attach our earlier email correspondence confirming the listing of the hearing for your ease of reference.

Kind regards,

DLA Piper UK LLP

DLA Piper UK LLP

From: KB Judges Listing Office <KBJudgesListingOffice@Justice.gov.uk>
Sent: Thursday, March 28, 2024 7:47 AM
To: Laura Higson
Subject: QB-2021-003576 National Highways Limited v PERSONS UNKNOWN CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBST..

****EXTERNAL****

Dear Sirs

I write in reference to the attached application filed.

Can you provide dates for the application to be listed from 29th April onwards

Regards

(Mon-Fri 7am-2:30pm)


Team Leader

King's Bench Judge's Listing Office

King's Bench Division | HMCTS | Royal Courts of Justice | Strand, London | WC2A 2LL

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National Highways

@NationalHwys



We're determined to prevent disruption on our roads. So we've applied for an extension to our injunction to prevent the M25/M25 feeder roads/major roads in Kent being obstructed for protest purposes. 1/2



3:07 PM · Apr 2, 2024 · 9,489 Views



8



2



15



Post your reply

Reply



National Highways @NationalHwys · Apr 2



The application hearing is on 26.4.24 at The Royal Courts of Justice, Strand, London, WC2A 2LL.

A full copy of the application and supporting documents can be found at:

nationalhighways.co.uk/about-us/high-... 2/2

8



2

3.5K





National Highways



2 April at 15:07 · 🌐

Our roads enable the safe, smooth movement of people and goods to keep daily lives and businesses running as we all expect. We're determined to prevent disruption on our roads, so we've applied for a two-year extension to the injunction that's in place to prevent the M25, M25 feeder roads and major roads in Kent being obstructed for protest purposes.

The application hearing is on 26.4.24 at The Royal Courts of Justice, Strand, London, WC2A 2LL.

A full copy of the application and supporting documents can be found at:

 <https://nationalhighways.co.uk/.../high-court.../> See less



9



Certificate of service

Name of court High Court of Justice King's Bench Division	Claim No. QB-2021-003576 QB-2021-003626 and QB-2021-003737
Name of Claimant NATIONAL HIGHWAYS LIMITED	
Name of Defendant 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) CATHERINE RENNIE-NASH AND 9 OTHERS	

On what day did you serve? 2 8 / 0 3 / 2 0 2 4

The date of service is 2 8 / 0 3 / 2 0 2 4

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

1. Application Notice dated 27 March 2024
2. Second Witness Statement of Sean Foster Martell dated 26 March 2024
3. Exhibit SFM2 to the Second Witness Statement of Sean Foster Martell dated 26 March 2024
4. Draft Order

On whom did you serve?

(If appropriate include their position e.g. partner, director).

The First Defendant

How did you serve the documents?

(please tick the appropriate box)

- by first class post or other service which provides for delivery on the next business day
- by delivering to or leaving at a permitted place
- by personally handing it to or leaving it with (.....time left, where document is other than a claim form) *(please specify)*

- by other means permitted by the court *(please specify)*

- By Document Exchange
- by fax machine (.....time sent, where document is other than a claim form) *(you may want to enclose a copy of the transmission sheet)*
- by other electronic means (11.30 time sent, where document is other than a claim form) *(please specify)*

By placing the documents on the National Highways Injunctions Website

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

<https://nationalhighways.co.uk/about-us/high-court-injunctions-for-motorways-and-major-a-roads/>

- Being the** claimant's defendant's
- solicitor's litigation friend
- usual residence
 - last known residence
 - place of business
 - principal place of business
 - last known place of business
 - last known principal place of business
 - principal office of the partnership
 - principal office of the corporation
 - principal office of the company
 - place of business of the partnership/company/corporation within the jurisdiction with a connection to claim
 - other *(please specify)*

Injunctions Website

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

I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Full name

Signed



Claimant's solicitor

Position
or office
held

(If signing on behalf of firm or
company)

Date

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

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

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

Certificate of service

Name of court High Court of Justice King's Bench Division	Claim No. QB-2021-003576 QB-2021-003626 and QB-2021-003737
Name of Claimant NATIONAL HIGHWAYS LIMITED	
Name of Defendant 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) CATHERINE RENNIE-NASH AND 9 OTHERS	

On what day did you serve?	0	3	/	0	4	/	2	0	2	4
The date of service is	0	3	/	0	4	/	2	0	2	4

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

1. Application Notice dated 27 March 2024 2. Second Witness Statement of Sean Foster Martell dated 26 March 2024 3. Exhibit SFM2 to the Second Witness Statement of Sean Foster Martell dated 26 March 2024 4. Draft Order
The First Defendant

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

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

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

by delivering to or leaving at a permitted place

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

by other means permitted by the court (please specify)

By Document Exchange

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

by other electronic means (10.26 time sent, where document is other than a claim form) (please specify)

By placing sending a notification of the existence of the Application to the Press Association

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

copy@pa.media

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

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

Contact email addresses for The Press Association

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Full name

Signed
Claimant's solicitor

Position or office held
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Date

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By Document Exchange

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

by other electronic means (15.07 time sent, where document is other than a claim form) (please specify)

By publishing a social media post on the National Highways Facebook platform advertising the existence of the Application

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

<https://www.facebook.com/photo/?fbid=752088253707403&set=a.269735381942695>

- Being the claimant's defendant's
- solicitor's litigation friend
- usual residence
- last known residence
- place of business
- principal place of business
- last known place of business
- last known principal place of business
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Facebook profile

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Full name

Signed
Claimant's solicitor

Position or office held
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The First Defendant

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By publishing a social media post on the National Highways X (formerly known as Twitter) platform advertising the existence of the Application

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

<https://twitter.com/NationalHways/status/1775163198749982901>

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

- usual residence
- last known residence
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- principal office of the corporation
- principal office of the company
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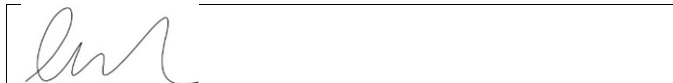
X (formerly known as Twitter) profile

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Full name

Signed



Claimant's solicitor

Position or office held

(If signing on behalf of firm or company)

Date

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On what day did you serve?	2	7	/	0	3	/	2	0	2	4
The date of service is	2	7	/	0	3	/	2	0	2	4

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

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

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

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

by other electronic means (15.45 time sent, where document is other than a claim form) (please specify)

By email

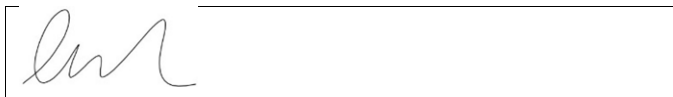
Email addresses

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Full name Laura Natasha Higson

Signed



Claimant's solicitor

Position or office held

Associate

(If signing on behalf of firm or company)

Date

0 4 0 4 2 0 2 4

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Your reference

Our reference

LNH/PXB/439241/15
UKM/133307115.1

By Email Only

28 March 2024

Dear Sir/Madam

CLAIMANT: NATIONAL HIGHWAYS LIMITED

CLAIM NOS: QB-2021-003576, 002626 AND 003737

**HEARING: 26 APRIL 2024 AT 10.30 AM AT THE ROYAL COURTS OF JUSTICE,
STRAND, LONDON WC2A 2LL**

As you are aware, we are instructed by National Highways Limited (“NHL”), the Claimant in the above claim.

We enclose, by way of service, NHL’s application for the continuation of the Order of Mr Justice Cotter made on 5 May 2023 (the “**Cotter Injunction**”), comprising:

1. Application Notice dated 27 March 2024;
2. Second Witness Statement of Sean Foster Martell dated 26 March 2024;
3. Exhibit SFM2 to the Second Witness Statement of Sean Foster Martell dated 26 March 2024;
and
4. A draft of the order that NHL is asking the Court to make.

The Court has listed a hearing on 26 April 2024 at 10.30 am at the Royal Courts of Justice, Strand, London WC2A 2LL where it will review whether it should vary the Cotter Injunction (“**Review Hearing**”). At the Review Hearing, NHL will ask the Court to:

1. continue the final injunction set out in the Cotter Injunction for a further 2 years;
2. amend the Schedule of Named Defendants to the Cotter Injunction; and
3. list this matter for a further review hearing in April 2026 to determine whether there should be a further continuation of the Cotter Injunction.

A copy of an email from the Court confirming the listing of the hearing is enclosed and should be taken as the official Notice of Hearing.

NHL’s Skeleton Argument, the Hearing Bundle and NHL’s Statement of Costs for the Review Hearing will be made available on NHL’s Injunctions Website at <https://nationalhighways.co.uk/about-us/high->

DLA Piper UK LLP is authorised and regulated by the Solicitors Regulation Authority.

DLA Piper UK LLP is a limited liability partnership registered in England and Wales (registered number OC307847) which is part of DLA Piper, a global law firm, operating through various separate and distinct legal entities.

A list of members is open for inspection at its registered office and principal place of business, 160 Aldersgate Street, London, EC1A 4HT and at the address at the top of this letter. Partner denotes member of a limited liability partnership.

A list of offices and regulatory information can be found at dlapiper.com.

UK switchboard
+44 (0) 20 7349 0296

[court-injunctions-for-motorways-and-major-a-roads/m25-feeder-and-kent-roads-injunction-judgment-and-documents/](#) during the week commencing 22 April 2024. If you have provided your email address to NHL and / or DLA, copies will also be served upon you by email. If you have not already provided an email address and would like to receive these documents by email, please confirm your email address to NH-Injunctions@dlapiper.com.

The court room in which the Review Hearing will be heard will be confirmed by the Court in the afternoon of 25 April 2024 and will be published by the Court on the daily cause list at <https://www.gov.uk/government/publications/royal-courts-of-justice-cause-list/royal-courts-of-justice-daily-cause-list#kings-bench-judges-daily-cause-list>. Please note that the Review Hearing is presently listed with a time estimate of one hour, however NHL has requested that the Court extend this time estimate to half a day.

Please confirm by email to NH-Injunctions@dlapiper.com if you intend to instruct a firm of solicitors or a barrister to represent you at the Review Hearing. If you intend to make representations at the hearing, please provide any statement you intend to provide to the Court and/or the evidence upon which you will rely by email to NH-Injunctions@dlapiper.com as soon as possible. Any such statement and/or evidence should also be filed with the court in advance of the hearing.

If you are unsure about the contents of this letter or its enclosures, we recommend that you seek independent legal advice as soon as possible.

All correspondence should be directed to this firm at the above address or by email to: NH-Injunctions@dlapiper.com.

Yours faithfully



DLA Piper UK LLP

Enc.

From: secure.filetransfer@comms.dlapiper.com
Sent: 28 March 2024 14:18
To: NH-Injunctions
Subject: QB-2021-003576, 3626 and 3737 - National Highways Limited v Persons Unknown and Ors - Hearing on 26 April 2024 at 10.30 am at the Royal Courts of Justice, Strand, London, WC2A 2LL



Error! Hyperlink reference not valid. sent you a secure message


[Access message](#)


Dear Sir/Madam


Please see the correspondence and enclosures attached, which have been sent to you by email only.

Yours faithfully,

DLA Piper UK LLP

 Attachments expire on Apr 26, 2024

 **4 PDFs**
20240326 Witness Statement of Sean Martell.pdf, 20240327 SEALED Application Notice.pdf, 20240328 Letter serving Application (Email Only).pdf, 20240326 Exhibit SFM2.pdf

 **1 document**
20240327 Draft Order.docx

This message requires that you sign in to access the message and any file attachments.

Julia Schofield

Your reference

Our reference

LNH/PXB/439241/15
UKM/133307115.1

By First Class Post and Special Delivery

28 March 2024

Dear Sir/Madam

CLAIMANT: NATIONAL HIGHWAYS LIMITED**CLAIM NOS: QB-2021-003576, 002626 AND 003737****HEARING: 26 APRIL 2024 AT 10.30 AM AT THE ROYAL COURTS OF JUSTICE,
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UK switchboard
+44 (0) 20 7349 0296

[court-injunctions-for-motorways-and-major-a-roads/m25-feeder-and-kent-roads-injunction-judgment-and-documents/](#) during the week commencing 22 April 2024. If you have provided your email address to NHL and / or DLA, copies will also be served upon you by email. If you have not already provided an email address and would like to receive these documents by email, please confirm your email address to NH-Injunctions@dlapiper.com.

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Yours faithfully



DLA Piper UK LLP

Enc.

Liam Norton

Your reference

Our reference

LNH/PXB/439241/15
UKM/133307115.1

By First Class Post and Special Delivery

28 March 2024

Dear Sir/Madam

CLAIMANT: NATIONAL HIGHWAYS LIMITED**CLAIM NOS: QB-2021-003576, 002626 AND 003737****HEARING: 26 APRIL 2024 AT 10.30 AM AT THE ROYAL COURTS OF JUSTICE,
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Enc.

Louis McKechnie

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UKM/133307115.1**By First Class Post and Special Delivery**

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Yours faithfully



DLA Piper UK LLP

Enc.



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DX: 708580 Sheffield 10
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F: +44 (0) 114 270 0568 or +44 (0)
114 273 8948
dlapiper.com

Louis McKechnie

Your reference

Our reference

LNH/PXB/439241/15
UKM/133307115.1

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Morgan Trowland

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Tracey Mallaghan

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Certificate of service

Name of court High Court of Justice King's Bench Division	Claim No. QB-2021-003576 QB-2021-003626 and QB-2021-003737
Name of Claimant NATIONAL HIGHWAYS LIMITED	
Name of Defendant 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) CATHERINE RENNIE-NASH AND 9 OTHERS	

On what day did you serve?	2 8 / 0 3 / 2 0 2 4
The date of service is	2 8 / 0 3 / 2 0 2 4

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

1. Covering Letter dated 28 March 2024
2. Application Notice dated 27 March 2024
3. Second Witness Statement of Sean Foster Martell dated 26 March 2024
4. Exhibit SFM2 to the Second Witness Statement of Sean Foster Martell dated 26 March 2024
5. Draft Order

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

Catherine Rennie-Nash

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

by first class post or other service which provides for delivery on the next business day
 by delivering to or leaving at a permitted place
 by personally handing it to or leaving it with (.....time left, where document is other than a claim form) (please specify)
 by other means permitted by the court (please specify)
 By Document Exchange
 by fax machine (.....time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet)
 by other electronic means (14.18 time sent, where document is other than a claim form) (please specify)
 By email

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

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


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

Email address _____

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

I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Full name

Signed 

Claimant's solicitor

Position or office held

(If signing on behalf of firm or company)

Date

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

Calculation of deemed day of service of a claim

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

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

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

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Certificate of service

Name of court High Court of Justice King's Bench Division	Claim No. QB-2021-003576 QB-2021-003626 and QB-2021-003737
Name of Claimant NATIONAL HIGHWAYS LIMITED	
Name of Defendant 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) CATHERINE RENNIE-NASH AND 9 OTHERS	

On what day did you serve? 2 8 / 0 3 / 2 0 2 4

The date of service is 0 2 / 0 4 / 2 0 2 4

What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

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4. Exhibit SFM2 to the Second Witness Statement of Sean Foster Martell dated 26 March 2024
5. Draft Order

On whom did you serve?

(If appropriate include their position e.g. partner, director).

Julia Schofield

How did you serve the documents?

(please tick the appropriate box)

- by first class post or other service which provides for delivery on the next business day
- by delivering to or leaving at a permitted place
- by personally handing it to or leaving it with (.....time left, where document is other than a claim form) (please specify)

- by other means permitted by the court (please specify)

- By Document Exchange
- by fax machine (.....time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet)
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Give the address where service effected, include fax or DX number, e-mail address or other electronic identification


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

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

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

I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Full name

Signed 
Claimant's solicitor

Position or office held
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Date

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On whom did you serve?
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Karen Wildin

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

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by other means permitted by the court (please specify)

By Document Exchange

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

by other electronic means (14.18 time sent, where document is other than a claim form) (please specify)

By email

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

Being the claimant's defendant's

solicitor's litigation friend


- usual residence
- last known residence
- place of business
- principal place of business
- last known place of business
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Email address

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Liam Norton

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solicitor's litigation friend

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Louis McKechnie

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On what day did you serve?	2	8	/	0	3	/	2	0	2	4
The date of service is	0	2	/	0	4	/	2	0	2	4

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Louis McKechnie

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Morgan Trowland

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Paul Sheeky

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

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by delivering to or leaving at a permitted place

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

by other means permitted by the court (please specify)

By Document Exchange

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

by other electronic means (14.18 time sent, where document is other than a claim form) (please specify)

By email

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

Being the claimant's defendant's

solicitor's litigation friend

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

Email address

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

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Full name

Signed
Claimant's solicitor

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

Date

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Certificate of service

Name of court High Court of Justice King's Bench Division	Claim No. QB-2021-003576 QB-2021-003626 and QB-2021-003737
Name of Claimant NATIONAL HIGHWAYS LIMITED	
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On what day did you serve?	2	8	/	0	3	/	2	0	2	4
The date of service is	2	8	/	0	3	/	2	0	2	4

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3. Second Witness Statement of Sean Foster Martell dated 26 March 2024
4. Exhibit SFM2 to the Second Witness Statement of Sean Foster Martell dated 26 March 2024
5. Draft Order

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

Stephen Charles Gower

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

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Tessa-Marie Burns

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Theresa Norton

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Full name

Signed

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Tracey Mallaghan

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SCHEDULE – Service of Application

Defendant Number	Name	Service Address	Letter serving Application	
			Email	Post
1.	PERSONS UNKNOWN	As set out at paragraph 4 of the Order of Cotter J dated 5 May 2023	X	
14.	Catherine RENNIE-NASH		X	
50.	Julia SCHOFIELD			X
52.	Karen WILDIN		X	
53.	Liam NORTON			X
54.	Louis MCKECHNIE			X
76.	Paul SHEEKY		X	
93.	Stephen Charles GOWER		X	
100.	Tessa-Marie BURNS		X	
101.	Theresa NORTON			X
104.	Tracey MALLAGHAN			X
136.	Morgan TROWLAND			X

Laura Higson

From: Mark Williams
Sent: 08 April 2024 13:42
To: Petra Billing
Cc:
Subject: RE: EXTENSION OF NATIONAL HIGHWAYS INJUNCTION - QB-2021-003576 ("the Injunction")

****EXTERNAL****

Petra – thank you for the e-mail and as per your request below, I can confirm my consent to the Third Party Disclosure provisions at paragraph 10 of the draft order on behalf of all the Chief Constables for those forces listed in Schedule 2 to the draft Order.

I trust this is sufficient to proceed.

Regards

Mark Williams

ACC Mark Williams
National Mobilisation Coordinator and NPCC Civil Contingencies Lead



From: Petra Billing
Sent: Friday, April 5, 2024 4:25 PM
To: Mark Williams

Subject: RE: EXTENSION OF NATIONAL HIGHWAYS INJUNCTION - QB-2021-003576 ("the Injunction")

Hi Mark

A revised draft order is attached (with amends shown in mark up) to reflect Owen's retirement for Mark's consent on his return as per my email of earlier.

Many thanks

Petra Billing

Partner & UK Head of
Real Estate Litigation

DLA Piper UK LLP
www.dlapiper.com



Band 1 Chambers
Global: Multi
Jurisdictional Real
Estate

Thomson Reuters
STAND-OUT LAWYER 2023

From:

On Behalf Of Mark Williams

Sent: Friday, April 5, 2024 3:37 PM

To: Petra Billing

Subject: RE: EXTENSION OF NATIONAL HIGHWAYS INJUNCTION - QB-2021-003576 ("the Injunction")

****EXTERNAL****

Petra,

Owen has now retired from policing and ACC Mark Williams is now in that role. He is off today but I will bring this to his attention on Monday and it will be ACC Williams who would consent to this extension on behalf of all Chiefs.

Kind regards,

MJM



From: Petra Billing
Sent: Friday, April 5, 2024 9:50 AM
To:

Subject: EXTENSION OF NATIONAL HIGHWAYS INJUNCTION - QB-2021-003576 ("the Injunction")

Andrew/ Owen

I hope you are both keeping well?

By way of update at a court hearing on 26 April 2024 National Highways are seeking an extension of the Injunction for a further period of 2 years until 23.59 hrs on 10 May 2026.

The draft order that National Highways are seeking is attached by way of service (should service upon you be necessary).

A copy of the application notice, notice of hearing and witness statement with exhibits in support of the application can be found at : [High Court injunction for motorways and major A roads - National Highways](#) (again by way of service, should service upon you be necessary).

The witness statement of Sean Martell evidences why National Highways are seeking an extension to the Injunction.

You will note that in the preamble to the draft order we have assumed that the Police will consent to the extension of the Third party Disclosure order at paragraph 10.

This wording is incorporated in the preamble to the draft order:

“AND UPON the Police Representative Assistant Chief Constable Owen Weatherill 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”

As before we would ask that Owen respond to this email to confirm his consent to the Third Party Disclosure provisions at paragraph 10 of the draft order on behalf of all the Chief Constables for those forces listed in Schedule 2 to the draft Order

We would then adduce this email exchange in evidence before the Court that Own consents to the draft order being made by the Court on behalf of all of the Chief Constables set out in schedule 2 to the draft order, which replicates the previous position under the Injunction.

I shall look forward to hearing from Owen, ideally by Wednesday 10 April 2024.

Warmest regards – and once again thank you on behalf of National Highways for the continued cooperation and support of the Police.

Petra Billing

Partner & UK Head of
Real Estate Litigation

DLA Piper UK LLP
www.dlapiper.com



Band 1 Chambers
Global: Multi
Jurisdictional Real
Estate

Thomson Reuters
STAND-OUT LAWYER 2023

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

Before: [Mr/Mrs Justice]

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 9 OTHERS**

Defendants

DRAFT 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 “**the Cotter Injunction**”)

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

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, [Counsel for the Defendants] [the Defendants in person [and various non-Defendants in person]] at a hearing on 26 April 2024 (“**Review Hearing**”) and also after consideration of submissions lodged by or on behalf of the Claimant [and Defendants]

IT IS ORDERED THAT:

Definitions

1. In this Order, the following defined terms shall apply:

- a. “**Named Defendants**” means D14, D50, D52, D53, D54, 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 Order, namely: D14, D50, D52, D53, D54, 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 Previous Order: *“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 2026 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. Pursuant to CPR r. 6.15, 6.27 and r.81.4, the Claimant is permitted in addition to personal service, where practicable, to serve this Order on each Named Defendant by:
 - a. Placing this Order on the Injunction Website; and
 - b. Electronic means: where a Named Defendant has provided an email address to the Claimant, the Claimant shall serve that Named Defendant with this Order by sending this Order by email to that email address. If necessary due to the size of this Order, the appendices may be served by emailing that Named Defendant with a secure link to a file-sharing platform which hosts the appendices. It is open to any Defendant to contact the Claimant to require postal service instead of electronic means; or
 - c. Post: by posting a copy of this Order through the letterbox of each Named Defendant (or leaving in a separate mailbox) at their last known address, with a notice drawing the recipient's attention to the fact the package contains a Court Order. If the address does not have a letterbox, or mailbox, a package containing this Order may be affixed to or left at the front door or other prominent feature marked with a notice drawing the recipient's attention to the fact that the package contains a court order and should be read urgently. The notices shall be given in prominent lettering in the form set out in Appendix 4. It is open to any Defendant to contact the Claimant to identify an alternative place for service and, if they do so, it is not necessary for a notice or package to be affixed to or left at the front door or other prominent feature; or
 - d. 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.
 - e. 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 paragraphs 7 and 8, 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)(Assistant Chief Constable Owen Weatherill having retired) , 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. This Order will be reconsidered at a hearing to be listed by the Court in April 2026 on a half day estimate 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 24 May 2026. It will be the Claimant's responsibility to arrange such a hearing and to place details of any such hearing on the Injunction Website. No further application shall be required, and the Court will issue a notice of hearing on notification by the Claimant.
16. 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 20 below 48 hours before making such application of the nature of such application and the basis for it.
17. 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.
18. The Claimant has liberty to apply to extend, vary or discharge this Order, or for further directions.

Costs

19. There be no order as to costs

Communications with the Claimant

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

DLA Piper UK LLP

Attention: Petra Billing and Rob Shaw

1 St. Paul's Place

Sheffield

S1 2JX

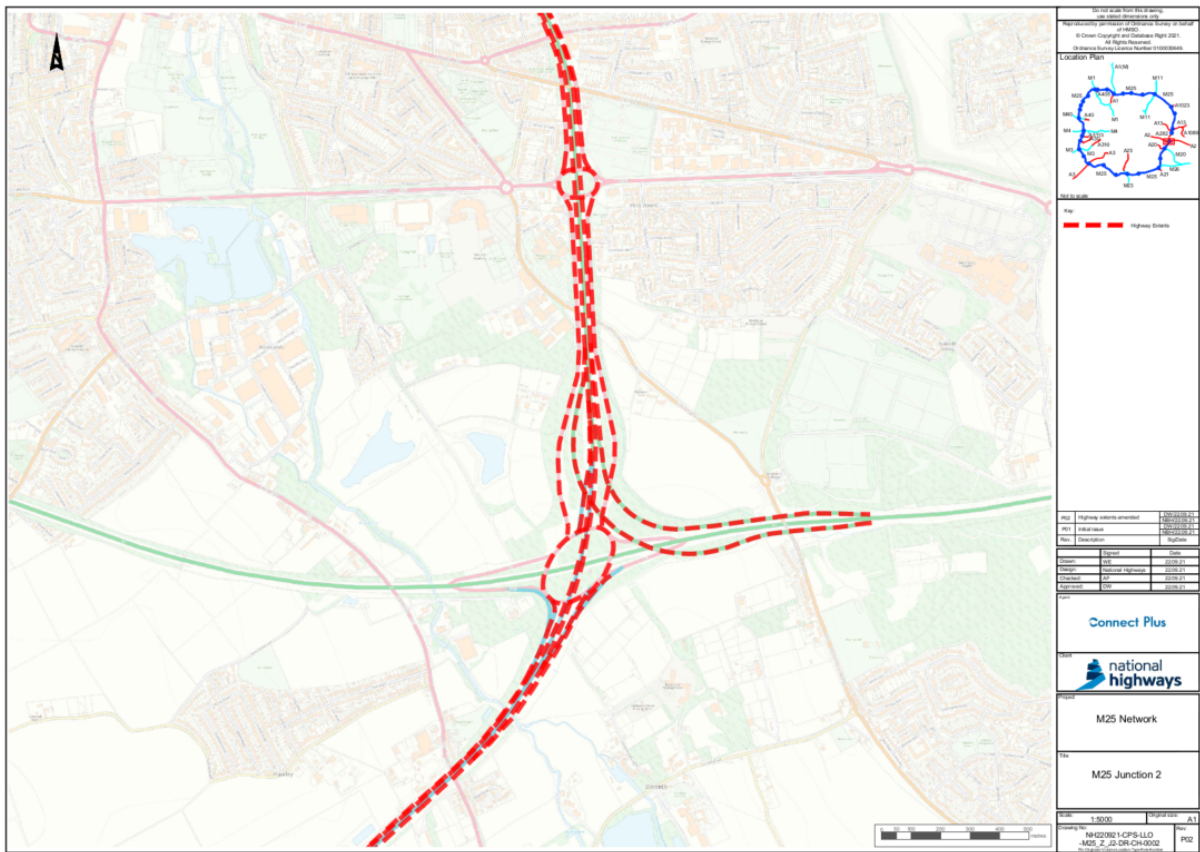
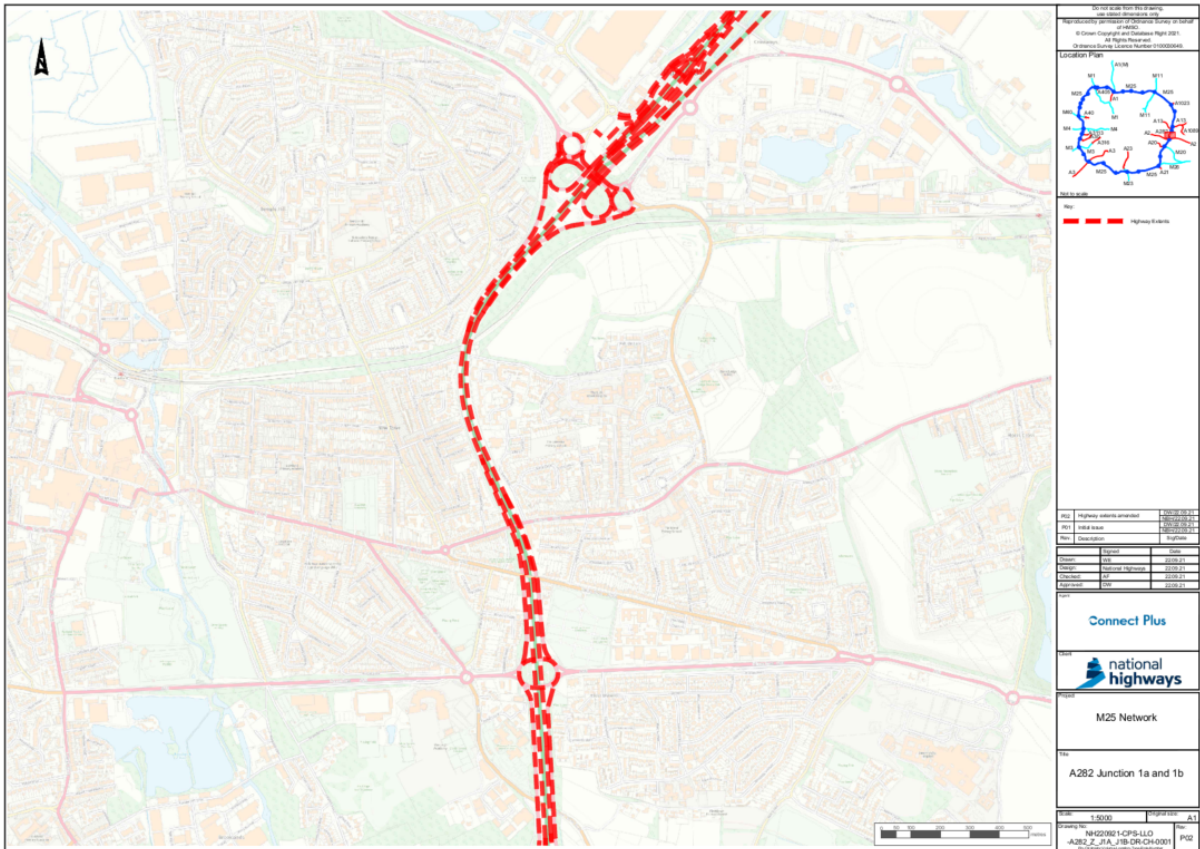
E: petra.billing@dlapiper.com and rob.shaw@dlapiper.com

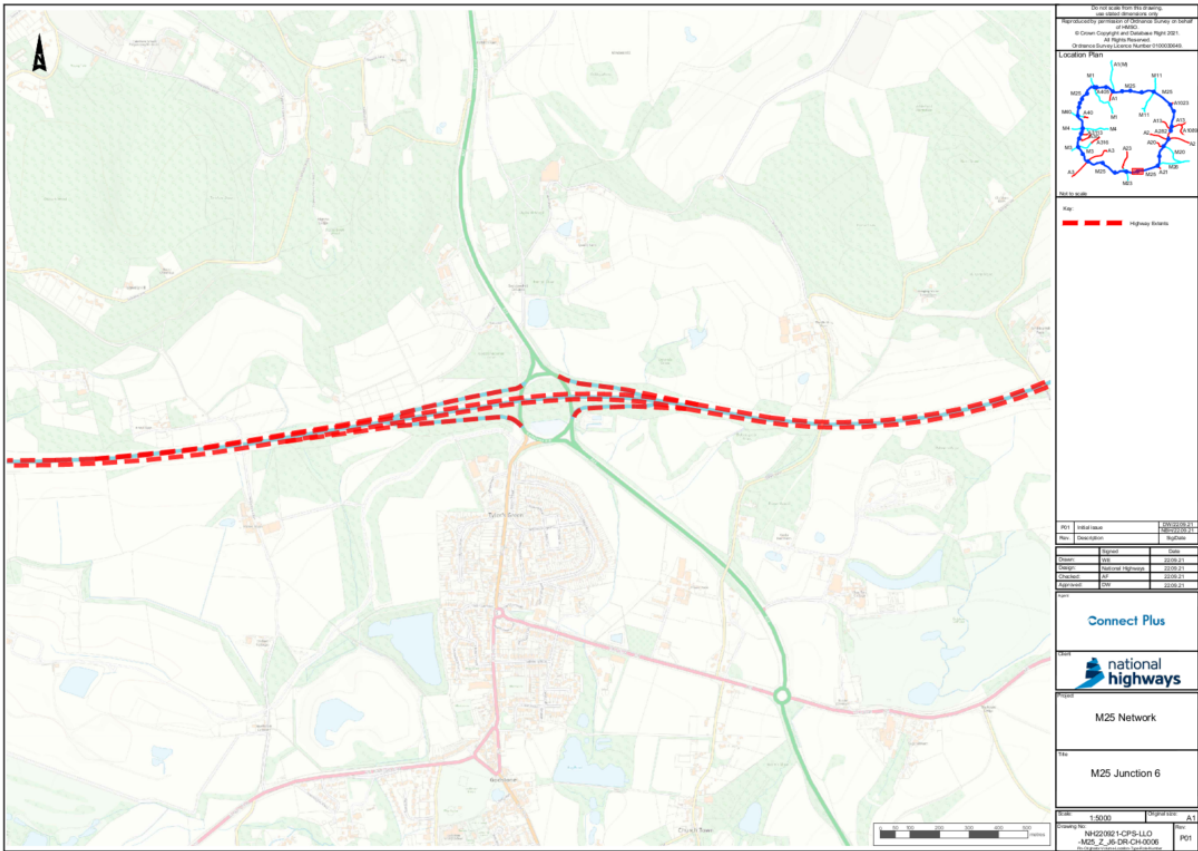
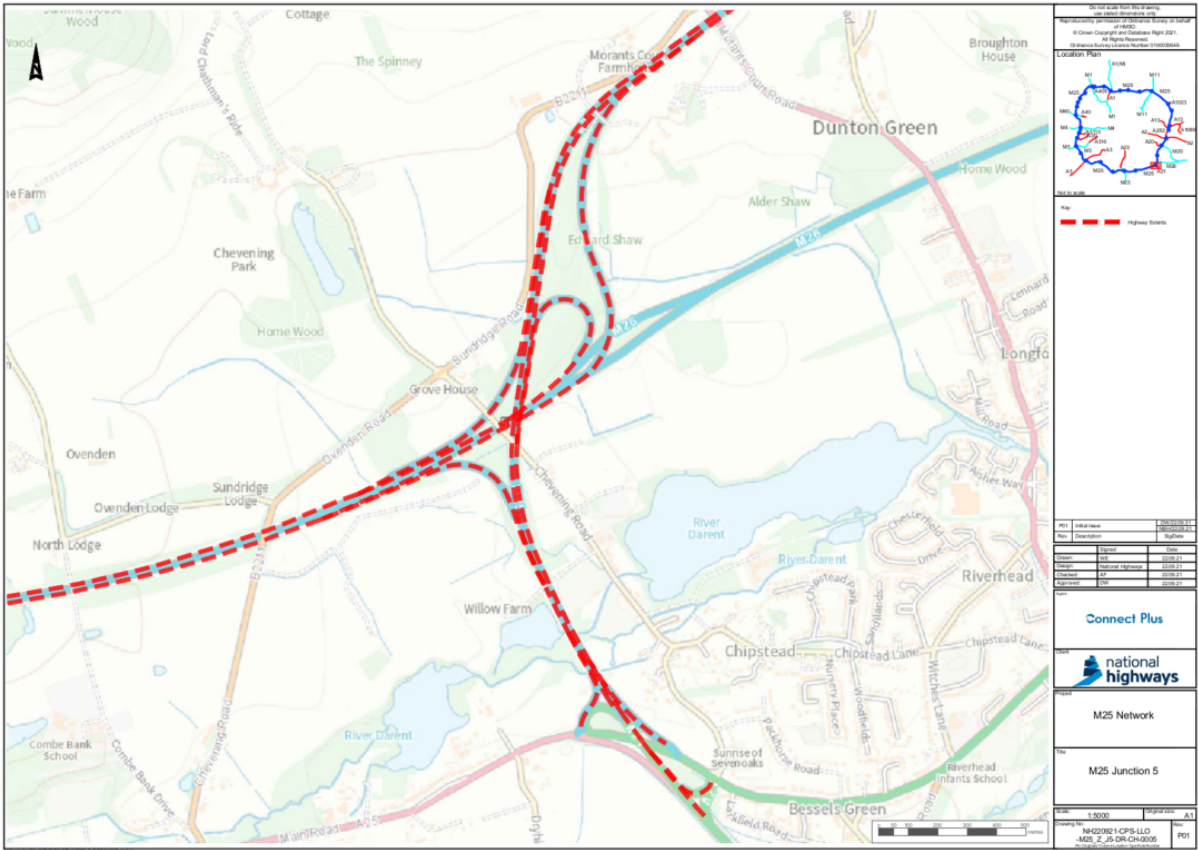
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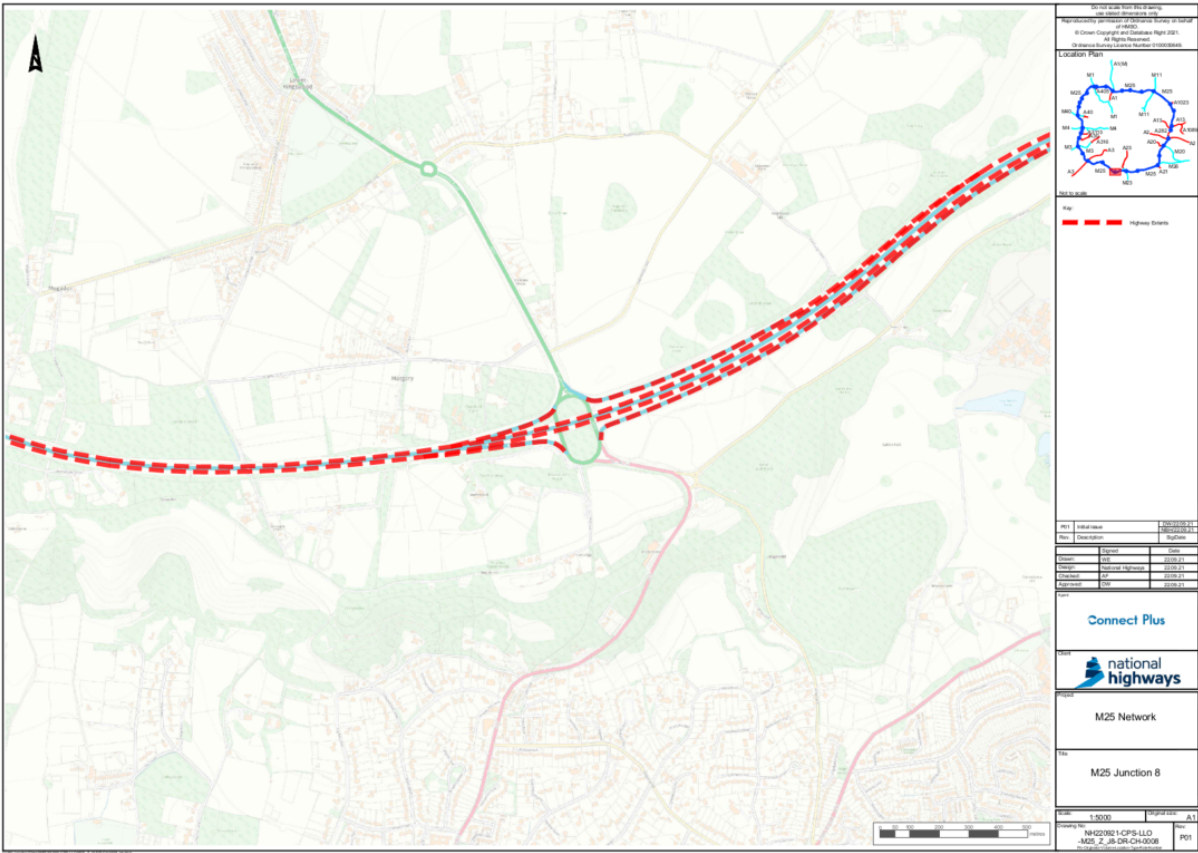
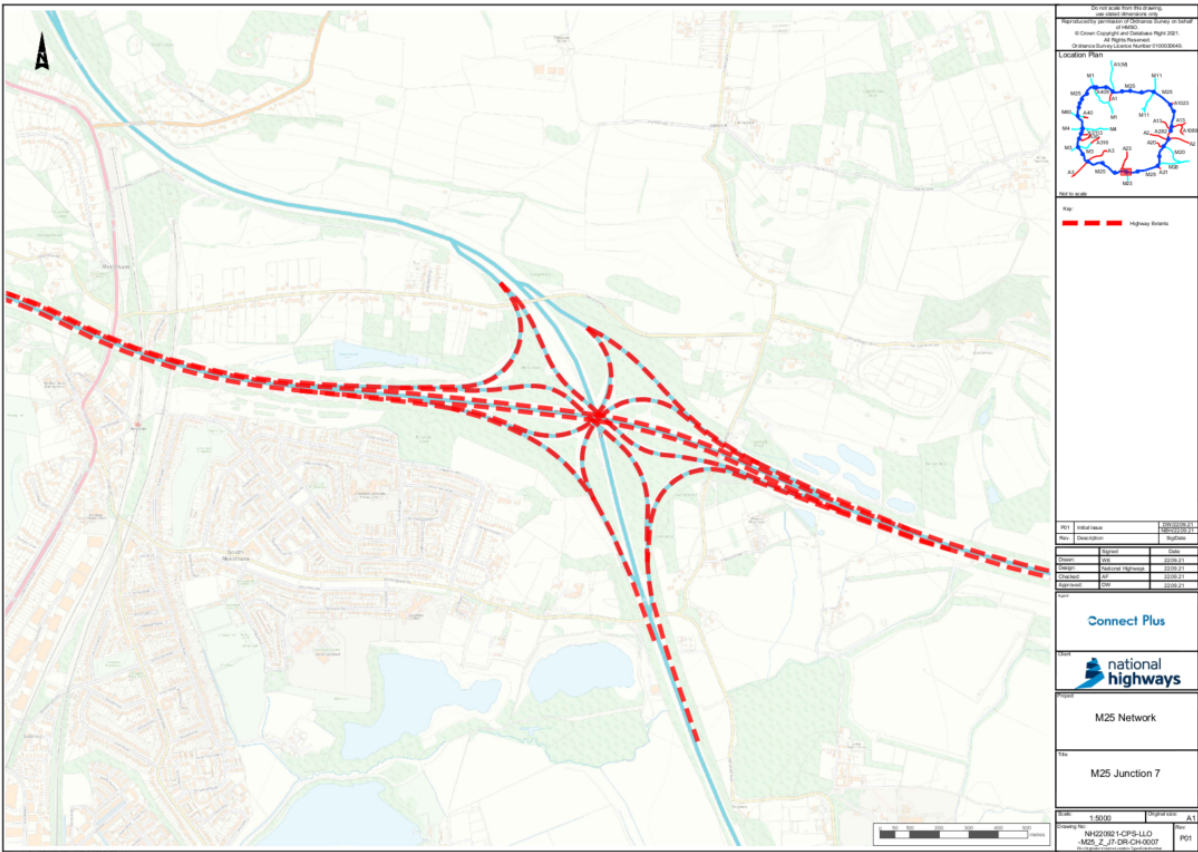
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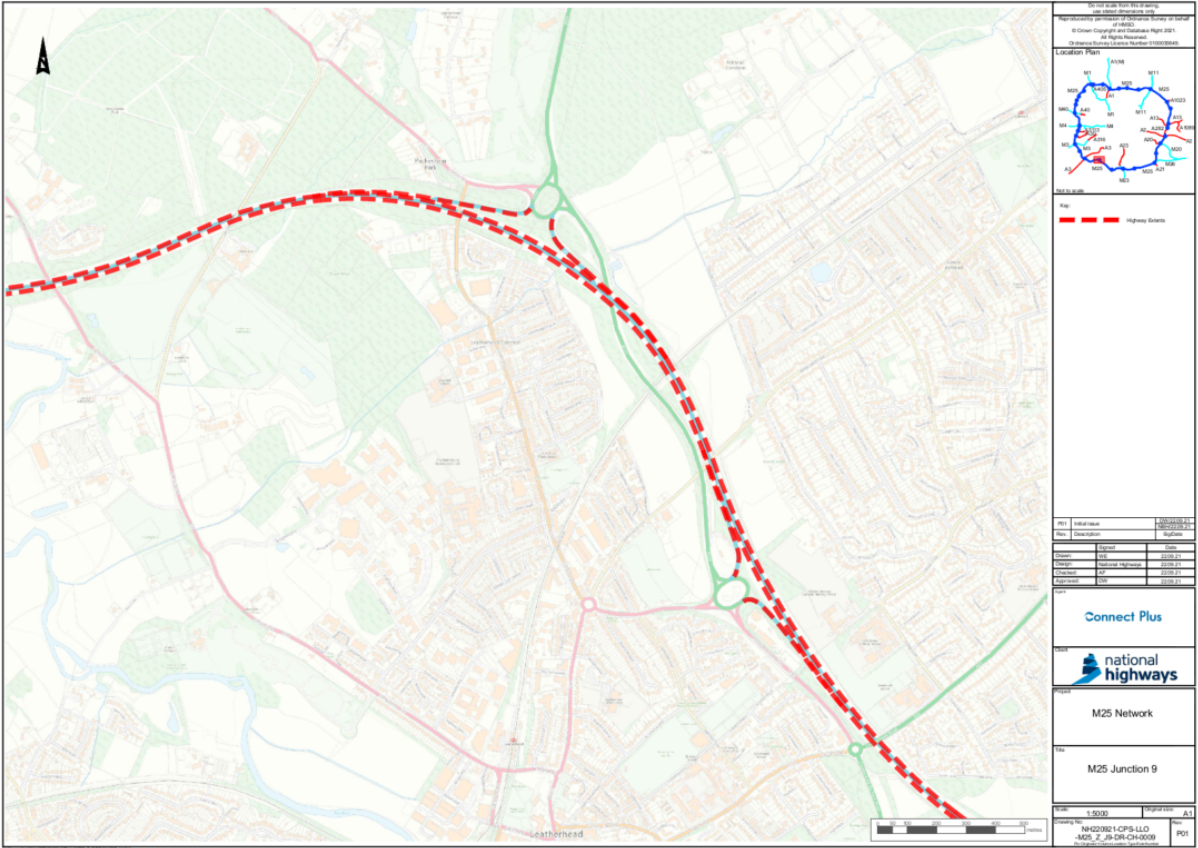
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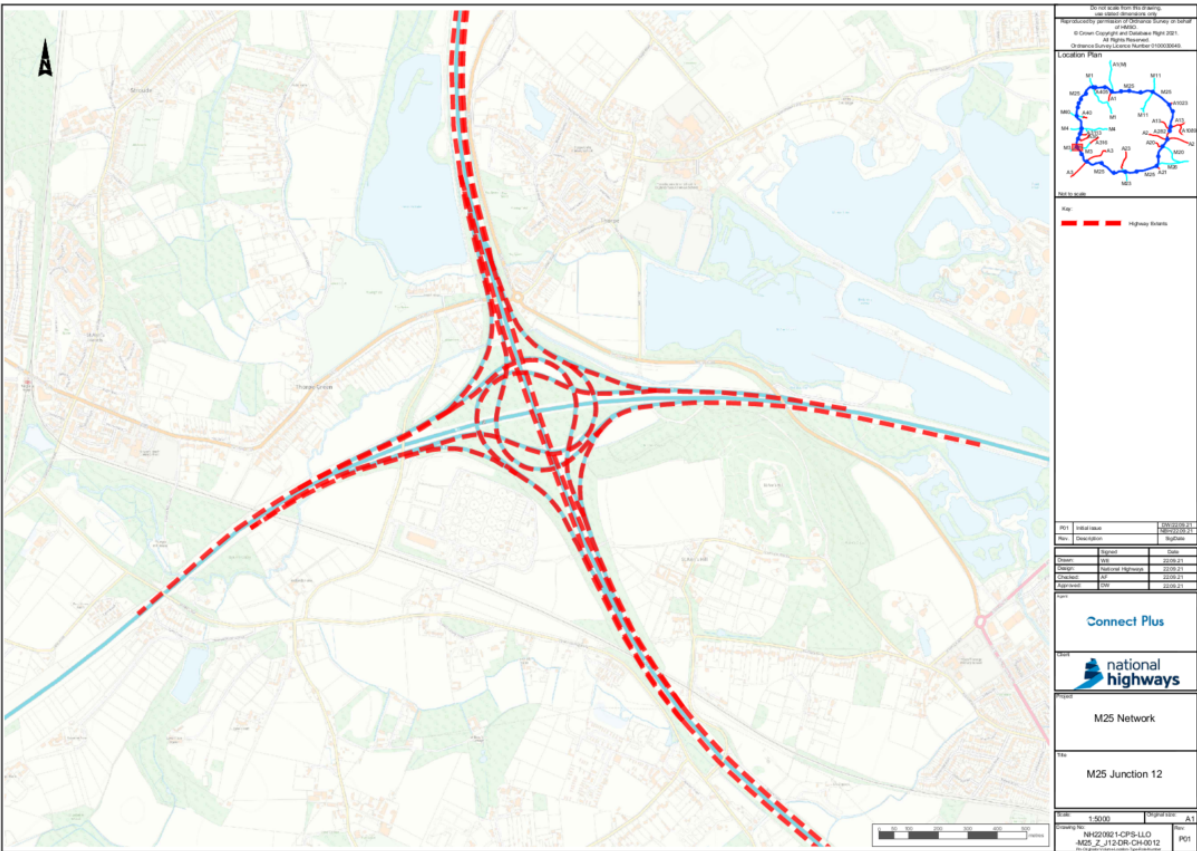
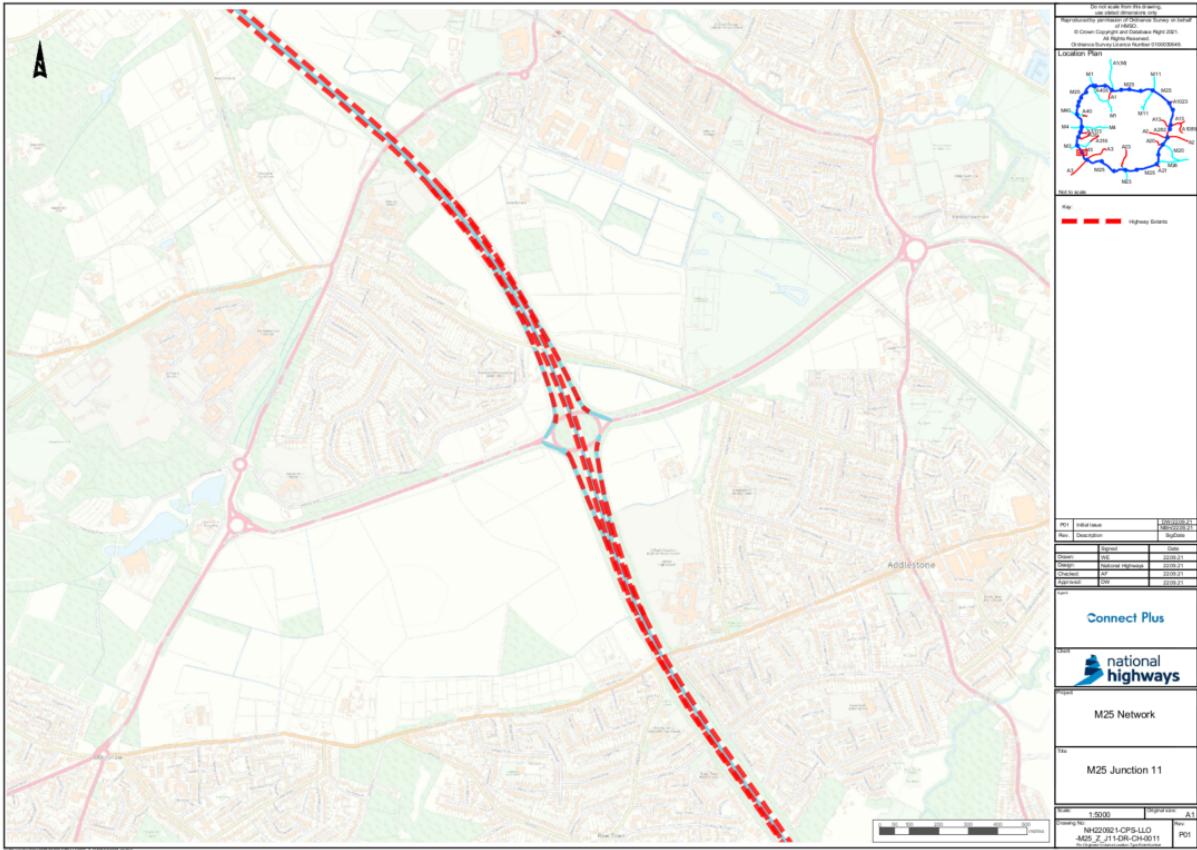
APPENDIX 1

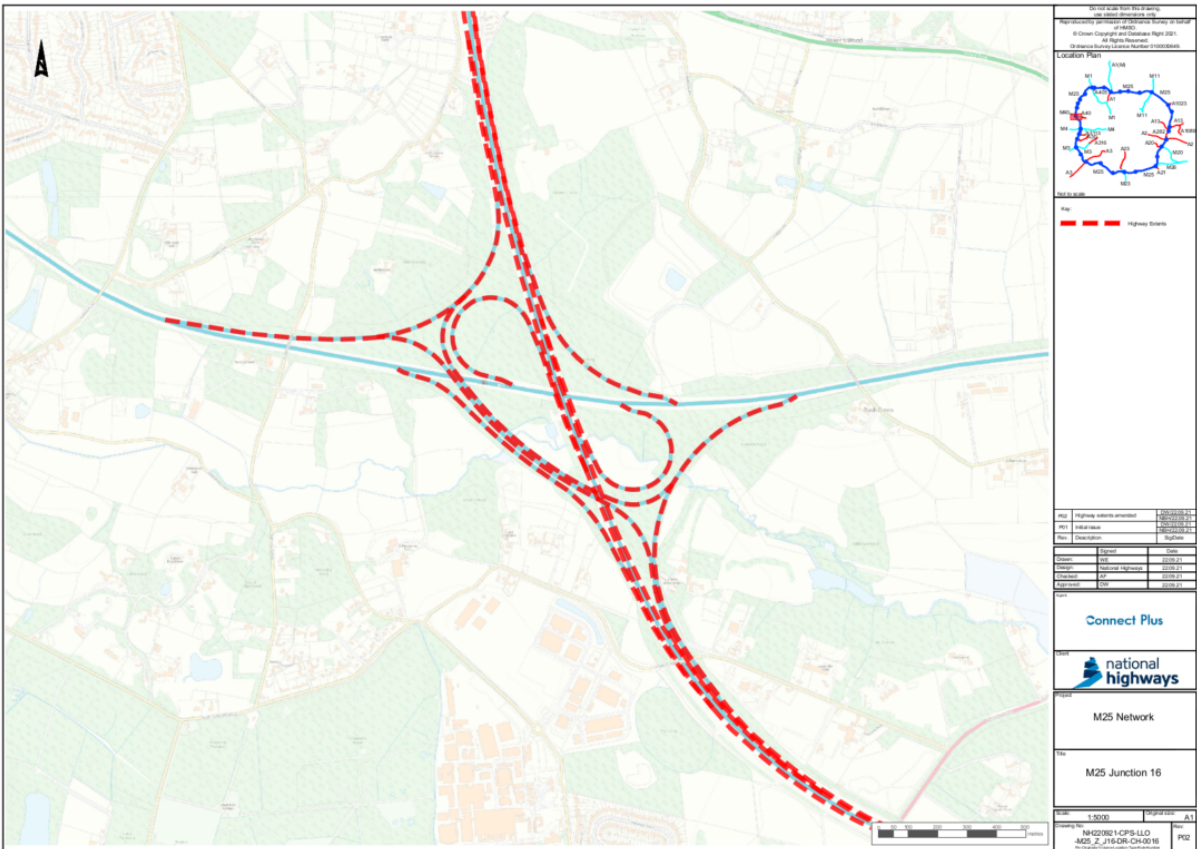
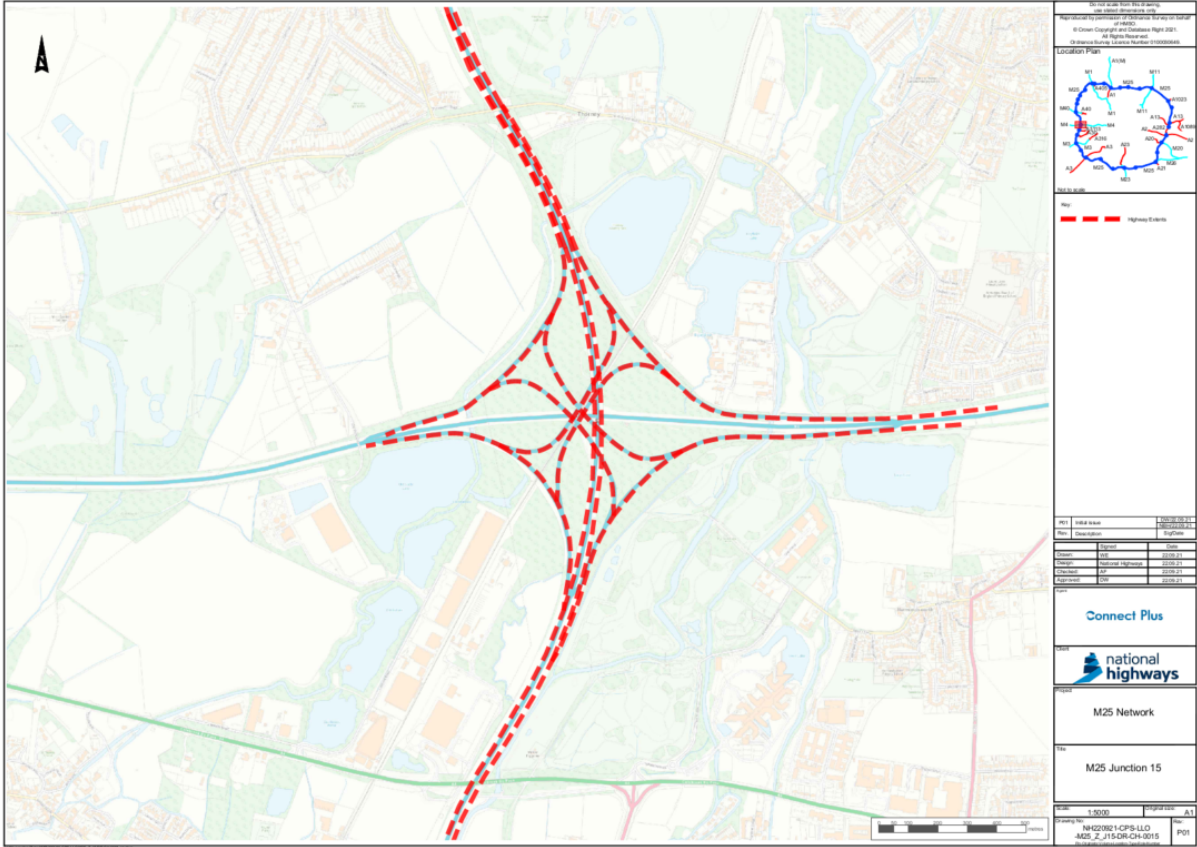


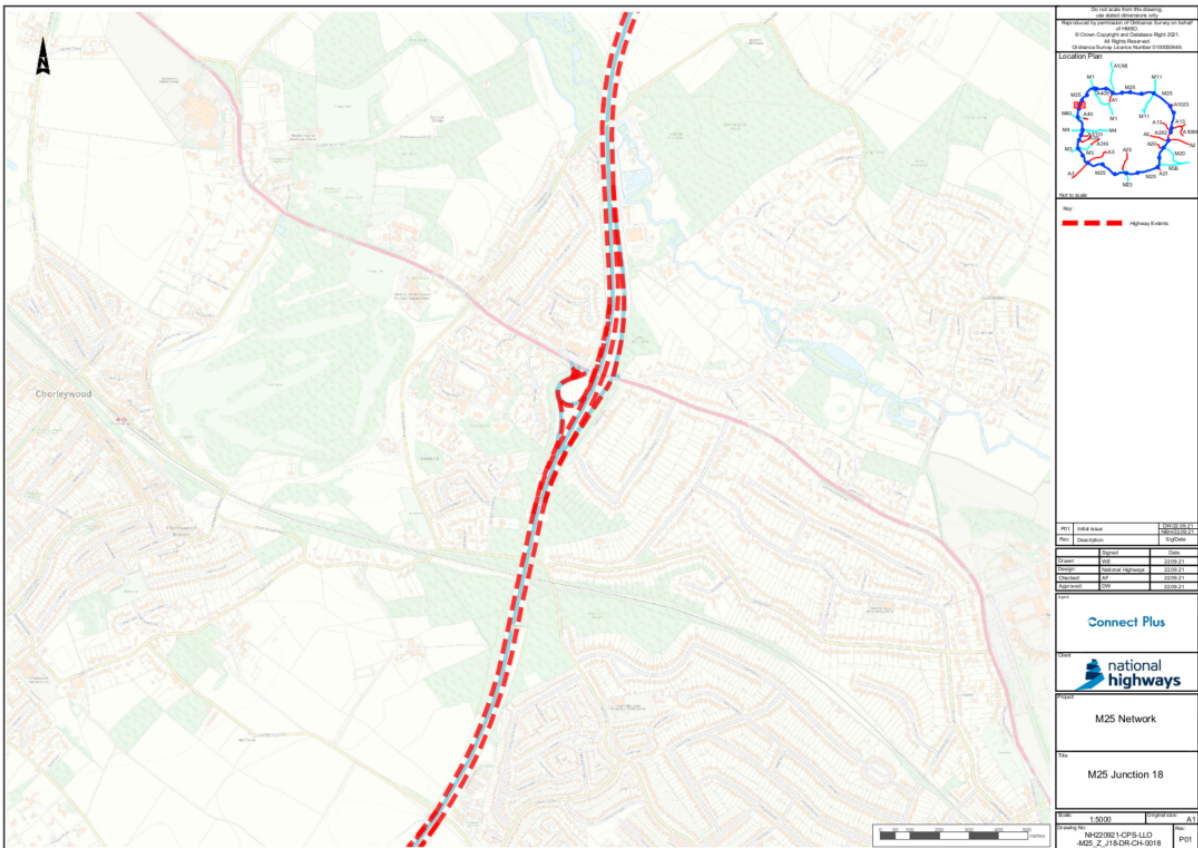
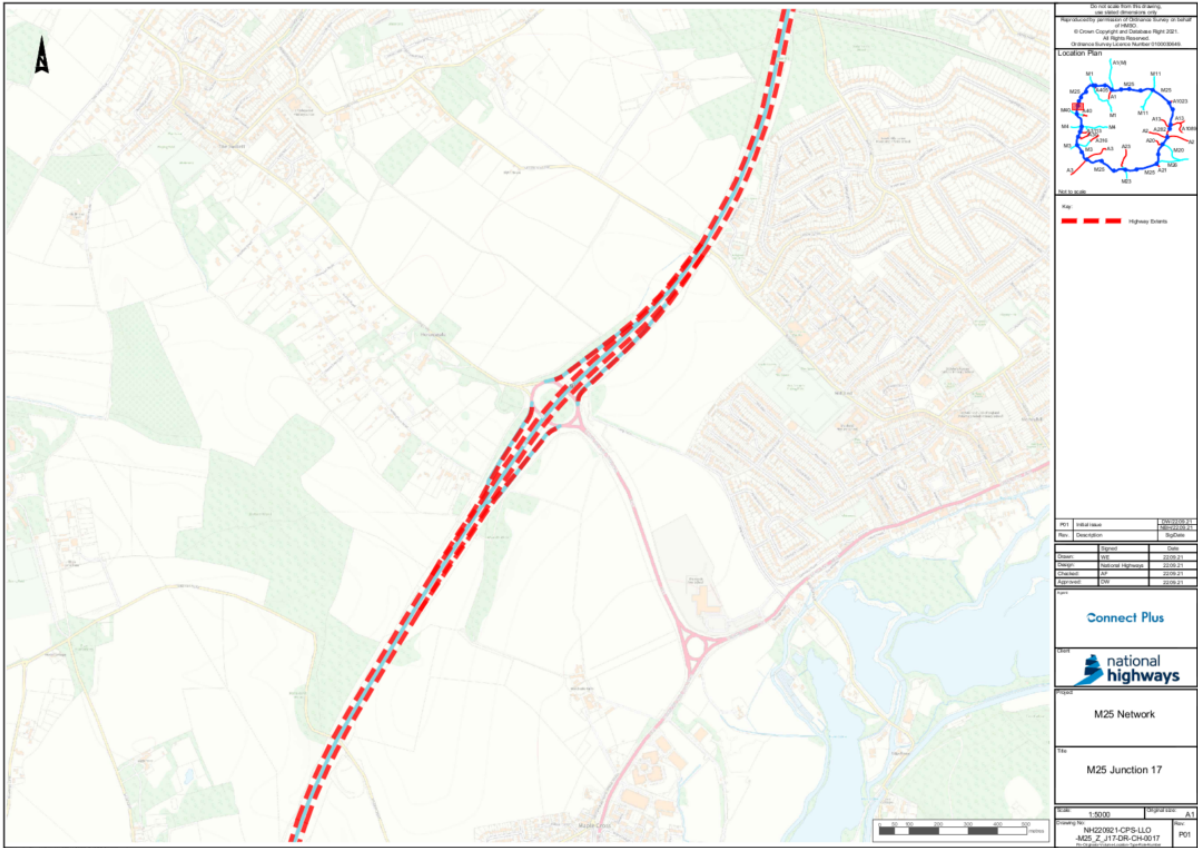


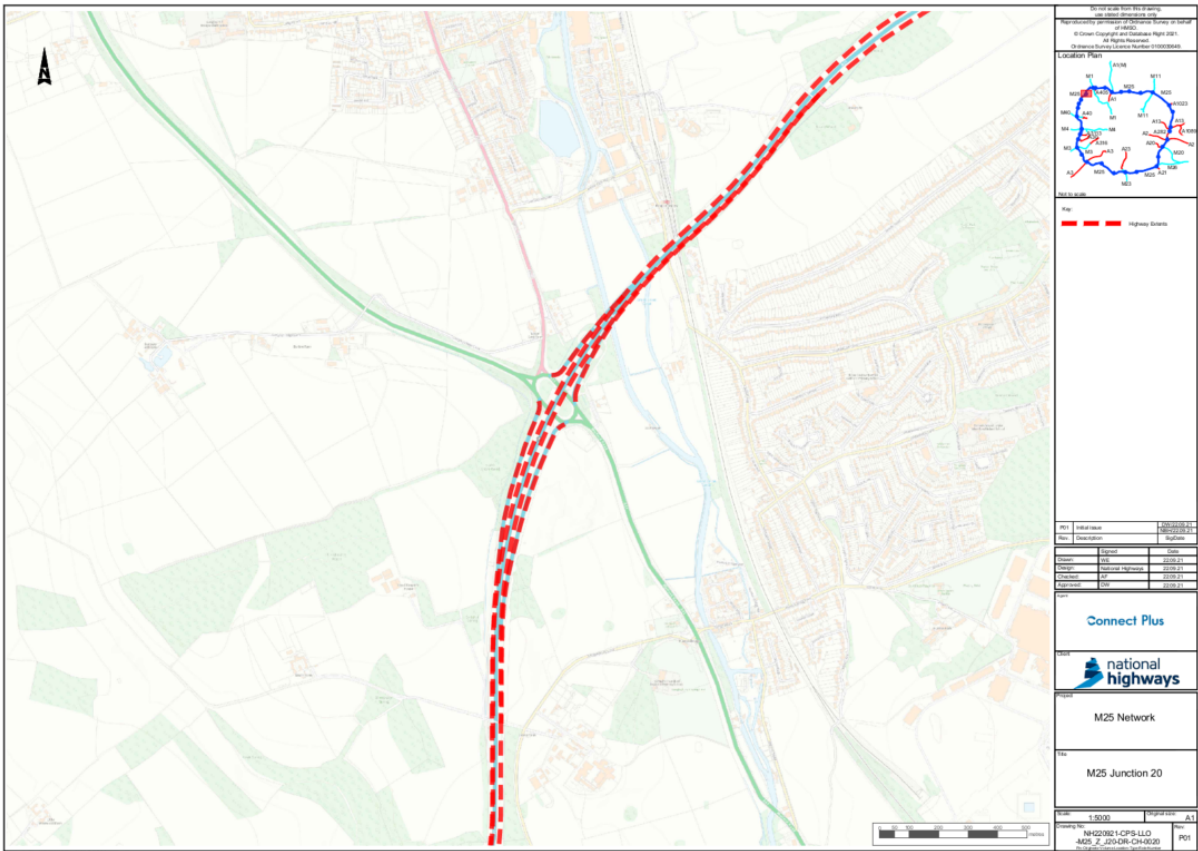
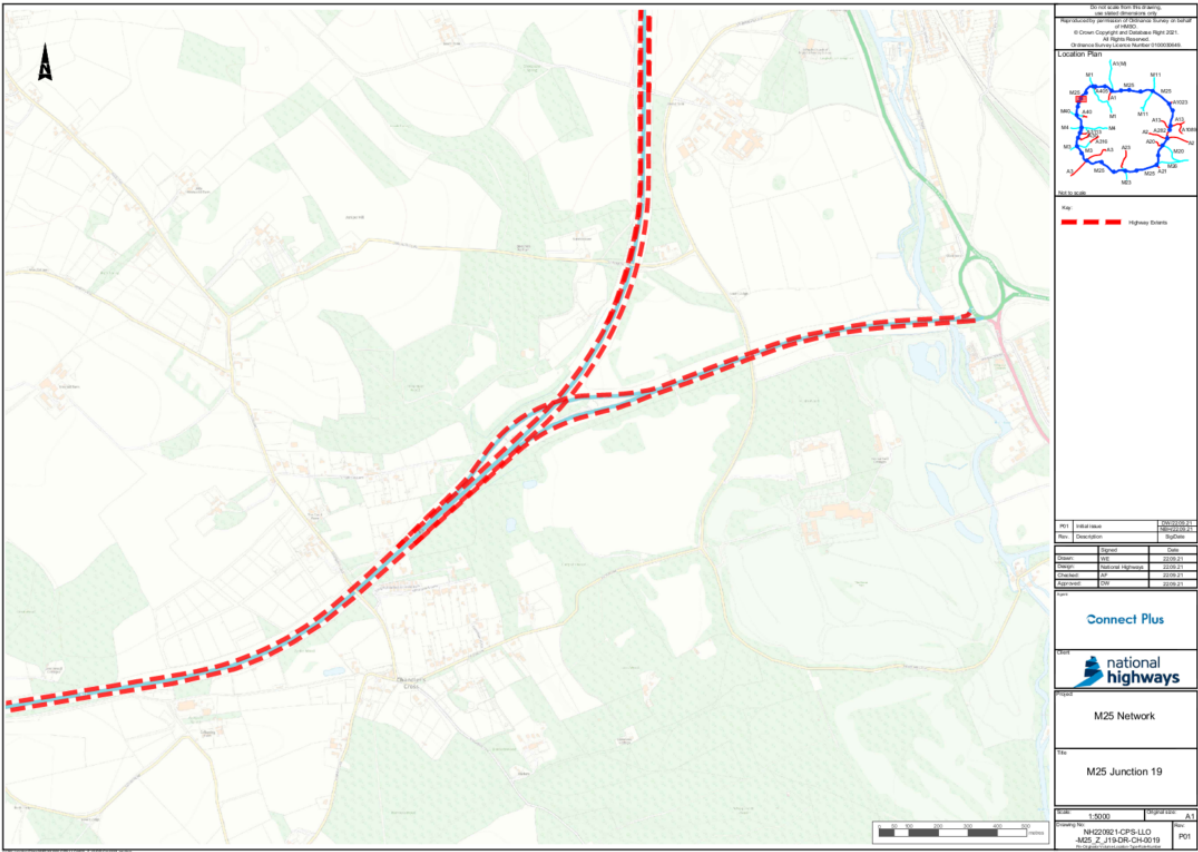


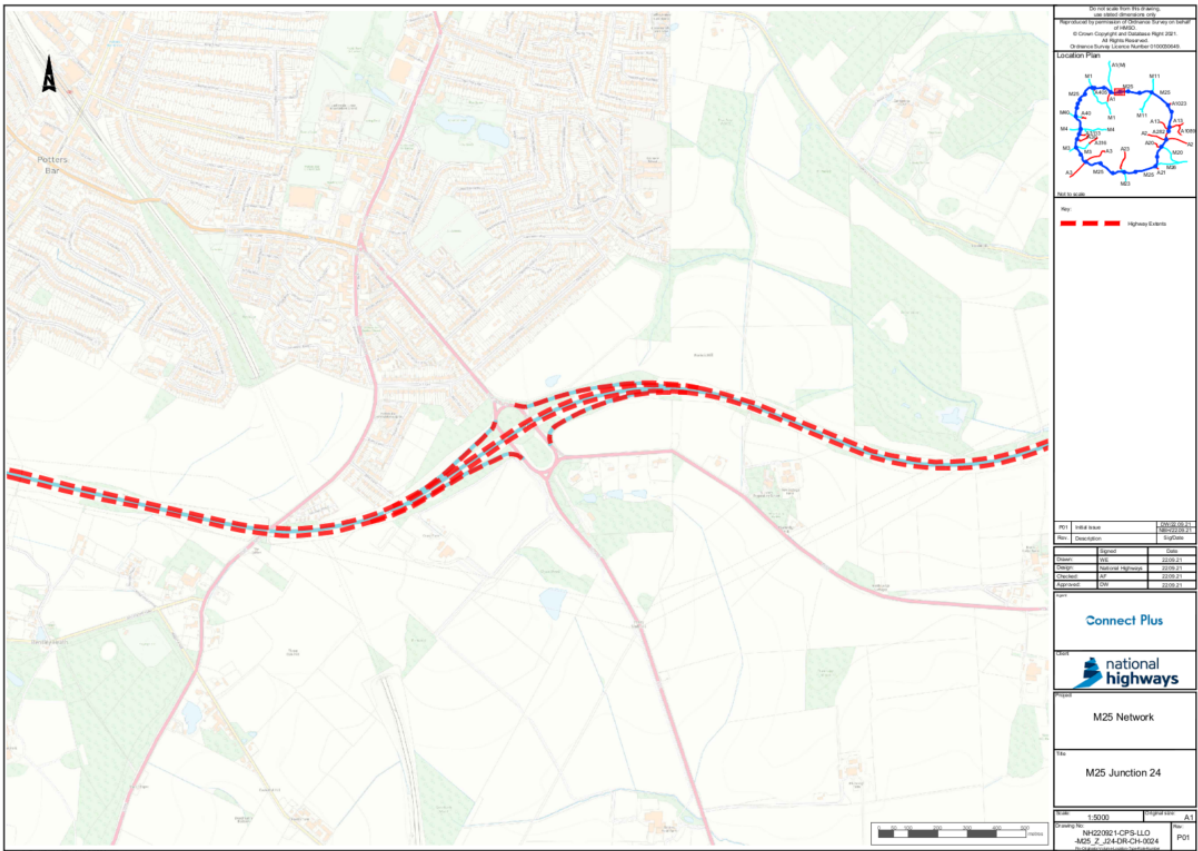
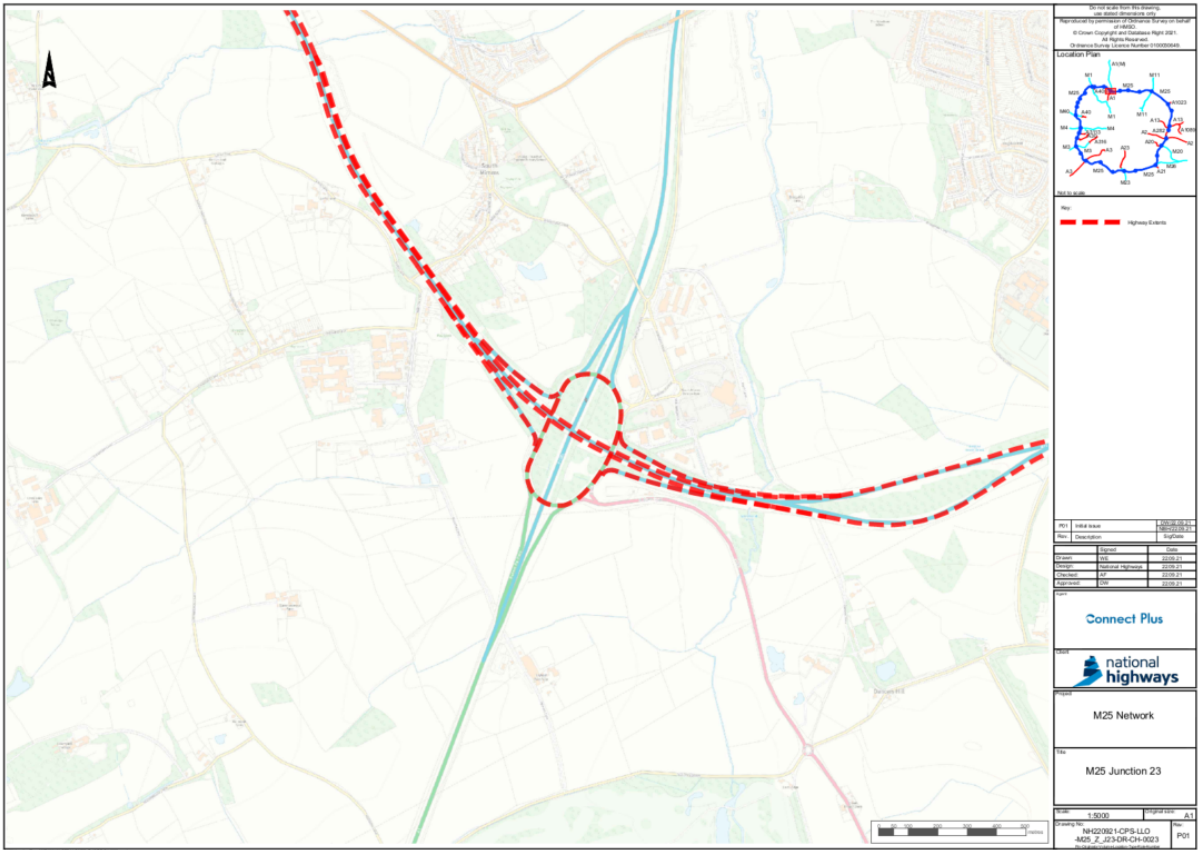


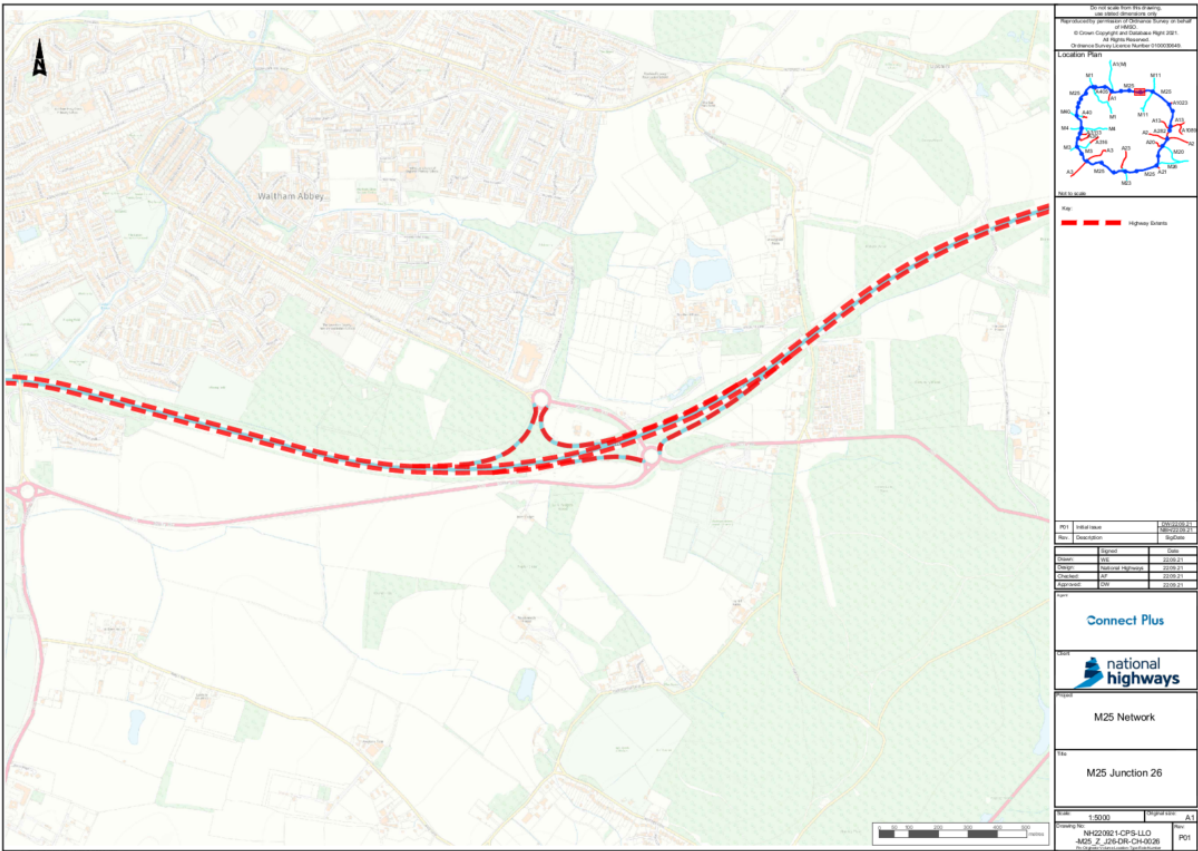
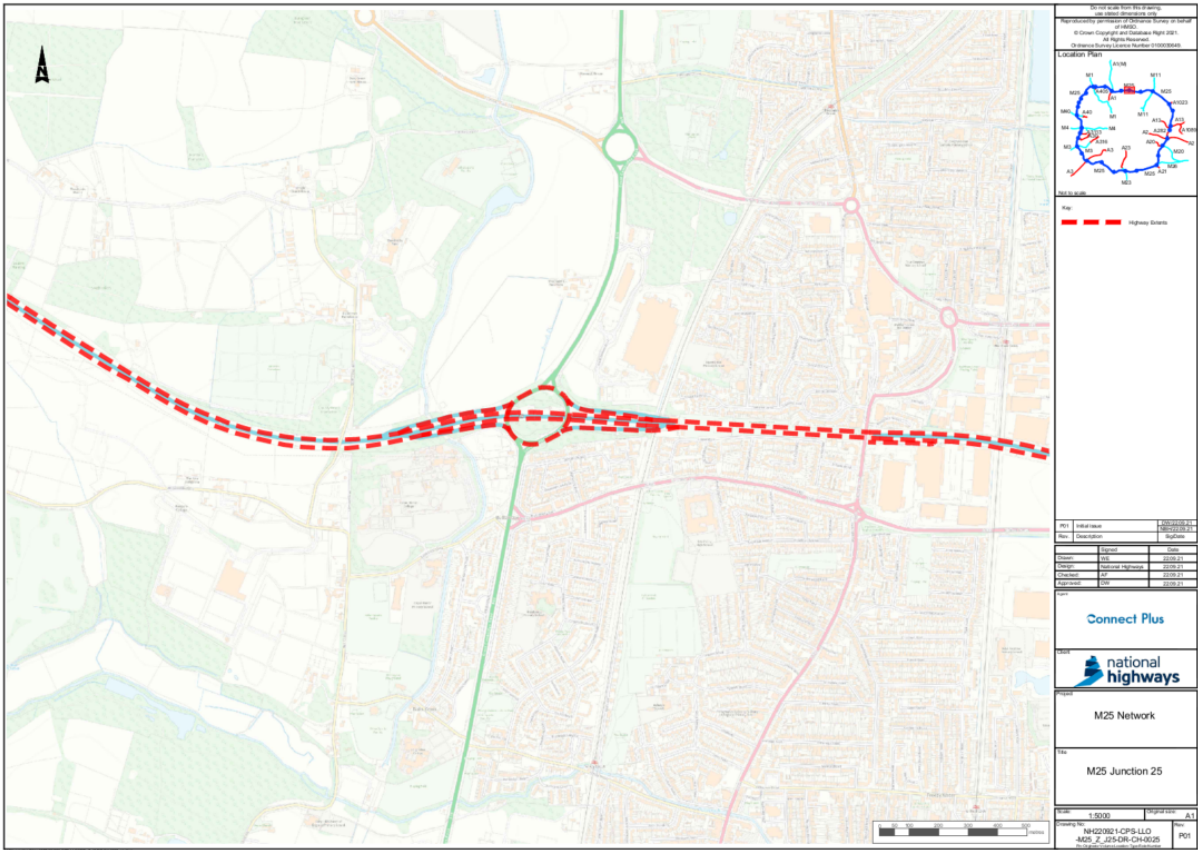


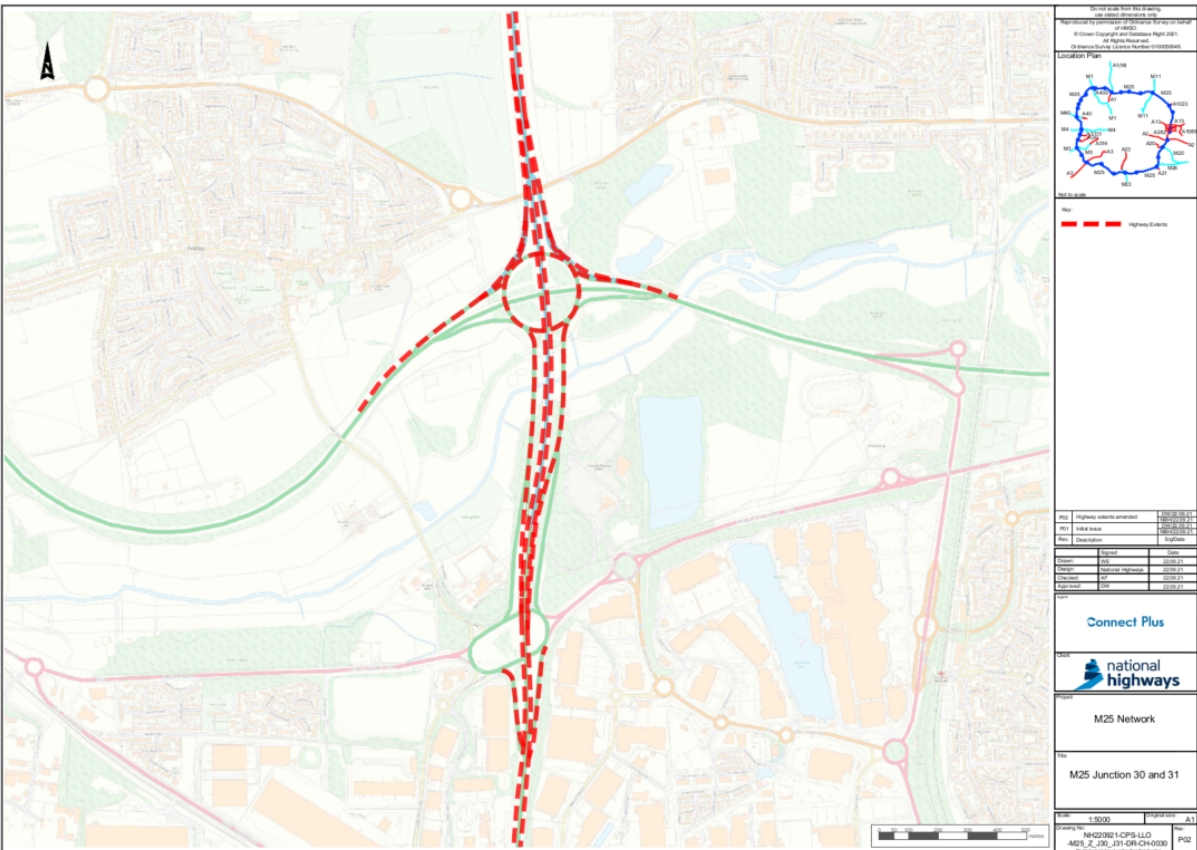
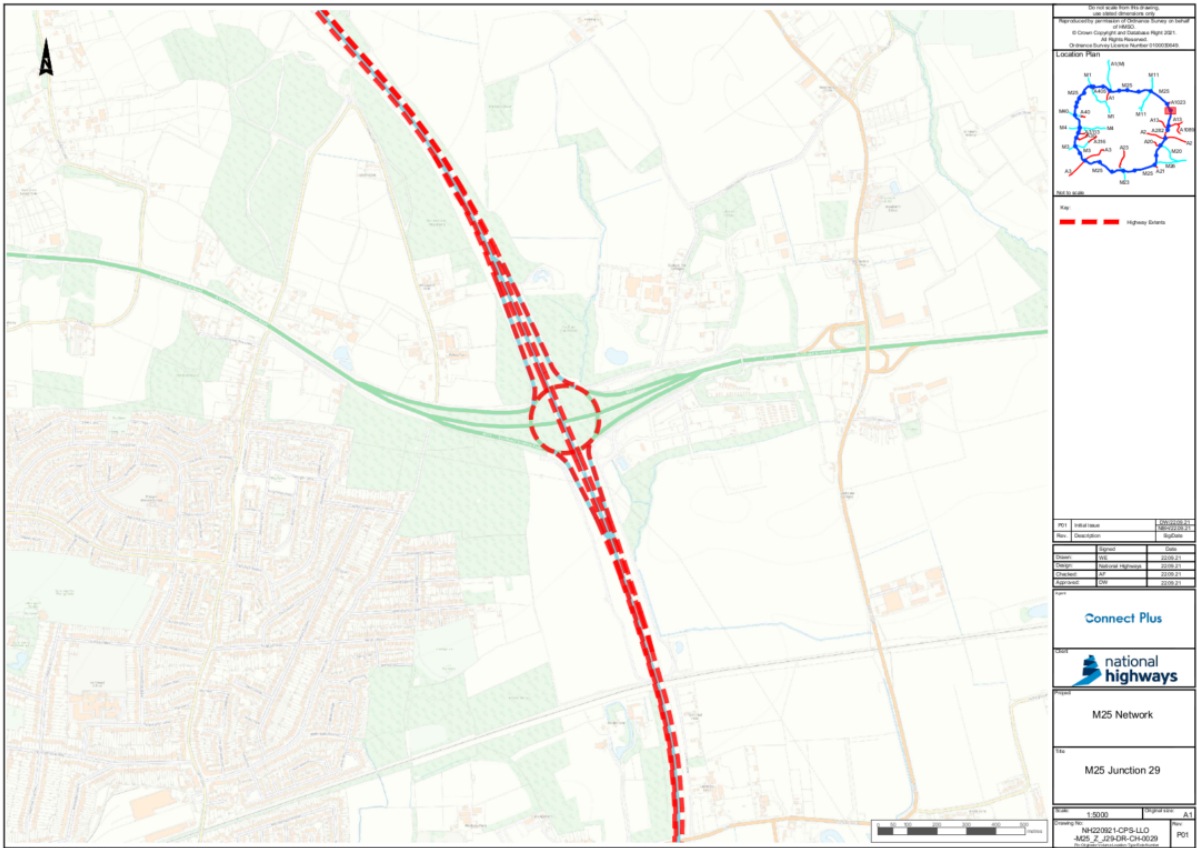






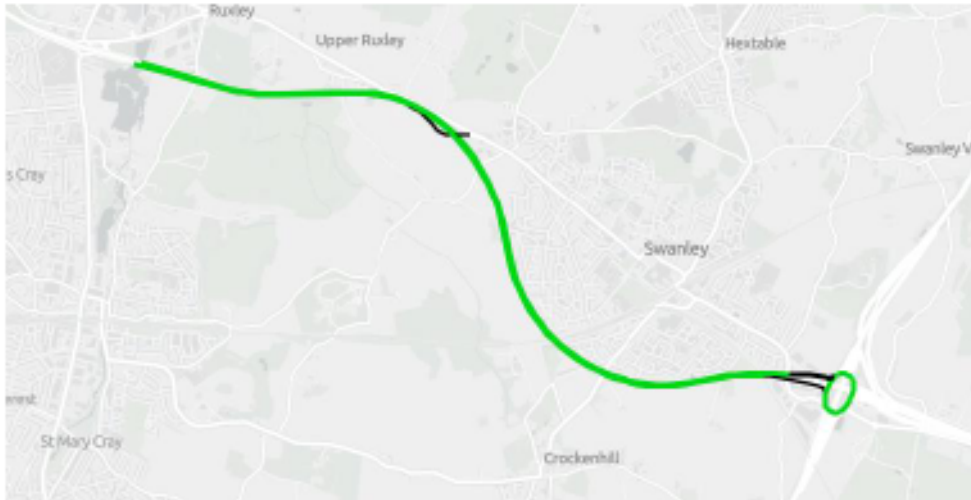






APPENDIX 2

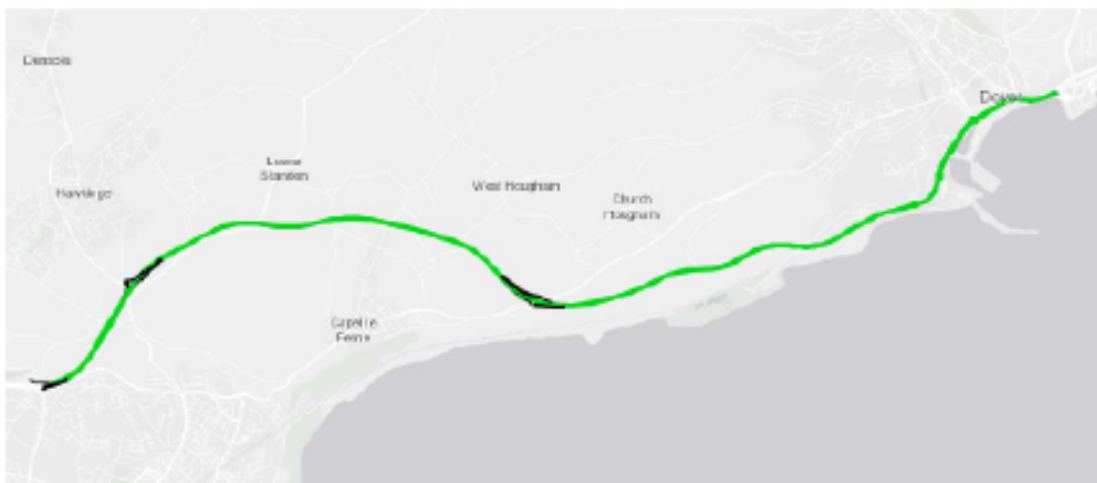
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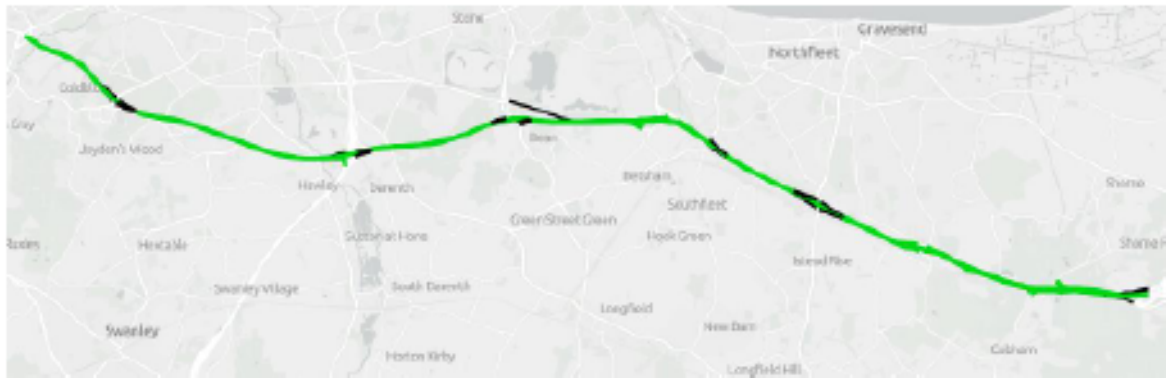
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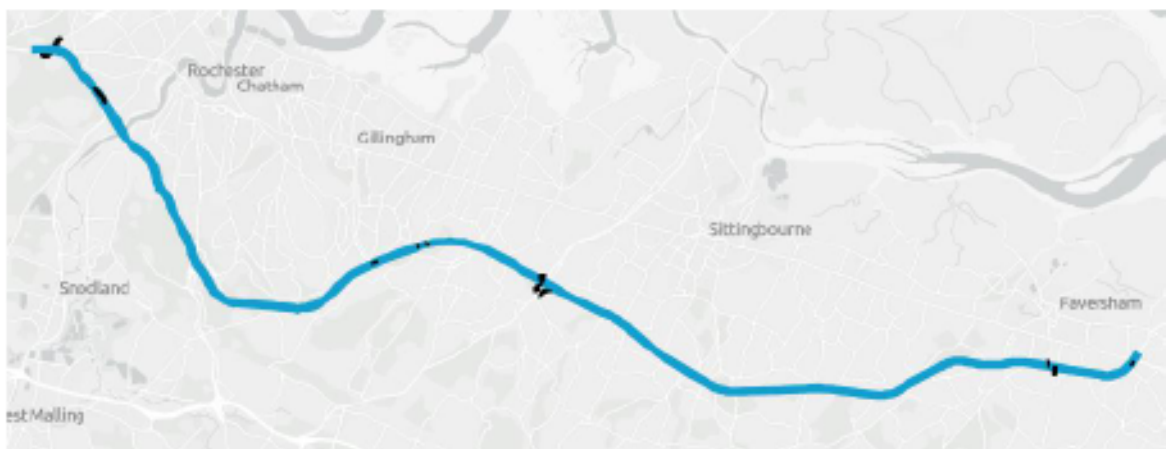
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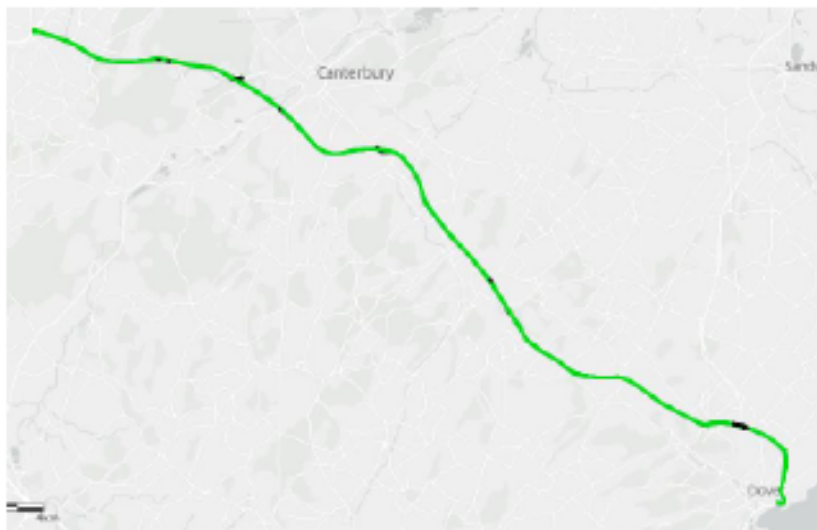
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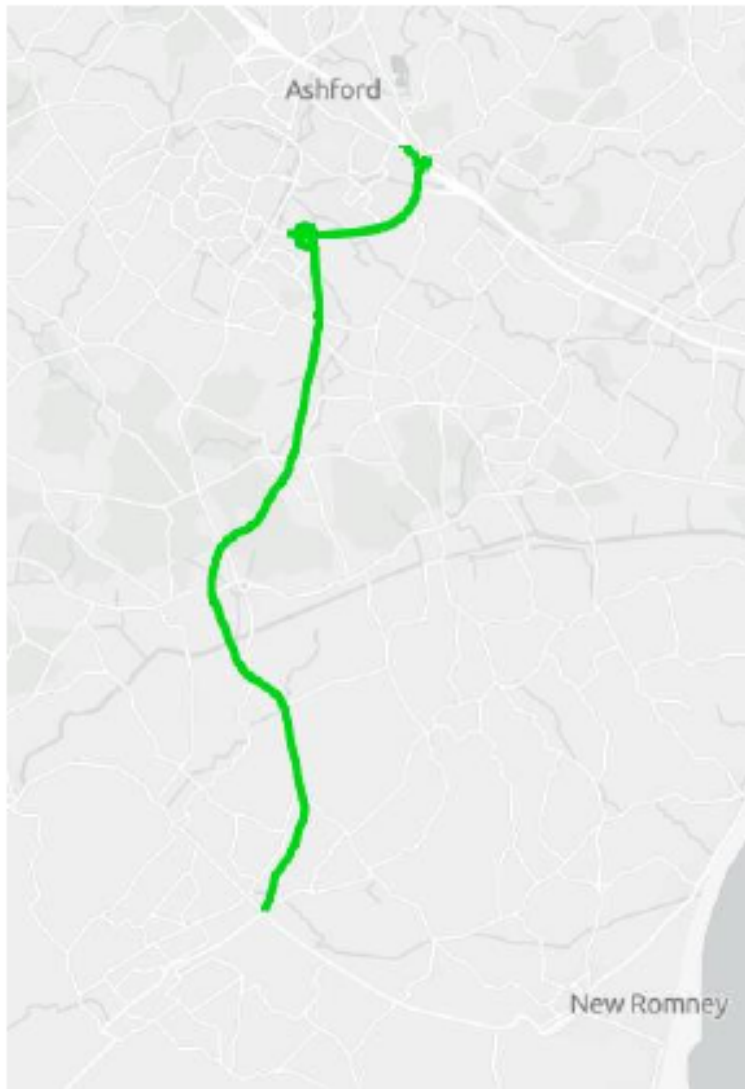
M2



A2 M2 - Dover Section



A2070

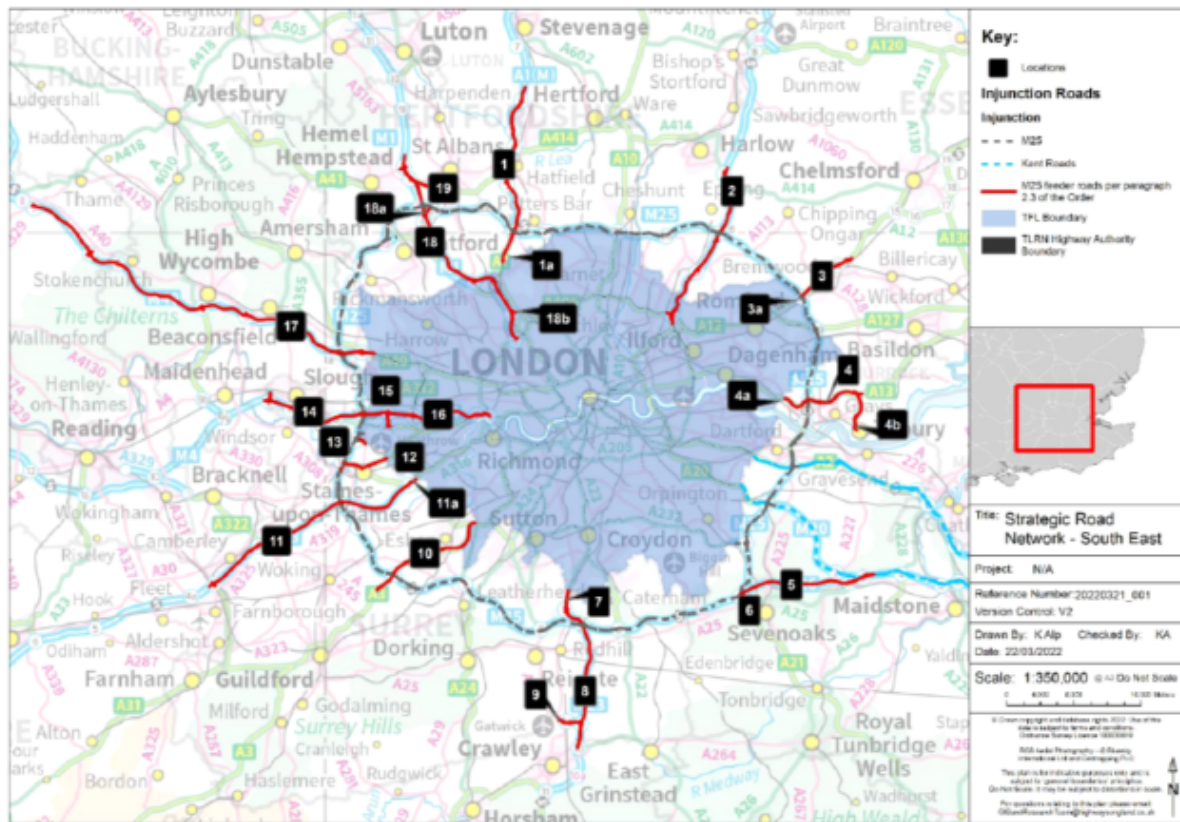


Kent & Surrounding areas SRN



APPENDIX 3

Strategic Road Network – South East



1. A1(M) from Junction 1 to Junction 6

1a. A1 from A1(M) to Rowley Lane

2. M11 from Junction 4 to Junction 7

3. A12 from M25 Junction 28 to A12 Junction 12

3a. A1023 (Brook Street) from M25 Junction 28 roundabout to Brook Street Shell Petrol Station access

4. A13 from M25 Junction 30 to junction with A1089

4a. A13 from junction with A1306 for Wennington to M25 Junction 30

4b. A1089 from junction with A13 to Port of Tilbury entrance

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

APPENDIX 4

[On the package containing the Injunction]

“VERY URGENT: THIS PACKAGE CONTAINS AN ORDER OF THE HIGH COURT AND YOU SHOULD READ IT IMMEDIATELY AND SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE EMAIL NH-INJUNCTIONS@DLAPIPER.COM”

[To affix to front door when the package has been posted through the letterbox or placed in a mailbox]

“VERY URGENT: A PACKAGE HAS BEEN LEFT THAT CONTAINS AN ORDER OF THE HIGH COURT AND YOU SHOULD READ IT IMMEDIATELY AND SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE EMAIL: NH-INJUNCTIONS@DLAPIPER.COM”

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	
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51.	Not used	
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53.	Liam NORTON	
54.	Louis MCKECHNIE	
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104.	Tracey MALLAGHAN	

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136.	Morgan TROWLAND	
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140.	Not used	

SCHEDULE 2

CHIEF CONSTABLES OF THE FORCES OF:

City of London Police

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Now the hundreds of Just Stop Oil's 'youth wing' plots chaos on Tube network in co-ordinated attacks that could cripple the network

By Isaac Crowson
00:05 07 Apr 2024, updated 01:54 07 Apr 2024



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Hundreds of young eco-zealots and pro-Palestine activists are plotting to wreak havoc on the [London Underground](#) this week, The Mail on Sunday has revealed.

In a bid to cripple the network, the co-ordinated attacks would see them flood into central Tube stations and block train carriages, causing chaos for commuters and tourists.

In an echo of the environmental protests which block major roads, many of those involved are willing to remain in place until arrested and hauled away by police.

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The plans for tomorrow and Wednesday were unveiled last week in an online meeting of Youth Demand, a new wing of [Just Stop Oil](#) (JSO) which was infiltrated by an undercover MoS reporter.

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Hundreds of young eco-zealots and pro-Palestine activists are plotting to wreak havoc on the London Underground this week, The Mail on Sunday has revealed.

The plans for tomorrow and Wednesday were unveiled last week in an online meeting of Youth Demand, a new wing of JSO which was infiltrated by an undercover MoS reporter (pictured)

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Its leader, Pippa Cowtan, 21, a London-based politics graduate, told activists they were targeting the public transport system because police have cracked down on protesters blocking roads.

READ MORE: Eco militants' sinister new manual: Scan 'clapping for carers' photos to track down MPs' homes, Just Stop Oil tells its zealots

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She said those involved should meet at Victoria Embankment Gardens before descending on Tube stations en masse.

'For those who will be getting arrested, that will be happening around 2pm to 2.30pm,' Ms Cowtan said. 'On Wednesday, again we're going to be marching. Arrests 2pm to 2.30pm.'

Ms Cowtan said the group would be willing to call off the Tube chaos if police allowed them to march on the roads instead.

'We don't want people getting arrested who don't want to be arrested,' she said. 'If the police are willing to facilitate us marching on the roads then we will march on the roads.'

With a smirk, she added: 'So for any police officers who might be listening, if you want to let us march on the road to avoid hundreds of people getting on the Tube, that would be brilliant.'

Politicians called on police to use the full force of the law against the mob. Tory MP Nigel Mills said: 'This is disgraceful. They are holding the police to ransom.'

'It's essentially blackmail. The police should not heed any of these pathetic demands and take firm action against any law breakers.'

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The group's leaders have said they are plotting a 'political revolution' to target the super-rich and bring down capitalism, rather than tackling climate issues

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The Daily Mail newspaper previously revealed a sinister plot by JSO to 'occupy' MPs' homes and plans to target airports this summer.

READ MORE: [Just Stop Oil's secret plot to 'occupy the homes of MPs' as eco zealots aim to SABOTAGE the election and cause nationwide chaos](#)

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The group's leaders have said they are plotting a 'political revolution' to target the super-rich and bring down capitalism, rather than tackling climate issues.

JSO has joined forces with ultra-Left groups and pro-Palestinian protesters. Activists cited Lenin at a meeting last month as they pledged to fight the 'ruling class' by breaking out of the 'climate movement bubble'.

They announced plans to occupy banks and orchestrate rent strikes, in which tenants would refuse to pay landlords.

They will also back candidates at the next general election and have said they plan to start a new system of government to take over when the current one 'fails'.

Metropolitan Police Chief Inspector Dominic Nye said: 'We are working with British Transport Police and Transport For London on a robust policing plan to minimise disruption. Despite meeting

with us earlier this year, they [JSO] have not engaged with us. Officers will use a full range of powers.'

TFL

Just Stop Oil

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MOST READ NEWS



Just Stop Oil announce new corporate sponsorship deal with Gorilla Glue

Press / April 1, 2024

Just Stop Oil has entered into partnership with Gorilla Glue– the American adhesive manufacturer. Just Stop Oil has been taking action since 2022, demanding that both Labour and Tories commit to revoking all oil, gas and coal licences granted since 2021 and formulate a plan for ending fossil fuel use by 2030. [1]

The announcement comes as Just Stop Oil supporters are gearing up for their summer campaign, which will involve taking action at airports. Supporters of Just Stop Oil have also recently been disrupting both Labour and Tory politicians, demanding an end to oil and gas.

Speaking about the deal, Mark Mercurio, President and Chief Executive Officer of Gorilla Glue, said:

“As an eco-conscious brand, we are extremely excited to announce this new partnership with Just Stop Oil. Our team is always looking for innovative ways to demonstrate the efficacy of our products, and we feel the opportunity to display Gorilla Glue’s robust adhesive range to the public in the context of Just Stop Oil’s disruptive actions, is simply a match made in heaven. From glueing to roads or government departments, our incredibly strong range of polyurethane epoxies will keep environmental defenders in place for longer.”

A Just Stop Oil spokesperson said:



being dependent primarily on small donations from the public, however we feel expanding our scope to incorporate support from select corporate sponsors will ensure the longevity of the campaign and enable us to keep pushing for an end to the oil and gas that is harming our communities.

We see a strong unity of vision between Just Stop Oil and Gorilla Glue, both possessing a passion for effective adhesion as well as the colour orange. All Just Stop Oil banners will now feature Gorilla Glue's logo and pending the success of this partnership, Just Stop Oil is investigating the possibility of other sponsorship deals, including with Dulux who have approached Just Stop Oil with a view to launching a signature emulsion."



As the world passes tipping points that threaten the breakdown of ordered civilization, our politicians, captured by the interests of oil lobbyists and big business, are failing to protect our communities. Until we stop Tory oil, supporters of Just Stop Oil will continue taking proportionate action to demand necessary change. Sign up for action at juststopoil.org.

ENDS

Press contact: 07762 987334

Press email: juststopoilpress@protonmail.com

High quality images & video here: <https://juststopoil.org/press-media>

Website: <https://juststopoil.org/>

Facebook: <https://www.facebook.com/JustStopOil/>

Instagram: <https://www.instagram.com/just.stopoil/>



Youtube: <https://juststopoil.org/youtube>

TikTok: <https://www.tiktok.com/@juststopoil>

Notes to Editors

This is an April Fools Prank– No such deal exists and there is no connection between Just Stop Oil and Gorilla Glue or Dulux.

[1] Just Stop Oil is a coalition of groups working together to demand that the government immediately halt all future licensing and consents for the exploration, development and production of fossil fuels in the UK. Just Stop Oil is a member of the A22 Network of civil resistance projects.

Just Stop Oil 'Blue Lights' policy: our policy is, and has always been, to move out of the way for emergency vehicles with siren sounding and 'blue lights' on.

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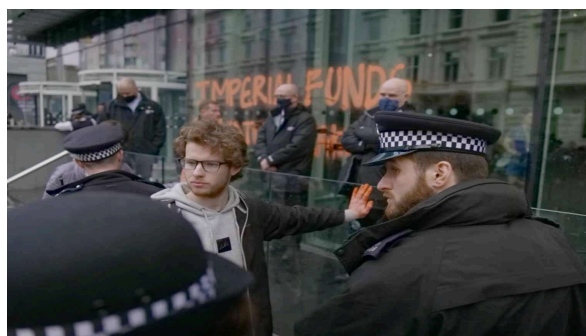
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Breaking: 'Just Stop Oil' youth campaigners deliver ultimatum to Boris Johnson


Press / February 14, 2022




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Press / March 2, 2022

 Tez Burns, 35, a bicycle mechanic from Swansea, is on trial today alongside Cal for gluing to the gates of the Royal Courts of Justice.

 Under the new offence of Locking On, the prosecution have to prove they caused serious disruption.

 Tez explains: "People were able to pass [under] our arms and there were 2 other exits. We would not have taken action if we thought we'd be stopping people having their court proceedings, which included appeal trials for deportations and child protection trials".

 Support people like Tez taking action and donate — chuffed.org/project/justst...



10:35 AM · Apr 16, 2024 · 87.7K Views

120

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Just Stop Oil 

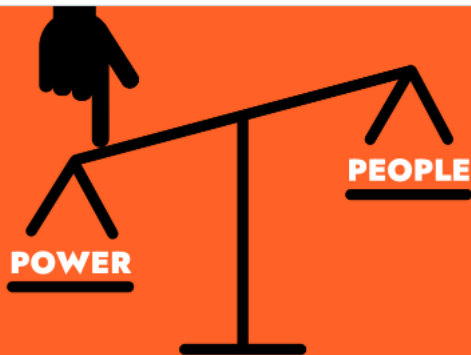
@JustStop_Oil



? WTF ARE INJUNCTIONS?

Injunctions are private laws bought by corporations and government agencies against individuals.

Since the Insulate Britain campaign, they have been increasingly used by the State and private companies to silence people from speaking out.



**WTF ARE
INJUNCTIONS?
AND WHY
SHOULD I CARE?**

1:29 PM · Apr 16, 2024 · 7,006 Views

121





Just Stop Oil @JustStop_Oil · 19h

...

They are usually used to protect people from harassment, and are not intended to be used as punishment. However, they are now being used against people in civil resistance.

2

3

6

330



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Injunctions bypass people's right to a trial by a jury of their peers, because rather than appearing before a jury, defendants appear before a high court judge to answer for the injunction. This is because a jury is more likely to acquit than a high court judge.

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Injunctions expose defendants to 'double jeopardy' - defendants may also face criminal charges for the same action, leading to further costs and potential imprisonment.

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Injunctions often result in huge legal costs applied to everyone named on an injunction, even if those individuals have never broken it.

1

6

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362



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Defendants may be offered an 'undertaking', where, if they choose to sign it, they accept conditions and no longer have to pay costs.

In this instance, the costs are divided equally among the remaining defendants who do not accept the undertaking.

2

7

10

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This is a divide and rule tactic being used by the State to silence ordinary people holding politicians and businesses to account.

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122

Cambridge-educated Just Stop Oil protester, 22, facing jail for delaying 4,000 plane passengers by scaling M25 gantry near Heathrow insists she'd do it all again

A [Just Stop Oil](#) protester who delayed 4,000 plane passengers by scaling a gantry above the M25 near Heathrow has said she 'would do it all again'.

Cressida Gethin, 22, was convicted of causing a public nuisance for her part in the motorway protest that caused a nine-mile tailback on July 20, 2022, and could be jailed when she is sentenced next month.

The disruptive demonstration came one day after the UK saw a record high temperature of 40C and two days after the government's Net-Zero Strategy was declared illegal.





The Cambridge University music student - who has taken two years out of her studies to focus on climate activism - admits having 'mixed feelings' about her actions and would like to meet the people who were impacted by them.

In an interview with environmentalist Chris Packham for the Radio Times, Gethin said: 'I would [do it all again], but there's one thing I'd do additionally - and I'm still considering it.'



'I'd find some way of meeting with anyone who had been affected by what I did, so they could tell me how they felt.'

The music student added: 'Sitting up there, surrounded by six lanes of empty motorway, I recall thinking that if the aim of the action was to get media attention we'd succeeded.'

'But at the same time, the very real moral dilemma of knowing that people would be stuck in their cars and missing important events - I heard one person missed their parent's funeral, which I would never want - doesn't sit easy with me.'

During her trial Grethin said she aimed to 'interrupt business as usual' and draw media attention to the 'dire situation' represented by the temperature in Britain.

She also told the court that she did not realise she was so close to Heathrow and did not choose the location.



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Mr Packham (pictured with Gethin), 62, was stuck in the traffic caused by the protest for four to five hours during a trip from Hampshire to Surrey, where he was working on a BBC show

In her closing statement, Gethin told the jury: 'You must use your judgement as human beings, who are aware of the context in which this action was taken - the deadly 40C heatwave, thousands of people dying of heatstroke.

'If your house had just burnt down, would four hours in traffic feel serious in comparison?

'If you were a climate refugee, forced out of your home country by heat, drought and social conflict, would missing a flight feel serious in comparison?

'In a vacuum, you could reasonably assume that someone stuck in a four hour traffic jam would be feeling very annoyed.

'But we are not in a vacuum - no one here can disagree that the climate crisis we're in is dire; billions of refugees, starvation, mass suffering and death - this is coming to us all.

'There may well have been more people in the traffic jams who felt like Chris Packham - we heard from Mr Packham that he did not feel seriously annoyed when stuck in the traffic.'

Mr Packham, 62, was stuck in the traffic caused by the protest for four to five hours during a trip from Hampshire to Surrey, where he was working on a BBC show.

Giving evidence in defence of Gethin during her trial, the broadcaster told jurors he came to 'sympathise' with the fact he needed to be put in a position where he was 'forced to think about the gravity of the situation' around climate change.

Gethin's father Nick - who was a member of Musicians Against Nuclear Arms as a young man - said that he would not have tried to stop her had he known about the plans.

However, he did raise concerns of his daughter potentially putting herself in 'real physical danger' by meeting the people impacted by her protest.

He said: 'You've seen the level of hatred and abuse you get just sitting in the middle of the road.'

On behalf of: the Claimant
By: Petra Billing
No: 1
Exhibit: PXB1

Date: 18 April 2024

QB-2021-003576

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

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) CATHERINE RENNIE-NASH AND 9 OTHERS

Defendants

**WITNESS STATEMENT OF PETRA
BILLING**

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