

500 1:000 2:000 3:000 4:000 5:000 6:000 7:000 8:000 9:000 10:000 11:000 12:000 13:000 14:000 15:000 16:000 17:000 18:000 19:000 20:000 21:000 22:000 23:000 24:000 25:000 26:000 27:000 28:000 29:000 30:000 31:000 32:000 33:000 34:000 35:000 36:000 37:000 38:000 39:000 40:000 41:000 42:000 43:000 44:000 45:000 46:000 47:000 48:000 49:000 50:000
 © Crown Copyright and Database Right 2011. All Rights Reserved. Ordnance Survey Licence Number: 100038894

Location Plan

Legend

- Proposed Highway Schemes

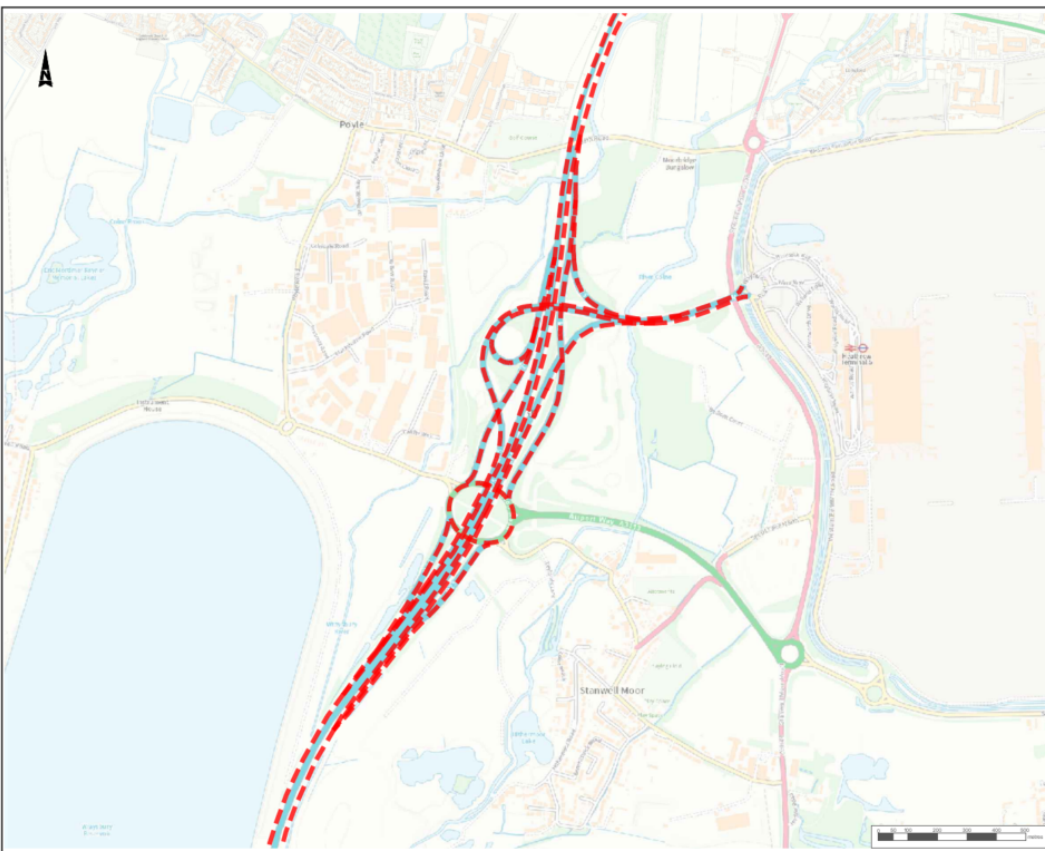
UTM	Information	25TQJ000000	431
UTM	Easting	25TQJ000000	431
UTM	Northing	25TQJ000000	431
UTM	Scale	25TQJ000000	431
UTM	UTM	25TQJ000000	431

Connect Plus

M25 Network

M25 Junction 13

500 1:000 2:000 3:000 4:000 5:000 6:000 7:000 8:000 9:000 10:000 11:000 12:000 13:000 14:000 15:000 16:000 17:000 18:000 19:000 20:000 21:000 22:000 23:000 24:000 25:000 26:000 27:000 28:000 29:000 30:000 31:000 32:000 33:000 34:000 35:000 36:000 37:000 38:000 39:000 40:000 41:000 42:000 43:000 44:000 45:000 46:000 47:000 48:000 49:000 50:000
 © Crown Copyright and Database Right 2011. All Rights Reserved. Ordnance Survey Licence Number: 100038894



500 1:000 2:000 3:000 4:000 5:000 6:000 7:000 8:000 9:000 10:000 11:000 12:000 13:000 14:000 15:000 16:000 17:000 18:000 19:000 20:000 21:000 22:000 23:000 24:000 25:000 26:000 27:000 28:000 29:000 30:000 31:000 32:000 33:000 34:000 35:000 36:000 37:000 38:000 39:000 40:000 41:000 42:000 43:000 44:000 45:000 46:000 47:000 48:000 49:000 50:000
 © Crown Copyright and Database Right 2011. All Rights Reserved. Ordnance Survey Licence Number: 100038894

Location Plan

Legend

- Proposed Highway Schemes

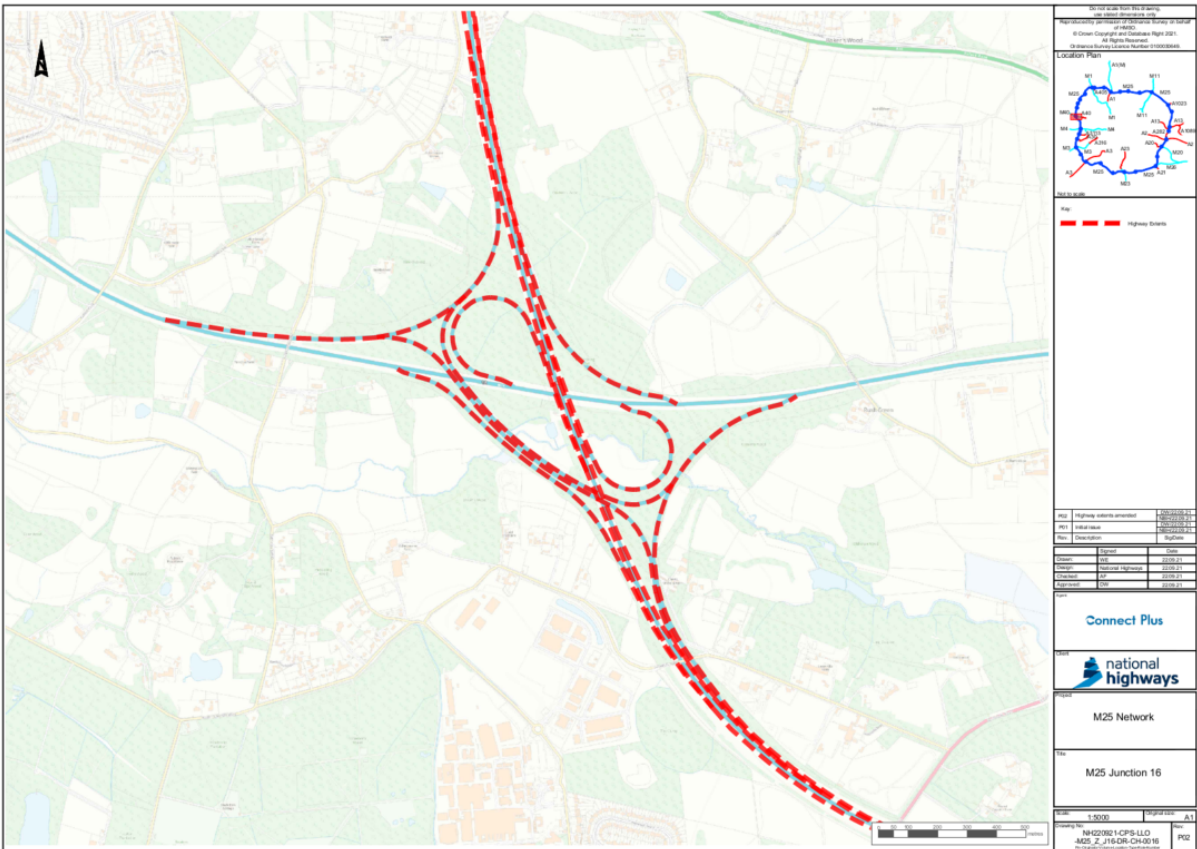
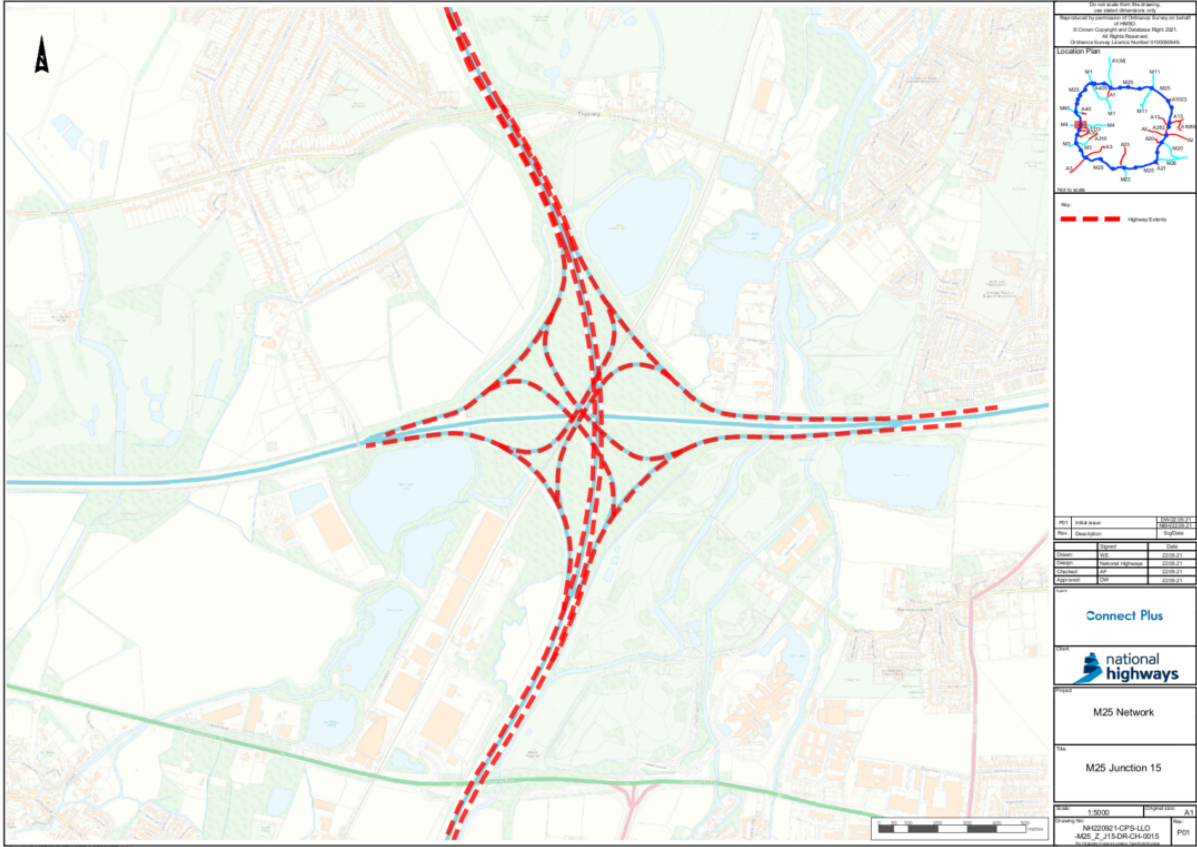
UTM	Information	25TQJ000000	431
UTM	Easting	25TQJ000000	431
UTM	Northing	25TQJ000000	431
UTM	Scale	25TQJ000000	431
UTM	UTM	25TQJ000000	431

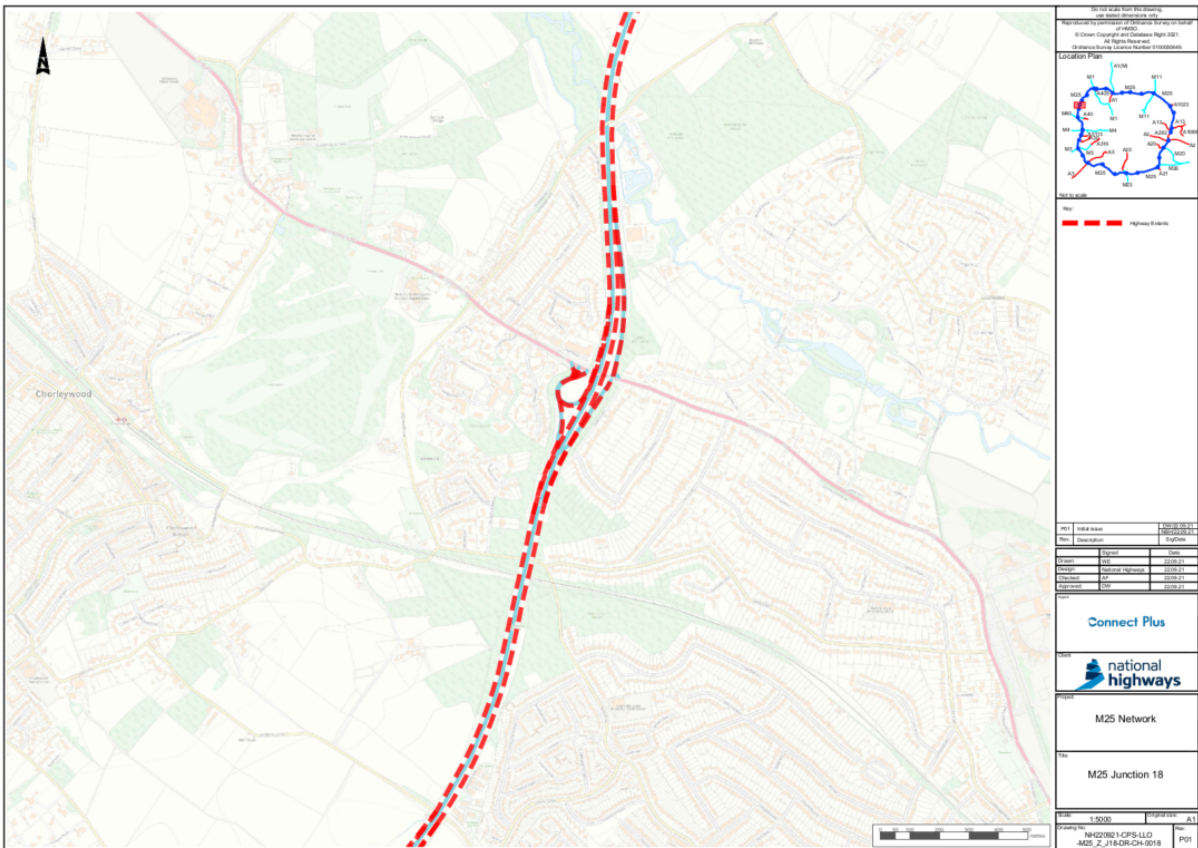
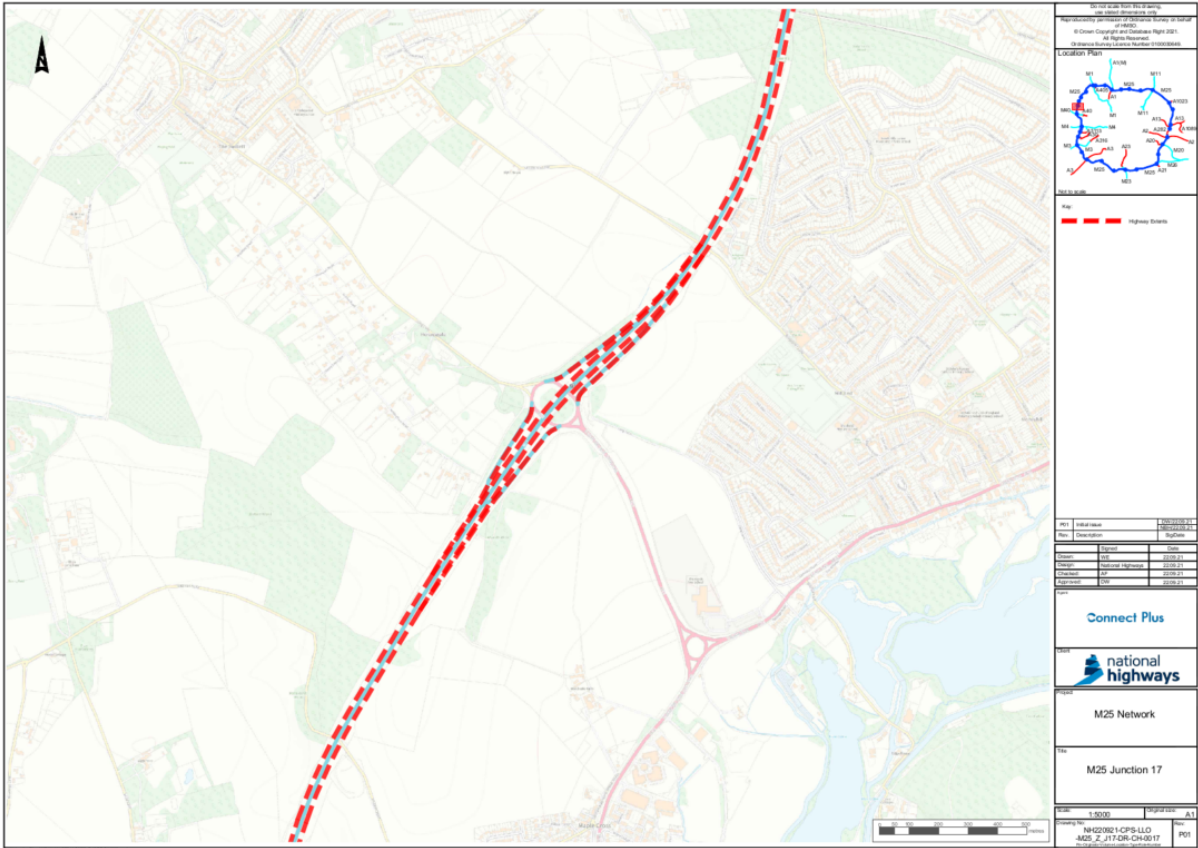
Connect Plus

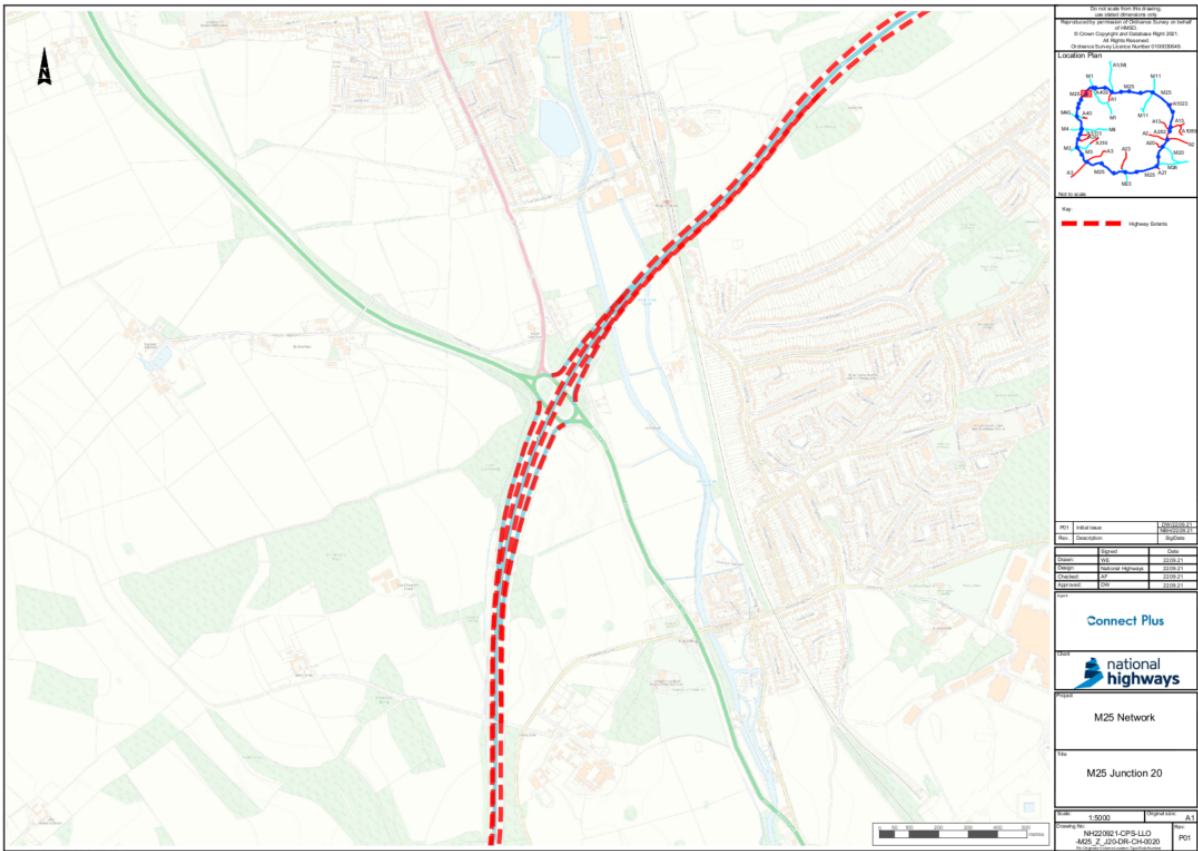
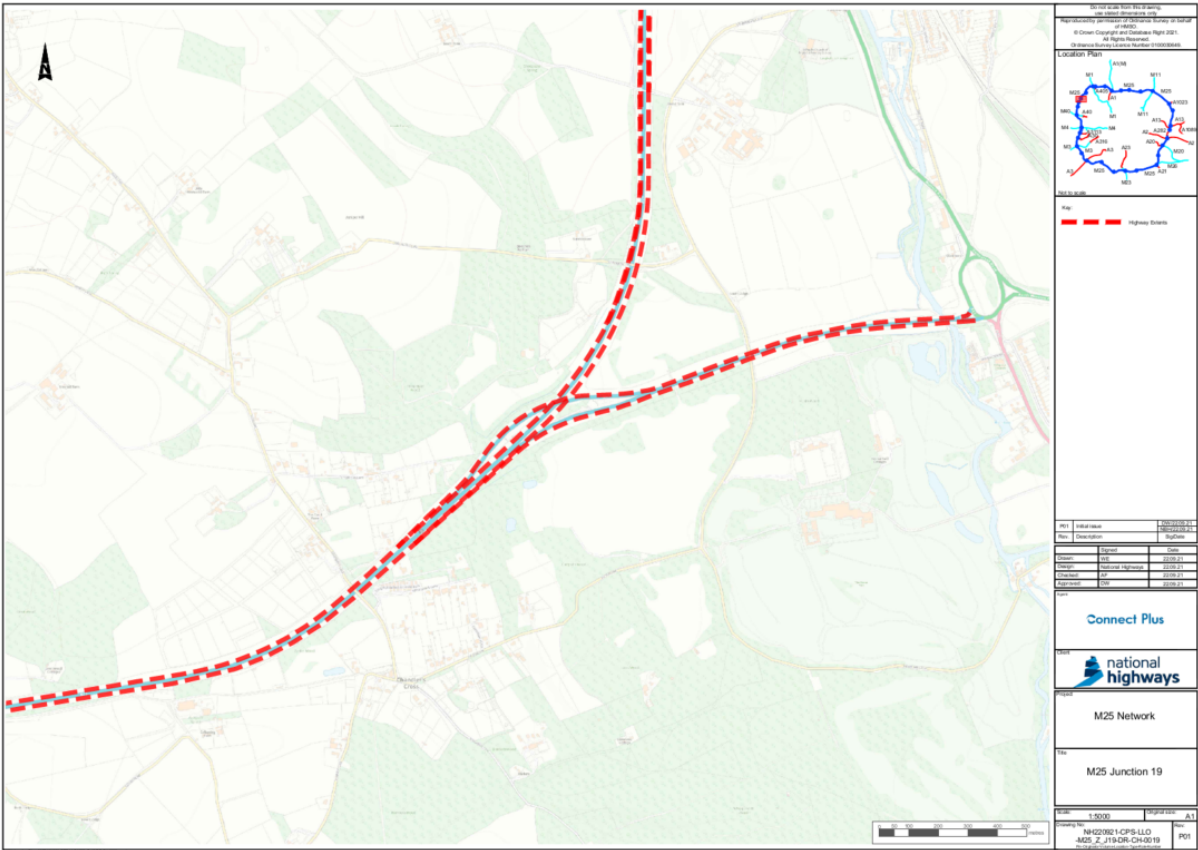
M25 Network

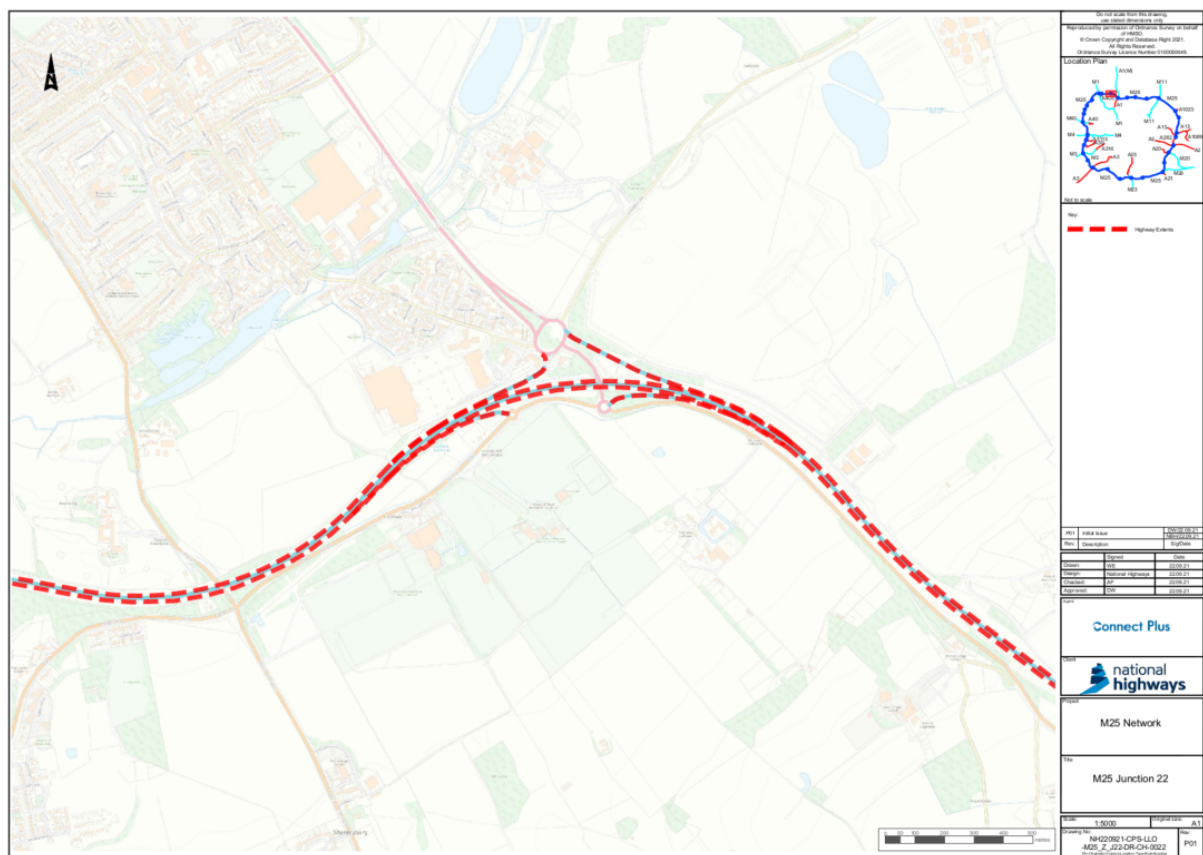
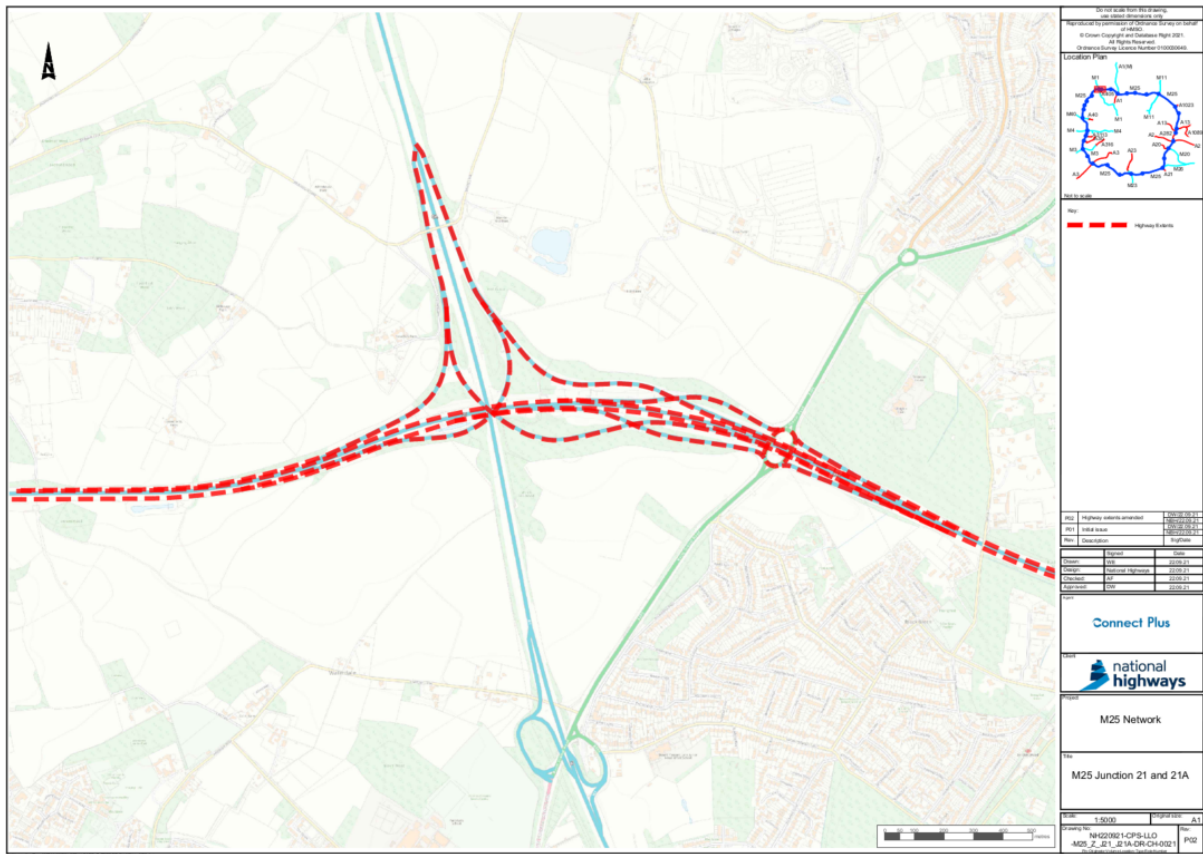
M25 Junction 14

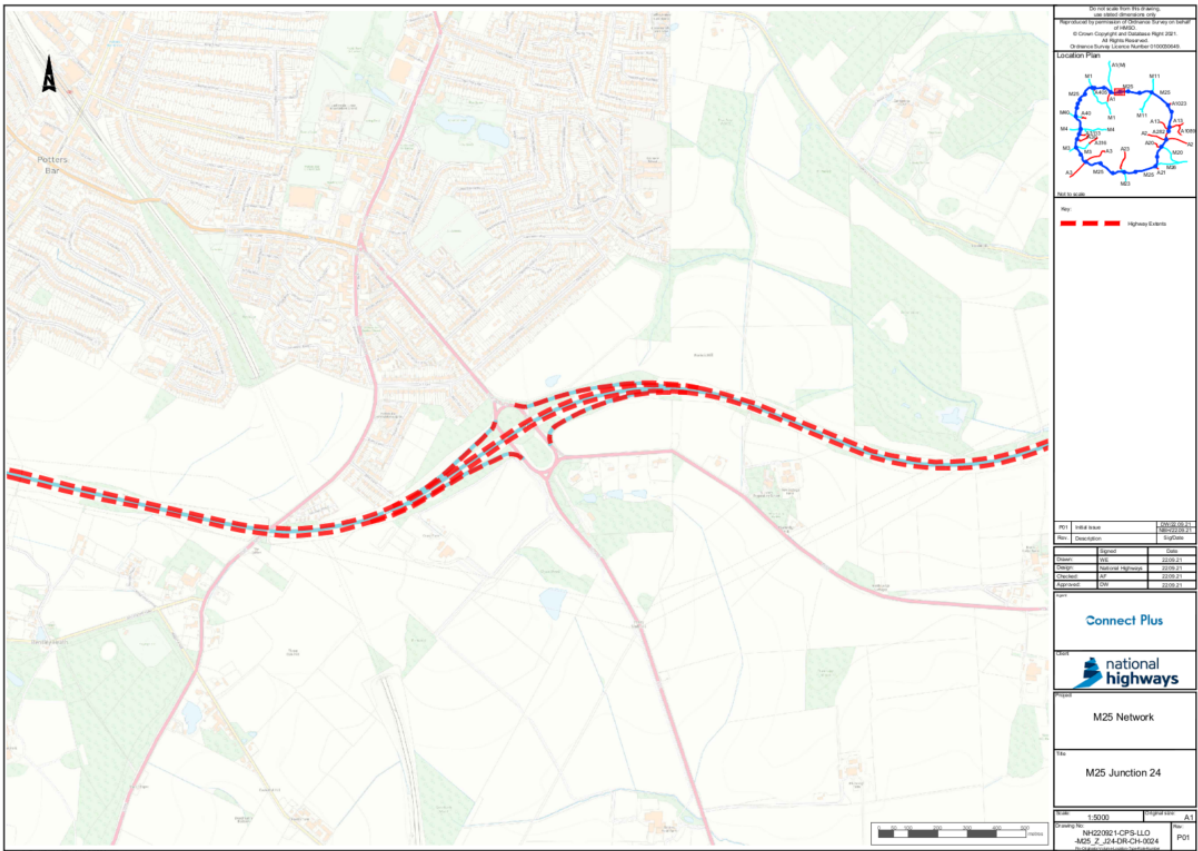
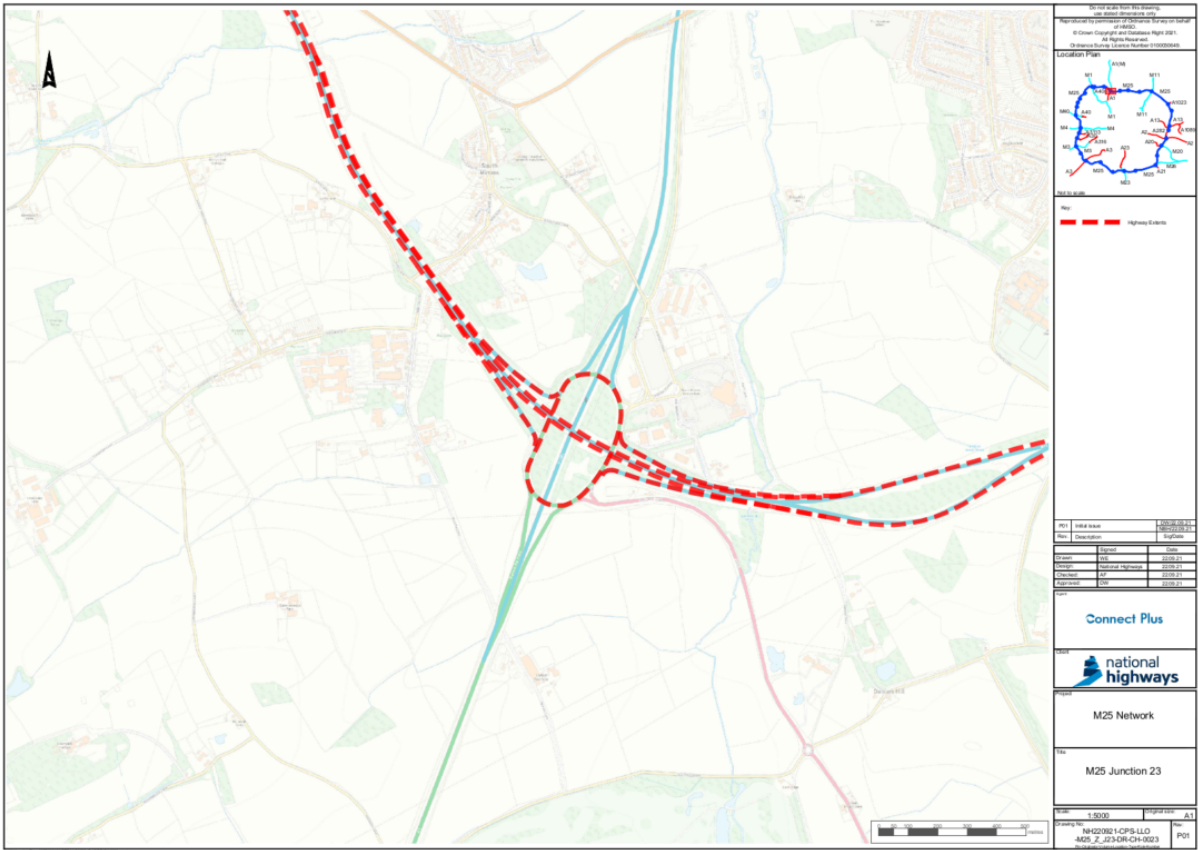
500 1:000 2:000 3:000 4:000 5:000 6:000 7:000 8:000 9:000 10:000 11:000 12:000 13:000 14:000 15:000 16:000 17:000 18:000 19:000 20:000 21:000 22:000 23:000 24:000 25:000 26:000 27:000 28:000 29:000 30:000 31:000 32:000 33:000 34:000 35:000 36:000 37:000 38:000 39:000 40:000 41:000 42:000 43:000 44:000 45:000 46:000 47:000 48:000 49:000 50:000
 © Crown Copyright and Database Right 2011. All Rights Reserved. Ordnance Survey Licence Number: 100038894

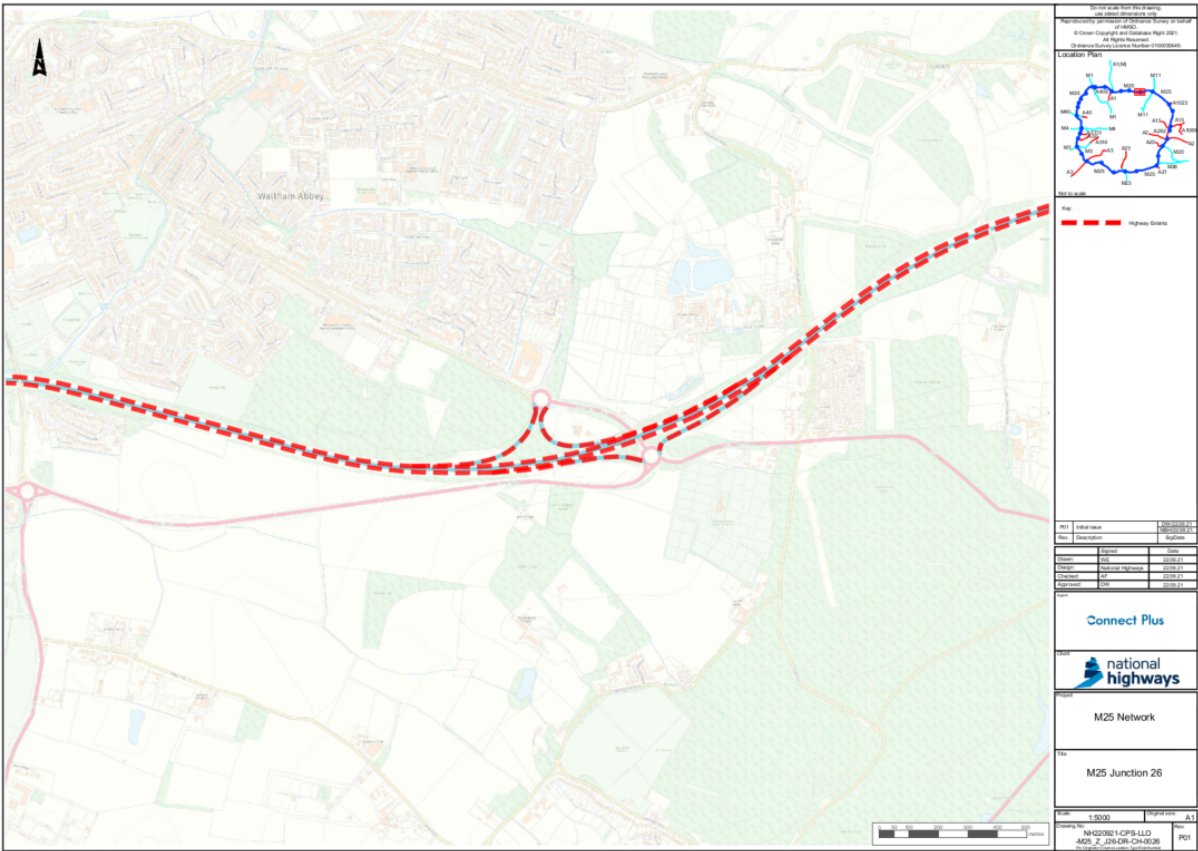
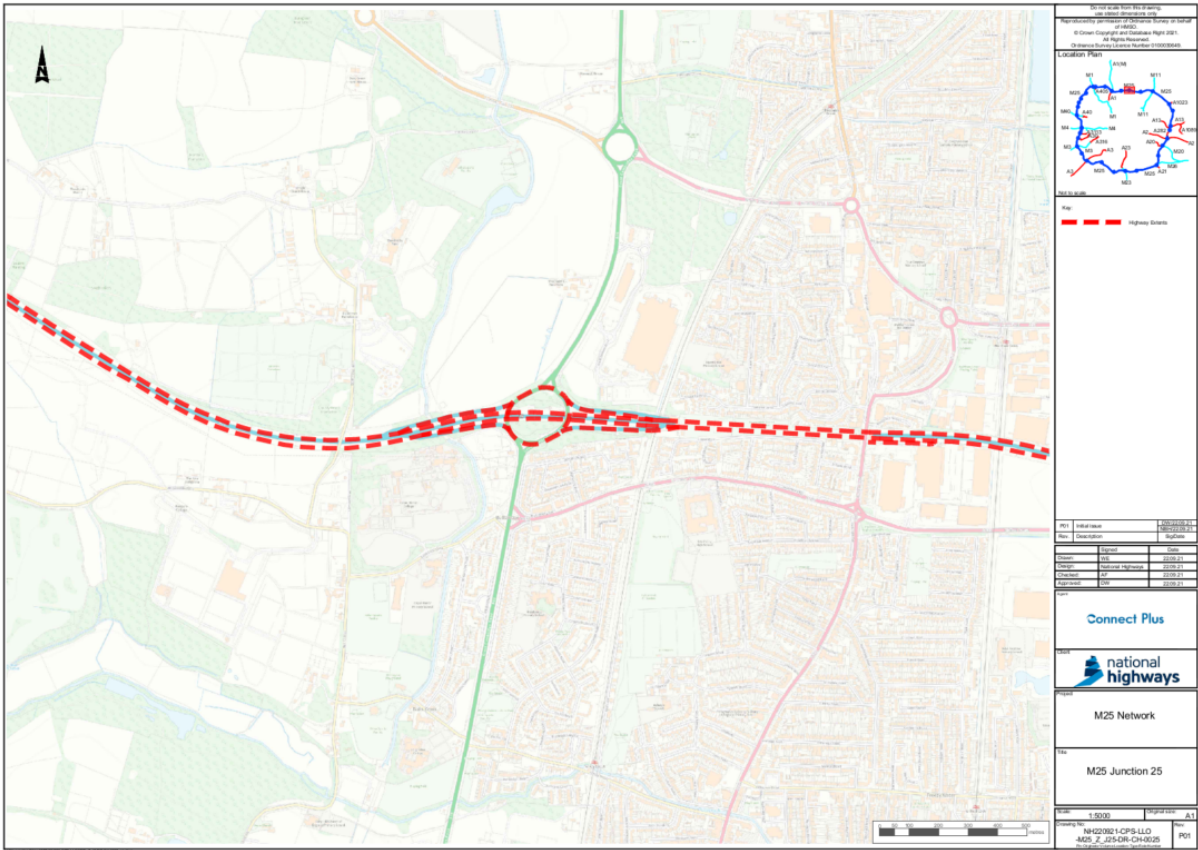


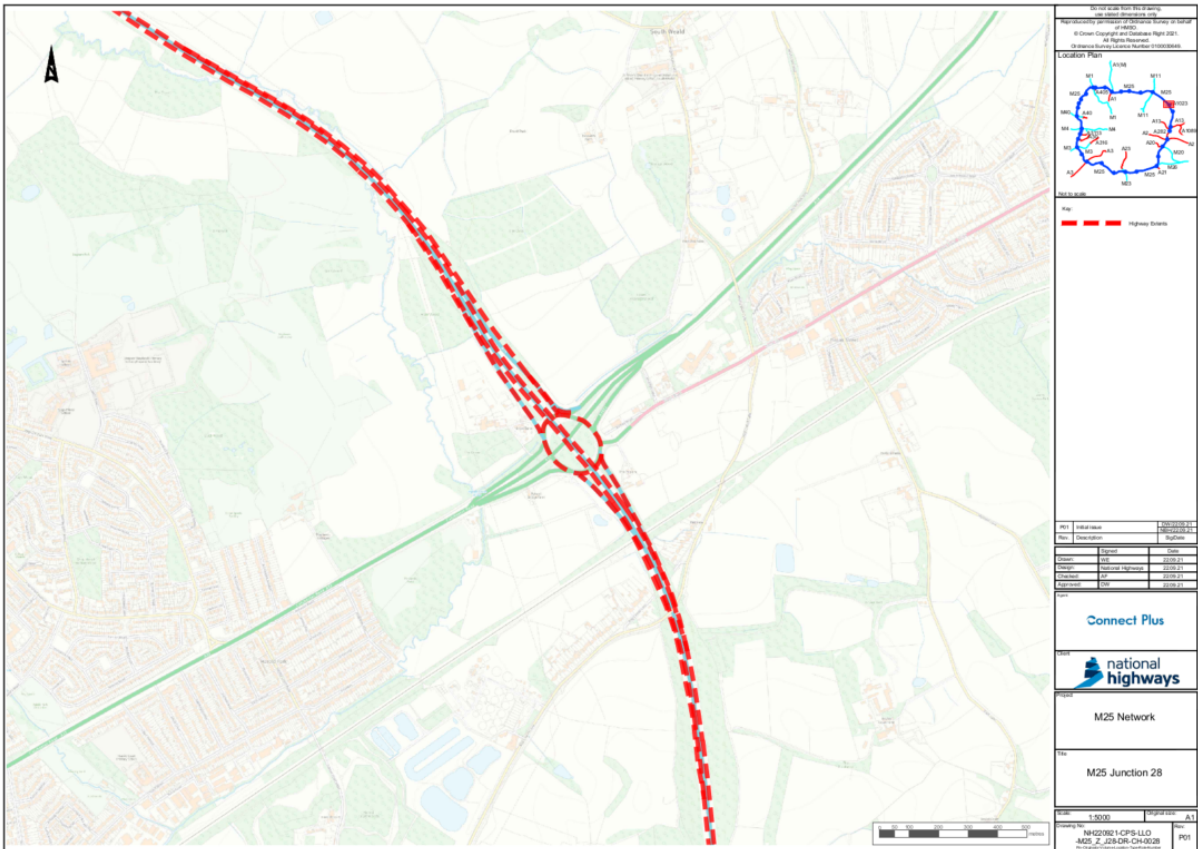
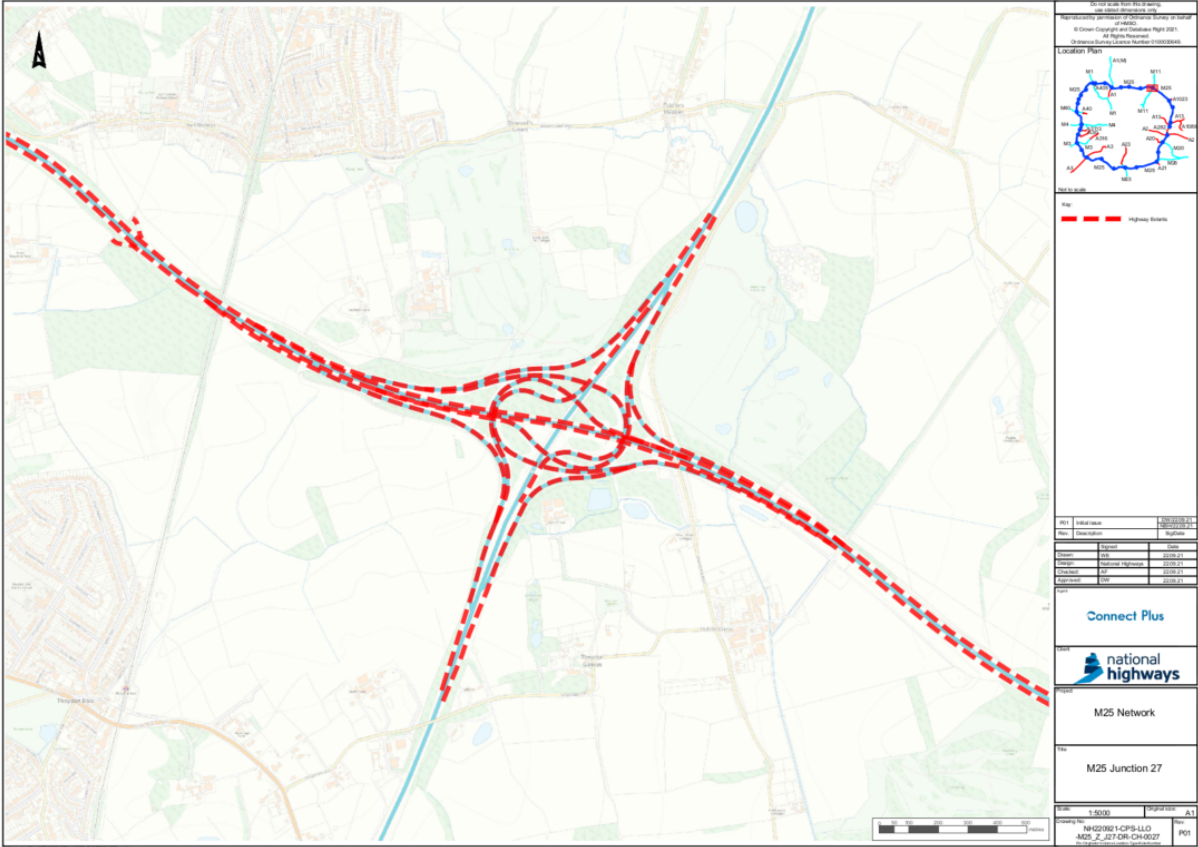


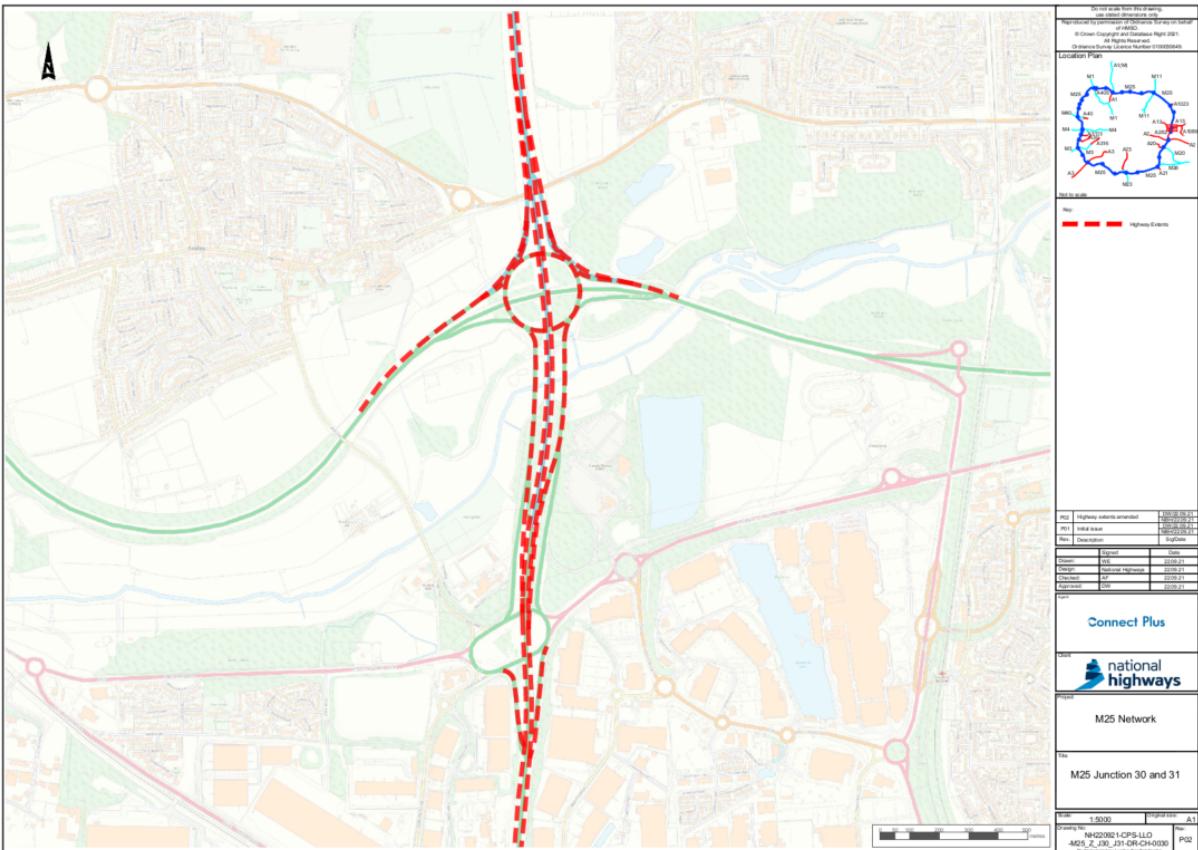
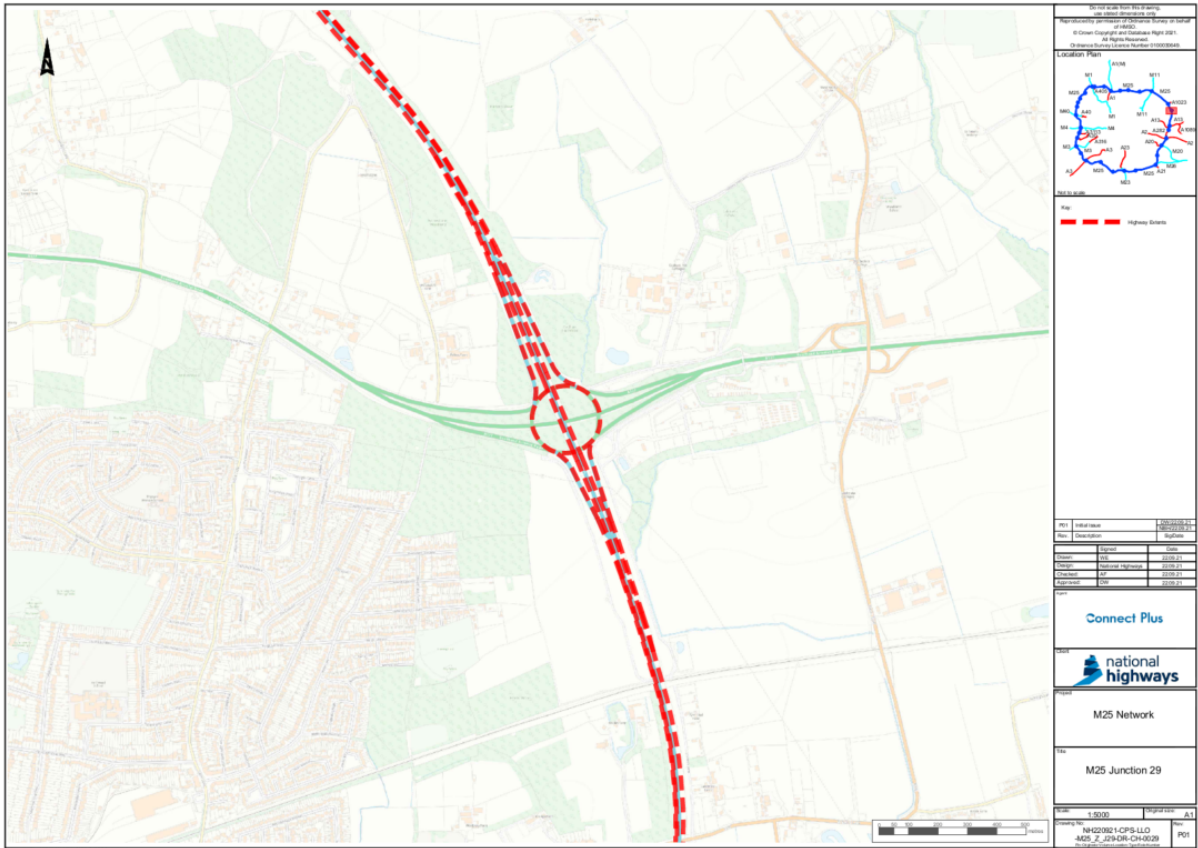






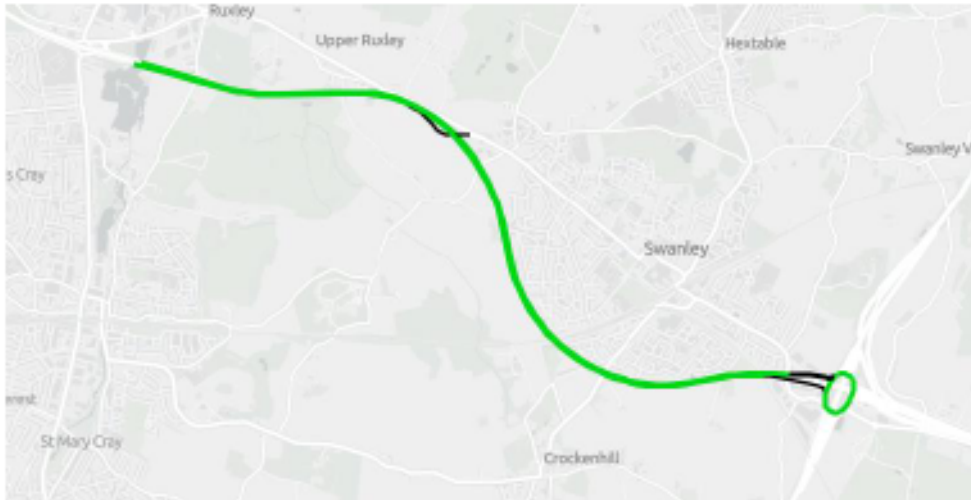






APPENDIX 2

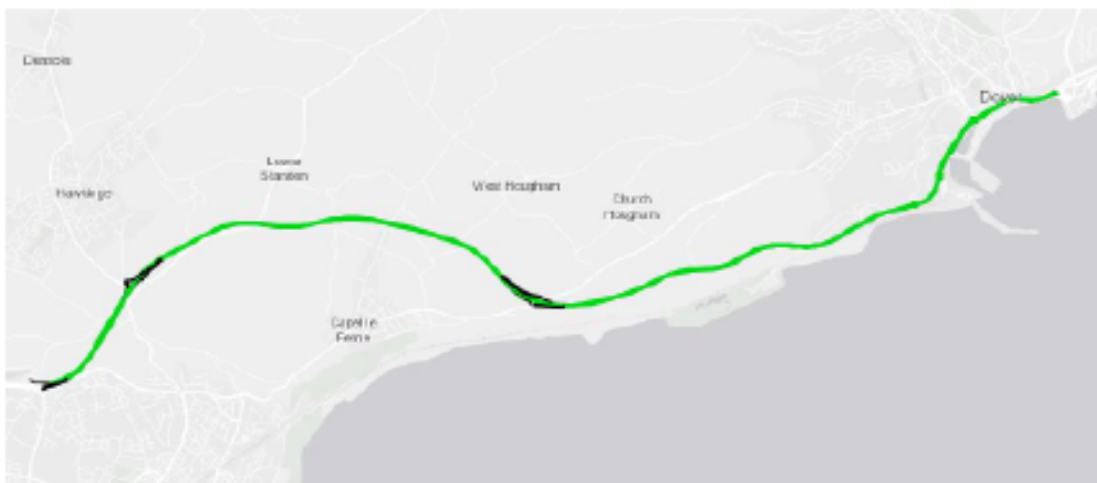
A20 London - M25



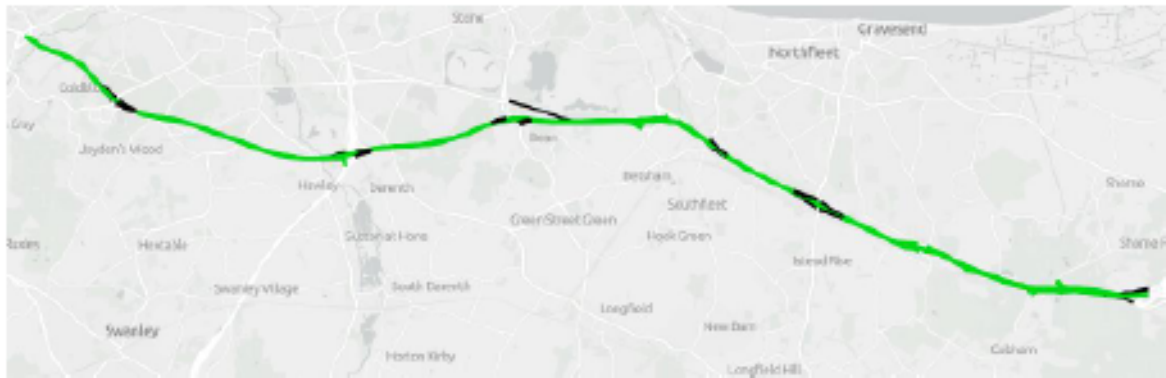
M20



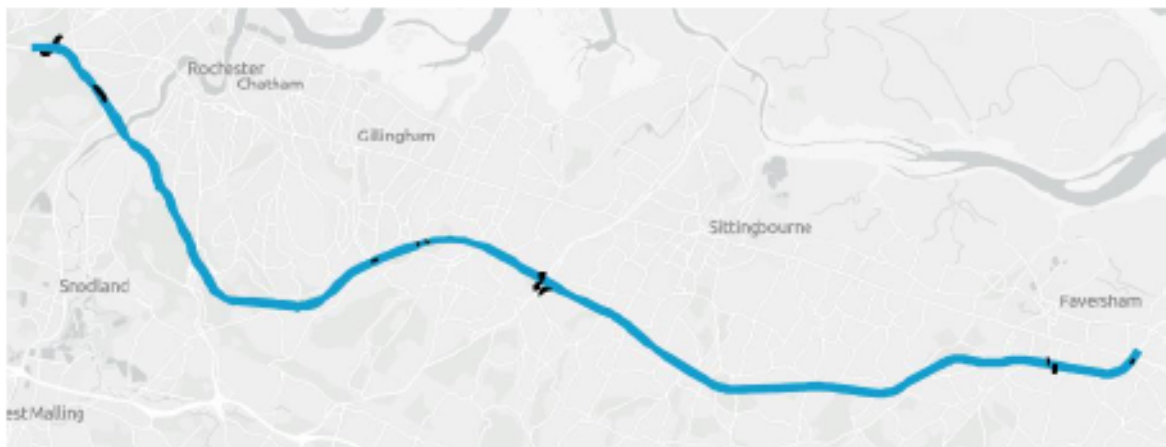
A20 Coast Section



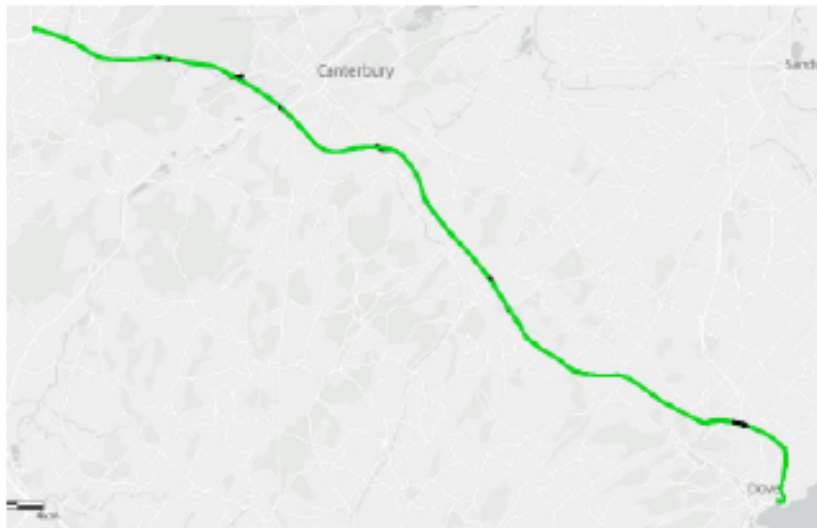
A2 London – M2 Section



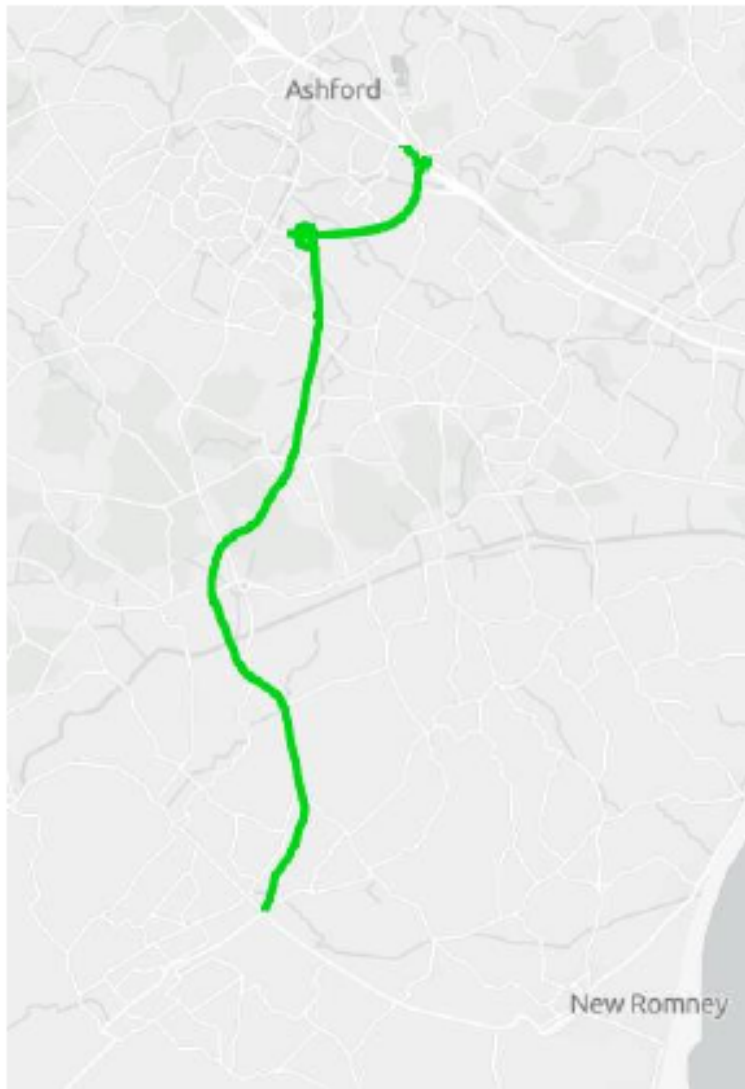
M2



A2 M2 - Dover Section



A2070

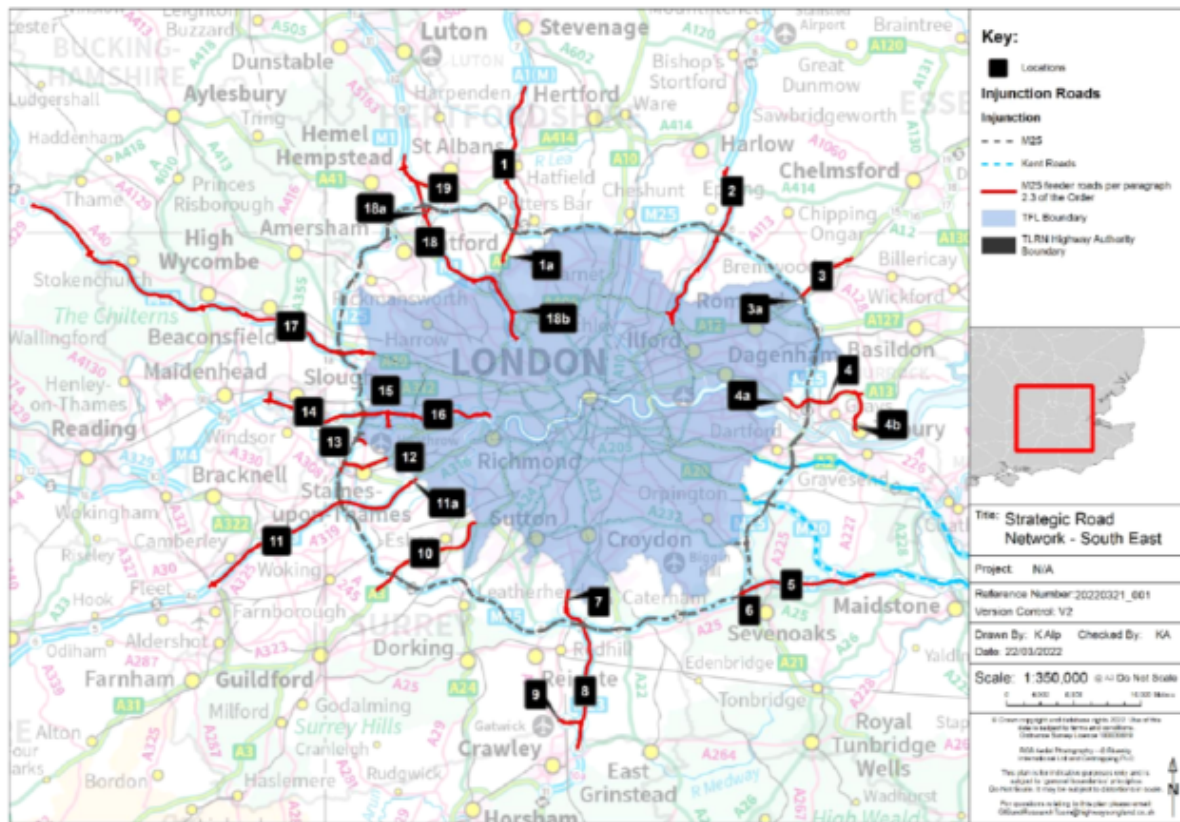


Kent & Surrounding areas SRN



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

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

51.	Not used	
52.	Karen WILDIN	
53.	Liam NORTON	
54.	Louis MCKECHNIE	
55.	Not used	
56.	Not used	
57.	Not used	
58.	Not used	
59.	Not used	
60.	Not used	
61.	Not used	
62.	Not used	
63.	Not used	
64.	Not used	
65.	Not used	
66.	Not used	
67.	Not used	
68.	Not used	

69.	Not used	
70.	Not used	
71.	Not used	
72.	Not used	
73.	Not used	
74.	Not used	
75.	Not used	
76.	Not used	
77.	Not used	
78.	Not used	
79.	Not used	
80.	Not used	
81.	Not used	
82.	Not used	
83.	Not used	
84.	Not used	
85.	Not used	
86.	Not used	

87.	Not used	
88.	Not used	
89.	Not used	
90.	Not used	
91.	Not used	
92.	Not used	
93.	Stephen Charles GOWER	
94.	Not used	
95.	Not used	
96.	Not used	
97.	Not used	
98.	Not used	
99.	Not used	
100.	Tessa-Marie BURNS	
101.	Theresa NORTON	
102.	Not used	
103.	Not used	
104.	Tracey MALLAGHAN	

105.	Not used	
106.	Not used	
107.	Not used	
108.	Not used	
109.	Not used	
110.	Not used	
111.	Not used	
112.	Not used	
113.	Not used	
114.	Not used	
115.	Not used	
116.	Not used	
117.	Not used	
118.	Not used	
119.	Not used	
120.	Not used	
121.	Not used	
122.	Not used	

123.	Not used	
124.	Not used	
125.	Not used	
126.	Not used	
127.	Not used	
128.	Not used	
129.	Not used	
130.	Not used	
131.	Not used	
132.	Not used	
133.	Not used	
134.	Not used	
135.	Not used	
136.	Morgan TROWLAND	
137.	Not used	
138.	Not used	
139.	Not used	
140.	Not used	

SCHEDULE 2

CHIEF CONSTABLES OF THE FORCES OF:

City of London Police

Metropolitan Police Service

Avon and Somerset Constabulary

Bedfordshire Police

Cambridgeshire Constabulary

Cheshire Constabulary

Cleveland Police

Cumbria Constabulary

Derbyshire Constabulary

Devon & Cornwall Police

Dorset Police

Durham Constabulary

Essex Police

Gloucestershire Constabulary

Greater Manchester Police

Hampshire Constabulary

Hertfordshire Constabulary

Humberside Police

Kent Police

Lancashire Constabulary

Leicestershire Police

Lincolnshire Police

Merseyside Police

Norfolk Constabulary

North Yorkshire Police

Northamptonshire Police

Northumbria Police

Nottinghamshire Police

South Yorkshire Police

Staffordshire Police

Suffolk Constabulary

Surrey Police

Sussex Police

Thames Valley Police

Warwickshire Police

West Mercia Police

West Midlands Police

West Yorkshire Police

Wiltshire Police

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

- 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

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

[Here is how HMCTS uses personal data about you](#)



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

This email is from DLA Piper UK LLP. The contents of this email and any attachments are confidential to the intended recipient. They may not be disclosed to or used by or copied in any way by anyone other than the intended recipient. If this email is received in error, please contact DLA Piper UK LLP on +44 (0) 20 7349 0296 quoting the name of the sender and the email address to which it has been sent and then delete it. For more information on how we process personal data please see www.dlapiper.com/privacy-policy. Please note that neither DLA Piper UK LLP nor the sender accepts any responsibility for viruses and it is your responsibility to scan or otherwise check this email and any attachments. DLA Piper UK LLP is a limited liability partnership registered in England and Wales (registered number OC307847) which provides services from offices in England, Belgium, Germany and the People's Republic of China. A list of members is open for inspection at its registered office and principal place of business 160 Aldersgate Street London EC1A 4HT. Partner denotes member of a limited liability partnership. DLA Piper UK LLP is authorised and regulated by the Solicitors Regulation Authority (SRA No. 401322) and is part of DLA Piper, a global law firm, operating through various separate and distinct legal entities. For further information, please refer to www.dlapiper.com.

This e-mail and any attachments is intended only for the attention of the addressee(s). Its unauthorised use, disclosure, storage or copying is not permitted. If you are not the intended recipient, please destroy all copies and inform the sender by return e-mail. Internet e-mail is not a secure medium. Any reply to this message could be intercepted and read by someone else. Please bear that in mind when deciding whether to send material in response to this message by e-mail. This e-mail (whether you are the sender or the recipient) may be monitored, recorded and retained by the Ministry of Justice. Monitoring / blocking software may be used, and e-mail content may be read at any time. You have a responsibility to ensure laws are not broken when composing or forwarding e-mails and their contents.

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? / /

The date of service is / /

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.

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

 HM Courts & Tribunals Service

[Here is how HMCTS uses personal data about you](#)



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

Phone: 020 3936 8957

Web: www.gov.uk/hmcts

 HM Courts & Tribunals Service

[Here is how HMCTS uses personal data about you](#)



This e-mail and any attachments is intended only for the attention of the addressee(s). Its unauthorised use, disclosure, storage or copying is not permitted. If you are not the intended recipient, please destroy all copies and inform the sender by return e-mail. Internet e-mail is not a secure medium. Any reply to this message could be intercepted and read by someone else. Please bear that in mind when deciding whether to send material in response to this message by e-mail. This e-mail (whether you are the sender or the recipient) may be monitored, recorded and retained by the Ministry of Justice. Monitoring / blocking software may be used, and e-mail content may be read at any time. You have a responsibility to ensure laws are not broken when composing or forwarding e-mails and their contents.

This email is from DLA Piper UK LLP. The contents of this email and any attachments are confidential to the intended recipient. They may not be disclosed to or used by or copied in any way by anyone other than the intended recipient. If this email is received in error, please contact DLA Piper UK LLP on +44 (0) 20 7349 0296 quoting the name of the sender and the email address to which it has been sent and then delete it. For more information on how we process personal data please see www.dlapiper.com/privacy-policy. Please note that neither DLA Piper UK

LLP nor the sender accepts any responsibility for viruses and it is your responsibility to scan or otherwise check this email and any attachments. DLA Piper UK LLP is a limited liability partnership registered in England and Wales (registered number OC307847) which provides services from offices in England, Belgium, Germany and the People's Republic of China. A list of members is open for inspection at its registered office and principal place of business 160 Aldersgate Street London EC1A 4HT. Partner denotes member of a limited liability partnership. DLA Piper UK LLP is authorised and regulated by the Solicitors Regulation Authority (SRA No. 401322) and is part of DLA Piper, a global law firm, operating through various separate and distinct legal entities. For further information, please refer to www.dlapiper.com.

This e-mail and any attachments is intended only for the attention of the addressee(s). Its unauthorised use, disclosure, storage or copying is not permitted. If you are not the intended recipient, please destroy all copies and inform the sender by return e-mail. Internet e-mail is not a secure medium. Any reply to this message could be intercepted and read by someone else. Please bear that in mind when deciding whether to send material in response to this message by e-mail. This e-mail (whether you are the sender or the recipient) may be monitored, recorded and retained by the Ministry of Justice. Monitoring / blocking software may be used, and e-mail content may be read at any time. You have a responsibility to ensure laws are not broken when composing or forwarding e-mails and their contents.



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-ways-2/2

2/2 236

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

  16

237

31  1 

 Like

 Comment

 Share

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

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.

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

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

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 2 / 0 4 / 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.

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 (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
- 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)

Facebook profile

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

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 2 / 0 4 / 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.

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

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
 - 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)*

X (formerly known as Twitter) profile

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

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?	2	7	/	0	3	/	2	0	2	4
The date of service is	2	7	/	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.

<ol style="list-style-type: none">1. Application Notice dated 27 March 20242. Second Witness Statement of Sean Foster Martell dated 26 March 20243. Exhibit SFM2 to the Second Witness Statement of Sean Foster Martell dated 26 March 20244. 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)

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

<ol style="list-style-type: none">1. juststopoil@protonmail.com2. juststopoilpress@protonmail.com3. insulatebritainlegal@protonmail.com4. Ring2021@protonmail.com5. actions@animalrebellion.org6. fundraising@animalrebellion.org7. integration@animalrebellion.org8. talks@animalrebellion.org9. global@animalrebellion.org10. localgroups@animalrebellion.org11. media@animalrebellion.org12. governance@animalrebellion.org13. pressoffice@animalrebellion.org14. finance@animalrebellion.org15. techsupport@animalrebellion.org16. 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

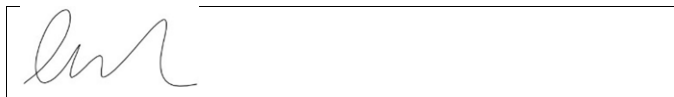
Email addresses

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 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

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.

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,
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.

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,
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.

Louis McKechnie

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,
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.

Louis McKechnie

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,
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.



DLA Piper UK LLP
1 St Paul's Place
Sheffield
S1 2JX
United Kingdom
DX: 708580 Sheffield 10
T: +44 (0) 20 7349 0296
F: +44 (0) 114 270 0568 or +44 (0)
114 273 8948
dlapiper.com

Morgan Trowland

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,
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.

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

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-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.

Theresa 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,
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.

Tracey Mallaghan

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,
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.

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

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?	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.

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).

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

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)

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

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?	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).

Karen Wildin

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

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?	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.

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
- Liam Norton

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 (..... time sent, where document is other than a claim form) (please specify)

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)

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

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? 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.

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).

Louis McKechnie

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 (..... time sent, where document is other than a claim form) (please specify)

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)

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

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? 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.

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).

Louis McKechnie

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 (..... time sent, where document is other than a claim form) (please specify)

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)

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

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? 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.

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
- Morgan Trowland

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 (..... time sent, where document is other than a claim form) (please specify)

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)

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

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? 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).

Paul Sheeky

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

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? / /

The date of service is / /

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).

Stephen Charles Gower

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

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?	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).

Tessa-Marie Burns

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

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?	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.

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).

Theresa Norton

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 (..... time sent, where document is other than a claim form) (please specify)

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)

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

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?	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.

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).

Tracey Mallaghan

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 (..... time sent, where document is other than a claim form) (please specify)
-

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)

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

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.

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,



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

This email is from DLA Piper UK LLP. The contents of this email and any attachments are confidential to the intended recipient. They may not be disclosed to or used by or copied in any way by anyone other than the intended recipient. If this email is received in error, please contact DLA Piper UK LLP on +44 (0) 20 7349 0296 quoting the name of the sender and the email address to which it has been sent and then delete it. For more information on how we process personal data please see www.dlapiper.com/privacy-policy. Please note that neither DLA Piper UK LLP nor the sender accepts any responsibility for viruses and it is your responsibility to scan or otherwise check this email and any attachments. DLA Piper UK LLP is a limited liability partnership registered in England and Wales (registered number OC307847) which provides services from offices in England, Belgium, Germany and the People's Republic of China. A list of members is open for inspection at its registered office and principal place of business 160 Aldersgate Street London EC1A 4HT. Partner denotes member of a limited liability partnership. DLA Piper UK LLP is authorised and regulated by the Solicitors Regulation Authority (SRA No. 401322) and is part of DLA Piper, a global law firm, operating through

various separate and distinct legal entities. For further information, please refer to www.dlapiper.com.

This email is from DLA Piper UK LLP. The contents of this email and any attachments are confidential to the intended recipient. They may not be disclosed to or used by or copied in any way by anyone other than the intended recipient. If this email is received in error, please contact DLA Piper UK LLP on +44 (0) 20 7349 0296 quoting the name of the sender and the email address to which it has been sent and then delete it. For more information on how we process personal data please see www.dlapiper.com/privacy-policy. Please note that neither DLA Piper UK LLP nor the sender accepts any responsibility for viruses and it is your responsibility to scan or otherwise check this email and any attachments. DLA Piper UK LLP is a limited liability partnership registered in England and Wales (registered number OC307847) which provides services from offices in England, Belgium, Germany and the People's Republic of China. A list of members is open for inspection at its registered office and principal place of business 160 Aldersgate Street London EC1A 4HT. Partner denotes member of a limited liability partnership. DLA Piper UK LLP is authorised and regulated by the Solicitors Regulation Authority (SRA No. 401322) and is part of DLA Piper, a global law firm, operating through various separate and distinct legal entities. For further information, please refer to www.dlapiper.com.

**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

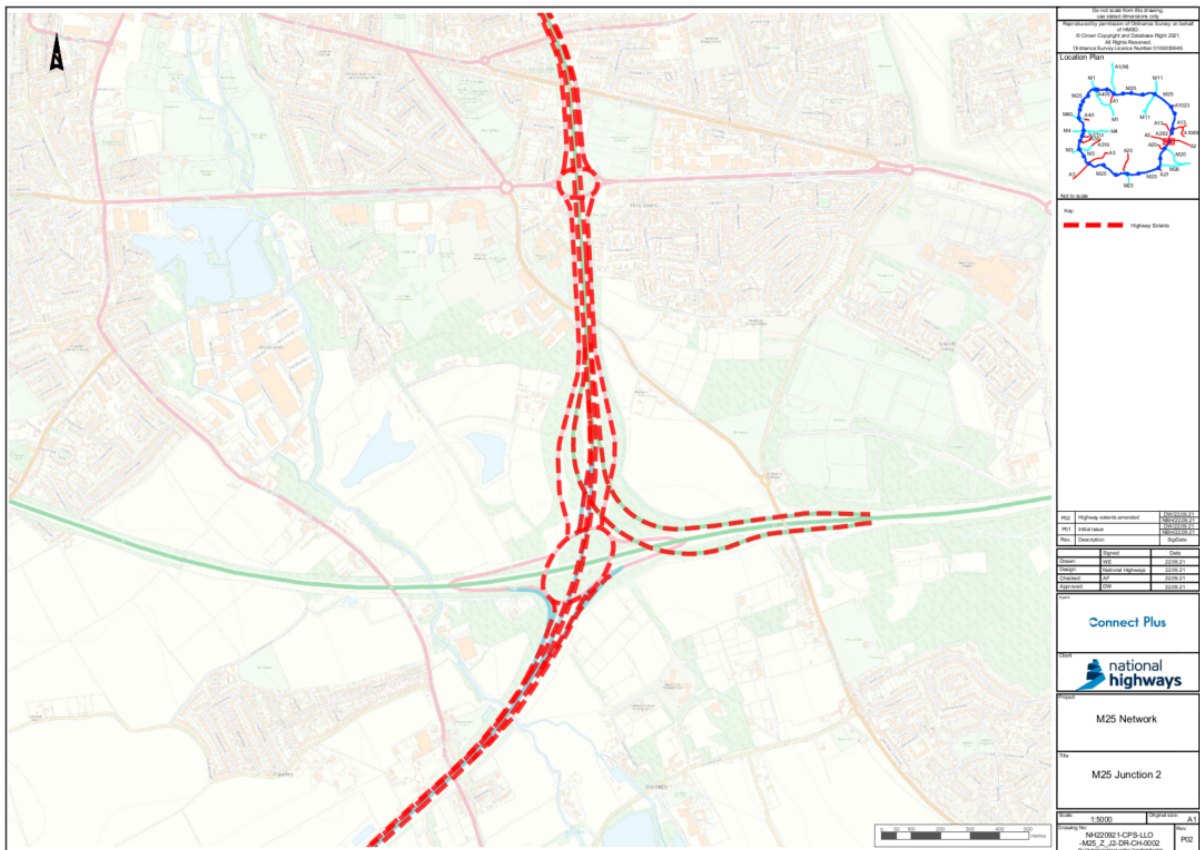
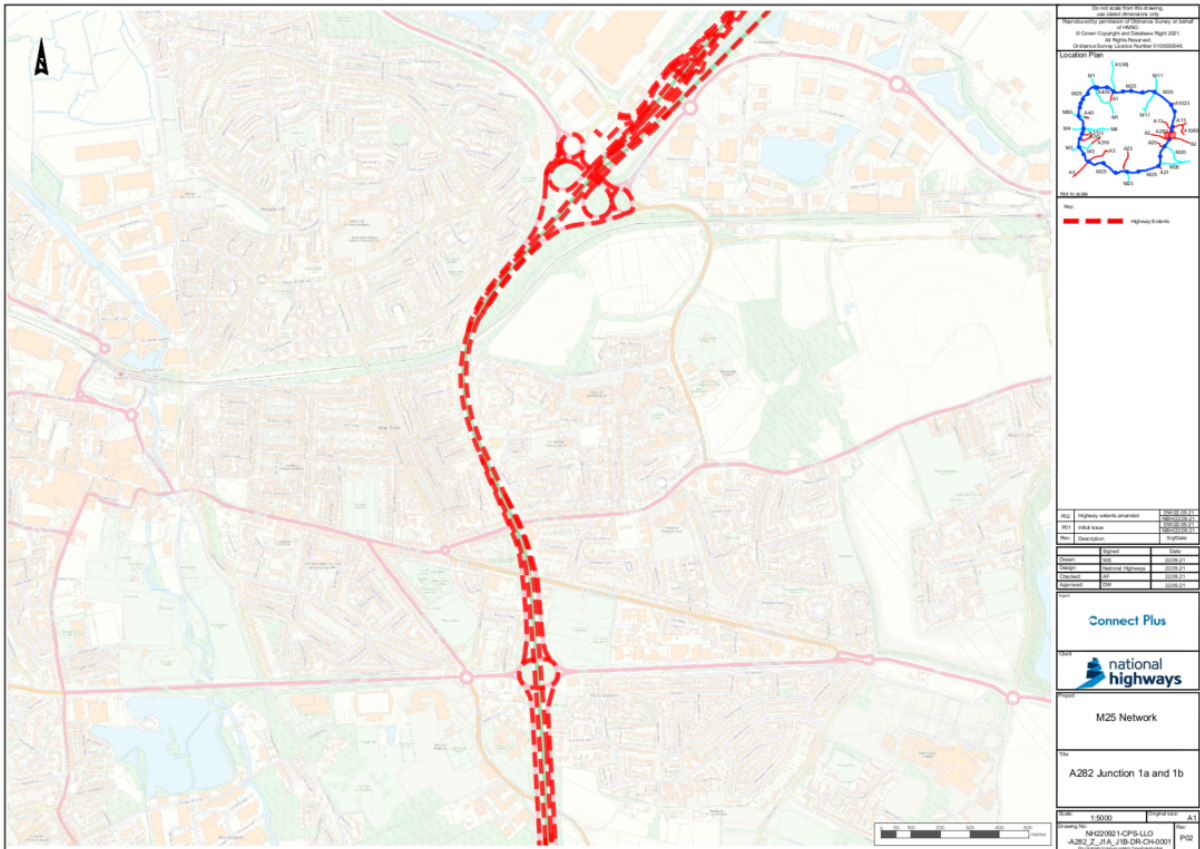
E: petra.billing@dlapiper.com and rob.shaw@dlapiper.com

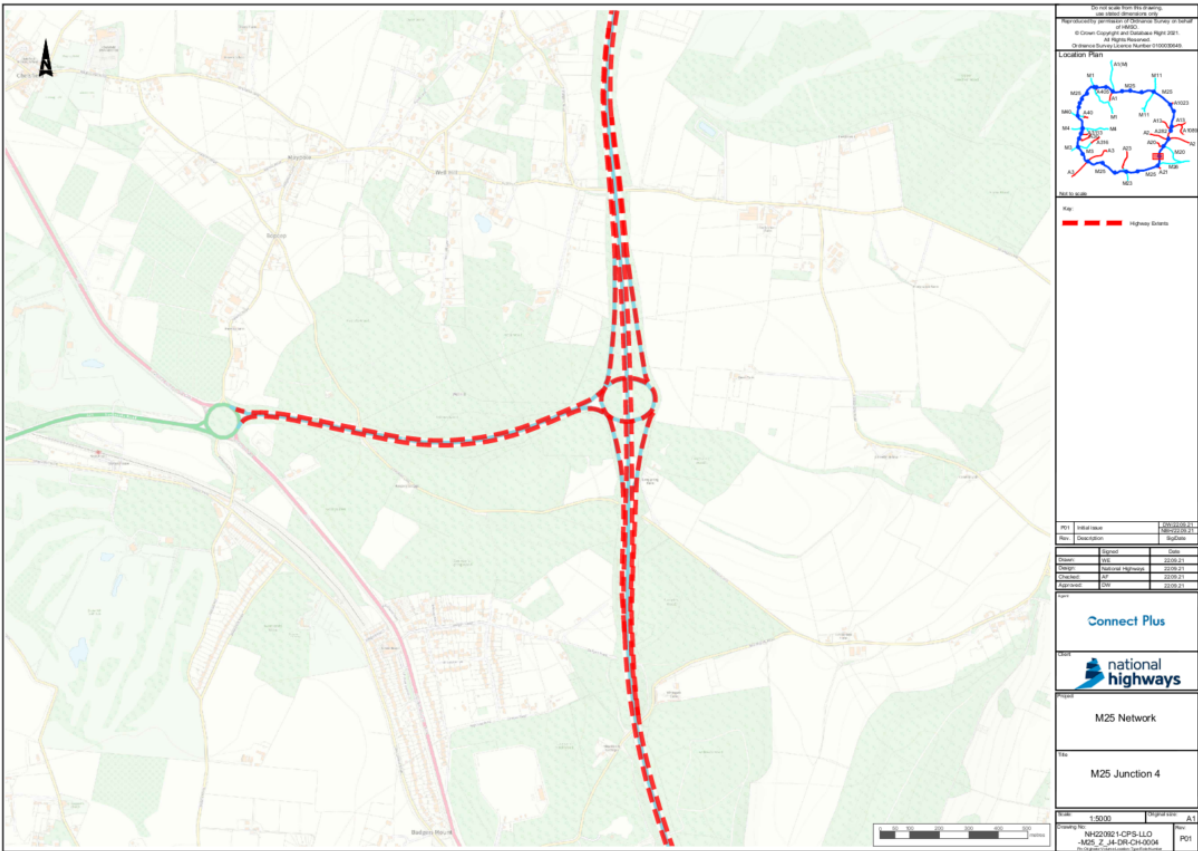
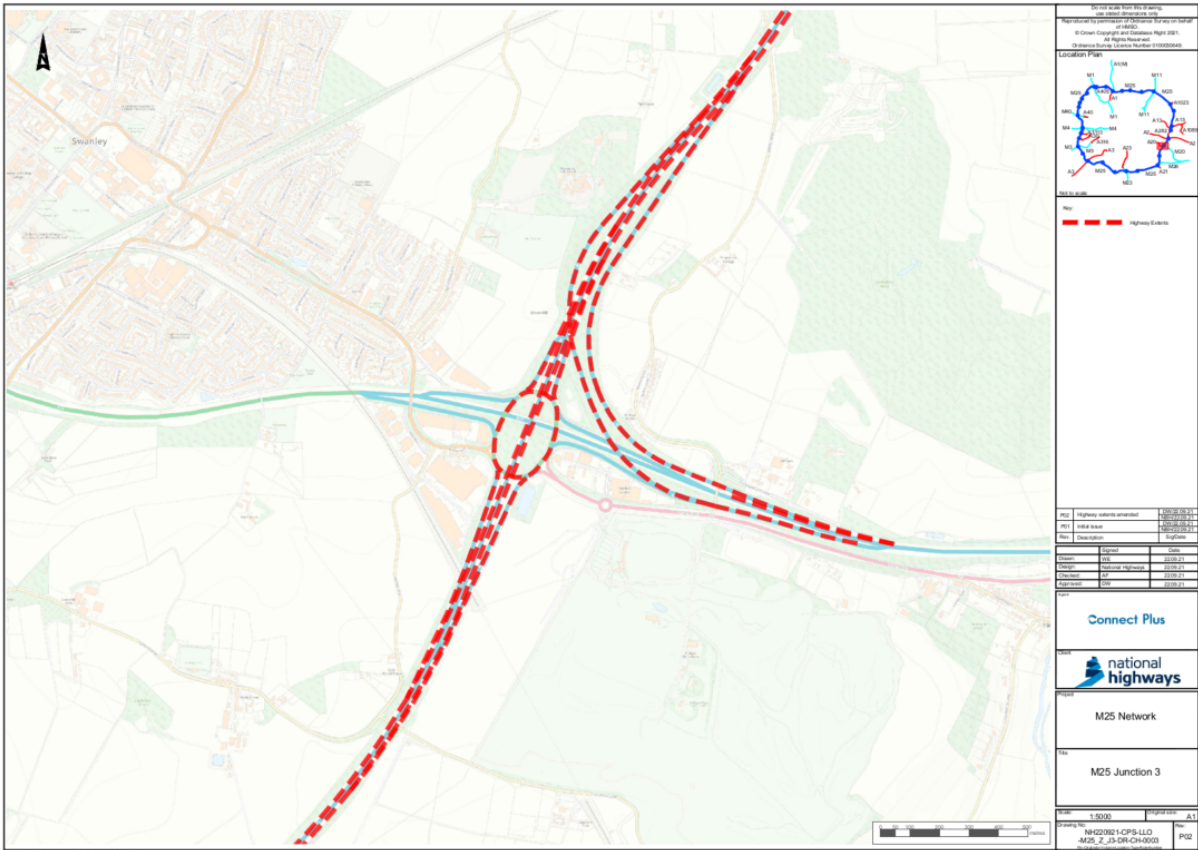
T: 0207 796 6047 / 0114 283 3312

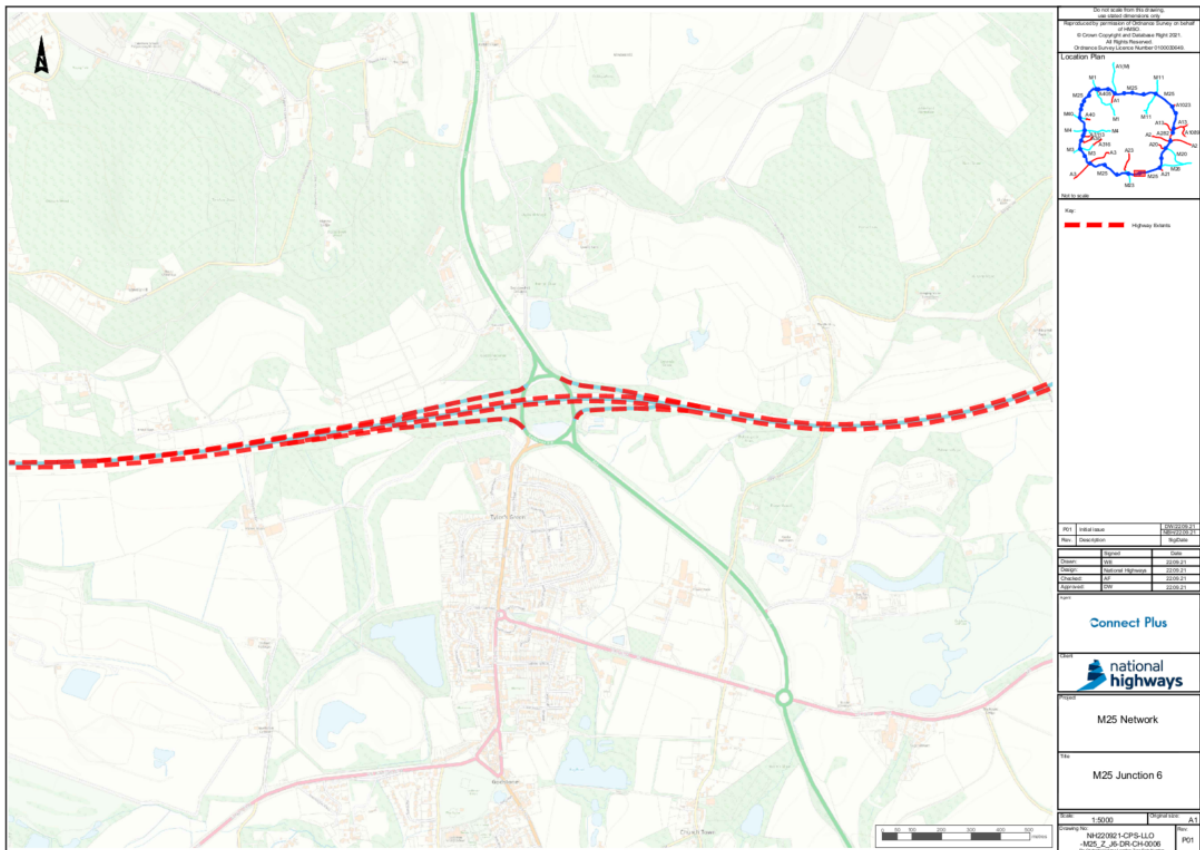
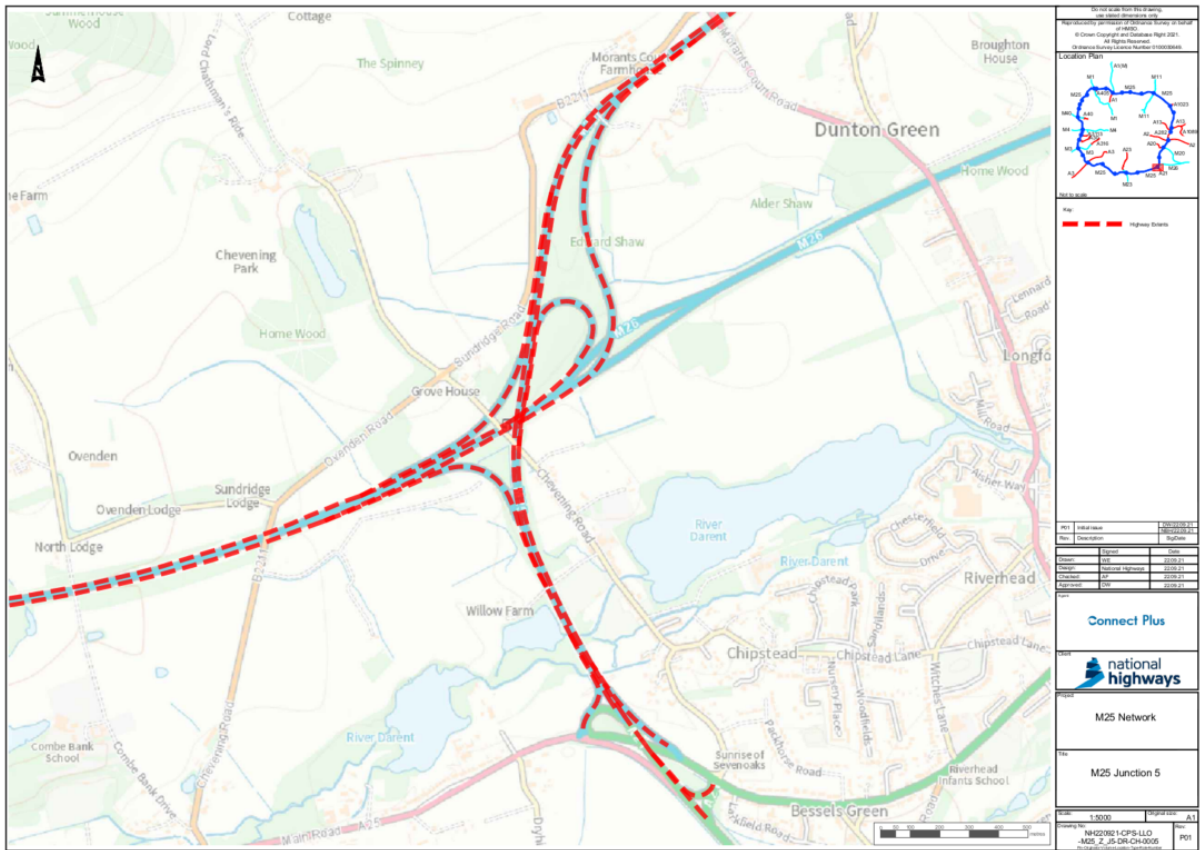
BY THE COURT

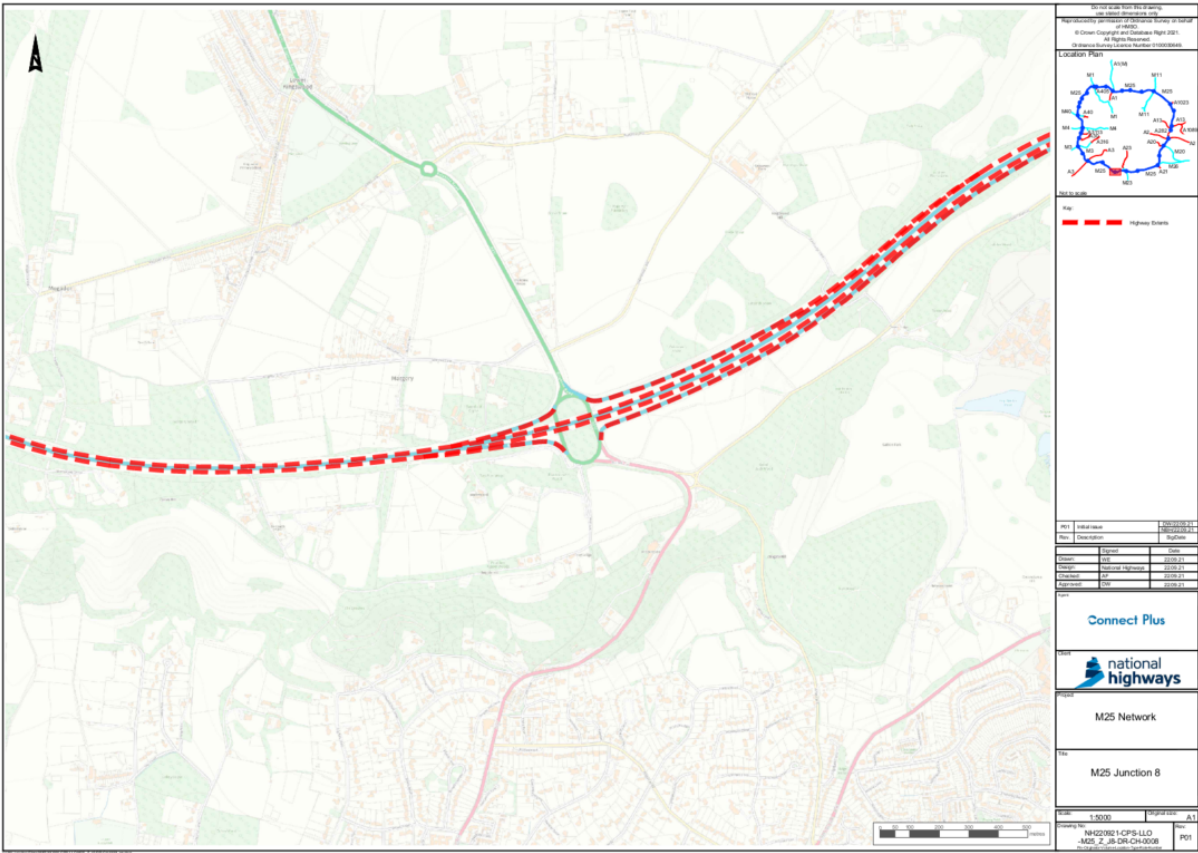
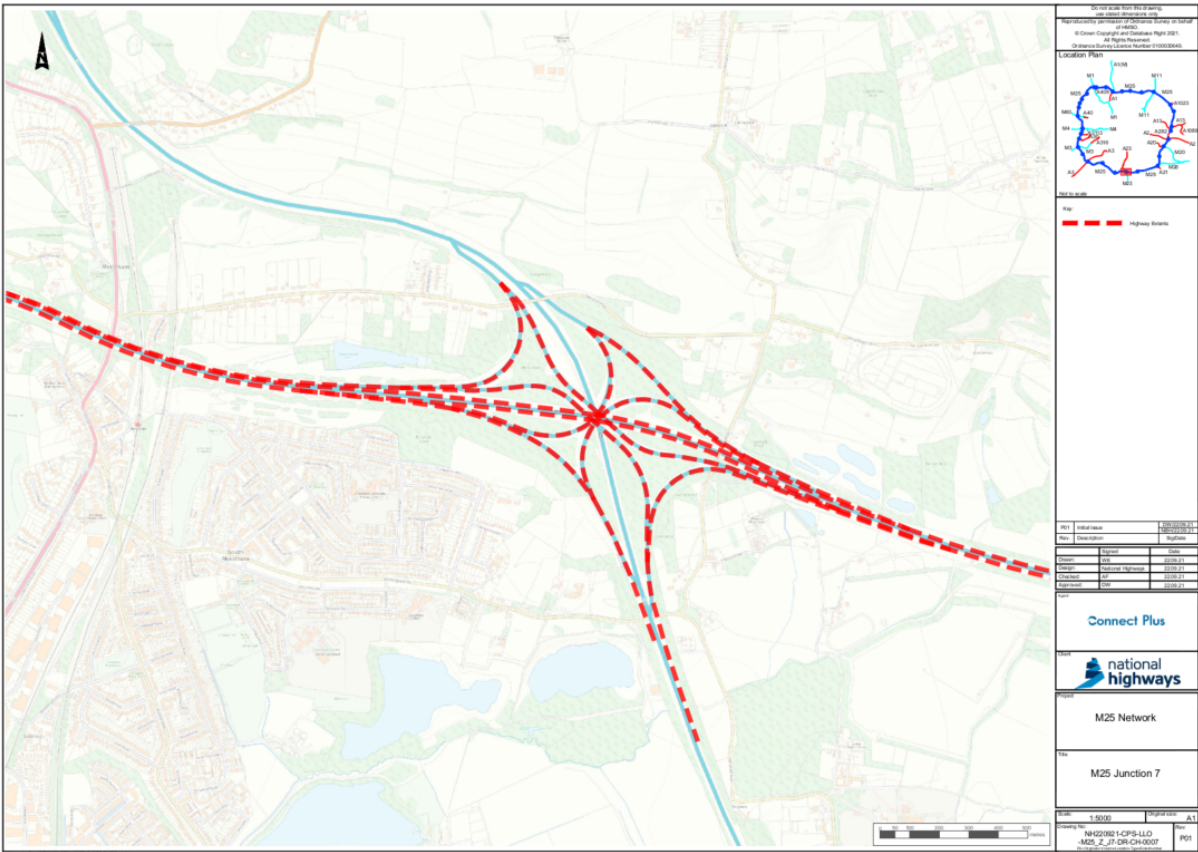
MADE ON 26 April 2024

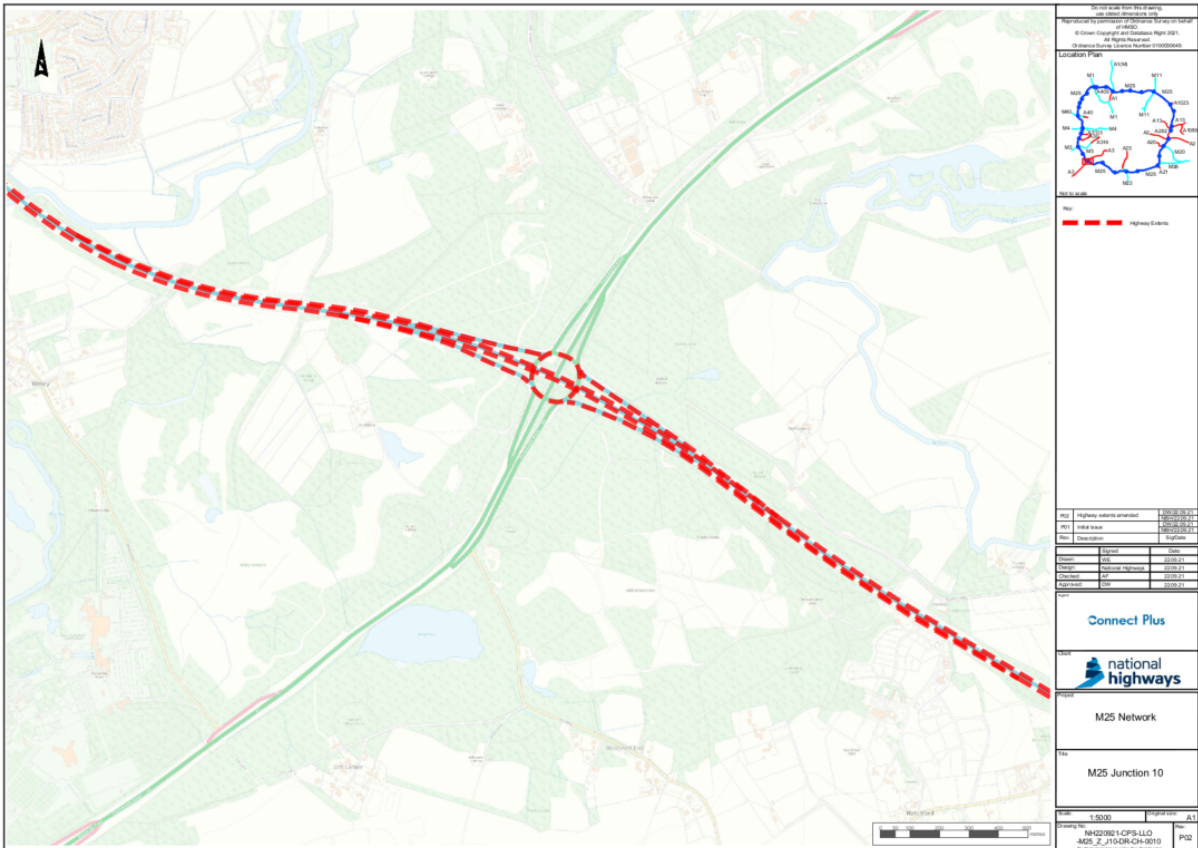
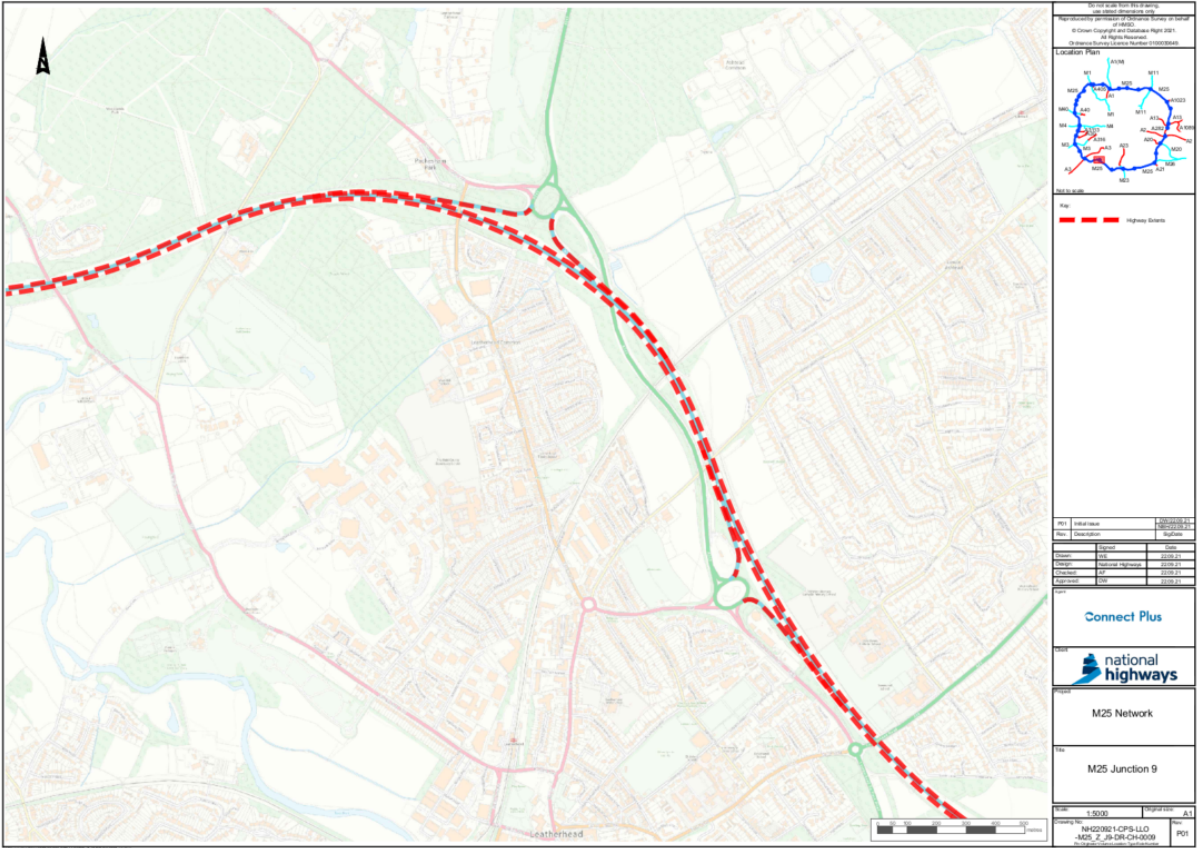
APPENDIX 1

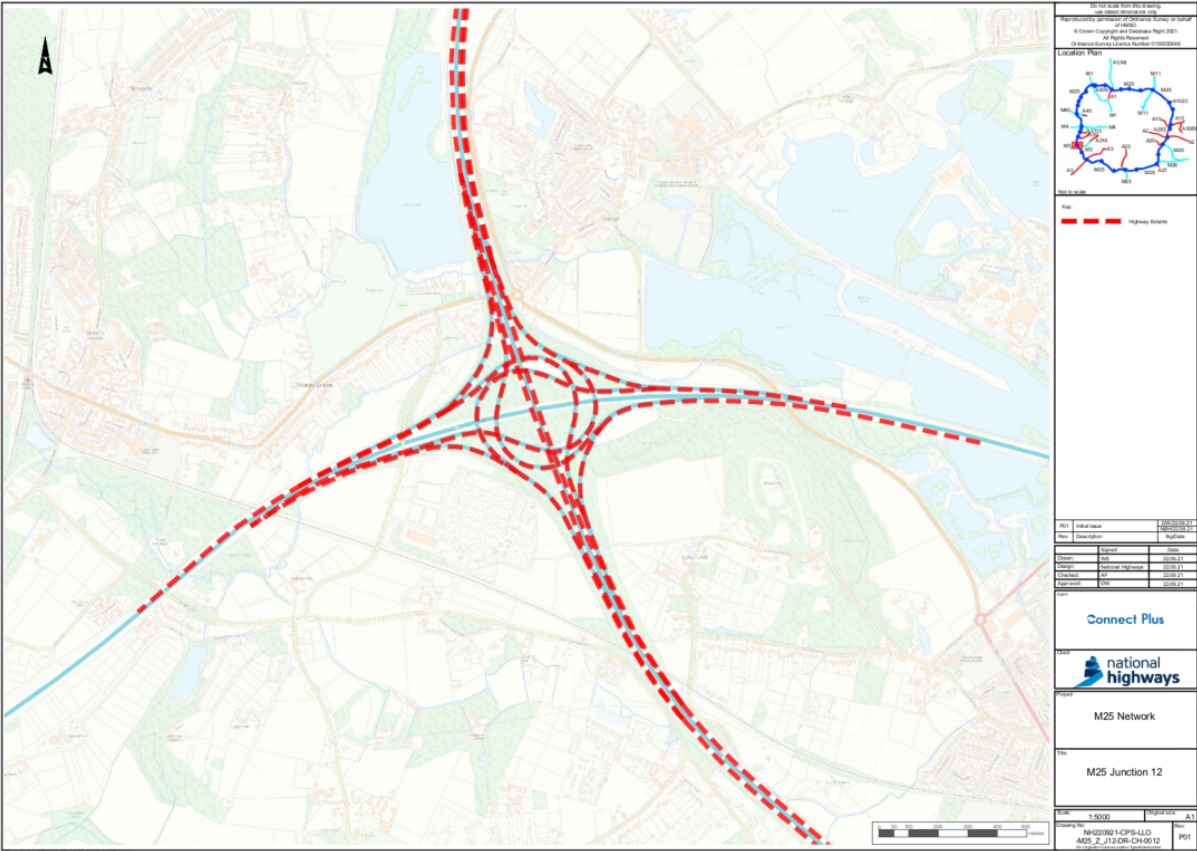
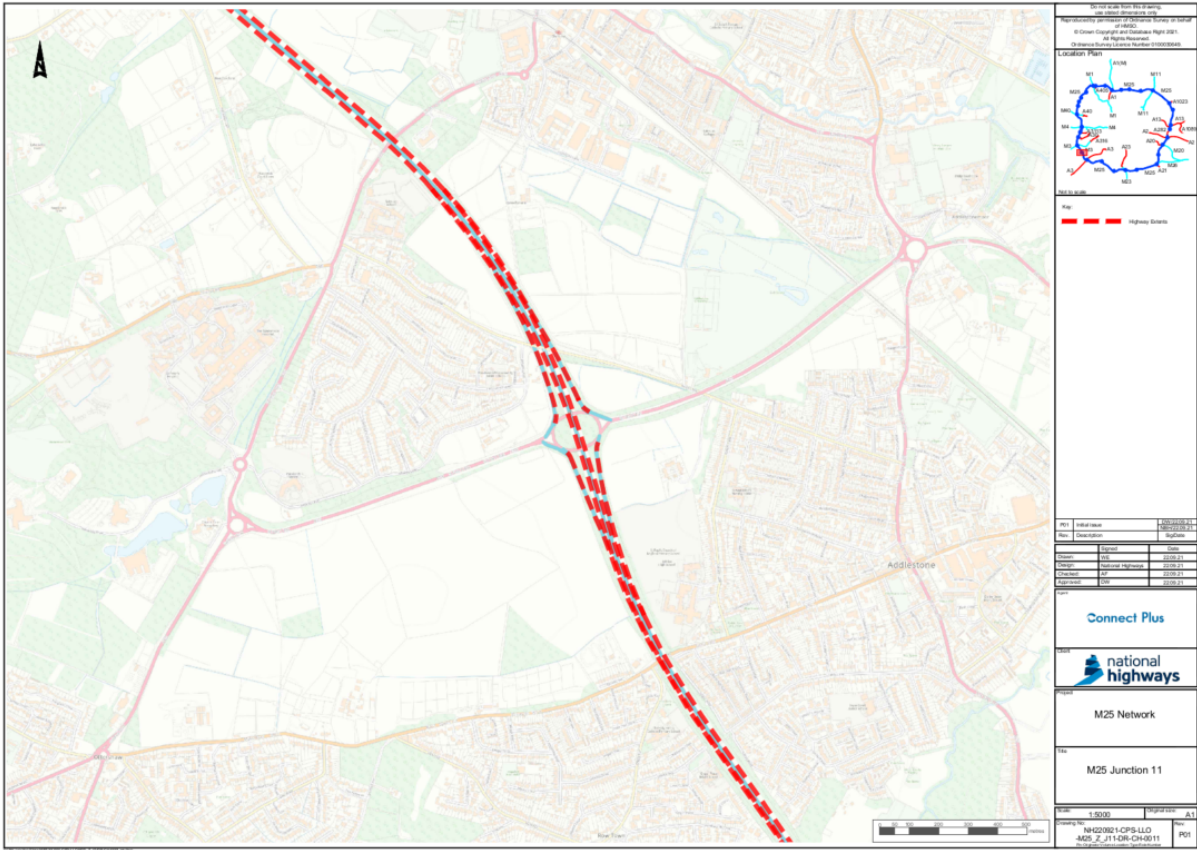


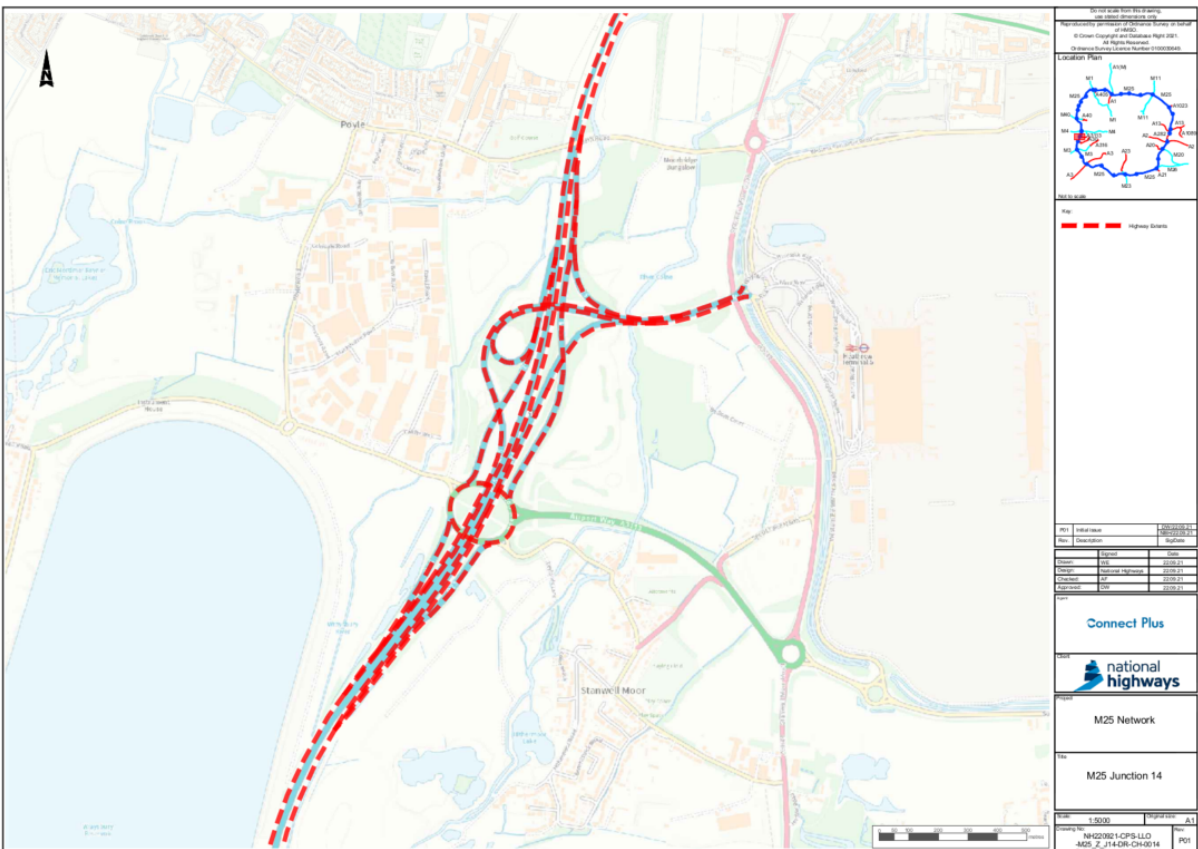


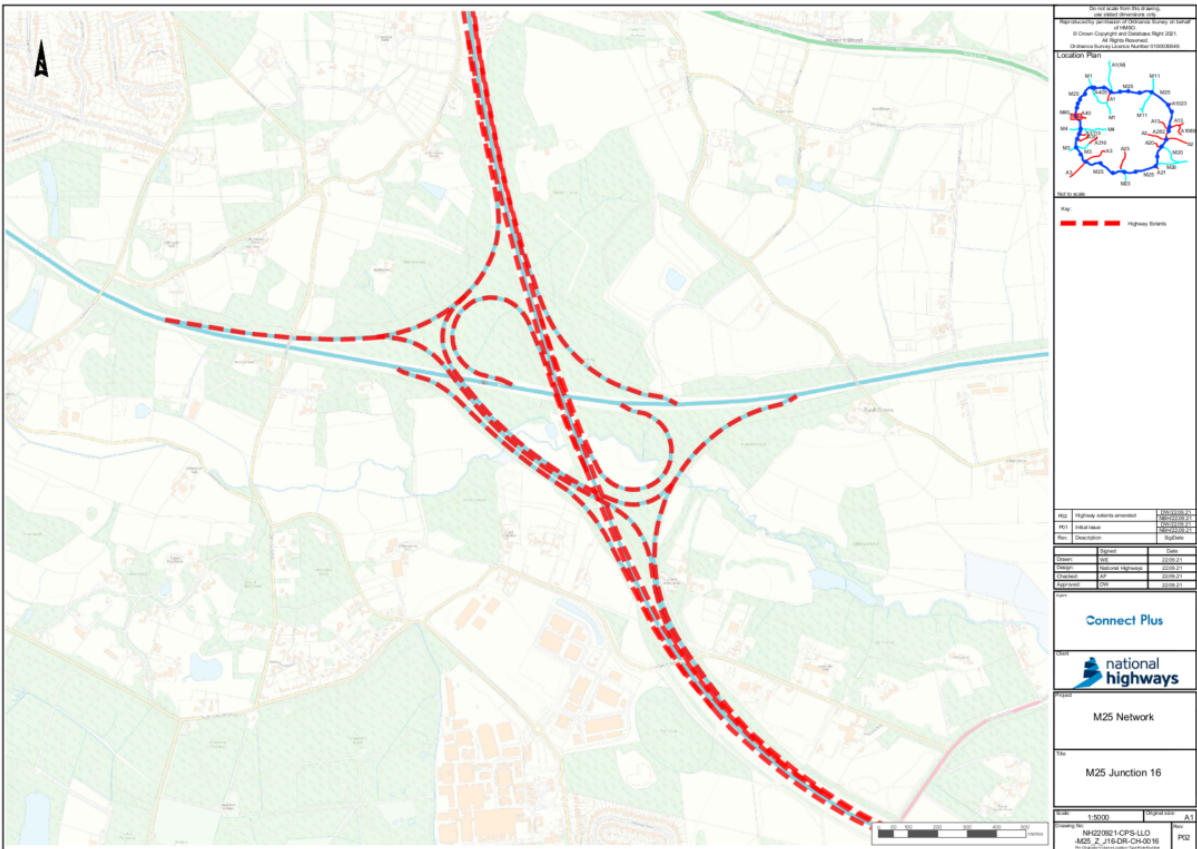
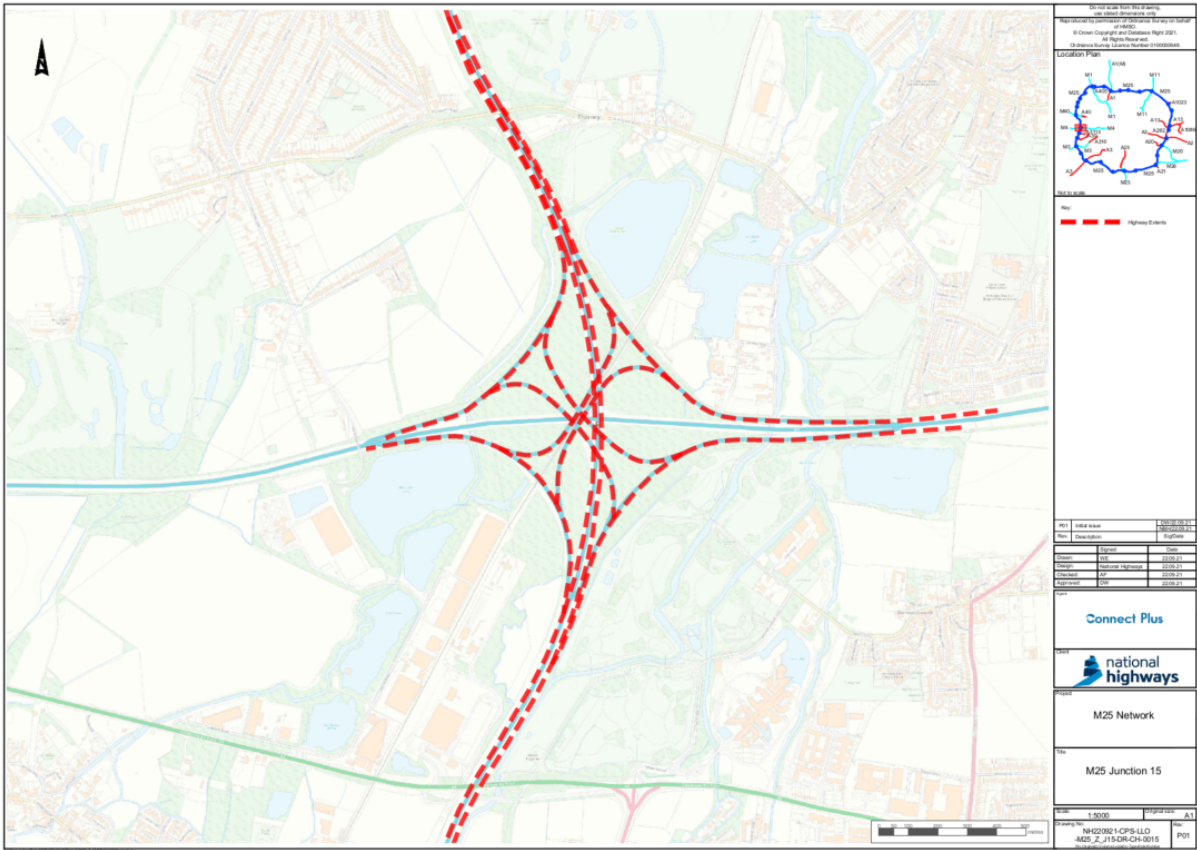


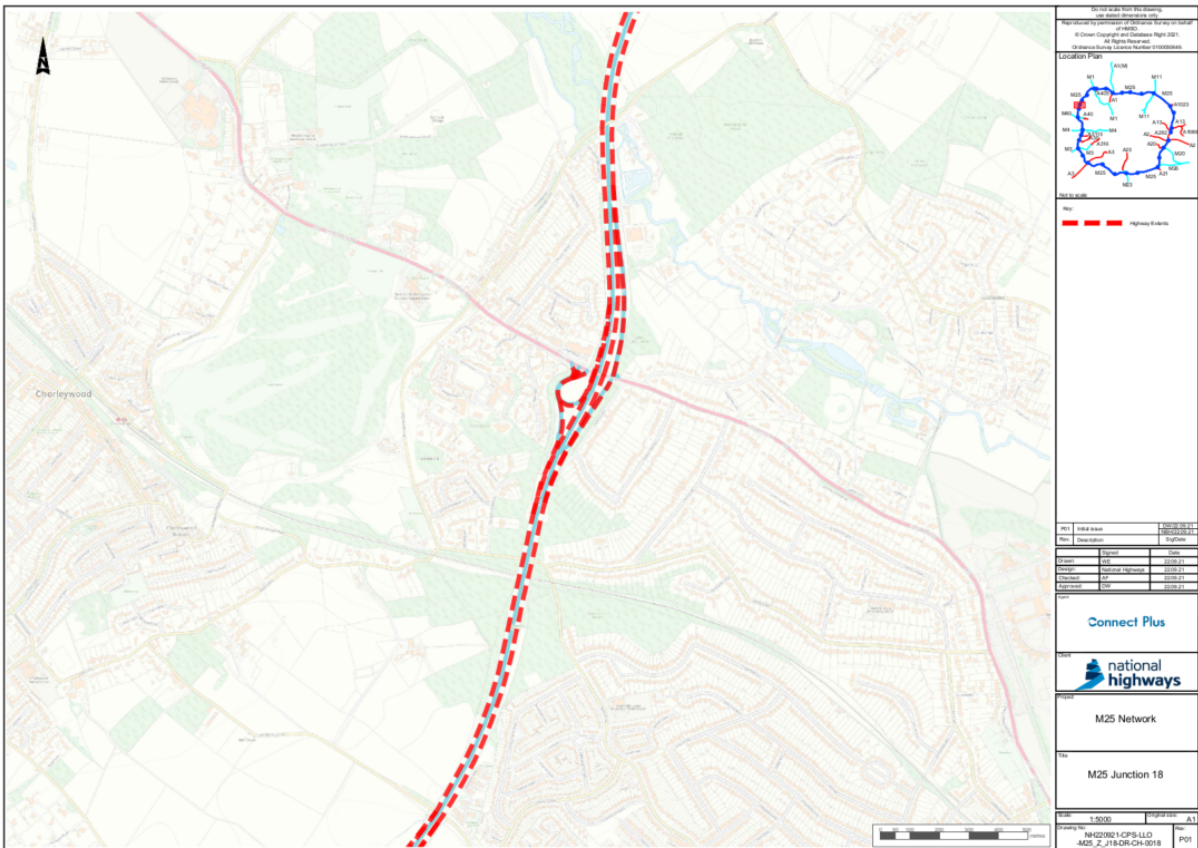
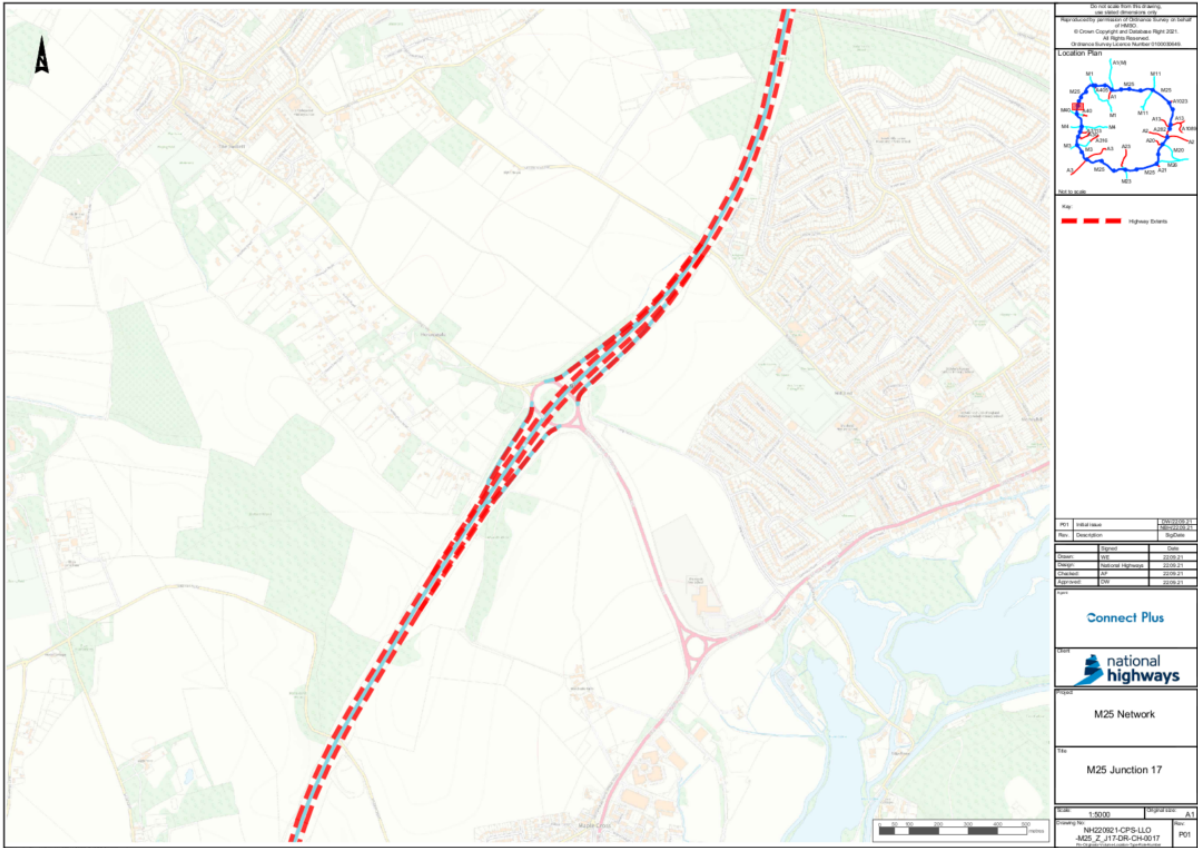


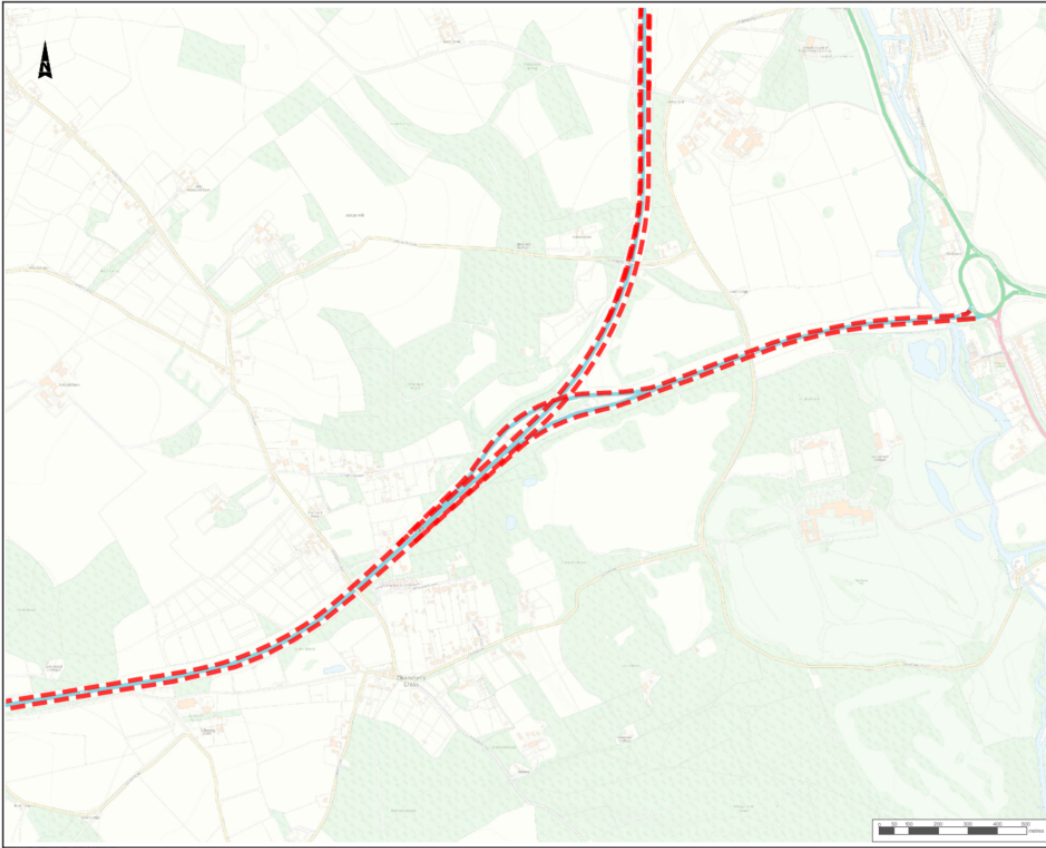












© Crown Copyright and Database Right 2021. All Rights Reserved. Ordnance Survey Licence Number: 100030968.

Location Plan

M11 Information: 14/07/2024 14:14
 File: Junction 19
 Date: 2024-21
 Project: National Highways
 Version: 1.0
 Author: JCB

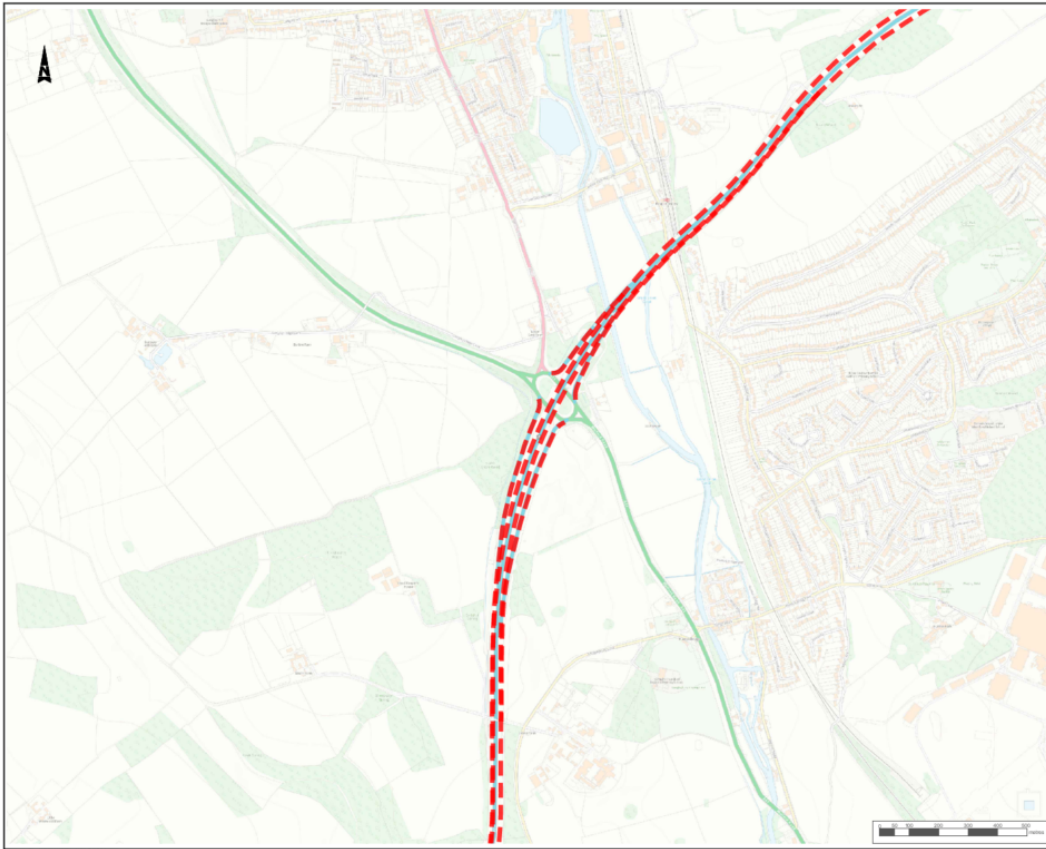
Connect Plus

national highways

M25 Network

M25 Junction 19

Scale: 1:5000 | Sheet: A1
 Drawing No: NH22082-1-CPS-LLO | M25_Z_19-DR-CH-0019 | P01



© Crown Copyright and Database Right 2021. All Rights Reserved. Ordnance Survey Licence Number: 100030968.

Location Plan

M11 Information: 14/07/2024 14:14
 File: Junction 20
 Date: 2024-21
 Project: National Highways
 Version: 1.0
 Author: JCB

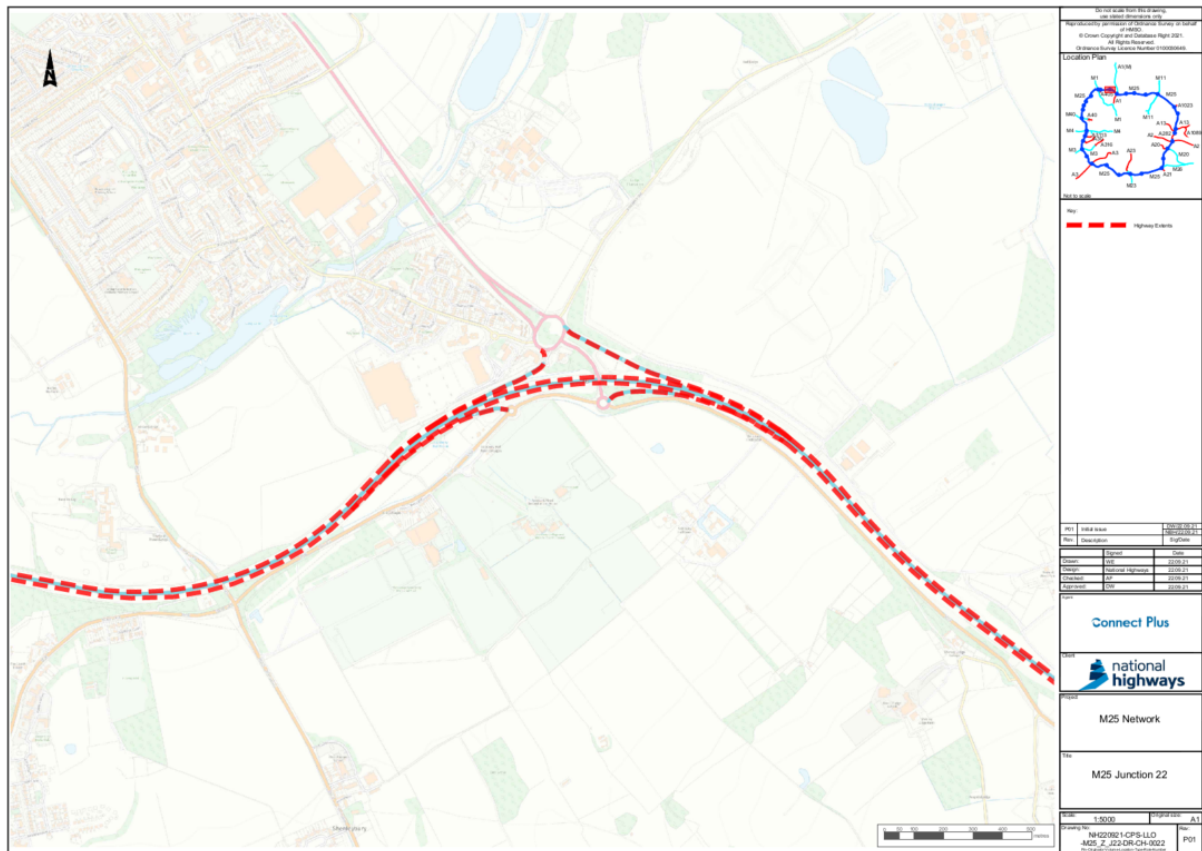
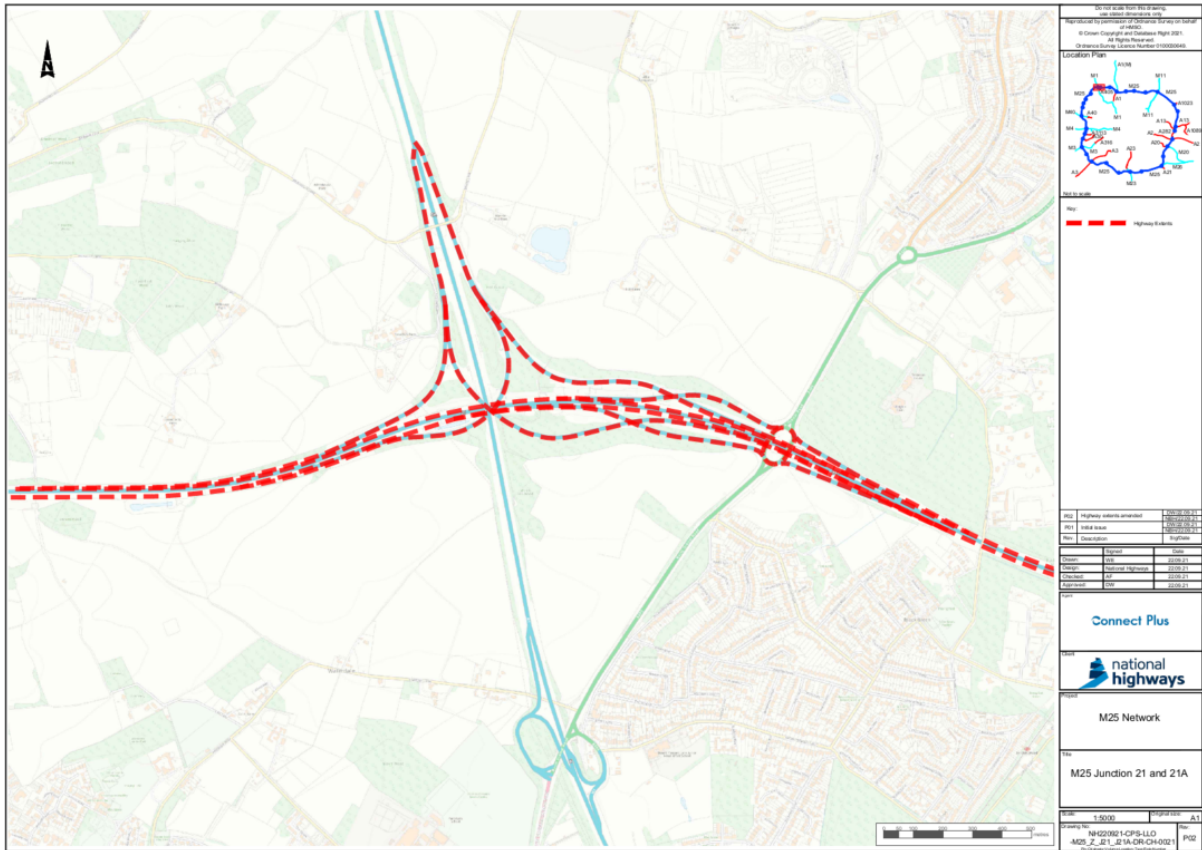
Connect Plus

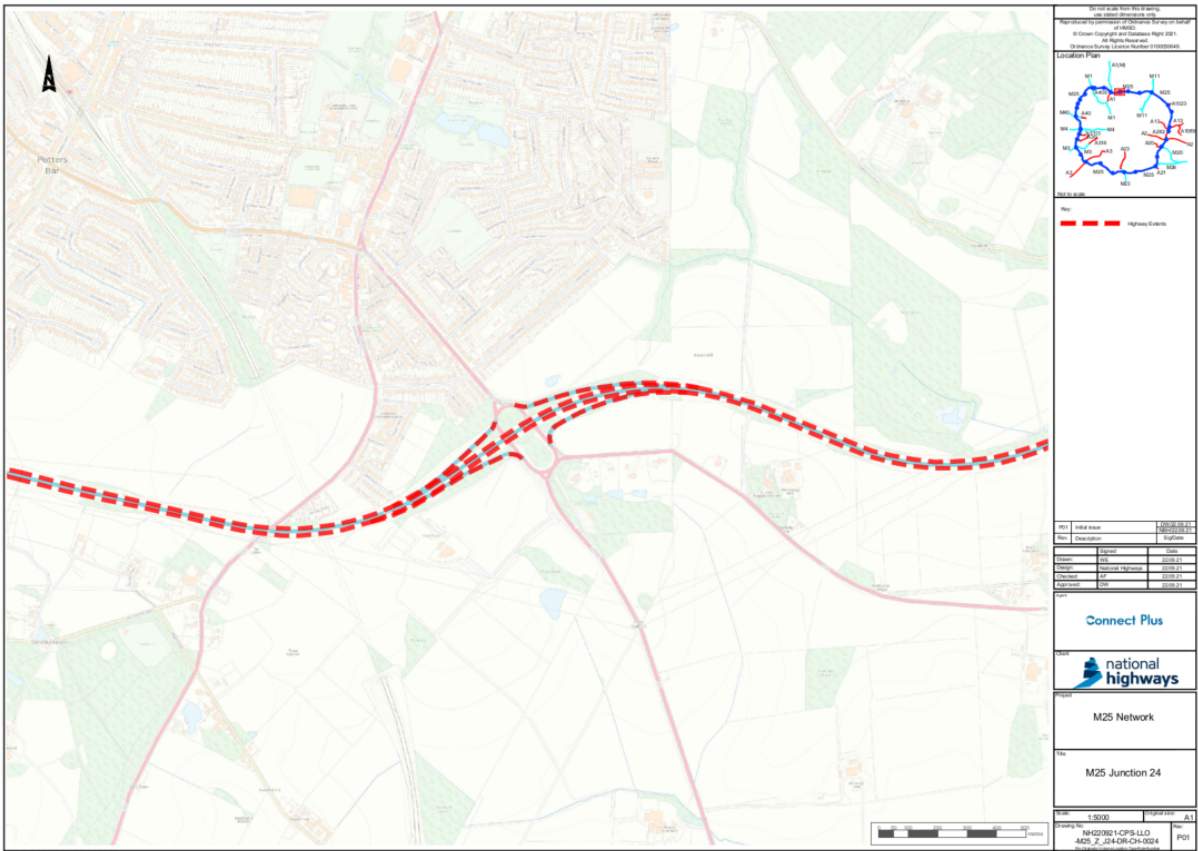
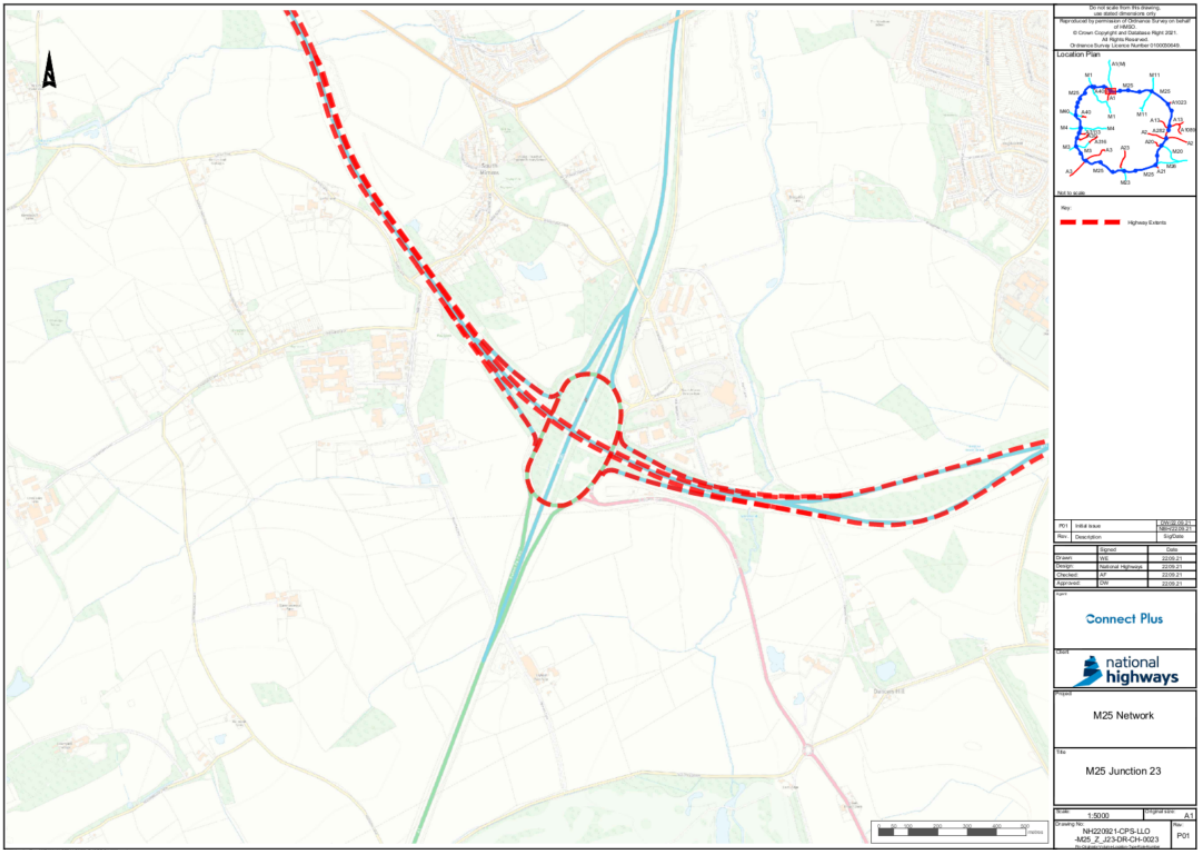
national highways

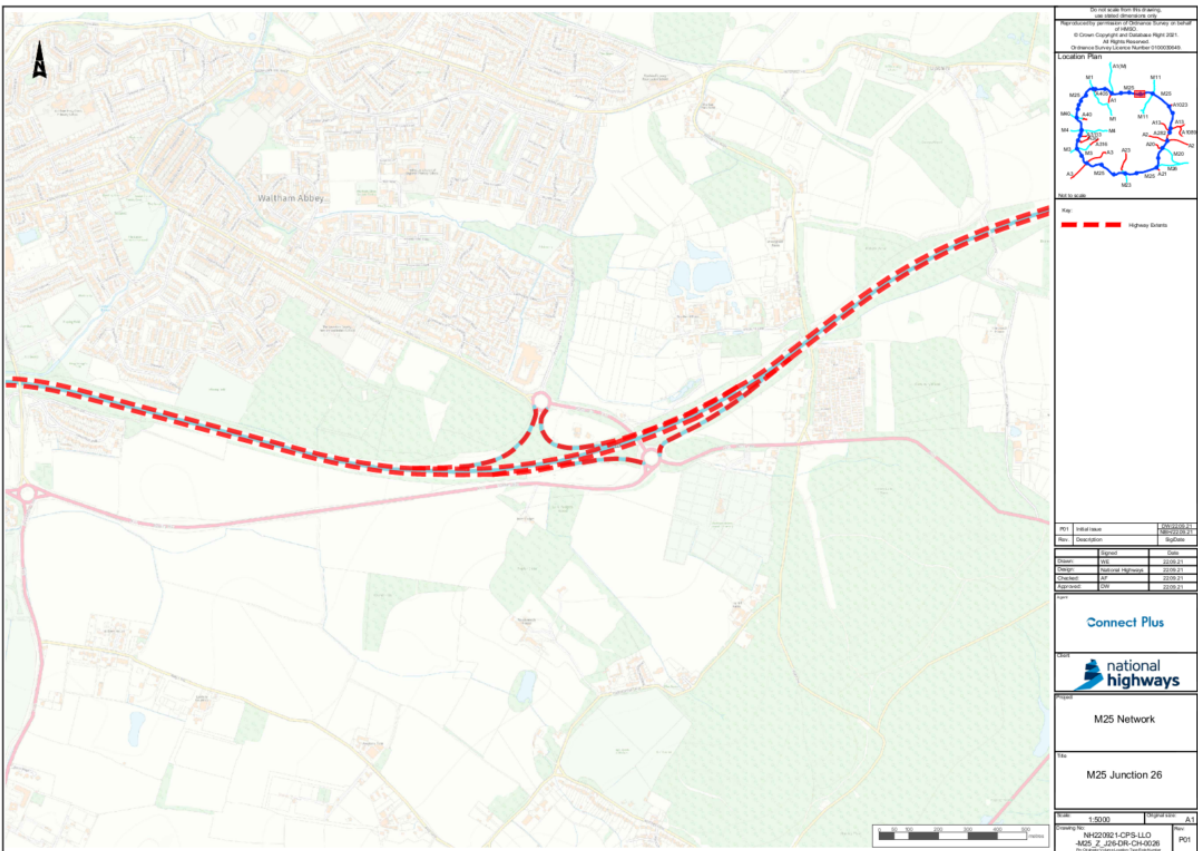
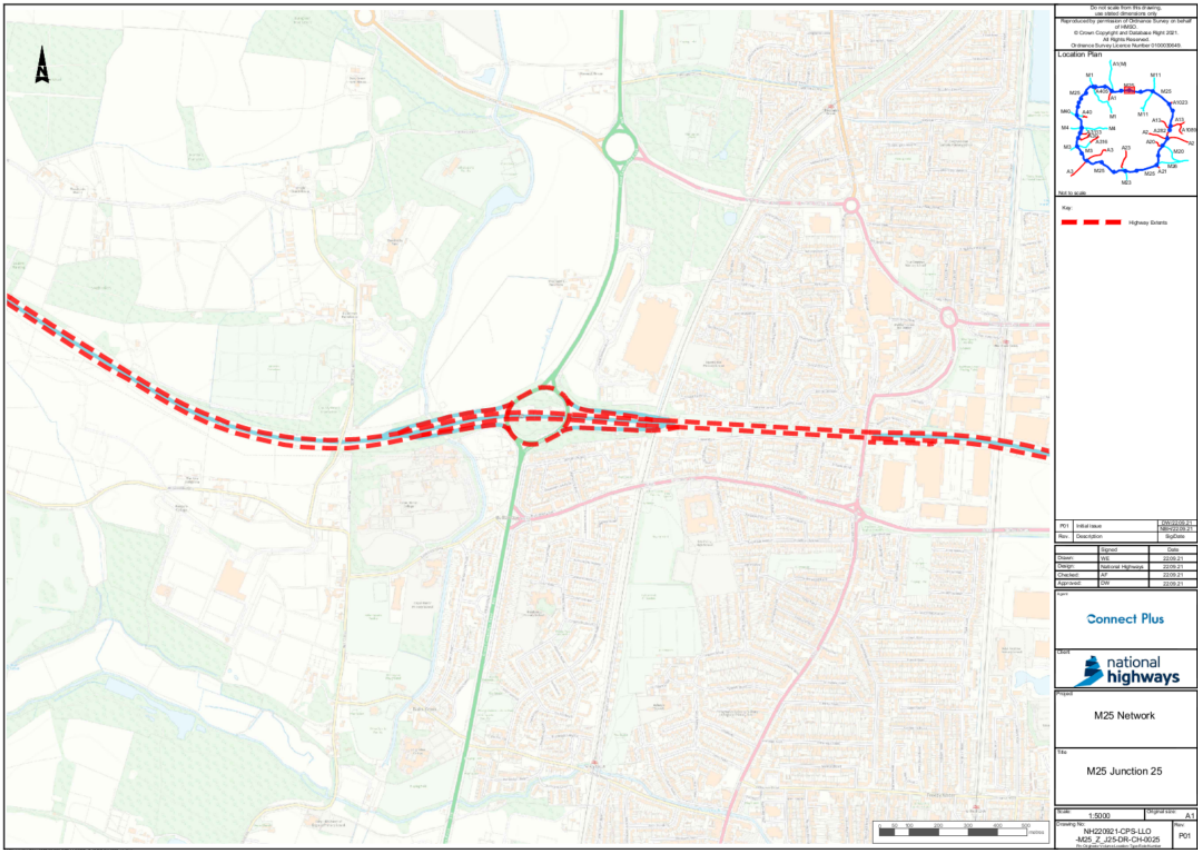
M25 Network

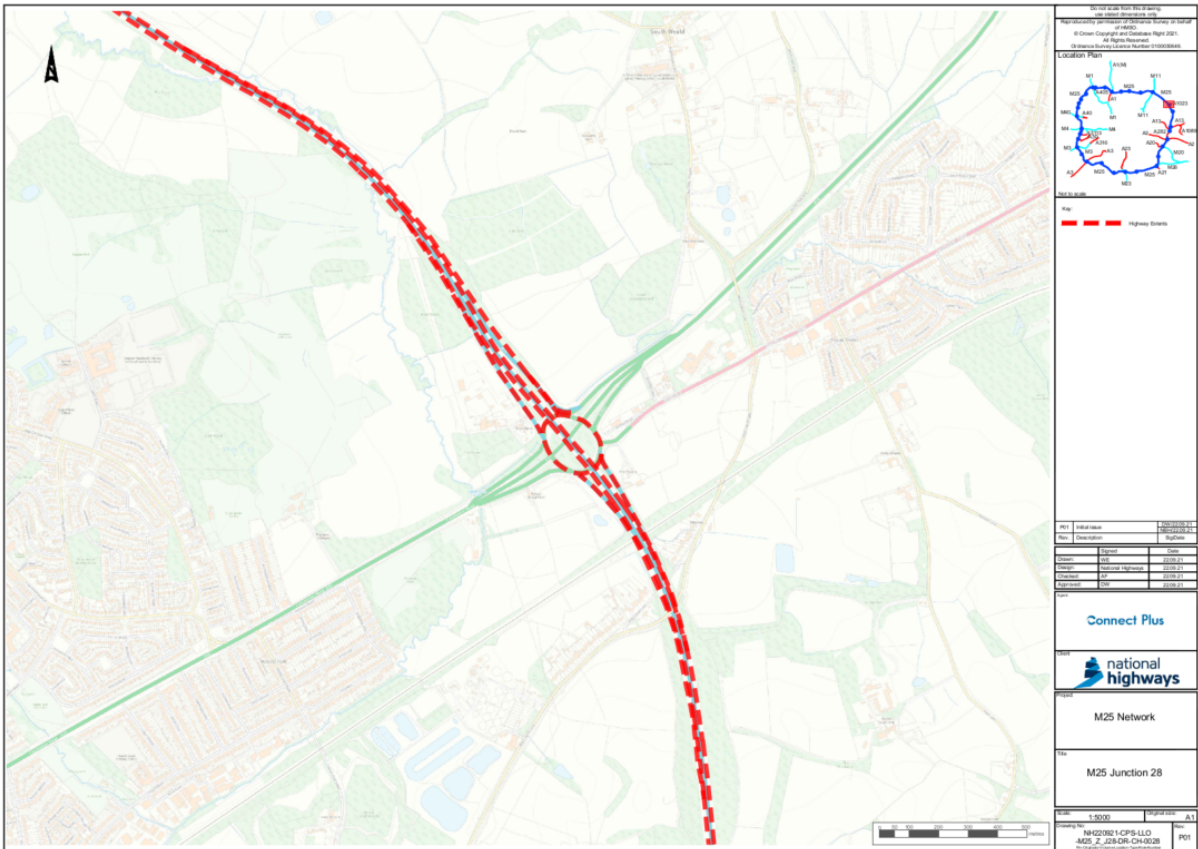
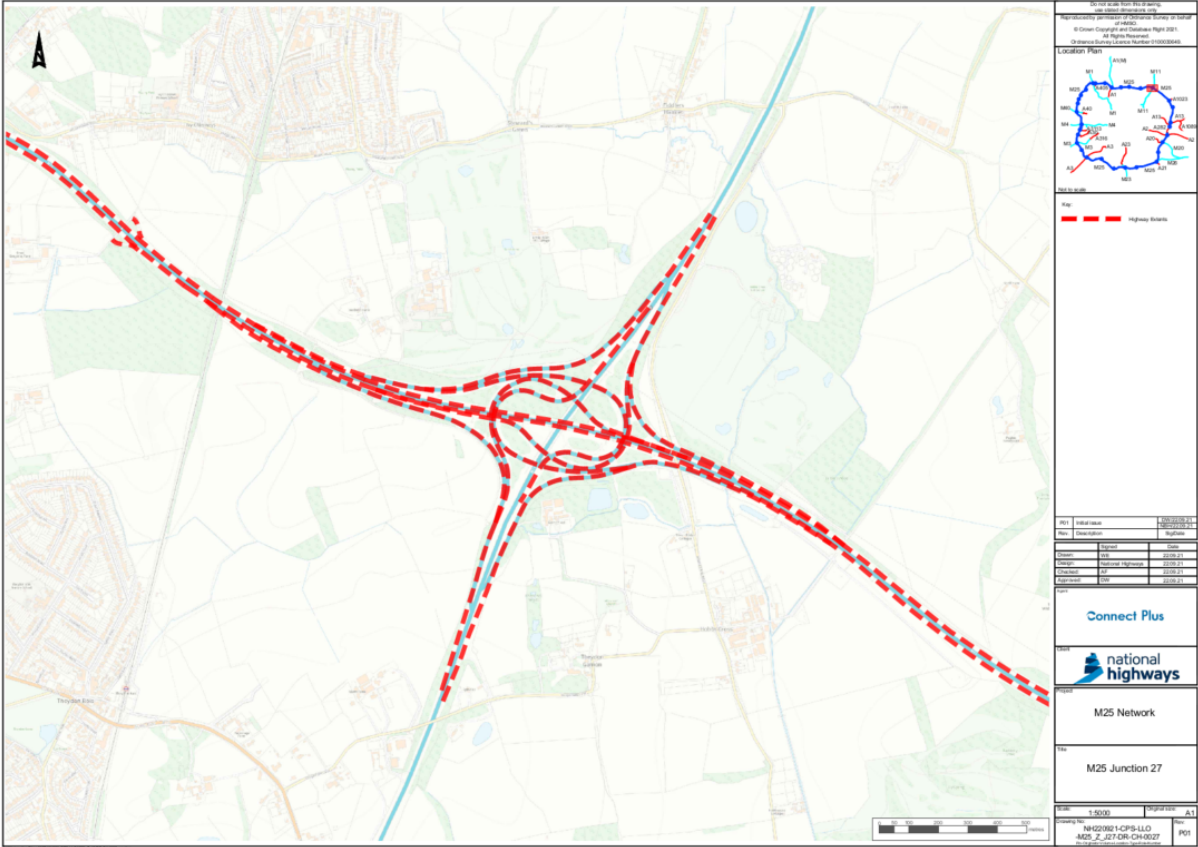
M25 Junction 20

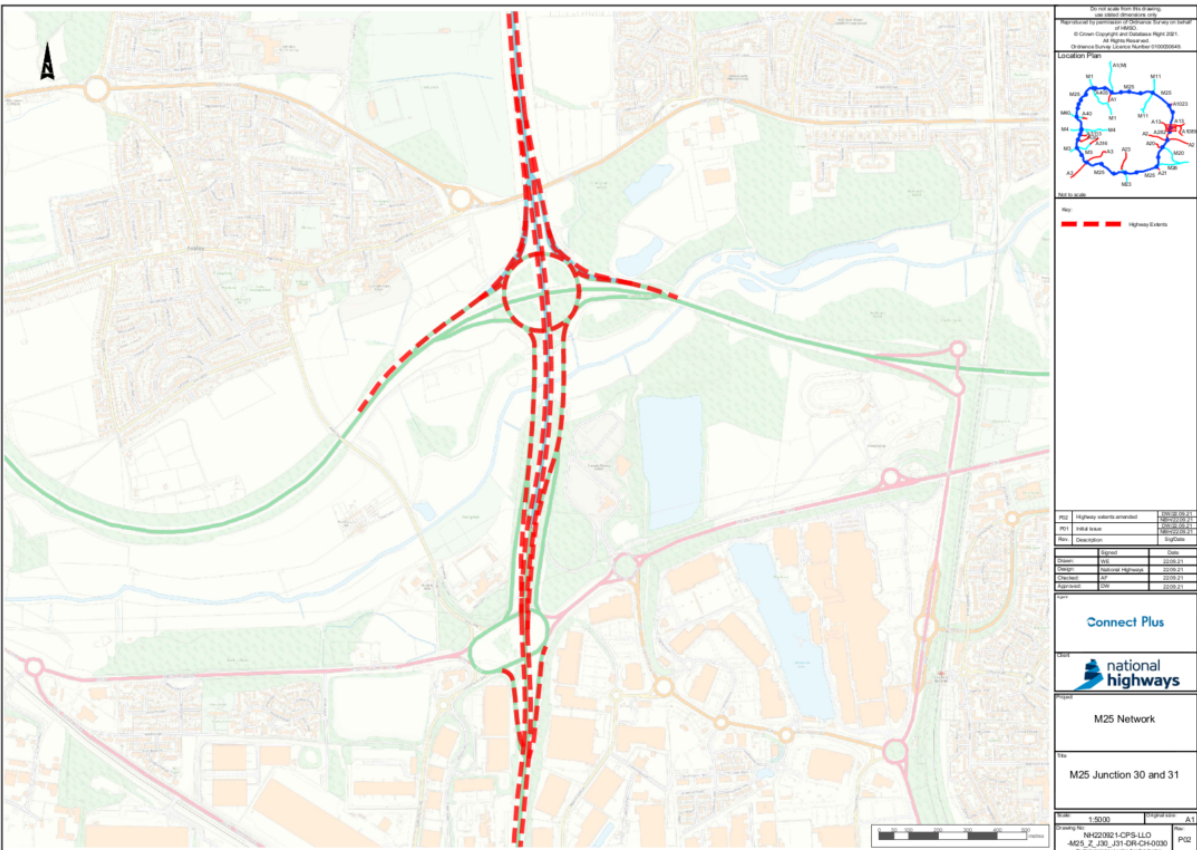
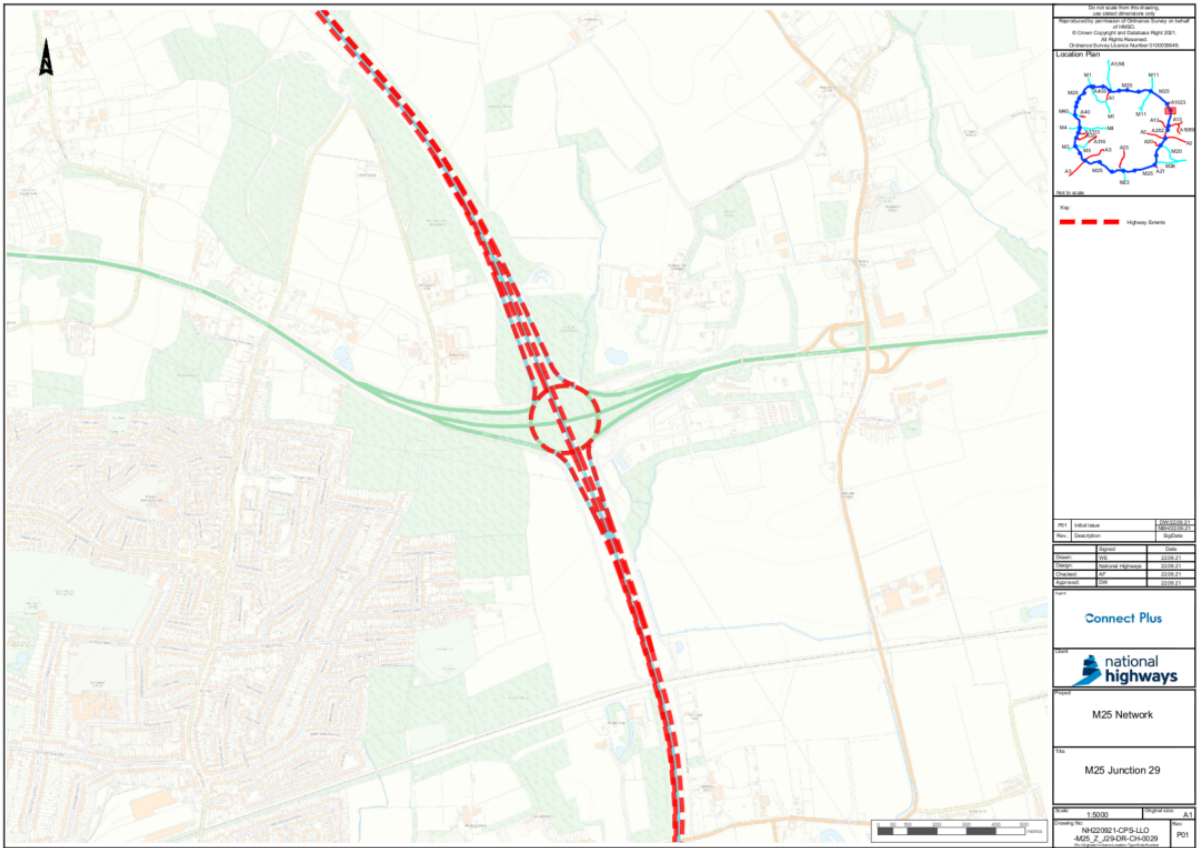
Scale: 1:5000 | Sheet: A1
 Drawing No: NH22082-1-CPS-LLO | M25_Z_20-DR-CH-0020 | P01





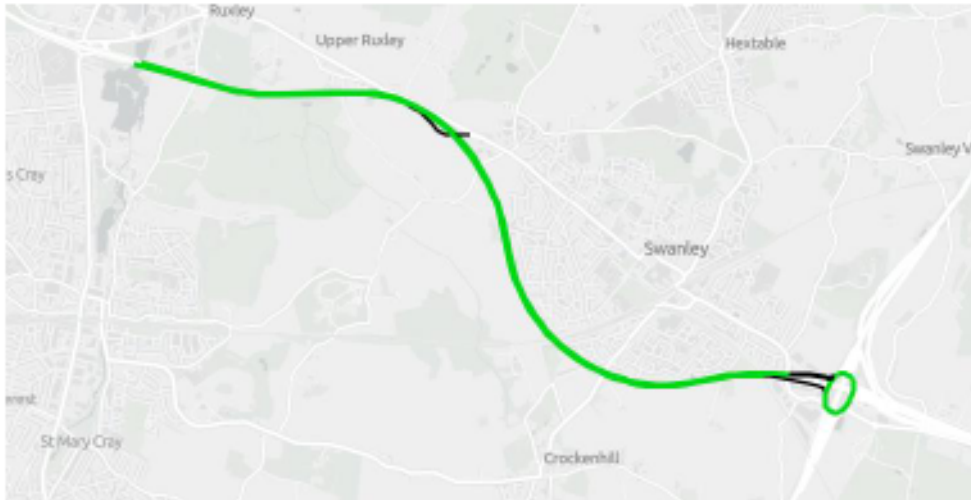




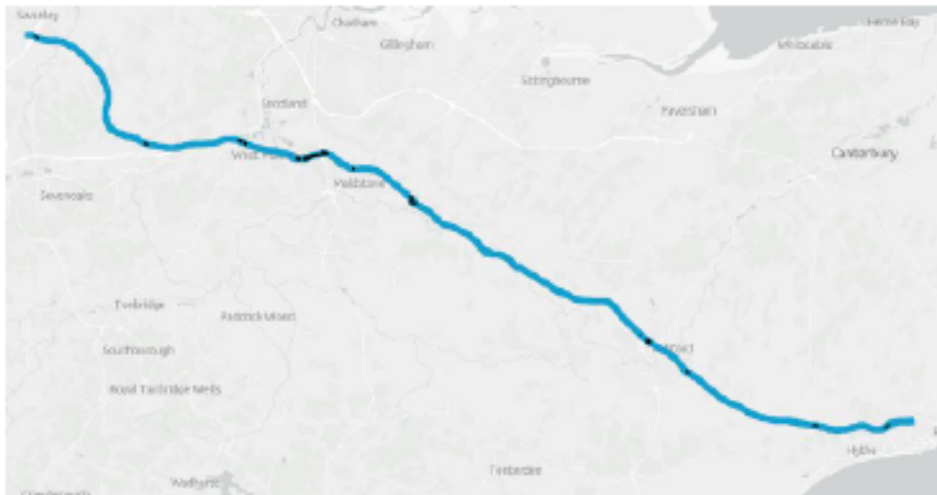


APPENDIX 2

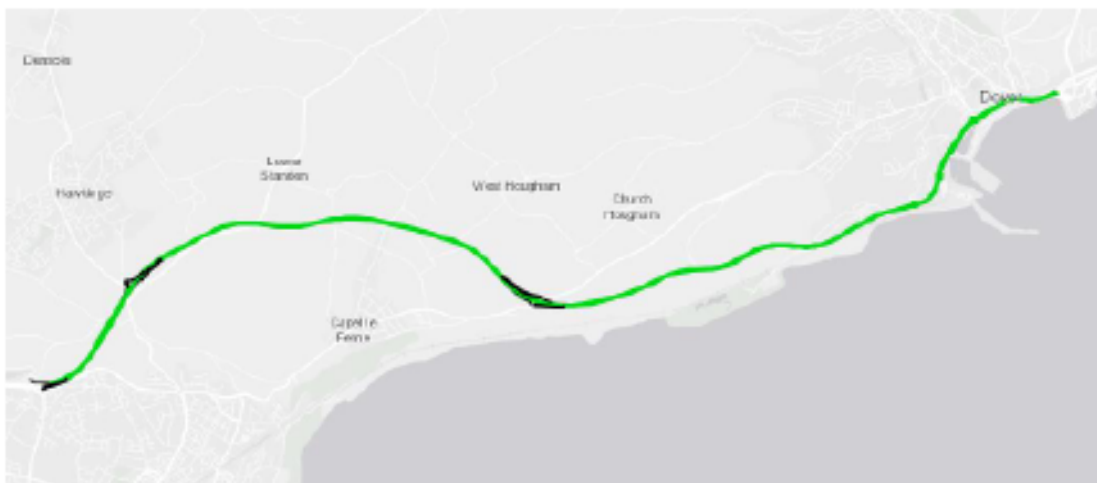
A20 London - M25



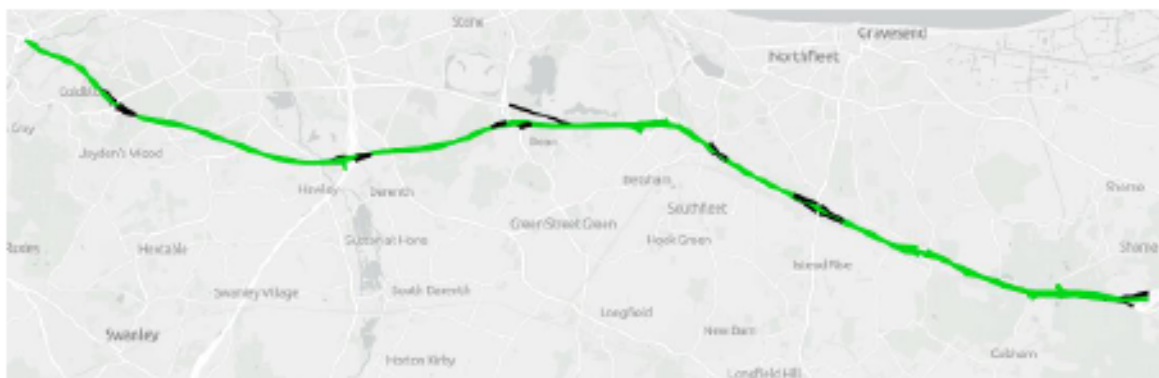
M20



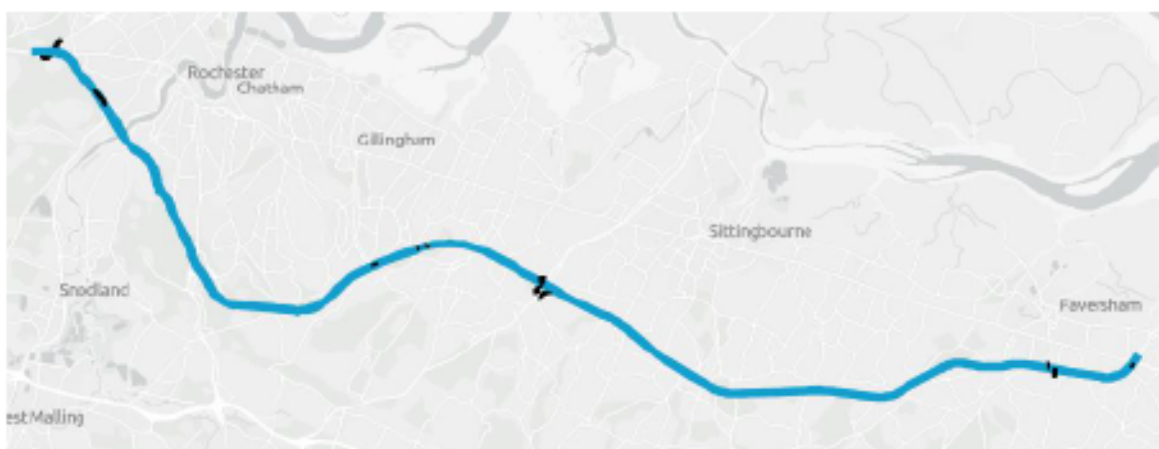
A20 Coast Section



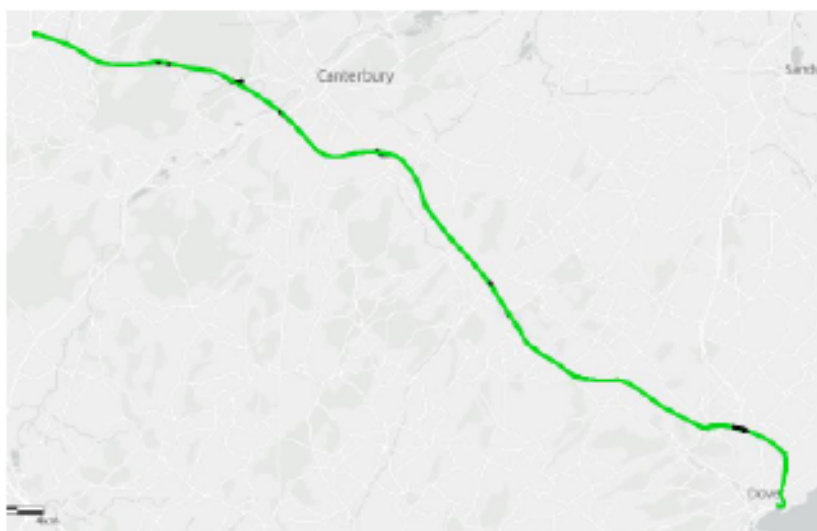
A2 London – M2 Section



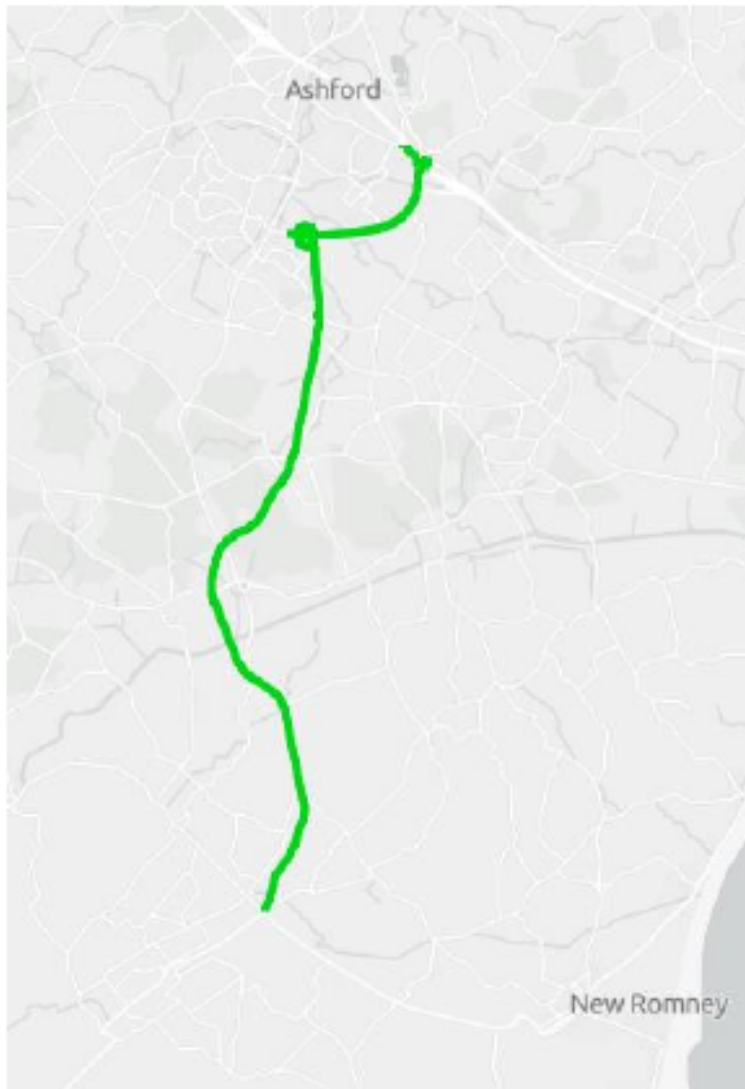
M2



A2 M2 - Dover Section



A2070

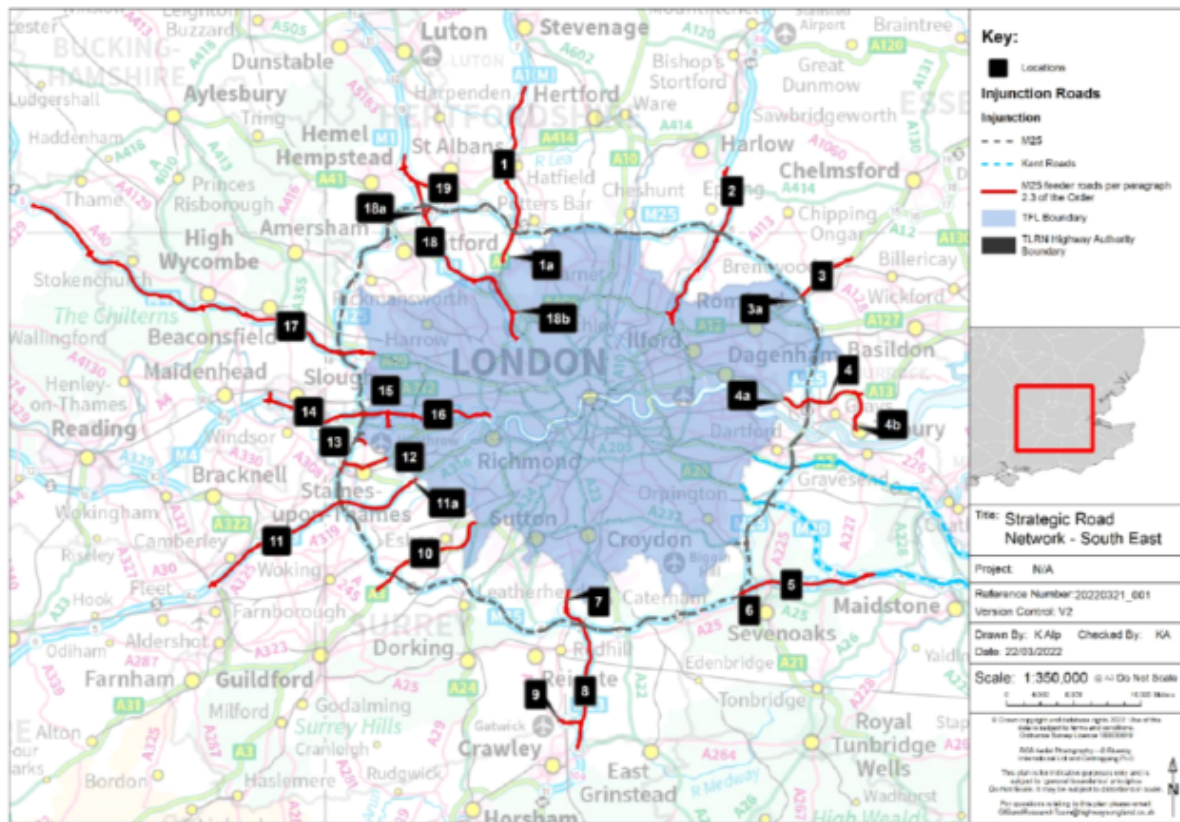


Kent & Surrounding areas SRN



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

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

51.	Not used	
52.	Karen WILDIN	
53.	Liam NORTON	
54.	Louis MCKECHNIE	
55.	Not used	
56.	Not used	
57.	Not used	
58.	Not used	
59.	Not used	
60.	Not used	
61.	Not used	
62.	Not used	
63.	Not used	
64.	Not used	
65.	Not used	
66.	Not used	
67.	Not used	
68.	Not used	

69.	Not used	
70.	Not used	
71.	Not used	
72.	Not used	
73.	Not used	
74.	Not used	
75.	Not used	
76.	Not used	
77.	Not used	
78.	Not used	
79.	Not used	
80.	Not used	
81.	Not used	
82.	Not used	
83.	Not used	
84.	Not used	
85.	Not used	
86.	Not used	

87.	Not used	
88.	Not used	
89.	Not used	
90.	Not used	
91.	Not used	
92.	Not used	
93.	Stephen Charles GOWER	
94.	Not used	
95.	Not used	
96.	Not used	
97.	Not used	
98.	Not used	
99.	Not used	
100.	Tessa-Marie BURNS	
101.	Theresa NORTON	
102.	Not used	
103.	Not used	
104.	Tracey MALLAGHAN	

105.	Not used	
106.	Not used	
107.	Not used	
108.	Not used	
109.	Not used	
110.	Not used	
111.	Not used	
112.	Not used	
113.	Not used	
114.	Not used	
115.	Not used	
116.	Not used	
117.	Not used	
118.	Not used	
119.	Not used	
120.	Not used	
121.	Not used	
122.	Not used	

123.	Not used	
124.	Not used	
125.	Not used	
126.	Not used	
127.	Not used	
128.	Not used	
129.	Not used	
130.	Not used	
131.	Not used	
132.	Not used	
133.	Not used	
134.	Not used	
135.	Not used	
136.	Morgan TROWLAND	
137.	Not used	
138.	Not used	
139.	Not used	
140.	Not used	

SCHEDULE 2

CHIEF CONSTABLES OF THE FORCES OF:

City of London Police

Metropolitan Police Service

Avon and Somerset Constabulary

Bedfordshire Police

Cambridgeshire Constabulary

Cheshire Constabulary

Cleveland Police

Cumbria Constabulary

Derbyshire Constabulary

Devon & Cornwall Police

Dorset Police

Durham Constabulary

Essex Police

Gloucestershire Constabulary

Greater Manchester Police

Hampshire Constabulary

Hertfordshire Constabulary

Humberside Police

Kent Police

Lancashire Constabulary

Leicestershire Police

Lincolnshire Police

Merseyside Police

Norfolk Constabulary

North Yorkshire Police

Northamptonshire Police

Northumbria Police

Nottinghamshire Police

South Yorkshire Police

Staffordshire Police

Suffolk Constabulary

Surrey Police

Sussex Police

Thames Valley Police

Warwickshire Police

West Mercia Police

West Midlands Police

West Yorkshire Police

Wiltshire Police

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



Share or comment on this article:

56
shares

[340 comments](#)

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.

ADVERTISEMENT

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.

TRENDING

ANDREW PIERCE: Sadiq Khan's £21million pay-per-mile scheme

833 viewing now

The congestion capital: London traffic is now worse than before ULEZ

990 viewing now

London Tube strike chaos with several stations shut

446 viewing now

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)

RELATED ARTICLES

[Aintree 2024 Ladies Day: Revellers get a very early start on day 2 of the festival as they compete for £5,000 Best Dressed prize](#)

[BBC News host undergoes major surgery and will be off air for MONTHS as they share a snap from their hospital bed](#)

Police launch investigation into claims Angela Rayner broke electoral law in the sale of her council house

Zendaya and Tom Holland continue to silence split rumours as they lark around following the actress' 'surreal' TV appearance in London

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

ADVERTISEMENT

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.'

ADVERTISEMENT

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

RELATED ARTICLES

[Britain's newest tourist attraction... a truck stop on the M1! Visitors flock to motorway service station for cheap pints and home-cooked food after it was named the best facility in Europe](#)

Sienna Miller, 42, looks incredible in a purple bikini as she holidays with boyfriend Oli Green, 27, in Costa Rica - three months after welcoming their first child together

Queen Mary of Denmark cuts a frosty figure as she looks away from King Frederik on skiing trip to Verbier

Hey, no monk-y business! Moment husband catches his politician wife, 45, in bed with their adopted Buddhist monk SON, 24, in scandal that has rocked Thailand

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](#)

ADVERTISEMENT

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

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

56
shares

[Comments](#)

MOST READ NEWS

344 **116**



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.

← Previous Post

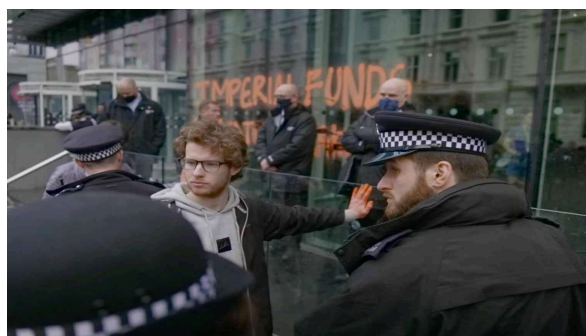
Next Post →

Related Posts




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


Press / February 14, 2022




Two Students Spray Paint Three London Universities As Part of 'Just Stop Oil' Campaign

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

348 120

 947

 178

 359

 5





Just Stop Oil 

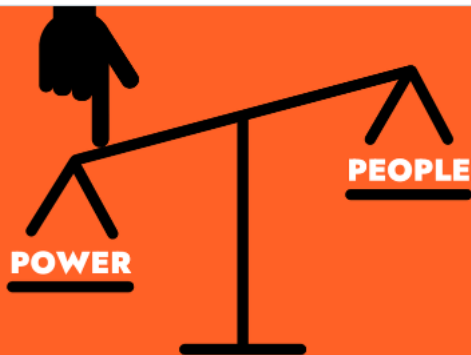
@JustStop_Oil



? 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

349 121



37



55



103



5





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



Just Stop Oil @JustStop_Oil · 19h

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.

2

6

10

350



Just Stop Oil @JustStop_Oil · 19h

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

2

5

8

349



Just Stop Oil @JustStop_Oil · 19h

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

1

6

8

362



Just Stop Oil @JustStop_Oil · 19h

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

2.8K



Just Stop Oil @JustStop_Oil · 19h

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

2

8

12

2.7K



350 122

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.



© PA



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.



-
-
-
-
-
- Copy link to paste in your message
-

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**

DLA Piper UK LLP
1 St Paul's Place
Sheffield
S1 2JX
United Kingdom
Tel: +44 114 283 3084
Fax: +44 114 283 3393

Ref: LNH/LNH/439241/15/UKM/133376758.5
Solicitors for the Claimant

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

**Before: Mr Justice Lavender
On: 21 September 2021**

B E T W E E N:

NATIONAL HIGHWAYS LIMITED

Claimant

-and-

**(1) PERSONS UNKNOWN CAUSING THE BLOCKING, ENDANGERING,
SLOWING DOWN, OBSTRUCTING OR OTHERWISE PREVENTING THE FREE
FLOW OF TRAFFIC ONTO OR ALONG THE M25 MOTORWAY FOR THE
PURPOSE OF PROTESTING**

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

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



UPON the Claimant’s claim in trespass, nuisance and under the Highways Act 1980 by Claim Form dated 21 September 2021 (“the Claim”)

AND UPON READING the Claim Form and the supporting evidence

AND UPON hearing Michael Fry and Jonathan Welch, Counsel for the Claimant

AND UPON the Claimant undertaking to pay the relevant court fees and to provide any witness statement(s) supporting the Claim within 48 hours of the sealing of this Order

AND UPON the Claimant indicating that it will provide to the Defendants copies of further evidence or other documents filed in these proceedings upon request, following the Defendants or their representatives providing contact details to the Claimant’s solicitors

AND UPON the Court accepting the Claimant’s undertaking that the Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss

AND UPON the Claimant undertaking to identify and name Defendants and apply to add them as named Defendants to this Order as soon as reasonably practicable

AND UPON the Claimant confirming that this Order is not intended to prohibit lawful protest which does not endanger, slow, obstruct, or prevent the free flow of traffic onto or along the M25 motorway nor to prevent lawful use of the M25 by any person

IT IS ORDERED THAT:

1. For the purposes of this Order, the “M25” means the London Orbital Motorway including but not limited to the verges, central reservation, on- and off-slip roads, overbridges and underbridges including the Dartford Crossing and Queen Elizabeth II Bridge, and any apparatus related to that motorway.

Injunction in force

2. With immediate effect and until the earlier of (i) Trial; (ii) Further Order; or (iii) 23.59 pm on 21 March 2022, the Defendants and each of them are forbidden from:

- 2.1 Blocking, endangering, slowing down, preventing, or obstructing the free flow of traffic onto or along or off the M25 for the purposes of protesting.
 - 2.2 Causing damage to the surface of or to any apparatus on or around the M25 including but not limited to painting, damaging by fire, or affixing any item or structure thereto.
 - 2.3 Affixing themselves (“locking on”) to any other person or object on the M25.
 - 2.4 Erecting any structure on the M25.
 - 2.5 Tunnelling in the vicinity of the M25.
 - 2.6 Entering onto the M25 unless in a motor vehicle.
 - 2.7 Abandoning any vehicle or item on the M25 with the intention of causing an obstruction.
 - 2.8 Refusing to leave the area of the M25 when asked to do so by a police constable, National Highways Traffic Officer or High Court Enforcement Officer.
 - 2.9 Causing, assisting or encouraging any other person to do any act prohibited by paragraphs 2.1 – 2.8 above.
 - 2.10 Continuing any act prohibited by paragraphs 2.1 – 2.9 above.
3. The Claimant shall:
 - 3.1 Place copies of this Order and the Claim Form on the National Highways and Gov.uk website; and
 - 3.2 Send a copy of this Order and the Claim Form to Insulate Britain’s email address: Insulate Britain ring2021@protonmail.com.
 4. For the avoidance of doubt, compliance with paragraph 3 shall not constitute service.

Further directions

5. 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 immediately (and in any event not less than 48 hours before the hearing of any such application).

6. Any person applying to vary or discharge this order must provide their full name and address, an address for service, and must also apply to be joined as a named defendant to the proceedings at the same time.
7. The Claimant has liberty to apply to extend or vary this Order or for further directions.
8. The return date hearing to be listed for 10.30 am on 5 October 2021 in person.
9. Costs reserved.

Communications with the Claimant

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

FAO Antony Nwanodi
Government Legal Department,
102 Petty France, Westminster,
London SW1H 9GL
E: tony.nwanodi@governmentlegal.gov.uk
T: 020 7210 3424

BY THE COURT

Dated: 21 September 2021

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

Before: Mr Justice Cavanagh

On: 24 September 2021

B E T W E E N:

NATIONAL HIGHWAYS LIMITED

-and-

(1) PERSONS UNKNOWN CAUSING THE BLOCKING, SLOWING DOWN,
OBSTRUCTING OR OTHERWISE INTERFERING WITH THE FLOW OF
TRAFFIC ONTO OR OFF OR ALONG THE A2, A20 AND A2070 TRUNK
ROADS AND M2 AND M20 MOTORWAY FOR THE PURPOSE OF
PROTESTING



Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

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

UPON the Claimant’s claim in trespass and nuisance by Claim Form dated 24 September 2021 (“the Claim”)

AND UPON READING the Claim Form and the Witness Statement of Nicola Bell dated 24 September 2021

AND UPON hearing Michael Fry and Jonathan Welch, Counsel for the Claimant

AND UPON the Claimant indicating that it will provide to the Defendants copies of further evidence or other documents filed in these proceedings upon request, following the Defendants or their representatives providing contact details to the Claimant’s solicitors

AND UPON the Court accepting the Claimant’s undertaking that the Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss

AND UPON the Claimant undertaking to identify and name Defendants and apply to add them as named Defendants to this Order as soon as reasonably practicable

AND UPON the Claimant confirming that this Order is not intended to prohibit lawful protest which does not slow, obstruct, prevent or otherwise interfere with the flow of traffic onto off or along the A2, A20, A2070, M2 or M20 nor to prevent lawful use of the A2, A20, A2070, M2 or M20 by any person

IT IS ORDERED THAT:

1. For the purposes of this Order, the A2, A20, A2070, M2 and M20 (together the “Roads”) means the roads identified in the plans annexed to this Order including but not limited to the verges, central reservation, on- and off-slip roads, overbridges and underbridges and any apparatus related to that motorway.

Injunction in force

2. With immediate effect and until the earlier of (i) Trial; (ii) Further Order; or (iii) 23.59 pm on 24 March 2022, the Defendants and each of them are forbidden from:
 - 2.1 Blocking, slowing down, obstructing or otherwise interfering with the flow of traffic onto or along or off the Roads for the purpose of protesting.

- 2.2 Blocking, slowing down, obstructing or otherwise interfering with access to or from the Roads, and on any adjacent roads, slip roads or roundabouts which are not vested in the Claimant, for the purpose of protesting.
 - 2.3 Causing damage to the surface of or to any apparatus on or around the Roads including but not limited to painting, damaging by fire, or affixing any item or structure thereto.
 - 2.4 Affixing themselves (“locking on”) to any other person or object on the Roads.
 - 2.5 Erecting any structure on the Roads.
 - 2.6 Tunnelling in the vicinity of the Roads.
 - 2.7 Entering onto the Roads unless in a motor vehicle.
 - 2.8 Abandoning any vehicle or item on the Roads with the intention of causing an obstruction.
 - 2.9 Refusing to leave the area within 50m of the centre of the Roads when asked to do so by a police constable, National Highways Traffic Officer or High Court Enforcement Officer.
 - 2.10 Causing, assisting or encouraging any other person to do any act prohibited by paragraphs 2.1 – 2.9 above.
 - 2.11 Continuing any act prohibited by paragraphs 2.1 – 2.10 above.
3. The Claimant shall:
 - 3.1 Place copies of this Order and the Claim Form on the National Highways and Gov.uk website; and
 - 3.2 Send a copy of this Order and the Claim Form to Insulate Britain’s email address: Insulate Britain ring2021@protonmail.com.
 4. For the avoidance of doubt, compliance with paragraph 3 shall not constitute service.

Further directions

5. 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 immediately (and in any event not less than 48 hours before the hearing of any such application).
6. Any person applying to vary or discharge this order must provide their full name and address, an address for service, and must also apply to be joined as a named defendant to the proceedings at the same time.
7. The Claimant has liberty to apply to extend or vary this Order or for further directions.
8. The return date hearing to be listed for 10.30 am on 5 October 2021 in person.
9. Costs reserved.

Communications with the Claimant

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

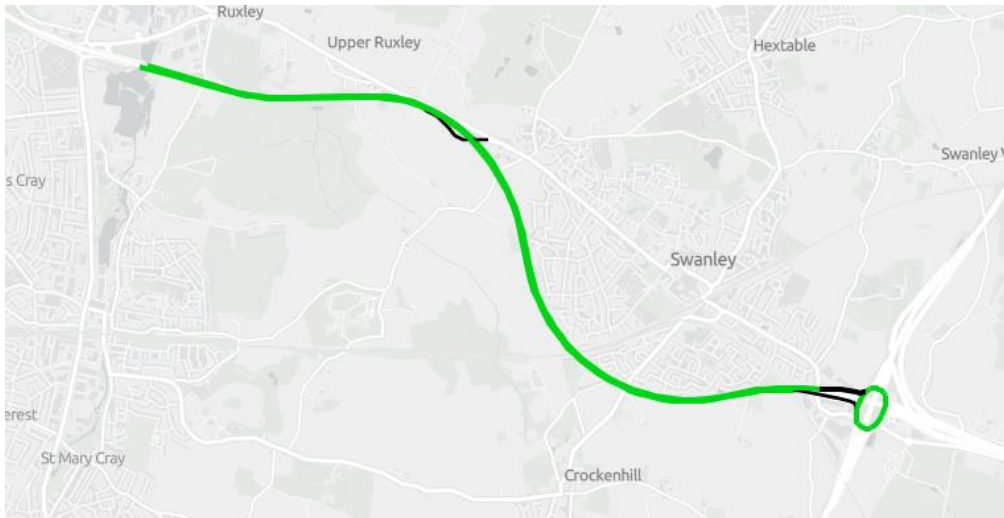
FAO Antony Nwanodi
Government Legal Department,
102 Petty France, Westminster,
London SW1H 9GL
E: tony.nwanodi@governmentlegal.gov.uk
T: 020 7210 3424

BY THE COURT

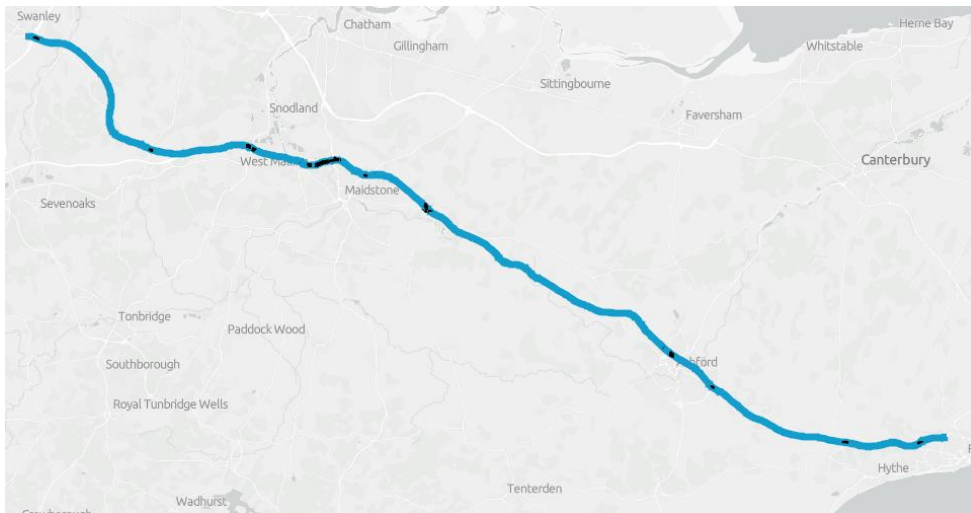
Dated: 24 September 2021

ANNEX TO THE ORDER OF MR JUSTICE CAVANAGH DATED 24 SEPTEMBER 2021

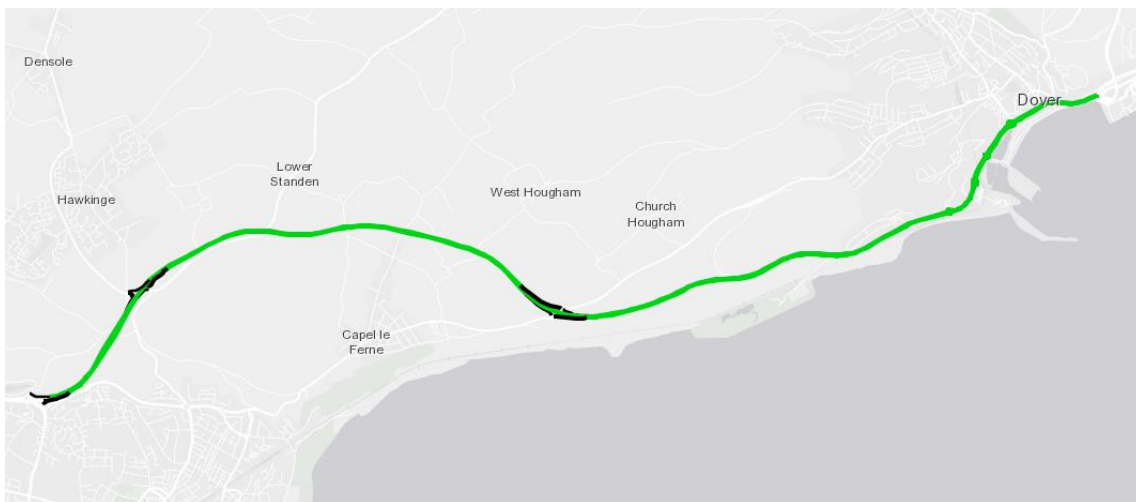
A20 London - M25



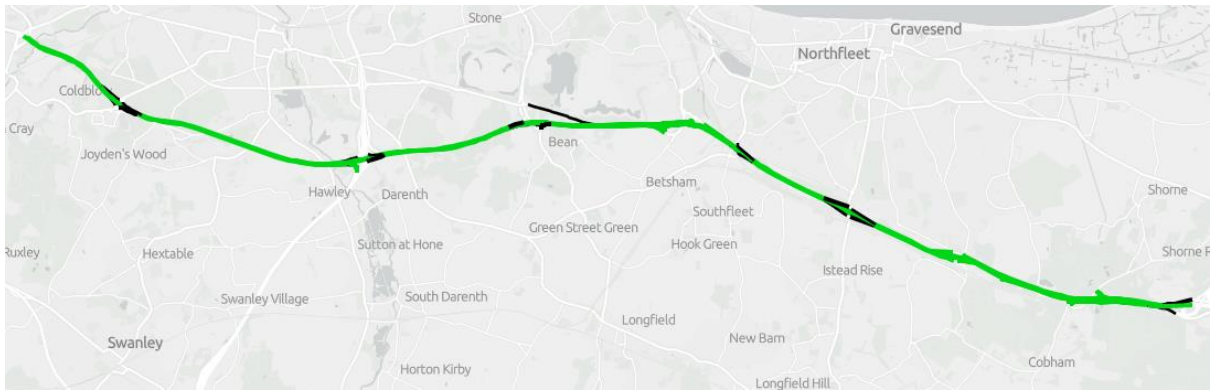
M20



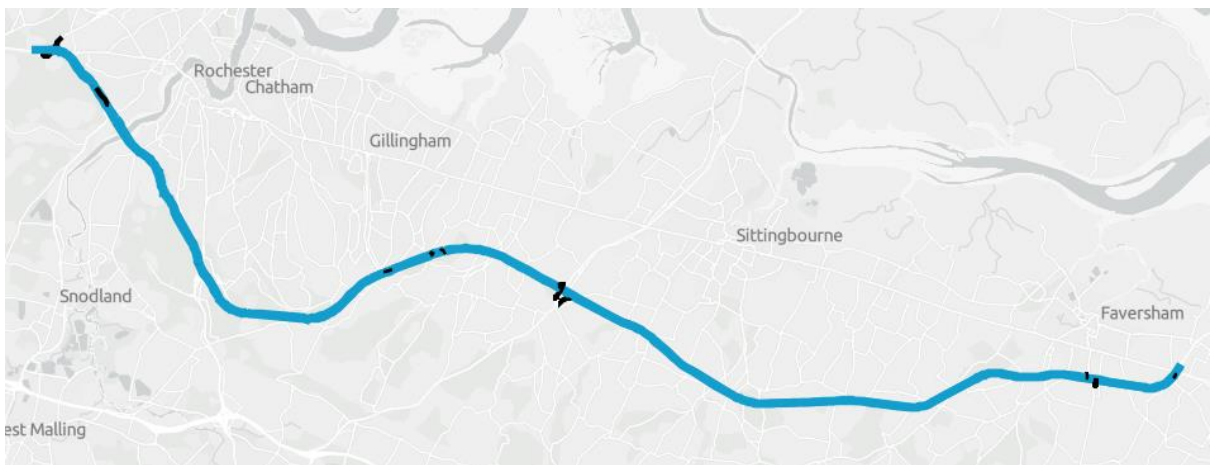
A20 Coast Section



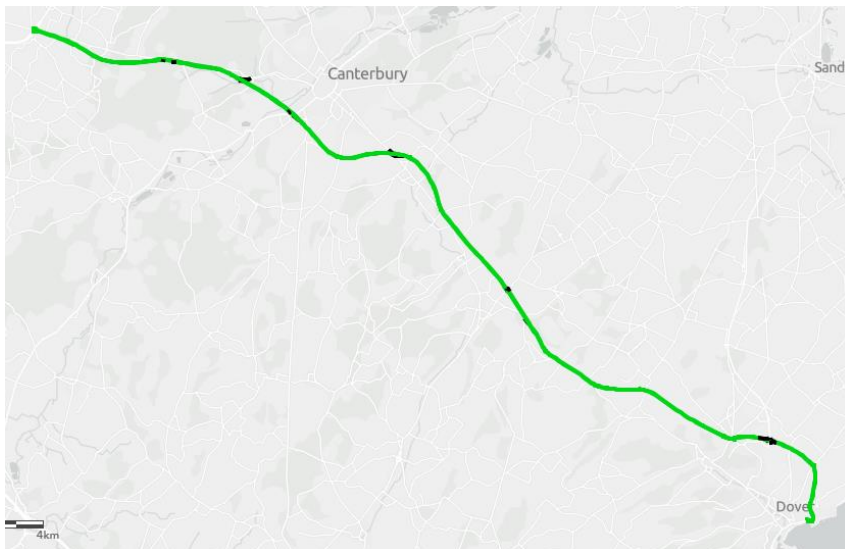
A2 London – M2 Section



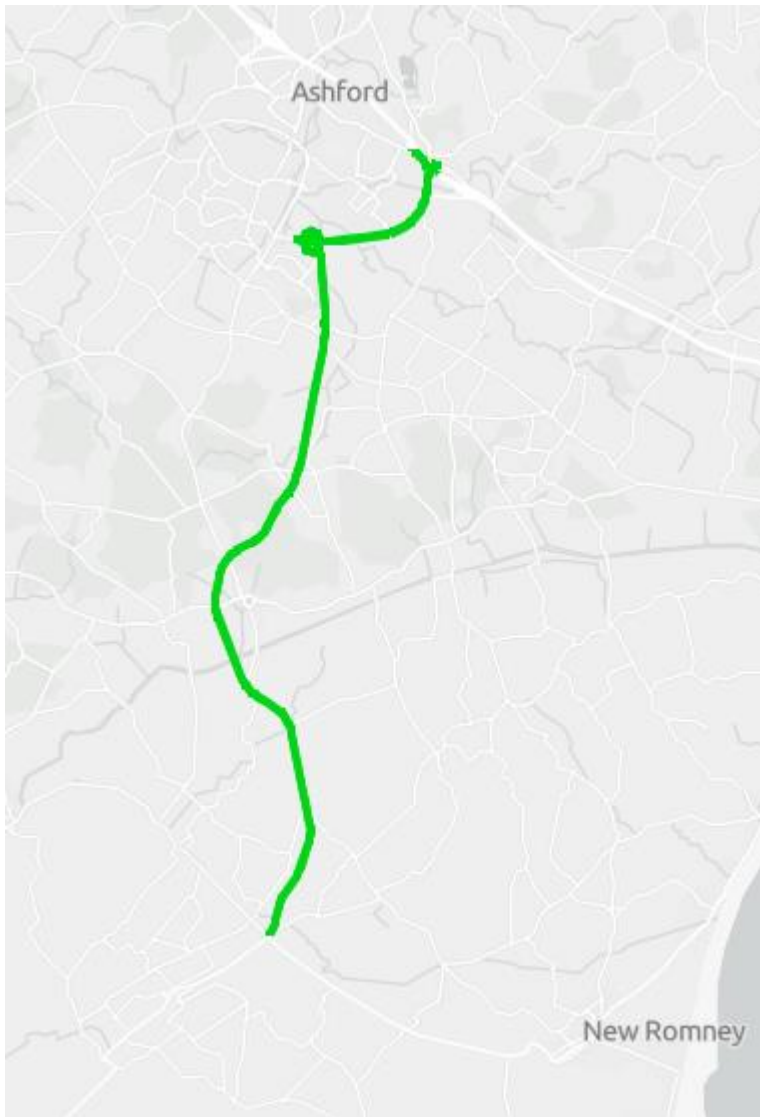
M2



A2 M2 - Dover Section



A2070



Kent & Surrounding areas SRN



IN THE HIGH COURT OF JUSTICE

QUEEN'S BENCH DIVISION

Mrs Justice May

B E T W E E N

NATIONAL HIGHWAYS LIMITED

-and-



PERSONS UNKNOWN CAUSING THE BLOCKING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE INTERFERING WITH THE FLOW OF TRAFFIC ONTO OR OFF OR ALONG THE A2, A20 AND A2070 TRUNK ROADS AND M2 AND M20 MOTORWAY FOR THE PURPOSE OF PROTESTING

Defendant

ORDER

UPON hearing counsel for the Claimant

AND UPON reading the witness statement of Antony Nwanodi on behalf of the Claimant

AND UPON the Claimant making the application for disclosure at the request of the police

AND UPON the Claimant's evidence of the attempts that have been made to effect personal service on the Defendants and the list of those now identified and served.

IT IS ORDERED THAT:-

1. The Defendants whose names appear in the list annexed to this Order shall be joined as named Defendants to these proceedings.

Disclosure

2. The Chief Constables listed in Schedule 1 to this order shall disclose to the Claimant the name and address of any person who has been arrested by one of their officers in the course of, or as a result of, protests on the highway referred to in these proceedings.

3. The disclosure of information required by paragraph 2 of this order shall be made by 4pm on 4 October 2021.
4. The Chief Constables listed in Schedule 1 to this Order shall disclose to the Claimant all arrest notes, body cam footage and/or other photographic material relating to possible breaches of the Court Order of 24th September.

Service

5. The Claimant is permitted in addition to personal service to serve the Order of 24th September and the claim form and other documents in these proceedings by all of the following methods together:
 - a. service by email on Insulate Britain; and
 - b. posting a copy of the Order of 24th September 2021 together with a copy of the claim form and evidence in support through the letterbox of each Defendant at the address given by the Police (or leaving in a separate mailbox) with a notice affixed to the front door if necessary, drawing the recipient's attention to the fact the package contains a court order. If the premises do not have a letterbox, or mailbox, a package containing the Court orders and the proceedings may be affixed to the front door 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 Schedule 2]

Costs

6. No order for costs.
7. Permission to apply to vary or discharge this Order on 24 hours' written notice to the Claimant.

Signed:

Dated: 1 October 2021

IN THE HIGH COURT OF JUSTICE

QUEEN’S BENCH DIVISION

B E T W E E N

NATIONAL HIGHWAYS LIMITED

Claimant

-and-

**PERSONS UNKNOWN CAUSING THE BLOCKING, SLOWING DOWN,
OBSTRUCTING OR OTHERWISE INTERFERING WITH THE FLOW OF
TRAFFIC ONTO OR OFF OR ALONG THE A2, A20 AND A2070 TRUNK ROADS
AND M2 AND M20 MOTORWAY FOR THE PURPOSE OF PROTESTING**

Defendants

ANNEXE TO ORDER – NAMED DEFENDANTS

	Name	Address	Surrey Police	Essex Police	Met Police	Hertfords hire Police	Kent Police	Tham es Valle y Police
1	Alexander RODGER	[REDACTED]						
2	Alyson LEE	[REDACTED]						
3	Amy Pritchard	[REDACTED]						

4	Ana Heyatawin	[REDACTED]						
5	Andrew Worsley	[REDACTED]						
6	Anne Taylor	[REDACTED]						
7	Anthony WHITEHO USE	[REDACTED]						
8	Arne Springorum	[REDACTED]						
9	Barry Mitchell	[REDACTED]						
10	Barry Mitchell	[REDACTED]						
11	Ben TAYLOR	[REDACTED]						
12	Benjamin Buse	[REDACTED]						
13	Biff William	[REDACTED]						

	Courtenay Whipster	██████████ ██████████						
14	Cameron FORD	██████████ ██████████ ██████████ ██████████						
15	Catherine RENNIE-NASH	██████████ ██████████ ██████████						
16	Cathy Eastburn	██████████ ██████████ ██████████ ██████████						
17	Christian Murray-Leslie	██████████ ██████████ ██████████ ██████████						
18	Christian Rowe	██████████ ██████████ ██████████ ██████████						
19	Cordelia Rowlatt	██████████ ██████████ ██████████ ██████████ ██████████ ██████████						
20	Daniel Sargison	██████████ ██████████						
21	Daniel Shaw	██████████ ██████████ ██████████ ██████████ ██████████						
22	David CRAWFORD	██████████ ██████████ ██████████						
23	David JONES	██████████ ██████████ ██████████ ██████████						

24	David Nixon	██████████ ██████████ ██████████ ██████████						
25	David Squire	██████████ ██████████ ██████████ ██████████						
26	Diana Bligh	██████████ ██████████ ██████████ ██████████ ██████████ ██████████						
27	Diana Hekt	██████████ ██████████ ██████████ ██████████ ██████████						
28	Diana Lewen Warner	██████████ ██████████ ██████████ ██████████ ██████████						
29	Donald BELL	██████████ ██████████ ██████████						
30	Edward HERBERT	██████████ ██████████ ██████████ ██████████ ██████████						
31	Elizabeth Rosser	██████████ ██████████ ██████████ ██████████ ██████████ ██████████						
32	Emily Brocklebank	██████████ ██████████ ██████████ ██████████ ██████████						
33	Emma Joanne Smart	██████████ ██████████ ██████████						

34	Gabriella Ditton	██████████ ██████████████████ ██████████████ ██████████████████ ██████████████						
35	Gregory FREY	██████████ ██████████						
36	Gwen HARRISO N	██████████████ ██████████████████ ██████████						
37	Harry Barlow	██████████████ ██████████ ██████████████ ██████████████ ██████████						
38	Ian Bates	██████████████ ██████████████ ██████████ ██████████████████ ██████████						
39	Ian Duncan Webb	██████████████ ██████████ ██████████████ ██████████						
40	James Bradbury	██████████████ ██████████ ██████████████████ ██████████████ ██████████						
41	James Sargison	██████████ ██████████						
42	James Thomas	██████████ ██████████████ ██████████ ██████████████████ ██████████████ ██████████						
43	Janet Brown	██████████████ ██████████████████ ██████████ ██████████████████ ██████████						

		██████████ ██████████						
44	Janine EAGLING	██████████ ██████████ ██████████						
45	Jerrard Mark Latimer	██████████ ██████████ ██████████ ██████████						
46	Jessica Causby	██████████ ██████████ ██████████ ██████████ ██████████						
47	Jonathan Coleman	██████████ ██████████ ██████████ ██████████						
48	Joseph SHEPHER D	██████████ ██████████ ██████████ ██████████						
49	Joshua Smith	██████████ ██████████ ██████████ ██████████ ██████████						
50	Judith Bruce	██████████ ██████████ ██████████ ██████████ ██████████						
51	Julia Mercer	██████████ ██████████ ██████████ ██████████						
52	Julia Schofield	██████████ ██████████ ██████████ ██████████						
53	Karen Matthews	██████████ ██████████ ██████████ ██████████ ██████████						

54	Karen Wildin	[REDACTED]						
55	Liam Norton	[REDACTED]						
56	Louis McKechnie	[REDACTED]						
57	Louise Charlotte Lancaster	[REDACTED]						
58	Lucy Crawford	[REDACTED]						
59	Mair Bain	[REDACTED]						
60	Margaret MALOWS KA	[REDACTED]						
61	Marguerite Dowbleday	[REDACTED]						
62	Maria Lee	[REDACTED]						
63	Martin NEWELL	[REDACTED]						

		██████████ ██████████						
64	Mary Adams	██████████ ██████████ ██████████████████ ██████████ ██████████ ██████████████ ██████████						
65	Martin Lunnon	██████████████ ██████████████ ██████████████ ██████████						
66	Matthew Tulley	██████████████ ██████████████ ██████████████ ██████████████ ██████████						
67	Meredith Williams	██████████████ ██████████████ ██████████████ ██████████						
68	Michael Brown	██████████████ ██████████ ██████████████ ██████████████ ██████████						
69	Michael WILEY	██████████████ ██████████████ ██████████ ██████████████ ██████████████ ██████████						
70	Michelle Charlesworth	██████████████ ██████████ ██████████ ██████████████ ██████████						
71	Natalie MORLEY	██████████████ ██████████ ██████████████ ██████████████						

72	Nathaniel Squire	[REDACTED]						
73	Nicholas Cooper	[REDACTED]						
74	Nicholas ONLEY	[REDACTED]						
75	Nicholas TILL	[REDACTED]						
76	Oliver Rock	[REDACTED]						
77	Paul Cooper	[REDACTED]						
78	Paul Sheeky	[REDACTED]						
79	Peter BLENCOW E	[REDACTED]						
80	Peter Morgan	[REDACTED]						
81	Phillipa CLARKE	[REDACTED]						

		██████████ ██████████						
82	Priyadaka CONWAY	██████████ ██████████ ██████████ ██████████ ██████████						
83	Richard RAMSDEN	██████████ ██████████ ██████████ ██████████						
84	Rob STUART	██████████ ██████████ ██████████ ██████████						
85	Robin COLLETT	██████████ ██████████ ██████████ ██████████						
86	Roman Andrzej Paluch- Machnik	██████████ ██████████ ██████████ ██████████ ██████████						
87	Rosemary Webster	██████████ ██████████ ██████████ ██████████ ██████████						
88	Rowan Tilly	██████████ ██████████ ██████████ ██████████ ██████████						
89	Ruth Ann Cook	██████████ ██████████ ██████████ ██████████ ██████████						
90	Ruth Jarman	██████████ ██████████ ██████████ ██████████ ██████████ ██████████						

91	Sarah Hirons	[REDACTED]						
92	Serena Schellenberg	[REDACTED]						
93	Simon REDING	[REDACTED]						
94	Stefania MOROSI	[REDACTED]						
95	Stephanie AYLETT	[REDACTED]						
96	Stephen Gower	[REDACTED]						
97	Stephen Pritchard	[REDACTED]						
98	Sue Chambers	[REDACTED]						
99	Sue Parfitt	[REDACTED]						

100	Sue Spencer-Longhurst	[REDACTED]						
101	Susan HAGLEY	[REDACTED]						
102	Suzie WEBB	[REDACTED]						
103	Tam Millar	[REDACTED]						
104	Tessa-Marie Burns	[REDACTED]						
105	Teresa NORTON	[REDACTED]						
106	Tim Speers	[REDACTED]						
107	Tim William Hewes	[REDACTED]						
108	Tracey Mallaghan	[REDACTED]						
109	Tryrone Hodge	[REDACTED]						

11 0	Valeria SAUNDER S	██████████ ██████████ ██████████ ██████████ ██████████						
11 1	Venitia CARTER	███ ██████████ ██████████ ██████████ ██████████ ██████████						
11 2	Victoria Anne Lindsell	██████████ ██████████ ██████████ ██████████						
11 3	Xabier GONZALE Z TRIMMER	██████████ ██████████ ██████████						

Schedule 1

Those not opposing this order include:

1. The Chief Constable of Kent Police.

Schedule 2

[On the package containing the Court order and proceedings]

“VERY URGENT: THIS PACKAGE CONTAIN AN ORDER OF THE HIGH COURT AND YOU SHOULD READ IT IMMEDIATELY AND SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE CALL [XXXXXX]”

[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 CALL [XXXXXX]”

IN THE HIGH COURT OF JUSTICE

QUEEN'S BENCH DIVISION

Mrs Justice May

B E T W E E N

NATIONAL HIGHWAYS LIMITED

-and-



**PERSONS UNKNOWN CAUSING THE BLOCKING, ENDANGERING, SLOWING
DOWN, OBSTRUCTING OR OTHERWISE PREVENTING THE FREE FLOW OF
TRAFFIC ONTO OR ALONG THE M25 MOTORWAY FOR THE PURPOSE OF
PROTESTING**

ORDER

UPON hearing counsel for the Claimant

AND UPON reading the witness statement of Antony Nwanodi on behalf of the Claimant

AND UPON the Claimant making the application for disclosure at the request of the police

AND UPON the Claimant's evidence of the attempts that have been made to effect personal service on the Defendants and the list of those now identified and served.

IT IS ORDERED THAT:-

1. The Defendants whose names appear in the list annexed to this Order shall be joined as named Defendants to these proceedings.

Disclosure

2. The Chief Constables listed in Schedule 1 to this order shall disclose to the Claimant the name and address of any person who has been arrested by one of their officers in the course of, or as a result of, protests on the highway referred to in these proceedings.

3. The disclosure of information required by paragraph 2 of this order shall be made by 4pm on 4 October 2021.
4. The Chief Constables listed in Schedule 1 to this Order shall disclose to the Claimant all arrest notes, body cam footage and/or other photographic material relating to possible breaches of the Court Order of 21st September.

Service

5. The Claimant is permitted in addition to personal service to serve the Order of 21st September and the claim form and other documents in these proceedings by all of the following methods together:
 - a. service by email on Insulate Britain; and
 - b. posting a copy of the Order of 24th September 2021 together with a copy of the claim form and evidence in support through the letterbox of each Defendant at the address given by the Police (or leaving in a separate mailbox) with a notice affixed to the front door if necessary, drawing the recipient's attention to the fact the package contains a court order. If the premises do not have a letterbox, or mailbox, a package containing the Court orders and the proceedings may be affixed to the front door 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 Schedule 2]
6. No order for costs.
7. Permission to apply to vary or discharge this Order on 24 hours' written notice to the Claimant.

Signed:

Dated: 1 October 2021

IN THE HIGH COURT OF JUSTICE

QUEEN’S BENCH DIVISION

B E T W E E N

NATIONAL HIGHWAYS LIMITED

Claimant

-and-

PERSONS UNKNOWN CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE PREVENTING THE FREE FLOW OF TRAFFIC ONTO OR ALONG THE M25 MOTORWAY FOR THE PURPOSE OF PROTESTING

ANNEXE TO ORDER – NAMED DEFENDANTS

	Name	Address	Surrey Police	Essex Police	Met Police	Hertfords hire Police	Kent Police	Thames Valley Police
1	Alexander RODGER	[REDACTED]						
2	Alyson LEE	[REDACTED]						
3	Amy Pritchard	[REDACTED]						
4	Ana Heyatawin	[REDACTED]						

5	Andrew Worsley	[REDACTED]	
6	Anne Taylor	[REDACTED]	
7	Anthony WHITEHO USE	[REDACTED]	
8	Arne Springorum	[REDACTED]	
9	Barry Mitchell	[REDACTED]	
10	Barry Mitchell	[REDACTED]	
11	Ben TAYLOR	[REDACTED]	
12	Benjamin Buse	[REDACTED]	
13	Biff William Courtenay Whipster	[REDACTED]	
14	Cameron FORD	[REDACTED]	

15	Catherine RENNIE- NASH	[REDACTED]	
16	Cathy Eastburn	[REDACTED]	
17	Christian Murray- Leslie	[REDACTED]	
18	Christian Rowe	[REDACTED]	
19	Cordelia Rowlatt	[REDACTED]	
20	Daniel Sargison	[REDACTED]	
21	Daniel Shaw	[REDACTED]	
22	David CRAWFOR D	[REDACTED]	
23	David JONES	[REDACTED]	
24	David Nixon	[REDACTED]	
25	David Squire	[REDACTED]	

		██████████ ██████████	
26	Diana Bligh	██████████ ██████████ ██████████ ██████████ ██████████ ██████████ ██████████	
27	Diana Hekt	██████████ ██████████ ██████████ ██████████ ██████████	
28	Diana Lewen Warner	██████████ ██████████ ██████████ ██████████ ██████████	
29	Donald BELL	██████████ ██████████ ██████████	
30	Edward HERBERT	██████████ ██████████ ██████████ ██████████ ██████████	
31	Elizabeth Rosser	██████████ ██████████ ██████████ ██████████ ██████████ ██████████	
32	Emily Brockleban k	██████████ ██████████ ██████████ ██████████ ██████████	
33	Emma Joanne Smart	██████████ ██████████ ██████████	
34	Gabriella Ditton	██████████ ██████████ ██████████ ██████████	

		██████████ ██████████	
35	Gregory FREY	██████████ ██████████	
36	Gwen HARRISON	██████████ ██████████ ██████████	
37	Harry Barlow	██████████ ██████████ ██████████ ██████████	
38	Ian Bates	██████████ ██████████ ██████████ ██████████	
39	Ian Duncan Webb	██████████ ██████████ ██████████	
40	James Bradbury	██████████ ██████████ ██████████ ██████████	
41	James Sargison	██████████ ██████████	
42	James Thomas	██████████ ██████████ ██████████ ██████████	
43	Janet Brown	██████████ ██████████ ██████████ ██████████ ██████████	
44	Janine EAGLING	██████████ ██████████ ██████████	

45	Jerrard Mark Latimer	[REDACTED]
46	Jessica Causby	[REDACTED]
47	Jonathan Coleman	[REDACTED]
48	Joseph SHEPHER D	[REDACTED]
49	Joshua Smith	[REDACTED]
50	Judith Bruce	[REDACTED]
51	Julia Mercer	[REDACTED]
52	Julia Schofield	[REDACTED]
53	Karen Matthews	[REDACTED]
54	Karen Wildin	[REDACTED]

55	Liam Norton	[REDACTED]	
56	Louis McKechnie	[REDACTED]	
57	Louise Charlotte Lancaster	[REDACTED]	
58	Lucy Crawford	[REDACTED]	
59	Mair Bain	[REDACTED]	
60	Margaret MALOWS KA	[REDACTED]	
61	Marguerite Dowbleday	[REDACTED]	
62	Maria Lee	[REDACTED]	
63	Martin NEWELL	[REDACTED]	




64	Mary Adams	<p>██████████ ██████████</p> <p>██████████████████ ██████████</p> <p>██████████ ██████████████ ██████████</p>	
65	Martin Lunnon	<p>██████████████ ██████████████ ██████████ ██████████████ ██████████</p>	
66	Matthew Tulley	<p>██████████████ ██████████████ ██████████████ ██████████████ ██████████</p>	
67	Meredith Williams	<p>██████████████ ██████████████ ██████████ ██████████</p>	
68	Michael Brown	<p>██████████████ ██████████ ██████████████ ██████████ ██████████████ ██████████</p>	
69	Michael WILEY	<p>██████████████ ██████████████ ██████████ ██████████████ ██████████████ ██████████</p>	
70	Michelle Charlesworth	<p>██████████████ ██████████</p> <p>██████████</p> <p>██████████████ ██████████████</p>	
71	Natalie MORLEY	<p>██████████████ ██████████ ██████████████ ██████████████ ██████████████</p>	
72	Nathaniel Squire	<p>██████████████ ██████████████ ██████████ ██████████████ ██████████</p>	

73	Nicholas Cooper	[REDACTED]	
74	Nicholas ONLEY	[REDACTED]	
75	Nicholas TILL	[REDACTED]	
76	Oliver Rock	[REDACTED]	
77	Paul Cooper	[REDACTED]	
78	Paul Sheeky	[REDACTED]	
79	Peter BLENCOW E	[REDACTED]	
80	Peter Morgan	[REDACTED]	
81	Phillipa CLARKE	[REDACTED]	
82	Priyadaka CONWAY	[REDACTED]	

83	Richard RAMSDEN	██████████ ██████████ ██████████ ██████████	
84	Rob STUART	██████████ ██████████ ██████████ ██████████	
85	Robin COLLETT	██████████ ██████████ ██████████ ██████████	
86	Roman Andrzej Paluch- Machnik	██████████ ██████████ ██████████ ██████████ ██████████	
87	Rosemary Webster	██████████ ██████████ ██████████ ██████████ ██████████	
88	Rowan Tilly	██████████ ██████████ ██████████ ██████████ ██████████	
89	Ruth Ann Cook	██████████ ██████████ ██████████ ██████████ ██████████	
90	Ruth Jarman	██████████ ██████████ ██████████ ██████████ ██████████ ██████████	
91	Sarah Hirons	██████████ ██████████ ██████████ ██████████ ██████████	
92	Serena Schellenber g	██████████ ██████████ ██████████ ██████████	

		██████████ X ██████████	
93	Simon REDING	██████████ ██████████ ██████████ ██████████ ██████████	
94	Stefania MOROSI	██████████ ██████████ ██████████ ██████████ ██████████	
95	Stephanie AYLETT	██████████ ██████████ ██████████ ██████████	
96	Stephen Gower	██████████ ██████████ ██████████ ██████████ ██████████	
97	Stephen Pritchard	██████████ ██████████ ██████████ ██████████ ██████████	
98	Sue Chambers	██████████ ██████████ ██████████ ██████████ ██████████	
99	Sue Parfitt	██████████ ██████████ ██████████ ██████████ ██████████ ██████████	
10 0	Sue Spencer- Longhurst	██████████ ██████████ ██████████	
10 1	Susan HAGLEY	██████████ ██████████ ██████████ ██████████ ██████████	

10 2	Suzie WEBB	[REDACTED]	
10 3	Tam Millar	[REDACTED]	
10 4	Tessa-Marie Burns	[REDACTED]	
10 5	Teresa NORTON	[REDACTED]	
10 6	Tim Speers	[REDACTED]	
10 7	Tim William Hewes	[REDACTED]	
10 8	Tracey Mallaghan	[REDACTED]	
10 9	Tryrone Hodge	[REDACTED]	
11 0	Valeria SAUNDER S	[REDACTED]	

11 1	Venitia CARTER								
11 2	Victoria Anne Lindsell								
11 3	Xabier GONZALE Z TRIMMER								

Schedule 1

Those not opposing this order include:

1. The Commissioner of Police of the Metropolis
of New Scotland Yard, Victoria Embankment, SW1A 2JL
2. The Chief Constables of Hertfordshire, Essex,
Kent, Surrey, Thames Valley

Schedule 2

[On the package containing the Court order and proceedings]

“VERY URGENT: THIS PACKAGE CONTAIN AN ORDER OF THE HIGH COURT AND YOU SHOULD READ IT IMMEDIATELY AND SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE CALL [XXXXXX]”

[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 CALL [XXXXXX]”

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

Before: The Honourable Mr Justice Holgate

B E T W E E N:

NATIONAL HIGHWAYS LIMITED

Claimant

-and-

(1) PERSONS UNKNOWN CAUSING THE BLOCKING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE INTERFERING WITH THE FLOW OF TRAFFIC ONTO OR OFF OR ALONG THE 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) MR ALEXANDER RODGER AND 112 OTHERS

Defendants



ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

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

UPON HEARING the Claimant's out of hours application in trespass and nuisance by Claim Form dated 1 October 2021 ("the Claim")

AND UPON READING the Claim Form and the Witness Statements of Nicola Bell

dated 1 October 2021 and the statements of Dhiresh Bhatt and Robert Bell dated 2 October 2021

AND UPON the Claimant undertaking to file the claim and application, and the note of this hearing, and pay the relevant court fees within 24 hours of the sealing of this Order

AND UPON hearing Leading Counsel for the Claimant

AND UPON the Claimant undertaking that it will provide to the Defendants copies of further evidence or other documents filed in these proceedings upon request, including the Claimant's note of this hearing, following the Defendants or their representatives providing contact details to the Claimant's solicitors

AND UPON the Court accepting the Claimant's undertaking that the Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss

AND UPON the Claimant undertaking to identify and name Defendants and apply to add them as named Defendants to this Order as soon as reasonably practicable

AND UPON the Claimant confirming that this Order is not intended to prohibit lawful protest which does not slow, obstruct, prevent or otherwise interfere with the flow of traffic onto off or along the A1(M) (Junction 1 to Junction 6), M11 (Junction 4 to Junction 7), A12 (M25 Junction 28 to A12 Junction 12), A13 (M25 Junction 30 to A1089), 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), 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) and A414 (M1 Junction 8 to A405).

IT IS ORDERED THAT:

1. The “within named Defendants” are those Defendants whose names appear in the schedule annexed to this Order (Annex 1). The term “Defendants” refers to both “persons unknown” and the within named Defendants.
2. For the purposes of this Order, the A1(M) (Junction 1 to Junction 6), M11 (Junction 4 to Junction 7), A12 (M25 Junction 28 to A12 Junction 12), A13 (M25 Junction 30 to A1089), 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), 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) and A414 (M1 Junction 8 to A405) (together “the Roads”) means the Roads identified by the descriptions and plan annexed to this Order (Annex 2) including but not limited to the verges, central reservation, on- and off-slip roads, overbridges and underbridges, including any roundabouts for access to and from the Roads, and any apparatus related to those Roads.
3. The Claimant has permission to amend the claim form and the notice of application to more accurately describe the Roads.

Injunction in force

4. With immediate effect and until the earlier of (i) Trial; (ii) Further Order; or (iii) 23.59 pm on 24 March 2022, the Defendants and each of them are forbidden from:
 - 4.1 Blocking, slowing down, obstructing or otherwise interfering with the flow of traffic onto or along or off the Roads for the purpose of protesting.
 - 4.2 Blocking, slowing down, obstructing or otherwise interfering with access to or from the Roads, and on any adjacent roads, slip roads or roundabouts which are not vested in the Claimant, for the purpose of protesting.

- 4.3 Causing damage to the surface of or to any apparatus on or around the Roads including but not limited to painting, damaging by fire, or affixing any item or structure thereto.
 - 4.4 Affixing themselves (“locking on”) to any other person or object on the Roads.
 - 4.5 Erecting any structure on the Roads.
 - 4.6 Tunnelling in the vicinity of the Roads.
 - 4.7 Entering onto the Roads unless in a motor vehicle.
 - 4.8 Abandoning any vehicle or item on the Roads with the intention of causing an obstruction.
 - 4.9 Refusing to leave the area within 50m of the centre of the Roads when asked to do so by a police constable, National Highways Traffic Officer or High Court Enforcement Officer.
 - 4.10 Causing, assisting or encouraging any other person to do any act prohibited by paragraphs 4.1 – 4.9 above.
 - 4.11 Continuing any act prohibited by paragraphs 4.1 – 4.10 above.
5. The Claimant shall:
 - 5.1 Place copies of this Order and the Claim Form on the National Highways and Gov.uk website; and
 - 5.2 Send a copy of this Order and the Claim Form to Insulate Britain’s email address: Insulate Britain ring2021@protonmail.com.
 6. For the avoidance of doubt, compliance with paragraph 5 shall not constitute service.

Alternative Service

7. The Claimant is permitted in addition to personal service to serve this Order and the claim form and other documents in these proceedings both of the following methods together:
 - 7.1 Service of the sealed Order on Insulate Britain by email; and
 - 7.2 posting a copy of this Order together with a copy of the claim form and evidence in support through the letterbox of each Defendant (or leaving in a separate mailbox) with a notice affixed to the front door if necessary, drawing the recipient's attention to the fact the package contains a court order. If the premises do not have a letterbox, or mailbox, a package containing this Order and the proceedings may be affixed to the front door 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 Schedule 1.

Further directions

8. 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 immediately (and in any event not less than 48 hours before the hearing of any such application).
9. Any person applying to vary or discharge this Order must provide their full name and address, an address for service, and must also apply to be joined as a named defendant to the proceedings at the same time.
10. The Claimant has permission to apply to extend or vary this Order or for further directions.
11. The return date hearing to be listed for 10.30 am on 12 October 2021 in person. Time estimate 2-3 hours. Any party disagreeing with the time estimate should notify the Court as soon as possible.

12. Any Defendant who proposes to attend and oppose the order on the return date shall file a skeleton argument and any evidence to be relied upon by no later than 10 am on 11 October 2021.

13. Costs reserved.

Communications with the Claimant

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

FAO Antony Nwanodi
Government Legal Department,
102 Petty France, Westminster,
London SW1H 9GL
E: tony.nwanodi@governmentlegal.gov.uk
T: 020 7210 3424

BY THE COURT

Sir David

Holgate

Dated: 2 October 2021

IN THE HIGH COURT OF JUSTICE

QUEEN'S BENCH DIVISION

B E T W E E N

NATIONAL HIGHWAYS LIMITED

Claimant

-and-

(1) PERSONS UNKNOWN CAUSING THE BLOCKING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE INTERFERING WITH THE FLOW OF TRAFFIC ONTO OR OFF OR ALONG THE 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) MR ALEXANDER RODGER AND 112 OTHERS

Defendants

ANNEXE 1 TO ORDER – NAMED DEFENDANTS

	Name	Address	Surrey Police	Essex Police	Met Police	Hertfordshire Police	Kent Police	Thames Valley Police
1								
2								
3								

4	Ana Heyata win	
5	Andrew Worsley	
6	Anne Taylor	
7	Anthony WHITE HOUSE	
8	Arne Springorum	
9	Barry Mitchell	
10	Barry Mitchell	
11	Ben TAYLOR	
12	Benjamin Buse	

13	Biff William Courten ay Whipst er	
14	Camero n FORD	
15	Catheri ne RENNI E- NASH	
16	Cathy Eastbur n	
17	Christia n Murray- Leslie	
18	Christia n Rowe	
19	Cordeli a Rowlatt	
20	Daniel Sargiso n	
21	Daniel Shaw	
22	David CRAW FORD	

23	David JONES	
24	David Nixon	
25	David Squire	
26	Diana Bligh	
27	Diana Hekt	
28	Diana Lewen Warner	
29	Donald BELL	
30	Edward HERBE RT	
31	Elizabet h Rosser	

32	Emily Brocklebank	
33	Emma Joanne Smart	
34	Gabriella Ditton	
35	Gregory FREY	
36	Gwen HARRISON	
37	Harry Barlow	
38	Ian Bates	
39	Ian Duncan Webb	
40	James Bradbury	
41	James Sargison	
42	James Thomas	

43	Janet Brown	
44	Janine EAGLING	
45	Jerrard Mark Latimer	
46	Jessica Causby	
47	Jonathan Coleman	
48	Joseph SHEPHERD	
49	Joshua Smith	
50	Judith Bruce	
51	Julia Mercer	
52	Julia Schofield	

53	Karen Matthe ws	
54	Karen Wildin	
55	Liam Norton	
56	Louis McKec hnie	
57	Louise Charlott e Lancast er	
58	Lucy Crawfor d	
59	Mair Bain	
60	Margar et MALO WSKA	
61	Margue rite Dowble day	
62	Maria Lee	

63	Martin NEWEL L	
64	Mary Adams	
65	Martin Lunnon	
66	Matthe w Tulley	
67	Meredi h William s	
68	Michael Brown	
69	Michael WILEY	
70	Michell e Charles worth	

71	Natalie MORLE Y	
72	Nathani el Squire	
73	Nichola s Cooper	
74	Nichola s ONLEY	
75	Nichola s TILL	
76	Oliver Rock	
77	Paul Cooper	
78	Paul Sheeky	
79	Peter BLENC OWE	

80	Peter Morgan	
81	Phillipa CLARK E	
82	Priyada ka CONW AY	
83	Richard RAMS DEN	
84	Rob STUAR T	
85	Robin COLLE TT	
86	Roman Andrzej Paluch- Machni k	
87	Rosem ary Webste r	
88	Rowan Tilly	
89	Ruth Ann Cook	

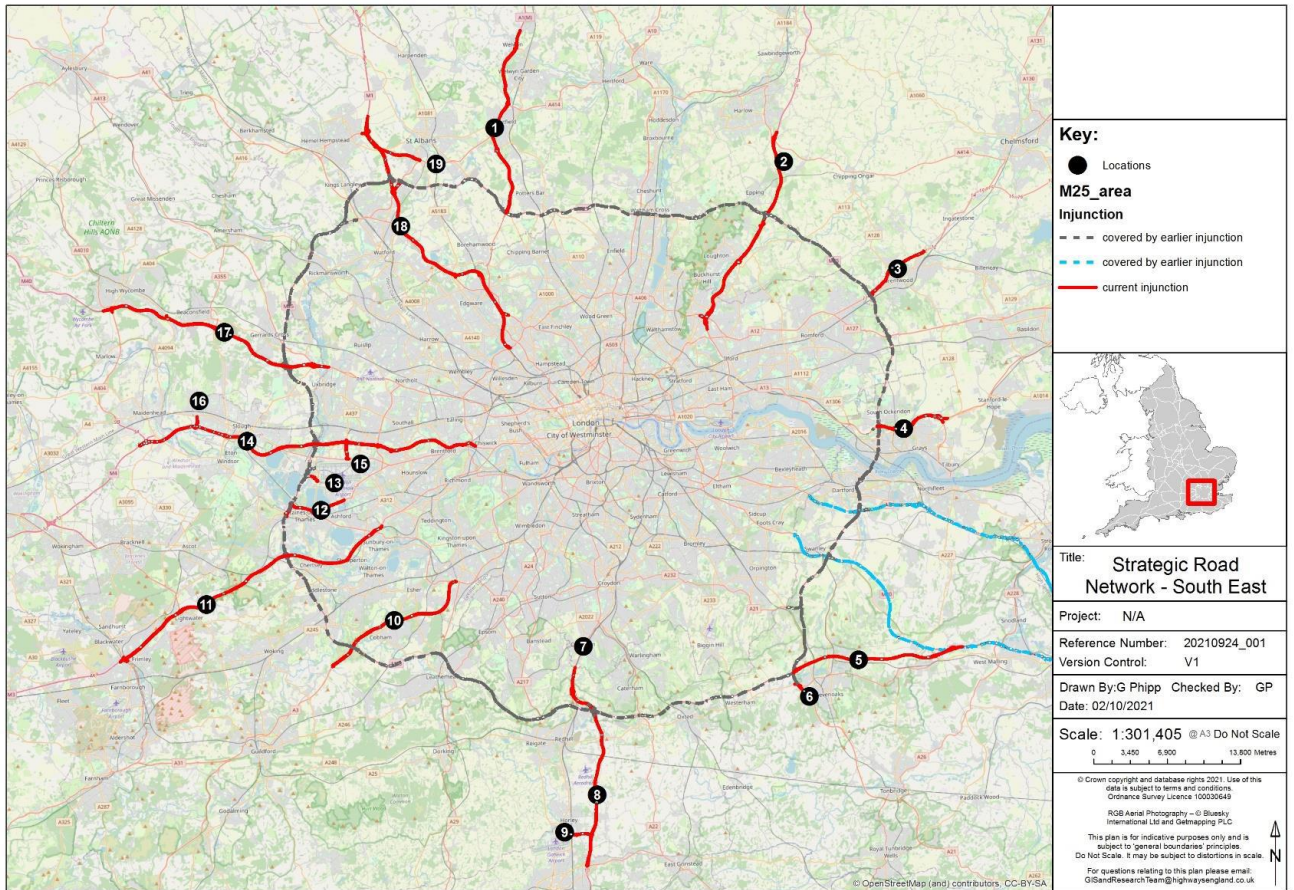
90	Ruth Jarman	
91	Sarah Hirons	
92	Serena Schellenberg	
93	Simon REDING	
94	Stefania MOROSI	
95	Stephanie AYLETT	
96	Stephen Gower	
97	Stephen Pritchard	
98	Sue Chambers	

99	Sue Parfitt	
100	Sue Spencer-Longhurst	
101	Susan HAGLEY	
102	Suzie WEBB	
103	Tam Millar	
104	Tessa-Marie Burns	
105	Teresa NORTON	
106	Tim Speers	
107	Tim William Hewes	
108	Tracey Mallaghan	

109	Tryrone Hodge	
110	Valeria SAUND ERS	
111	Venitia CARTE R	
112	Victoria Anne Lindsell	
113	Xabier GONZA LEZ TRIMM ER	

ANNEX 2

Plan and description of the Roads covered by this Order



- 1.A1(M) from Junction 1 to Junction 6
- 2.M11 from Junction 4 to Junction 7
- 3.A12 from M25 Junction 28 to A12 Junction 12
- 4.A13 from M25 Junction 30 to A1089
- 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
- 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
- 19.A414 from M1 Junction 8 to A405

SCHEDULE 1

[On the package containing the Court order and proceedings]

“VERY URGENT: THIS PACKAGE CONTAIN AN ORDER OF THE HIGH COURT AND YOU SHOULD READ IT IMMEDIATELY AND SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE CALL - Antony Nwanodi, Government Legal Department, Tel: 020 7210 3424”

[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 CALL - Antony Nwanodi, Government Legal Department, Tel: 020 7210 3424”

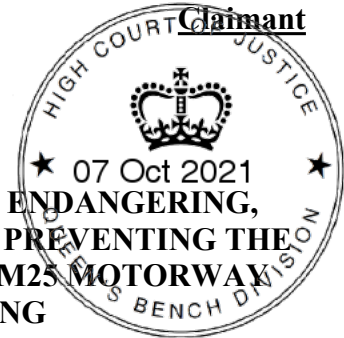
IN THE HIGH COURT OF JUSTICE Claims nos. QB-2021-003576 & 003626
QUEEN'S BENCH DIVISION
Before the Honourable Mr Justice Lavender
5 October 2021

B E T W E E N:

NATIONAL HIGHWAYS LIMITED

-and-

- (1) PERSONS UNKNOWN CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE PREVENTING THE FREE FLOW OF TRAFFIC ONTO OR ALONG THE M25 MOTORWAY FOR THE PURPOSES OF PROTESTING
- (2) PERSONS UNKNOWN CAUSING THE BLOCKING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE INTERFERING WITH THE FLOW OF TRAFFIC ONTO OR OFF OR ALONG THE A2, A20 AND 2070 TRUNK ROADS AND M2 AND M20 MOTORWAY FOR THE PURPOSE OF PROTESTING
- (3) MR ALEXANDER RODGER AND 112 OTHERS



Defendants

ORDER

UPON HEARING leading and junior counsel for the Claimant, there being no attendance by any Defendants.

AND UPON the grant of urgent interim injunctions on 21 September 2021 by Lavender J (QB-2021-003576) and on 24 September by Cavanagh J (QB-2021-003626) (“the September Orders”) and the listing of a return date hearing for the September Orders on 5 October 2021 before Lavender J.

AND UPON considering the two Orders granted by May J on 1 October 2021 (and sealed on 4 October 2021) joining Defendants to these proceedings, ordering the disclosure of information and permitting alternative service of the September Orders.

AND UPON reading the documents filed with the Court.

IT IS ORDERED THAT:

1. The return date hearing for the September Orders be adjourned to 12 October 2021 and listed together with the return date hearing for the Order made by Holgate J on 2 October 2021.

2. Time be extended for service of the particulars of claim in these two claims to 26 March 2021.
3. Paragraph 5(b) in the Order of May J of 1 October 2021 in QB-2021-003576 is amended to substitute “21st September” in place of the reference to “24th September”.
4. The Claimant has permission to serve a notice of change of solicitor in addition to other methods of service under CPR Part 6.20 in accordance with the alternative method of service prescribed in paragraph 5 of the Orders of May J dated 1 October 2021.

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

Before the Honourable Mr Justice Lavender
12 October 2021

B E T W E E N:

NATIONAL HIGHWAYS LIMITED

-and-



- (1) PERSONS UNKNOWN CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE PREVENTING THE FREE FLOW OF TRAFFIC ONTO OR ALONG THE M25 MOTORWAY FOR THE PURPOSES OF PROTESTING
- (2) PERSONS UNKNOWN CAUSING THE BLOCKING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE INTERFERING WITH THE FLOW OF TRAFFIC ONTO OR OFF OR ALONG THE A2, A20 AND 2070 TRUNK ROADS AND M2 AND M20 MOTORWAY FOR THE PURPOSE OF PROTESTING
- (3) PERSONS UNKNOWN CAUSING THE BLOCKING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE INTERFERING WITH THE FLOW OF TRAFFIC ONTO OR OFF OR ALONG THE 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
- (4) MR ALEXANDER RODGER AND 113 OTHERS

Defendants

ORDER

UPON the return date hearing for claim nos. **QB-2021-003576, 003626 and 003737** (“the Claims”) in relation to the Claimant’s three injunctions over parts of the Strategic Road Network (“the Roads”), namely that of the Honourable Mr Justice Lavender dated 21 September 2021 in Claim No. 003576; that of the Honourable Mr Justice Cavanagh dated 24 September 2021 in Claim No. 003626; and that of the Honourable Mr Justice Holgate dated 2 October 2021 in Claim No. 003737 (“the Orders”)

AND UPON READING the Witness Statement of Nicola Bell dated 11 October 2021, and the Claimant's skeleton argument dated 11 October 2021

AND UPON hearing David Elvin QC, Horatio Waller and Jonathan Welch, Counsel for the Claimant, and Dr Diana Warner (Named Defendant 28) and Liam Norton (Named Defendant 55) (both appearing in person)

AND UPON the Claimant indicating that it will provide to the Defendants copies of further evidence or other documents filed in these proceedings upon request, following the Defendants or their representatives providing contact details to the Claimant's solicitors

AND UPON the Court accepting the Claimant's undertaking that the Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss

AND UPON the Claimant undertaking to identify and name Defendants and apply to add them as named Defendants to the Claims as soon as reasonably practicable

AND UPON the Claimant confirming that this Order is not intended to prohibit lawful protest which does not slow, obstruct, prevent or otherwise interfere with the flow of traffic onto off or along the Roads nor to prevent lawful use of the Roads by any person

IT IS ORDERED THAT:

1. The Claims shall proceed and be heard together.
2. A single set of Particulars of Claim shall be served by the Claimant in respect of the Claims by 26 October 2021.
3. The Claimant has permission to amend the Schedule of Defendants in the form set out in Schedule 1 to this Order and to join additional Named Defendants (numbers 114 and 115 in Schedule 1).
4. With regard to disclosure:

- 4.1 The Chief Constables listed at paragraph 4.3 below shall disclose to the Claimant -
- (i) the name and address 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; and
 - (ii) all arrest notes, body cam footage and photographic material relating to possible breaches of the Orders.
- 4.2 The duty to disclose the matters specified in paragraph 4.1 shall continue until 5pm on 30 November 2021, unless extended by further order.
- 4.3 The duty to disclose shall apply to the following persons: the Commissioner of Police of the Metropolis and the Chief Constables of Hertfordshire, Essex, Kent, Surrey and Thames Valley.
5. The publication by the Claimant of any orders (including the Orders) and the claim forms in the Claims shall not include (in the published version) the addresses of the Named Defendants.
6. For the avoidance of doubt, the injunctions made in the three Claims shall continue in force until the earlier of (i) Trial; or (ii) Further Order.
7. The Claimant shall:
- 7.1 Place copies of this Order and the Claim Form on the National Highways and Gov.uk website; and
 - 7.2 Send a copy of this Order and the Claim Form to Insulate Britain's email address: Insulate Britain ring2021@protonmail.com.
8. The Claimant is permitted to serve this order, in addition to other methods of service applicable under CPR Part 6.20, by:
- 8.1 sending it by email to Insulate Britain; and

- 8.2 posting a copy of the order at the address given by the Police (or leaving in a separate mailbox) with a notice affixed to the front door if necessary, drawing the recipient's attention to the fact the package contains a court order. If the premises do not have a letterbox, or mailbox, a package containing the order may be affixed to the front door 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 notice shall be given in prominent lettering in the form set out in Schedule 2.
9. The Claims are adjourned to 19 October 2021 at 9.30 a.m. to be heard with the return date hearing listed by May J in her order dated 8 October 2021 granting an interim injunction on the application of Transport for London.

Further directions

10. 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 immediately (and in any event not less than 48 hours before the hearing of any such application).
11. Any person applying to vary or discharge this order must provide their full name and address, an address for service, and must also apply to be joined as a named defendant to the proceedings at the same time.
12. The Claimant has permission to apply to extend or vary this Order or for further directions.
13. Costs reserved.

Communications with the Claimant

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

FAO Petra Billing/ Rob Shaw (petra.billing@dlapiper.com / rob.shaw@dlapiper.com)

DLA Piper UK LLP
1 St Paul's Place
Sheffield
S1 2JX

Reference – Insulate Britain:366530/107

BY THE COURT

Dated: 12 October 2021

SCHEDULE 1 – NAMED DEFENDANTS (AS AMENDED 12.10.21)

	Name	Address
1	Alexander RODGER	
2	Alyson LEE	
3	Amy PRITCHARD	
4	Ana HEYATAWIN	
5	Andrew WORSLEY	
6	Anne TAYLOR	
7	Anthony WHITEHOUSE	
8	Arne SPRINGORUM	
9	Barry MITCHELL	
10	Barry MITCHELL	
11	Ben TAYLOR	
12	Benjamin BUSE	
13	Biff William Courtenay WHIPSTER	
14	Cameron FORD	
15	Catherine RENNIE-NASH	
16	Catherine EASTBURN	
17	Christian MURRAY-LESLIE	
18	Christian ROWE	
19	Cordelia ROWLATT	
20	Daniel SARGISON	
21	Daniel SHAW	

22	David CRAWFORD	
23	David JONES	
24	David NIXON	
25	David SQUIRE	
26	Diana BLIGH	
27	Diana HEKT	
28	Diana Lewen WARNER	
29	Donald BELL	
30	Edward HERBERT	
31	Elizabeth ROSSER	
32	Emily BROCKLEBANK	
33	Emma Joanne SMART	
34	Gabriella DITTON	
35	Gregory FREY	
36	Gwen HARRISON	
37	Harry BARLOW	
38	Ian BATES	
39	Ian Duncan WEBB	
40	James BRADBURY	
41	James SARGISON	
42	James THOMAS	
43	Janet BROWN	
44	Janine EAGLING	

45	Jerrard Mark LATIMER	
46	Jessica CAUSBY	
47	Jonathan COLEMAN	
48	Joseph SHEPHERD	
49	Joshua SMITH	
50	Judith BRUCE	
51	Julia MERCER	
52	Julia SCHOFIELD	
53	Karen MATTHEWS	
54	Karen WILDIN	
55	Liam NORTON	
56	Louis MCKECHNIE	
57	Louise Charlotte LANCASTER	
58	Lucy CRAWFORD	
59	Mair BAIN	
60	Margaret MALOWSKA	
61	Marguerite DOWBLEDAY	
62	Maria LEE	
63	Martin NEWELL	
64	Mary ADAMS	
65	Matthew LUNNON	
66	Matthew TULLEY	
67	Meredith WILLIAMS	

68	Michael BROWN	
69	Michael WILEY	
70	Michelle CHARLSWORTH	
71	Natalie MORLEY	
72	Nathaniel SQUIRE	
73	Nicholas COOPER	
74	Nicholas ONLEY	
75	Nicholas TILL	
76	Oliver ROCK	
77	Paul COOPER	
78	Paul SHEEKY	
79	Peter BLENCOWE	
80	Peter MORGAN	
81	Phillipa CLARKE	
82	Priyadaka CONWAY	
83	Richard RAMSDEN	
84	Rob STUART	
85	Robin COLLETT	
86	Roman Andrzej PALUCH- MACHNIK	
87	Rosemary WEBSTER	
88	Rowan TILLY	
89	Ruth Ann COOK	
90	Ruth JARMAN	

91	Sarah HIRONS
92	Serena SCHELLENBERG
93	Simon REDING
94	Stefania MOROSI
95	Stephanie AYLETT
96	Stephen GOWER
97	Stephen PRITCHARD
98	Sue CHAMBERS
99	Sue PARFITT
100	Sue SPENCER- LONGHURST
101	Susan HAGLEY
102	Suzie WEBB
103	Tam MILLAR
104	Tessa-Marie BURNS
105	Theresa NORTON
106	Tim SPEERS
107	Tim William HEWES
108	Tracey MALLAGHAN
109	Tyrone HODGE
110	Valerie SAUNDERS
111	Venitia CARTER
112	Victoria Anne LINDSELL
113	Xavier GONZALEZ TRIMMER

114	Bethany MOGIE	
115	Indigo RUMBELOW	

SCHEDULE 2

[On the package containing the Court order and proceedings]

“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 CALL [*insert contact details*]”

[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 CALL [*insert contact details*]”

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

Before the Honourable Mr Justice Lavender
19 October 2021

B E T W E E N:

NATIONAL HIGHWAYS LIMITED

-and-



- (1) PERSONS UNKNOWN CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE PREVENTING THE FREE FLOW OF TRAFFIC ONTO OR ALONG THE M25 MOTORWAY FOR THE PURPOSES OF PROTESTING**
- (2) PERSONS UNKNOWN CAUSING THE BLOCKING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE INTERFERING WITH THE FLOW OF TRAFFIC ONTO OR OFF OR ALONG THE A2, A20 AND 2070 TRUNK ROADS AND M2 AND M20 MOTORWAY FOR THE PURPOSE OF PROTESTING**
- (3) PERSONS UNKNOWN CAUSING THE BLOCKING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE INTERFERING WITH THE FLOW OF TRAFFIC ONTO OR OFF OR ALONG THE 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**
- (4) MR ALEXANDER RODGER AND 123 OTHERS**

Defendants

ORDER

UPON the court requesting that the Claimant attend for the return date hearing of the claim by Transport for London ("**TfL**") for an injunction granted by May J on an interim basis on 8 October 2021 ("**the TfL Claim**")

UPON reading the Witness Statement of Nicola Bell dated 18 October 2021, and the Claimant's skeleton argument

AND UPON hearing Counsel for the Claimant

IT IS ORDERED THAT:

1. Claim Nos. **QB-2021-003576, 003626 and 003737** and the TfL Claim shall proceed and be heard together.
2. The Claimant has permission to amend the Schedule of Defendants to join additional Named Defendants listed at Annex A to this Order, as Defendants 116 – 124.
3. With regard to disclosure:
 - 3.1 The Chief Constables listed at paragraph 3.3 below (in addition to those already under the duty pursuant to the Lavender J 12 October Order) shall disclose to the Claimant:
 - (i) the name and address 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; and
 - (ii) all arrest notes, body cam footage and photographic material relating to possible breaches of the Orders.
 - 3.2 The duty to disclose the matters specified in paragraph 3.1 shall continue until 5pm on 30 November 2021, unless extended by further order.
 - 3.3 The duty to disclose shall apply to the following persons: the Chief Constables of Hampshire, Sussex and Bedfordshire.
4. The publication by the Claimant of any orders (including the Orders) and the claim forms in the Claims shall not include (in the published version) the addresses of the named defendants.
5. The Claimant shall:
 - 5.1 Place copies of this Order on the National Highways and Gov.uk websites;
 - 5.2 Send a copy of this Order to Insulate Britain’s email address: Insulate Britain ring2021@protonmail.com.

6. The Claimant is permitted to serve this order, in addition to other methods of service applicable under CPR Part 6.20, by:

6.1 sending it by email to Insulate Britain; and

6.2 posting a copy of the order at the address given by the Police (or leaving in a separate mailbox) with a notice affixed to the front door if necessary, drawing the recipient's attention to the fact the package contains a court order. If the premises do not have a letterbox, or mailbox, a package containing the order may be affixed to the front door 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 notice shall be given in prominent lettering in the form set out in Schedule 2.

Further directions

7. 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 immediately (and in any event not less than 48 hours before the hearing of any such application).

8. Any person applying to vary or discharge this Order must provide their full name and address, an address for service, and must also apply to be joined as a named defendant to the proceedings at the same time.

9. The Claimant has permission to apply to extend or vary this Order or for further directions.

10. Costs reserved.

Communications with the Claimant

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

FAO Petra Billing/ Rob Shaw (petra.billing@dlapiper.com / rob.shaw@dlapiper.com)

DLA Piper UK LLP
1 St Paul's Place
Sheffield
S1 2JX

Reference – Insulate Britain:366530/107

BY THE COURT

Dated: 19 October 2021

ANNEX A**SCHEDULE 1 – NAMED DEFENDANTS (AS AMENDED 14.10.21)**

	Name	Address
1	Alexander RODGER	
2	Alyson LEE	
3	Amy PRITCHARD	
4	Ana HEYATAWIN	
5	Andrew WORSLEY	
6	Anne TAYLOR	
7	Anthony WHITEHOUSE	
8	Arne SPRINGORUM	
9	Barry MITCHELL	S
10	Barry MITCHELL	S
11	Ben TAYLOR	
12	Benjamin BUSE	7
13	Biff William Courtenay WHIPSTER	
14	Cameron FORD	
15	Catherine RENNIE- NASH	
16	Catherine EASTBURN	

17	Christian MURRAY-LESLIE	
18	Christian ROWE	
19	Cordelia ROWLATT	
20	Daniel SARGISON	
21	Daniel SHAW	J
22	David CRAWFORD	
23	David JONES	
24	David NIXON	
25	David SQUIRE	
26	Diana BLIGH	PL
27	Diana HEKT	
28	Diana Lewen WARNER	
29	Donald BELL	
30	Edward HERBERT	
31	Elizabeth ROSSER	an
32	Emily BROCKLEBANK	
33	Emma Joanne SMART	
34	Gabriella DITTON	
35	Gregory FREY	

36	Gwen HARRISON	
37	Harry BARLOW	
38	Ian BATES	
39	Ian Duncan WEBB	
40	James BRADBURY	
41	James SARGISON	
42	James THOMAS	
43	Janet BROWN	
44	Janine EAGLING	
45	Jerrard Mark LATIMER	
46	Jessica CAUSBY	
47	Jonathan COLEMAN	
48	Joseph SHEPHERD	
49	Joshua SMITH	
50	Judith BRUCE	
51	Julia MERCER	
52	Julia SCHOFIELD	
53	Karen MATTHEWS	
54	Karen WILDIN	

55	Liam NORTON	
56	Louis MCKECHNIE	
57	Louise Charlotte LANCASTER	
58	Lucy CRAWFORD	
59	Mair BAIN	
60	Margaret MALOWSKA	
61	Marguerite DOWBLEDAY	
62	Maria LEE	
63	Martin NEWELL	
64	Mary ADAMS	n,
65	Matthew LUNNON	
66	Matthew TULLEY	
67	Meredith WILLIAMS	
68	Michael BROWN	
69	Michael WILEY	
70	Michelle CHARLSWORTH	
71	Natalie MORLEY	
72	Nathaniel SQUIRE	
73	Nicholas COOPER	

74	Nicholas ONLEY	
75	Nicholas TILL	
76	Oliver ROCK	
77	Paul COOPER	
78	Paul SHEEKY	z,
79	Peter BLENCOWE	
80	Peter MORGAN	
81	Phillipa CLARKE	
82	Priyadaka CONWAY	
83	Richard RAMSDEN	
84	Rob STUART	
85	Robin COLLETT	
86	Roman Andrzej PALUCH-MACHNIK	
87	Rosemary WEBSTER	
88	Rowan TILLY	
89	Ruth Ann COOK	PL
90	Ruth JARMAN	
91	Sarah HIRONS	

92	Serena SCHELLENBERG	
93	Simon REDING	
94	Stefania MOROSI	
95	Stephanie AYLETT	
96	Stephen GOWER	
97	Stephen PRITCHARD	
98	Sue CHAMBERS	
99	Sue PARFITT	
100	Sue SPENCER-LONGHURST	
101	Susan HAGLEY	
102	Suzie WEBB	
103	Tam MILLAR	
104	Tessa-Marie BURNS	
105	Theresa NORTON	
106	Tim SPEERS	
107	Tim William HEWES	K
108	Tracey MALLAGHAN	
109	Tyrone HODGE	
110	Valerie SAUNDERS	

111	Venitia CARTER	
112	Victoria Anne LINSELL	
113	Xavier GONZALEZ TRIMMER	
114	Bethany MOGIE	
115	Indigo RUMBELOW	
116	Adrian TEMPLE- BROWN	
117	Ben NEWMAN	
118	Christopher PARISH	
119	Elizabeth SMAIL	e,
120	Julian MAYNARD SMITH	
121	Rebecca LOCKYER	
122	Simon MILNER- EDWARDS	
123	Stephen BRETT	
124	Virginia MORRIS	

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION
BEFORE THE HONOURABLE MRS JUSTICE THORNTON DBE
24/11/2021

BETWEEN :

NATIONAL HIGHWAYS LIMITED

-and-



(1) PERSONS UNKNOWN CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE PREVENTING THE FREE FLOW OF TRAFFIC ONTO OR ALONG THE M25 MOTORWAY FOR THE PURPOSES OF PROTESTING

(2) PERSONS UNKNOWN CAUSING THE BLOCKING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE INTERFERING WITH THE FLOW OF TRAFFIC ONTO OR OFF OR ALONG THE A2, A20 AND 2070 TRUNK ROADS AND M2 AND M20 MOTORWAY FOR THE PURPOSE OF PROTESTING

(3) PERSONS UNKNOWN CAUSING THE BLOCKING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE INTERFERING WITH THE FLOW OF TRAFFIC ONTO OR OFF OR ALONG THE 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

(4) MR ALEXANDER RODGER AND 142 OTHERS

Defendants

CONSENT ORDER

UPON the application of the Claimant

AND UPON the Chief Constables for those forces listed in the Schedule to this order having consented to an order being made in the terms set out below

WITHOUT A HEARING

AND BY CONSENT

IT IS ORDERED THAT:

1.
 - 1.1 The Chief Constables for those forces listed in the Schedule to this order shall disclose to the Claimant 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 highway referred to in these proceedings; and

- 1.2 The Chief Constables for those forces listed in the Schedule to this Order shall disclose to the Claimant all arrest notes, body camera footage and/or all other photographic material relating to the possible breaches of the Orders

And those obligations in both paragraphs 1.1 and 1.2 shall continue until the earlier of trial, further order or 23.59 pm on 24 March 2022.

2. The Claimant is to serve this order on the Police Representative named below by email only and on the Defendants by first class post or by email in circumstances where a Defendant has requested email service of documents.
3. No order for costs.
4. Permission to apply to vary or discharge this Order on 24 hours written notice to the Claimant.

Dated 24th November 2021

Schedule

The Chief Constables for the forces of:

City of London Police

Metropolitan Police Service

Avon and Somerset Constabulary

Bedfordshire Police

Cambridgeshire Constabulary

Cheshire Constabulary

Cleveland Police

Cumbria Constabulary

Derbyshire Constabulary

Devon & Cornwall Police

Dorset Police

Durham Constabulary

Essex Police

Gloucestershire Constabulary

Greater Manchester Police

Hampshire Constabulary

Hertfordshire Constabulary

Humberside Police

Kent Police

Lancashire Constabulary

Leicestershire Police

Lincolnshire Police

Merseyside Police

Norfolk Constabulary

North Yorkshire Police

Northamptonshire Police

Northumbria Police

Nottinghamshire Police

South Yorkshire Police

Staffordshire Police

Suffolk Constabulary

Surrey Police

Sussex Police

Thames Valley Police

Warwickshire Police

West Mercia Police

West Midlands Police

West Yorkshire Police

Wiltshire Police

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

Before the Honourable Mr Justice Chamberlain
On 17 March 2022

B E T W E E N:

NATIONAL HIGHWAYS LIMITED

-and-



(1) PERSONS UNKNOWN CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE PREVENTING THE FREE FLOW OF TRAFFIC ONTO OR ALONG THE M25 MOTORWAY FOR THE PURPOSES OF PROTESTING

(2) PERSONS UNKNOWN CAUSING THE BLOCKING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE INTERFERING WITH THE FLOW OF TRAFFIC ONTO OR OFF OR ALONG THE A2, A20 AND 2070 TRUNK ROADS AND M2 AND M20 MOTORWAY FOR THE PURPOSE OF PROTESTING

(3) PERSONS UNKNOWN CAUSING THE BLOCKING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE INTERFERING WITH THE FLOW OF TRAFFIC ONTO OR OFF OR ALONG THE 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

(4) MR ALEXANDER RODGER AND 142 OTHERS

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

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

FURTHER TO the Orders made in these proceedings by Lavender J on 22 September 2021 (the “**M25 Order**”), Cavanagh J on 24 September 2021 (the “**Kent Roads Order**”) and Holgate J on 4 October 2021 (the “**Feeder Roads Order**”)

AND UPON the Claimant’s application by Application Notice dated 4 March 2022, pursuant to the liberty to apply provisions at paragraph 7 of the M25 and Kent Roads Orders and paragraph 10 of the Feeder Roads Order to extend the duration of the injunctions contained at paragraph 2 of the M25 and Kent Roads Orders and paragraph 4 of the Feeder Roads Order (the “**Extension Application**”)

AND UPON READING the Witness Statement of Robert Shaw dated 4 March 2022, and the Claimant’s skeleton argument.

AND UPON hearing David Elvin QC, Counsel for the Claimant

AND UPON the Court accepting the Claimant’s undertaking that it will provide to the Defendants copies of further evidence or other documents filed in these proceedings upon request, following the Defendants or their representatives providing contact details to the Claimant’s solicitors

AND UPON the Court accepting the Claimant’s renewed undertaking that the Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss

AND UPON the Court accepting the Claimant’s renewed undertaking to identify and name Defendants and apply to add them as named Defendants to this Order as soon as reasonably practicable

AND UPON the Claimant confirming that this Order is not intended to prohibit lawful protest which does not endanger, slow, obstruct, prevent or otherwise interfere with the flow of traffic onto off or along the M25, Kent Roads or Feeder Roads nor to

prevent lawful use of the Roads by any person

AND UPON the Claimant confirming that it will file summary judgment applications in respect of Claim Nos. QB-2021-003576, 003626 and 003737 as soon as reasonably practicable

AND UPON the Chief Constables for those forces listed in Schedule 2 to this order having consented to an order being made in the terms set out below

IT IS ORDERED THAT:

Continuation of the M25 Order

1. For the purposes of this Order, the

1.1 M25 means the London Orbital Motorway including but not limited to the verges, central reservation, on- and off-slip roads, overbridges and underbridges including the Dartford Crossing and Queen Elizabeth II Bridge, and any apparatus related to that motorway.

1.2 the Kent Roads mean the A2, A20, A2070, M2 and M20 as identified in the plans annexed at Annex A to this Order, including but not limited to the verges, central reservation, on- and off-slip roads, overbridges and underbridges and any apparatus related to that motorway;

1.3 the Feeder Roads mean the A1(M) (Junction 1 to Junction 6), M11 (Junction 4 to Junction 7), A12 (M25 Junction 28 to A12 Junction 12), A13 (M25 Junction 30 to A1089), 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), 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) and A414 (M1 Junction 8 to A405) as identified by the descriptions and plan annexed at Annex B to this Order, including but not

limited to the verges, central reservation, on- and off-slip roads, overbridges and underbridges, including any roundabouts for access to and from the Feeder Roads, and any apparatus related to those roads.

(together the “**Roads**”).

Continuation of the M25 Order

2. The long-stop date of 21 March 2022 be deleted, and the injunction at paragraph 2 of the M25 Order as set out in full at paragraph 3 below shall continue until 9 May 2022 or further order.

Injunction in force – M25 Order

3. With immediate effect and until the earlier of (i) Trial; (ii) Further Order; or (iii) 23.59 pm on 9 May 2022, the Defendants and each of them are forbidden from:
 - 3.1 Blocking, endangering, slowing down, preventing, or obstructing the free flow of traffic onto or along or off the M25 for the purposes of protesting.
 - 3.2 Causing damage to the surface of or to any apparatus on or around the M25 including but not limited to painting, damaging by fire, or affixing any item or structure thereto.
 - 3.3 Affixing themselves (“locking on”) to any other person or object on the M25.
 - 3.4 Erecting any structure on the M25.
 - 3.5 Tunnelling in the vicinity of the M25.
 - 3.6 Entering onto the M25 unless in a motor vehicle.
 - 3.7 Abandoning any vehicle or item on the M25 with the intention of causing an obstruction.
 - 3.8 Refusing to leave the area of the M25 when asked to do so by a police constable, National Highways Traffic Officer or High Court Enforcement Officer.

3.9 Causing, assisting or encouraging any other person to do any act prohibited by paragraphs 3.1 – 3.8 above.

3.10 Continuing any act prohibited by paragraphs 3.1 – 3.9 above.

Continuation of the Kent Roads Order

4. The long-stop date of 24 March 2022 be deleted, and the injunction at paragraph 2 of the Kent Roads Order as set out in full at paragraph 5 below shall continue until 9 May 2022 or further order.

Injunction in force - Kent Roads Order

5. With immediate effect and until the earlier of (i) Trial; (ii) Further Order; or (iii) 23.59 pm on 9 May 2022, the Defendants and each of them are forbidden from:

5.1 Blocking, slowing down, obstructing or otherwise interfering with the flow of traffic onto or along or off the Roads for the purpose of protesting.

5.2 Blocking, slowing down, obstructing or otherwise interfering with access to or from the Roads, and on any adjacent roads, slip roads or roundabouts which are not vested in the Claimant, for the purpose of protesting.

5.3 Causing damage to the surface of or to any apparatus on or around the Roads including but not limited to painting, damaging by fire, or affixing any item or structure thereto.

5.4 Affixing themselves (“locking on”) to any other person or object on the Roads.

5.5 Erecting any structure on the Roads.

5.6 Tunnelling in the vicinity of the Roads.

5.7 Entering onto the Roads unless in a motor vehicle.

5.8 Abandoning any vehicle or item on the Roads with the intention of causing an obstruction.

- 5.9 Refusing to leave the area within 50m of the centre of the Roads when asked to do so by a police constable, National Highways Traffic Officer or High Court Enforcement Officer.
- 5.10 Causing, assisting or encouraging any other person to do any act prohibited by paragraphs 5.1 – 5.9 above.
- 5.11 Continuing any act prohibited by paragraphs 5.1 – 5.10 above.

Continuation of the Feeder Roads Order

- 6. The long-stop date of 24 March 2022 be deleted, and the injunction at paragraph 4 of the Feeder Roads Order as set out in full at paragraph 7 below shall continue 9 May 2022 or further order.

Injunction in force – Feeder Roads Order

- 7. With immediate effect and until the earlier of (i) Trial; (ii) Further Order; or (iii) 23.59 pm on 9 May 2022, the Defendants and each of them are forbidden from:
 - 7.1 Blocking, slowing down, obstructing or otherwise interfering with the flow of traffic onto or along or off the Roads for the purpose of protesting.
 - 7.2 Blocking, slowing down, obstructing or otherwise interfering with access to or from the Roads, and on any adjacent roads, slip roads or roundabouts which are not vested in the Claimant, for the purpose of protesting.
 - 7.3 Causing damage to the surface of or to any apparatus on or around the Roads including but not limited to painting, damaging by fire, or affixing any item or structure thereto.
 - 7.4 Affixing themselves (“locking on”) to any other person or object on the Roads.
 - 7.5 Erecting any structure on the Roads.
 - 7.6 Tunnelling in the vicinity of the Roads.
 - 7.7 Entering onto the Roads unless in a motor vehicle.

- 7.8 Abandoning any vehicle or item on the Roads with the intention of causing an obstruction.
- 7.9 Refusing to leave the area within 50m of the centre of the Roads when asked to do so by a police constable, National Highways Traffic Officer or High Court Enforcement Officer.
- 7.10 Causing, assisting or encouraging any other person to do any act prohibited by paragraphs 7.1 – 7.9 above.
- 7.11 Continuing any act prohibited by paragraphs 7.1 – 7.10 above.

Alternative Service

8. The Claimant is permitted in addition to personal service to serve this Order and other documents in these proceedings by the following three methods:
 - 8.1 placing a copy of this Order on the National Highways website; and
 - 8.2 sending a copy of this Order to Insulate Britain's email addresses: Insulate Britain ring2021@protonmail.com and insulatebritainlegal@protonmail.com; and
 - 8.3 posting a copy of this Order together with covering letter through the letterbox of each Defendant (or leaving in a separate mailbox) with a notice affixed to the front door if necessary, drawing the recipient's attention to the fact the package contains a court order. If the premises do not have a letterbox, or mailbox, a package containing this Order may be affixed to the front door 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 Schedule 1; or
 - 8.4 instead of by post as set out in paragraph 8.3 above, by email in circumstances where a Defendant has requested email service of documents.
9. Compliance with paragraph 8 shall constitute service of this Order.

Third-Party Disclosure

10. The disclosure obligations contained in the order of Thornton J dated 24 November 2021, as set out in full at paragraph 11 below, shall be extended to continue until 31 July 2022 or further order.
11. The Chief Constables for those forces listed in the Schedule to this order shall disclose to the Claimant:
 - 11.1 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 highway referred to in these proceedings; and
 - 11.2 all arrest notes, body camera footage and/or all other photographic material relating to possible breaches of the Orders.
12. The Claimant is to serve this order on the Police Representative Assistant Chief Constable Owen Weatherill (owen.weatherill@npocc.police.uk), by email only.

Further directions

13. 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 immediately (and in any event not less than 48 hours before the hearing of any such application).
14. Any person applying to vary or discharge this order must provide their full name and address, an address for service, and must also apply to be joined as a named defendant to the proceedings at the same time (to the extent they are not already so named).
15. The Claimant has permission to apply to extend or vary this Order or for further directions.
16. The Claimant is to file its application for summary judgment ("**the Application**") by 4pm on 25 March 2022.
17. The Claimant is to serve the Application and evidence in support thereof on the Defendants by 4pm on 5 April 2022.

18. Any Defendant wishing to file evidence in response to the Application is to file and serve such evidence in response by 4pm on 22 April 2022.
19. The Claimant and any Defendant wishing to file a Skeleton Argument are to file and serve a Skeleton Argument by 4pm on 27 April 2022.
20. The Application is listed for 4-5 May 2022 with a time estimate of 2 days, with 3 May 2022 set aside as a judicial reading day.
21. Costs reserved.

Communications with the Claimant

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

FAO Petra Billing/ Rob Shaw (petra.billing@dlapiper.com /
rob.shaw@dlapiper.com)

DLA Piper UK LLP
1 St Paul's Place
Sheffield
S1 2JX

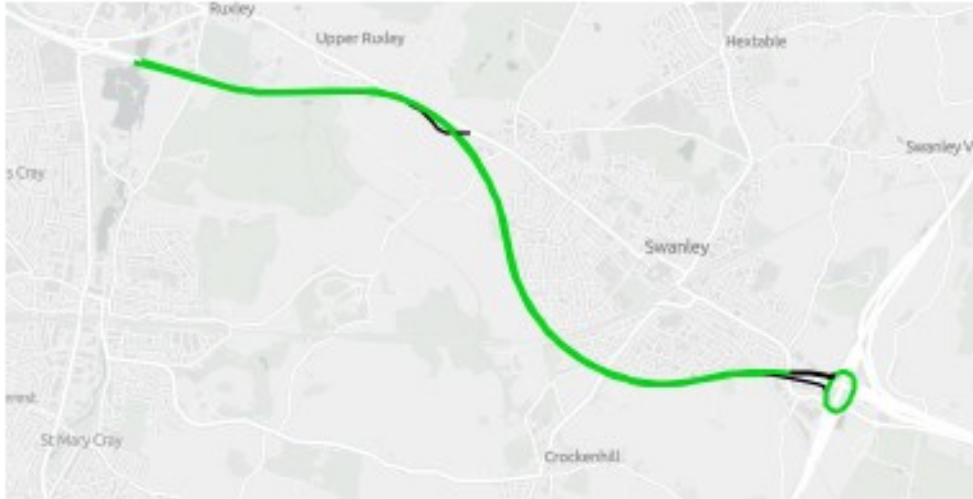
Reference – RXS/366530/107

BY THE COURT

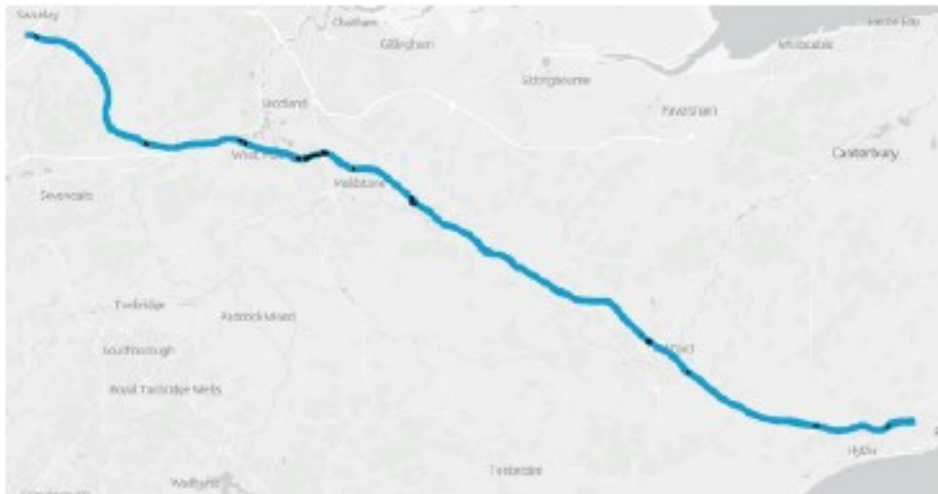
Dated: 18 March 2022

ANNEX A

A20 London - M25



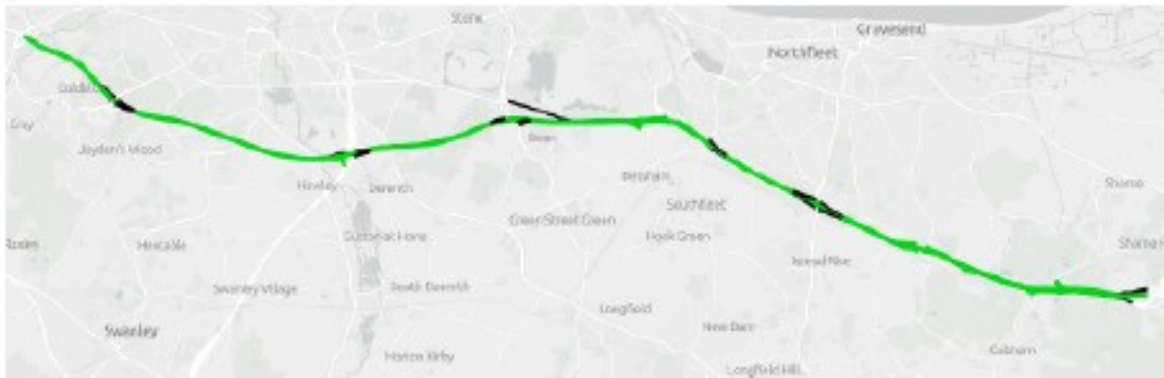
M20



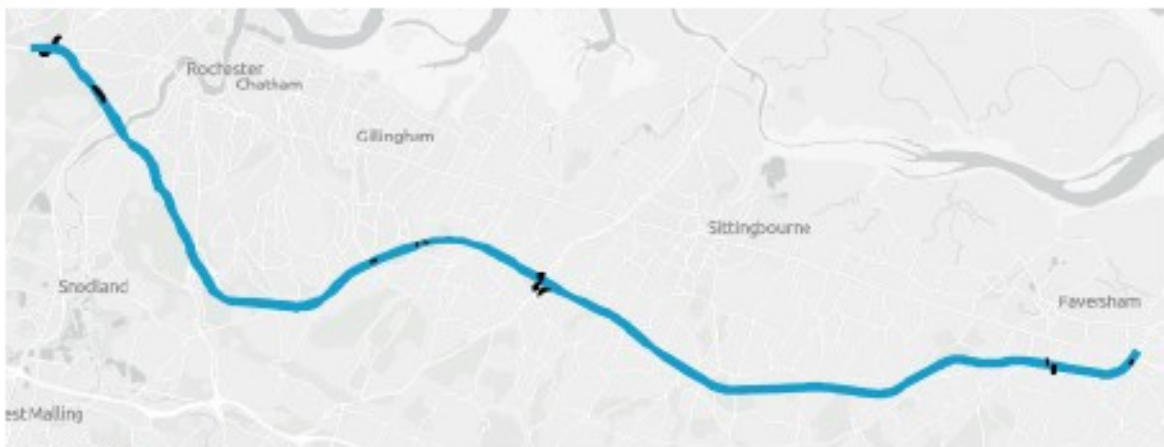
A20 Coast Section



A2 London – M2 Section



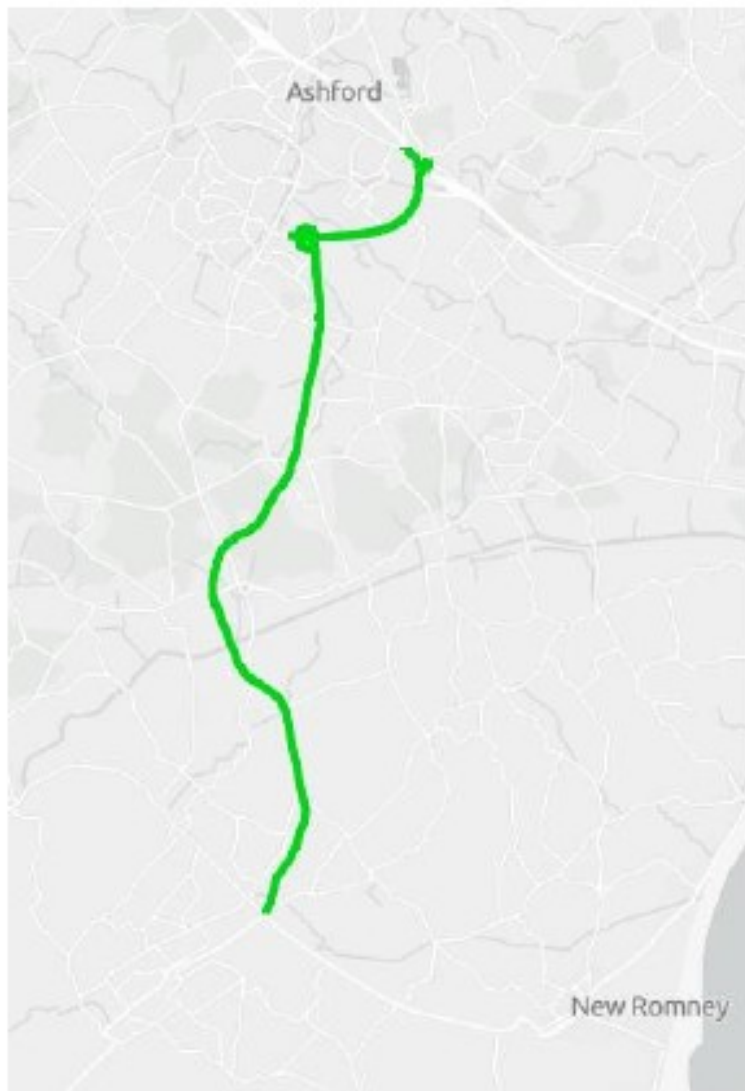
M2



A2 M2 - Dover Section



A2070

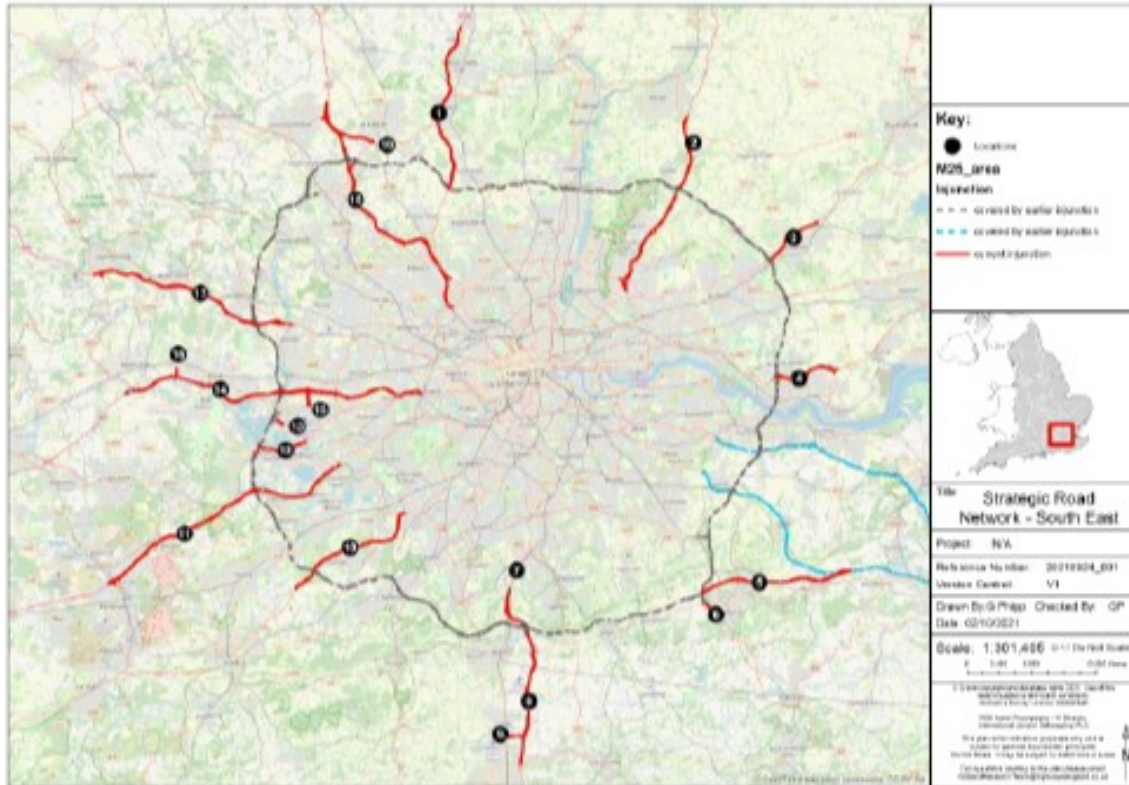


Kent & Surrounding areas SRN



ANNEX B

Plan and description of the Roads covered by this Order



- 1.A1(M) from Junction 1 to Junction 6
- 2.M11 from Junction 4 to Junction 7
- 3.A12 from M25 Junction 28 to A12 Junction 12
- 4.A13 from M25 Junction 30 to A1089
- 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
- 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
- 19.A414 from M1 Junction 8 to A405

SCHEDULE 1 - NOTICES

[On the package containing this order]

“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 CALL [XXXXXX]”

[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 CALL [XXXXXX]”

SCHEDULE 2

CHIEF CONSTABLES OF THE FORCES OF:

City of London Police

Metropolitan Police Service

Avon and Somerset Constabulary

Bedfordshire Police

Cambridgeshire Constabulary

Cheshire Constabulary

Cleveland Police

Cumbria Constabulary

Derbyshire Constabulary

Devon & Cornwall Police

Dorset Police

Durham Constabulary

Essex Police

Gloucestershire Constabulary

Greater Manchester Police

Hampshire Constabulary

Hertfordshire Constabulary

Humberside Police

Kent Police

Lancashire Constabulary

Leicestershire Police

Lincolnshire Police

Merseyside Police

Norfolk Constabulary

North Yorkshire Police

Northamptonshire Police

Northumbria Police

Nottinghamshire Police
South Yorkshire Police
Staffordshire Police
Suffolk Constabulary
Surrey Police
Sussex Police
Thames Valley Police
Warwickshire Police
West Mercia Police
West Midlands Police
West Yorkshire Police
Wiltshire Police

SCHEDULE 3 – NAMED DEFENDANTS (AS AT 15.03.2022)

	Name	Address
1.	Alexander RODGER	[REDACTED]
2.	Alyson LEE	[REDACTED]
3.	Amy PRITCHARD	[REDACTED]
4.	Ana HEYATAWIN	[REDACTED]
5.	Andrew Taylor WORSLEY	[REDACTED]
6.	Anne TAYLOR	[REDACTED]
7.	Anthony WHITEHOUSE	[REDACTED]
8.	Arne SPRINGORUM	[REDACTED] [REDACTED]
9.	Barry MITCHELL	[REDACTED]
10.	Ben TAYLOR	[REDACTED]
11.	Benjamin BUSE	[REDACTED]
12.	Biff William Courtenay WHIPSTER	[REDACTED]
13.	Cameron FORD	[REDACTED]
14.	Catherine RENNIE- NASH	[REDACTED]
15.	Catherine EASTBURN	[REDACTED]
16.	Christian MURRAY- LESLIE	[REDACTED]

17.	Christian ROWE	[REDACTED]
18.	Cordelia ROWLATT	[REDACTED]
19.	Daniel Lee Charles SARGISON	[REDACTED]
20.	Daniel SHAW	[REDACTED]
21.	David CRAWFORD	[REDACTED]
22.	David JONES	[REDACTED]
23.	David NIXON	[REDACTED]
24.	David SQUIRE	[REDACTED]
25.	Diana Elizabeth BLIGH	[REDACTED]
26.	Diana HEKT	[REDACTED]
27.	Diana Lewen WARNER	[REDACTED]
28.	Donald BELL	[REDACTED]
29.	Edward Leonard HERBERT	[REDACTED]
30.	Elizabeth ROSSER	[REDACTED]
31.	Emily BROCKLEBANK	[REDACTED]
32.	Emma Joanne SMART	[REDACTED]
33.	Gabriella DITTON	[REDACTED]
34.	Gregory FREY	[REDACTED]

35.	Gwen HARRISON	[REDACTED]
36.	Harry BARLOW	[REDACTED]
37.	Ian BATES	[REDACTED]
38.	Ian Duncan WEBB	[REDACTED]
39.	James BRADBURY	[REDACTED]
40.	James Malcolm Scott SARGISON	[REDACTED]
41.	James THOMAS	[REDACTED]
42.	Janet BROWN	[REDACTED]
43.	Janine EAGLING	[REDACTED]
44.	Jerrard Mark LATIMER	[REDACTED] [REDACTED]
45.	Jessica CAUSBY	[REDACTED]
46.	Jonathan Mark COLEMAN	[REDACTED]
47.	Joseph SHEPHERD	[REDACTED]
48.	Joshua SMITH	[REDACTED]
49.	Judith BRUCE	[REDACTED]
50.	Julia MERCER	[REDACTED]
51.	Julia SCHOFIELD	[REDACTED]

52.	Karen MATTHEWS	[REDACTED]
53.	Karen WILDIN	[REDACTED] [REDACTED]
54.	Liam NORTON	[REDACTED]
55.	Louis MCKECHNIE	[REDACTED] [REDACTED]
56.	Louise Charlotte LANCASTER	[REDACTED] [REDACTED]
57.	Lucy CRAWFORD	[REDACTED]
58.	Mair BAIN	[REDACTED]
59.	Margaret MALOWSKA	[REDACTED]
60.	Marguerite DOWBLEDAY	[REDACTED]
61.	Maria LEE	[REDACTED]
62.	Martin John NEWELL	[REDACTED]
63.	Mary ADAMS	[REDACTED] [REDACTED]
64.	Matthew LUNNON	[REDACTED]
65.	Matthew TULLEY	[REDACTED] [REDACTED]
66.	Meredith WILLIAMS	[REDACTED]
67.	Michael BROWN	[REDACTED]
68.	Michael Anthony WILEY	[REDACTED]

69.	Michelle CHARLSWORTH	[REDACTED]
70.	Natalie Clare MORLEY	[REDACTED]
71.	Nathaniel SQUIRE	[REDACTED]
72.	Nicholas COOPER	[REDACTED]
73.	Nicholas ONLEY	[REDACTED]
74.	Nicholas TILL	[REDACTED]
75.	Oliver ROCK	[REDACTED]
76.	Paul COOPER	[REDACTED]
77.	Paul SHEEKY	[REDACTED]
78.	Peter BLENCOWE	[REDACTED]
79.	Peter MORGAN	[REDACTED]
80.	Phillipa CLARKE	[REDACTED]
81.	Priyadaka CONWAY	[REDACTED]
82.	Richard RAMSDEN	[REDACTED]
83.	Rob STUART	[REDACTED]
84.	Robin Andrew COLLETT	[REDACTED]
85.	Roman Andrzej PALUCH-MACHNIK	[REDACTED]
86.	Rosemary WEBSTER	[REDACTED]

87.	Rowan TILLY	[REDACTED]
88.	Ruth Ann COOK	[REDACTED]
89.	Ruth JARMAN	[REDACTED]
90.	Sarah HIRONS	[REDACTED]
91.	Serena SCHELLENBERG	[REDACTED]
92.	Simon REDING	[REDACTED]
93.	Stefania MOROSI	[REDACTED]
94.	Stephanie AYLETT	[REDACTED]
95.	Stephen Charles GOWER	[REDACTED]
96.	Stephen PRITCHARD	[REDACTED]
97.	Susan CHAMBERS	[REDACTED]
98.	Sue PARFITT	[REDACTED]
99.	Sue SPENCER-LONGHURST	[REDACTED]
100.	Susan HAGLEY	[REDACTED]
101.	Suzie WEBB	[REDACTED]
102.	Tam MILLAR	[REDACTED]
103.	Tessa-Marie BURNS	[REDACTED]

104.	Theresa NORTON	[REDACTED]
105.	Tim SPEERS	[REDACTED]
106.	Tim William HEWES	[REDACTED]
107.	Tracey MALLAGHAN	[REDACTED]
108.	Valerie SAUNDERS	[REDACTED]
109.	Venitia CARTER	[REDACTED]
110.	Victoria Anne LINDSELL	[REDACTED]
111.	Xavier GONZALEZ TRIMMER	[REDACTED]
112.	Bethany MOGIE	[REDACTED]
113.	Indigo RUMBELOW	[REDACTED]
114.	Adrian TEMPLE-BROWN	[REDACTED]
115.	Ben NEWMAN	[REDACTED]
116.	Christopher PARISH	[REDACTED]
117.	Elizabeth SMAIL	[REDACTED]
118.	Julian MAYNARD SMITH	[REDACTED]
119.	Rebecca LOCKYER	[REDACTED]
120.	Simon MILNER-EDWARDS	[REDACTED]
121.	Stephen BRETT	[REDACTED]

122.	Virginia MORRIS	[REDACTED]
123.	Andria EFTHIMIOUS-MORDAUNT	[REDACTED] [REDACTED]
124.	Ben HORTON	[REDACTED]
125.	Christopher FORD	[REDACTED]
126.	Darcy MITCHELL	[REDACTED]
127.	David MANN	[REDACTED]
128.	Ellie LITTEN	[REDACTED]
129.	Hannah SHAFER	[REDACTED]
130.	Jesse LONG	[REDACTED]
131.	Julie MACOLI	[REDACTED]
132.	Kai BARTLETT	[REDACTED]
133.	Marc SABITSKY	[REDACTED]
134.	Sophie FRANKLIN	[REDACTED]
135.	Tony HILL	[REDACTED]
136.	Nicholas BENTLEY	[REDACTED]
137.	Thomas FRANKE	[REDACTED]
138.	Nicola STICKELLS	[REDACTED]

139.	Mary LIGHT	[REDACTED]
140.	David McKENNY	[REDACTED]
141.	Giovanna LEWIS	[REDACTED]
142.	William WRIGHT	[REDACTED]
143.	Margaret REID	[REDACTED]

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

BEFORE: MR JUSTICE BENNATHAN

Claim No: QB-2021-003576, QB-2021-003626, QB-2021-003737

B E T W E E N:

NATIONAL HIGHWAYS LIMITED

-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 A413-033626 ROADS AND THE M1, M3, M4, M4 SPUR, M11, M26, M23 AND M40 MOTORWAYS FOR THE PURPOSE OF PROTESTING

(2) MR ALEXANDER RODGER AND 132 OTHERS

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

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

UPON the application of the Claimant for summary judgment (“the Application”)

AND UPON hearing Myriam Stacey QC, Admas Habteslasie and Michael Fry for the Claimant, and Owen Greenhall for Jessica Branch being a person who is not a party to the proceedings but who was permitted to make representations pursuant to CPR r. 40.9.

AND UPON the Claimant 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 4 of this Order (“**the Roads**”).

IT IS ORDERED THAT:

1. The “Named Defendants” are now those Defendants with their numerical designations (e.g. D1, D2 etc.) whose names appear in the revised and re-numbered Schedule 1 annexed to this Order to reflect the Order made at paragraph 8.

2. The “Contemnor Defendants” refers to a sub-set of the Named Defendants, being the Named Defendants who have been found in contempt of Court in these proceedings, namely:
 - 2.1. Ana Heyatawin (D5)
 - 2.2. Ben Taylor (D10)
 - 2.3. Benjamin Buse (D11)
 - 2.4. Biff Whipster (D12)
 - 2.5. Christian Rowe (D17)
 - 2.6. David Nixon (D23)
 - 2.7. Diana Warner (D27)
 - 2.8. Ellie Litten (D124)
 - 2.9. Emma Smart (D31)
 - 2.10. Gabriella Ditton (D32)
 - 2.11. Indigo Rumbelow (D110)
 - 2.12. James Thomas (D40)
 - 2.13. Louis McKechnie (D54)
 - 2.14. Oliver Rock (D74)
 - 2.15. Paul Sheeky (D76)
 - 2.16. Richard Ramsden (D81)
 - 2.17. Roman Paluch-Machnik (D84)
 - 2.18. Ruth Jarman (D88)
 - 2.19. Stephanie Aylett (D92)

- 2.20. Stephen Gower (D93)
 - 2.21. Stephen Pritchard (D94)
 - 2.22. Sue Parfitt (D96)
 - 2.23. Theresa Norton (D101)
 - 2.24. Tim Speers (D102)
3. The term “Defendants” refers to both “persons unknown” as defined as First Defendant in paragraph 6, the Named Defendants, and the Contemnor Defendants.
 4. For the purposes of this Order, “the Roads” shall mean all of the following:
 - 4.1. The M25, meaning the London Orbital Motorway and shown in red on the plans at Appendix 1 annexed to this Order.
 - 4.2. 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.
 - 4.3. 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;

4.4. 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, lay-bys, police observation points/park up points, and emergency refuge areas.

Consolidation and Consequential Amendments

5. The three claims (QB-2021-003576, 003626 and 00737) are hereby consolidated.
6. The Claimant has permission to amend the description of the First Defendant in the consolidated claim to:

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

7. As this is a simple amalgamation of the existing categories of the First Defendants in each of the original claims, the requirements in the CPR to amend other documents in the proceedings and to serve those amended documents on the Defendants is dispensed with.
8. The following defendants are to be removed as defendants:
 - 8.1. Tam Millar
 - 8.2. Hannah Shafer
 - 8.3. Jesse Long
 - 8.4. Thomas Franke
 - 8.5. William Wright
 - 8.6. Arne Springorum
 - 8.7. Ben Horton
 - 8.8. Emily Brocklebank

8.9. Marc Savitsky

8.10. Serena Schellenberg

Injunction in Force

9. The Order of Mr Justice Chamberlain dated 17 March 2022 which continued the M25, Kent Roads and Feeder Roads Orders (“Extension Order”) shall continue and remain in force until 23.59 hrs on 9 June 2022. The Injunctions are not repeated within the body of this Order to avoid confusion. The Extension Order less appendices is appended to this Order at Schedule 2.

Interim Injunction

10. From 10 June 2022 and until 23.59 hrs on 9 May 2023 or until further Order the Defendants (excluding the Contemnor Defendants) and each of them are forbidden from:

- 10.1. 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, tunnelling within 25m of the Roads, abandoning any object, erecting any structure on the Roads or otherwise causing, assisting, facilitating or encouraging any of those matters.

- 10.2. 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.

- 10.3 Entering on foot those parts of the Roads which are not authorised for access on foot, other than in cases of emergency.

Final Injunction

11. From 10 June 2022 until 23.59 hrs on 9 May 2023 the Contemnor Defendants and each of them are forbidden from:

- 11.1. 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, tunnelling within 25m of

the Roads, abandoning any object, erecting any structure on the Roads or otherwise causing, assisting, facilitating or encouraging any of those matters.

11.2. 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.

11.3 Entering on foot those parts of the Roads which are not authorised for access on foot, other than in cases of emergency.

Alternative service

12. The Claimant is permitted in addition to personal service to serve this Order on Named Defendants by the following methods together:

12.1. service of the sealed Order on Insulate Britain by email to their known email addresses insulatebritainlegal@protonmail.com and ring2021@protonmail.com; and

12.2. posting a copy of this Order through the letterbox of each Named Defendant (or leaving it in a separate mailbox) with a notice affixed to the front door if necessary, drawing the recipient's attention to the fact the package contains a Court Order. If the premises do not have a letterbox, or mailbox, a package containing this Order may be affixed to the front door 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.

13. The Claimants are directed to take the following steps to publicise the existence of this Order:

13.1. Placing copies of the Order on the National Highways website;

13.2. Advertising the existence of this Order in the London Gazette;

13.3. Sending a copy of this Order to Insulate Britain's known email addresses: ring2021@protonmail.com and insulatebritainlegal@protonmail.com.

14. For the avoidance of doubt, persons who have not been served with this Order by an acceptable method are not bound by its terms. Compliance with paragraphs 12.1 and 13.1 – 13.3 above **does not constitute service** on any Defendant, nor does a failure to comply with paragraph 13 above constitute a failure of service.

Third-Party Disclosure

15. Pursuant to CPR 31.17, the Chief Constables for those forces listed in Schedule 3 to this Order shall procure that the officers within their forces disclose to the Claimant:

- 15.1. 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

- 15.2. all arrest notes, body camera footage and/or all other photographic material relating to possible breaches of this Order.

16. Without the permission of the Court, the Claimants shall not make use of any document disclosed by virtue of paragraph 15 of this Order, other than for one or more of the following uses:

- (i) 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;

- (ii) investigating, formulating, pleading and prosecuting any claim within these proceedings arising out of any alleged breach of this Order;

- (iii) 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.

17. Until further Order, the postal address and/or address for service of any person who is added as a 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.

18. The Claimant is to serve this order on the Police Representative Assistant Chief Constable Owen Weatherill (owen.weatherill@npocc.police.uk), by email only.

Further directions

19. There shall be listed in April 2023 a hearing at which the Court shall review whether it should vary or discharge this Order or any part.
20. 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 Claimants' solicitors by email to the addresses specified at paragraph 28 below 48 hours before making such application of the nature of such application and the basis for it.
21. 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.
22. The Contemnor Defendants have a right to apply for summary judgment as against them to be set aside in accordance with CPR PD 24.8.
23. The Claimants have liberty to apply to extend, vary or discharge this Order, or for further directions.
24. No acknowledgment of service, admission or defence is required by any party until further so ordered.
25. Costs reserved.

Communications with the Claimant

26. 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

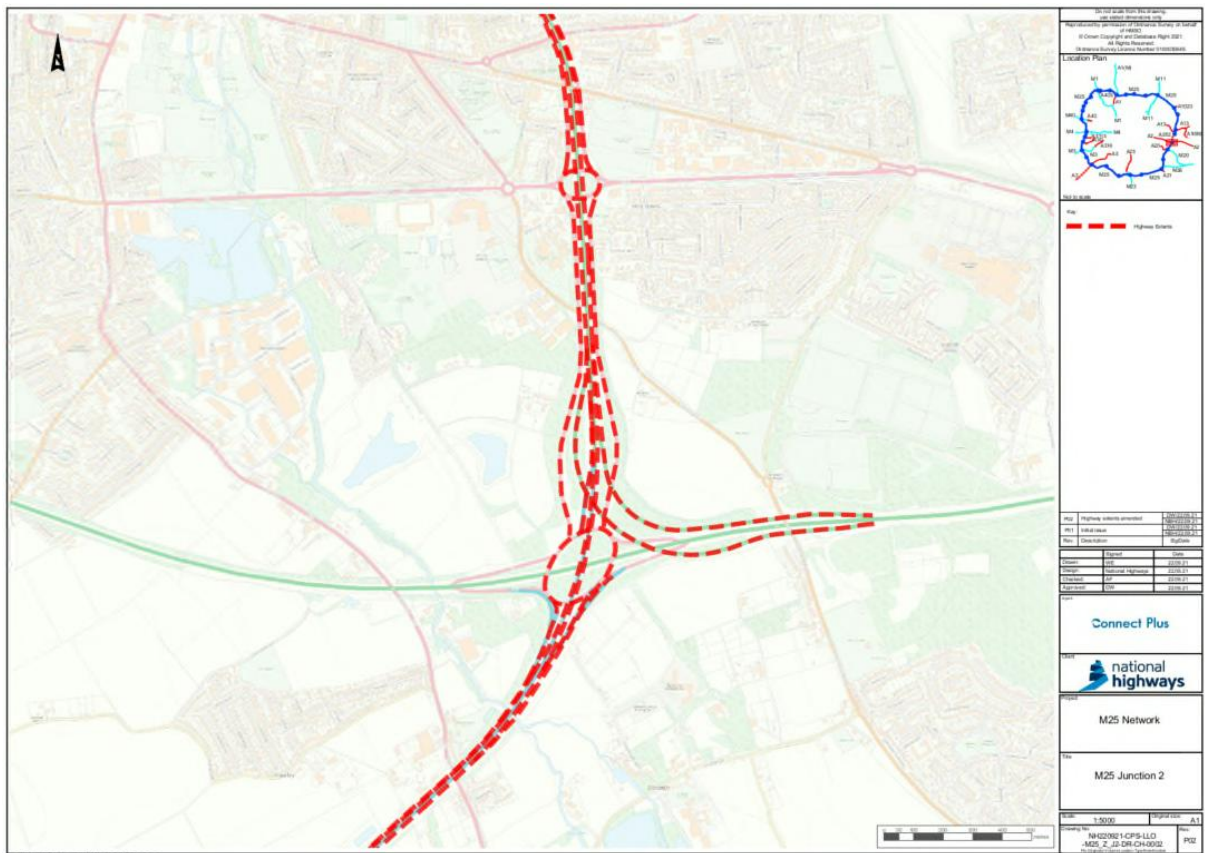
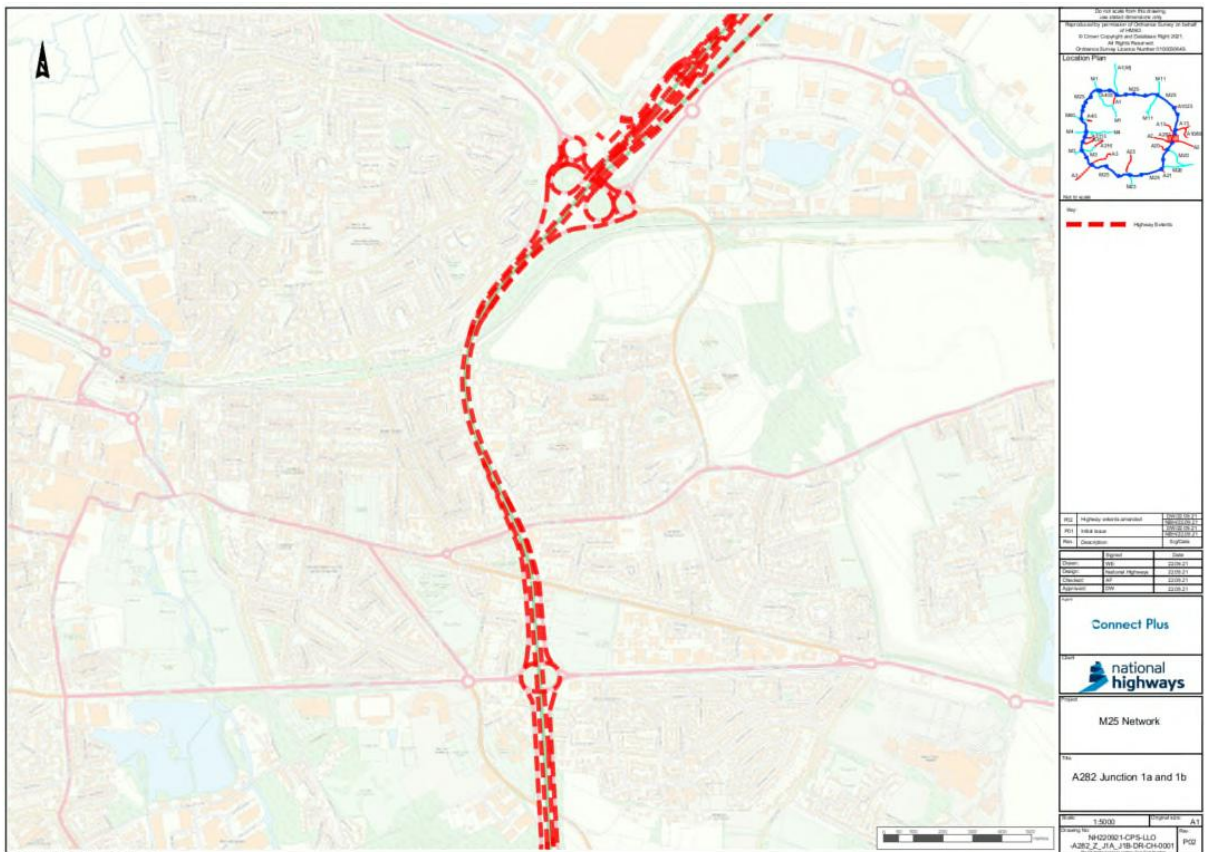
E: petra.billing@dlapiper.com and rob.shaw@dlapiper.com

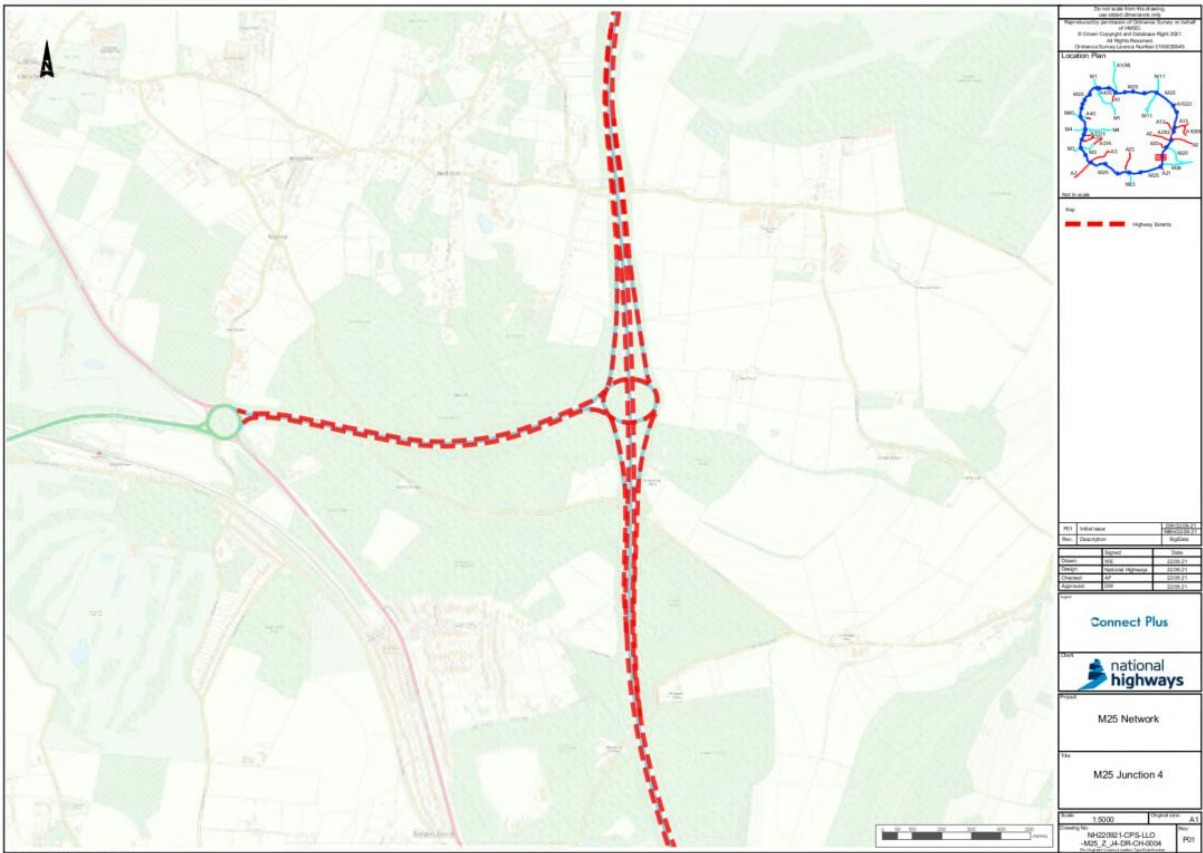
T: 0207 796 6047 / 0114 283 3312

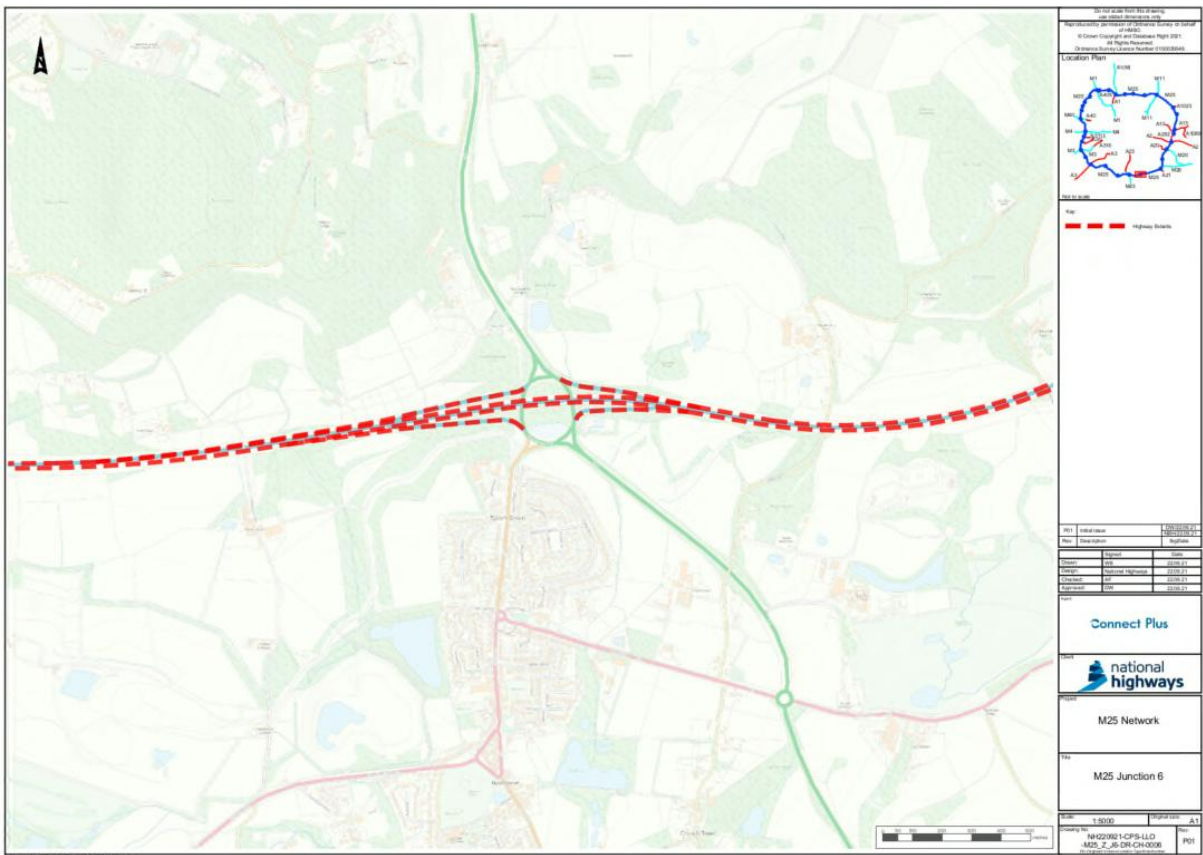
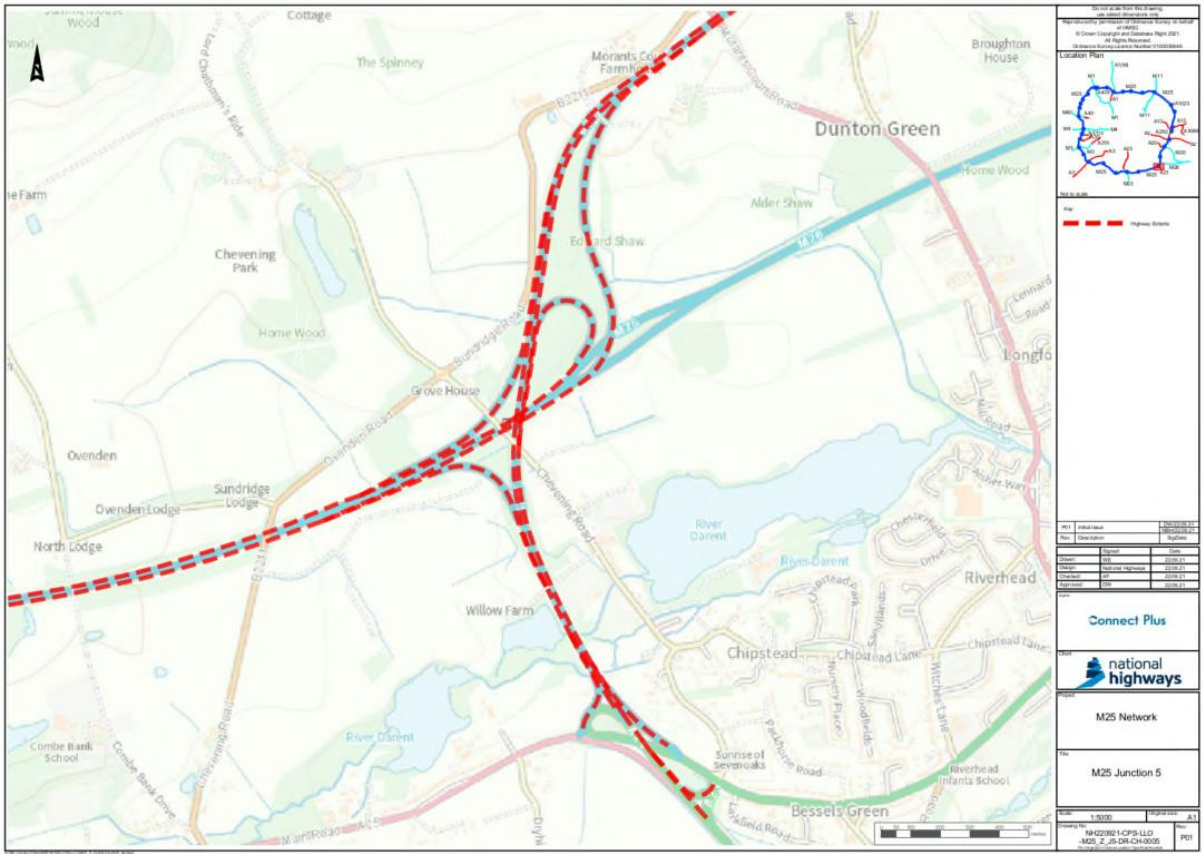
9 May 2022

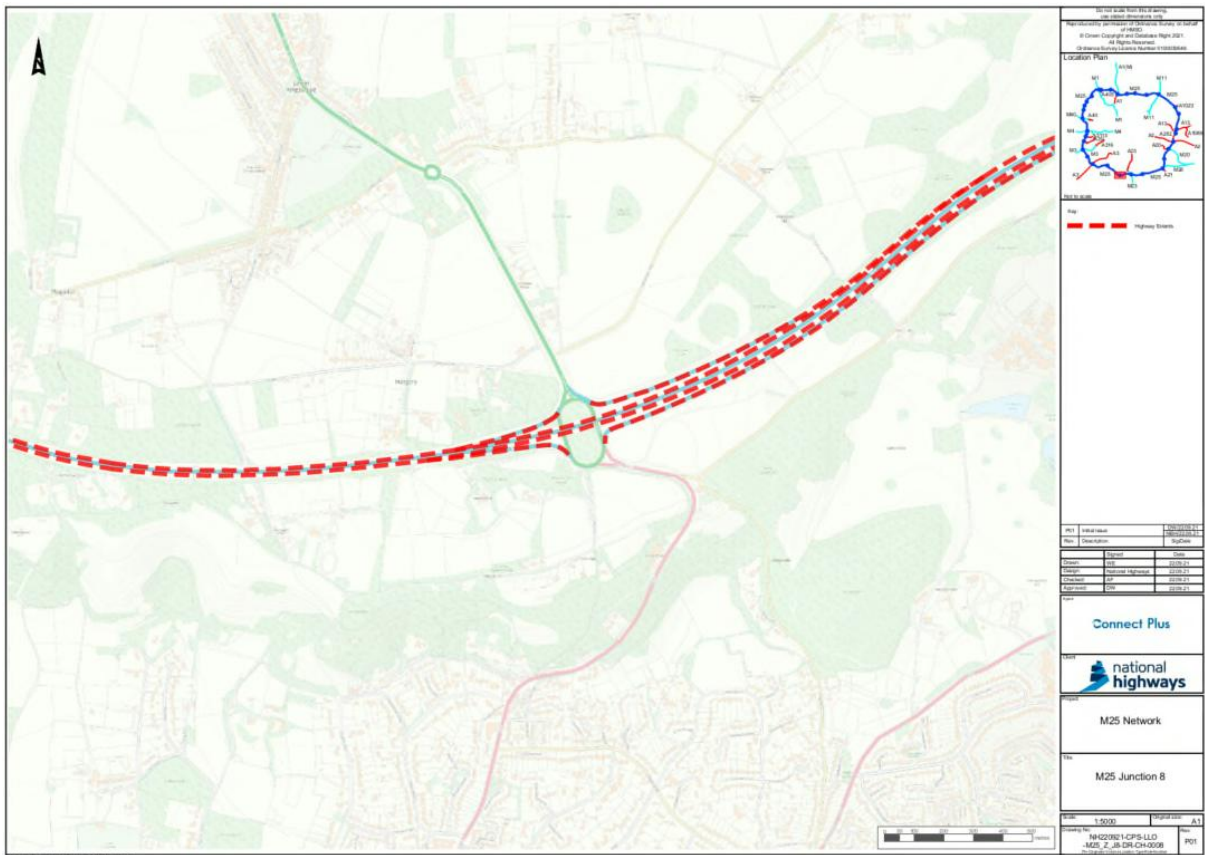
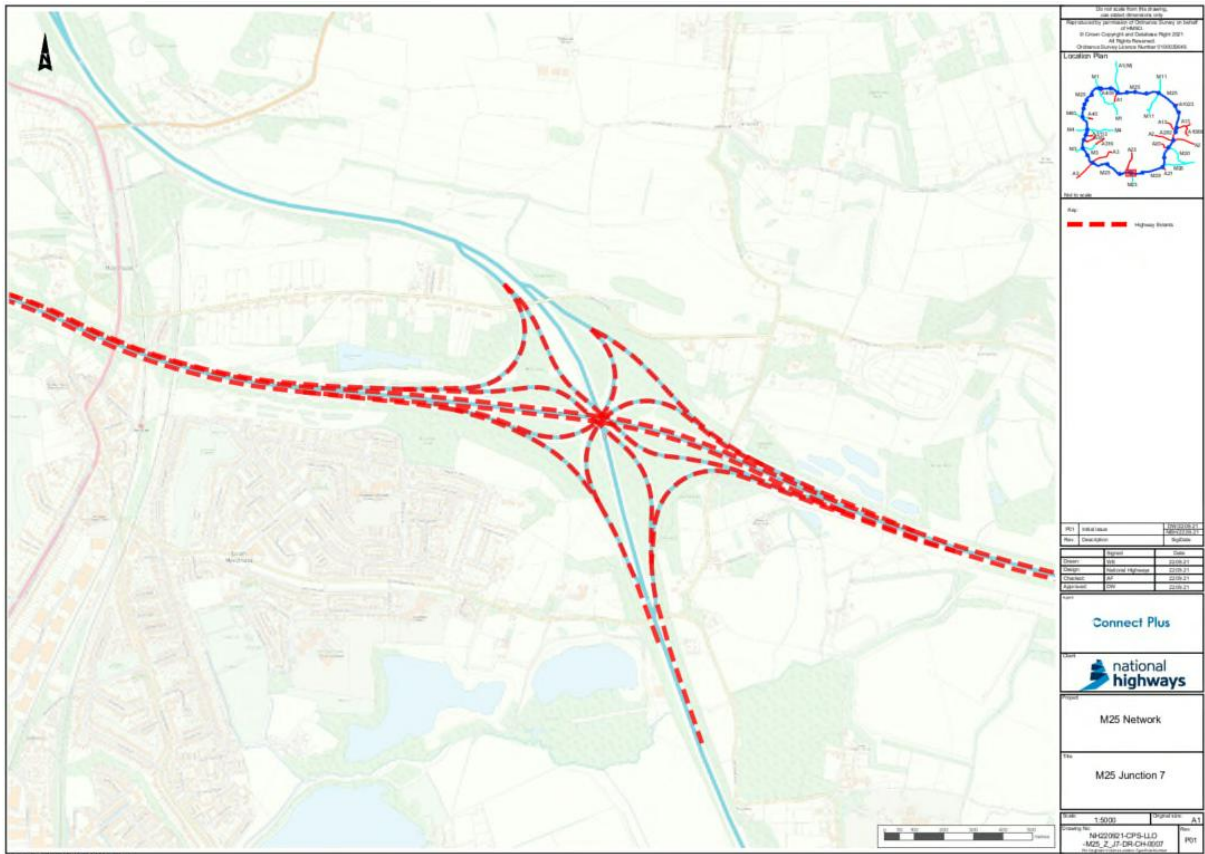
BY THE COURT

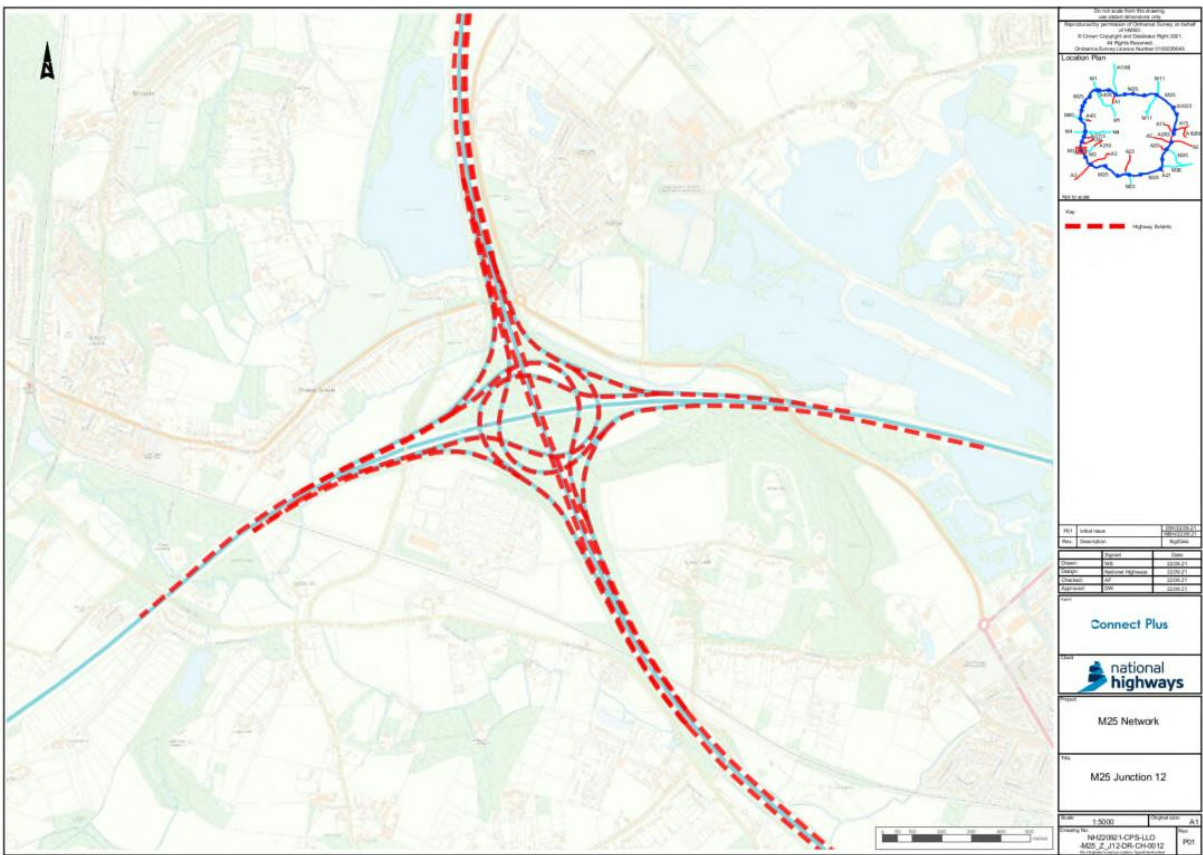
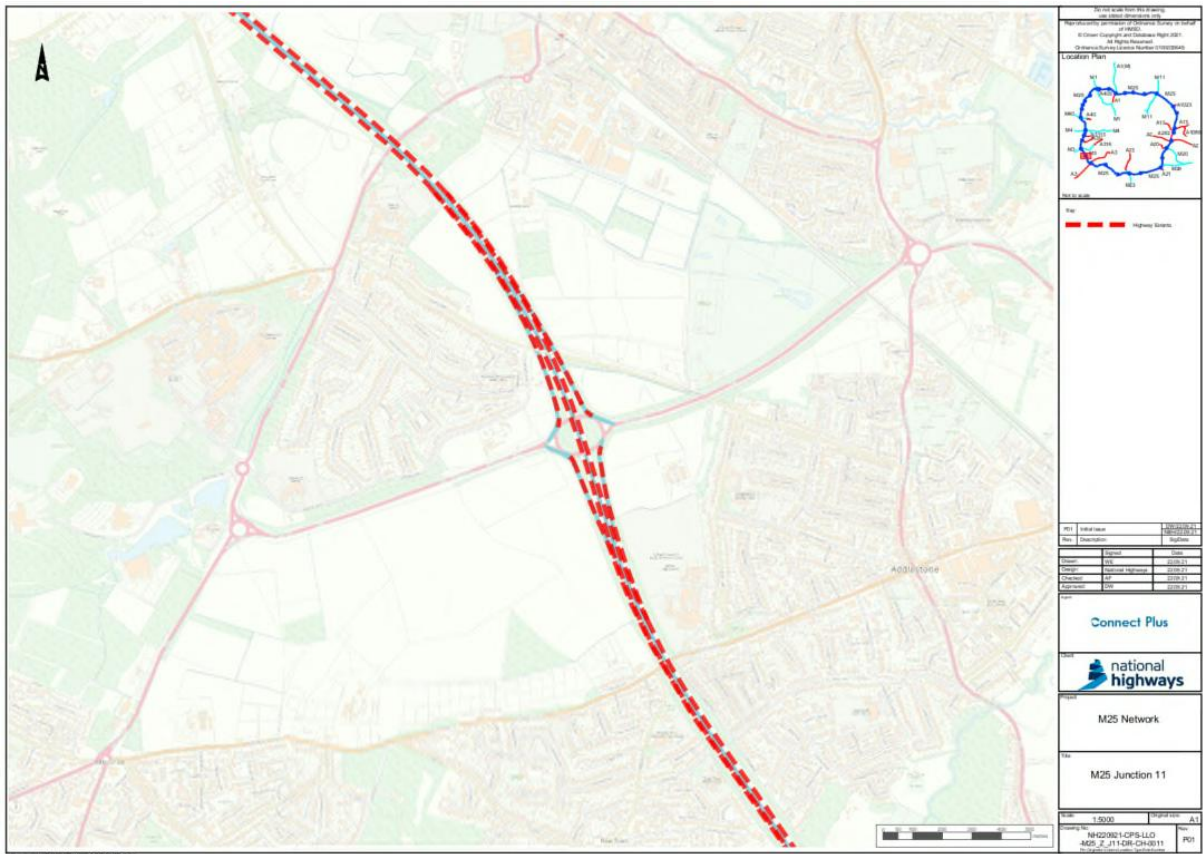
APPENDIX 1



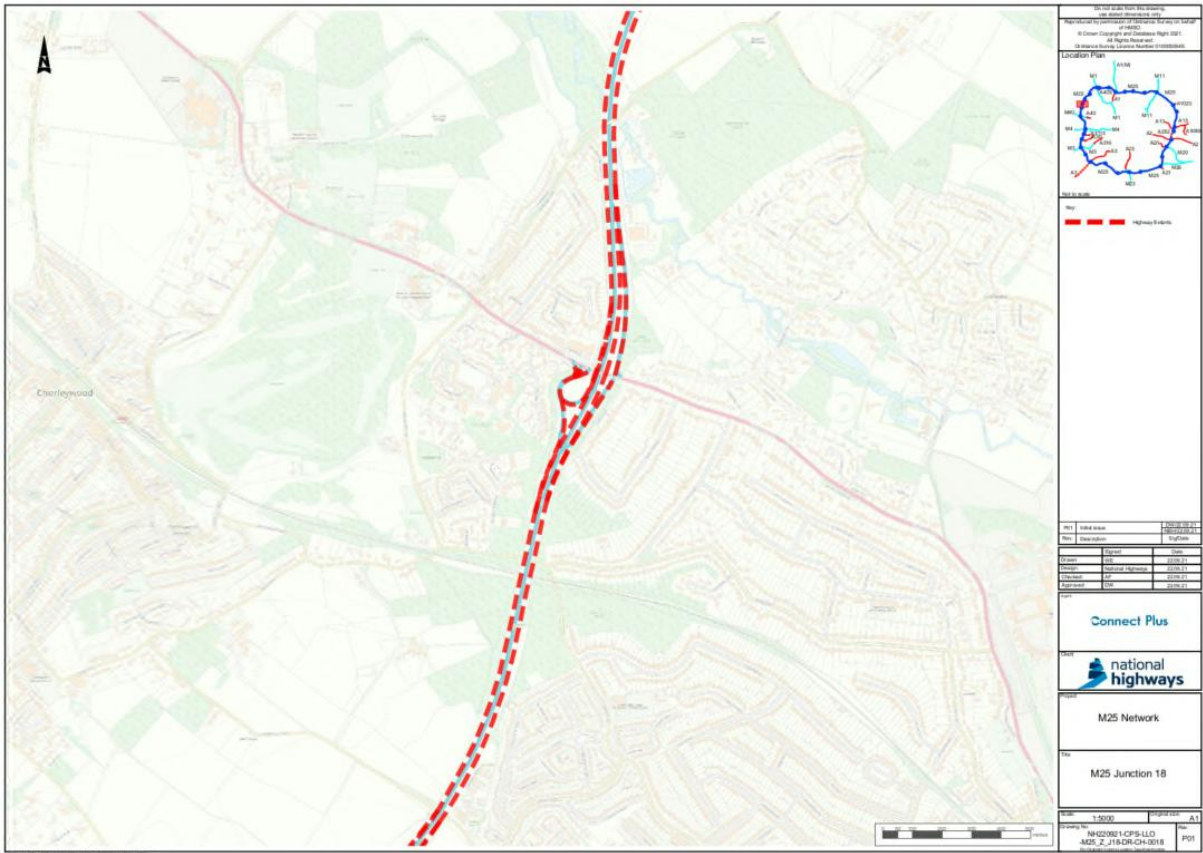
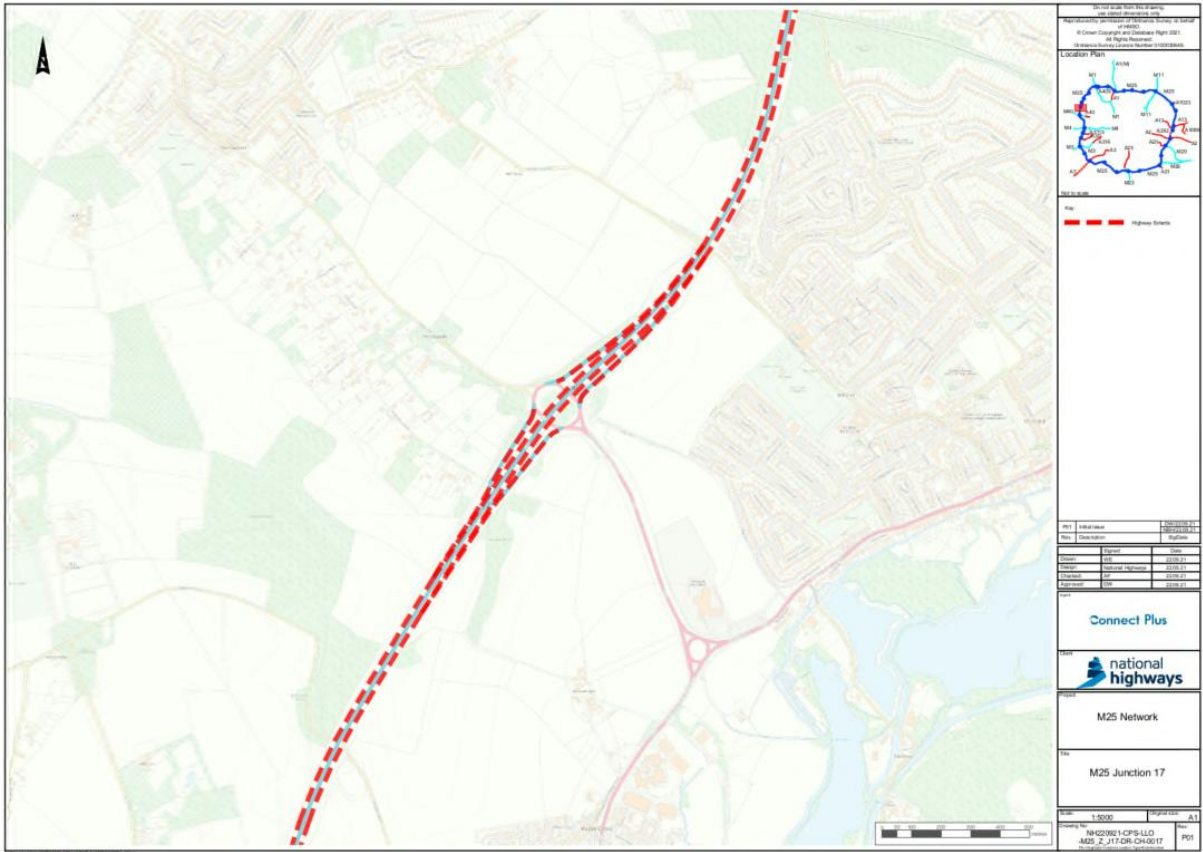


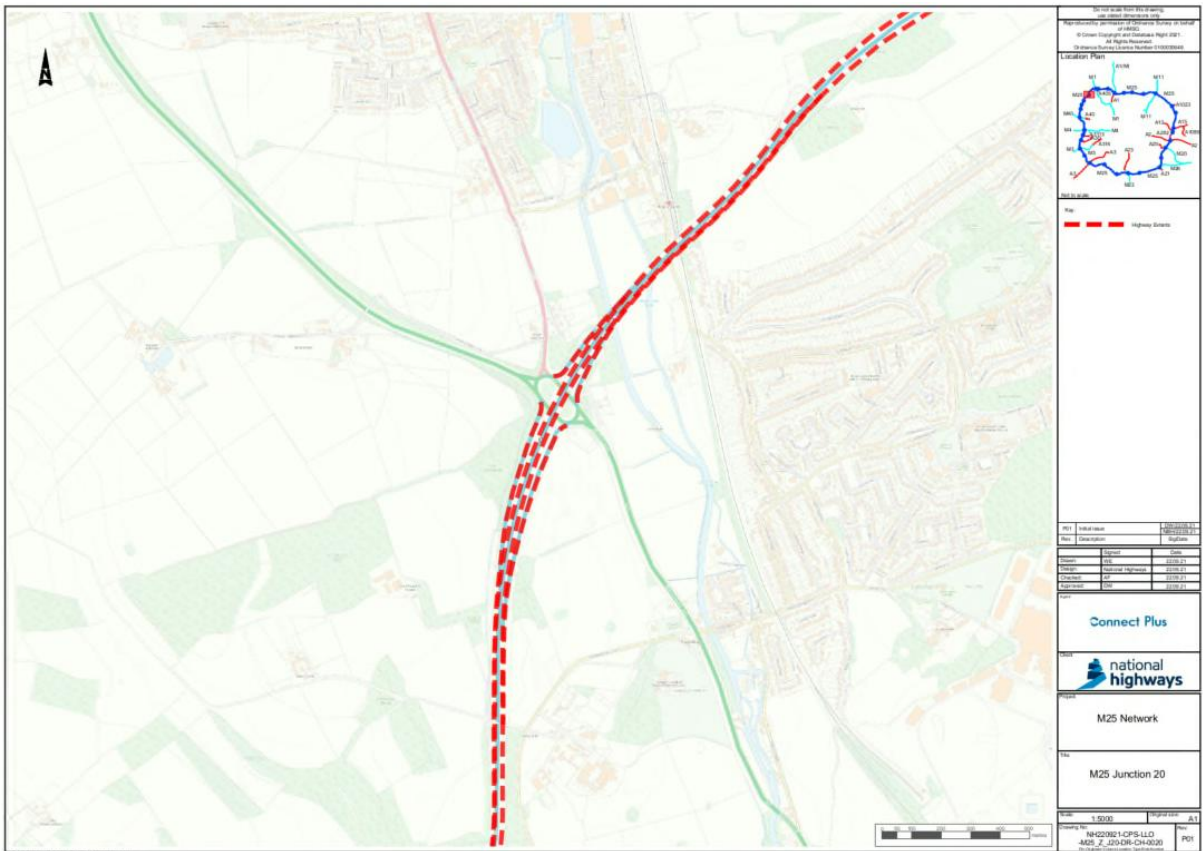
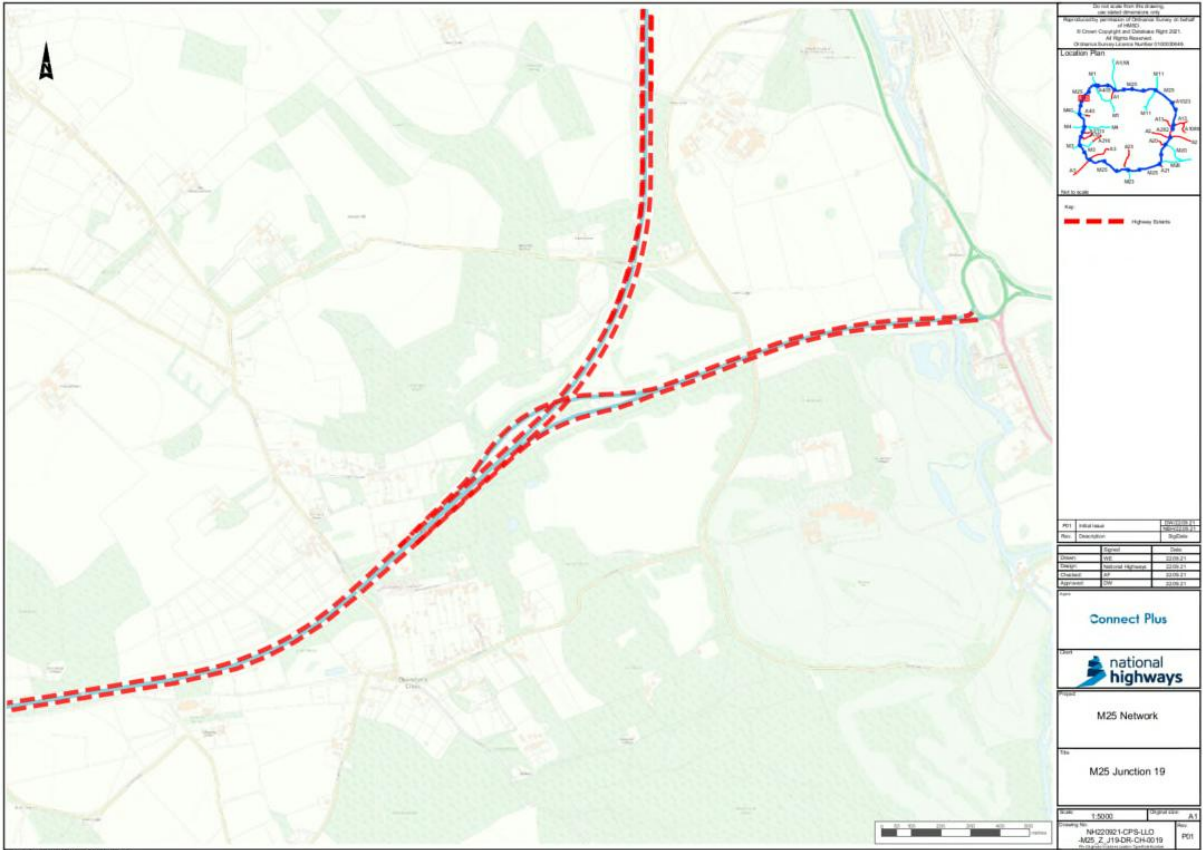


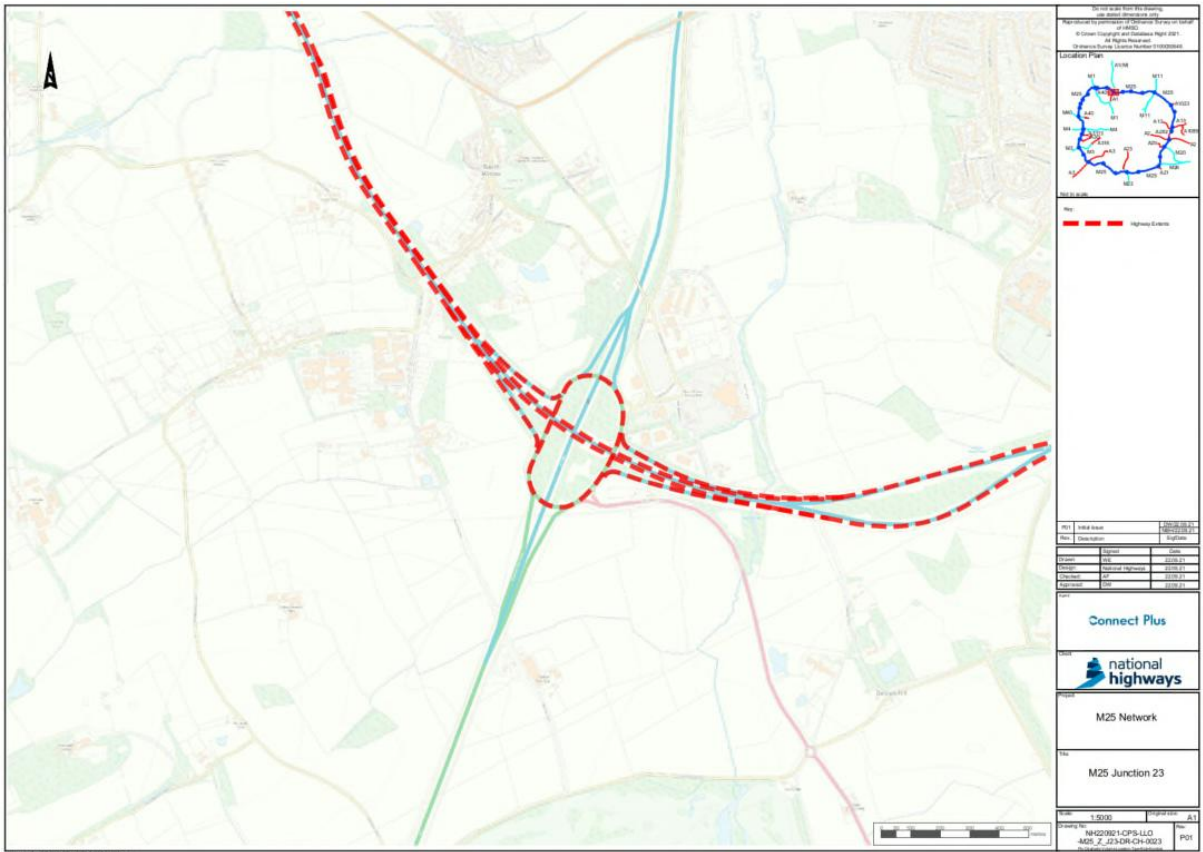


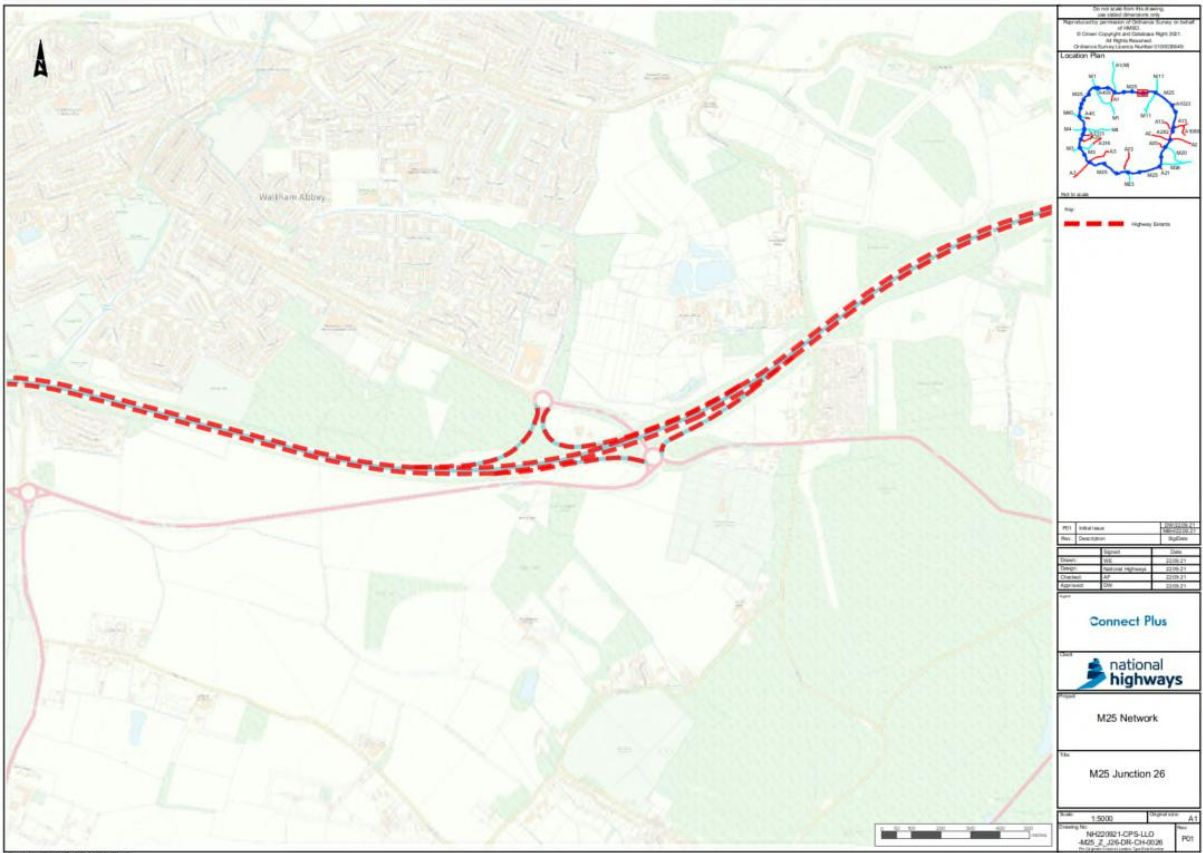
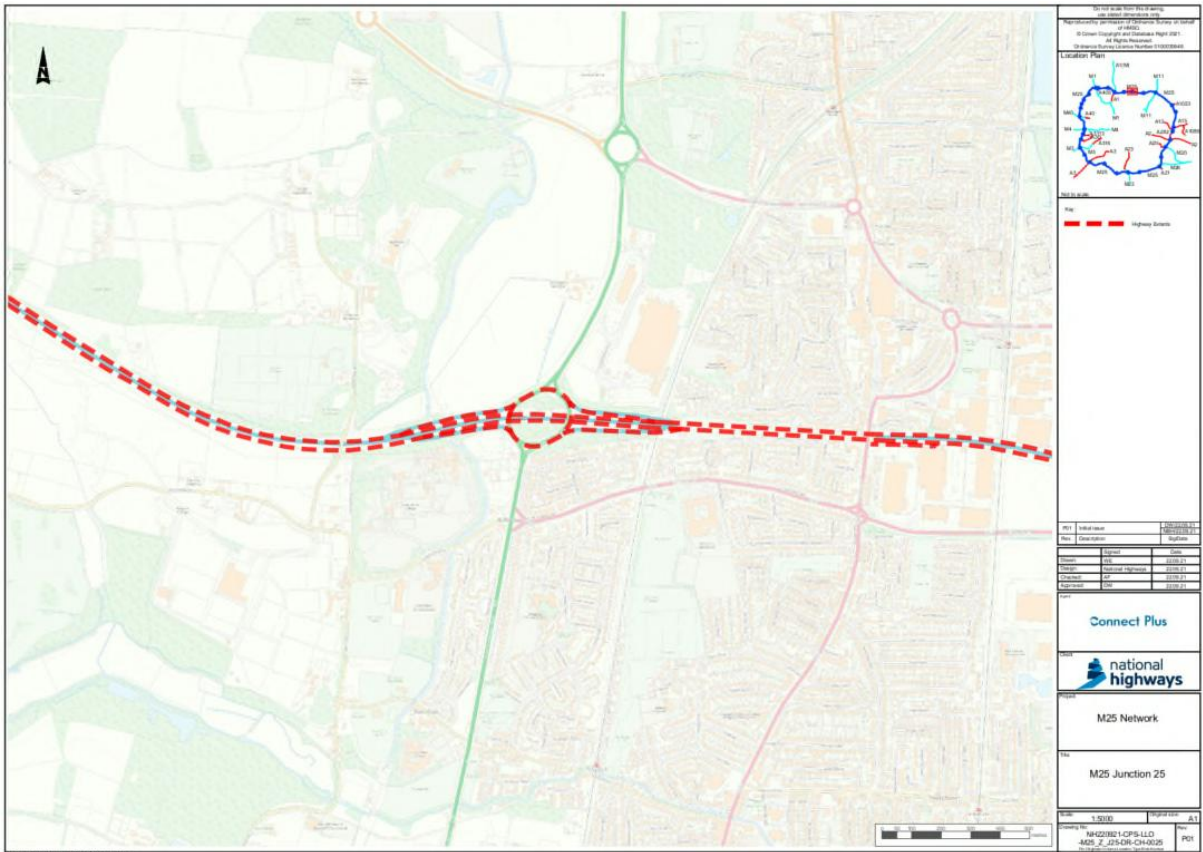


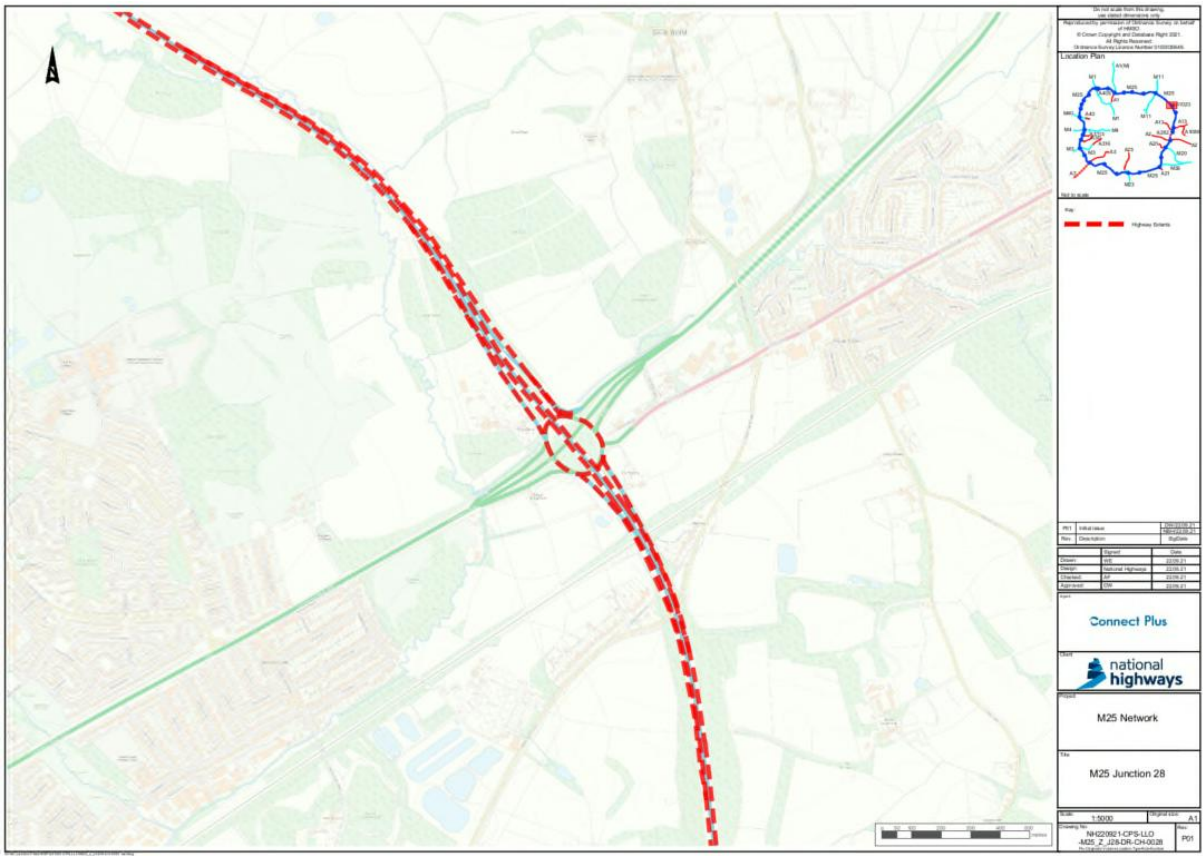
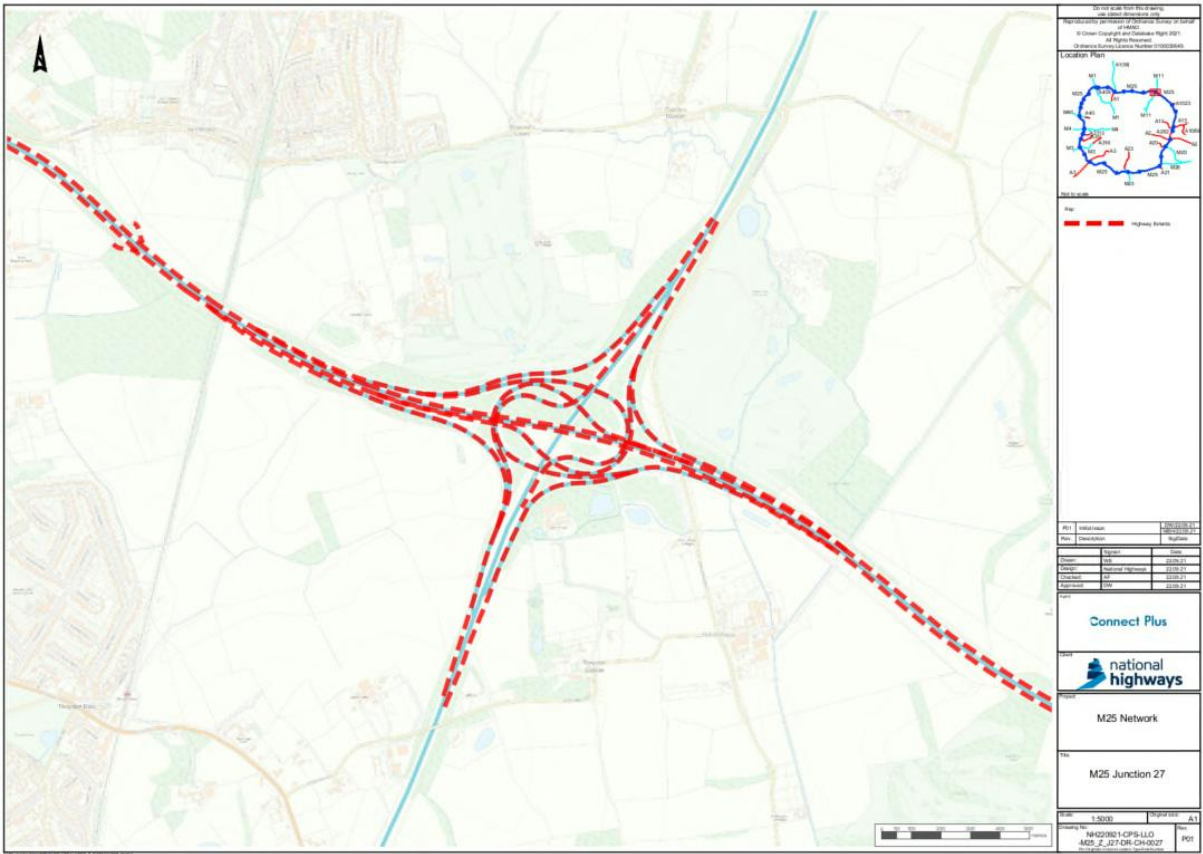


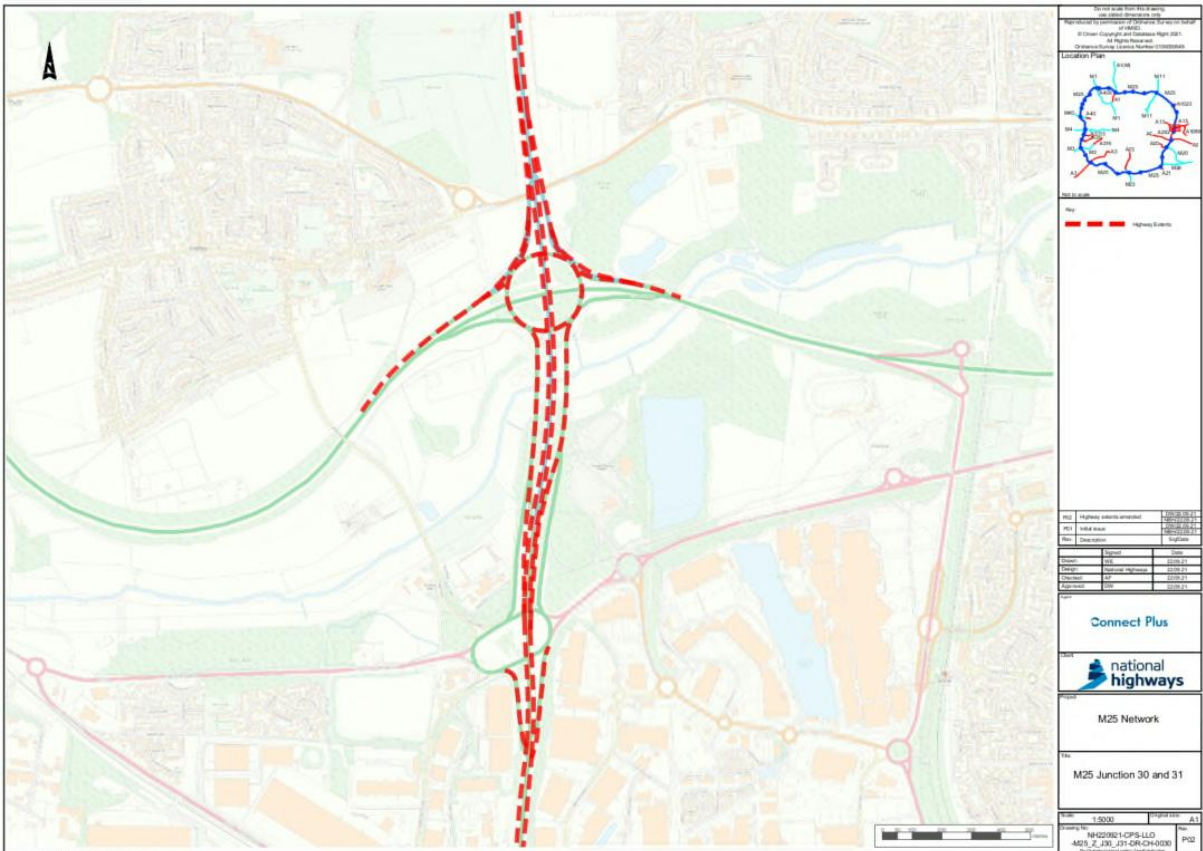
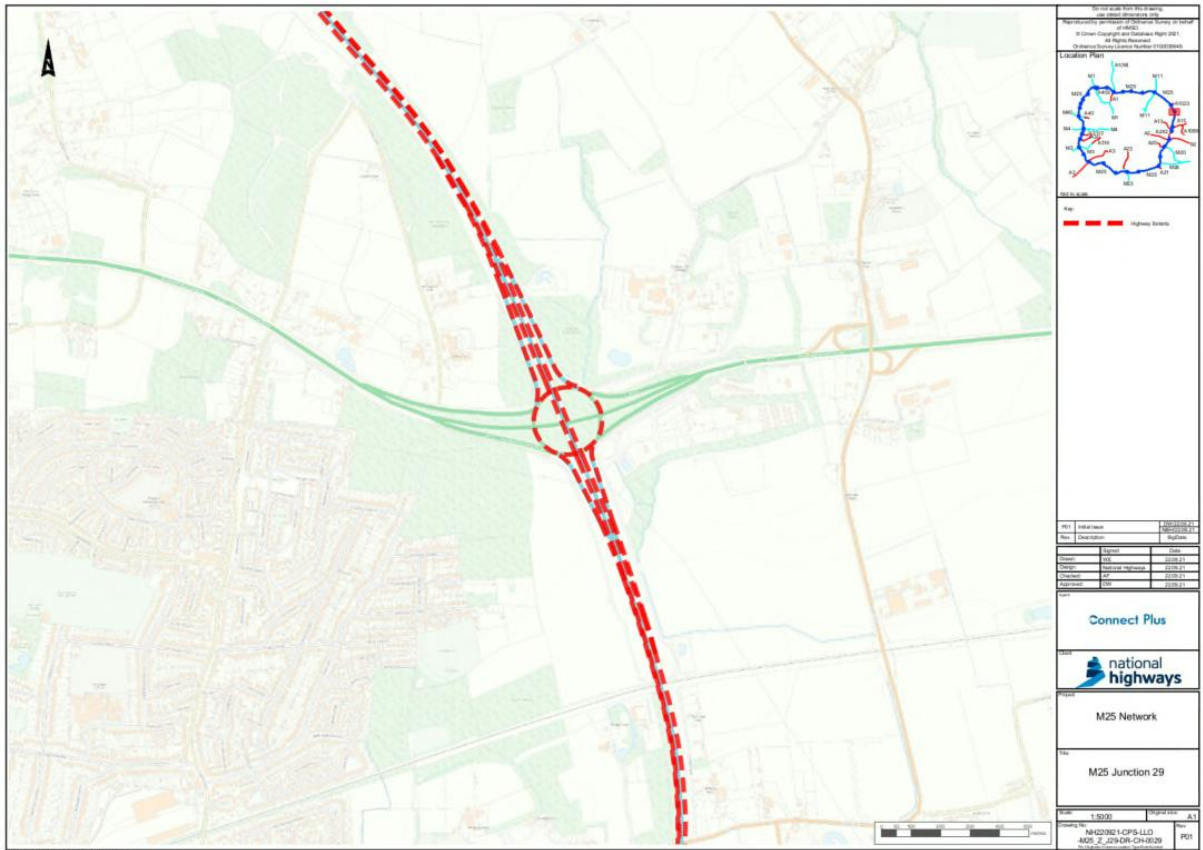






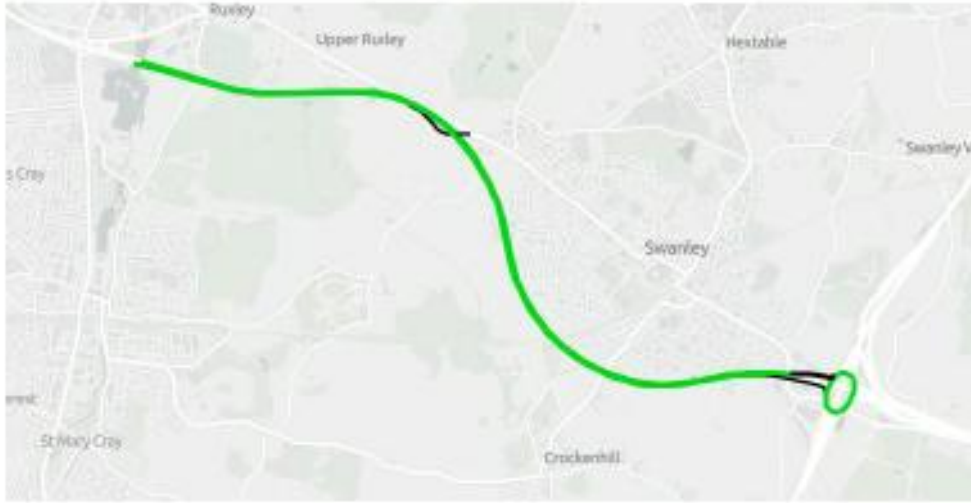




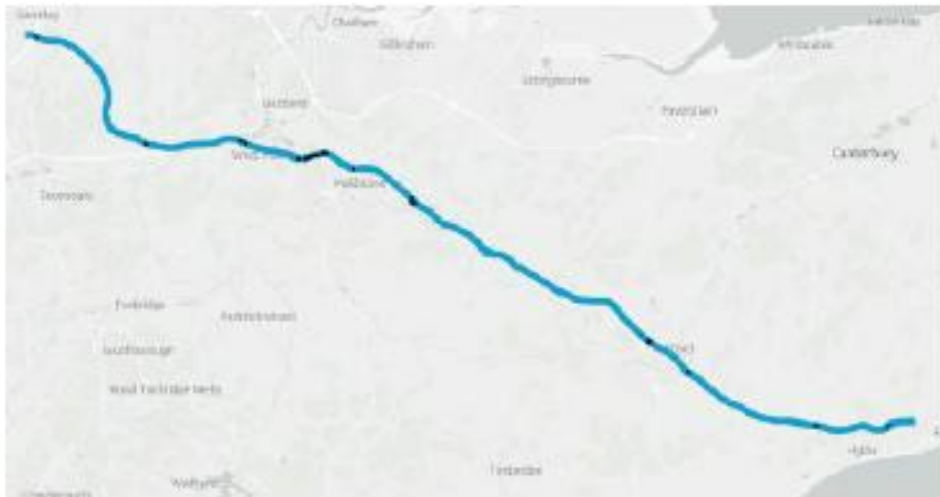


APPENDIX 2

A20 London - M25



M20



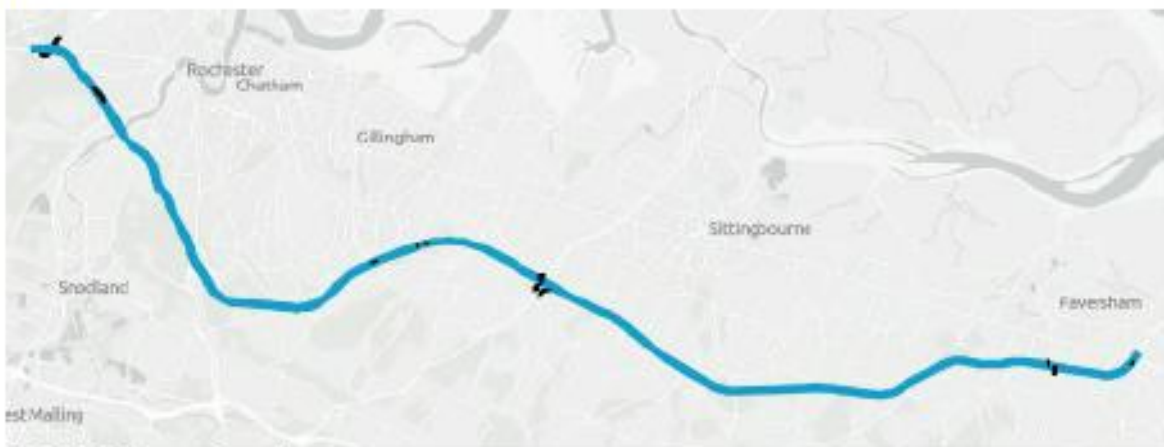
A20 Coast Section



A2 London – M2 Section



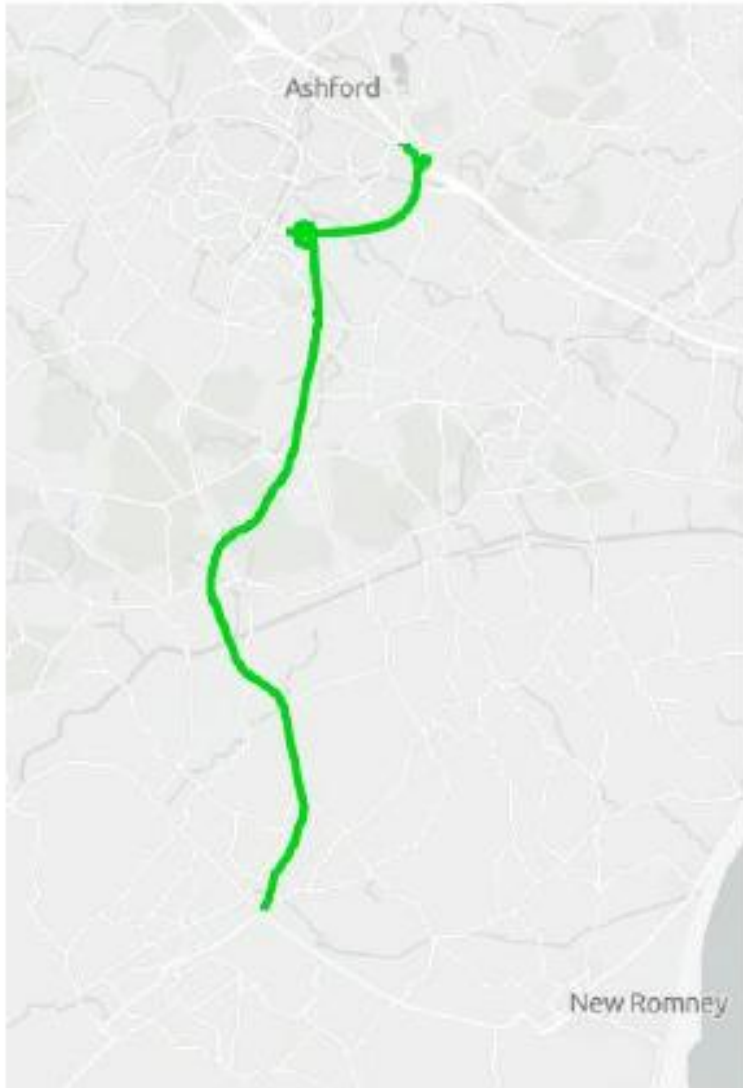
M2



A2 M2 - Dover Section



A2070

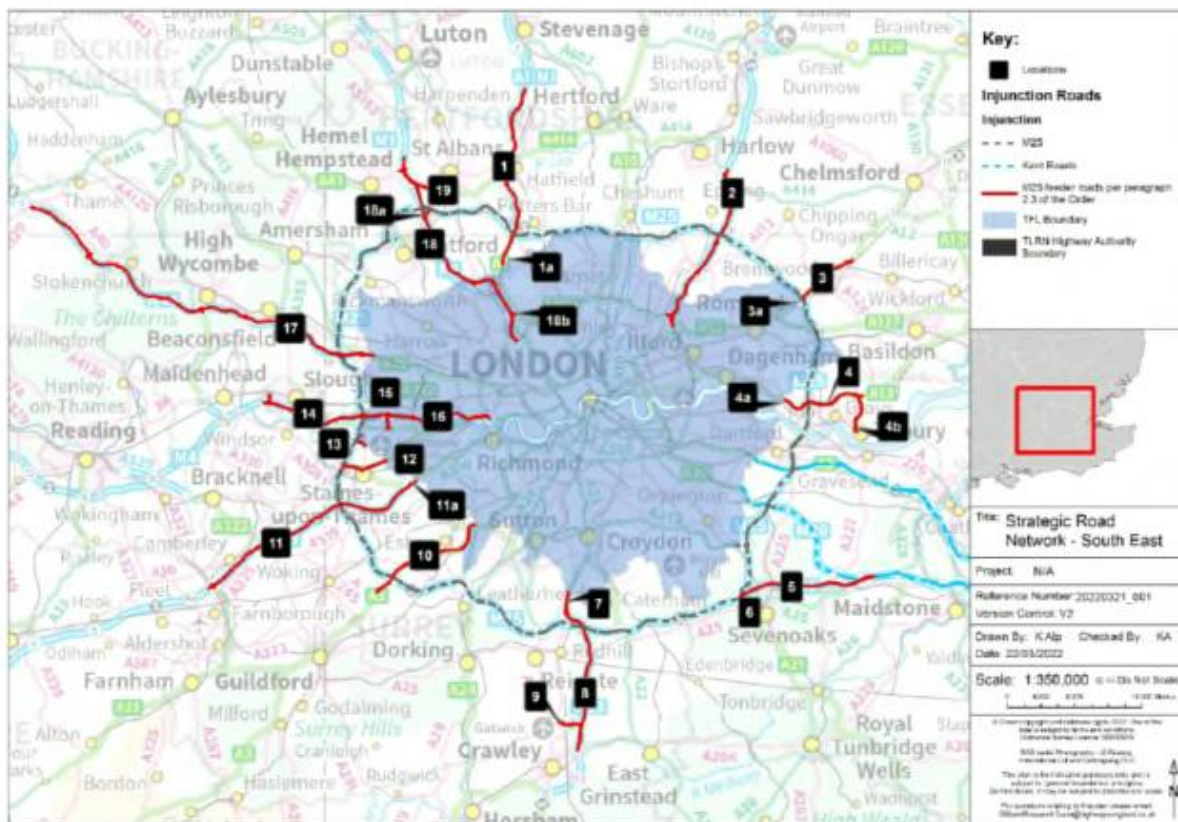


Kent & Surrounding areas SRN



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 Court order]

“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 CALL - Antony Nwanodi, Government Legal Department, Tel: 020 7210 3424”

[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 CALL - Antony Nwanodi, Government Legal Department, Tel: 020 7210 3424”

SCHEDULE 1 – NAMED DEFENDANTS

	Name	Address
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.	Alexander RODGER	[REDACTED]
3.	Alyson LEE	[REDACTED]
4.	Amy PRITCHARD	[REDACTED]
5.	Ana HEYATAWIN	[REDACTED]
6.	Andrew Taylor WORSLEY	[REDACTED]
7.	Anne TAYLOR	[REDACTED]
8.	Anthony WHITEHOUSE	[REDACTED]
9.	Barry MITCHELL	[REDACTED]
10.	Ben TAYLOR	[REDACTED]
11.	Benjamin BUSE	[REDACTED]
12.	Biff William Courtenay WHIPSTER	[REDACTED]
13.	Cameron FORD	[REDACTED]
14.	Catherine RENNIE- NASH	[REDACTED]
15.	Catherine EASTBURN	[REDACTED]
16.	Christian MURRAY- LESLIE	[REDACTED]

17.	Christian ROWE	[REDACTED]
18.	Cordelia ROWLATT	[REDACTED]
19.	Daniel Lee Charles SARGISON	[REDACTED]
20.	Daniel SHAW	[REDACTED]
21.	David CRAWFORD	[REDACTED]
22.	David JONES	[REDACTED]
23.	David NIXON	[REDACTED]
24.	David SQUIRE	[REDACTED]
25.	Diana Elizabeth BLIGH	[REDACTED]
26.	Diana HEKT	[REDACTED]
27.	Diana Lewen WARNER	[REDACTED]
28.	Donald BELL	[REDACTED]
29.	Edward Leonard HERBERT	[REDACTED]
30.	Elizabeth ROSSER	[REDACTED] [REDACTED]
31.	Emma Joanne SMART	[REDACTED]
32.	Gabriella DITTON	[REDACTED] [REDACTED]
33.	Gregory FREY	[REDACTED]
34.	Gwen HARRISON	[REDACTED]

35.	Harry BARLOW	[REDACTED]
36.	Ian BATES	[REDACTED]
37.	Ian Duncan WEBB	[REDACTED]
38.	James BRADBURY	[REDACTED]
39.	James Malcolm Scott SARGISON	[REDACTED]
40.	James THOMAS	[REDACTED]
41.	Janet BROWN	[REDACTED]
42.	Janine EAGLING	[REDACTED]
43.	Jerrard Mark LATIMER	[REDACTED] [REDACTED] [REDACTED]
44.	Jessica CAUSBY	[REDACTED]
45.	Jonathan Mark COLEMAN	[REDACTED]
46.	Joseph SHEPHERD	[REDACTED]
47.	Joshua SMITH	[REDACTED]
48.	Judith BRUCE	[REDACTED]
49.	Julia MERCER	[REDACTED]
50.	Julia SCHOFIELD	[REDACTED]
51.	Karen MATTHEWS	[REDACTED]
52.	Karen WILDIN	[REDACTED]

		<p>[REDACTED]</p> <p>[REDACTED]</p>
53.	Liam NORTON	<p>[REDACTED]</p> <p>[REDACTED]</p>
54.	Louis MCKECHNIE	<p>[REDACTED]</p> <p>[REDACTED]</p>
55.	Louise Charlotte LANCASTER	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p>
56.	Lucy CRAWFORD	<p>[REDACTED]</p>
57.	Mair BAIN	<p>[REDACTED]</p>
58.	Margaret MALOWSKA	<p>[REDACTED]</p>
59.	Marguerite DOWBLEDAY	<p>[REDACTED]</p>
60.	Maria LEE	<p>[REDACTED]</p>
61.	Martin John NEWELL	<p>[REDACTED]</p>
62.	Mary ADAMS	<p>[REDACTED]</p> <p>[REDACTED]</p>
63.	Matthew LUNNON	<p>[REDACTED]</p>
64.	Matthew TULLEY	<p>[REDACTED]</p> <p>[REDACTED]</p>
65.	Meredith WILLIAMS	<p>[REDACTED]</p>
66.	Michael BROWN	<p>[REDACTED]</p>
67.	Michael Anthony WILEY	<p>[REDACTED]</p>

68.	Michelle CHARLSWORTH	[REDACTED]
69.	Natalie Clare MORLEY	[REDACTED]
70.	Nathaniel SQUIRE	[REDACTED]
71.	Nicholas COOPER	[REDACTED]
72.	Nicholas ONLEY	[REDACTED]
73.	Nicholas TILL	[REDACTED]
74.	Oliver ROCK	[REDACTED]
75.	Paul COOPER	[REDACTED]
76.	Paul SHEEKY	[REDACTED]
77.	Peter BLENCOWE	[REDACTED]
78.	Peter MORGAN	[REDACTED]
79.	Phillipa CLARKE	[REDACTED]
80.	Priyadaka CONWAY	[REDACTED]
81.	Richard RAMSDEN	[REDACTED]
82.	Rob STUART	[REDACTED]
83.	Robin Andrew COLLETT	[REDACTED]
84.	Roman Andrzej PALUCH-MACHNIK	[REDACTED]
85.	Rosemary WEBSTER	[REDACTED]

86.	Rowan TILLY	[REDACTED]
87.	Ruth Ann COOK	[REDACTED]
88.	Ruth JARMAN	[REDACTED]
89.	Sarah HIRONS	[REDACTED]
90.	Simon REDING	[REDACTED]
91.	Stefania MOROSI	[REDACTED]
92.	Stephanie AYLETT	[REDACTED]
93.	Stephen Charles GOWER	[REDACTED]
94.	Stephen PRITCHARD	[REDACTED]
95.	Susan CHAMBERS	[REDACTED]
96.	Sue PARFITT	[REDACTED]
97.	Sue SPENCER- LONGHURST	[REDACTED]
98.	Susan HAGLEY	[REDACTED]
99.	Suzie WEBB	[REDACTED]
100.	Tessa-Marie BURNS	[REDACTED]
101.	Theresa NORTON	[REDACTED]
102.	Tim SPEERS	[REDACTED]
103.	Tim William HEWES	[REDACTED]

104.	Tracey MALLAGHAN	[REDACTED]
105.	Valerie SAUNDERS	[REDACTED]
106.	Venitia CARTER	[REDACTED]
107.	Victoria Anne LINDSELL	[REDACTED]
108.	Xavier GONZALEZ TRIMMER	[REDACTED]
109.	Bethany MOGIE	[REDACTED]
110.	Indigo RUMBELOW	[REDACTED]
111.	Adrian TEMPLE-BROWN	[REDACTED]
112.	Ben NEWMAN	[REDACTED]
113.	Christopher PARISH	[REDACTED]
114.	Elizabeth SMAIL	[REDACTED]
115.	Julian MAYNARD SMITH	[REDACTED]
116.	Rebecca LOCKYER	[REDACTED]
117.	Simon MILNER-EDWARDS	[REDACTED]
118.	Stephen BRETT	[REDACTED]
119.	Virginia MORRIS	[REDACTED]
120.	Andria EFTHIMIOUS-MORDAUNT	[REDACTED]

121.	Christopher FORD	[REDACTED]
122.	Darcy MITCHELL	[REDACTED]
123.	David MANN	[REDACTED]
124.	Ellie LITTEN	[REDACTED]
125.	Julie MACOLI	[REDACTED]
126.	Kai BARTLETT	[REDACTED]
127.	Sophie FRANKLIN	[REDACTED] [REDACTED]
128.	Tony HILL	[REDACTED]
129.	Nicholas BENTLEY	[REDACTED]
130.	Nicola STICKELLS	[REDACTED]
131.	Mary LIGHT	[REDACTED]
132.	David McKENNY	[REDACTED]
133.	Giovanna LEWIS	[REDACTED]
134.	Margaret REID	[REDACTED]

SCHEDULE 2

Claim Nos. QB-2021-003576, 003626 and 003737

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

**Before the Honourable Mr Justice Chamberlain
On 17 March 2022**

B E T W E E N:

NATIONAL HIGHWAYS LIMITED



-and-

- (1) PERSONS UNKNOWN CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE PREVENTING THE FREE FLOW OF TRAFFIC ONTO OR ALONG THE M25 MOTORWAY FOR THE PURPOSES OF PROTESTING**
- (2) PERSONS UNKNOWN CAUSING THE BLOCKING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE INTERFERING WITH THE FLOW OF TRAFFIC ONTO OR OFF OR ALONG THE A2, A20 AND 2070 TRUNK ROADS AND M2 AND M20 MOTORWAY FOR THE PURPOSE OF PROTESTING**
- (3) PERSONS UNKNOWN CAUSING THE BLOCKING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE INTERFERING WITH THE FLOW OF TRAFFIC ONTO OR OFF OR ALONG THE 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**
- (4) MR ALEXANDER RODGER AND 142 OTHERS**

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

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

FURTHER TO the Orders made in these proceedings by Lavender J on 22 September 2021 (the “**M25 Order**”), Cavanagh J on 24 September 2021 (the “**Kent Roads Order**”) and Holgate J on 4 October 2021 (the “**Feeder Roads Order**”)

AND UPON the Claimant’s application by Application Notice dated 4 March 2022, pursuant to the liberty to apply provisions at paragraph 7 of the M25 and Kent Roads Orders and paragraph 10 of the Feeder Roads Order to extend the duration of the injunctions contained at paragraph 2 of the M25 and Kent Roads Orders and paragraph 4 of the Feeder Roads Order (the “**Extension Application**”)

AND UPON READING the Witness Statement of Robert Shaw dated 4 March 2022, and the Claimant’s skeleton argument.

AND UPON hearing David Elvin QC, Counsel for the Claimant

AND UPON the Court accepting the Claimant’s undertaking that it will provide to the Defendants copies of further evidence or other documents filed in these proceedings upon request, following the Defendants or their representatives providing contact details to the Claimant’s solicitors

AND UPON the Court accepting the Claimant’s renewed undertaking that the Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss

AND UPON the Court accepting the Claimant’s renewed undertaking to identify and name Defendants and apply to add them as named Defendants to this Order as soon as reasonably practicable

AND UPON the Claimant confirming that this Order is not intended to prohibit lawful protest which does not endanger, slow, obstruct, prevent or otherwise interfere with the flow of traffic onto off or along the M25, Kent Roads or Feeder Roads nor to prevent lawful use of the Roads by any person

AND UPON the Claimant confirming that it will file summary judgment applications in respect of Claim Nos. QB-2021-003576, 003626 and 003737 as soon as reasonably practicable

AND UPON the Chief Constables for those forces listed in Schedule 2 to this order having consented to an order being made in the terms set out below

IT IS ORDERED THAT:

Continuation of the M25 Order

1. For the purposes of this Order, the

1.1 M25 means the London Orbital Motorway including but not limited to the verges, central reservation, on- and off-slip roads, overbridges and underbridges including the Dartford Crossing and Queen Elizabeth II Bridge, and any apparatus related to that motorway.

1.2 the Kent Roads mean the A2, A20, A2070, M2 and M20 as identified in the plans annexed at Annex A to this Order, including but not limited to the verges, central reservation, on- and off-slip roads, overbridges and underbridges and any apparatus related to that motorway;

1.3 the Feeder Roads mean the A1(M) (Junction 1 to Junction 6), M11 (Junction 4 to Junction 7), A12 (M25 Junction 28 to A12 Junction 12), A13 (M25 Junction 30 to A1089), 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), 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) and A414 (M1 Junction 8 to A405) as identified by the descriptions and plan annexed at Annex B to this Order, including but not limited to the verges, central reservation, on- and off-slip roads, overbridges and underbridges, including any roundabouts for access to and from the Feeder Roads, and any apparatus related to those roads.

(together the “**Roads**”).

Continuation of the M25 Order

2. The long-stop date of 21 March 2022 be deleted, and the injunction at paragraph 2 of the M25 Order as set out in full at paragraph 3 below shall continue until 9 May 2022 or further order.

Injunction in force – M25 Order

3. With immediate effect and until the earlier of (i) Trial; (ii) Further Order; or (iii) 23.59 pm on 9 May 2022, the Defendants and each of them are forbidden from:

3.1 Blocking, endangering, slowing down, preventing, or obstructing the free flow of traffic onto or along or off the M25 for the purposes of protesting.

3.2 Causing damage to the surface of or to any apparatus on or around the M25 including but not limited to painting, damaging by fire, or affixing any item or structure thereto.

3.3 Affixing themselves (“locking on”) to any other person or object on the M25.

3.4 Erecting any structure on the M25.

3.5 Tunnelling in the vicinity of the M25.

3.6 Entering onto the M25 unless in a motor vehicle.

3.7 Abandoning any vehicle or item on the M25 with the intention of causing an obstruction.

3.8 Refusing to leave the area of the M25 when asked to do so by a police constable, National Highways Traffic Officer or High Court Enforcement Officer.

3.9 Causing, assisting or encouraging any other person to do any act prohibited by paragraphs 3.1 – 3.8 above.

3.10 Continuing any act prohibited by paragraphs 3.1 – 3.9 above.

Continuation of the Kent Roads Order

4. The long-stop date of 24 March 2022 be deleted, and the injunction at paragraph 2 of the Kent Roads Order as set out in full at paragraph 5 below shall continue until 9 May 2022 or further order.

Injunction in force - Kent Roads Order

5. With immediate effect and until the earlier of (i) Trial; (ii) Further Order; or (iii) 23.59 pm on 9 May 2022, the Defendants and each of them are forbidden from:
 - 5.1 Blocking, slowing down, obstructing or otherwise interfering with the flow of traffic onto or along or off the Roads for the purpose of protesting.
 - 5.2 Blocking, slowing down, obstructing or otherwise interfering with access to or from the Roads, and on any adjacent roads, slip roads or roundabouts which are not vested in the Claimant, for the purpose of protesting.
 - 5.3 Causing damage to the surface of or to any apparatus on or around the Roads including but not limited to painting, damaging by fire, or affixing any item or structure thereto.
 - 5.4 Affixing themselves (“locking on”) to any other person or object on the Roads.
 - 5.5 Erecting any structure on the Roads.
 - 5.6 Tunnelling in the vicinity of the Roads.
 - 5.7 Entering onto the Roads unless in a motor vehicle.
 - 5.8 Abandoning any vehicle or item on the Roads with the intention of causing an obstruction.

5.9 Refusing to leave the area within 50m of the centre of the Roads when asked to do so by a police constable, National Highways Traffic Officer or High Court Enforcement Officer.

5.10 Causing, assisting or encouraging any other person to do any act prohibited by paragraphs 5.1 – 5.9 above.

5.11 Continuing any act prohibited by paragraphs 5.1 – 5.10 above.

Continuation of the Feeder Roads Order

6. The long-stop date of 24 March 2022 be deleted, and the injunction at paragraph 4 of the Feeder Roads Order as set out in full at paragraph 7 below shall continue 9 May 2022 or further order.

Injunction in force – Feeder Roads Order

7. With immediate effect and until the earlier of (i) Trial; (ii) Further Order; or (iii) 23.59 pm on 9 May 2022, the Defendants and each of them are forbidden from:

7.1 Blocking, slowing down, obstructing or otherwise interfering with the flow of traffic onto or along or off the Roads for the purpose of protesting.

7.2 Blocking, slowing down, obstructing or otherwise interfering with access to or from the Roads, and on any adjacent roads, slip roads or roundabouts which are not vested in the Claimant, for the purpose of protesting.

7.3 Causing damage to the surface of or to any apparatus on or around the Roads including but not limited to painting, damaging by fire, or affixing any item or structure thereto.

7.4 Affixing themselves (“locking on”) to any other person or object on the Roads.

7.5 Erecting any structure on the Roads.

7.6 Tunnelling in the vicinity of the Roads.

7.7 Entering onto the Roads unless in a motor vehicle.

7.8 Abandoning any vehicle or item on the Roads with the intention of causing an obstruction.

7.9 Refusing to leave the area within 50m of the centre of the Roads when asked to do so by a police constable, National Highways Traffic Officer or High Court Enforcement Officer.

7.10 Causing, assisting or encouraging any other person to do any act prohibited by paragraphs 7.1 – 7.9 above.

7.11 Continuing any act prohibited by paragraphs 7.1 – 7.10 above.

Alternative Service

8. The Claimant is permitted in addition to personal service to serve this Order and other documents in these proceedings by the following three methods:

8.1 placing a copy of this Order on the National Highways website; and

8.2 sending a copy of this Order to Insulate Britain's email addresses: Insulate Britain ring2021@protonmail.com and insulatebritainlegal@protonmail.com; and

8.3 posting a copy of this Order together with covering letter through the letterbox of each Defendant (or leaving in a separate mailbox) with a notice affixed to the front door if necessary, drawing the recipient's attention to the fact the package contains a court order. If the premises do not have a letterbox, or mailbox, a package containing this Order may be affixed to the front door 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 Schedule 1; or

8.4 instead of by post as set out in paragraph 8.3 above, by email in circumstances where a Defendant has requested email service of documents.

9. Compliance with paragraph 8 shall constitute service of this Order.

Third-Party Disclosure

10. The disclosure obligations contained in the order of Thornton J dated 24 November 2021, as set out in full at paragraph 11 below, shall be extended to continue until 31 July 2022 or further order.
11. The Chief Constables for those forces listed in the Schedule to this order shall disclose to the Claimant:
 - 11.1 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 highway referred to in these proceedings; and
 - 11.2 all arrest notes, body camera footage and/or all other photographic material relating to possible breaches of the Orders.
12. The Claimant is to serve this order on the Police Representative Assistant Chief Constable Owen Weatherill (owen.weatherill@npocc.police.uk), by email only.

Further directions

13. 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 immediately (and in any event not less than 48 hours before the hearing of any such application).
14. Any person applying to vary or discharge this order must provide their full name and address, an address for service, and must also apply to be joined as a named defendant to the proceedings at the same time (to the extent they are not already so named).
15. The Claimant has permission to apply to extend or vary this Order or for further directions.
16. The Claimant is to file its application for summary judgment ("**the Application**") by 4pm on 25 March 2022.
17. The Claimant is to serve the Application and evidence in support thereof on the Defendants by 4pm on 5 April 2022.

18. Any Defendant wishing to file evidence in response to the Application is to file and serve such evidence in response by 4pm on 22 April 2022.
19. The Claimant and any Defendant wishing to file a Skeleton Argument are to file and serve a Skeleton Argument by 4pm on 27 April 2022.
20. The Application is listed for 4-5 May 2022 with a time estimate of 2 days, with 3 May 2022 set aside as a judicial reading day.
21. Costs reserved.

Communications with the Claimant

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

FAO Petra Billing/ Rob Shaw (petra.billing@dlapiper.com / rob.shaw@dlapiper.com)

DLA Piper UK LLP
1 St Paul's Place
Sheffield
S1 2JX

Reference – RXS/366530/107

BY THE COURT

Dated: 18 March 2022

SCHEDULE 3

CHIEF CONSTABLES OF THE FORCES OF:

City of London Police

Metropolitan Police Service

Avon and Somerset Constabulary

Bedfordshire Police

Cambridgeshire Constabulary

Cheshire Constabulary

Cleveland Police

Cumbria Constabulary

Derbyshire Constabulary

Devon & Cornwall Police

Dorset Police

Durham Constabulary

Essex Police

Gloucestershire Constabulary

Greater Manchester Police

Hampshire Constabulary

Hertfordshire Constabulary

Humberside Police

Kent Police

Lancashire Constabulary

Leicestershire Police

Lincolnshire Police

Merseyside Police

Norfolk Constabulary
North Yorkshire Police
Northamptonshire Police
Northumbria Police
Nottinghamshire Police
South Yorkshire Police
Staffordshire Police
Suffolk Constabulary
Surrey Police
Sussex Police
Thames Valley Police
Warwickshire Police
West Mercia Police
West Midlands Police
West Yorkshire Police
Wiltshire Police

SCHEDULE 4

Email addresses of further linked protestor organisations

Extinction Rebellion UK

- (i) enquiries@extinctionrebellion.uk
- (ii) press@extinctionrebellion.uk
- (iii) xrvideo@protonmail.com
- (iv) xr-action@protonmail.com
- (v) xraffinitysupport@protonmail.com
- (vi) xr-arrestwelfare@protonmail.com
- (vii) artsxr@gmail.com
- (viii) xr-CitizensAssembly@protonmail.com
- (ix) xr.connectingcommunities@gmail.com
- (x) xrdemocracy@protonmail.com
- (xi) xrnotables@gmail.com
- (xii) integration@rebellion.earth
- (xiii) xr-international@protonmail.com
- (xiv) xr-legal@riseup.net
- (xv) press@extinctionrebellion.uk
- (xvi) xr-newsletter@protonmail.com
- (xvii) xr-peoplesassembly@protonmail.com
- (xviii) xrpoliceliason@protonmail.com
- (xix) rebelringers@rebellion.earth
- (xx) xr.regenerativeculture@gmail.com
- (xxi) xr-regionaldevelopment@protonmail.com
- (xxii) RelationshipsXRUK@protonmail.com

- (xxiii) xr.mandates@gmail.com
- (xxiv) socialmedia@extinctionrebellion.uk
- (xxv) xrsocialmediaevents@gmail.com
- (xxvi) eventsxr@gmail.com
- (xxvii) xrbristol.regional@protonmail.com
- (xxviii) xrcymru@protonmail.com
- (xxix) xr.eastengland@protonmail.com
- (xxx) xrlondoncoord@gmail.com
- (xxxi) XRMidlands@protonmail.com
- (xxxii) xrne@protonmail.com
- (xxxiii) support@xrnorth.org
- (xxxiv) xrni@rebellion.earth
- (xxxv) xrscotland@gmail.com
- (xxxvi) XR-SouthEastRegionalTeam@protonmail.com
- (xxxvii) xr.regional.sw@protonmail.com
- (xxxviii) talksandtraining.xrbristol@protonmail.com
- (xxxix) xrcymrutalksandtraining@gmail.com
- (xl) eoexrtnt@protonmail.com
- (xli) xrlondoncommunityevents@gmail.com
- (xlii) xrmidlandstraining@protonmail.com
- (xliii) XRNE.training@protonmail.com
- (xliv) xrnw.training@gmail.com
- (xlv) xryorkshire.training@gmail.com
- (xlvi) xrni.tt@rebellion.earth
- (xlvii) talksandtrainings.scotland@extinctionrebellion.uk
- (xlviii) xrtse@gmail.com

(xlix) xrsw.trainings@gmail.com

Just Stop Oil

(l) Ring2021@protonmail.com

(li) juststopoil@protonmail.com

Youth Climate Swarm

(lii) youthclimateswarm@protonmail.com

Insulate Britain

(liii) Ring2021@protonmail.com

(liv) iblegal@protonmail.com

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

BEFORE: MR JUSTICE BENNATHAN

Claim No: QB-2021-003576, QB-2021-003626, QB-2021-003737

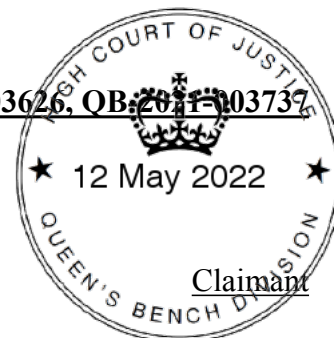
B E T W E E N:

NATIONAL HIGHWAYS LIMITED

-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) MR ALEXANDER RODGER AND 132 OTHERS**

Defendants



JUDGMENT ORDER

UPON the application of the Claimant for summary judgment (“the Application”)

AND UPON Mr Justice Chamberlain making an Order dated 17 March 2022 (“Extension Order”)

AND UPON hearing Myriam Stacey QC, Admas Habteslasie and Michael Fry for the Claimant, and Owen Greenhall for Jessica Branch being a person who is not a party to the proceedings but who was permitted to make representations pursuant to CPR r. 40.9.

AND UPON the Court making a separate Order dated 12 May 2022 (“Injunction Order”) in respect of interim and final injunctive relief.

IT IS ORDERED:

Definitions

1. In this Order, the following definitions shall have effect:
 - 1.1. “Dismissal Defendants” means Tam Millar; Hannah Shafer; Jesse Long; Thomas Franke; William Wright; Arne Springorum; Ben Horton; Emily Brocklebank; Marc Savitsky; and Serena Schellenberg
 - 1.2. “Contemnor Defendants” means Ana Heyatawin (D5); Ben Taylor (D10); Benjamin Buse (D11); Biff Whipster (D12); Christian Rowe (D17); David Nixon (D23); Diana Warner (D27); Ellie Litten (D124); Emma Smart (D31); Gabriella Ditton (D32); Indigo Rumbelow (D110); James Thomas (D40); Louis McKechnie (D54); Oliver Rock (D74); Paul Sheeky (D76); Richard Ramsden (D81); Roman Paluch-Machnik (D84); Ruth Jarman (D88); Stephanie Aylett (D92); Stephen Gower (D93); Stephen Pritchard (D94); Sue Parfitt (D96); Theresa Norton (D101); and Tim Speers (D102)
 - 1.3. “109 Defendants” means all the remaining named defendants excluding the Dismissal and Contemnor Defendants.

Management of Proceedings

2. The Extension Order at paragraph 14 is varied as it conflicts with CPR r 40.9. Pursuant to r 40.9 Ms Jessica Branch is directly affected by the proposed order and has permission to seek to vary the proposed order.

Disposal

3. The Application is dismissed as against the Dismissal Defendants and the 109 Defendants.

4. Summary judgment on the Application in favour of the Claimant is granted in respect of the Contemnor Defendants.
5. Injunctive relief in the form of interim and final injunctions is granted, as set out in the Injunction Order dated 12 May 2022.
6. The Claimant's application for alternative service of the Injunction Order is refused in respect of the First Defendant, and granted in respect of the Contemnor Defendants and 109 Defendants.
7. The Claimant's application for disclosure orders in respect of the police is granted as provided for in the Injunction Order.
8. The Claimant's application for declaratory relief is refused.

Costs

9. Costs reserved.
10. Any submissions on costs by any party are to be filed and served on the Claimant, Ms Branch, and the Court by 4pm on Monday 16 May 2022.

Permission to Appeal

11. The Claimant's application (made by email to Mr Justice Bennathan's clerk dated 11 May 2022 timed at 17:51) for permission to appeal is refused.
12. If so advised, time to file any further application for permission to appeal is to run from Wednesday 11 May 2022 which is the date judgment in the Application was handed down.

Alternative Service of this Order

13. The Claimant is permitted to serve this Judgment Order on the Defendants by:
 - 13.1. Service of the sealed Order on Insulate Britain by email to their known email addresses insulatebritainlegal@protonmail.com and ring2021@protonmail.com; and
 - 13.2. Placing copies of the Order on the National Highways website.
14. This Judgment Order and any document relating to the hearing on 4 – 5 May 2022 (but not the Injunction Order) may be served on Ms Branch by providing a copy to her solicitors by email.

12 May 2022

BY THE COURT

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION



BEFORE: MR JUSTICE BENNATHAN

Claim No: QB-2021-003576, QB-2021-003626, QB-2021-003737

B E T W E E N:

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) MR ALEXANDER RODGER AND 132 OTHERS

Defendants

ORDER ON CLAIMANT'S COSTS APPLICATION

Upon receiving a written application for costs from the Claimant subsequent to the judgment delivered on 11 May 2022

IT IS ORDERED

- 1. The 24 Defendants against whom summary judgment was granted shall pay the Claimant's costs on the standard basis but not exceeding £4 360 for each Defendant, to be assessed if not agreed.**
- 2. Each of the 24 Defendants shall pay the Claimant £3 000 costs on account under CPR 42.2.8 by 4pm on Friday 20 January 2023.**
- 3. The "24 Defendants" in paragraphs 1 and 2 above, are those listed as "Contemnor Defendants" at paragraph 2 in the sealed order of 12 May 2022 in this claim.**
- 4. Costs in the cases of each of the 109 Defendants in respect of whom summary judgment was refused shall be in the case.**

5. The “109 Defendants” in paragraph 4, above, are those listed in Schedule 1 of the sealed order of 12 May 2022 numbers 2 to 134, except for the 24 Contemnor Defendants.

Dated 16 January 2023

Reasons

1. In May this year I gave judgment in the Claimant’s application for summary judgment and for injunctions, reported at [2022] EWHC 1105 (QB). Later the same month the Claimant submitted their application for costs. I regret that this application has only been brought to my attention in the past two weeks due to my being on circuit and a change of clerks. The facts of the original application and my decisions upon it are set out in my May judgment and I will not repeat them here but refer back as necessary.
2. The application sets out the Claimant’s total costs as £727 573.84, but proposes a reduced total costs figure of £600 000 to allow for the fact that I dismissed the summary judgment applications in 109 cases [May judgment paragraphs 35-36] and to allow for the fact the injunctions I granted included “persons unknown”. While I appreciate the motives behind that reduction, I do not regard it as a proper solution to the issues of the dismissed applications for summary judgment for reasons I will develop.
3. The application is for the costs expended by the Claimant both in the proceedings before me and for 3 earlier interim injunctions, granted by Lavender, Cavanagh, Holgate and JJ on 21 September, 24 September, and 2 October [all in 2021]. The order made in respect of costs on all 3 occasions was “*costs reserved*”.
4. At the time of my previous judgment there had been 3 sets of committal proceedings for breach of one or other of the 3 interim injunctions [May judgment paragraph 17]. Those sanctioned for breaching injunctions faced adverse costs orders based, in each of the 3 cases, on a summary assessment. I have assumed that the costs applications in those committal applications had no element to reflect the cost of obtaining the

various injunctions, both from the terms of the orders the Court made and because the very reputable Solicitors acting for the Claimant would have made that clear in this costs application, were that the case.

5. I have not received any submissions from the 133 named Defendants but as they have consistently taken no part, and expressed no interest, in this litigation that is neither unexpected nor any basis for my to refuse an order: They are entitled to take no part but cannot then complain about their voices being unheard on this application.
6. In their costs application the Claimant makes careful submissions as to why the order they seek does not interfere with any Defendant's Convention rights. For the reasons I set out before [May judgment paragraph 47] I accept those submissions in the case of the 24 Defendants against whom I gave summary judgment.
7. The argument advanced in respect of the 109 Defendants against whom I refused summary judgment is set out in the Claimant's application in the following terms [within their paragraph 7]:

Although the Court refused to make final orders as against the 109 Defendants, the Court was nevertheless similarly satisfied that there was a real and imminent threat of trespass and nuisance in respect of those 109 Defendants and made the interim injunction order in the same terms and for the same duration as the final injunctions against the Contemnor Defendants. In practice, therefore, the Claimant was also successful in securing effective injunctive relief and the same prohibitions against the 109 Defendants. Each of the 109 Defendants against whom such injunctive relief was secured were effectively served, were aware that they were Named Defendants, had the opportunity to take part in the proceedings to oppose the claim for a continuation of injunctive relief against them and chose not to do so

8. There are two problems with that approach to the 109 group:

(1) There was no suggestion by the Claimant in their application for an injunction that my grant of such an injunction against the 109 had to be founded on a finding that each of the 109, individually, were likely to commit tortious acts against the Claimant were I not to do so. My approach was whether there was a real danger that “the Defendants”, meaning *some* of the Defendants, and others unknown would violate the Claimant’s legitimate interests. If it were the case that an injunction in a protest case could only be granted where a Claimant could identify the risk of specified individuals acting tortiously, then the process of obtaining an injunction would become hugely complex, take many days of court time, and be even more expensive than is currently the case. I have not called for the Claimant to supply the terms of all their applications for injunctions before and after the case I heard, but I doubt very much that such applications specified the details of each of the named defendants and the evidential basis for fearing they would each act unlawfully, or [with *Canada Goose*, as in May judgment paragraph 41(3), in mind] in a lawful manner so as to infringe the Claimant’s rights.

(2) In any event, whether or not my approach in assessing future risk of tortious conduct was correct, the normal rule is that the costs of interim relief follow the outcome of the underlying claim, and I see no good reason to depart from that course in this case.

9. For those reasons I do not order any adverse costs order in the cases of the 109, but reserve their position as costs in case.

10. I turn to the amount that I should award against the 24. The total amount that the Claimant has expended is set out above. The two aspects that I need to consider are whether some reduction should be made for the “persons unknown” aspect of the injunction applications, and whether I should accept that the costs were properly incurred without further scrutiny.

11. The “persons unknown” aspect has to be a matter of broad assessment. The Claimant suggested a deduction of about 17% to allow for both the refused dismissal applications and the persons unknown. I think that is insufficient and I will instead

reduce the overall costs figure to allow for the persons unknown by 20%. Rounding down in the manner suggested by the Claimant, that gives a figure for named Defendants of £580 000. That figure divided by the 133 named Defendants comes to a very-slightly rounded figure of £4 360 per defendant.

12. In my view the very large total costs figure needs assessment. I do not belittle the hard work and care taken in advancing these applications, nor the need for the Claimant to act to keep the public road network open, but I also note that in the Divisional Court order consequent to the judgment in *NHL v Buse and others* [2021] EWHC 3404 (QB), there is the observation that *“The Court is not satisfied that the costs claimed are proportionate and that each item of costs has been reasonably incurred”*. The total costs I have been asked to award are, of course, much greater than in any of the three committal applications that had occurred at the time of my original decision [May judgment, paragraph 4].

13. The need for assessment, however, need not deprive the Claimant of any order as such a process is bound to approve of a significant part of the costs claimed. I therefore make an order that each of the 24 defendants should pay costs on account in the sum of £3 000 within approximately 4 weeks of this order, with detailed assessment of the remaining £1 360 per head if [as is likely] there is no agreement and the Claimant seeks to pursue that remnant.



TUESDAY 14 MARCH 2023



IN THE COURT OF APPEAL

ON APPEAL FROM KING'S BENCH DIVISION
QB-2021-003576

CA-2022-001066

BEFORE DAME VICTORIA SHARP PRESIDENT OF THE KING'S BENCH DIVISION
SIR JULIAN FLAUX, THE CHANCELLOR OF THE HIGH COURT
LORD JUSTICE LEWISON

B E T W E E N

NATIONAL HIGHWAYS LIMITED

CLAIMANT /
APPELLANT

ON PAPER

Application No.

CA-2022-001066

- 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. MR ALEXANDER RODGER AND 132 OTHERS

DEFENDANTS/
RESPONDENTS

UPON the Appellant's application for summary judgment and appeal against the Orders of the Mr Justice Bennathan dated respectively 9 May 2022 ("**the Injunction Order**") and 12 May 2022 ("**the Judgment Order**") which dismissed the Appellant's application for summary judgment against the First Respondents and 109 of the Second Respondents

AND UPON this Court having varied the Order of Bennathan J dated 9 May 2022 (the "**Injunction Order**") as set out in paragraph 2 of this Order and set aside the Order of Bennathan J dated 12 May 2022 (the "**Judgment Order**")

AND UPON the Appellant 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 5 of this Order

AND UPON hearing Leading and Junior Counsel for the Appellant and Mr Crawford and Mr Tulley, two of the named Respondents, in person

IT IS ORDERED THAT:-

1. The appeal is allowed.
2. Excepting paragraphs 5 to 8 and 17 thereof, the Injunction Order is set aside.
3. The “Named Defendants” are those Defendants with their numerical designations (e.g. D1, D2 etc.) whose names appear in the revised and re-numbered Schedule 1 annexed to this Order to reflect the Order made at paragraph 7.
4. The term “Defendants” refers to both “persons unknown” as defined as First Defendant in paragraph 6 of the Injunction Order and to the Named Defendants.
5. For the purposes of this Order, “the Roads” shall mean all of the following:
 - 5.1. The M25, meaning the London Orbital Motorway and shown in red on the plans at Appendix 1 annexed to this Order.
 - 5.2. 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.
 - 5.3. 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;

- 5.4. 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, lay-bys, police observation points/park up points, and emergency refuge areas.
6. From 10 June 2022 until 23.59 hrs on 9 May 2023 the Respondents and each of them are forbidden from:
 - 6.1. 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.
 - 6.2. 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.
 - 6.3. Entering on foot those parts of the Roads which are not authorised for access on foot, other than in cases of emergency.

Alternative service

7. The Appellant is permitted in addition to personal service to serve this Order on the Second Respondents and any other named defendants by the following methods together:
 - 7.1. service of the sealed Order on Insulate Britain by email to their known email addresses insulatebritainlegal@protonmail.com and ring2021@protonmail.com; and
 - 7.2. posting a copy of this Order through the letterbox of each named defendant (or leaving it in a separate mailbox) with a notice affixed to the front door if necessary, drawing the recipient's attention to the fact the package contains a Court Order. If the premises do not have a letterbox, or mailbox, a package containing this Order may be affixed to the front door 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.

8. The Appellant is directed to take the following steps to publicise the existence of this Order:
 - 8.1. Placing copies of the Order on the National Highways website;
 - 8.2. Advertising the existence of this Order in the London Gazette;
 - 8.3. Sending a copy of this Order to Insulate Britain's known email addresses: ring2021@protonmail.com and insulatebritainlegal@protonmail.com.

9. For the avoidance of doubt, persons who have not been served with this Order by an acceptable method are not bound by its terms. Compliance with paragraphs 7.1 and 8.1 – 8.3 above **does not constitute service** on any Defendant, nor does a failure to comply with paragraph 11 above constitute a failure of service.

Third-Party Disclosure

10. Pursuant to CPR 31.17, the Chief Constables for those forces listed in Schedule 3 to this Order shall procure that the officers within their forces disclose to the Appellant:

- 10.1. 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
- 10.2. 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 Appellant 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:
 - 11.1. 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;
 - 11.2. investigating, formulating, pleading and prosecuting any claim within these proceedings arising out of any alleged breach of this Order;
 - 11.3. 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. Until further Order, the postal address and/or address for service of any person who is added as a 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.
13. The Appellant is to serve this order on the Police Representative Assistant Chief Constable Owen Weatherill (owen.weatherill@npocc.police.uk), by email only.

Further directions

14. The Respondents 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 Appellant's solicitors by email to the addresses specified at paragraph 21 below 48 hours before making such application of the nature of such application and the basis for it.

15. 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.
16. The Appellant has liberty to apply to extend, vary or discharge this Order, or for further directions.

COSTS

17. There will be no variation of the costs Order dated 16 January 2023 of Bennathan J and no order as to costs of the appeal.

REASONS

1. The appeal was pursued by the Appellant essentially as being in the public interest. The Second Respondents did not formally oppose the appeal and although two of the 109 named defendants addressed the Court at the hearing, very little time was taken up by that presentation and it cannot have increased the Appellant's costs to any appreciable extent. The Court considers it would be unreasonable and disproportionate to order the Second Respondents to pay any of the costs of the appeal.
2. The Court sees no reason to vary the costs Order made by the judge. It will be for the High Court at any review hearing to determine what if any costs Order to make in the case.

COMMUNICATIONS WITH THE CLAIMANT

18. The Appellant's solicitors and their contact details are:

DLA Piper UK LLP

Attention: Petra Billing and Rob Shaw

1 St. Paul's Place

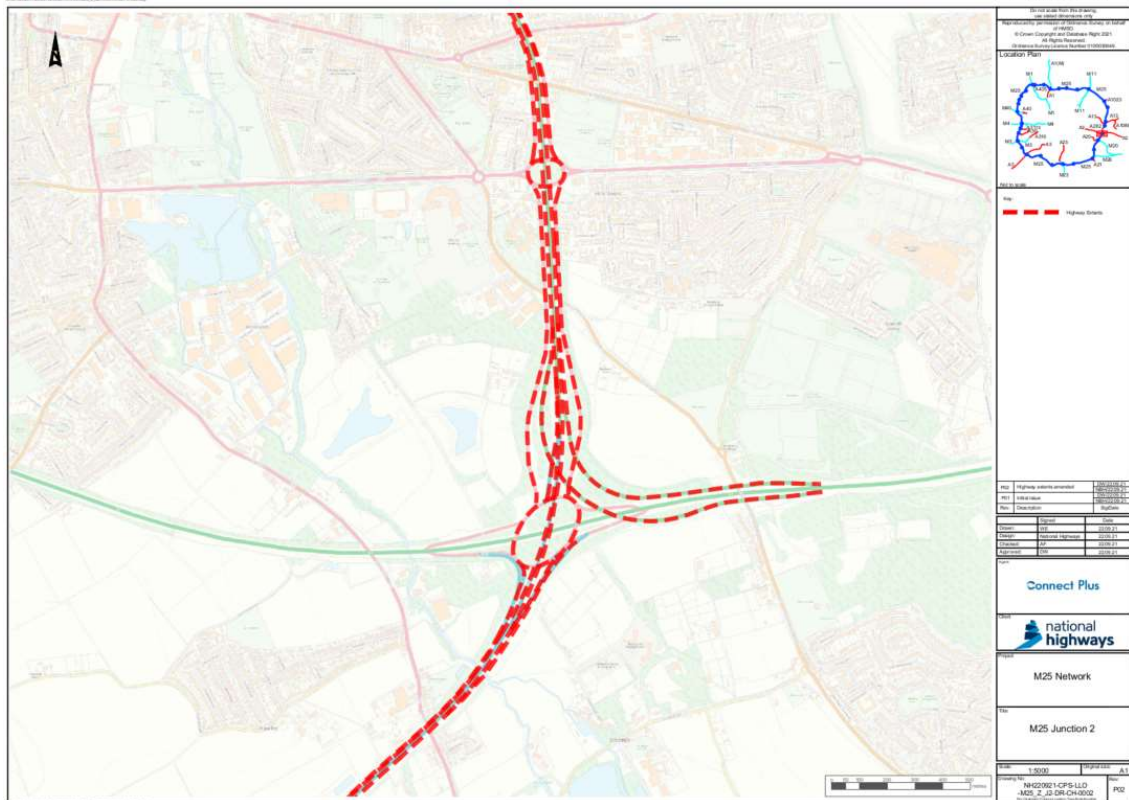
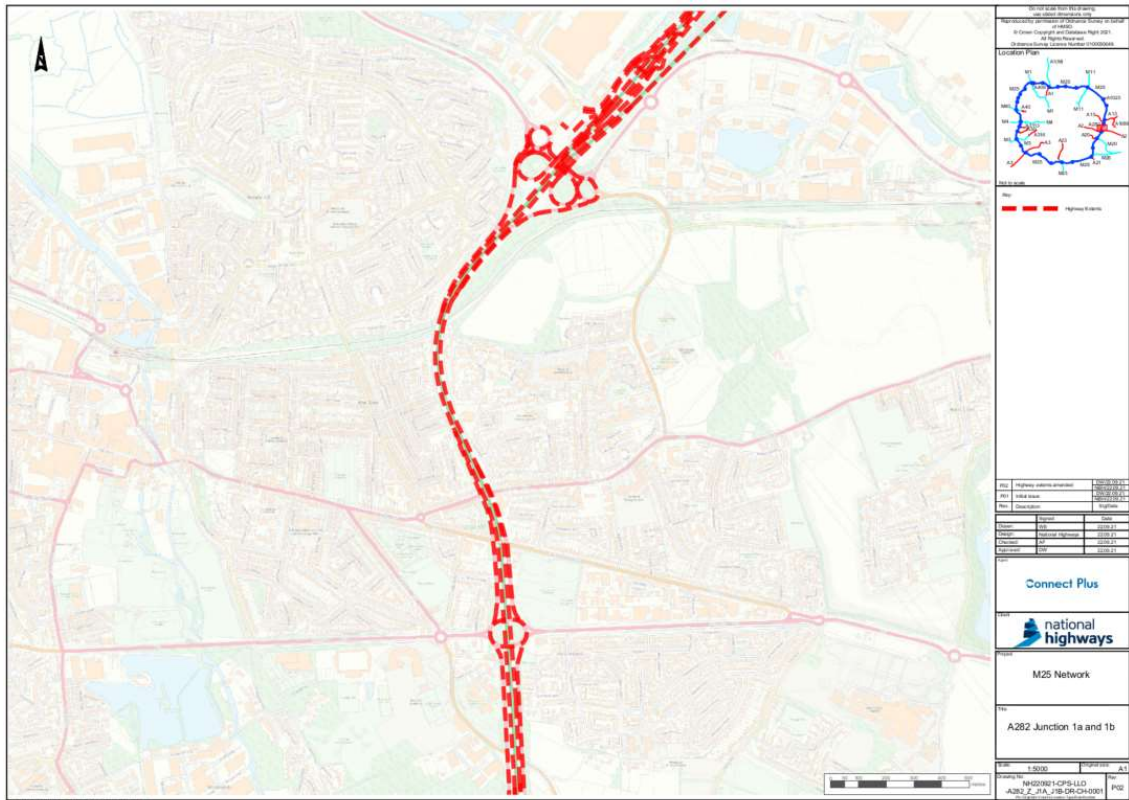
Sheffield S1 2JX

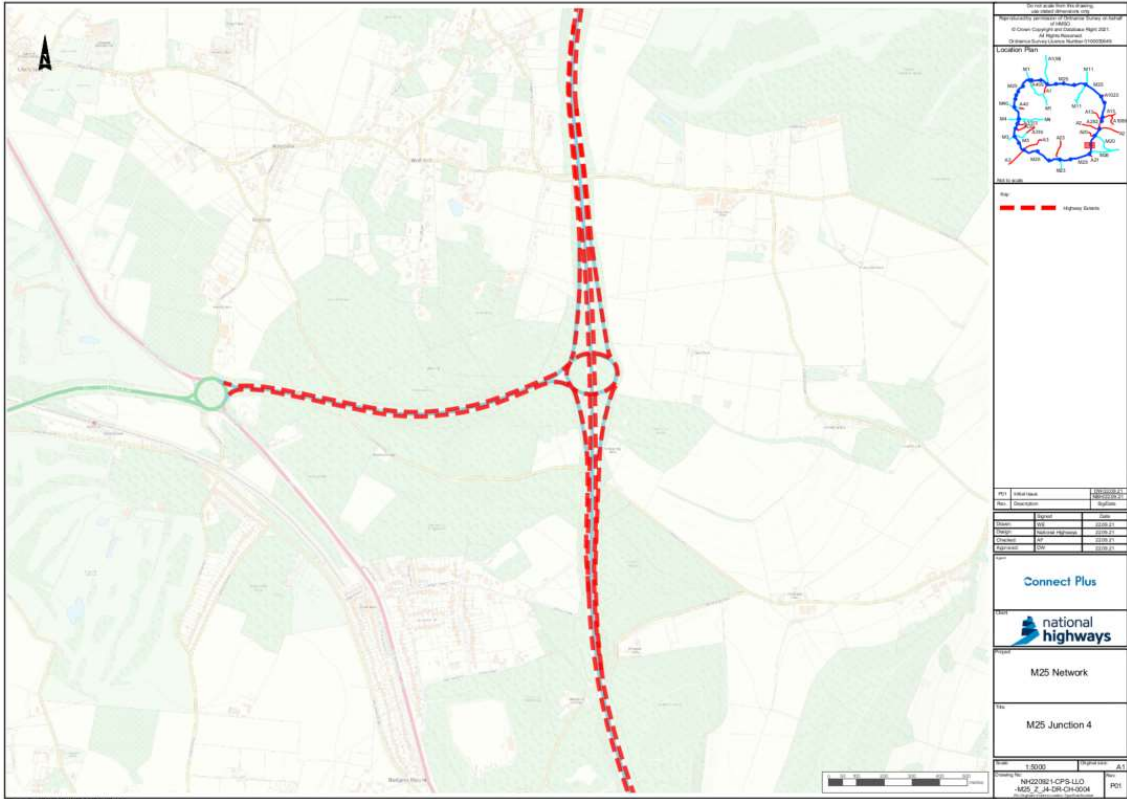
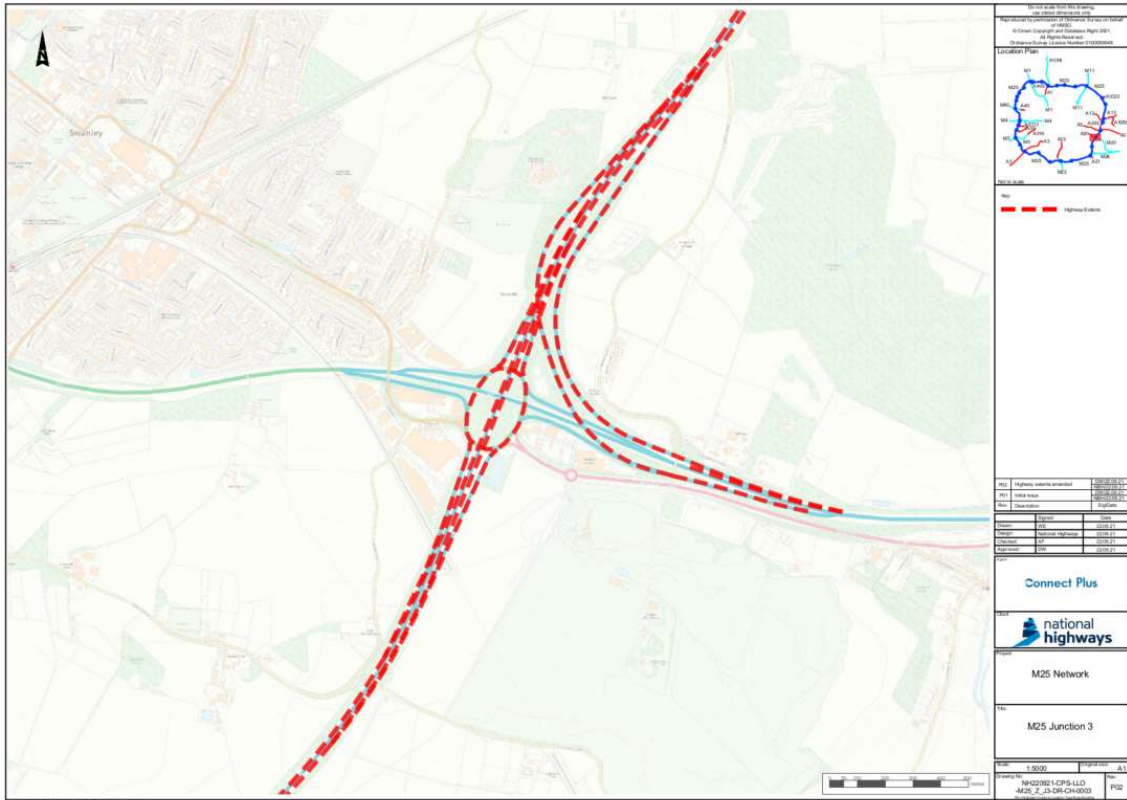
E: petra.billing@dlapiper.com and rob.shaw@dlapiper.com

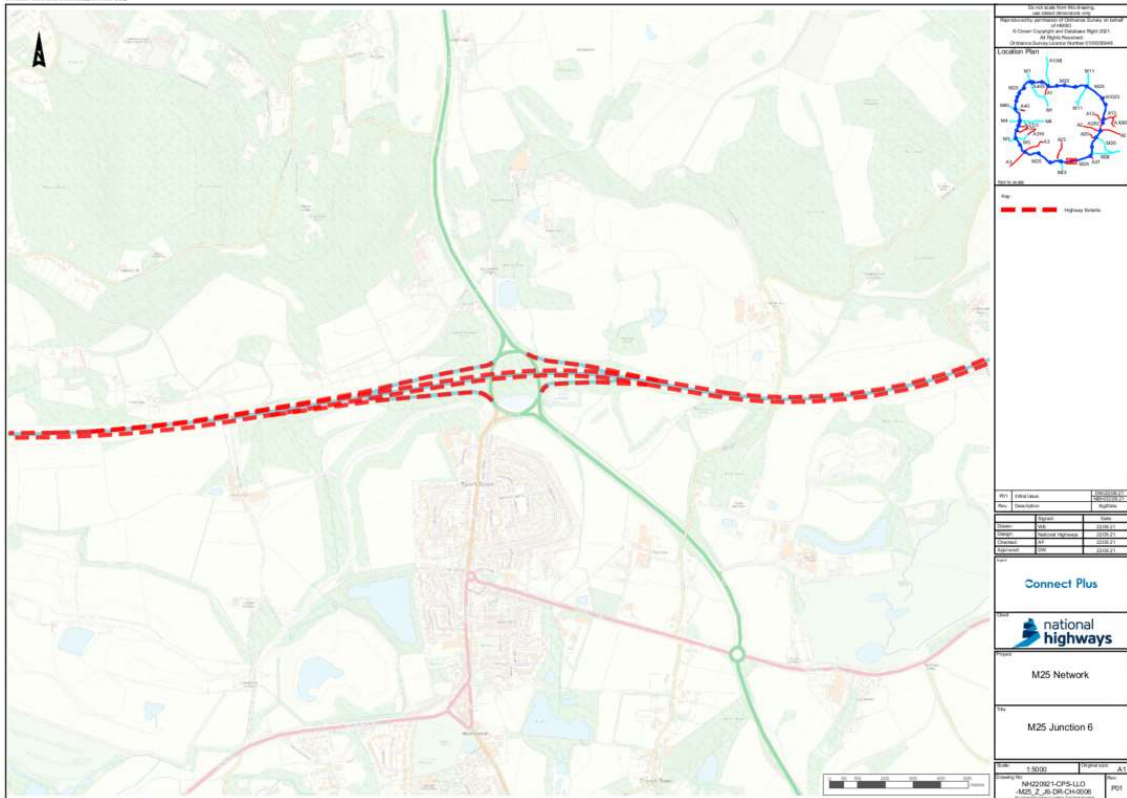
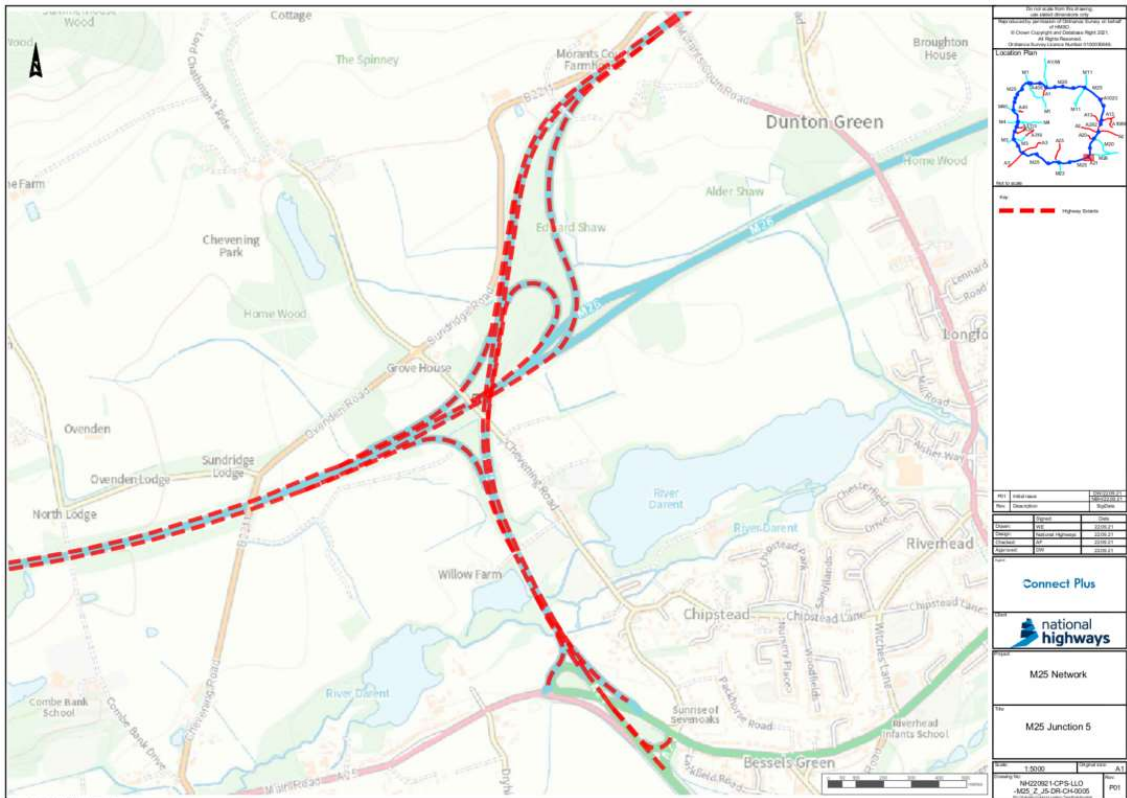
T: 0207 796 6047 / 0114 283 3312

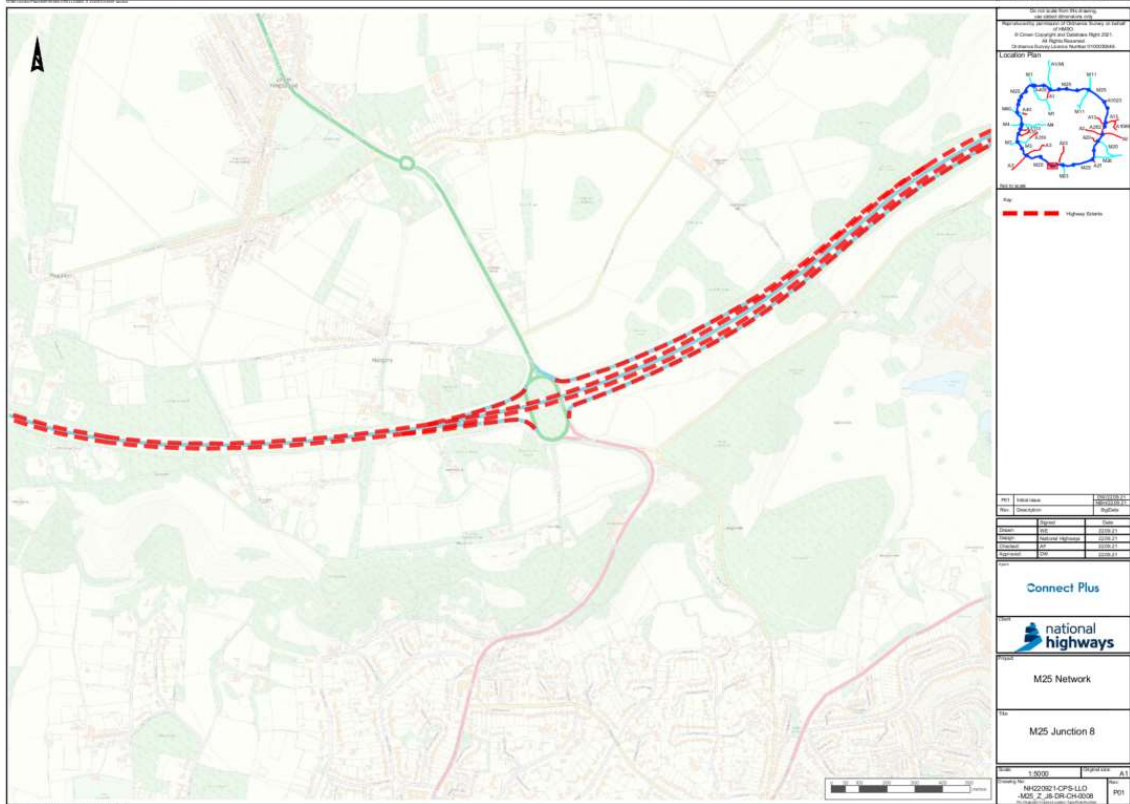
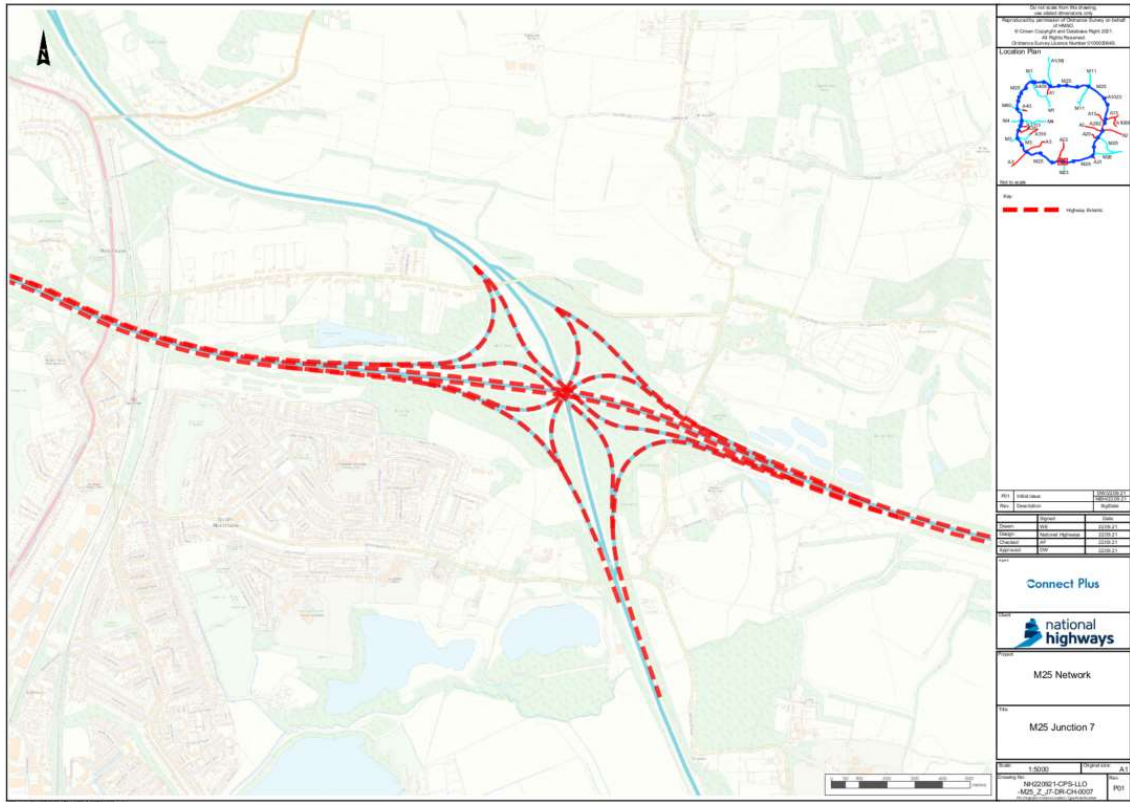
(The Court sat on 16th February 2023 from 10.34 to 14.46)

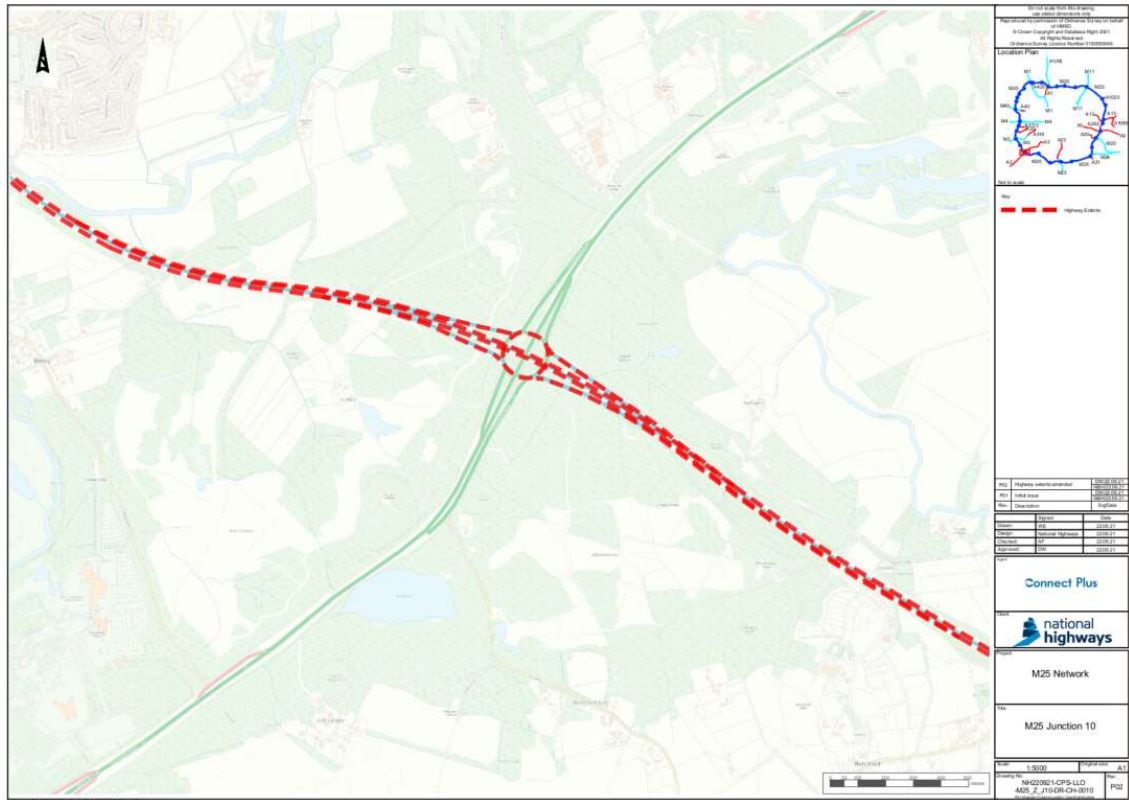
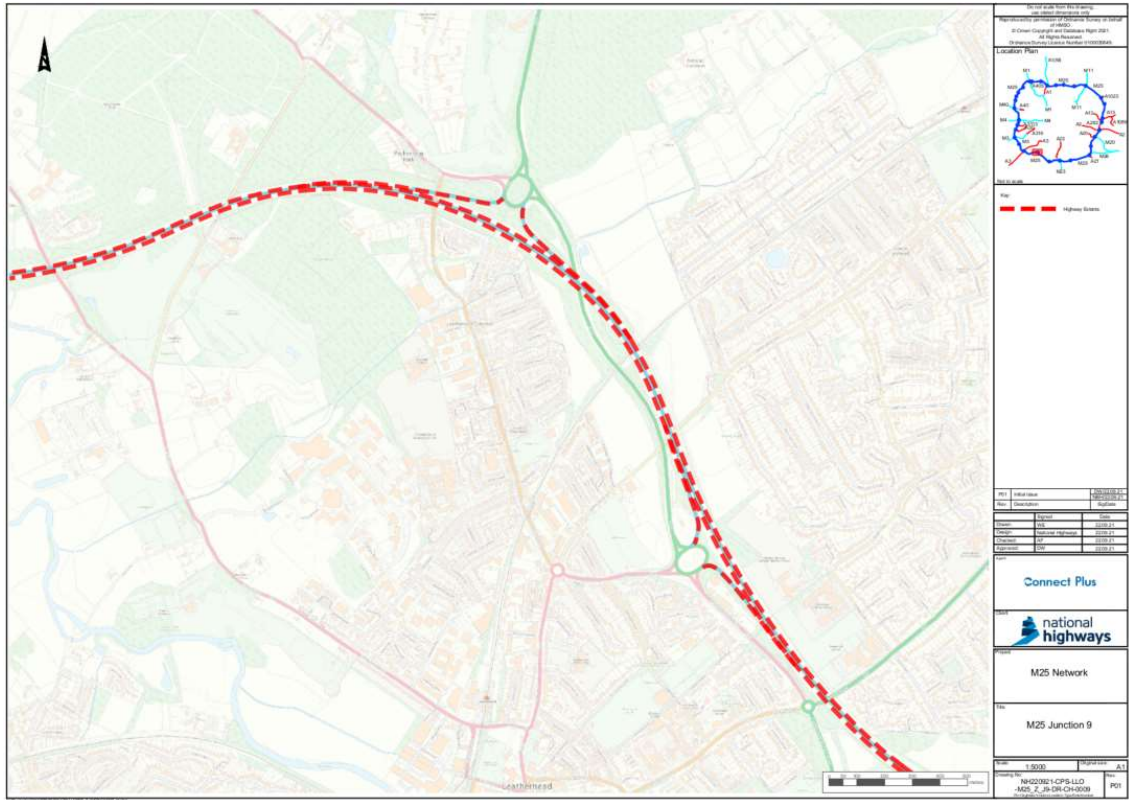
BY THE COURT

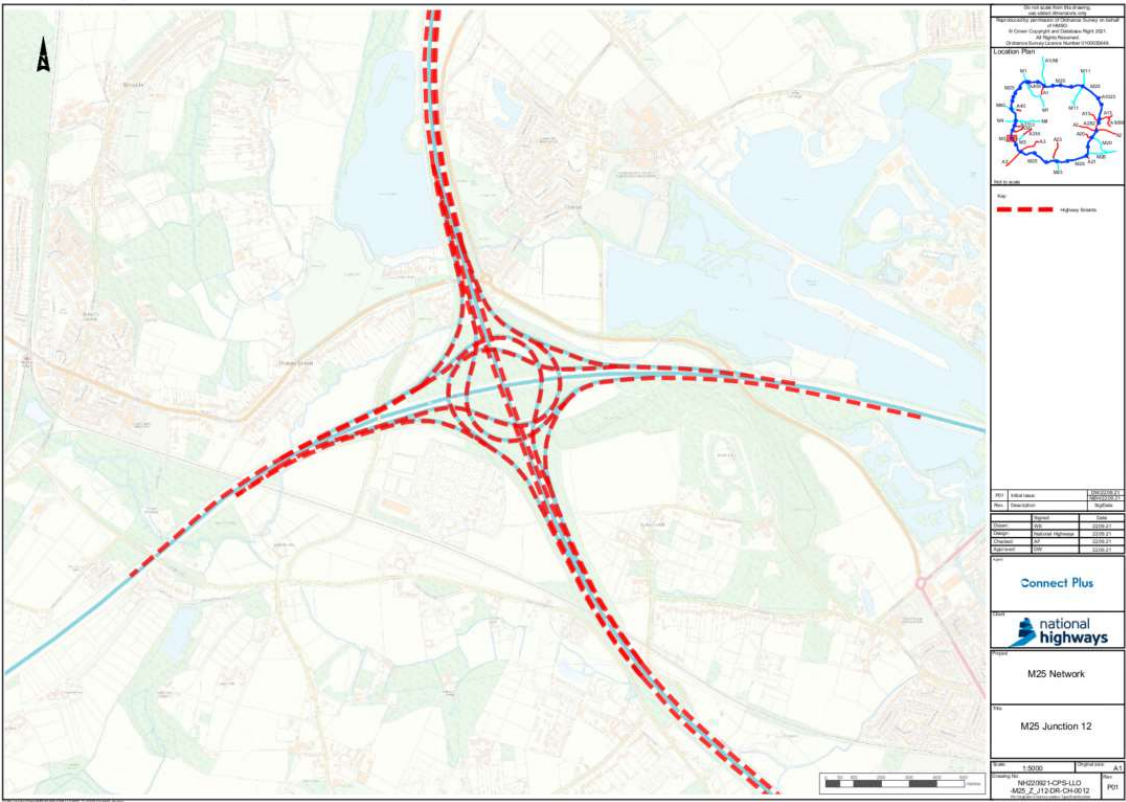
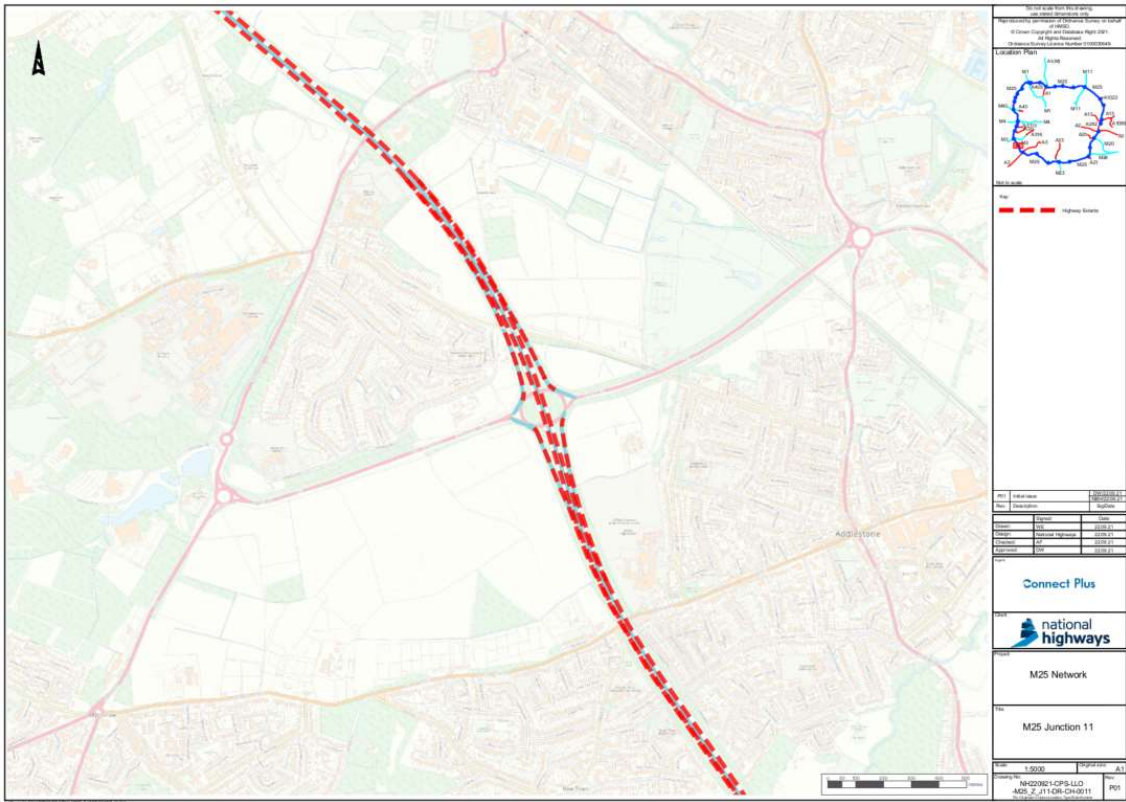




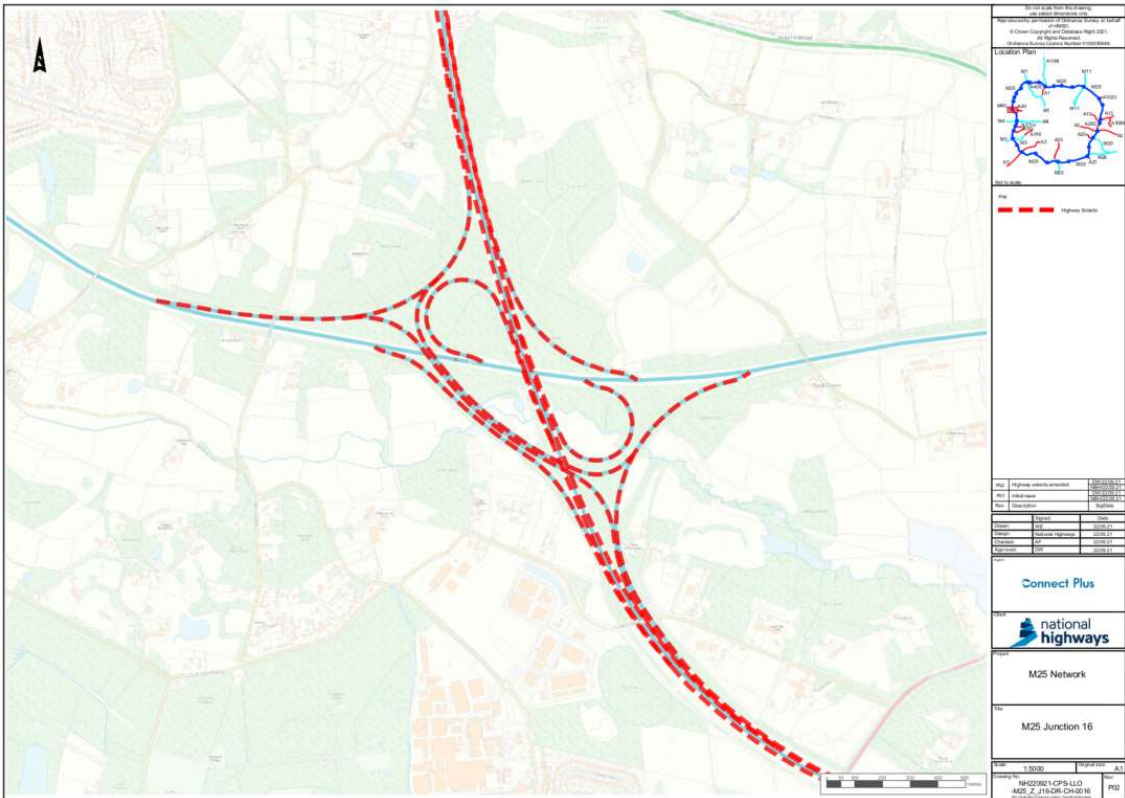
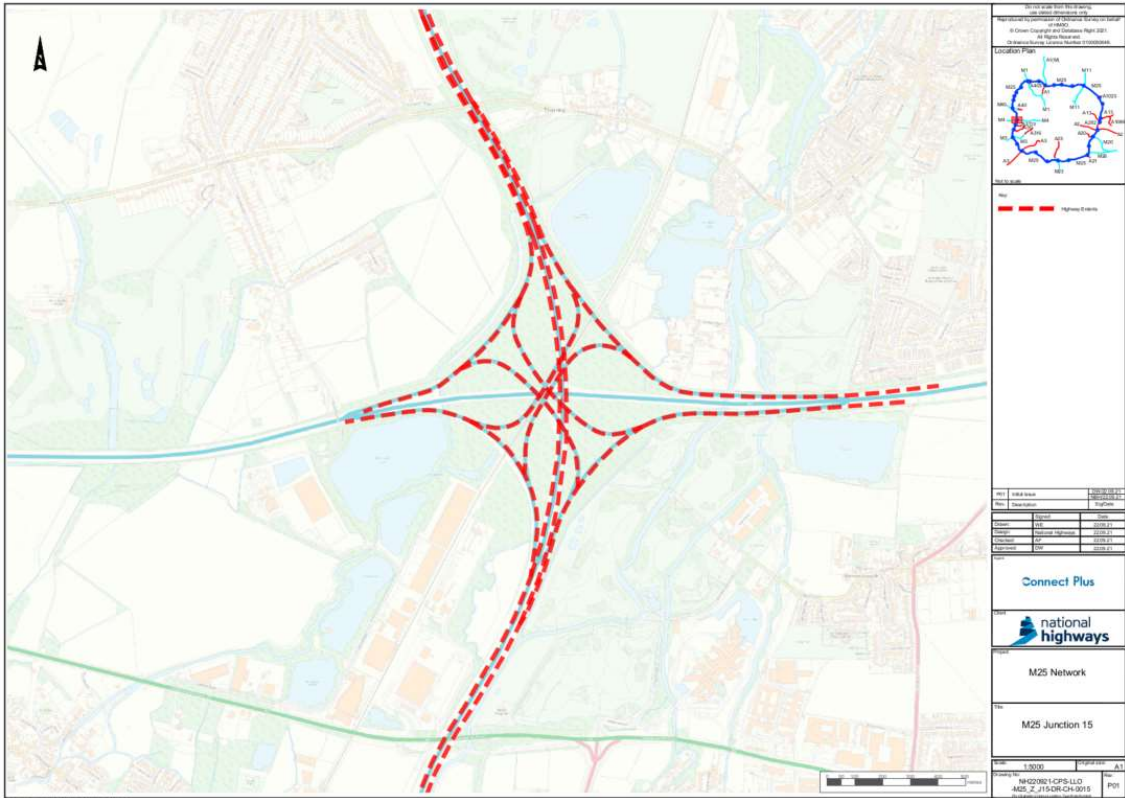


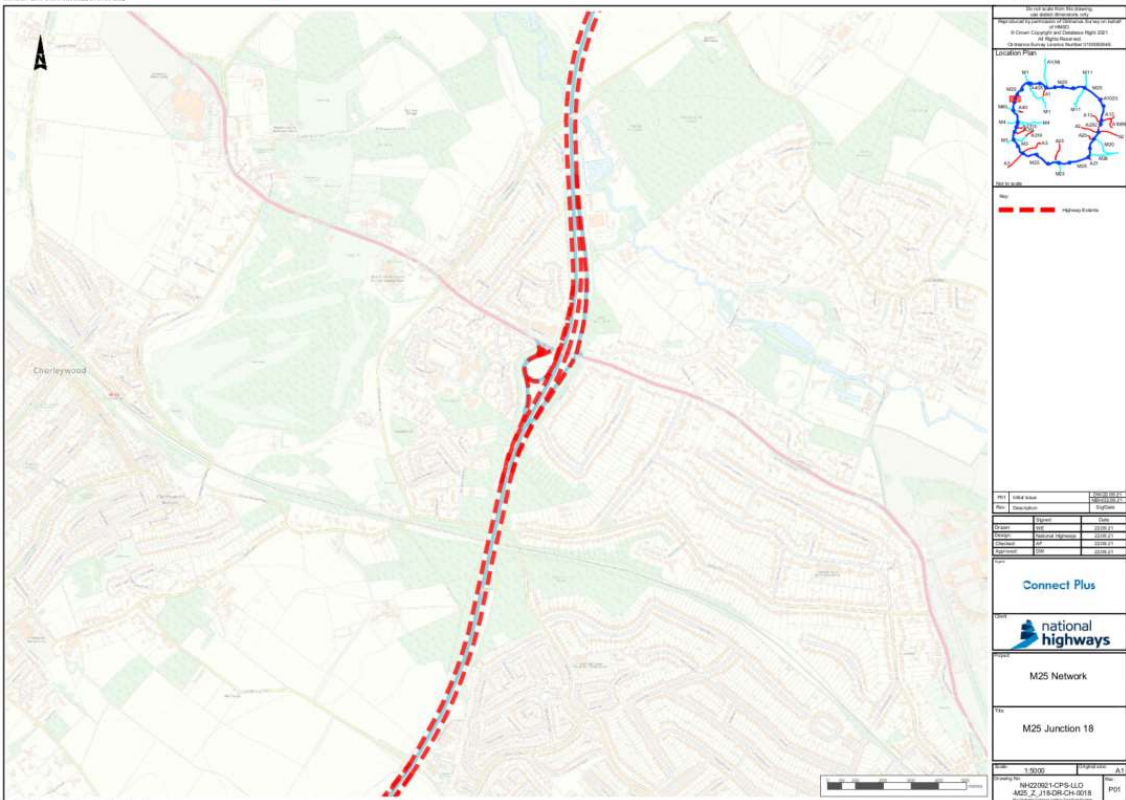
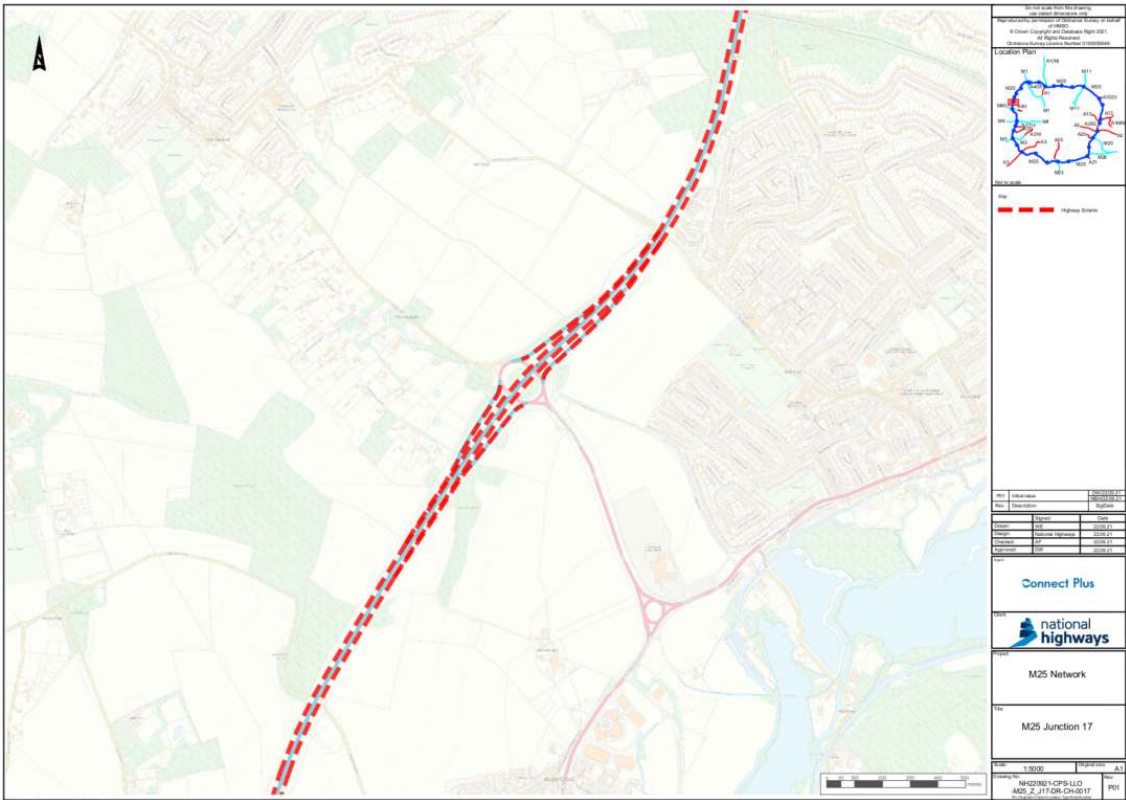


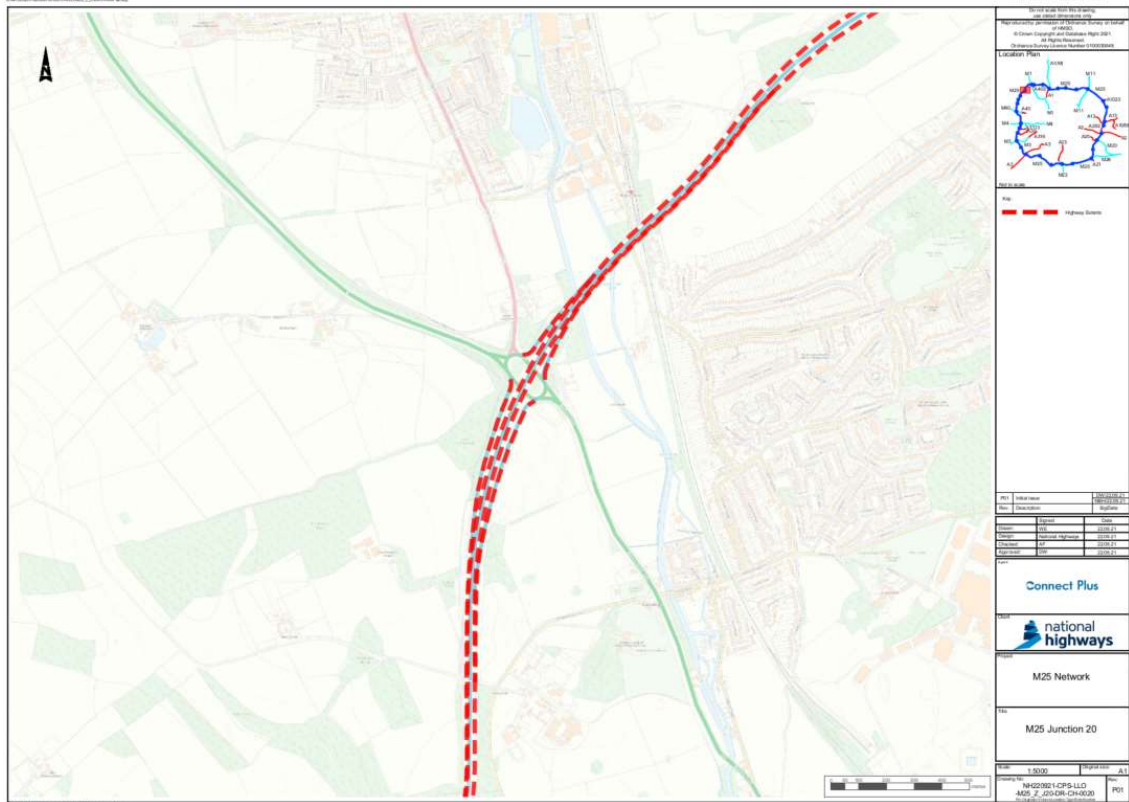
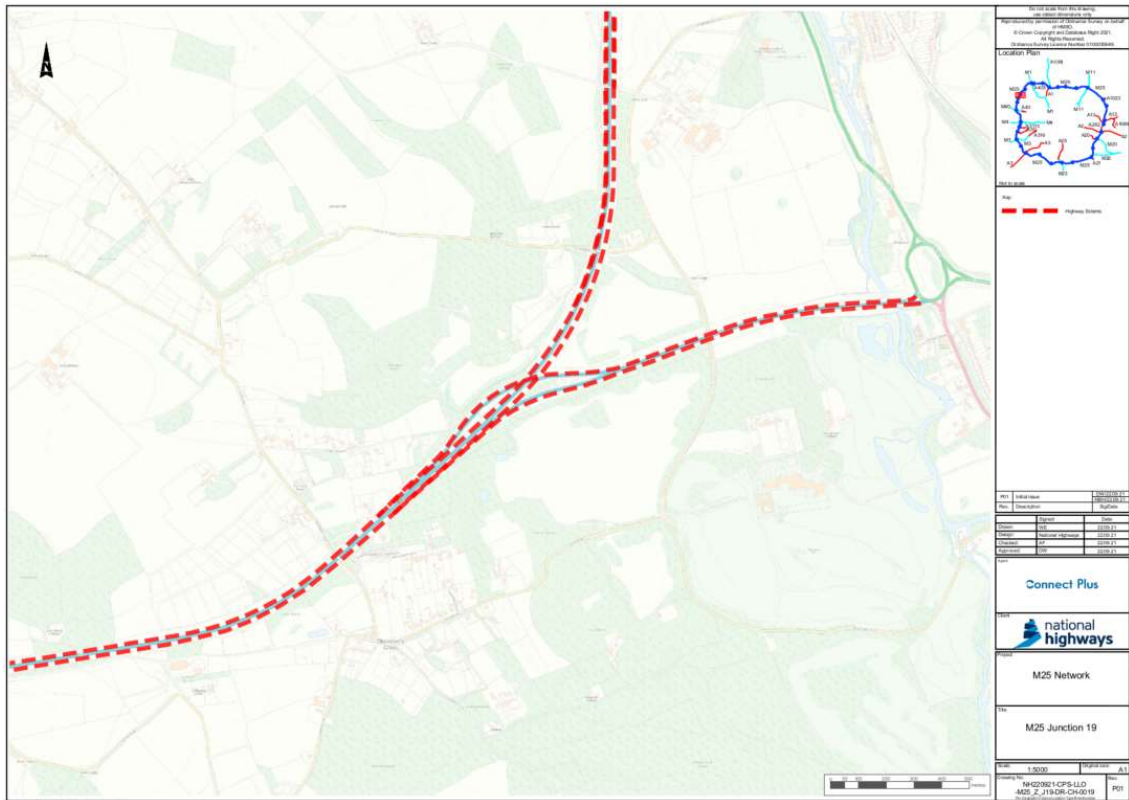


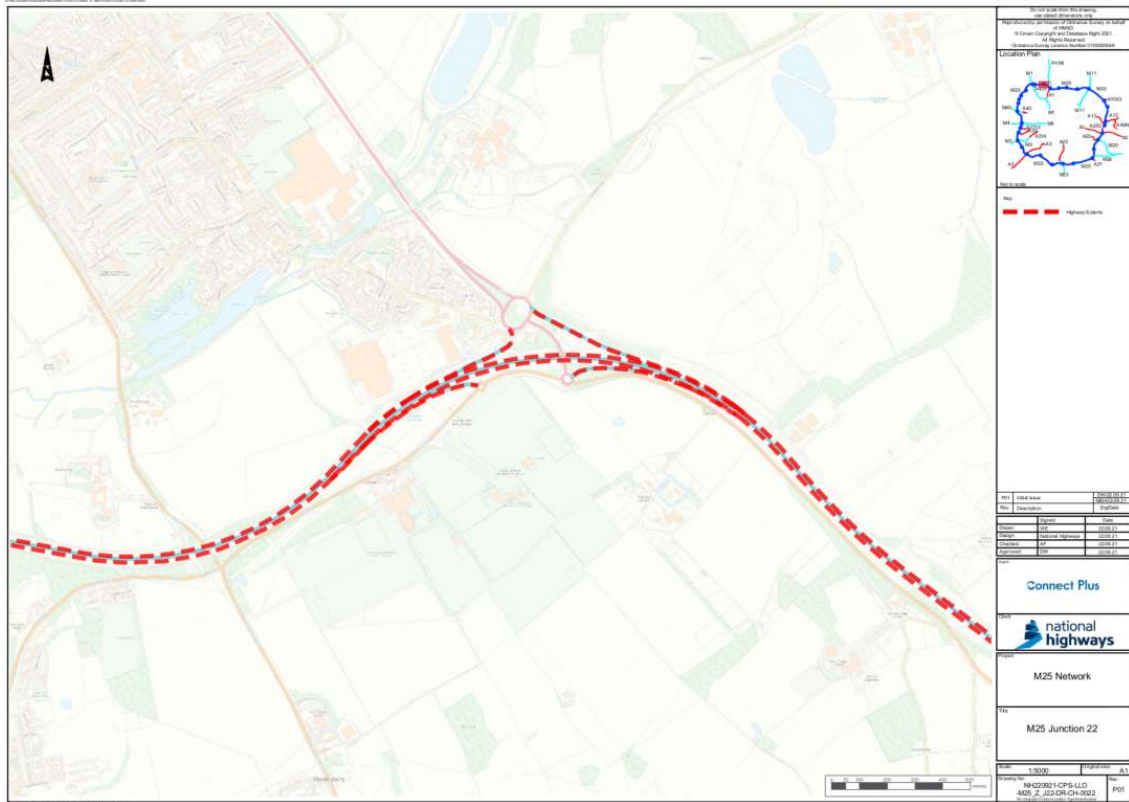
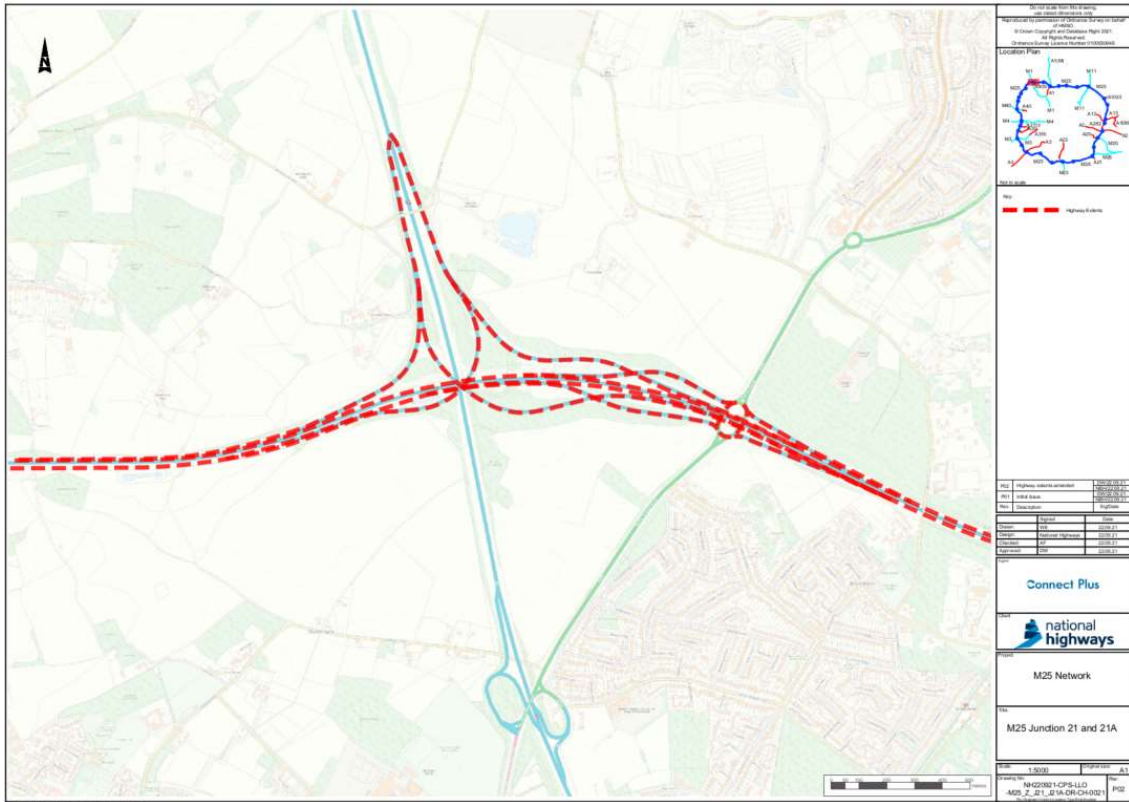


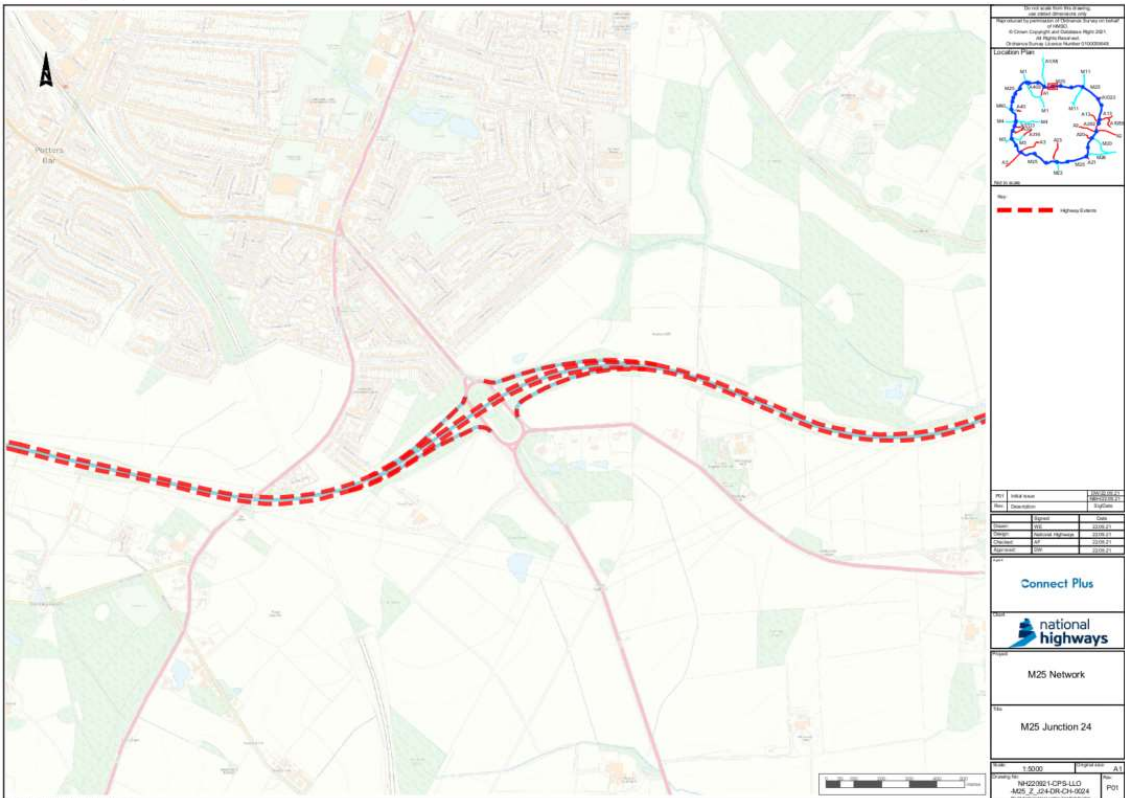
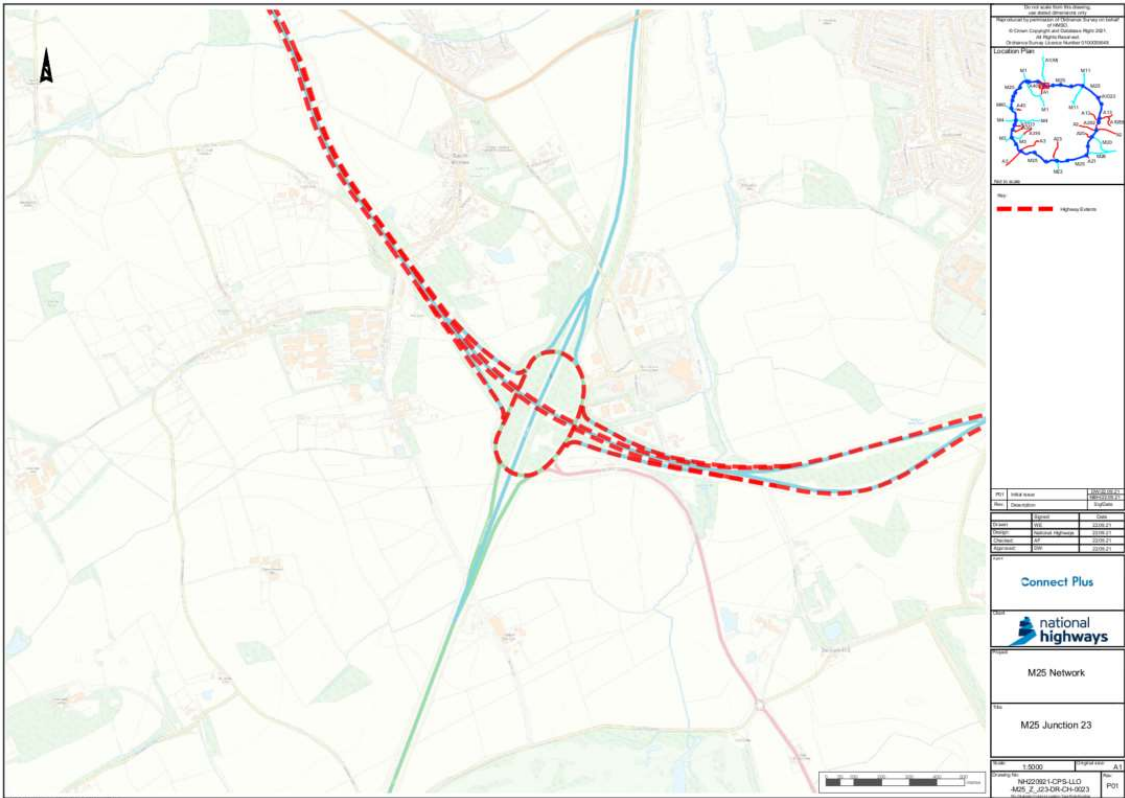


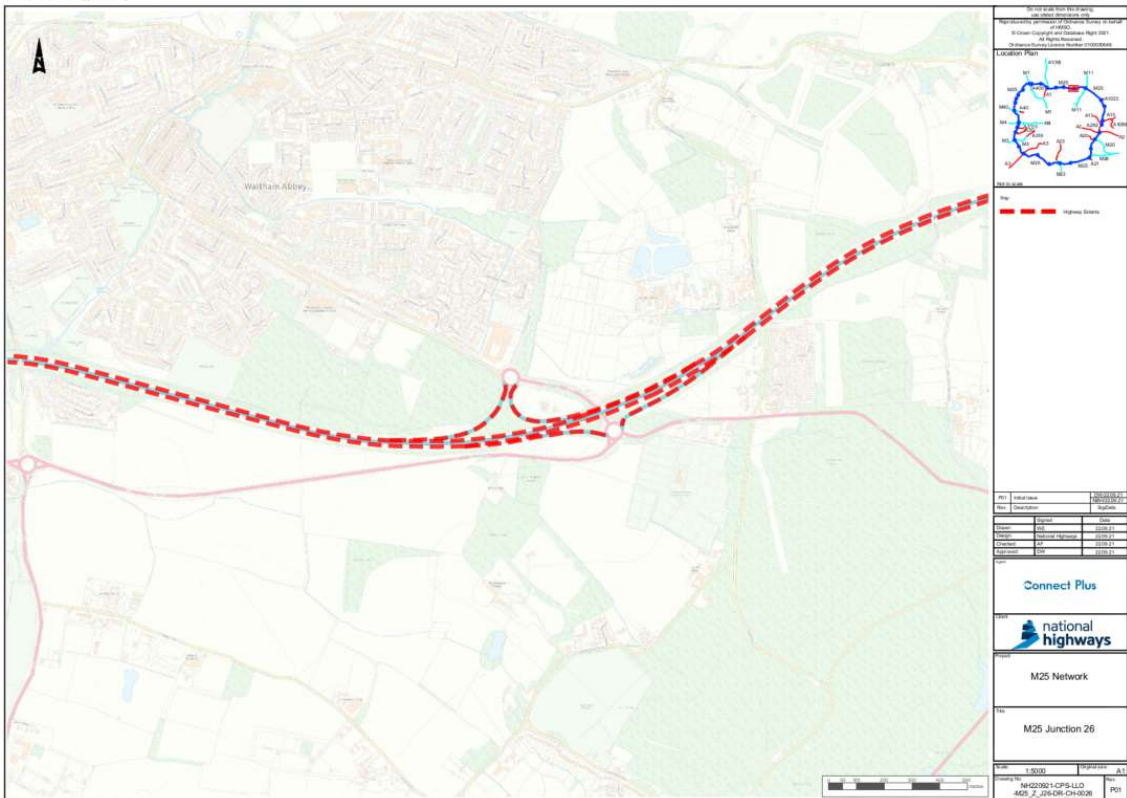
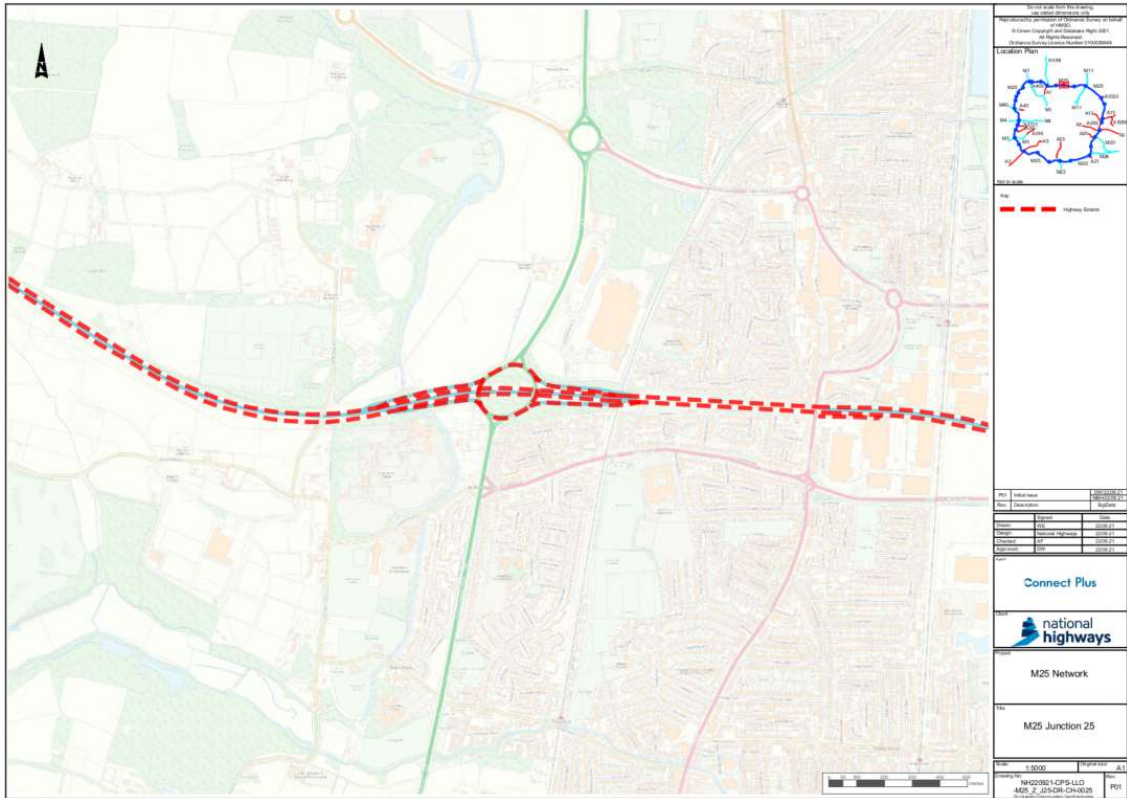


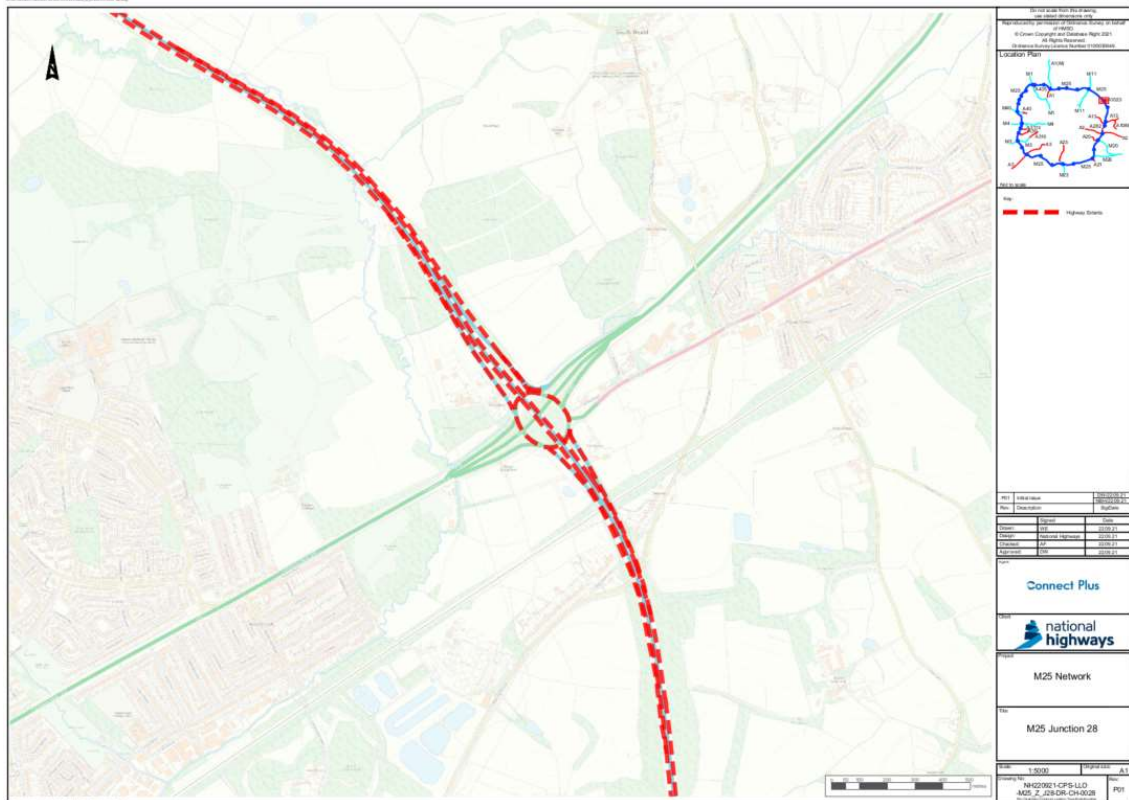
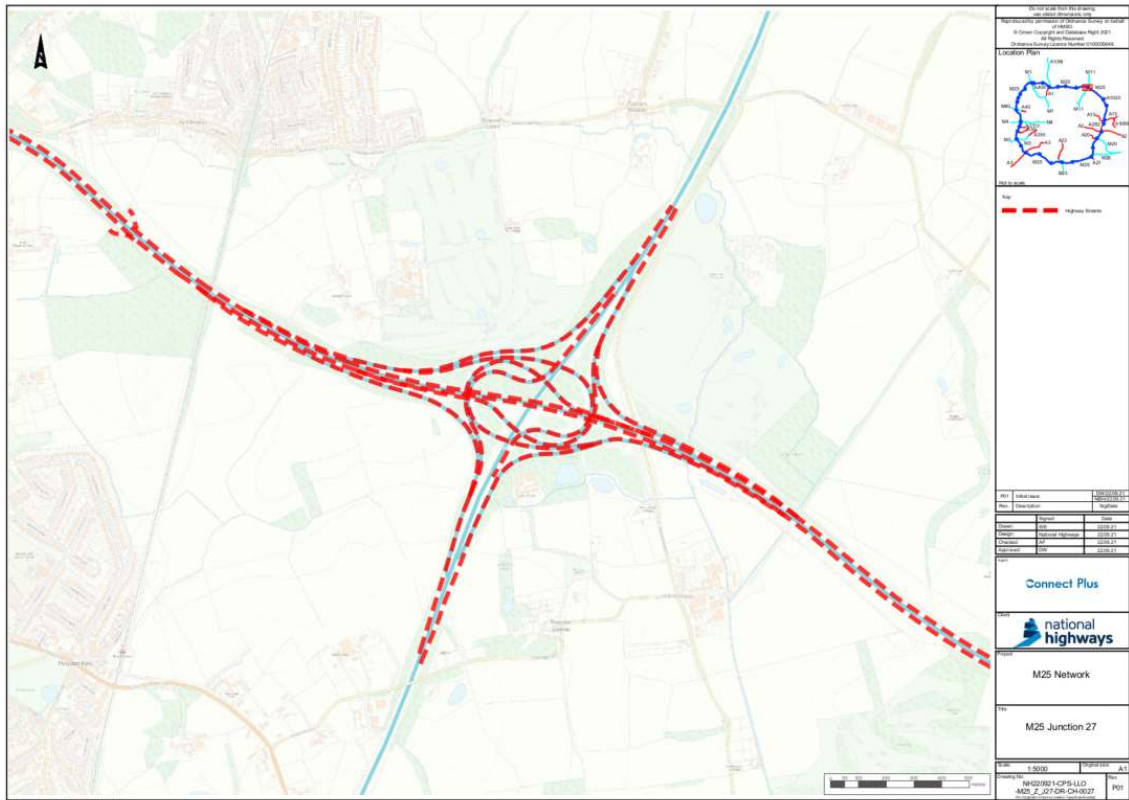


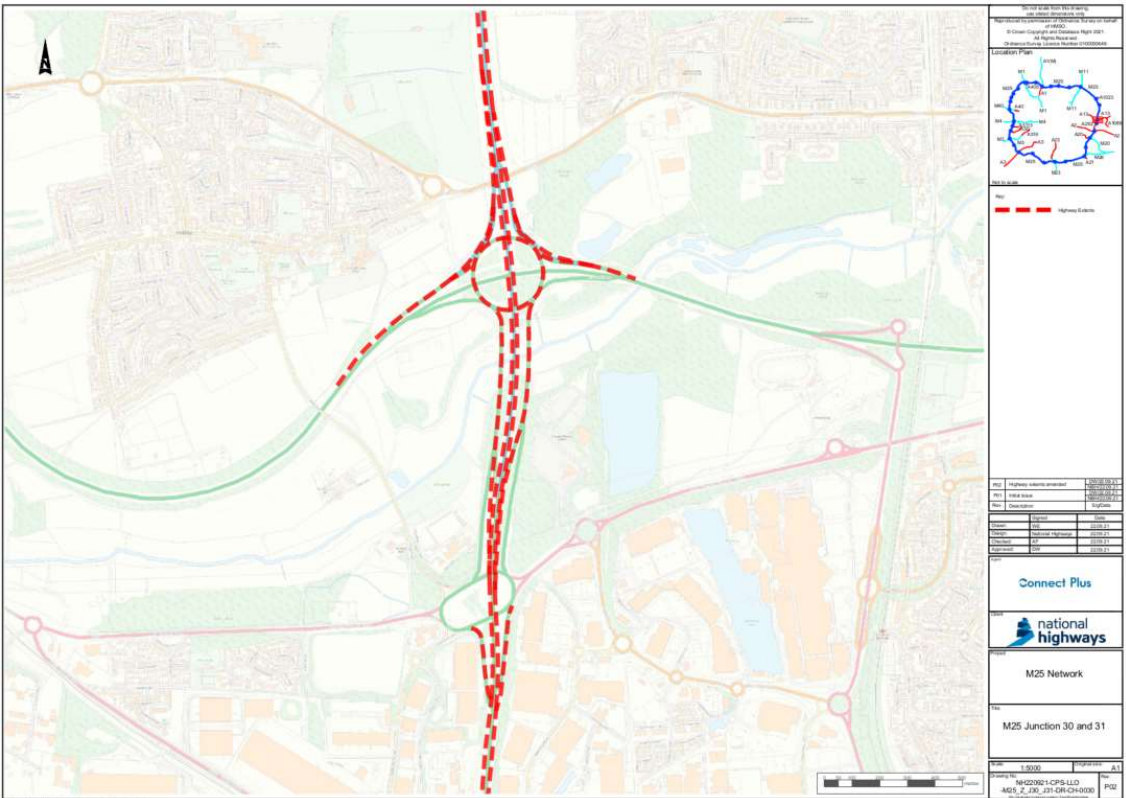
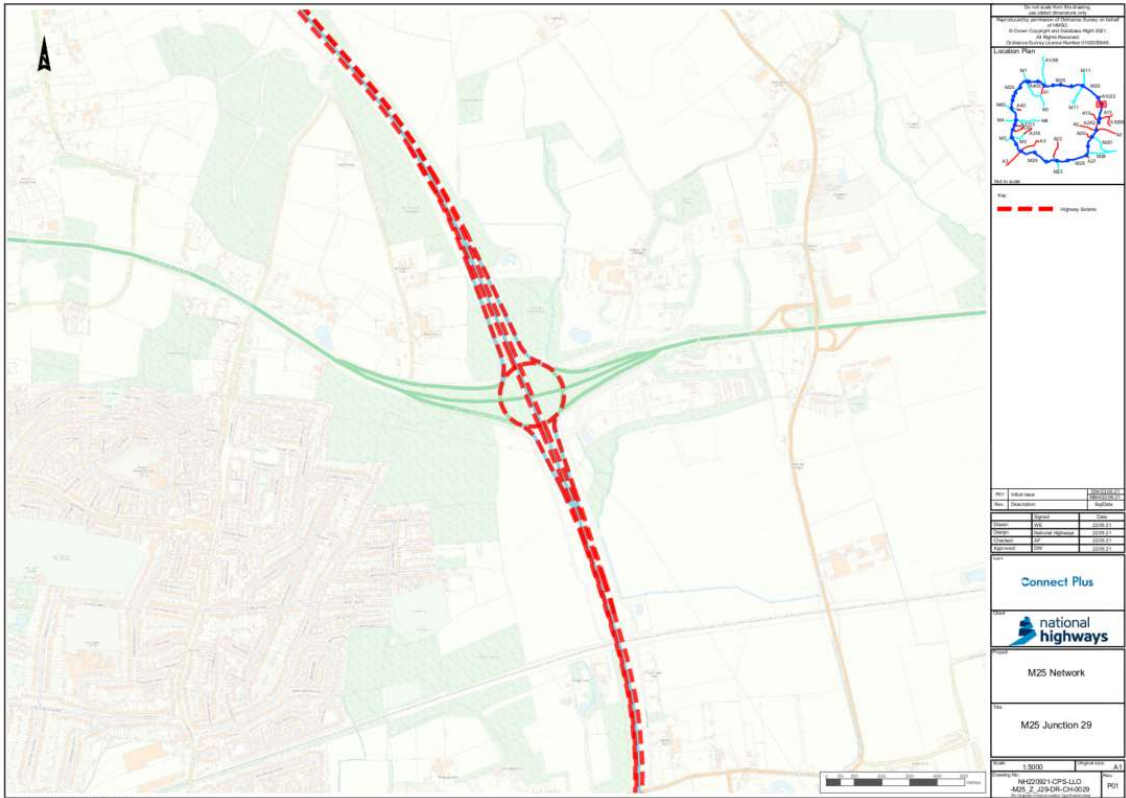






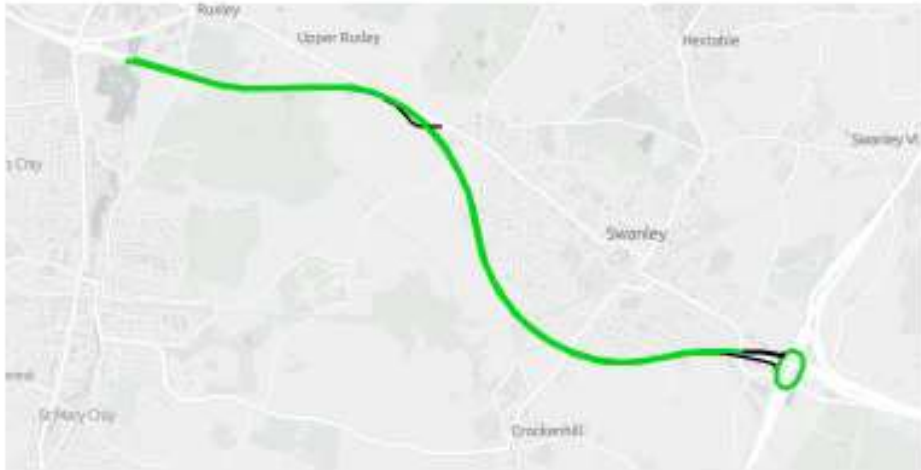






APPENDIX 2

A20 London - M25



M20



A20 Coast Section



A2 London – M2 Section



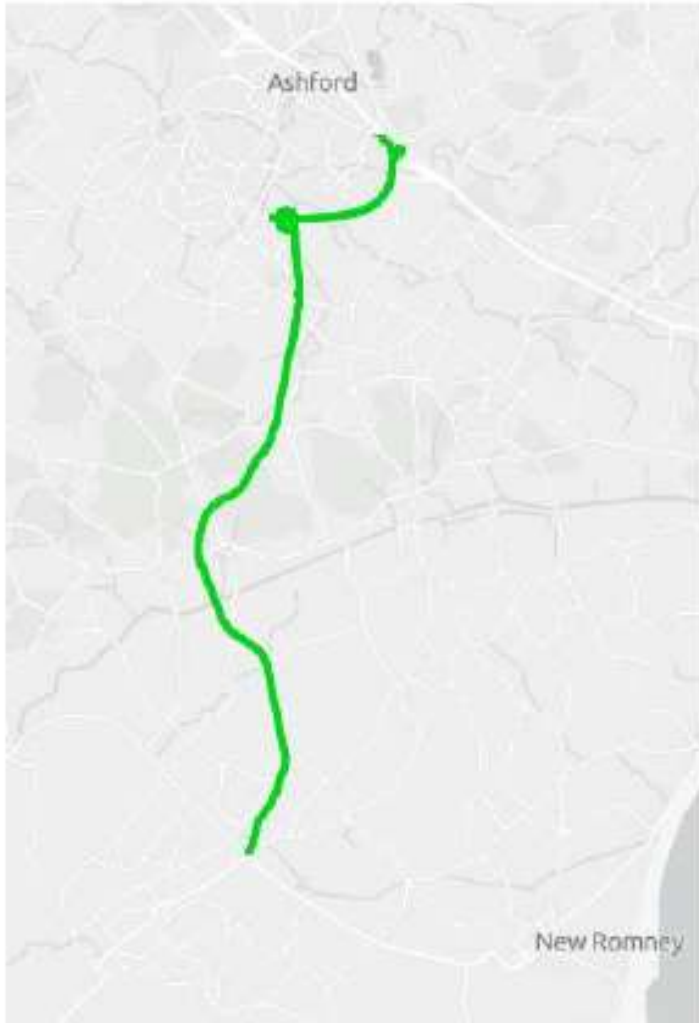
M2



A2 M2 - Dover Section



A2070

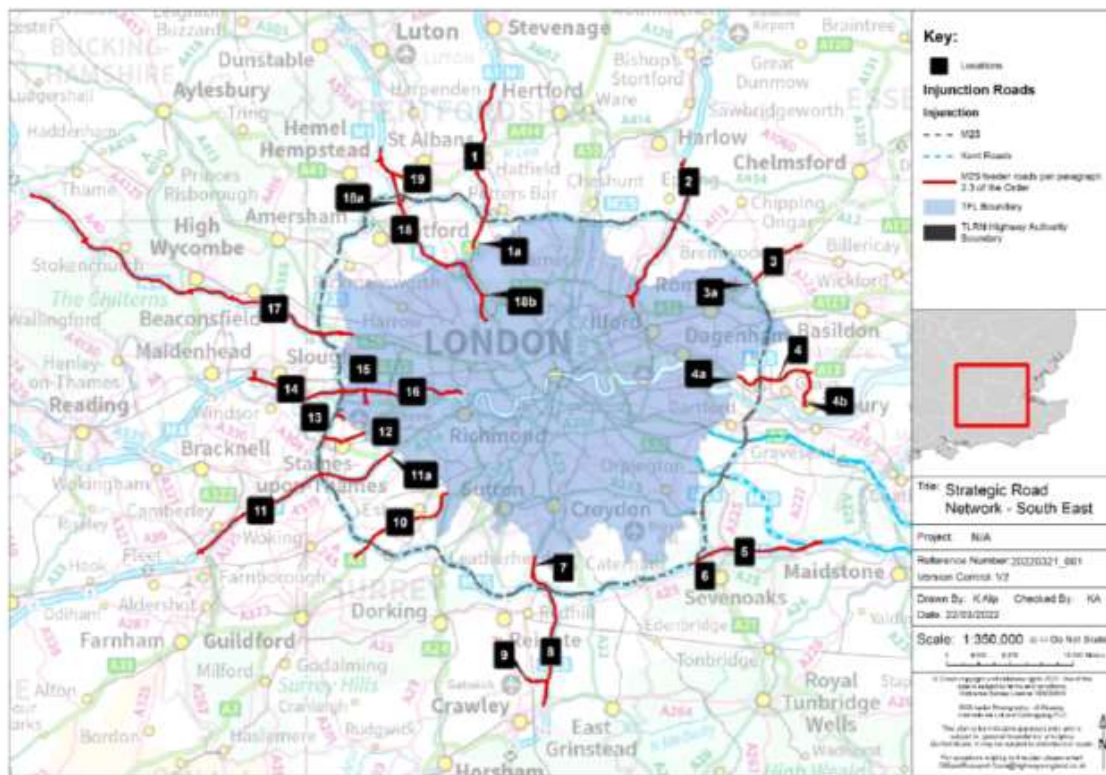


Kent & Surrounding areas SRN



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 Court order]

“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 CALL - Antony Nwanodi, Government Legal Department, Tel: 020 7210 3424”

[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 CALL - Antony Nwanodi, Government Legal Department, Tel: 020 7210 3424”

SCHEDULE 1 – NAMED DEFENDANTS

	Name	Address
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.	Alexander RODGER	[REDACTED]
3.	Alyson LEE	[REDACTED]
4.	Amy PRITCHARD	[REDACTED]
5.	Ana HEYATAWIN	[REDACTED]
6.	Andrew Taylor WORSLEY	[REDACTED]
7.	Anne TAYLOR	[REDACTED]
8.	Anthony WHITEHOUSE	[REDACTED]
9.	Barry MITCHELL	[REDACTED]
10.	Ben TAYLOR	[REDACTED]
11.	Benjamin BUSE	[REDACTED]
12.	Biff William Courtenay WHIPSTER	[REDACTED]
13.	Cameron FORD	[REDACTED]
14.	Catherine RENNIE-NASH	[REDACTED]
15.	Catherine EASTBURN	[REDACTED]
16.	Christian MURRAY-LESLIE	[REDACTED]
17.	Christian ROWE	[REDACTED]

18.	Cordelia ROWLATT	[REDACTED]
19.	Daniel Lee Charles SARGISON	[REDACTED]
20.	Daniel SHAW	[REDACTED]
21.	David CRAWFORD	[REDACTED]
22.	David JONES	[REDACTED]
23.	David NIXON	[REDACTED]
24.	David SQUIRE	[REDACTED]
25.	Diana Elizabeth BLIGH	[REDACTED]
26.	Diana HEKT	[REDACTED]
27.	Diana Lewen WARNER	[REDACTED]
28.	Donald BELL	[REDACTED]
29.	Edward Leonard HERBERT	[REDACTED]
30.	Elizabeth ROSSER	[REDACTED]
31.	Emma Joanne SMART	[REDACTED]
32.	Gabriella DITTON	[REDACTED]
33.	Gregory FREY	[REDACTED]
34.	Gwen HARRISON	[REDACTED]
35.	Harry BARLOW	[REDACTED]
36.	Ian BATES	[REDACTED]

37.	Ian Duncan WEBB	[REDACTED]
38.	James BRADBURY	[REDACTED]
39.	James Malcolm Scott SARGISON	[REDACTED]
40.	James THOMAS	[REDACTED]
41.	Janet BROWN	[REDACTED]
42.	Janine EAGLING	[REDACTED]
43.	Jerrard Mark LATIMER	jerrardmarkl@gmail.com [REDACTED]
44.	Jessica CAUSBY	[REDACTED]
45.	Jonathan Mark COLEMAN	[REDACTED]
46.	Joseph SHEPHERD	[REDACTED]
47.	Joshua SMITH	[REDACTED]
48.	Judith BRUCE	[REDACTED]
49.	Julia MERCER	[REDACTED]
50.	Julia SCHOFIELD	[REDACTED]
51.	Karen MATTHEWS	[REDACTED]
52.	Karen WILDIN	Kwildin@yahoo.com [REDACTED]
53.	Liam NORTON	[REDACTED]
54.	Louis MCKECHNIE	[REDACTED]

55.	Louise Charlotte LANCASTER	Xrlouiselancaster@protonmail.com [Redacted]
56.	Lucy CRAWFORD	[Redacted]
57.	Mair BAIN	[Redacted]
58.	Margaret MALOWSKA	[Redacted]
59.	Marguerite DOWBLEDAY	[Redacted]
60.	Maria LEE	[Redacted]
61.	Martin John NEWELL	[Redacted]
62.	Mary ADAMS	[Redacted]
63.	Matthew LUNNON	[Redacted]
64.	Matthew TULLEY	[Redacted]
65.	Meredith WILLIAMS	[Redacted]
66.	Michael BROWN	[Redacted]
67.	Michael Anthony WILEY	[Redacted]
68.	Michelle CHARLSWORTH	[Redacted]
69.	Natalie Clare MORLEY	[Redacted]
70.	Nathaniel SQUIRE	[Redacted]
71.	Nicholas COOPER	[Redacted]
72.	Nicholas ONLEY	[Redacted]
73.	Nicholas TILL	[Redacted]

74.	Oliver ROCK	[REDACTED]
75.	Paul COOPER	[REDACTED]
76.	Paul SHEEKY	[REDACTED]
77.	Peter BLENCOWE	[REDACTED]
78.	Peter MORGAN	[REDACTED]
79.	Phillipa CLARKE	[REDACTED]
80.	Priyadaka CONWAY	[REDACTED]
81.	Richard RAMSDEN	[REDACTED]
82.	Rob STUART	[REDACTED]
83.	Robin Andrew COLLETT	[REDACTED]
84.	Roman Andrzej PALUCH-MACHNIK	[REDACTED]
85.	Rosemary WEBSTER	[REDACTED]
86.	Rowan TILLY	[REDACTED]
87.	Ruth Ann COOK	[REDACTED]
88.	Ruth JARMAN	[REDACTED]
89.	Sarah HIRONS	[REDACTED]
90.	Simon REDING	[REDACTED]
91.	Stefania MOROSI	[REDACTED]
92.	Stephanie AYLETT	[REDACTED]

93.	Stephen Charles GOWER	[REDACTED]
94.	Stephen PRITCHARD	[REDACTED]
95.	Susan CHAMBERS	[REDACTED]
96.	Sue PARFITT	[REDACTED]
97.	Sue SPENCER- LONGHURST	[REDACTED]
98.	Susan HAGLEY	[REDACTED]
99.	Suzie WEBB	[REDACTED]
100.	Tessa-Marie BURNS	[REDACTED]
101.	Theresa NORTON	[REDACTED]
102.	Tim SPEERS	[REDACTED]
103.	Tim William HEWES	[REDACTED]
104.	Tracey MALLAGHAN	[REDACTED]
105.	Valerie SAUNDERS	[REDACTED]
106.	Venitia CARTER	[REDACTED]
107.	Victoria Anne LINSELL	[REDACTED]
108.	Xavier GONZALEZ TRIMMER	[REDACTED]
109.	Bethany MOGIE	[REDACTED]
110.	Indigo RUMBELOW	[REDACTED]
111.	Adrian TEMPLE- BROWN	[REDACTED]

112.	Ben NEWMAN	[REDACTED]
113.	Christopher PARISH	[REDACTED]
114.	Elizabeth SMAIL	[REDACTED]
115.	Julian MAYNARD SMITH	[REDACTED]
116.	Rebecca LOCKYER	[REDACTED]
117.	Simon MILNER- EDWARDS	[REDACTED]
118.	Stephen BRETT	[REDACTED]
119.	Virginia MORRIS	[REDACTED]
120.	Andria EFTHIMIOUS- MORDAUNT	[REDACTED] andriac4@gmail.com [REDACTED]
121.	Christopher FORD	[REDACTED]
122.	Darcy MITCHELL	[REDACTED]
123.	David MANN	[REDACTED]
124.	Ellie LITTEN	[REDACTED]
125.	Julie MACOLI	[REDACTED]
126.	Kai BARTLETT	[REDACTED]
127.	Sophie FRANKLIN	[REDACTED]
128.	Tony HILL	[REDACTED]
129.	Nicholas BENTLEY	[REDACTED]
130.	Nicola STICKELLS	[REDACTED]

131.	Mary LIGHT	[REDACTED]
132.	David McKENNY	[REDACTED]
133.	Giovanna LEWIS	[REDACTED]
134.	Margaret REID	[REDACTED]

SCHEDULE 2

Claim Nos. QB-2021-003576, 003626 and 003737

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

Before the Honourable Mr Justice Chamberlain
On 17 March 2022

B E T W E E N:

NATIONAL HIGHWAYS LIMITED

-and-



- (1) PERSONS UNKNOWN CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE PREVENTING THE FREE FLOW OF TRAFFIC ONTO OR ALONG THE M25 MOTORWAY FOR THE PURPOSES OF PROTESTING
- (2) PERSONS UNKNOWN CAUSING THE BLOCKING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE INTERFERING WITH THE FLOW OF TRAFFIC ONTO OR OFF OR ALONG THE A2, A20 AND 2070 TRUNK ROADS AND M2 AND M20 MOTORWAY FOR THE PURPOSE OF PROTESTING
- (3) PERSONS UNKNOWN CAUSING THE BLOCKING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE INTERFERING WITH THE FLOW OF TRAFFIC ONTO OR OFF OR ALONG THE 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
- (4) MR ALEXANDER RODGER AND 142 OTHERS

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

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

FURTHER TO the Orders made in these proceedings by Lavender J on 22 September 2021 (the “**M25 Order**”), Cavanagh J on 24 September 2021 (the “**Kent Roads Order**”) and Holgate J on 4 October 2021 (the “**Feeder Roads Order**”)

AND UPON the Claimant’s application by Application Notice dated 4 March 2022, pursuant to the liberty to apply provisions at paragraph 7 of the M25 and Kent Roads Orders and paragraph 10 of the Feeder Roads Order to extend the duration of the injunctions contained at paragraph 2 of the M25 and Kent Roads Orders and paragraph 4 of the Feeder Roads Order (the “**Extension Application**”)

AND UPON READING the Witness Statement of Robert Shaw dated 4 March 2022, and the Claimant’s skeleton argument.

AND UPON hearing David Elvin QC, Counsel for the Claimant

AND UPON the Court accepting the Claimant’s undertaking that it will provide to the Defendants copies of further evidence or other documents filed in these proceedings upon request, following the Defendants or their representatives providing contact details to the Claimant’s solicitors

AND UPON the Court accepting the Claimant’s renewed undertaking that the Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss

AND UPON the Court accepting the Claimant’s renewed undertaking to identify and name Defendants and apply to add them as named Defendants to this Order as soon as reasonably practicable

AND UPON the Claimant confirming that this Order is not intended to prohibit lawful protest which does not endanger, slow, obstruct, prevent or otherwise interfere with the flow of traffic onto off or along the M25, Kent Roads or Feeder Roads nor to prevent lawful use of the Roads by any person

AND UPON the Claimant confirming that it will file summary judgment applications in respect of Claim Nos. QB-2021-003576, 003626 and 003737 as soon as reasonably practicable

AND UPON the Chief Constables for those forces listed in Schedule 2 to this order having consented to an order being made in the terms set out below

IT IS ORDERED THAT:

Continuation of the M25 Order

1. For the purposes of this Order, the

1.1 M25 means the London Orbital Motorway including but not limited to the verges, central reservation, on- and off-slip roads, overbridges and underbridges including the Dartford Crossing and Queen Elizabeth II Bridge, and any apparatus related to that motorway.

1.2 the Kent Roads mean the A2, A20, A2070, M2 and M20 as identified in the plans annexed at Annex A to this Order, including but not limited to the verges, central reservation, on- and off-slip roads, overbridges and underbridges and any apparatus related to that motorway;

1.3 the Feeder Roads mean the A1(M) (Junction 1 to Junction 6), M11 (Junction 4 to Junction 7), A12 (M25 Junction 28 to A12 Junction 12), A13 (M25 Junction 30 to A1089), 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), 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) and A414 (M1 Junction 8 to A405) as identified by the descriptions and plan annexed at Annex B to this Order, including but not limited to the verges, central reservation, on- and off-slip roads, overbridges and underbridges, including any roundabouts for access to and from the Feeder Roads, and any apparatus related to those roads.

(together the “**Roads**”).

Continuation of the M25 Order

2. The long-stop date of 21 March 2022 be deleted, and the injunction at paragraph 2 of the M25 Order as set out in full at paragraph 3 below shall continue until 9 May 2022 or further order.

Injunction in force – M25 Order

3. With immediate effect and until the earlier of (i) Trial; (ii) Further Order; or (iii) 23.59 pm on 9 May 2022, the Defendants and each of them are forbidden from:

3.1 Blocking, endangering, slowing down, preventing, or obstructing the free flow of traffic onto or along or off the M25 for the purposes of protesting.

3.2 Causing damage to the surface of or to any apparatus on or around the M25 including but not limited to painting, damaging by fire, or affixing any item or structure thereto.

3.3 Affixing themselves (“locking on”) to any other person or object on the M25.

3.4 Erecting any structure on the M25.

3.5 Tunnelling in the vicinity of the M25.

3.6 Entering onto the M25 unless in a motor vehicle.

3.7 Abandoning any vehicle or item on the M25 with the intention of causing an obstruction.

3.8 Refusing to leave the area of the M25 when asked to do so by a police constable, National Highways Traffic Officer or High Court Enforcement Officer.

3.9 Causing, assisting or encouraging any other person to do any act prohibited by paragraphs 3.1 – 3.8 above.

3.10 Continuing any act prohibited by paragraphs 3.1 – 3.9 above.

Continuation of the Kent Roads Order

4. The long-stop date of 24 March 2022 be deleted, and the injunction at paragraph 2 of the Kent Roads Order as set out in full at paragraph 5 below shall continue until 9 May 2022 or further order.

Injunction in force - Kent Roads Order

5. With immediate effect and until the earlier of (i) Trial; (ii) Further Order; or (iii) 23.59 pm on 9 May 2022, the Defendants and each of them are forbidden from:
 - 5.1 Blocking, slowing down, obstructing or otherwise interfering with the flow of traffic onto or along or off the Roads for the purpose of protesting.
 - 5.2 Blocking, slowing down, obstructing or otherwise interfering with access to or from the Roads, and on any adjacent roads, slip roads or roundabouts which are not vested in the Claimant, for the purpose of protesting.
 - 5.3 Causing damage to the surface of or to any apparatus on or around the Roads including but not limited to painting, damaging by fire, or affixing any item or structure thereto.
 - 5.4 Affixing themselves (“locking on”) to any other person or object on the Roads.
 - 5.5 Erecting any structure on the Roads.
 - 5.6 Tunnelling in the vicinity of the Roads.
 - 5.7 Entering onto the Roads unless in a motor vehicle.
 - 5.8 Abandoning any vehicle or item on the Roads with the intention of causing an obstruction.

5.9 Refusing to leave the area within 50m of the centre of the Roads when asked to do so by a police constable, National Highways Traffic Officer or High Court Enforcement Officer.

5.10 Causing, assisting or encouraging any other person to do any act prohibited by paragraphs 5.1 – 5.9 above.

5.11 Continuing any act prohibited by paragraphs 5.1 – 5.10 above.

Continuation of the Feeder Roads Order

6. The long-stop date of 24 March 2022 be deleted, and the injunction at paragraph 4 of the Feeder Roads Order as set out in full at paragraph 7 below shall continue 9 May 2022 or further order.

Injunction in force – Feeder Roads Order

7. With immediate effect and until the earlier of (i) Trial; (ii) Further Order; or (iii) 23.59 pm on 9 May 2022, the Defendants and each of them are forbidden from:

7.1 Blocking, slowing down, obstructing or otherwise interfering with the flow of traffic onto or along or off the Roads for the purpose of protesting.

7.2 Blocking, slowing down, obstructing or otherwise interfering with access to or from the Roads, and on any adjacent roads, slip roads or roundabouts which are not vested in the Claimant, for the purpose of protesting.

7.3 Causing damage to the surface of or to any apparatus on or around the Roads including but not limited to painting, damaging by fire, or affixing any item or structure thereto.

7.4 Affixing themselves (“locking on”) to any other person or object on the Roads.

7.5 Erecting any structure on the Roads.

7.6 Tunnelling in the vicinity of the Roads.

7.7 Entering onto the Roads unless in a motor vehicle.

- 7.8 Abandoning any vehicle or item on the Roads with the intention of causing an obstruction.
- 7.9 Refusing to leave the area within 50m of the centre of the Roads when asked to do so by a police constable, National Highways Traffic Officer or High Court Enforcement Officer.
- 7.10 Causing, assisting or encouraging any other person to do any act prohibited by paragraphs 7.1 – 7.9 above.
- 7.11 Continuing any act prohibited by paragraphs 7.1 – 7.10 above.

Alternative Service

- 8. The Claimant is permitted in addition to personal service to serve this Order and other documents in these proceedings by the following three methods:
 - 8.1 placing a copy of this Order on the National Highways website; and
 - 8.2 sending a copy of this Order to Insulate Britain's email addresses: Insulate Britain ring2021@protonmail.com and insulatebritainlegal@protonmail.com; and
 - 8.3 posting a copy of this Order together with covering letter through the letterbox of each Defendant (or leaving in a separate mailbox) with a notice affixed to the front door if necessary, drawing the recipient's attention to the fact the package contains a court order. If the premises do not have a letterbox, or mailbox, a package containing this Order may be affixed to the front door 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 Schedule 1; or
 - 8.4 instead of by post as set out in paragraph 8.3 above, by email in circumstances where a Defendant has requested email service of documents.
- 9. Compliance with paragraph 8 shall constitute service of this Order.

Third-Party Disclosure

10. The disclosure obligations contained in the order of Thornton J dated 24 November 2021, as set out in full at paragraph 11 below, shall be extended to continue until 31 July 2022 or further order.
11. The Chief Constables for those forces listed in the Schedule to this order shall disclose to the Claimant:
 - 11.1 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 highway referred to in these proceedings; and
 - 11.2 all arrest notes, body camera footage and/or all other photographic material relating to possible breaches of the Orders.
12. The Claimant is to serve this order on the Police Representative Assistant Chief Constable Owen Weatherill (owen.weatherill@npocc.police.uk), by email only.

Further directions

13. 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 immediately (and in any event not less than 48 hours before the hearing of any such application).
14. Any person applying to vary or discharge this order must provide their full name and address, an address for service, and must also apply to be joined as a named defendant to the proceedings at the same time (to the extent they are not already so named).
15. The Claimant has permission to apply to extend or vary this Order or for further directions.
16. The Claimant is to file its application for summary judgment ("**the Application**") by 4pm on 25 March 2022.
17. The Claimant is to serve the Application and evidence in support thereof on the Defendants by 4pm on 5 April 2022.

18. Any Defendant wishing to file evidence in response to the Application is to file and serve such evidence in response by 4pm on 22 April 2022.
19. The Claimant and any Defendant wishing to file a Skeleton Argument are to file and serve a Skeleton Argument by 4pm on 27 April 2022.
20. The Application is listed for 4-5 May 2022 with a time estimate of 2 days, with 3 May 2022 set aside as a judicial reading day.
21. Costs reserved.

Communications with the Claimant

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

FAO Petra Billing/ Rob Shaw (petra.billing@dlapiper.com / rob.shaw@dlapiper.com)

DLA Piper UK LLP
1 St Paul's Place
Sheffield
S1 2JX

Reference – RXS/366530/107

BY THE COURT

Dated: 18 March 2022

SCHEDULE 3
CHIEF CONSTABLES OF THE FORCES OF:

City of London Police

Metropolitan Police Service

Avon and Somerset Constabulary

Bedfordshire Police

Cambridgeshire Constabulary

Cheshire Constabulary

Cleveland Police

Cumbria Constabulary

Derbyshire Constabulary

Devon & Cornwall Police

Dorset Police

Durham Constabulary

Essex Police

Gloucestershire Constabulary

Greater Manchester Police

Hampshire Constabulary

Hertfordshire Constabulary

Humberside Police

Kent Police

Lancashire Constabulary

Leicestershire Police

Lincolnshire Police

Merseyside Police

Norfolk Constabulary

North Yorkshire Police

Northamptonshire Police

Northumbria Police

Nottinghamshire Police

South Yorkshire Police

Staffordshire Police

Suffolk Constabulary

Surrey Police

Sussex Police

Thames Valley Police

Warwickshire Police

West Mercia Police

West Midlands Police

West Yorkshire Police

Wiltshire Police

BY THE COURT

* This order was drawn by Ann Marie Smith (Associate) to whom all enquiries regarding this order should be made. When communicating with the Court please address correspondence to The Associate, Civil Appeals Office, Room E307, Royal Courts of Justice, Strand, London WC2A 2LL (DX 44456 Strand) and quote the Court of Appeal reference number. The Associate's telephone number is 0207 947 7183 and 0207 947 7856.

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
AMENDED UNDER THE SLIP RULE**

**Before: Mr Justice Cotter
On: 5th May 2023**

BETWEEN:



QB-2021-003576

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) MR ALEXANDER RODGER AND 139 OTHERS**

Defendants

ORDER

PENAL NOTICE

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

IMPORTANT NOTICE TO THE DEFENDANTS

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

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

FURTHER TO the Orders made in these proceedings by Bennathan J on 9 May 2022 (“**Bennathan Order**”) and 16 January 2023 (“**Costs Order**”) and by the Court of Appeal on 14 March 2023 (“**CoA Order**”)

AND UPON the Claimant’s application by Application Notice dated 13th April 2023 pursuant to the provisions at paragraph 16 of the **CoA Order**

AND UPON the Claimant 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 HEARING Counsel for the Claimants, Myriam Stacey KC and Michael Fry, and various Named Defendants in person at a hearing on 24 April 2023 (“**Review Hearing**”) and also after consideration of submissions lodged by /on behalf of Named Defendants after the hearing

AND FURTHER UPON the handing down of a judgment

IT IS ORDERED THAT:

Definitions

1. In this Order, the following defined terms shall apply:
 - a. “**Named Defendants**” means D2 to D140 whose names appear in the revised and renumbered Schedule 1 annexed to this Order to reflect the Order made at paragraph 7.
 - b. “**Defendants**” refers to all defendants.
 - c. “**24 Defendants**” means those defendants defined in the Costs Order against whom costs were ordered in favour of the Claimant.

- d. **“109 Defendants”** means those defendants defined in the Costs Order as those listed in Schedule 1 of the Bennathan Order as D2 to D134 except for the 24 Defendants.
- e. **“April 2023 Removed Defendants”** means those defendants removed from the Schedule of Defendants as provided for by order in paragraph 2(a) of this Order.
- f. **“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.

- g. “**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/>.

Amendments to the Claim

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 Named Defendants: D6, D9, D12, D29, D63, D64, D69, D105, D108, D111, D115 and D128
- b. Addition of Named Defendants:
- i. D135: Marcus Decker
 - ii. D136: Morgan Trowland
 - iii. D137: Abigail Percy Radcliff
 - iv. D138: Alexander Wilcox
 - v. D139: Cressida Gethian
 - vi. D140: Emma Mani
- c. The addition of the following wording to the Schedule of Defendants:
- “For the avoidance of doubt, any person who has been a defendant in these proceedings, or who has given undertakings to the Claimant, may nevertheless become Defendant 1 as a person unknown if they commit any of the prohibited acts.”*

Injunction in force

3. By way of variation of the **Bennathan order** and the **CoA** order and with immediate effect and until 23.59 hrs on 10th May 2024 the Defendants (save for Defendant 119 and if the order is discharged against them Defendants 116 and 133) 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

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.
8. 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
9. Service in accordance with paragraphs 7 and 8 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.
10. Further, without prejudice to paragraphs 6, 8 and 9 , while 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

11. Until further order and 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.
12. 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.
13. The Claimant has until 4.00pm on 5th June 2023 to file, and serve on the First Defendant in accordance with paragraph 5(a) (i) and (iv) above, and the Police Representative Assistant Chief Constable in accordance with paragraph 15, written submissions as to whether/on what basis the court should continue to make the order at paragraphs 11 and 12 ; such submissions (if filed and served) to include addressing the power of the Court to make such an order in respect of confidential data/information (including material not yet in existence) and the inability of any person arrested to challenge the provision of information
14. Until further Order, the postal address and/or address for service of any person who is added as a 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.
15. The Claimant is to serve this order on the Police Representative Assistant Chief Constable Owen Weatherill (owen.weatherill@npocc.police.uk), by email only.

Further Directions

16. The **Bennathan order** and the **CoA** order are discharged with immediate effect as against Virginia Morris, Defendant 119.
17. Unless the Claimant files and serves a statement (verified) as to the basis upon which Rebecca Locker (Defendant 116) and Giovanna Lewis (Defendant 133) have been properly joined as named Defendants by 4.00pm on 19th May 2023 the **Bennathan order** and the **CoA** order will be discharged against them as at that time without further order. In the event that a statement is served the Court will consider further directions to resolve any issue arising. If either Defendant does not wish to further challenge the making of the order against them (for example because of potential costs consequences) the Claimant and the Court should be notified forthwith and the order will not be discharged under this paragraph.
18. Any named Defendant has permission to file with the Court, and serve on the Claimant through its solicitors (using the details below), a signed undertaking in the form at schedule 3 by 4.00pm on the 22nd May 2023. As soon as practicable after that date the Court will consider the removal as a Named Defendant of any person who has signed the undertaking.
19. Unless the Court is notified that no hearing is required (as no continuation of the order is sought) this order will be reconsidered at a hearing on Friday 26th April 2024 at 10.30 am at the Royal Courts of Justice, London to determine whether there is a continued threat which justifies continuation of this Order. It will be the Claimant's responsibility to place details of the hearing on the Injunction Website. No further application shall be required.
20. 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 23 below 48 hours before making such application of the nature of such application and the basis for it.
21. 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.
22. The Claimant has liberty to apply to extend, vary or discharge this Order, or for further directions.

Costs

23. Save for Defendant 119 (and if the order is discharged against them Defendants 116 and 133) each of the 109 Defendants shall pay the Claimant's costs in these proceedings incurred up to and including 12 May 2022 on the standard basis but not exceeding £4,360 for each of them, to be assessed if not agreed.
24. Save for Defendant 119 (and if the order is discharged against them Defendants 116 and 133) each of the 109 Defendants shall pay the Claimant £1,500 costs on account under CPR 42.2.8 by 4pm on Friday 9th June 2023.
25. Each of the Defendants, except for the April 2023 Removed Defendants, Defendant 119 (and if the order is discharged against them Defendants 116 and 133) shall pay the Claimant's costs of the Review Hearing on the standard basis, to be assessed if not agreed, such costs to be divided on a pro-rata basis.

Communications with the Claimant

26. 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

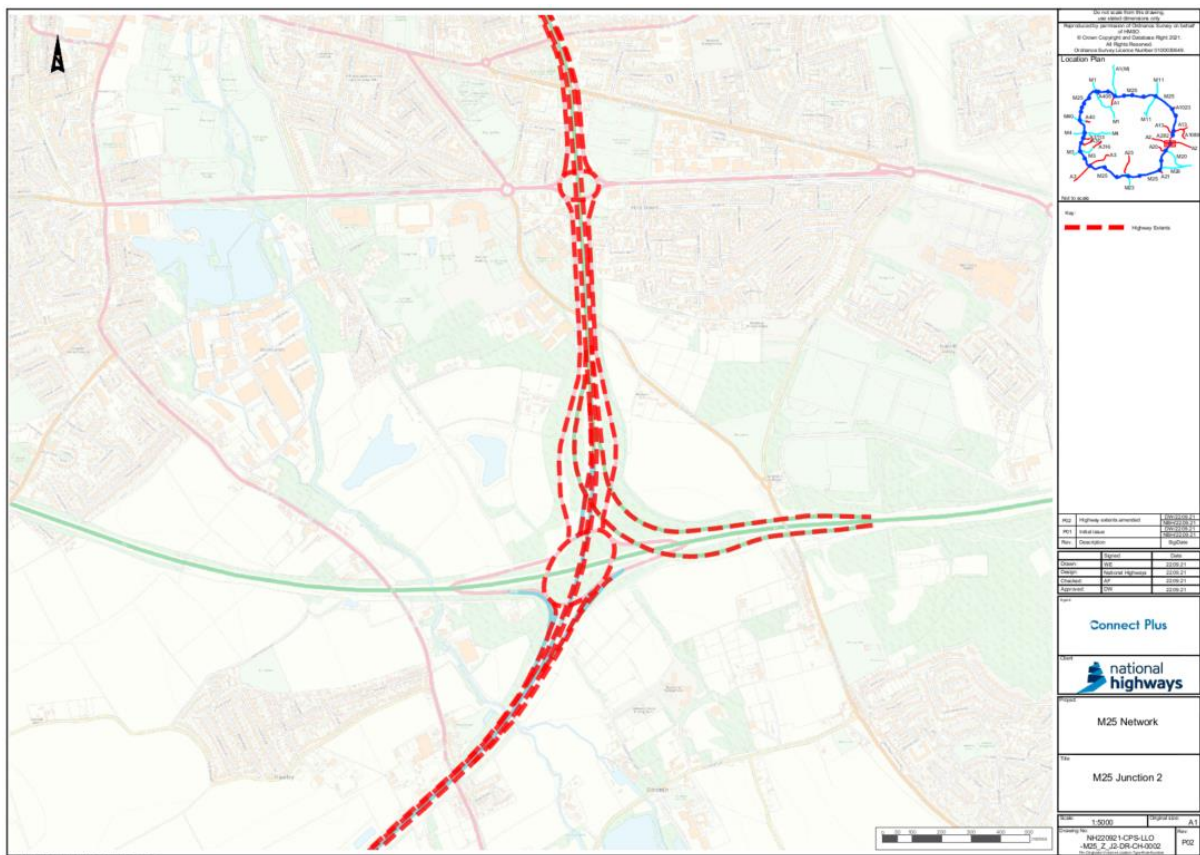
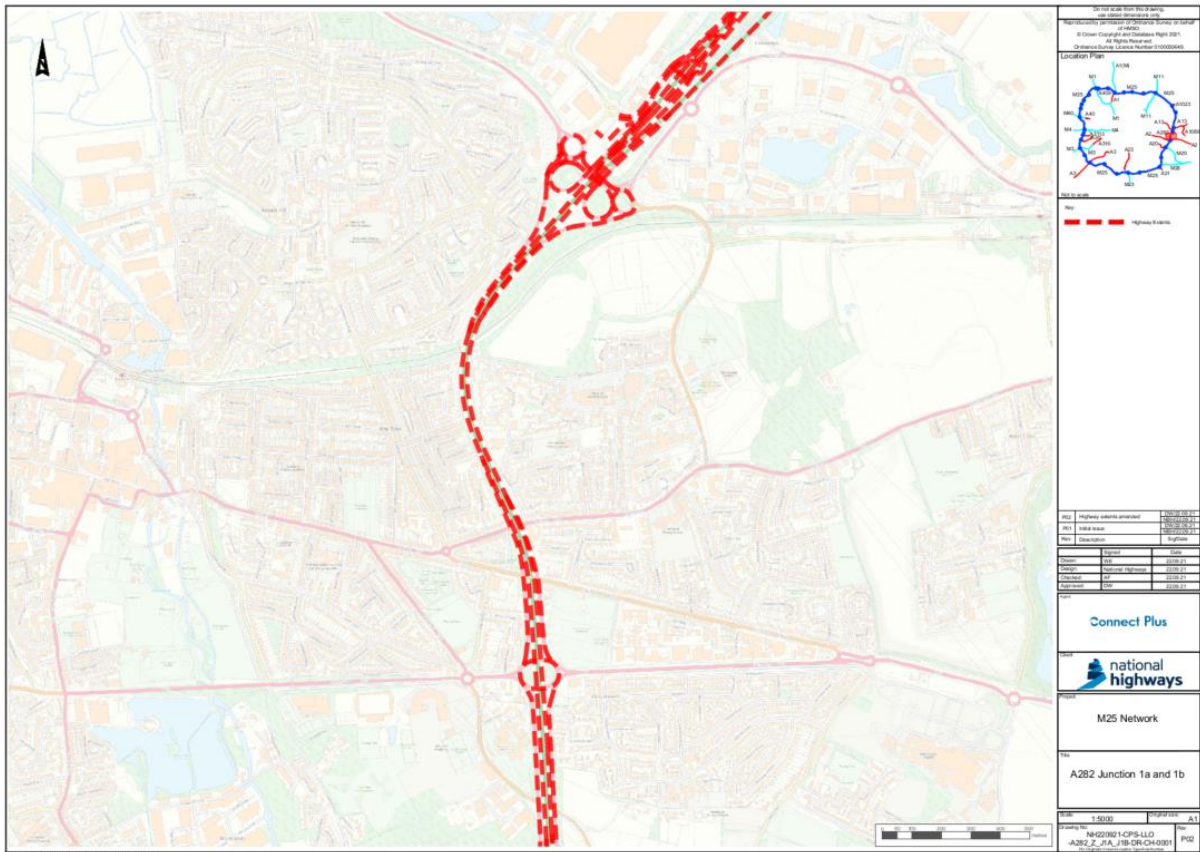
E: petra.billing@dlapiper.com and rob.shaw@dlapiper.com

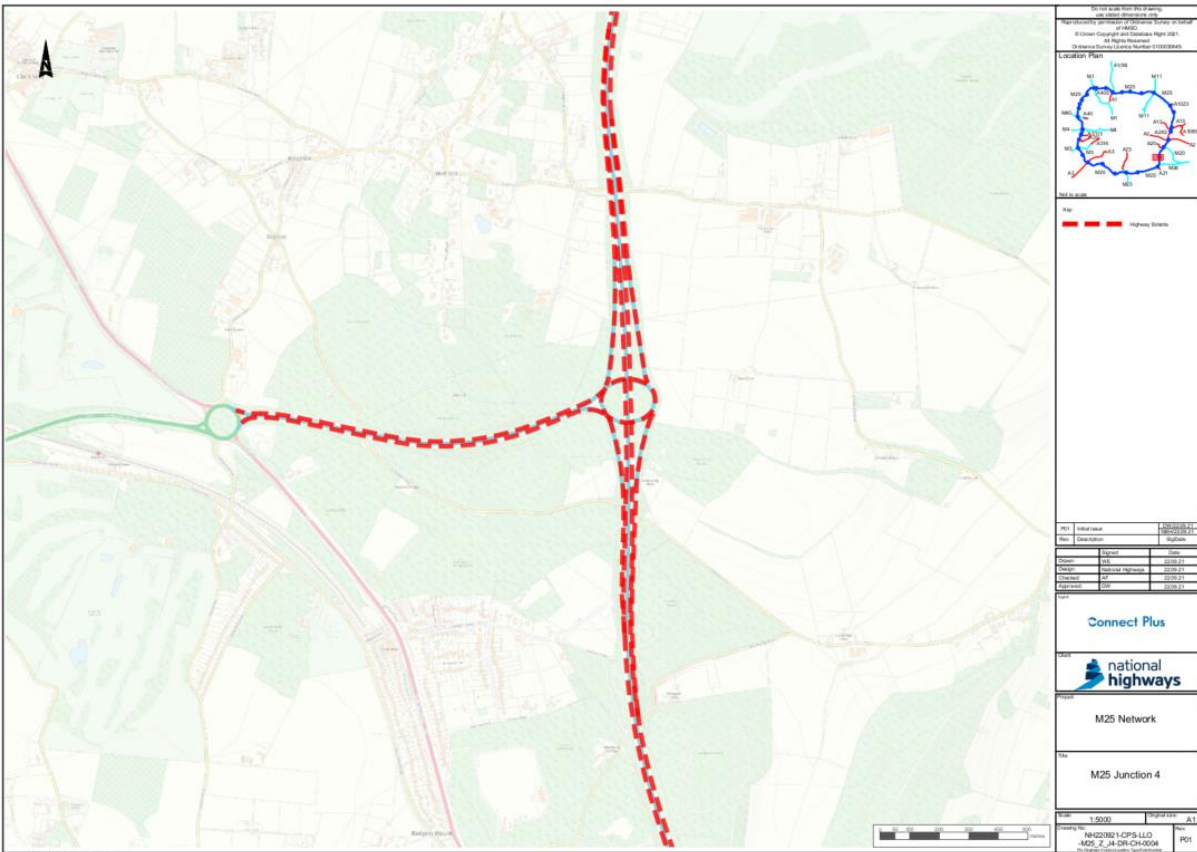
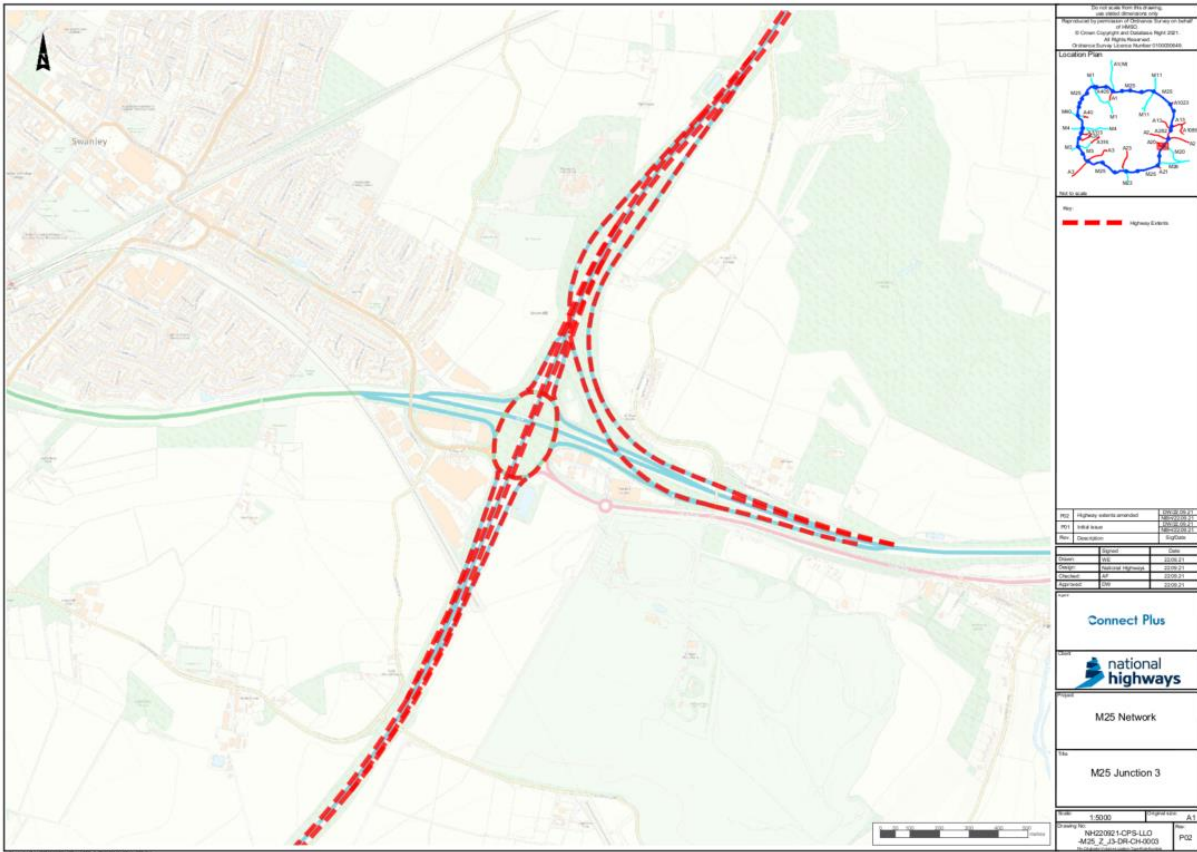
T: 0207 796 6047 / 0114 283 3312

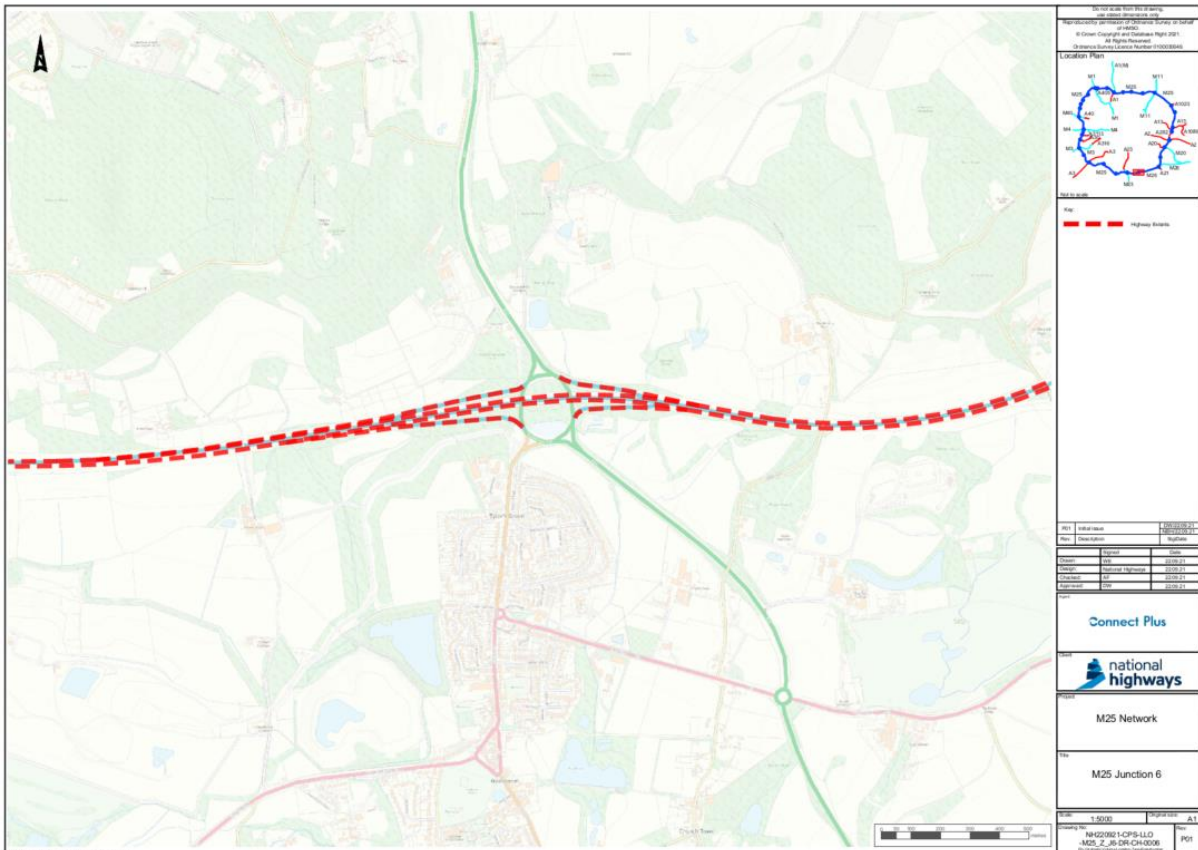
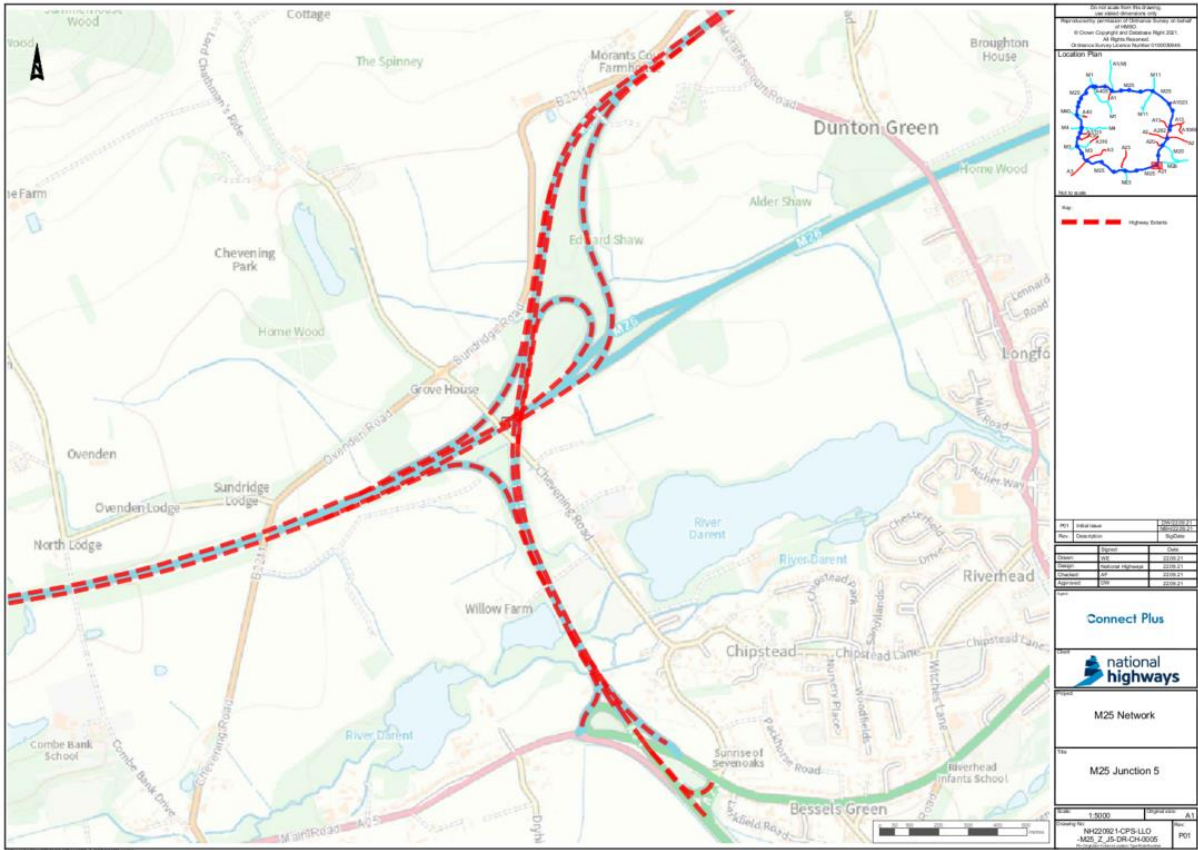
BY THE COURT

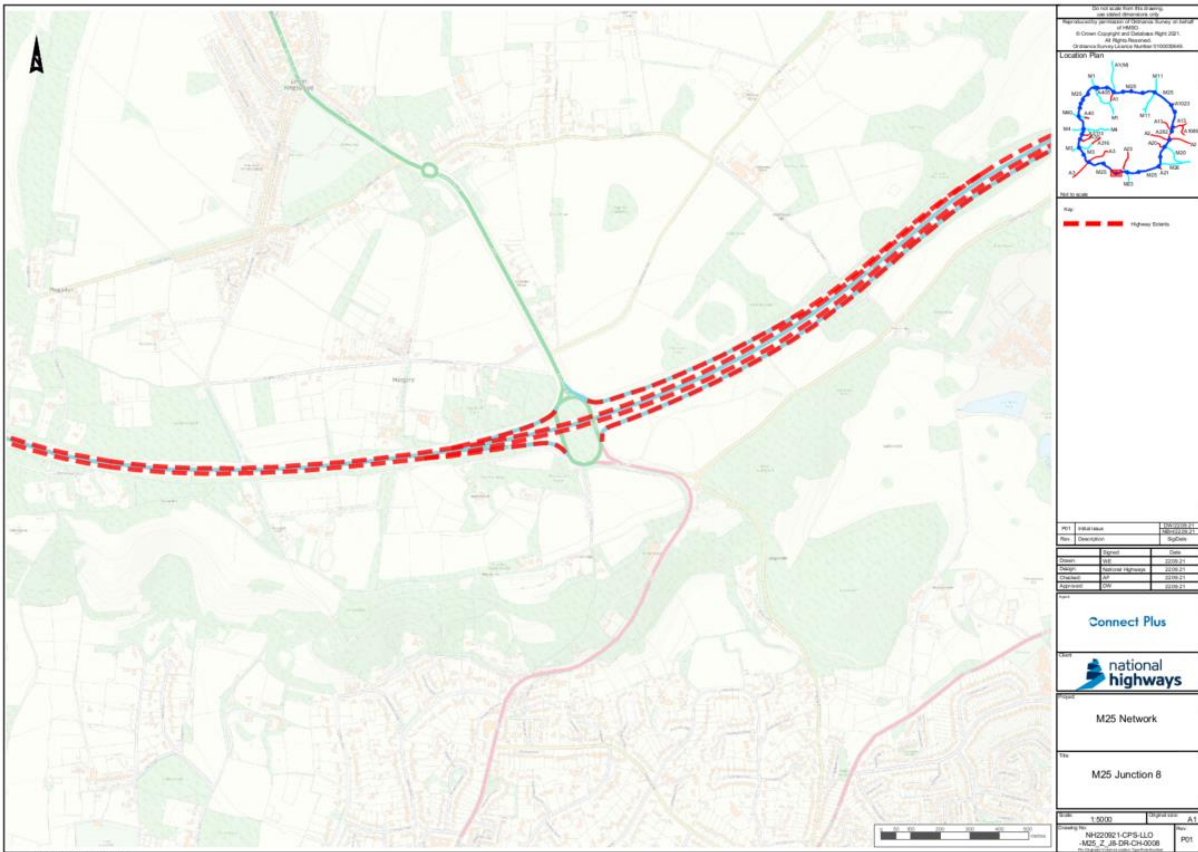
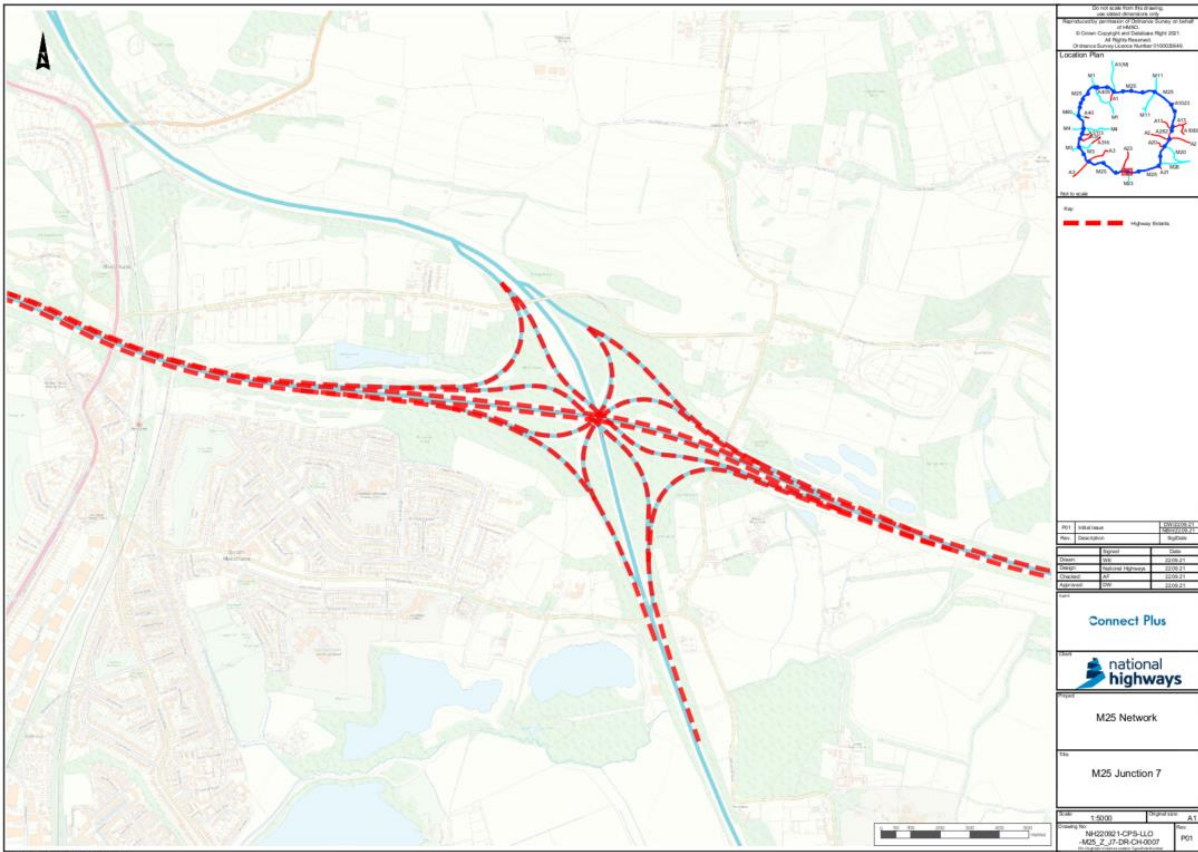
MADE ON 5th May 2023

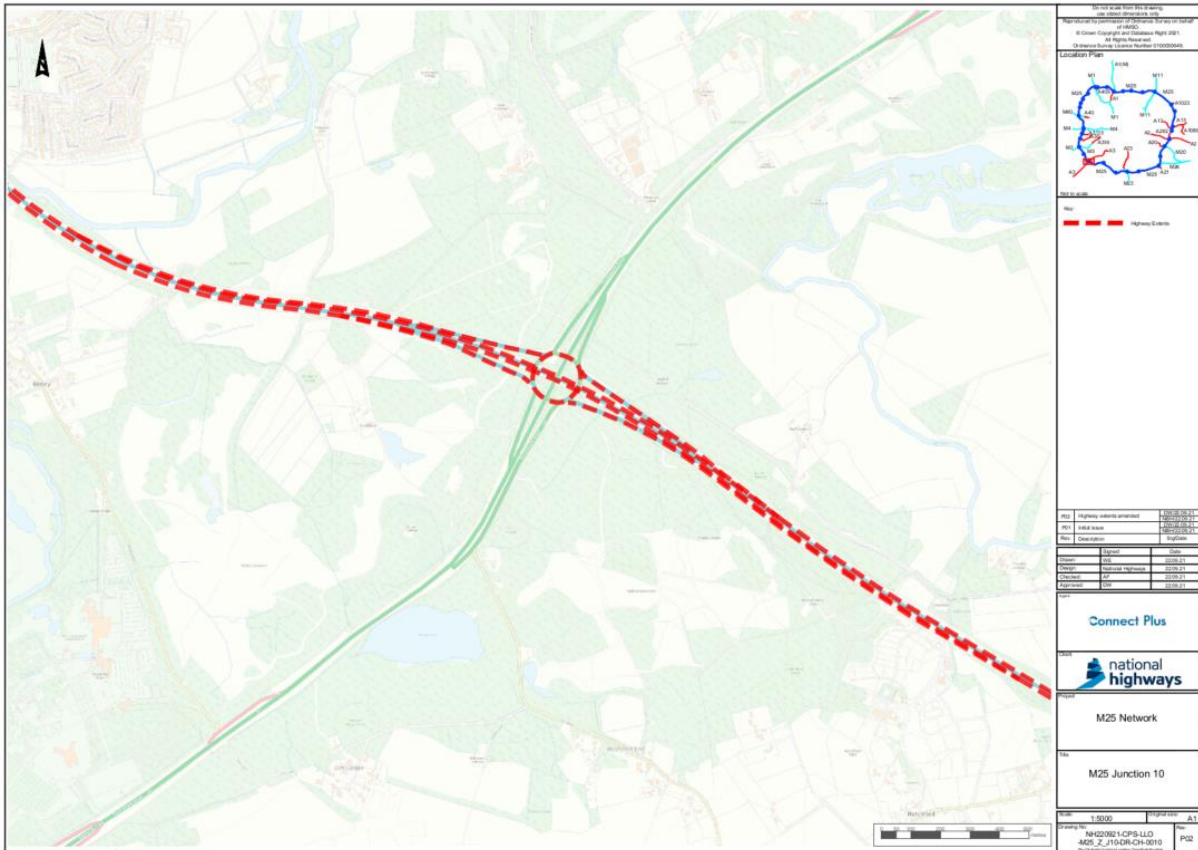
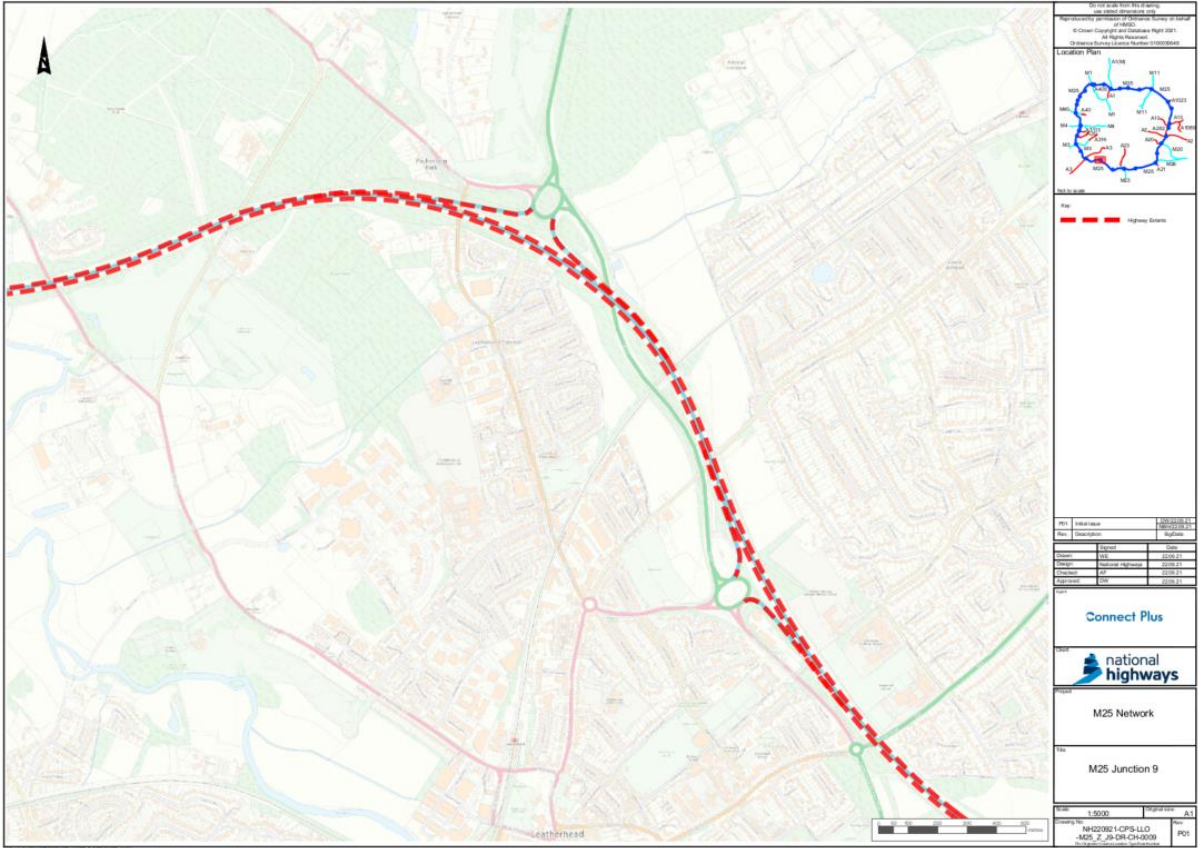
APPENDIX 1

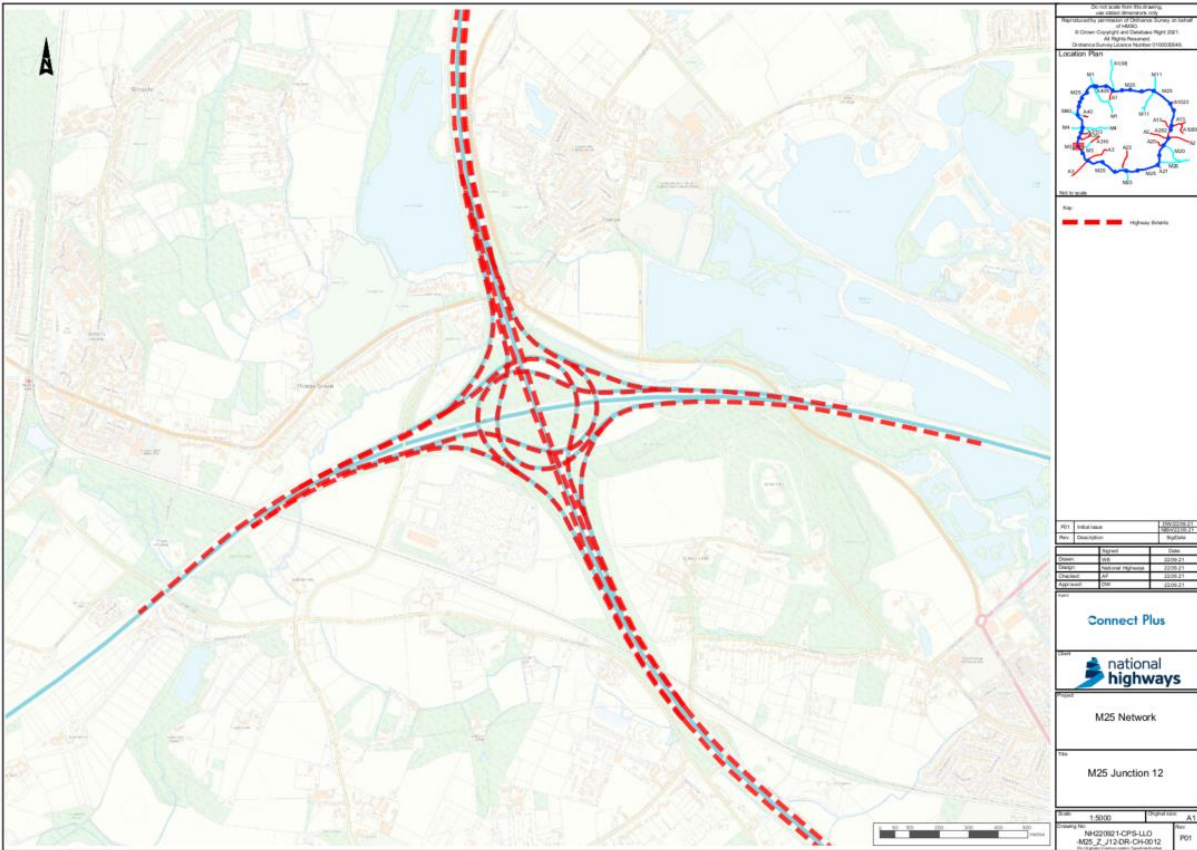
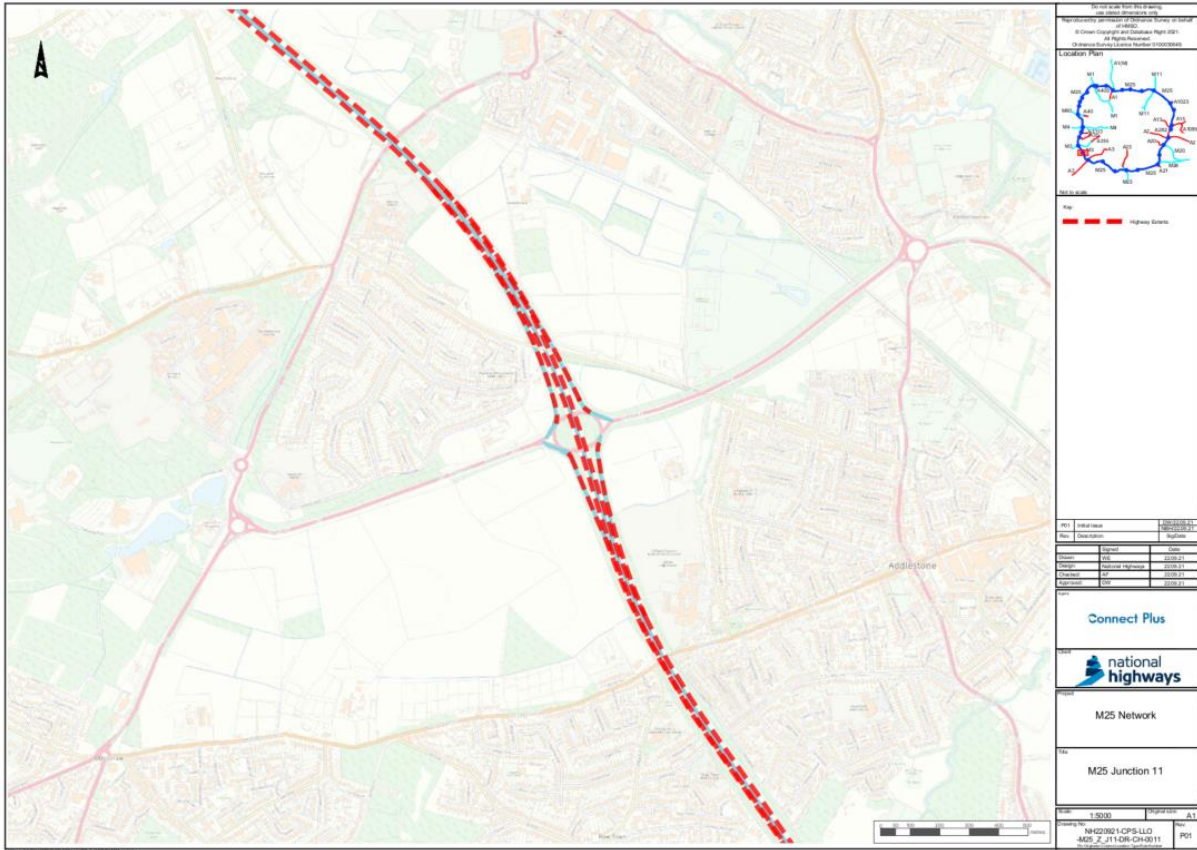




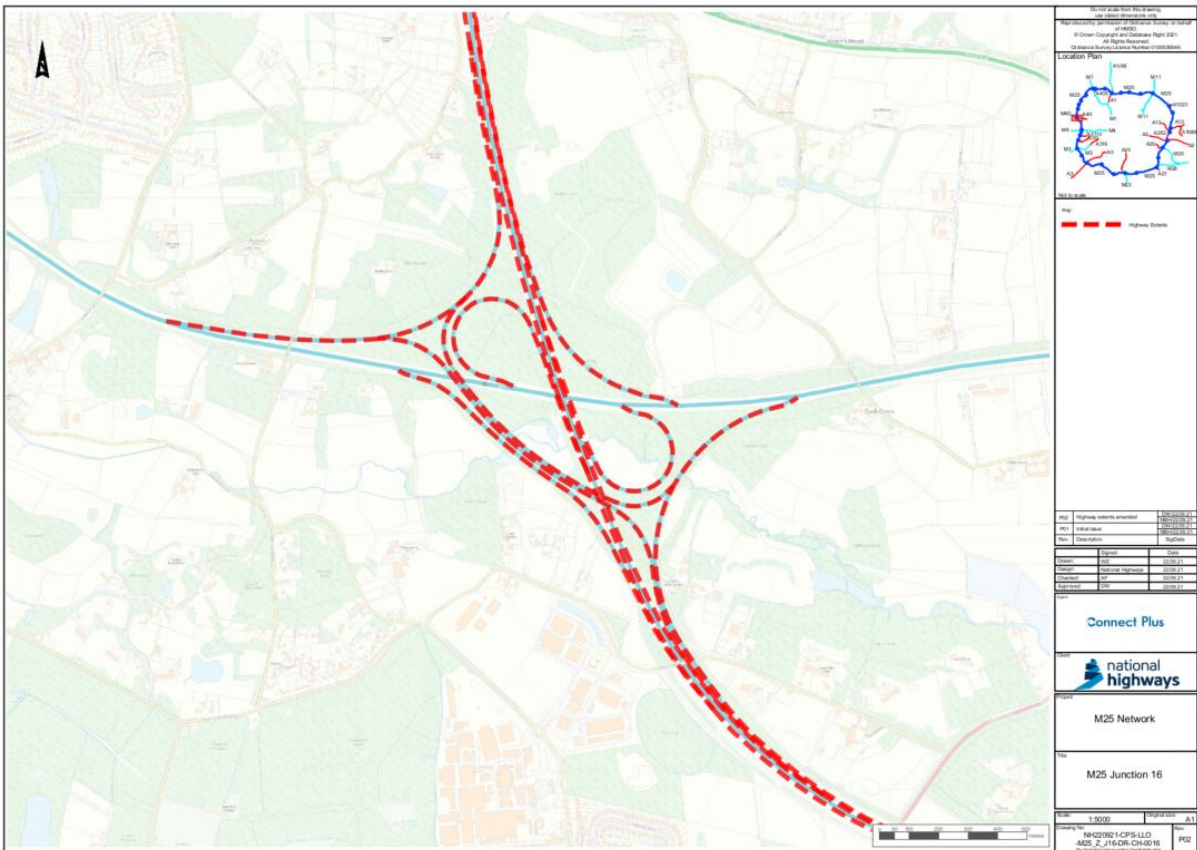
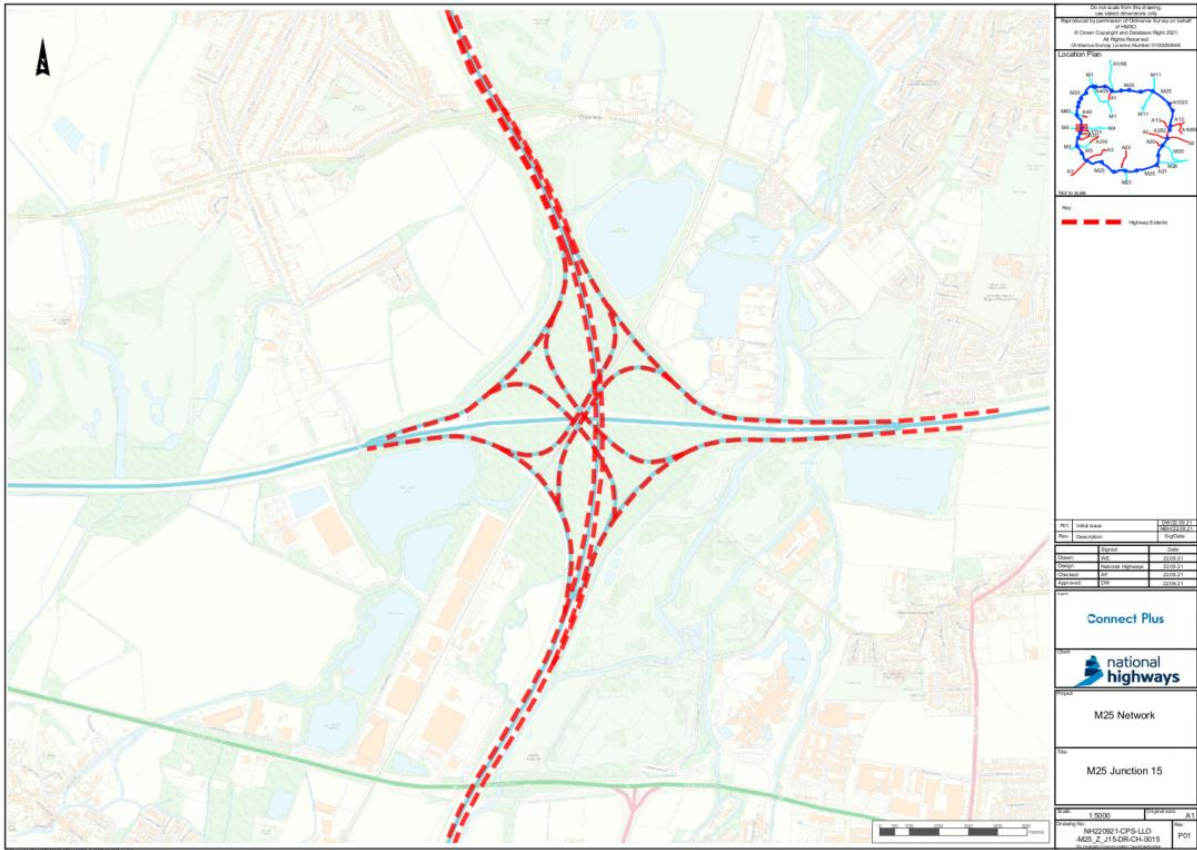


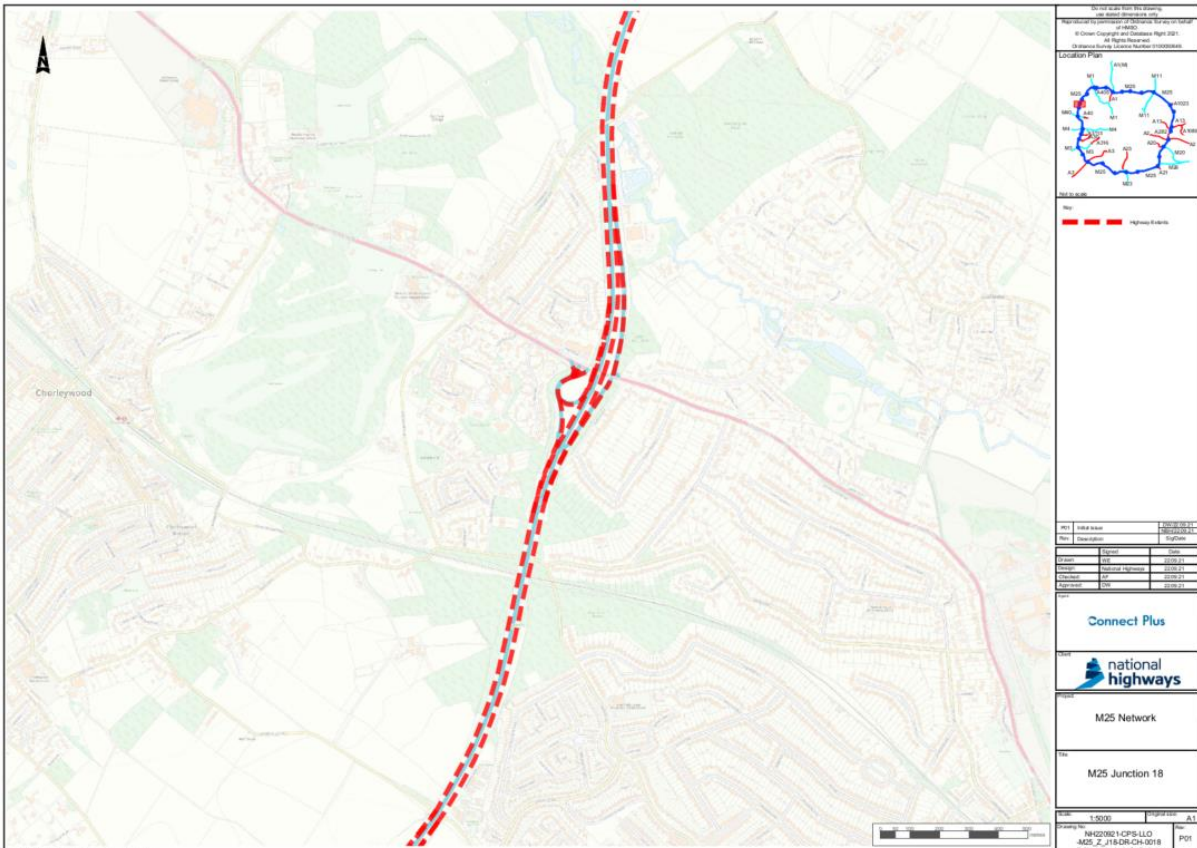
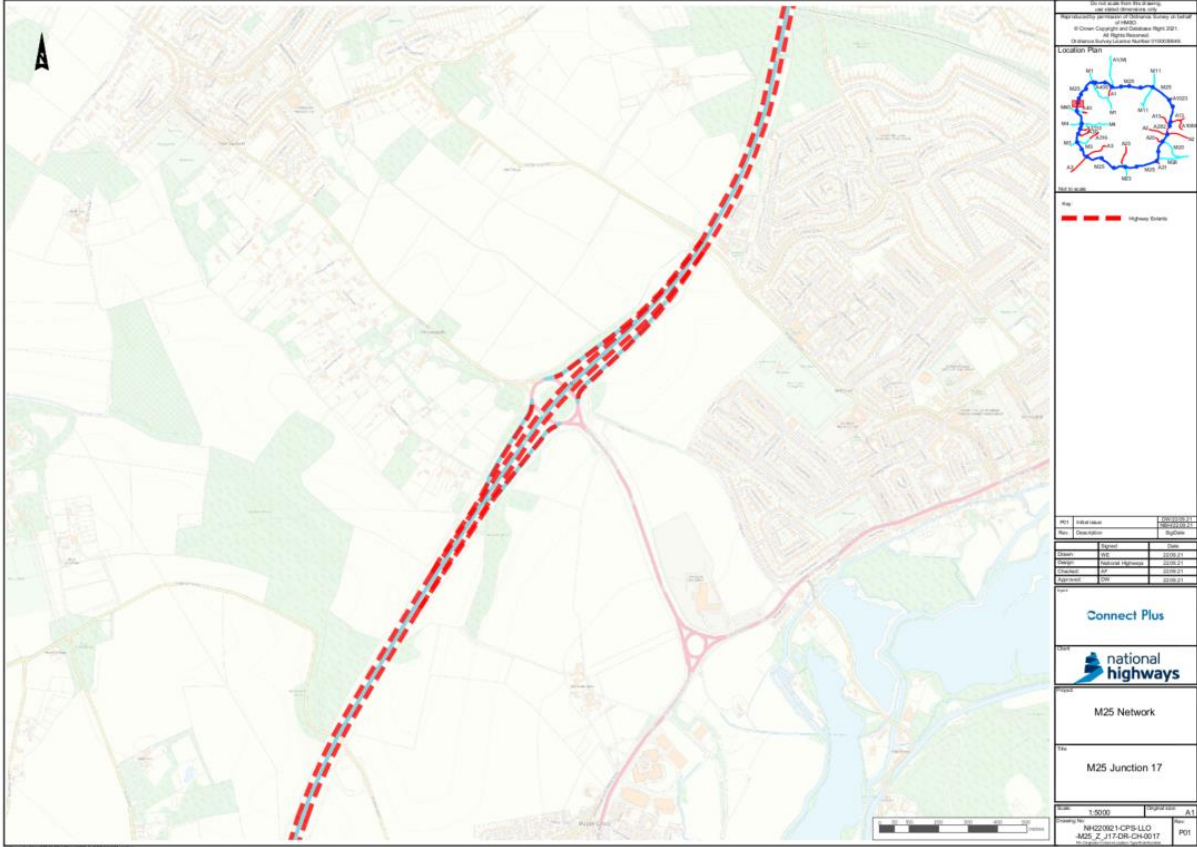


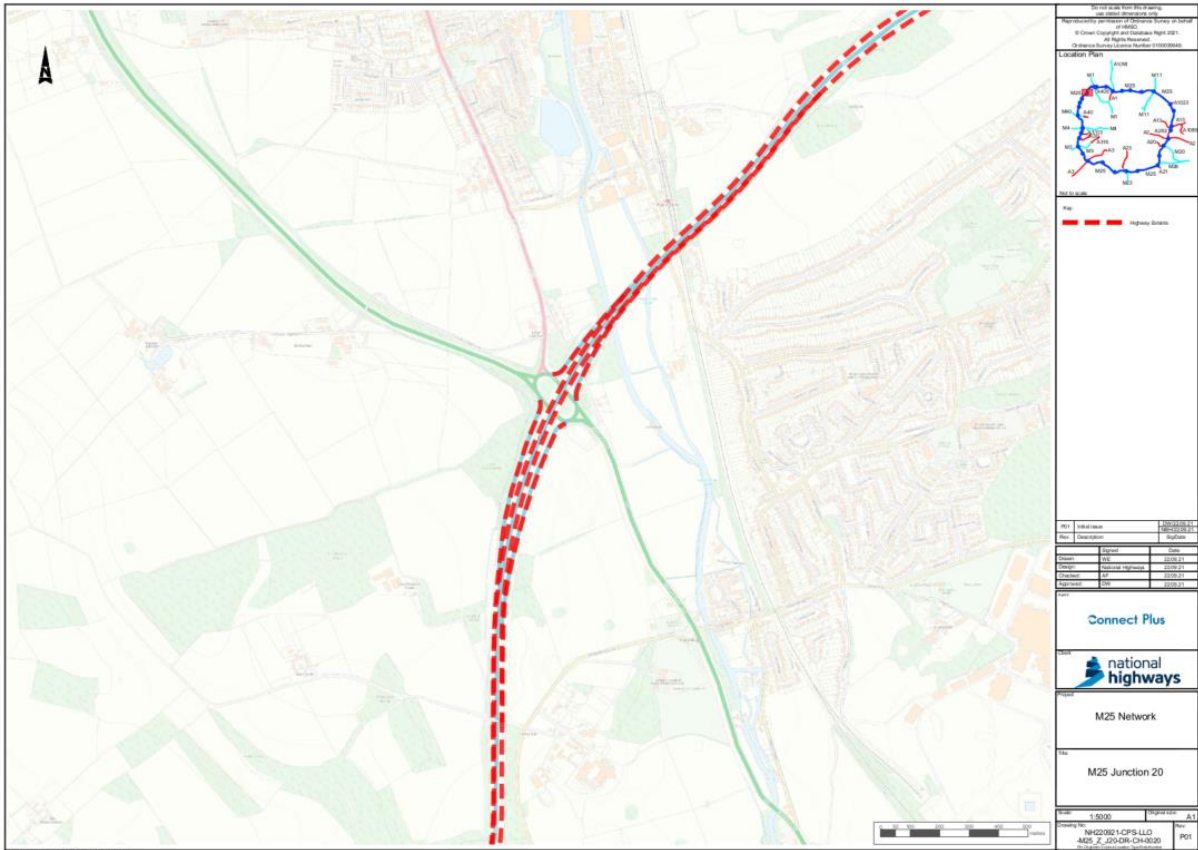
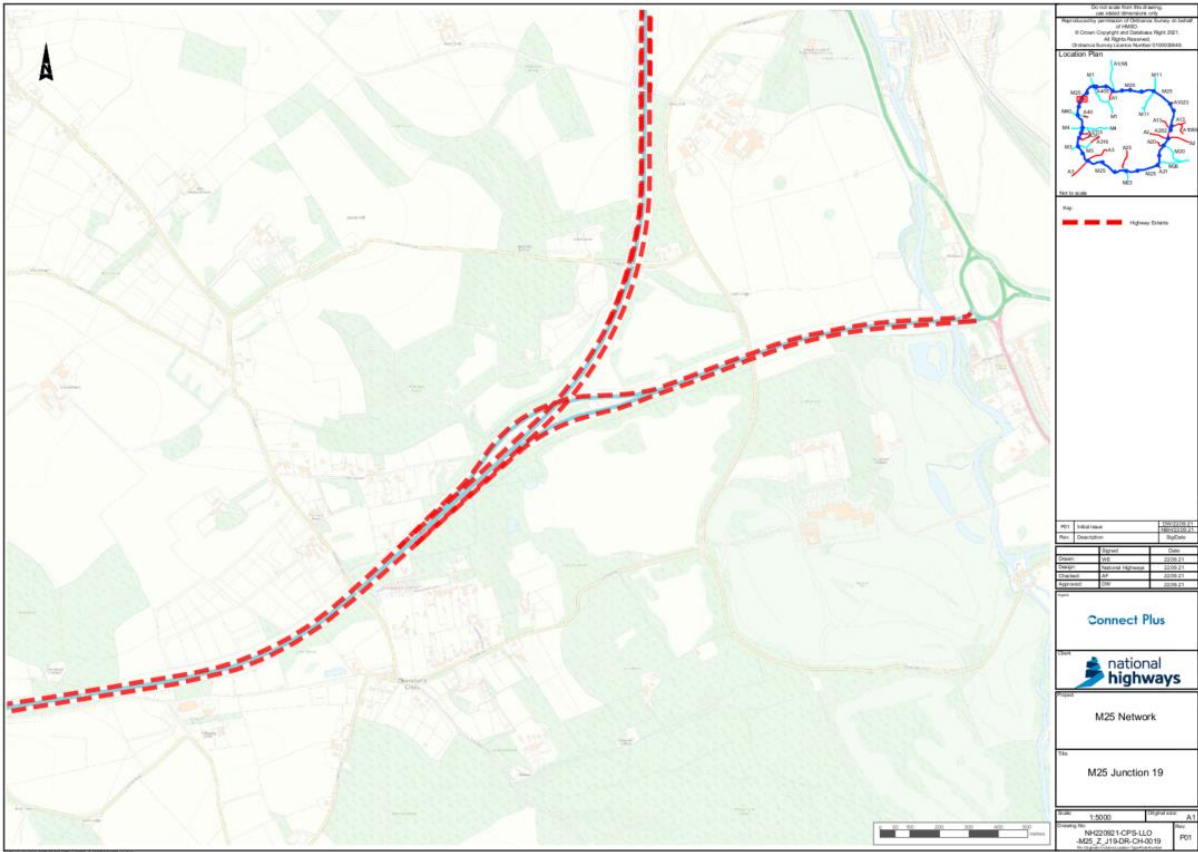


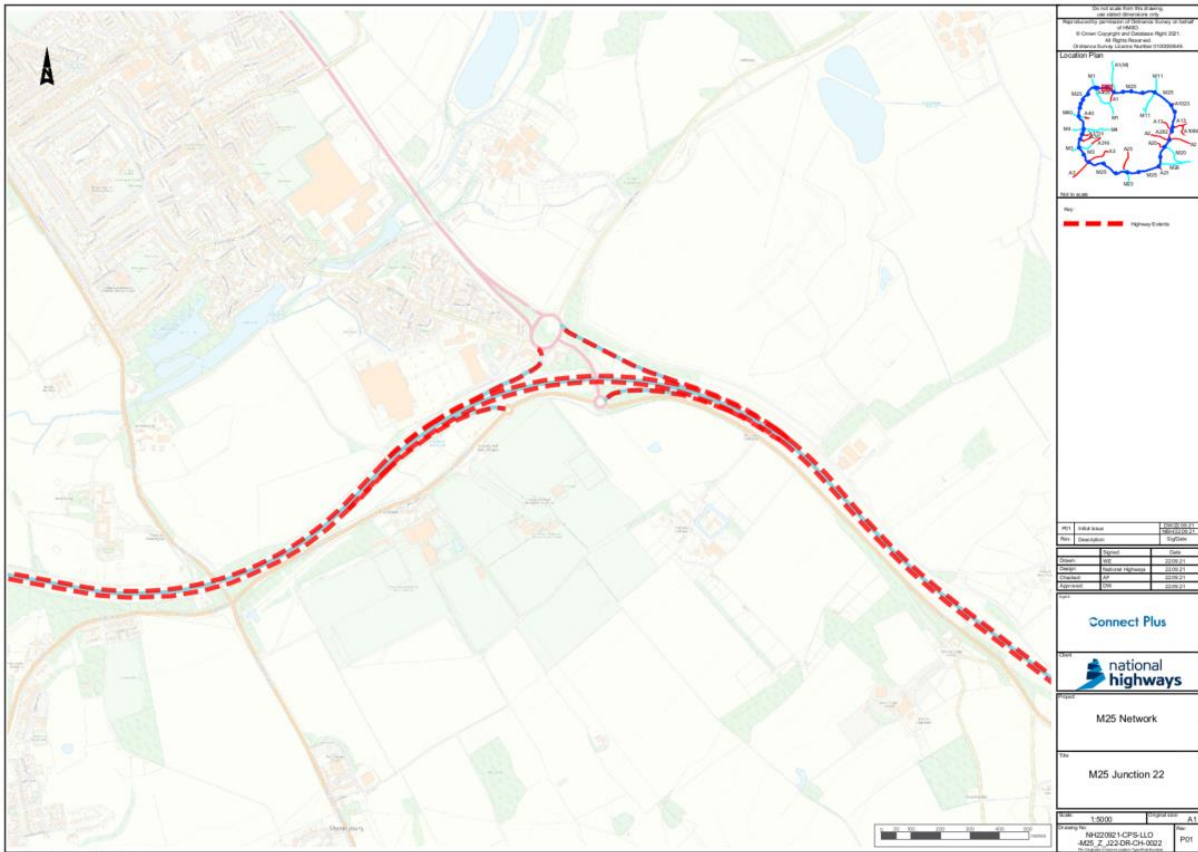
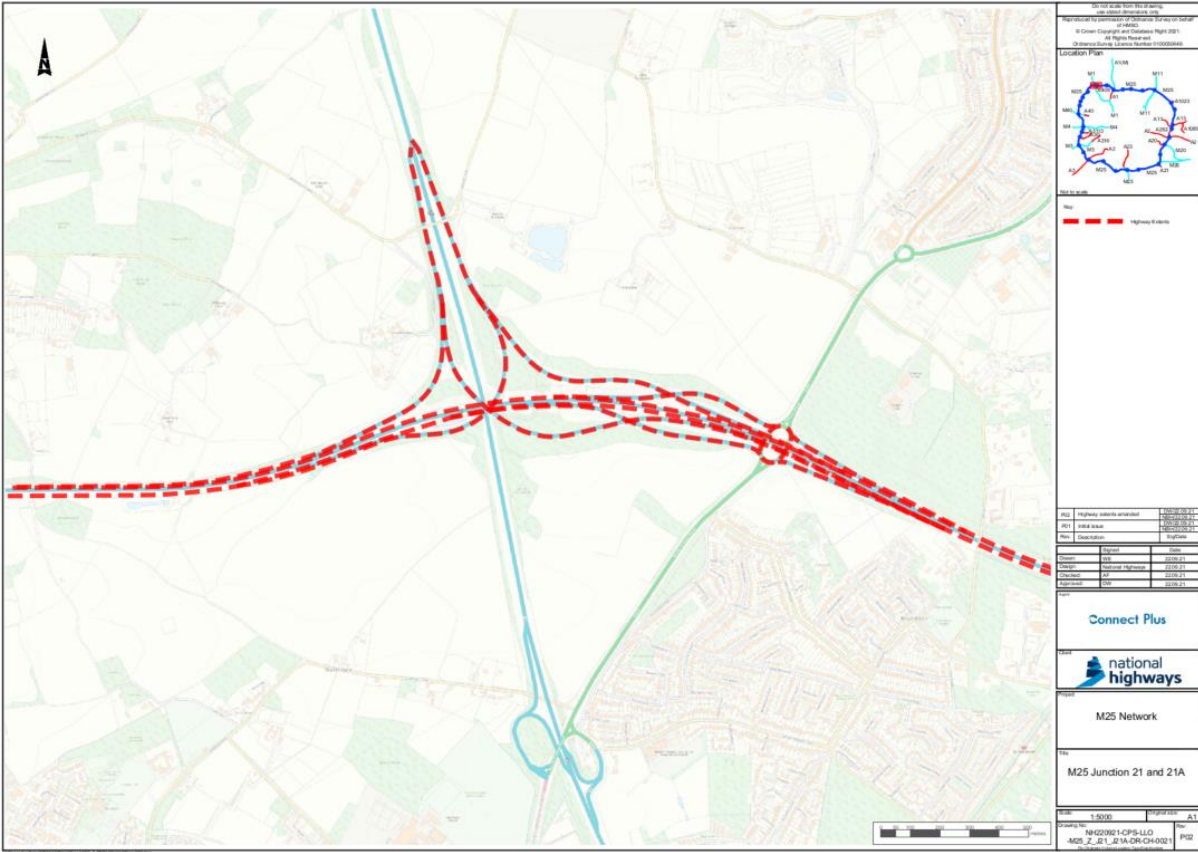


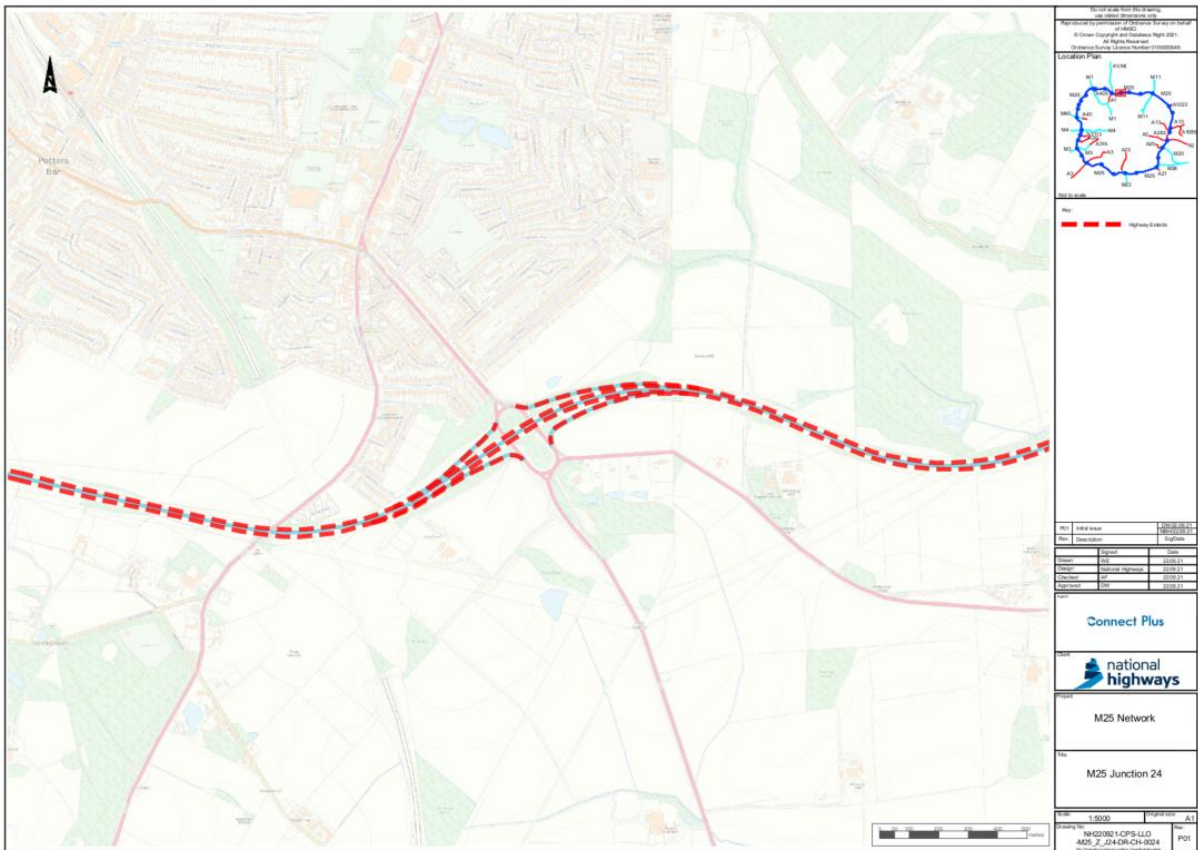
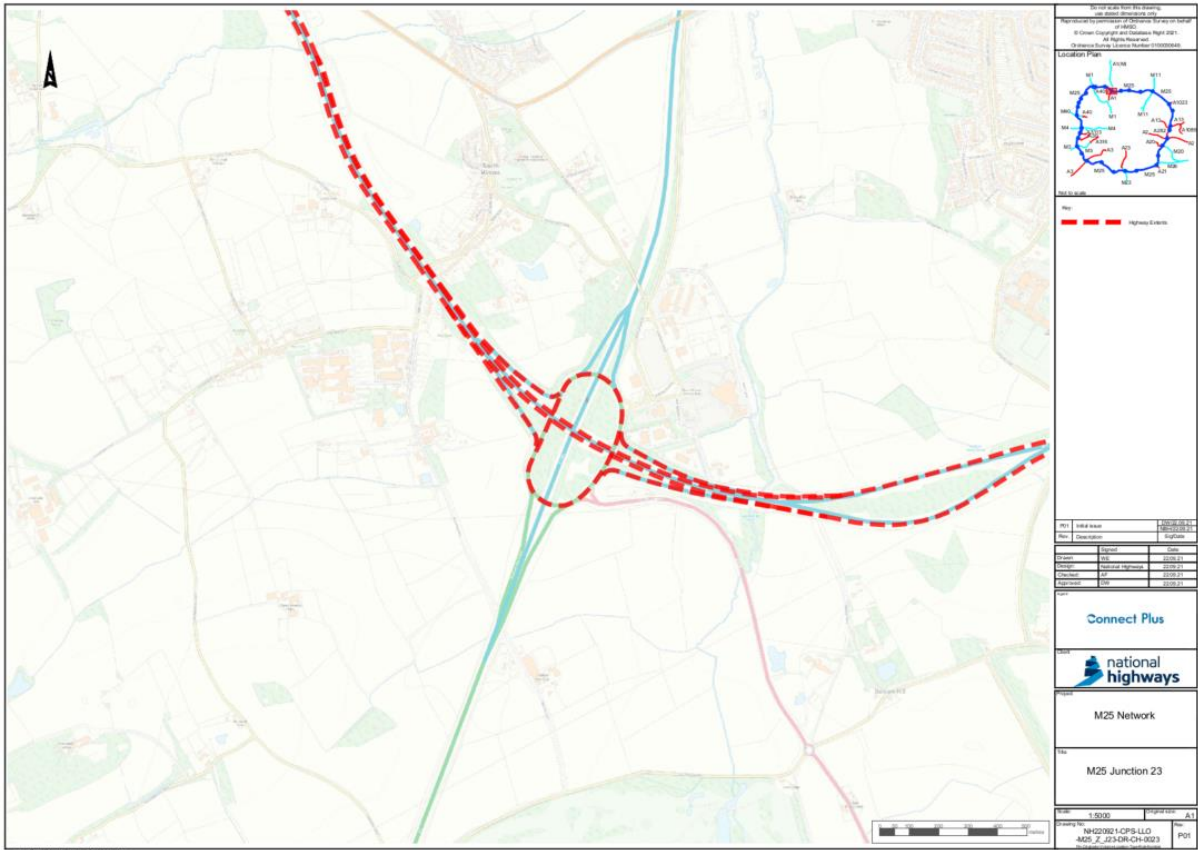


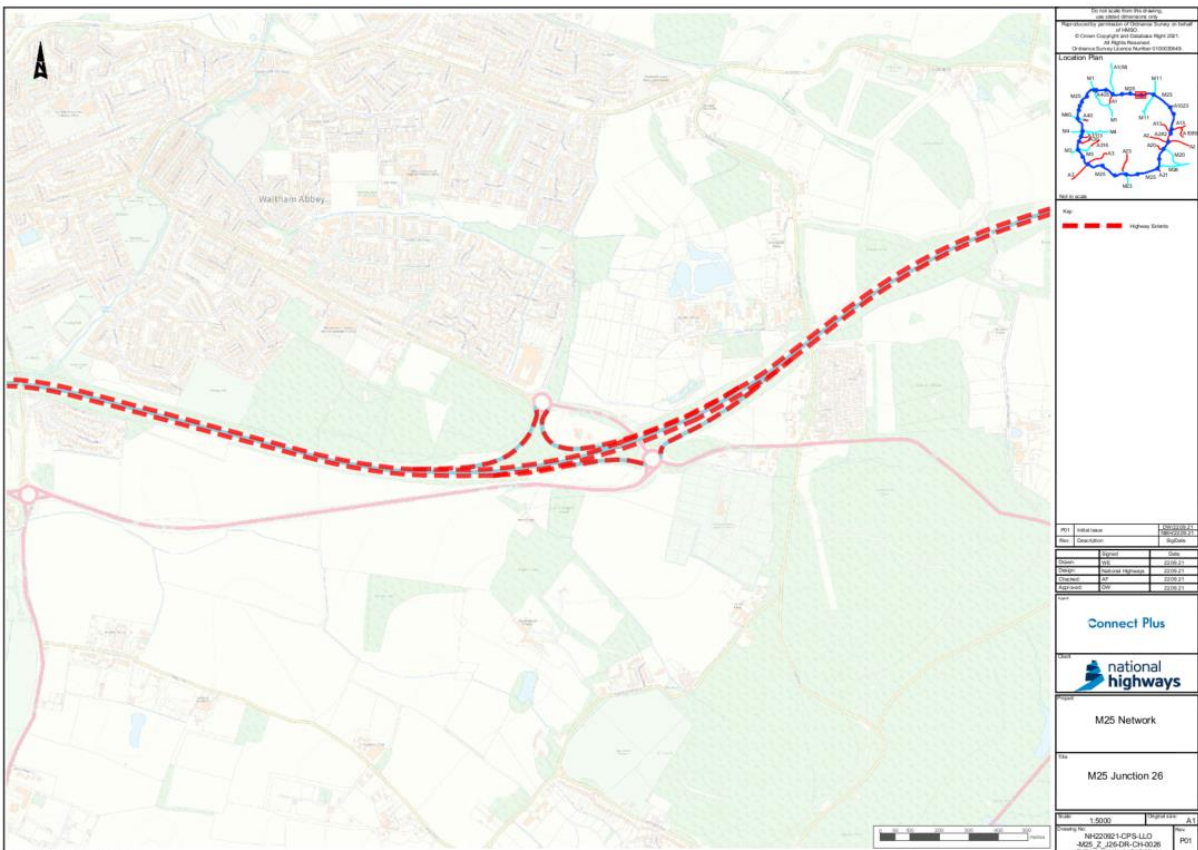
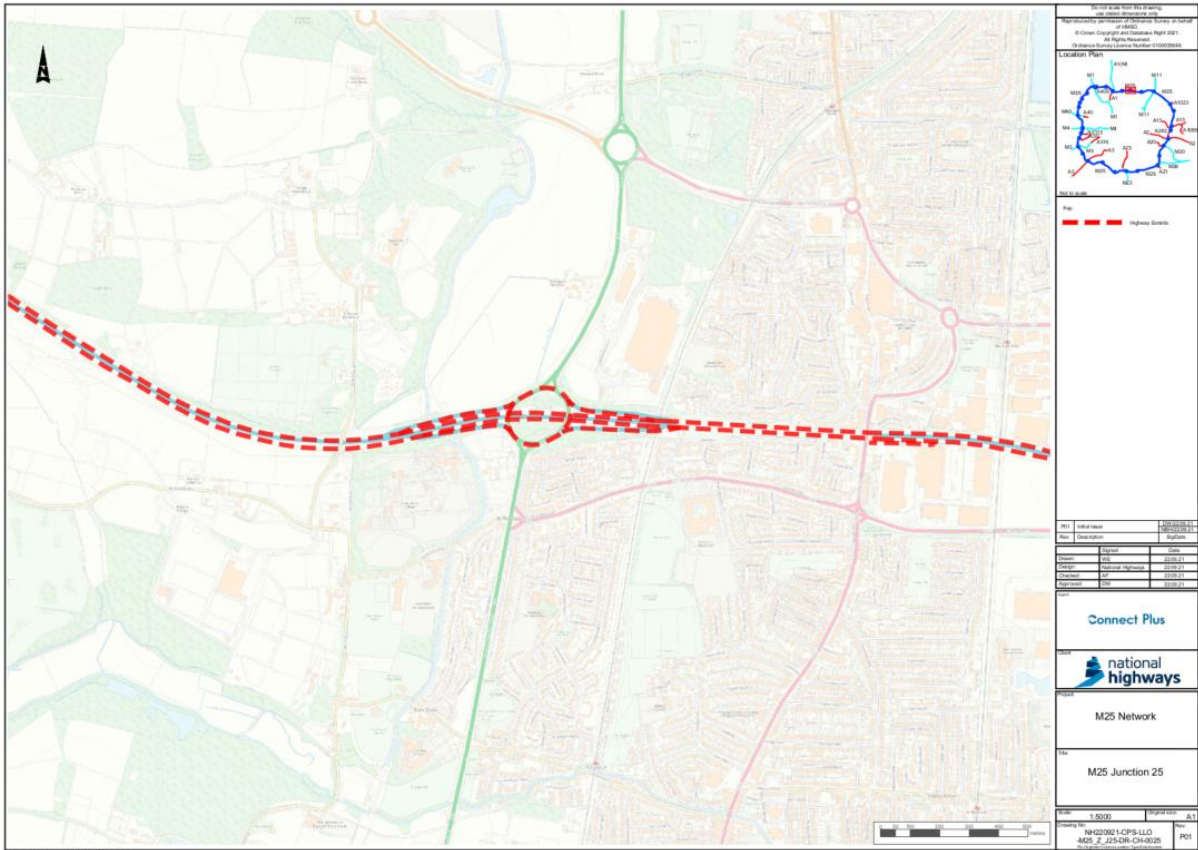


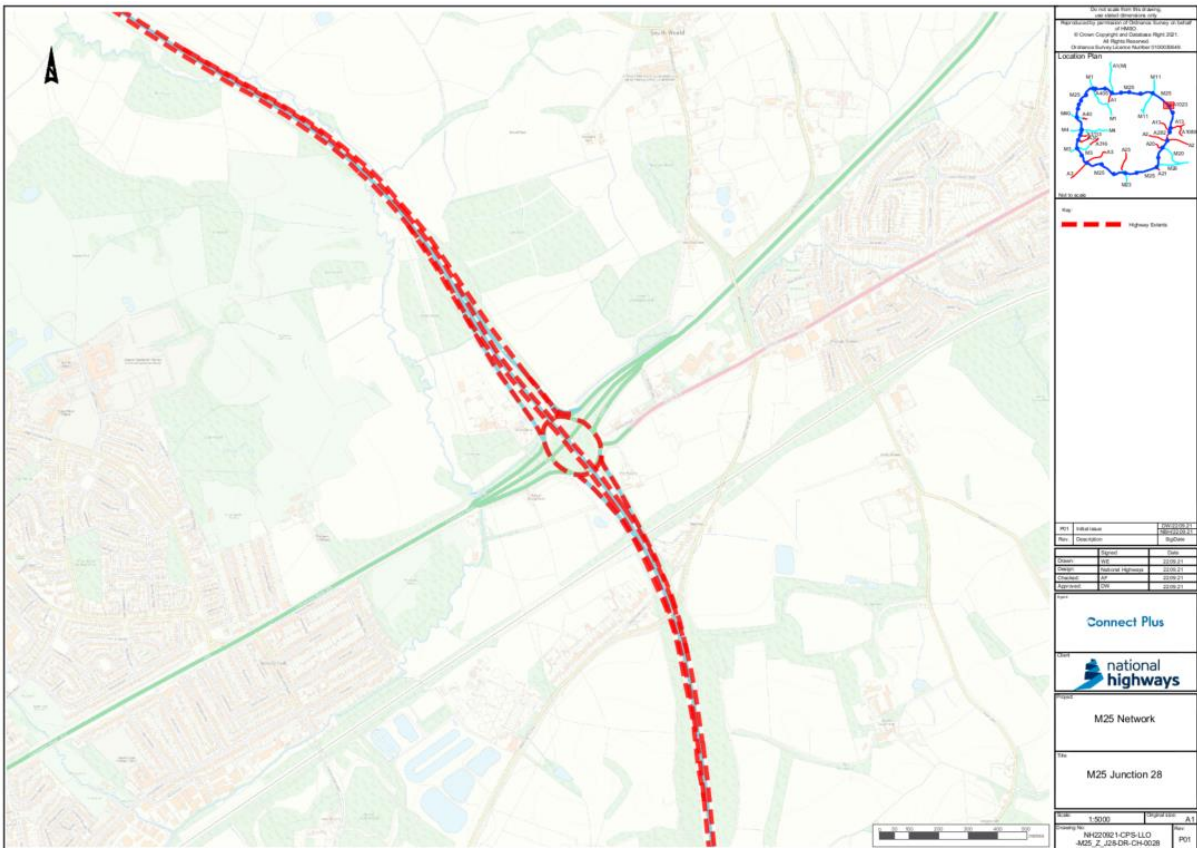
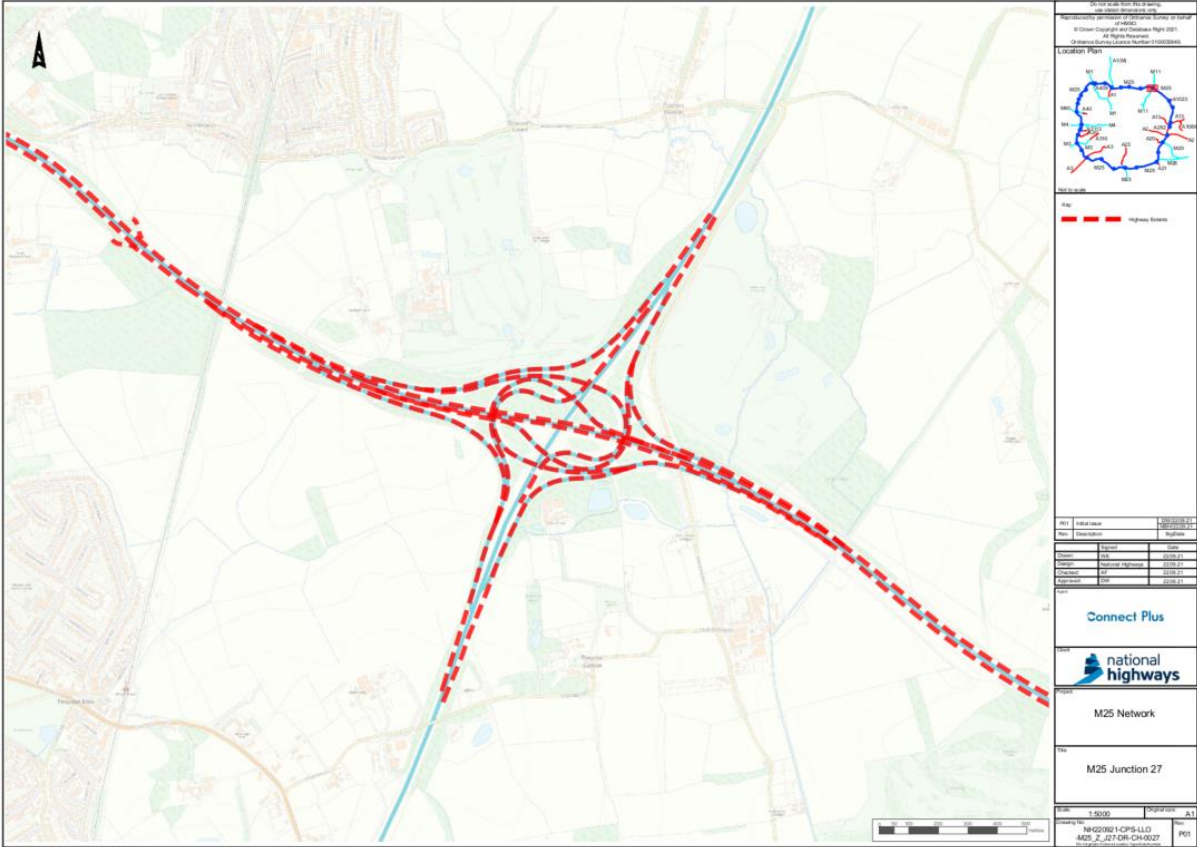


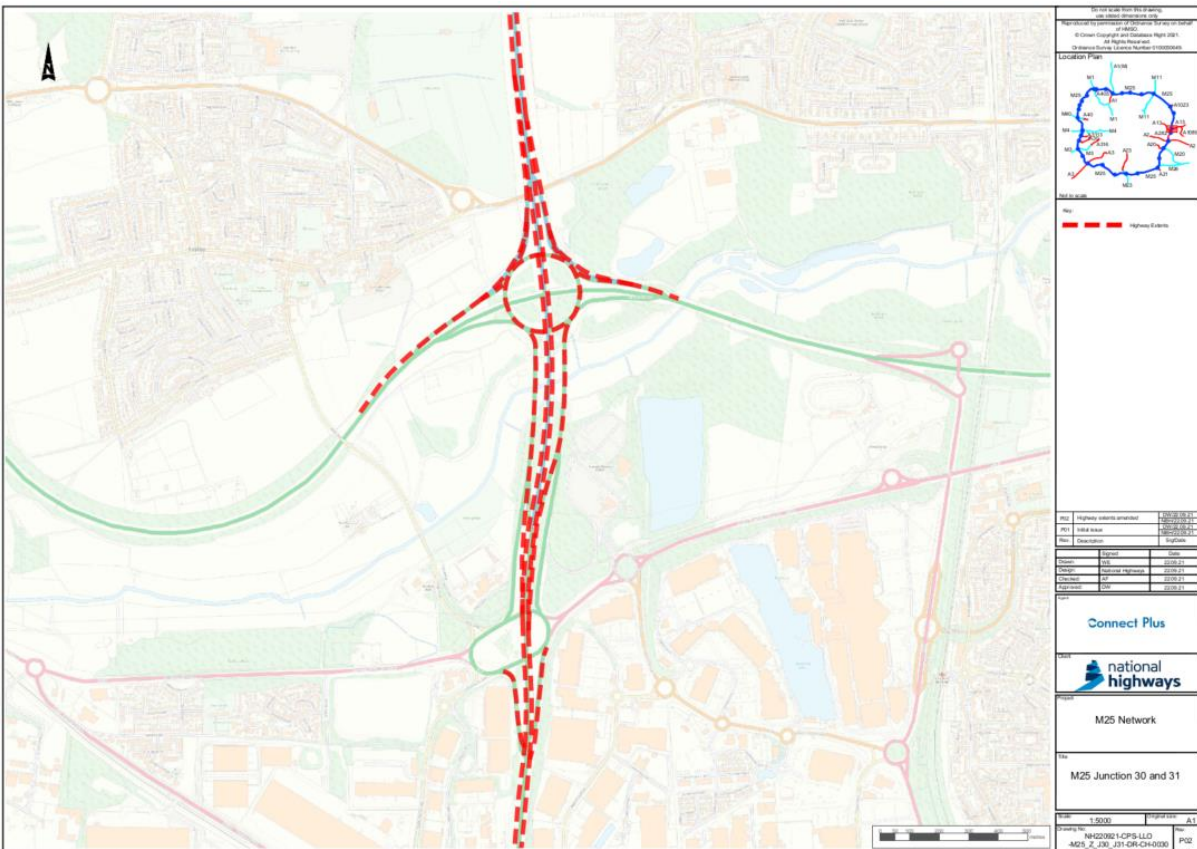
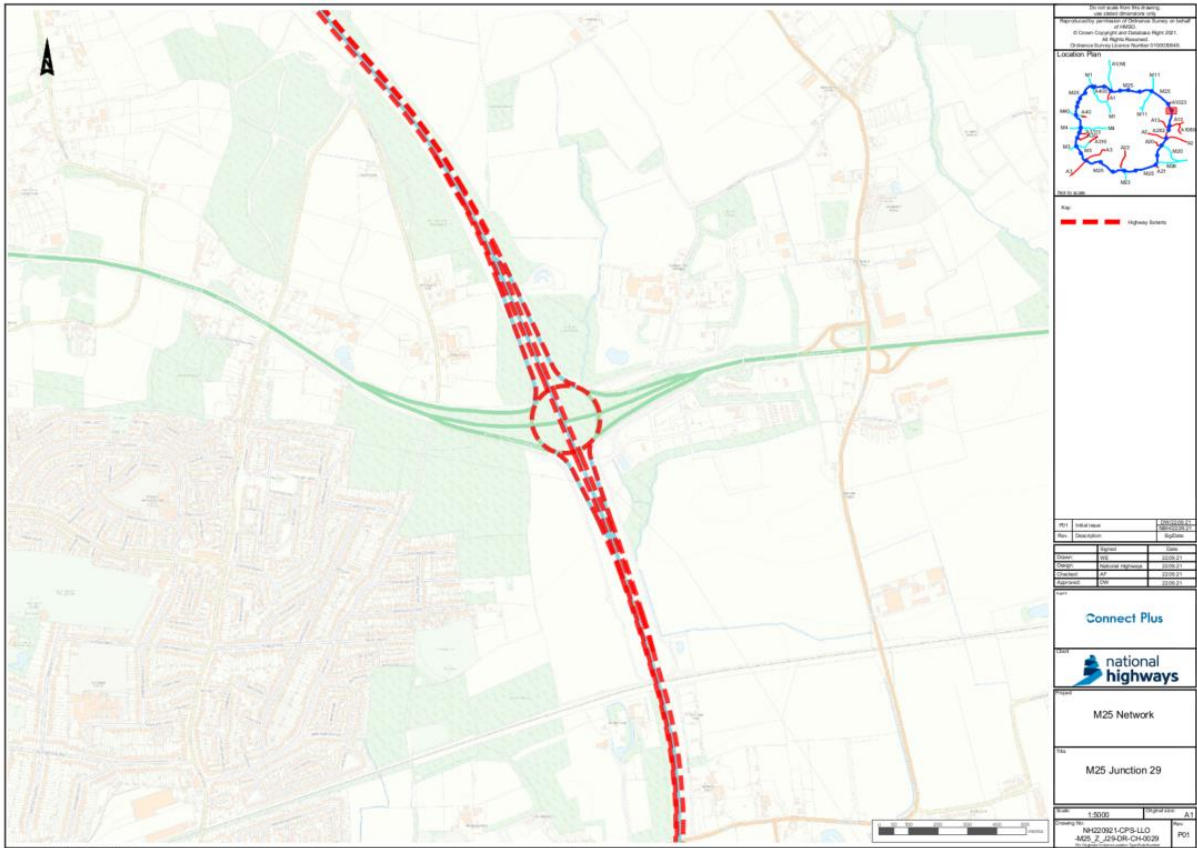






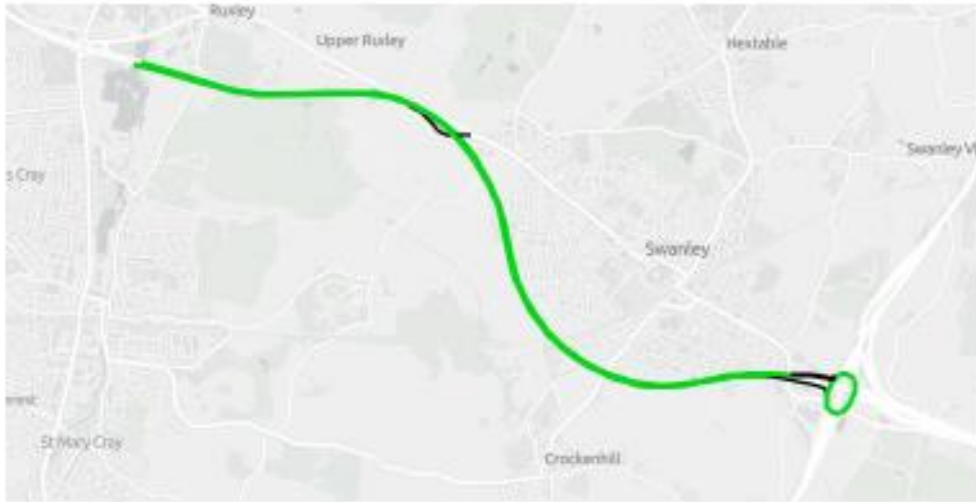




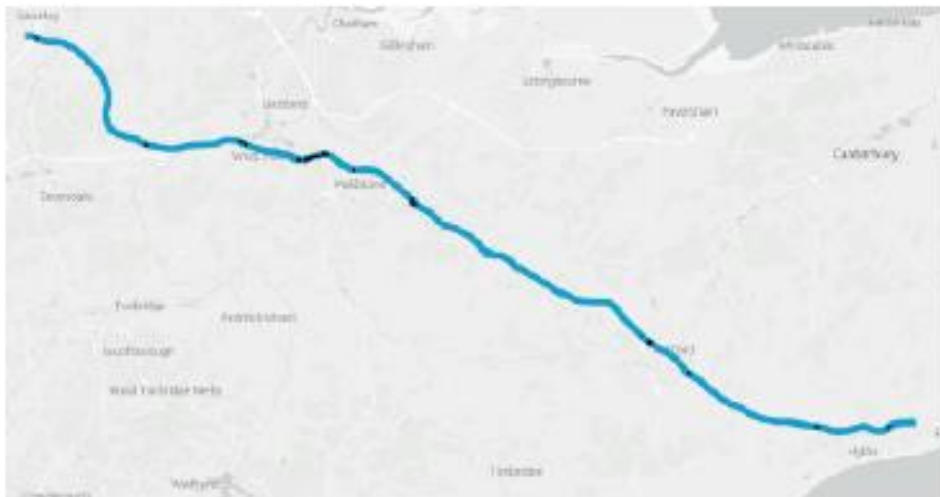


APPENDIX 2

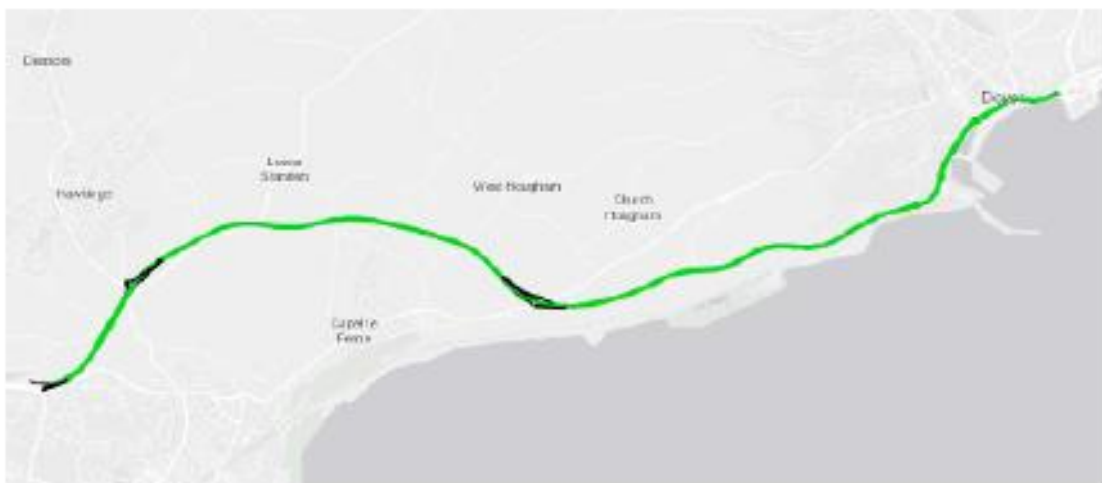
A20 London - M25



M20



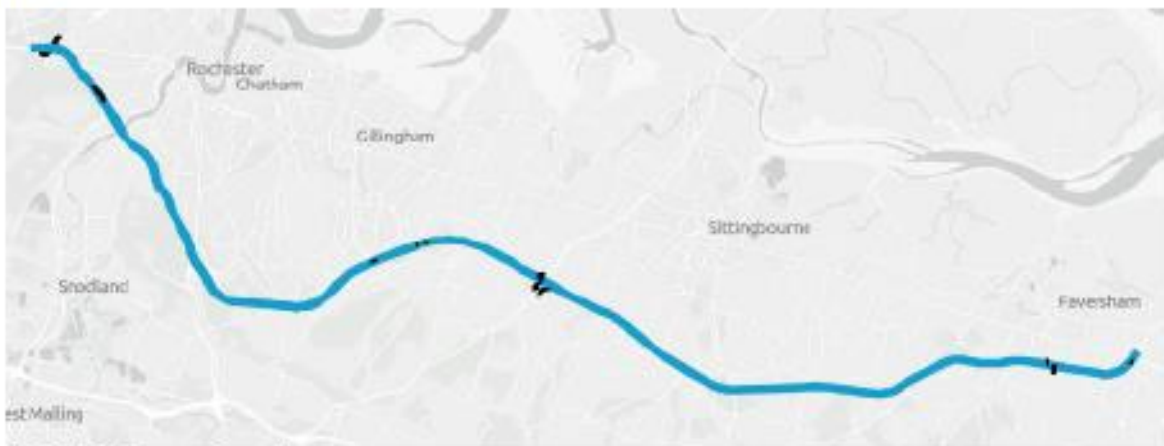
A20 Coast Section



A2 London – M2 Section



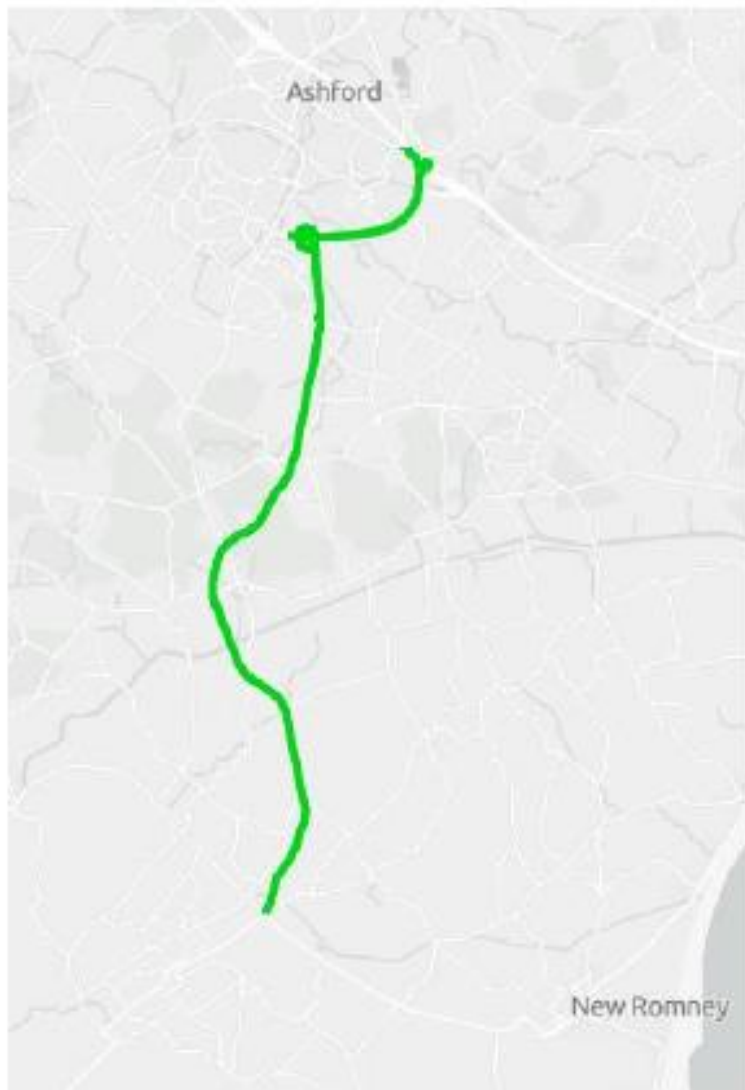
M2



A2 M2 - Dover Section



A2070

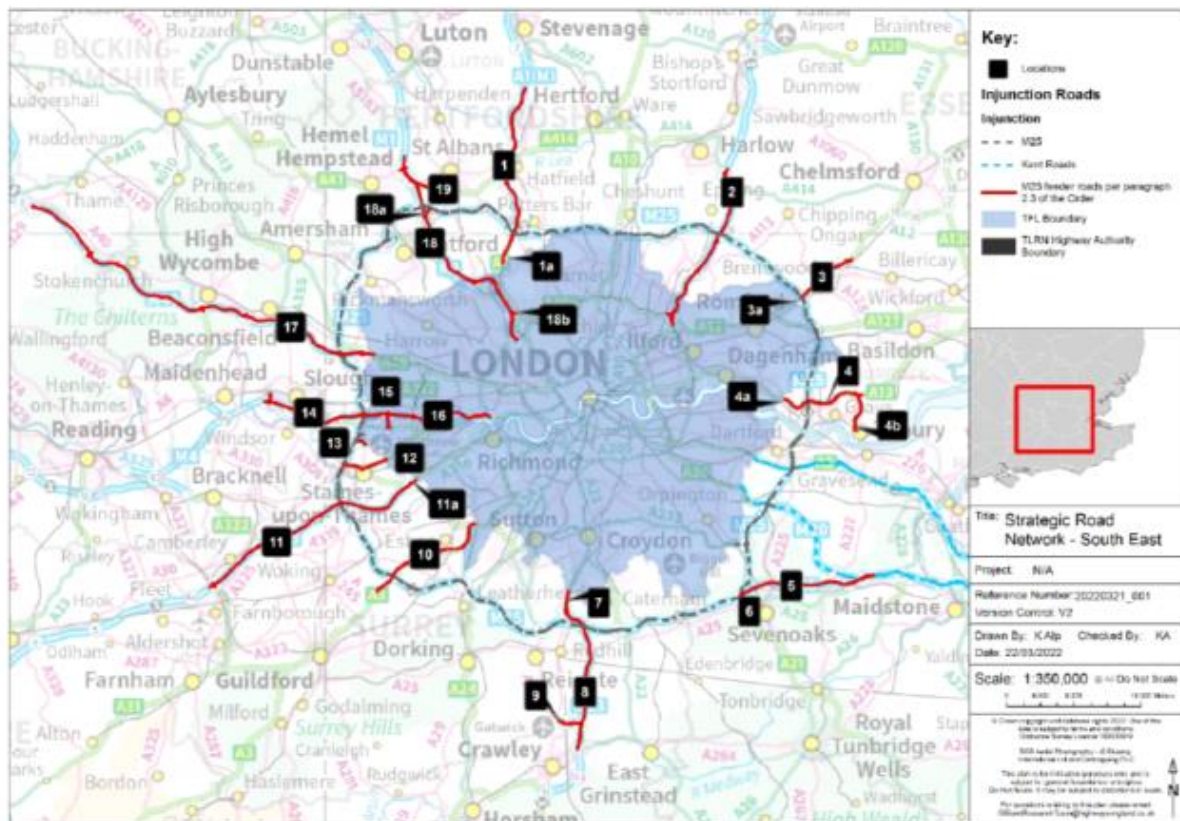


Kent & Surrounding areas SRN



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 Court order]

“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 been a defendant in these proceedings, or who has given undertakings to the Claimant, may nevertheless become Defendant 1 as a person unknown if they commit any of the prohibited acts.

	Name	Address
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.	Alexander RODGER	
3.	Alyson LEE	
4.	Amy PRITCHARD	
5.	Ana HEYATAWIN	
6.	Not used.	
7.	Anne TAYLOR	
8.	Anthony WHITEHOUSE	
9.	Not used.	
10.	Ben TAYLOR	
11.	Benjamin BUSE	
12.	Not used.	
13.	Cameron FORD	
14.	Catherine RENNIE-NASH	

15.	Catherine EASTBURN	
16.	Christian MURRAY-LESLIE	
17.	Christian ROWE	
18.	Cordelia ROWLATT	
19.	Daniel Lee Charles SARGISON	
20.	Daniel SHAW	
21.	David CRAWFORD	
22.	David JONES	
23.	David NIXON	
24.	David SQUIRE	
25.	Diana Elizabeth BLIGH	
26.	Diana HEKT	
27.	Diana Lewen WARNER	
28.	Donald BELL	
29.	Not used.	
30.	Elizabeth ROSSER	
31.	Emma Joanne SMART	
32.	Gabriella DITTON	

33.	Gregory FREY	
34.	Gwen HARRISON	
35.	Harry BARLOW	
36.	Ian BATES	
37.	Ian Duncan WEBB	
38.	James BRADBURY	
39.	James Malcolm Scott SARGISON	
40.	James THOMAS	
41.	Janet BROWN	
42.	Janine EAGLING	
43.	Jerrard Mark LATIMER	
44.	Jessica CAUSBY	
45.	Jonathan Mark COLEMAN	
46.	Joseph SHEPHERD	
47.	Joshua SMITH	
48.	Judith BRUCE	
49.	Julia MERCER	
50.	Julia SCHOFIELD	

51.	Karen MATTHEWS	
52.	Karen WILDIN	
53.	Liam NORTON	
54.	Louis MCKECHNIE	
55.	Louise Charlotte LANCASTER	
56.	Lucy CRAWFORD	
57.	Mair BAIN	
58.	Margaret MALOWSKA	
59.	Marguerite DOUBLEDAY	
60.	Maria LEE	
61.	Martin John NEWELL	
62.	Mary ADAMS	
63.	Not used.	
64.	Not used.	
65.	Meredith WILLIAMS	
66.	Michael BROWN	
67.	Michael Anthony WILEY	
68.	Michelle CHARLSWORTH	

69.	Not used.	
70.	Nathaniel SQUIRE	
71.	Nicholas COOPER	
72.	Nicholas ONLEY	
73.	Nicholas TILL	
74.	Oliver ROCK	
75.	Paul COOPER	
76.	Paul SHEEKY	
77.	Peter BLENCOWE	
78.	Peter MORGAN	
79.	Philippa CLARKE	
80.	Priyadaka CONWAY	
81.	Richard RAMSDEN	
82.	Rob STUART	
83.	Robin Andrew COLLETT	
84.	Roman Andrzej PALUCH-MACHNIK	
85.	Rosemary WEBSTER	
86.	Rowan TILLY	

87.	Ruth Ann COOK	
88.	Ruth JARMAN	
89.	Sarah HIRONS	
90.	Simon REDING	
91.	Stefania MOROSI	
92.	Stephanie AYLETT	
93.	Stephen Charles GOWER	
94.	Stephen PRITCHARD	
95.	Susan CHAMBERS	
96.	Sue PARFITT	
97.	Sue SPENCER- LONGHURST	
98.	Susan HAGLEY	
99.	Suzie WEBB	
100.	Tessa-Marie BURNS	
101.	Theresa NORTON	
102.	Tim SPEERS	
103.	Tim William HEWES	
104.	Tracey MALLAGHAN	

105.	Not used.	
106.	Venitia CARTER	
107.	Victoria Anne LINDSELL	
108.	Not used.	
109.	Bethany MOGIE	
110.	Indigo RUMBELOW	
111.	Not used.	
112.	Ben NEWMAN	
113.	Christopher PARISH	
114.	Elizabeth SMAIL	
115.	Not used.	
116.	Rebecca LOCKYER	
117.	Simon MILNER- EDWARDS	
118.	Stephen BRETT	
119.	Virginia MORRIS	
120.	Andria EFTHIMIOUS- MORDAUNT	
121.	Christopher FORD	
122.	Darcy MITCHELL	

123.	David MANN	
124.	Ellie LITTEN	
125.	Julie MECOLI	
126.	Kai BARTLETT	
127.	Sophie FRANKLIN	
128.	Not used.	
129.	Nicholas BENTLEY	
130.	Nicola STICKELLS	
131.	Mary LIGHT	
132.	David McKENNY	
133.	Giovanna LEWIS	
134.	Margaret REID	
135.	Marcus DECKER	
136.	Morgan TROWLAND	
137.	Abigail PERCY- RADCLIFF	
138.	Alexander WILCOX	
139.	Cressida GETHIAN	
140.	Emma MANI	

SCHEDULE 2

CHIEF CONSTABLES OF THE FORCES OF:

City of London Police

Metropolitan Police Service

Avon and Somerset Constabulary

Bedfordshire Police

Cambridgeshire Constabulary

Cheshire Constabulary

Cleveland Police

Cumbria Constabulary

Derbyshire Constabulary

Devon & Cornwall Police

Dorset Police

Durham Constabulary

Essex Police

Gloucestershire Constabulary

Greater Manchester Police

Hampshire Constabulary

Hertfordshire Constabulary

Humberside Police

Kent Police

Lancashire Constabulary

Leicestershire Police

Lincolnshire Police

Merseyside Police

Norfolk Constabulary

North Yorkshire Police

Northamptonshire Police

Northumbria Police

Nottinghamshire Police

South Yorkshire Police

Staffordshire Police

Suffolk Constabulary

Surrey Police

Sussex Police

Thames Valley Police

Warwickshire Police

West Mercia Police

West Midlands Police

West Yorkshire Police

Wiltshire Police

SCHEDULE 3; FORM OF UNDERTAKING

“I promise to the Court that for a period of two years (up to 10th May 2025) I will not engage in the following conduct

- (a) Blocking or endangering, or preventing the free flow of traffic on the roads (as specified and defined at paragraph 4 of the order of Mr Justice Bennathan made on 12th May 2022) 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, damaged by fire, or affixing any structures thereto
- (c) Entering on foot those parts of the roads which are not authorised for access on foot other than in cases of emergency.

I understand what is covered by that the promises which I have given and also that that if I break any of my promises to the court I may be fined, my assets may be seized or I may be sent to prison for contempt of court.”

Signed

Date

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
AMENDED UNDER THE SLIP RULE**

QB-2021-003576, 003626 and 003737

**Before: Mr Justice Cotter
On: 24th July 2023**

BETWEEN:



NATIONAL HIGHWAYS LIMITED

QB-2021-003576

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) MR ALEXANDER RODGER AND 139 OTHERS

Defendants

ORDER

PENAL NOTICE

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

IMPORTANT NOTICE TO THE DEFENDANTS

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

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

FURTHER TO the order of Mr Justice Cotter on 5th May 2023 (“the order”)

AND UPON the Court considering undertakings given by Defendants pursuant to paragraph 18 of the order

AND FURTHER UPON the Court considering the written submissions on behalf of the Claimant dated 5th June 2023

AND UPON the Court acting of its own motion

IT IS ORDERED THAT:

1. The order shall remain in force subject only to the amendments set out in this order.

Amendments to the Claim

2. Paragraph 2(a) of the order is amended to add Defendant No 28; Donald Bell.
3. The orders of 9th May 2022 and 14th March 2023 are discharged against Rebecca Lockyer (Defendant 116 and incorrectly named as Rebecca Locker at paragraph 17 of the order) and Giovanna Lewis (Defendant 133)
4. Time for compliance with paragraph 18 of the order is extended as follows;
 - (a) In respect of Defendant 36, Ian Bates, Defendant 137, Abigail Percy-Radcliff and Defendant 74, Oliver Rock to 12.00 on 23rd May 2023.
 - (b) In respect of Defendant 90, Simon Redding to 12.00 on 25th May 2023.
 - (c) In respect of Defendant 110, Indigo Rumbelow to 12.00 on 28th June 2023.
5. Following the receipt of undertakings the following Defendants 2,3,4,5,7,8,10,11, 13,15, 16, 17, 18, 19,20,21,22,23,24,25,26,27,30,31,32,33,34,35,36, 37,38,39,40,41,42,43,44,45,46,47,48,49, 51, 55, 56,57, 58,59, 60, 61, 62, 65, 66, 67, 68, 70,71, 73,74, 75, 77, 78,79,80,81,82,83,84,85,86,87,88,89,90,91,92, 94, 95, 96, 97, 98, 99, 102, 103, 106, 107, 109,110, 112, 113, 114, 117, 118, 120, 121, 122, 123, 124, 125, 126, 127, 129, 130, 131, 132, 134, 135, 137, 138 and 139 are removed as named Defendants to this action.
6. For the avoidance of any doubt the action continues against Defendants 14, 50, 52, 53, 54,72,76,93, 100, 101,104, 136 and 140 as named Defendants

Third Party Disclosure

7. Paragraph 11 of the order is varied in that the Chief Constables listed in schedule 2 to the order shall procure that the officers within their forces give the relevant person whose details are to be provided to the Claimant not less than 48 hours' notice that disclosure will be given under the order and supply a copy of the same or refer to an e-mail address/website or phone number provided by the Claimant to enable the order to be provided/available for consideration.
8. The Claimant shall serve a copy of this order upon the Chief Constables of the forces listed in Schedule 2 to this Order and also upon the Police Representative Assistant Chief Constable Owen Weatherill (owen.weatherill@npocc.police.uk), by email only.

Brief reasons

I retain a concern that the Claimant's submissions as to the how the requirements of CPR 31.17 (3) are satisfied assumes what needs to be proved in that there is a case against the relevant individual to be supported. I appreciate that the test is of likelihood of support ("may well" support), but there has been at least one example to date where the disclosure provided under the order has not provided such support and an objection could have been immediately raised. The submissions made in relation to conduct of individuals not caught by the terms of the order being not "unrelated" to the prohibitions under its terms and the "efficiency" of the police only elevate my concerns.

The Court has a clear obligation to ensure, if necessary of its own motion, that this intrusive jurisdiction is not used inappropriately, a fortiori where it concerns the data of individuals who will have had no opportunity to object to its disclosure to the Claimant. In my judgment Article 8 may be engaged and the court must be wary of broad brush assessment of justification before the facts in relation to any particular incident/individual are known

Ordering disclosure against non-parties is an exception and not the normal rule and the power is to be exercised with caution. There is a wide discretion in respect of the making of an order under CPR 31.17.

The order in force on an interim basis (and currently); goes beyond the provision of names and addresses to cover a range of documents. As Freedman J stated in **Transport for London-v-Lee**

"such disclosure may engage the Article 8 rights of individuals. However any interference with that right can be justified for the protection of rights and freedoms of others. Although there are occasions where the Court should consider inviting submissions on behalf of interested parties, this is much more likely where an order is being sought for the provision of detailed documents or records, as opposed to, for instance, simply asking for disclosure of a name and address"

I do not have the relevant orders made in the "numerous cases" in which it is said within the submission that "similar orders" have been made and I am concerned that there may have been a degree of incremental expansion in width. I will deal with the matter on the merits of this case and the submissions before me.

Having carefully considered the Claimant's submission I am prepared to continue the current order subject to a requirement that the Police give the relevant person not less than 48 hours' notice that disclosure will be given under the order and supply a copy of the same or refer to an e-mail address/website or phone number provided by the Claimant to enable the order to be provided.

Service of this order

9. 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/media/rxvlibud/25-july-2023-sealed-order-national-highways-v-persons-unknown.pdf>

- ii. 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.
- iii. Emailing a copy of this Order to:
 1. juststopoil@protonmail.com
 2. juststopoilpress@protonmail.com
 3. insulatebritainlegal@protonmail.com

10. 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 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.

11. 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.
12. Service in accordance with the provisions of paragraphs 9 and 10 above shall be good and sufficient service of this Order on the Defendants and each of them and the requirement for personal service is dispensed with accordingly.

Liberty to apply

13. 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 23 below 48 hours before making such application of the nature of such application and the basis for it.
14. 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.
15. The Claimant has liberty to apply to extend, vary or discharge this Order, or for further directions.

Communications with the Claimant

26. 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 T: 0207 796 6047 /
0114 283 3312

BY THE COURT

MADE ON 24th July 2023

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

QB-2021-003576, 003626 and 003737

**Before: Mr Justice Cotter
On: 3rd October 2023**

BETWEEN:

NATIONAL HIGHWAYS LIMITED

- 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) MR ALEXANDER RODGER AND 139 OTHERS

Defendants

ORDER

PENAL NOTICE

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

IMPORTANT NOTICE TO THE DEFENDANTS

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

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

FURTHER TO the orders of Mr Justice Cotter on 5th May 2023 and 24th July 2023

AND UPON the Court considering undertakings given by Ms Emma Mani ("Defendant 140 ") dated 9th August 2023 and Mr Nicholas Onley ("Defendant 72 ") dated 9th August 2023 and the Claimant's solicitor's e-mail of 9th August 2023

AND UPON the Court acting of its own motion

IT IS ORDERED THAT:

1. The Defendants 72 and 140 are added to paragraph 5 of the order of 24th July 2023
 2. As regards service upon the Defendants to the action ;
 - (a) Service by the Court by e-mail on Defendants 140 and 72 ; and
 - (b) Service by the Claimant via email to
 - (i) juststopoil@protonmail.com
 - (ii) juststopoilpress@protonmail.com
 - (iii) insulatebritainlegal@protonmail.com
- and ;
- (c) The placing by the Claimant of this order on the injunction website

shall together be good and sufficient service of this Order on the Defendants and each of them and the requirement for

personal service is dispensed with accordingly.

3. The Claimant or any Defendant has liberty to apply to vary or discharge this Order

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

Claim No: QB-2021-003576

B E T W E E N:

NATIONAL HIGHWAYS LIMITED

Claimant

-and-

**(1) PERSONS UNKNOWN CAUSING THE BLOCKING,
ENDANGERING, SLOWING DOWN, OBSTRUCTING OR
OTHERWISE PREVENTING THE FREE FLOW OF TRAFFIC
ONTO OR ALONG THE M25 MOTORWAY FOR THE PURPOSE
OF PROTESTING**

(2) MR ALEXANDER RODGER AND 123 OTHERS

Defendants

Claim No: QB-2021-003626

AND B E T W E E N:

NATIONAL HIGHWAYS LIMITED

Claimant

-and-

**(1) PERSONS UNKNOWN CAUSING THE BLOCKING, SLOWING
DOWN, OBSTRUCTING OR OTHERWISE INTERFERING WITH
THE FLOW OF TRAFFIC ONTO OR OFF OR ALONG THE A2,
A20 AND 2070 TRUNK ROADS AND M2 AND M20 MOTORWAY
FOR THE PURPOSE OF PROTESTING**

(2) MR ALEXANDER RODGER AND 123 OTHERS

Defendants

Claim No: QB-2021-003737

AND B E T W E E N:

NATIONAL HIGHWAYS LIMITED

Claimant

-and-

**(1) PERSONS UNKNOWN CAUSING THE BLOCKING, SLOWING
DOWN, OBSTRUCTING OR OTHERWISE INTERFERING WITH
THE FLOW OF TRAFFIC ONTO OR OFF OR ALONG THE
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) MR ALEXANDER RODGER AND 123 OTHERS

Defendants

CONSOLIDATED PARTICULARS OF CLAIM

1. The Claimant (formerly Highways England Company Limited):
 - (1) is a strategic highways company incorporated pursuant to ss. 1 and 15 of Infrastructure Act 2015;
 - (2) became the licence holder, highways authority and owner of the land for the Strategic Road Network (“**the SRN**”) under the Appointment of a Strategic Highways Company Order 2015, SI 2015 No. 376;
 - (3) is consequently the highway authority for the SRN pursuant to s.1A of the Highways Act 1980 (as amended);
 - (4) as highways authority in any event has the physical extent of the highway vested in it pursuant to s. 263 of the Highways Act 1980.
2. The Claimant is entitled as highways authority, alternatively as owner of the SRN, to take steps to prevent trespass and nuisance (both public and private) to the use of, and access to, the highways comprising the SRN.
3. Those Defendants who have been identified and joined individually as Defendants to these proceedings are set out in Annex 1 to these Particulars. Where necessary the Defendants whose names appear in Annex 1 are referred to as “the Named Defendants”, whilst reference to “the Defendants” includes both the Named Defendants and those persons unknown who have not yet been individually identified.
4. The Defendants have taken part in a series of protests since 13 September 2021 on the SRN in London and across the south east of England under the banner of “Insulate Britain” (“**IB**”). The protest action to date has involved the obstruction of highways, and access to the highways, comprising parts of the SRN in and around London (including the M25) and in Kent and also has interfered with the free flow of traffic and the use of the SRN by members of the public.
5. The roads to which these Particulars relate and to which the Orders referred to below apply, are set out in Annex 2 to these particulars (“**the Roads**”).
6. The Claimant has obtained three interim injunctions preventing the unlawful use of the SRN by the Defendants in claims QB-2021-003576, 003626 and 003737. These are the Claimant’s Consolidated Particulars of Claim in relation to the

three claims.

The IB Protests

7. The IB Protests involve protestors obstructing the Roads comprising part of the SRN with their physical presence, normally either by sitting down on or gluing themselves to the road surface and similar activities. They also involve the interference with access to those highways.
8. The IB Protests have been ongoing across the south east of England since 13 September 2021:
 - (1) On 13 September 2021, protestors blocked slip roads and the carriageway around five junctions on the M25.
 - (2) On 15 and 17 September 2021 further protests took place.
 - (3) On 21 September 2021, protests on the M25 intensified, including the blocking of the main carriageway of the M25 in both directions.
 - (4) On 21 September 2021 Lavender J granted, an interim injunction in respect of persons unknown “*causing the blocking, endangering, slowing down, obstructing or otherwise preventing the free flow of traffic onto or along the M25 motorway for the purposes of protesting*” (QB-2021-003576) (“**the M25 Order**”).
 - (5) Subsequently, the protests moved south east along the strategic highway network, and on 24 September 2021 blocked the A20 in Kent and subsequently the port of Dover.
 - (6) On 24 September 2021, Cavanagh J granted an interim injunction in similar terms to the M25 Order in respect of the IB Protests on or around the A2, A20, A2070, M2 and M20 (QB-2021-003626) (“the Kent Order”).
 - (7) On 29 September 2021, protestors blocked, for the second time, junction 3 of the M25.
 - (8) On 30 September 2021, protestors glued their hands to the ground at Junction 30 of the M25.
 - (9) On 1 October 2021, protestors from IB blocked junction 3 of the M4 and junction 1 of the M1.

- (10) May J on 1 October 2021 made two orders joining the Named Defendants to these proceedings, ordering disclosure from the police and permitting alternative service of the M25 and Kent Orders.
- (11) On 2 October 2021, Holgate J granted a third interim injunction covering the SRN providing access to London both inside and outside the M25 (QB-2021-003737 (“the London Order”), the M25 “feeder roads”, on similar terms to the previous injunctions, joining the same named Defendants and replicating May J’s orders for alternative service.
- (12) On 8 October 2021, protestors from IB blocked the M25 at Junction 25. Other protests, outside the SRN and these proceedings have been carried out causing obstruction to roads within London which are part of the GLA strategic road network.
9. The M25, Kent and London Orders are collectively referred to as “**the Orders**”. A plan and details attached to these Particulars as Annex 3 identifies the areas and the Roads included in the prohibitions imposed by the Orders.
10. Throughout the period referred to above, IB has issued press releases admitting the obstruction caused by the protests by its supporters to the Roads and stating an intention to continue the protest campaign, which intention it has given effect to by continued disruption to the SRN and other road networks.
11. The Defendants have all participated in the protest action described in these Particulars, or at least in some of it, and threaten to continue to participate in similar unlawful protest action to the SRN and not necessarily confined to the Roads.

The Defendants

12. To the extent that it has been possible to identify named defendants participating in the IB protests on the Roads, the names of those Defendants have been added to these proceedings.
13. The Claimant also claims against persons unknown by reference to conduct that is unlawful. That conduct has been defined using non-technical language and is clear in its scope and application. In respect of those Defendants who have not yet been identified, the Claimant will continue during these proceedings to identify and name them as soon as reasonably practicable and to continue to seek relief against that category.

Trespass and nuisance

14. As stated in paragraph 1, the Claimant is the freehold owner and highways authority for the SRN, including the Roads, in which the highway is vested pursuant s. 263 of the 1980 Act.
15. The IB Protests involve trespass to the Roads through the obstruction of the free flow of traffic onto and along those parts of the SRN and through extensive disruption of the use of the Roads to other road users on the following occasions:
 - (1) the M25 on 13, 15, 17, 21, 29 and 30 September 2021 and 8 October 2021;
 - (2) the A20 access to the Port of Dover on 24 September 2021;
 - (3) junction 3 of the M4 on 1 October 2021; and
 - (4) junction 1 of the M1 on 1 October 2021.
16. In particular:
 - (1) The Defendants' actions create an immediate threat to life, putting at risk the lives of those protesting and normal motorway users, as well as those reliant on the movement of emergency services vehicles.
 - (2) The protests have caused widespread and serious disruption to other users of the SRN who are unable to exercise their ordinary rights to use the highway. They have caused considerable public expense and economic damage as well as anxiety, inconvenience and distress to other road users.
 - (3) The obstruction and nuisance caused to road users by the IB protests are, as well as being disruptive and costly, intentional. The IB Protests form part of a co-ordinated campaign directed at intentionally creating disruption throughout the road network, including but not limited to the Roads, for the purposes of effecting a specific political outcome.
17. Further, the Defendants' conduct:
 - (1) has exceeded the rights of the public to use the public highway and by causing obstruction and disruption to the highway are trespassing on the SRN;
 - (2) has endangered the life, health, property or comfort of the public and/or

obstructs the public in the exercise of rights common to all Her Majesty's subjects such that a public nuisance has been created, and the Claimant has suffered particular damage over and above the general inconvenience and injury suffered by the public in expending (i) costs incurred in additional internal managerial and staffing time in order to deal with the protest action and (ii) other costs incurred in remedying the wrong;

- (3) threatens, unless restrained, to continue the actions under (1) and (2) and to cause an interference with the reasonable use of the SRN amounting to a private nuisance by obstructing the access to and use of the SRN.
18. By reason of the matters set out herein, there is a real and imminent risk of trespass and nuisance continuing to be committed across the SRN including to the Roads.
19. The Defendants have openly stated an intention to continue to cause obstruction to the SRN, and various parts of it including the Roads, through further protest action similar to that described herein unless restrained by this Honourable Court.
20. Further, by reason of the unlawful behaviour set out herein, the Claimant has suffered loss and damage.

AND THE CLAIMANT CLAIMS:

- (1) An Order that the Defendants, and each of them, are forbidden from:
 - (a) Blocking, slowing down, obstructing or otherwise interfering with the flow of traffic onto or along or off the Roads for the purpose of protesting.
 - (b) Blocking, slowing down, obstructing or otherwise interfering with access to or from the Roads, and on any adjacent roads, slip roads or roundabouts which are not vested in the Claimant, for the purpose of protesting.
 - (c) Causing damage to the surface of or to any apparatus on or around the Roads including but not limited to painting, damaging by fire, or affixing any item or structure thereto.
 - (d) Affixing themselves ("locking on") to any other person or object on the Roads.

- (e) Erecting any structure on the Roads.
 - (f) Tunnelling in the vicinity of the Roads.
 - (g) Entering onto the Roads unless in a motor vehicle.
 - (h) Abandoning any vehicle or item on the Roads with the intention of causing an obstruction.
 - (i) Refusing to leave the area within 50m of the centre of the Roads when asked to do so by a police constable, National Highways Traffic Officer or High Court Enforcement Officer.
 - (j) Causing, assisting or encouraging any other person to do any act prohibited by paragraphs (l)(a) to (i) above.
 - (k) Continuing any act prohibited by paragraphs (l)(a) to (j) above.
- (2) Declaratory relief that the use of the SRN by the Defendants for the purposes of protest which causes an obstruction of the public highway is unlawful and a trespass in that it exceeds the lawful right of the public to use the highway and interferes unreasonably with the use of the highway by other members of the public entitled to use it.
- (3) Damages.
- (4) Costs
- (5) Further **or other relief**

DAVID ELVIN QC

MICHAEL FRY

ADMAS HABTESLASIE

HORATIO WALLER

JOEL SEMAKULA

JONATHAN WELCH

Dated, 22 October 2021

The Claimant believes that the facts stated in these Particulars of Claim are true. The Claimant understands that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

I am duly authorised by the Claimant to sign this statement.

Signed....  ...

Position or office held : Solicitor

Full name : Petra Billing

For the Claimant

DLA Piper UK LLP
1 St Paul's Place
Sheffield
S1 2JX

petra.billing@dlapiper.com

Ref: PXB: 355530/107

Date : 22 October 2021

ANNEX I – the Named Defendants

SCHEDULE 1 – NAMED DEFENDANTS

	Name
1	Alexander RODGER
2	Alyson LEE
3	Amy PRITCHARD
4	Ana HEYATAWIN
5	Andrew WORSLEY
6	Anne TAYLOR
7	Anthony WHITEHOUSE
8	Arne SPRINGORUM
9	Barry MITCHELL
10	Barry MITCHELL
11	Ben TAYLOR
12	Benjamin BUSE
13	Biff William Courtenay WHIPSTER
14	Cameron FORD
15	Catherine RENNIE-NASH
16	Catherine EASTBURN
17	Christian MURRAY-LESLIE

18	Christian ROWE
19	Cordelia ROWLATT
20	Daniel SARGISON
21	Daniel SHAW
22	David CRAWFORD
23	David JONES
24	David NIXON
25	David SQUIRE
26	Diana BLIGH
27	Diana HEKT
28	Diana Lewen WARNER
29	Donald BELL
30	Edward HERBERT
31	Elizabeth ROSSER
32	Emily BROCKLEBANK
33	Emma Joanne SMART
34	Gabriella DITTON
35	Gregory FREY
36	Gwen HARRISON
37	Harry BARLOW

38	Ian BATES
39	Ian Duncan WEBB
40	James BRADBURY
41	James SARGISON
42	James THOMAS
43	Janet BROWN
44	Janine EAGLING
45	Jerrard Mark LATIMER
46	Jessica CAUSBY
47	Jonathan COLEMAN
48	Joseph SHEPHERD
49	Joshua SMITH
50	Judith BRUCE
51	Julia MERCER
52	Julia SCHOFIELD
53	Karen MATTHEWS
54	Karen WILDIN
55	Liam NORTON
56	Louis MCKECHNIE

57	Louise Charlotte LANCASTER
58	Lucy CRAWFORD
59	Mair BAIN
60	Margaret MALOWSKA
61	Marguerite DOWBLEDAY
62	Maria LEE
63	Martin NEWELL
64	Mary ADAMS
65	Matthew LUNNON
66	Matthew TULLEY
67	Meredith WILLIAMS
68	Michael BROWN
69	Michael WILEY
70	Michelle CHARLSWORTH
71	Natalie MORLEY
72	Nathaniel SQUIRE
73	Nicholas COOPER
74	Nicholas ONLEY
75	Nicholas TILL
76	Oliver ROCK

77	Paul COOPER
78	Paul SHEEKY
79	Peter BLENCOWE
80	Peter MORGAN
81	Phillipa CLARKE
82	Priyadaka CONWAY
83	Richard RAMSDEN
84	Rob STUART
85	Robin COLLETT
86	Roman Andrzej PALUCH-MACHNIK
87	Rosemary WEBSTER
88	Rowan TILLY
89	Ruth Ann COOK
90	Ruth JARMAN
91	Sarah HIRONS
92	Serena SCHELLENBERG
93	Simon REDING
94	Stefania MOROSI

95	Stephanie AYLETT
96	Stephen GOWER
97	Stephen PRITCHARD
98	Sue CHAMBERS
99	Sue PARFITT
100	Sue SPENCER-LONGHURST
101	Susan HAGLEY
102	Suzie WEBB
103	Tam MILLAR
104	Tessa-Marie BURNS
105	Theresa NORTON
106	Tim SPEERS
107	Tim William HEWES
108	Tracey MALLAGHAN
109	Tyrone HODGE
110	Valerie SAUNDERS
111	Venitia CARTER
112	Victoria Anne LINDSELL
113	Xavier GONZALEZ TRIMMER

114	Bethany MOGIE
115	Indigo RUMBELOW
116	Adrian TEMPLE-BROWN
117	Ben NEWMAN
118	Christopher PARISH
119	Elizabeth SMAIL
120	Julian MAYNARD SMITH
121	Rebecca LOCKYER
122	Simon MILNER-EDWARDS
123	Stephen BRETT
124	Virginia MORRIS

ANNEX 2 – the Roads

I. For the purposes of these proceedings, the “Roads” comprises:

(1) In the case of the **M25 Order** -

The London Orbital Motorway including but not limited to the verges, central reservation, on- and off-slip roads, overbridges and underbridges including the Dartford Crossing and Queen Elizabeth II Bridge, and any apparatus related to that motorway.

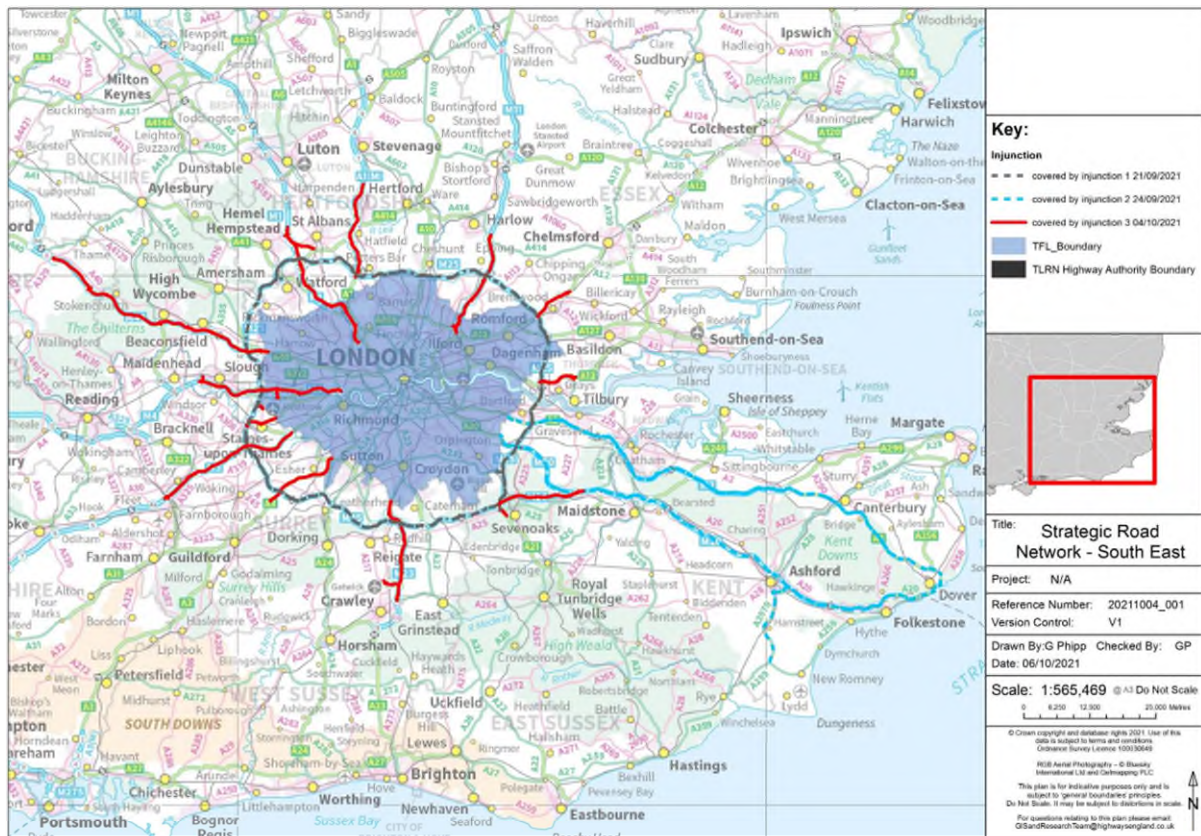
(2) In the case of the **Kent Order** -

The A2, A20, A2070, M2 and M20 including but not limited to the verges, central reservation, on- and off-slip roads, overbridges and underbridges including the Dartford Crossing and Queen Elizabeth II Bridge, and any apparatus related to that motorway.

(3) In the case of the **London Order** -

The A1(M) (Junction 1 to Junction 6), M11 (Junction 4 to Junction 7), A12 (M25 Junction 28 to Junction 12), A13 (M25 Junction 30 to A128 Orsett Junction), M26 (M25 to Junction 3), A21 to B2042, A23 Star Shaw to M25, M23 (Junction 7 to Junction 10 (including M23 Gatwick Spur), A23 (between North and South Terminal Roundabouts), A3 (A240 to M25 Junction 10 to B2039 Ripley Junction), M3 (Junction 1 to Junction 4), A30 (M25 Junction 13 to A3115), A3113 (M25 Junction 14 to A3044), M4 (Junction 4B to Junction 7), M4 Spur (M4 Junction 4 to M4 Junction 4a), M40 (Junction 1A to Junction 4), M4 (M4 Junction 7 to A4), M1 (Junction 1 to Junction 8) and A414 (M1 Junction 8 to A405) (together the “Roads”) means the roads identified in the plans annexed to this Order (Annex 2) including but not limited to the verges, central reservation, on- and off-slip roads, overbridges and underbridges and any apparatus related to that motorway.

ANNEX 3 – Plan



1. A1(M) from junction 1 to Junction 6
2. M11 from Junction 4 to Junction 7
3. A12 from M25 Junction 28 to A12 Junction 12
4. A13 from M25 Junction 30 to junction with A1089
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
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
19. A414 from M1 Junction 8 to A405
20. A2 from TfL boundary to M2
21. M2 (the whole motorway) from Junction 1 to Junction 7

22. A2 from M2 Junction 7 to A20 Eastern Docks Roundabout, Dover
23. A20 from TfL boundary to M25 Junction 3
24. M20 (the whole motorway) from M25 Junction 3 to M20 Junction 13. 25.A20 from M20 Junction 13 up to and including Eastern Docks Roundabout
26. A2070 from A259 to M20 Junction 10 and 10a

Witness statement on behalf of the Claimant

Antony Nwanodi

1st

AN/1 - AN/4

30th September 2021

Claim No. QB-2021-003576

IN THE HIGH COURT OF JUSTICE

QUEEN'S BENCH DIVISION

B E T W E E N

NATIONAL HIGHWAYS LIMITED

Claimant

-and-

**PERSONS UNKNOWN CAUSING THE BLOCKING, ENDANGERING, SLOWING
DOWN, OBSTRUCTING OR OTHERWISE PREVENTING THE FREE FLOW OF
TRAFFIC ONTO OR ALONG THE M25 MOTORWAY FOR THE PURPOSE OF
PROTESTING**

Defendant

**WITNESS STATEMENT OF
ANTONY NWANODI**

I, Antony Nwanodi, of the Government Legal Department, 102 Petty France, Westminster, London SW1H 9GL will say as follows:

1. I am the lawyer with conduct of this matter on behalf of the Claimant. I make this statement in support of the Claimant's applications for orders that:
 - a. A number of Chief Constables disclose the names and addresses of protestors removed from the M25 to the Claimant, and additionally all material relevant to enforcement of the injunction of the Honourable Mr Justice Lavender of 21 September 2021. Since this application is made at the request of the police, it is hoped that it is not opposed by the Chief Constables concerned.
 - b. The requirement for personal service of the injunction be dispensed with, and alternative service be permitted.
 - c. Named defendants be added to the proceedings as set out in the annexe to the draft Order.

2. Identical issues have arisen in this case and the other claim in which the Claimant has obtained an interim injunction in respect of the Kent roads (Order of the Honourable Mr Justice Cavanaugh of 24th September 2021). For that reason, the same application has been issued in each case (supported by a very similar statement). It is respectfully suggested that the two applications should be considered together for convenience and saving of time.

Background

3. Starting on 13th September 2021 the group 'Insulate Britain' began a number of protests. Those protests involved individuals running onto the motorway and remaining there. A number of protestors used glue and other methods to secure themselves to the surface of the highway and serious disruption was caused to the flow of the traffic and to the ability of other road users to pass along the motorway.
4. The Claimant is responsible for the operation, maintenance and improvement of the United Kingdom's motorways and major A roads ('the Strategic Road Network'). It is responsible for the M25 and for other highways which have been the subject of protests by Insulate Britain.
5. The Claimant considers that the protests organised by Insulate Britain are extremely dangerous. When entering the motorway there is a substantial risk to the life of the protestors and lawful road users. The vehicles on these roads usually travel at 70 MPH (or faster) and drivers may not react swiftly enough to an unexpected pedestrian incursion. The Claimant is also aware that the disruption and gridlock caused by the protests has imperilled life in other ways: ambulance and other emergency service vehicles are reported to have struggled to make good time when responding to emergencies. Further, serious disruption is caused to other road users and they are prevented from exercising their ordinary rights to pass and repass along the highway.
6. In the light of the danger and disruption caused by the protests the Claimant initiated these proceedings (and other similar applications) seeking an injunction against the protestors. An interim injunction was granted by the Honourable Mr Justice Lavender in respect of the M25 on 21st September 2021 ("the M25 injunction"). An interim injunction was granted by the Honourable Mr Justice Cavanaugh in respect of the A2, A20, A2070, M2 and M20 on 24th September 2021 ("the Kent injunction"). I produce and exhibit those orders as exhibit AN/1.

7. Each of the injunctions includes a recital recording an undertaking given by the Claimant “to identify and name Defendants and apply to add them as named Defendants to this Order as soon as reasonably practicable”. The injunctions also prohibit protestors from refusing to leave when ordered to by *inter alia* ‘a police constable’.
8. Having obtained injunctions discussions occurred with the police forces whose officers were likely to be deployed to the protests. Much of this discussion occurred under the aegis of the National Police Coordination Centre (‘NPoCC’). Those discussions are continuing.
9. Stephen Bramley CBE is the Director of Legal Services of the Metropolitan Police. In this case he has worked through NPoCC to coordinate the approach being taken to the Court’s interim injunctions by the police. In particular, he has been liaising with the Claimant as to the correct approach to be taken to providing information to the Claimant so as to allowing the Claimant’s representatives to serve the injunctions on protestors, and to evidence breaches of the injunctions.
10. In relation to the first of those issues, the Claimant asked the various police forces involved to share the name and address of protestors arrested on the highways. Until the Claimant is provided with the name and address of all of the protestors it cannot add them as named Defendants to the proceedings. In such circumstances the orders’ impact and enforceability is undermined and the Claimant cannot comply with the undertaking it gave when each injunction was granted. Whilst some of these names have now been provided by some of the forces, Mr Bramley remains concerned as to the scope of information that can be shared with NH and it has not been possible therefore to obtain all of the information as to identities held by the police.
11. By an email sent to me and several others at 16:57 on 23rd September he explained (emphasis in the original):

...lawyers for all forces responsible for policing the M25 (MPS, Essex, Kent, Surrey, Thames valley, Herts) have agreed:

- It is safest for all concerned for officers to continue their task of removing protestors from the motorway and establishing their names and addresses. We know at least 104 have been identified this way so far

- **We don't recommend that high court enforcement officers are involved at this stage in serving them with the unamended injunction**

- Instead we would consent to NH applying to the high court for an order under CPR 31.17/18 requiring disclosure by those forces of identifying information of such protesters. We believe this should be a speedy and straightforward process

- Upon forces furnishing NH with such identifying information, **NH then apply to the court to amend the injunction to:**

(i) Add named defendants

...

- This would enable **enforcement officers to serve the amended injunction personally on named defendants** at their home addresses- safer for all concerned

- The need for a protocol to enable enforcement officers to serve the amended injunction personally in a motorway setting would be secondary, and contingent on the named defendants not being contactable at the address given. Police lawyers can consider further the terms of an amended protocol to provide for this, and also for a further pack of evidence to be gathered by police to enable a committal application to be made in due course

...

12. Following discussions, over the weekend of 25th/26th September, a protocol and memorandum of understanding was put together between NH and Mr Bramley, to allow for some information sharing. Despite this, the Police view was that they required a Court order, to be able to share both the name and address of protestors and evidence of breaches of the injunctions with the Claimant. Whilst there has been some information sharing, and there is a willingness to co-operate at some level at least, the position is far from certain given the earlier statements by the Police and the Claimant does not consider that it is acceptable to

allow the uncertainty to continue given the continuing protests and multiple and deliberate breaches of the Court's orders.

13. For that reason, it is necessary to make this application pursuant to CPR 31.17 to make the position with regard to disclosure clear to the Police and to enable the Court orders to be served and to take steps to enable those orders to be enforced. On the basis of Mr Bramley's email it is expected that the various police forces will not oppose the making of an order that they disclose the name and address of each arrested person to the Claimant, and, for the purposes of the proceedings and in particular to take steps to enforce the Court orders, to the forces sharing evidence of breaches of the injunction, such as body worn video footage showing protestors in the road and other evidential material. However, very recent communications with Mr Bramley suggest that there may be some resistance to an order which, absent a clear and unequivocal commitment to disclose the materials sought (which may only be used in the context of proceeding as provided for in CPR Part 31.22) – which strengthens the need to obtain it since it underlines the uncertainty in the position of the Police with regard to sharing information necessary to the civil proceedings.

The necessity of disclosure

14. The names and addresses, and evidence of breaches of the Court's orders constitute material likely to support the Claimant's case and/or to adversely affect the case of the Defendants. Without the provision of information to the identify and addresses of the Defendants, and demonstrating breaches of order, it will be impossible to proceed with the case and to enforce the orders obtained, and thus to restore the proper use of the motorways and the rights of the public over them.. Moreover, the information would allow the Claimant to comply with the undertaking given to Mr Justice Lavender.
15. Furthermore, the disclosure is necessary because without it the interests of both the Claimant and the Defendants are prejudiced. In respect of the Claimant this is because the injunction proceedings are undermined. In respect of the Defendants prejudice arises because unless the protestors are named in the proceedings their ability to contest the injunction is impaired

although it is clear that their own website has links on it to the Court orders, as does the Claimant's website. I exhibit these as AN/2¹.

Conclusion on disclosure

16. In the circumstances the court is requested to make this order pursuant to CPR 31.17 and that in the circumstances it is appropriate and proportionate to do so.

Service of the proceedings and the Orders

17. The Honourable Mr Justice Lavender ordered personal service of the injunction made on 21 September. The Claimants obtained some definitive information concerning the identities of the Defendants for the first time from the police on Monday 27th September. The Claimant has sought to effect personal service on the individuals identified thus far.
18. In a number of cases, personal service has not been possible. I have spoken to the High Court Enforcement Group (who are seeking to effect service for the Claimant), and have been told that in some cases this was due to the individuals refusing service (presumably being tipped off that it was incoming), and in other cases because the individuals are not at their home address, but residing elsewhere. I was told on a call at 2.30pm on 29 September that to date there had been 76 visits by process servers, 11 successful, 65 unsuccessful visits. There were 29 remaining at that time.
19. I exhibit as AN/3 a report sheet which I received at 16:26 from HCEG on 29 September showing various failed attempts at personal service, in various cases there being no response or the process server being told the individual in question was away.

Alternative service

20. The Court is respectfully requested to allow alternative service of the claim form and injunction pursuant to CPR r.6.15 and r.6.27.

¹ <https://www.insulatebritain.com/injunction-what-injunction;>
[https://highwaysengland.co.uk/media/wcufrac5/national-highways-limited-v-persons-unknown-approved-order-21-09-21.pdf;](https://highwaysengland.co.uk/media/wcufrac5/national-highways-limited-v-persons-unknown-approved-order-21-09-21.pdf) [https://highwaysengland.co.uk/media/s5vocubs/interim-injunction-a20-et-al-sealed-202210924.pdf\]](https://highwaysengland.co.uk/media/s5vocubs/interim-injunction-a20-et-al-sealed-202210924.pdf)

21. Notwithstanding the existence of the injunctions, which have been publicised in the press and on Insulate Britain's own website the "Insulate Britain" protesters have continued to obstruct the enjoined highways, in open defiance of the Court's Orders, and showing clear knowledge of the Court's Orders [see: <https://www.insulatebritain.com/injunction-what-injunction>]: see AN/2. Indeed, the Insulate Britain website provides links (which work, as of 29th September) to copies of the injunctions in force [<https://www.insulatebritain.com/insulate-britain-returns-to-block-m25-junction-for-the-second-time-today>]. The group is clearly aware of the existence of the injunctions. I exhibit these pages as AN/4. I can confirm that the links provided lead to the Court Orders and allow them to be read and downloaded.
22. I should draw to the Court's attention that some of the Police forces involved may be willing to allow service of those arrested after they have completed the charging process at the police station, but this is unlikely to enable service to be effected on all of those whose names and addresses have already been given (though there are persons whose names have appeared on a number of occasions who may be arrested again, but this is not certain).
23. Service, which has to date not been possible despite attempts by process servers, is a prerequisite to enforcing the Order of the Court by bringing committal proceedings. The inability to serve the Defendants' personally means the Claimant is hampered in its ability to enforce the Orders of the Court, and since the protesters are clearly willing to act in open defiance of the Court Orders, it seems that committal proceedings will likely be the only means of enforcing the Orders of the Court and preventing the deleterious effects of the protests on the road network.

Conclusion on service

24. The Court is respectfully requested to grant an order permitting alternative service by one or more of the following means:
- a. Publication of the injunction on the "Insulate Britain" website [<https://www.insulatebritain.com/>] which contains links to the Court Orders
 - b. The Claimant to post the injunction on the "Insulate Britain" Facebook page [<https://www.facebook.com/insulatebritain>].

Witness statement on behalf of the Claimant

Antony Nwanodi

1st

AN/1 - AN/4

30th September 2021

- c. The Claimant to post sealed copies on its own web page [<https://highwaysengland.co.uk/media/wcufrac5/national-highways-limited-v-persons-unknown-approved-order-21-09-21.pdf>].
- d. The Claimant to serve by posting a copy of the order through the letterbox of each Defendant with a notice affixed to the front door if necessary, drawing the recipients attention to the fact the package contains a court order. In the event that the premises do not have a letter box, a package containing the Court orders and the proceedings may be affixed to the front door marked with a notice drawing attention to the fact that the package contains a court order and should be read urgently (see details in draft Order).

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

Name:.....Antony Nwanodi.....

Signature:...



Date:.....30 September 2021.....

Witness statement on behalf of the Claimant
Antony Nwanodi
1st
AN/1 - AN/4
30th September 2021
Claim No. QB-2021-003576

IN THE HIGH COURT OF JUSTICE

QUEEN'S BENCH DIVISION

B E T W E E N

NATIONAL HIGHWAYS LIMITED

Claimant

-and-

**PERSONS UNKNOWN CAUSING THE BLOCKING, ENDANGERING, SLOWING
DOWN, OBSTRUCTING OR OTHERWISE PREVENTING THE FREE FLOW OF
TRAFFIC ONTO OR ALONG THE M25 MOTORWAY FOR THE PURPOSE OF
PROTESTING**

Defendant

EXHIBIT AN/1

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

**Before: Mr Justice Lavender
On: 21 September 2021**

B E T W E E N:

NATIONAL HIGHWAYS LIMITED

Claimant

-and-

**(1) PERSONS UNKNOWN CAUSING THE BLOCKING, ENDANGERING,
SLOWING DOWN, OBSTRUCTING OR OTHERWISE PREVENTING THE FREE
FLOW OF TRAFFIC ONTO OR ALONG THE M25 MOTORWAY FOR THE
PURPOSE OF PROTESTING**

Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

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



UPON the Claimant’s claim in trespass, nuisance and under the Highways Act 1980 by Claim Form dated 21 September 2021 (“the Claim”)

AND UPON READING the Claim Form and the supporting evidence

AND UPON hearing Michael Fry and Jonathan Welch, Counsel for the Claimant

AND UPON the Claimant undertaking to pay the relevant court fees and to provide any witness statement(s) supporting the Claim within 48 hours of the sealing of this Order

AND UPON the Claimant indicating that it will provide to the Defendants copies of further evidence or other documents filed in these proceedings upon request, following the Defendants or their representatives providing contact details to the Claimant’s solicitors

AND UPON the Court accepting the Claimant’s undertaking that the Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss

AND UPON the Claimant undertaking to identify and name Defendants and apply to add them as named Defendants to this Order as soon as reasonably practicable

AND UPON the Claimant confirming that this Order is not intended to prohibit lawful protest which does not endanger, slow, obstruct, or prevent the free flow of traffic onto or along the M25 motorway nor to prevent lawful use of the M25 by any person

IT IS ORDERED THAT:

1. For the purposes of this Order, the “M25” means the London Orbital Motorway including but not limited to the verges, central reservation, on- and off-slip roads, overbridges and underbridges including the Dartford Crossing and Queen Elizabeth II Bridge, and any apparatus related to that motorway.

Injunction in force

2. With immediate effect and until the earlier of (i) Trial; (ii) Further Order; or (iii) 23.59 pm on 21 March 2022, the Defendants and each of them are forbidden from:

- 2.1 Blocking, endangering, slowing down, preventing, or obstructing the free flow of traffic onto or along or off the M25 for the purposes of protesting.
 - 2.2 Causing damage to the surface of or to any apparatus on or around the M25 including but not limited to painting, damaging by fire, or affixing any item or structure thereto.
 - 2.3 Affixing themselves (“locking on”) to any other person or object on the M25.
 - 2.4 Erecting any structure on the M25.
 - 2.5 Tunnelling in the vicinity of the M25.
 - 2.6 Entering onto the M25 unless in a motor vehicle.
 - 2.7 Abandoning any vehicle or item on the M25 with the intention of causing an obstruction.
 - 2.8 Refusing to leave the area of the M25 when asked to do so by a police constable, National Highways Traffic Officer or High Court Enforcement Officer.
 - 2.9 Causing, assisting or encouraging any other person to do any act prohibited by paragraphs 2.1 – 2.8 above.
 - 2.10 Continuing any act prohibited by paragraphs 2.1 – 2.9 above.
3. The Claimant shall:
 - 3.1 Place copies of this Order and the Claim Form on the National Highways and Gov.uk website; and
 - 3.2 Send a copy of this Order and the Claim Form to Insulate Britain’s email address: Insulate Britain ring2021@protonmail.com.
 4. For the avoidance of doubt, compliance with paragraph 3 shall not constitute service.

Further directions

5. 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 immediately (and in any event not less than 48 hours before the hearing of any such application).

6. Any person applying to vary or discharge this order must provide their full name and address, an address for service, and must also apply to be joined as a named defendant to the proceedings at the same time.
7. The Claimant has liberty to apply to extend or vary this Order or for further directions.
8. The return date hearing to be listed for 10.30 am on 5 October 2021 in person.
9. Costs reserved.

Communications with the Claimant

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

FAO Antony Nwanodi
Government Legal Department,
102 Petty France, Westminster,
London SW1H 9GL
E: tony.nwanodi@governmentlegal.gov.uk
T: 020 7210 3424

BY THE COURT

Dated: 21 September 2021

Witness statement on behalf of the Claimant
Antony Nwanodi
1st
AN/1 - AN/4
30th September 2021
Claim No. QB-2021-003576

IN THE HIGH COURT OF JUSTICE

QUEEN'S BENCH DIVISION

B E T W E E N

NATIONAL HIGHWAYS LIMITED

Claimant

-and-

**PERSONS UNKNOWN CAUSING THE BLOCKING, ENDANGERING, SLOWING
DOWN, OBSTRUCTING OR OTHERWISE PREVENTING THE FREE FLOW OF
TRAFFIC ONTO OR ALONG THE M25 MOTORWAY FOR THE PURPOSE OF
PROTESTING**

Defendant

EXHIBIT AN/2



INJUNCTION? WHAT INJUNCTION?

28 September, 2021

A total of 115 people have been involved in Insulate Britain's campaign of disruptive actions over the last two weeks, with most being arrested multiple times. The total arrest tally has now reached 438.

Fifteen Insulate Britain supporters have been arrested as many as six times and twenty-one have been arrested five times for their participation in the campaign, which began on September 13th and has involved blocking roads on and around the M25 network and at the Port of Dover.

The total arrest figure includes five people arrested for conspiracy to cause a public nuisance and subsequently released under investigation.

The police are choosing not to detain people involved in the Insulate Britain campaign, although many have been involved in multiple actions, have broken their bail conditions and have expressed a clear intention to continue with the campaign. Only two people from Insulate Britain have so far been remanded in custody.

Yesterday, 52 people blocked the M25, in breach of the terms of an injunction granted to the Highways Agency on 22nd September. [1]

A second injunction was granted on 24th September covering the A2, A20 and A2070 trunk roads and M2 and M20 motorway, after an Insulate Britain action outside the Port of Dover last Thursday. [2]

Insulate Britain says actions will continue until the government makes a meaningful commitment to insulate all of Britain's 29 million leaky homes by 2030, which are among the oldest and most energy inefficient in Europe. [3]

ENDS

Press contact: 07737 457105

Email: insulatebritainpress@protonmail.com

High quality photos and video footage available here:

<https://drive.google.com/drive/folders/1Kucq-NfhNZLGJWwLx1HX03cWR7M9Y2-m>

Website: <https://www.insulatebritain.com/>

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

Twitter: <https://twitter.com/insulatelove?lang=en>

Youtube: <https://www.youtube.com/channel/UC8N5mAeeCLbD-AFUqtPaF0g>

Notes to Editors

[1] <https://highwaysengland.co.uk/media/wcufrac5/national-highways-limited-v-persons-unknown-approved-order-21-09-21.pdf>

[3] About Insulate Britain

Insulate Britain is a new campaign group that is calling on the UK government to put in place policy and funding for a national home insulation programme starting with all social housing.

We demand the Prime Minister and the government to #getonwiththejob, face up to their responsibility and lead our country through the climate crisis.

We are ordinary British citizens with simple and achievable demands to #INSULATEBRITAIN

The UK government must immediately promise to fully fund and take responsibility for the insulation of all social housing in Britain

We demand a national home insulation strategy that gives British people the justice they deserve: a future for our loved ones, lower energy bills and safer living conditions

We are scared: our livelihoods are at risk and the futures of our children are uncertain

The Climate Crisis is a threat to all: we demand the government to act now

Our Demands

1. That the UK government immediately promises to fully fund and take responsibility for the insulation of all social housing in Britain by 2025;
2. That the UK government immediately promises to produce within four months a legally binding national plan to fully fund and take responsibility for the full low-energy and low-carbon whole-house retrofit , with no externalised costs, of all homes in Britain by 2030 as part of a just transition to full decarbonisation of all parts of society and the economy.

Further information about Insulate Britain and our demands here:

<https://www.insulatebritain.com/>

Technical Report on home energy efficiency here:

<https://drive.google.com/file/d/1HtOQmArzkDxhIYJrv9lBcl9lOUwfKoe7/view>

Witness statement on behalf of the Claimant
Antony Nwanodi
1st
AN/1 - AN/4
30th September 2021
Claim No. QB-2021-003576

IN THE HIGH COURT OF JUSTICE

QUEEN'S BENCH DIVISION

B E T W E E N

NATIONAL HIGHWAYS LIMITED

Claimant

-and-

**PERSONS UNKNOWN CAUSING THE BLOCKING, ENDANGERING, SLOWING
DOWN, OBSTRUCTING OR OTHERWISE PREVENTING THE FREE FLOW OF
TRAFFIC ONTO OR ALONG THE M25 MOTORWAY FOR THE PURPOSE OF
PROTESTING**

Defendant

EXHIBIT AN/3

High Court
Enforcement
Group Ltd

Our Ref	Defendant Name	PostCode	Notes
SWN18373PS	Liam Norton	Flat 4 Esplanade Gardens Scarborough North Yorkshire YO11 2AW	Our Process Server attended Flat 4, Esplanade Gardens, Scarborough, North Yorkshire, YO11 2AW on Wednesday 29 September 2021 at 06:00. The residential flat property is in fair condition. Process Server's comments: Gained access into the communal area and located a letterbox for "Norton". There was no response via the intercom on the first try, on the 2nd a female responded, asking me to identify myself, I did so and she stated I would have to call back later. I asked to speak to Liam Norton, she advised he is "definitely" not here. This may potentially be the mother's address, a Theresa Norton, as we also have documents for this person. At this time I have been unable to serve documents.
SWN18375PS	Christian Leslie Murray	122 Derby Road Melbourne Derby Derbyshire DE73 8FL	Our Process Server attended 122 Derby Road, Melbourne, Derby, Derbyshire, DE73 8FL on Wednesday 29 September 2021 06:17 hours. The residential detached property is in fair condition. Process Server's comments: No contact at the address, there was a large dog behind the front door.
SWN18381PS	Gabriella Ditton	189 Silver Road Norwich NR3 4TL	Our Process Server attended 189 Silver Road, Norwich, NR3 4TL on Wednesday 29 September 2021 at 08:47 hours. The residential terrace property is in fair condition. Process Server's comments: No contact made at the property.
SWN18389PS	Amy Pritchard	9 Gainsford Road London E17 6QB	Our Process Server attended 9 Gainsford Road, London, E17 6QB on Wednesday 29 September 2021 at 08:08 hours. The residential semi detached property is in fair condition. Process Server's comments: I was unable to get a response from the property and able to confirm residency.
SWN18431PS	Anne Taylor	100 Walton Street Oxford Oxfordshire OX2 6EB	Our Process Server attended 100 Walton Street, Oxford, Oxfordshire, OX2 6EB on Wednesday 29 September 2021 at 08:05 hours. The residential terrace property is in fair condition. Process Server's comments: There was no answer from the property. The neighbour at No. 101 stated it is her mother. The female stated that the defendant was currently not at home and does not know when she will return.

SWN18517PS	Ian Bates	52 CLARKE ROAD NORTHAMPTON NORTHAMPTON SHIRE NN1 4PW	Our Process Server attended 52 Clarke Road, Northampton, Northamptonshire, NN1 4PW on Wednesday 29 September 2021 at 09:46 hours. The residential terrace property is in fair condition. Process Server's comments: A male answered the door and stated that he rents the property from the Defendant but that the Defendant does not live there. The male stated that he just pays the Defendant rent, he has no bills or anything. A driving licence was shown as proof of identification but this did have a different address. The male provided me with a contact number for the Defendant. I proceeded to call the mobile number which went to a voicemail message of himself stating that he is away for 3 weeks from the 13th September.
SWN18559PS	Serena Schellenberg	Little Gates Church Road Hellingly East Sussex BN27 4EX	Our Process Server attended Little Gates, Church Road, Hellingly, East Sussex, BN27 4EX on Wednesday 29 September 2021. The residential terrace property is in fair condition. Process Server's comments: Upon attendance, contact was made with an adult male who stated the Defendant is out and he doesn't know what time she will be back. The adult male confirmed it is her property and that he is just a friend visiting.
SWN18573PS	Tracey Mallaghan	4 Brushford Close Furzton Milton Keynes MK4 1EG	Our Process Server attended 4 Brushford Close, Furzton, Milton Keynes, MK4 1EG on Wednesday 29 September 2021. The residential detached property is in fair condition. Process Server's comments: As I drove past the property a vehicle drove onto the driveway. I knocked on the front door, which was answered by an adult female. I asked for Tracey Mallaghan and I was informed that she does reside at the address, however she has not been home for three weeks and has been in London dealing with the M25 staff. The person I spoke with, confirmed she is the Defendant's mother.
SWN18575PS	Tyrone Hodge	1 Peskett Close Barns Green Horsham West Sussex RH13 0PY	Our Process Server attended 1 Peskett Close, Barns Green, Horsham, West Sussex, RH13 0PY on Wednesday 29 September 2021. The residential semi-detached property is in fair condition. Process Server's comments: I attended the address and spoke with builders outside the property. They confirmed they did not know of a Tyrone Hodge at the address and that "Sophie" and "George" live at the address. Upon knocking the front door, I made contact with Sophie. She stated that the Defendant used to reside at the address with his nan, but when she passed away, he vacated. Sophie went on to say that they still receive post for Tyrone, one was a letter from Specsavers regarding some stolen sunglasses and some Court letters.

SWN18549PS	Matthew Lunnon	11 Pantglas Pentrych Cardiff CF15 9TH	<p>Our Process Server attended 11 Pantglas, Pentrych, Cardiff, CF15 9TH on Wednesday 29 September 2021 at 09:01 hours. The residential detached property is in fair condition.</p> <p>Process Server's comments: I met with Mr Lunnon's wife at the address who stated that he was not here this week, he was away. Mrs Lunnon advised that she had an address at which he was staying along with a telephone number, both of which were provided to me. Address: 17 Spring Hill, Stroud, Gloucester, GL5 1TN. Telephone Number: 07837 988103 Mrs Lunnon stated that this is where he is this week.</p>
SWN18361PS	Mary Adams	303 Granite Apartments 30 River Walk Greenwich London SE10 0GA	<p>Our Process Server attended 303 Granite Apartments, 30 River Walk, Greenwich, London, SE10 0GA on Wednesday 29 September 2021 at 13:51 hours. The residential flat property is in fair condition.</p> <p>Process Server's comments: There was no answer at the intercom to the building and I was unable to gain access via any other means.</p>
SWN18352PS	Stephanie Aylett	51 High Oaks St. Albans Hertfordshire AL3 6EL	<p>Our Process Server attended 51 High Oaks, St. Albans, Hertfordshire, AL3 6EL on Wednesday 29 September 2021 at 12:57 hours. The residential detached property is in fair condition.</p> <p>Process Server's comments: I met with a male at the address who confirmed that the Defendant resides there but isn't there at the moment. The male stated that he does not know where she is or have a contact number for her.</p>

Witness statement on behalf of the Claimant
Antony Nwanodi
1st
AN/1 - AN/4
30th September 2021
Claim No. QB-2021-003576

IN THE HIGH COURT OF JUSTICE

QUEEN'S BENCH DIVISION

B E T W E E N

NATIONAL HIGHWAYS LIMITED

Claimant

-and-

**PERSONS UNKNOWN CAUSING THE BLOCKING, ENDANGERING, SLOWING
DOWN, OBSTRUCTING OR OTHERWISE PREVENTING THE FREE FLOW OF
TRAFFIC ONTO OR ALONG THE M25 MOTORWAY FOR THE PURPOSE OF
PROTESTING**

Defendant

EXHIBIT AN/4



INSULATE BRITAIN RETURNS TO BLOCK M25 JUNCTION FOR

THE SECOND TIME TODAY

29 September, 2021

Insulate Britain has returned for the second time today to block the M25 at Swanley (Junction 3).

This follows an earlier action at the same junction which took place at 7.30am, where Insulate Britain supporters sat down on the carriageway, gluing their hands to each other and the road, while others poured oil onto the carriageway.

Revd Sue Parfitt from Bristol, who was involved in the first of today's actions said earlier:

“Many people will ask why a 79 year old Anglican Priest is sitting in the road, causing disruption and how can I justify participating in such actions? I simply feel called to do everything in my power to protect God's planet, his creatures and the people. If we are successful in persuading the government to do what is necessary, the actions I'm taking today will help to prevent a much greater harm - no less than the destruction of everything we hold dear.”

Today's actions are in breach of a High Court injunction imposed on 22nd September, which prohibits “causing the blocking, endangering, slowing down, obstructing or otherwise preventing the free flow of traffic onto or along the M25 motorway for the purpose of protesting.” [1]

ENDS

Press contact: 07737 457105

Email: insulatebritainpress@protonmail.com

High quality photos and video footage available here:

<https://drive.google.com/drive/folders/1Kucg->

682s Chat!

Website: <https://www.insulatebritain.com/>

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

Twitter: <https://twitter.com/insulatelove?lang=en>

Youtube: <https://www.youtube.com/channel/UC8N5mAeeCLbD-AFUqtPaF0g>

Notes to Editors

[1] <https://highwaysengland.co.uk/media/wcufrac5/national-highways-limited-v-persons-unknown-approved-order-21-09-21.pdf>

About Insulate Britain

Insulate Britain is a new campaign group that is calling on the UK government to put in place policy and funding for a national home insulation programme starting with all social housing.

We demand the Prime Minister and the government to #getonwiththejob, face up to their responsibility and lead our country through the climate crisis.

We are ordinary British citizens with simple and achievable demands to #INSULATEBRITAIN

The UK government must immediately promise to fully fund and take responsibility for the insulation of all social housing in Britain

We demand a national home insulation strategy that gives British people the justice they deserve: a future for our loved ones, lower energy bills and safer living conditions

We are scared: our livelihoods are at risk and the futures of our children uncertain

683s Chat!

The Climate Crisis is a threat to all: we demand the government to act now

Our Demands

1. That the UK government immediately promises to fully fund and take responsibility for the insulation of all social housing in Britain by 2025;
2. That the UK government immediately promises to produce within four months a legally binding national plan to fully fund and take responsibility for the full low-energy and low-carbon whole-house retrofit , with no externalised costs, of all homes in Britain by 2030 as part of a just transition to full decarbonisation of all parts of society and the economy.

Further information about Insulate Britain and our demands here:

<https://www.insulatebritain.com/>

Technical Report on home energy efficiency here:

<https://drive.google.com/file/d/1HtOQmArzkDxhIYJrv9IBcl9IOUwfKoe7/view>

ring2021@protonmail.com



©2021 by My Site. Proudly created with Wix.com

684s Chat!



BREAKING: INSULATE BRITAIN RETURNS TO BLOCK M25 FOR

THIRD DAY THIS WEEK

30th September AM

**BREAKING: INSULATE BRITAIN RETURNS TO BLOCK M25 FOR THIRD DAY
THIS WEEK**

Insulate Britain has blocked the M25 for the third day this week with an action at Junction 30.

This follows an action on Tuesday at Heathrow and two actions yesterday at Swanley (Junction 3).

A spokesperson for Insulate Britain said:

“ We are raising the tempo this week as, despite the urgency of the situation, there has been no meaningful response from the government to our demands. We are deeply concerned that with rising fuel bills and not enough action on insulation, there will be further unnecessary suffering and deaths among the most vulnerable this winter.

“It's not just cold and hungry Britain, it's billions of pounds wasted on fuel costs for everyone. Failing to help hardworking families, failing to stop poverty fuel deaths, failing to protect the country we love from the biggest threat it has ever faced. We need our government to keep us safe. Boris, get on with the job.”

Today's actions are in breach of a High Court injunction imposed on 22nd September, which prohibits “causing the blocking, endangering, slowing down, obstructing or otherwise preventing the free flow of traffic onto or along the M25 motorway for the purpose of protesting.”

ENDS

Press contact: 07737 457105

Email: insulatebritainpress@protonmail.com

High quality photos and video footage available here:

<https://drive.google.com/drive/folders/1Kucq-NfhZLGJWwLx1HX03cWR7M9Y2-m>

Website: <https://www.insulatebritain.com/>

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

Twitter: <https://twitter.com/insulatelove?lang=en>

Youtube: <https://www.youtube.com/channel/UC8N5mAeeCLbD-AFUqtPaF0g>

Notes to Editors

[1] <https://highwaysengland.co.uk/media/wcufrac5/national-highways-limited-v-persons-unknown-approved-order-21-09-21.pdf>

About Insulate Britain

Insulate Britain is a new campaign group that is calling on the UK government to put in place policy and funding for a national home insulation programme starting with all social housing.

We demand the Prime Minister and the government to [#getonwiththejob](#), face up to their responsibility and lead our country through the climate crisis.

We are ordinary British citizens with simple and achievable demands to [#INSULATEBRITAIN](#)

The UK government must immediately promise to fully fund and take responsibility for the insulation of all social housing in Britain

687s Chat!

We demand a national home insulation strategy that gives British people the justice they deserve: a future for our loved ones, lower energy bills and safer living conditions

We are scared: our livelihoods are at risk and the futures of our children are uncertain

The Climate Crisis is a threat to all: we demand the government to act now

Our Demands

1. That the UK government immediately promises to fully fund and take responsibility for the insulation of all social housing in Britain by 2025;
2. That the UK government immediately promises to produce within four months a legally binding national plan to fully fund and take responsibility for the full low-energy and low-carbon whole-house retrofit , with no externalised costs, of all homes in Britain by 2030 as part of a just transition to full decarbonisation of all parts of society and the economy.

Further information about Insulate Britain and our demands here:

<https://www.insulatebritain.com/>

Technical Report on home energy efficiency here:

<https://drive.google.com/file/d/1HtOQmArzkDxhIYJrv9IBcl9IOUwfKoe7/view>

ring2021@protonmail.com

©2021 by My Site. Proudly created with Wix.com

Witness statement on behalf of the Claimant
Antony Nwanodi
1st
AN/1 - AN/4
30th September 2021
Claim No. QB-2021-003626

IN THE HIGH COURT OF JUSTICE

QUEEN'S BENCH DIVISION

B E T W E E N

NATIONAL HIGHWAYS LIMITED

Claimant

-and-

**PERSONS UNKNOWN CAUSING THE BLOCKING, SLOWING DOWN,
OBSTRUCTING OR OTHERWISE INTERFERING WITH THE FLOW OF
TRAFFIC ONTO OR OFF OR ALONG THE A2, A20 AND A2070 TRUNK ROADS
AND M2 AND M20 MOTORWAY FOR THE PURPOSE OF PROTESTING**

Defendant

**WITNESS STATEMENT OF
ANTONY NWANODI**

I, Antony Nwanodi, of the Government Legal Department, 102 Petty France, Westminster, London SW1H 9GL will say as follows:

1. I am the lawyer with conduct of this matter on behalf of the Claimant. I make this statement in support of the Claimant's applications for orders that:
 - a. A number of Chief Constables disclose the names and addresses of protestors removed from the A2, A20 and A2070 Trunk roads and M2 and M20 motorway ("the Roads") to the Claimant, and additionally all material relevant to enforcement of the injunction of the Honourable Mr Justice Cavanaugh of 24 September 2021. Since this application is made at the request of the police, it is hoped that it is not opposed by the Chief Constables concerned.
 - b. The requirement for personal service of the injunction be dispensed with, and alternative service be permitted.

c. Named defendants be added to the proceedings as set out in the annexe to the draft Order.

2. Identical issues have arisen in this case and the other claim in which the Claimant has obtained an interim injunction in respect of the M25 roads (Order of the Honourable Mr Justice Lavender of 21st September 2021). For that reason, the same application has been issued in each case (supported by a very similar statement). It is respectfully suggested that the two applications should be considered together for convenience and saving of time.

Background

3. Starting on 13th September 2021 the group 'Insulate Britain' began a number of protests. Those protests involved individuals running onto the motorway and remaining there. A number of protestors used glue and other methods to secure themselves to the surface of the highway and serious disruption was caused to the flow of the traffic and to the ability of other road users to pass along the motorway.

4. The Claimant is responsible for the operation, maintenance and improvement of the United Kingdom's motorways and major A roads ('the Strategic Road Network'). It is responsible for the M25 and for other highways which have been the subject of protests by Insulate Britain.

5. The Claimant considers that the protests organised by Insulate Britain are extremely dangerous. When entering the motorway there is a substantial risk to the life of the protestors and lawful road users. The vehicles on these roads usually travel at 70 MPH (or faster) and drivers may not react swiftly enough to an unexpected pedestrian incursion. The Claimant is also aware that the disruption and gridlock caused by the protests has imperilled life in other ways: ambulance and other emergency service vehicles are reported to have struggled to make good time when responding to emergencies. Further, serious disruption is caused to other road users and they are prevented from exercising their ordinary rights to pass and repass along the highway.

6. In the light of the danger and disruption caused by the protests the Claimant initiated these proceedings (and other similar applications) seeking an injunction against the protestors. An interim injunction was granted by the Honourable Mr Justice Lavender in respect of the M25

on 21st September 2021 (“the M25 injunction”). An interim injunction was granted by the Honourable Mr Justice Cavanagh in respect of the A2, A20, A2070, M2 and M20 on 24th September 2021 (“the Kent injunction”). I produce and exhibit those orders as exhibit AN/1.

7. Each of the injunctions includes a recital recording an undertaking given by the Claimant “to identify and name Defendants and apply to add them as named Defendants to this Order as soon as reasonably practicable”. The injunctions also prohibit protestors from refusing to leave when ordered to by *inter alia* ‘a police constable’.
8. Having obtained injunctions discussions occurred with the police forces whose officers were likely to be deployed to the protests. Much of this discussion occurred under the aegis of the National Police Coordination Centre (‘NPoCC’). Those discussions are continuing.
9. Stephen Bramley CBE is the Director of Legal Services of the Metropolitan Police. In this case he has worked through NPoCC to coordinate the approach being taken to the Court’s interim injunctions by the police. In particular, he has been liaising with the Claimant as to the correct approach to be taken to providing information to the Claimant so as to allowing the Claimant’s representatives to serve the injunctions on protestors, and to evidence breaches of the injunctions.
10. In relation to the first of those issues, the Claimant asked the various police forces involved to share the name and address of protestors arrested on the highways. Until the Claimant is provided with the name and address of all of the protestors it cannot add them as named Defendants to the proceedings. In such circumstances the orders’ impact and enforceability is undermined and the Claimant cannot comply with the undertaking it gave when each injunction was granted. Whilst some of these names have now been provided by some of the forces, Mr Bramley remains concerned as to the scope of information that can be shared with NH and it has not been possible therefore to obtain all of the information as to identities held by the police.
11. By an email sent to me and several others at 16:57 on 23rd September he explained (emphasis in the original):

...lawyers for all forces responsible for policing the M25 (MPS, Essex, Kent, Surrey, Thames valley, Herts) have agreed:

- **It is safest for all concerned for officers to continue their task of removing protesters from the motorway and establishing their names and addresses.** We know at least 104 have been identified this way so far

- **We don't recommend that high court enforcement officers are involved at this stage in serving them with the unamended injunction**

- **Instead we would consent to NH applying to the high court for an order under CPR 31.17/18 requiring disclosure by those forces of identifying information of such protesters.** We believe this should be a speedy and straightforward process

- Upon forces furnishing NH with such identifying information, **NH then apply to the court to amend the injunction to:**

(i) Add named defendants

...

- This would enable **enforcement officers to serve the amended injunction personally on named defendants** at their home addresses- safer for all concerned

- The need for a protocol to enable enforcement officers to serve the amended injunction personally in a motorway setting would be secondary, and contingent on the named defendants not being contactable at the address given. Police lawyers can consider further the terms of an amended protocol to provide for this, and also for a further pack of evidence to be gathered by police to enable a committal application to be made in due course

...

12. Following discussions, over the weekend of 25th/26th September, a protocol and memorandum of understanding was put together between NH and Mr Bramley, to allow for some information sharing. Despite this, the Police view was that they required a Court order, to be able to share both the name and address of protestors and evidence of breaches of the

injunctions with the Claimant. Whilst there has been some information sharing, and there is a willingness to co-operate at some level at least, the position is far from certain given the earlier statements by the Police and the Claimant does not consider that it is acceptable to allow the uncertainty to continue given the continuing protests and multiple and deliberate breaches of the Court's orders.

13. For that reason, it is necessary to make this application pursuant to CPR 31.17 to make the position with regard to disclosure clear to the Police and to enable the Court orders to be served and to take steps to enable those orders to be enforced. On the basis of Mr Bramley's email it is expected that the various police forces will not oppose the making of an order that they disclose the name and address of each arrested person to the Claimant, and, for the purposes of the proceedings and in particular to take steps to enforce the Court orders, to the forces sharing evidence of breaches of the injunction, such as body worn video footage showing protestors in the road and other evidential material. However, very recent communications with Mr Bramley suggest that there may be some resistance to an order which, absent a clear and unequivocal commitment to disclose the materials sought (which may only be used in the context of proceeding as provided for in CPR Part 31.22) – which strengthens the need to obtain it since it underlines the uncertainty in the position of the Police with regard to sharing information necessary to the civil proceedings.

The necessity of disclosure

14. The names and addresses, and evidence of breaches of the Court's orders constitute material likely to support the Claimant's case and/or to adversely affect the case of the Defendants. Without the provision of information to the identify and addresses of the Defendants, and demonstrating breaches of order, it will be impossible to proceed with the case and to enforce the orders obtained, and thus to restore the proper use of the motorways and the rights of the public over them.. Moreover, the information would allow the Claimant to comply with the undertaking given to Mr Justice Lavender.
15. Furthermore, the disclosure is necessary because without it the interests of both the Claimant and the Defendants are prejudiced. In respect of the Claimant this is because the injunction proceedings are undermined. In respect of the Defendants prejudice arises because unless the protestors are named in the proceedings their ability to contest the injunction is impaired

although it is clear that their own website has links on it to the Court orders, as does the Claimant's website. I exhibit these as AN/2¹.

Conclusion on disclosure

16. In the circumstances the court is requested to make this order pursuant to CPR 31.17 and that in the circumstances it is appropriate and proportionate to do so.

Service of the proceedings and the Orders

17. The Honourable Mr Justice Cavanaugh ordered personal service of the injunction made on 24 September. The Claimants obtained some definitive information concerning the identities of the Defendants for the first time from the police on Monday 27th September. The Claimant has sought to effect personal service on the individuals identified thus far.
18. In a number of cases, personal service has not been possible. I have spoken to the High Court Enforcement Group (who are seeking to effect service for the Claimant), and have been told that in some cases this was due to the individuals refusing service (presumably being tipped off that it was incoming), and in other cases because the individuals are not at their home address, but residing elsewhere. I was told on a call at 2.30pm on 29 September that to date there had been 76 visits by process servers, 11 successful, 65 unsuccessful visits. There were 29 remaining at that time.
19. I exhibit as AN/3 a report sheet which I received at 16:26 from HCEG on 29 September showing various failed attempts at personal service, in various cases there being no response or the process server being told the individual in question was away.

Alternative service

20. The Court is respectfully requested to allow alternative service of the claim form and injunction pursuant to CPR r.6.15 and r.6.27.

¹ <https://www.insulatebritain.com/injunction-what-injunction;>
[https://highwaysengland.co.uk/media/wcufrac5/national-highways-limited-v-persons-unknown-approved-order-21-09-21.pdf;](https://highwaysengland.co.uk/media/wcufrac5/national-highways-limited-v-persons-unknown-approved-order-21-09-21.pdf) [https://highwaysengland.co.uk/media/s5vocubs/interim-injunction-a20-et-al-sealed-202210924.pdf\]](https://highwaysengland.co.uk/media/s5vocubs/interim-injunction-a20-et-al-sealed-202210924.pdf)

21. Notwithstanding the existence of the injunctions, which have been publicised in the press and on Insulate Britain's own website the "Insulate Britain" protesters have continued to obstruct the enjoined highways, in open defiance of the Court's Orders, and showing clear knowledge of the Court's Orders [see: <https://www.insulatebritain.com/injunction-what-injunction>]: see AN/2. Indeed, the Insulate Britain website provides links (which work, as of 29th September) to copies of the injunctions in force [<https://www.insulatebritain.com/insulate-britain-returns-to-block-m25-junction-for-the-second-time-today>]. The group is clearly aware of the existence of the injunctions. I exhibit these pages as AN/4. I can confirm that the links provided lead to the Court Orders and allow them to be read and downloaded.
22. I should draw to the Court's attention that some of the Police forces involved may be willing to allow service of those arrested after they have completed the charging process at the police station, but this is unlikely to enable service to be effected on all of those whose names and addresses have already been given (though there are persons whose names have appeared on a number of occasions who may be arrested again, but this is not certain).
23. Service, which has to date not been possible despite attempts by process servers, is a prerequisite to enforcing the Order of the Court by bringing committal proceedings. The inability to serve the Defendants' personally means the Claimant is hampered in its ability to enforce the Orders of the Court, and since the protesters are clearly willing to act in open defiance of the Court Orders, it seems that committal proceedings will likely be the only means of enforcing the Orders of the Court and preventing the deleterious effects of the protests on the road network.

Conclusion on service

24. The Court is respectfully requested to grant an order permitting alternative service by one or more of the following means:
- a. Publication of the injunction on the "Insulate Britain" website [<https://www.insulatebritain.com/>] which contains links to the Court Orders
 - b. The Claimant to post the injunction on the "Insulate Britain" Facebook page [<https://www.facebook.com/insulatebritain>].

Witness statement on behalf of the Claimant

Antony Nwanodi

1st

AN/1 - AN/4

30th September 2021

- c. The Claimant to post sealed copies on its own web page [<https://highwaysengland.co.uk/media/wcufrac5/national-highways-limited-v-persons-unknown-approved-order-21-09-21.pdf>].
- d. The Claimant to serve by posting a copy of the order through the letterbox of each Defendant with a notice affixed to the front door if necessary, drawing the recipients attention to the fact the package contains a court order. In the event that the premises do not have a letter box, a package containing the Court orders and the proceedings may be affixed to the front door marked with a notice drawing attention to the fact that the package contains a court order and should be read urgently (see details in draft Order).

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

Name:.....Antony Nwanodi.....

Signature:...



Date:.....30 September 2021.....

Witness statement on behalf of the Claimant
Antony Nwanodi
1st
AN/1 - AN/4
30th September 2021
Claim No. QB-2021-003626

IN THE HIGH COURT OF JUSTICE

QUEEN'S BENCH DIVISION

B E T W E E N

NATIONAL HIGHWAYS LIMITED

Claimant

-and-

**A2, A20 AND A2070 TRUNK ROADS AND M2 AND M20 MOTORWAY (“THE
ROADS”) TO THE CLAIMANT, AND ADDITIONALLY ALL MATERIAL
RELEVANT TO ENFORCEMENT OF THE INJUNCTION OF THE
HONOURABLE MR JUSTICE CAVANAUGH OF 24 SEPTEMBER 2021**

Defendant

EXHIBIT AN/1

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

Before: Mr Justice Cavanagh

On: 24 September 2021

B E T W E E N:

NATIONAL HIGHWAYS LIMITED

-and-

(1) PERSONS UNKNOWN CAUSING THE BLOCKING, SLOWING DOWN,
OBSTRUCTING OR OTHERWISE INTERFERING WITH THE FLOW OF
TRAFFIC ONTO OR OFF OR ALONG THE A2, A20 AND A2070 TRUNK
ROADS AND M2 AND M20 MOTORWAY FOR THE PURPOSE OF
PROTESTING



Defendants

ORDER

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

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

UPON the Claimant’s claim in trespass and nuisance by Claim Form dated 24 September 2021 (“the Claim”)

AND UPON READING the Claim Form and the Witness Statement of Nicola Bell dated 24 September 2021

AND UPON hearing Michael Fry and Jonathan Welch, Counsel for the Claimant

AND UPON the Claimant indicating that it will provide to the Defendants copies of further evidence or other documents filed in these proceedings upon request, following the Defendants or their representatives providing contact details to the Claimant’s solicitors

AND UPON the Court accepting the Claimant’s undertaking that the Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that this Order has caused loss to a Defendant and the Court finds that the Defendant ought to be compensated for that loss

AND UPON the Claimant undertaking to identify and name Defendants and apply to add them as named Defendants to this Order as soon as reasonably practicable

AND UPON the Claimant confirming that this Order is not intended to prohibit lawful protest which does not slow, obstruct, prevent or otherwise interfere with the flow of traffic onto off or along the A2, A20, A2070, M2 or M20 nor to prevent lawful use of the A2, A20, A2070, M2 or M20 by any person

IT IS ORDERED THAT:

1. For the purposes of this Order, the A2, A20, A2070, M2 and M20 (together the “Roads”) means the roads identified in the plans annexed to this Order including but not limited to the verges, central reservation, on- and off-slip roads, overbridges and underbridges and any apparatus related to that motorway.

Injunction in force

2. With immediate effect and until the earlier of (i) Trial; (ii) Further Order; or (iii) 23.59 pm on 24 March 2022, the Defendants and each of them are forbidden from:
 - 2.1 Blocking, slowing down, obstructing or otherwise interfering with the flow of traffic onto or along or off the Roads for the purpose of protesting.

- 2.2 Blocking, slowing down, obstructing or otherwise interfering with access to or from the Roads, and on any adjacent roads, slip roads or roundabouts which are not vested in the Claimant, for the purpose of protesting.
 - 2.3 Causing damage to the surface of or to any apparatus on or around the Roads including but not limited to painting, damaging by fire, or affixing any item or structure thereto.
 - 2.4 Affixing themselves (“locking on”) to any other person or object on the Roads.
 - 2.5 Erecting any structure on the Roads.
 - 2.6 Tunnelling in the vicinity of the Roads.
 - 2.7 Entering onto the Roads unless in a motor vehicle.
 - 2.8 Abandoning any vehicle or item on the Roads with the intention of causing an obstruction.
 - 2.9 Refusing to leave the area within 50m of the centre of the Roads when asked to do so by a police constable, National Highways Traffic Officer or High Court Enforcement Officer.
 - 2.10 Causing, assisting or encouraging any other person to do any act prohibited by paragraphs 2.1 – 2.9 above.
 - 2.11 Continuing any act prohibited by paragraphs 2.1 – 2.10 above.
3. The Claimant shall:
 - 3.1 Place copies of this Order and the Claim Form on the National Highways and Gov.uk website; and
 - 3.2 Send a copy of this Order and the Claim Form to Insulate Britain’s email address: Insulate Britain ring2021@protonmail.com.
 4. For the avoidance of doubt, compliance with paragraph 3 shall not constitute service.

Further directions

5. 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 immediately (and in any event not less than 48 hours before the hearing of any such application).
6. Any person applying to vary or discharge this order must provide their full name and address, an address for service, and must also apply to be joined as a named defendant to the proceedings at the same time.
7. The Claimant has liberty to apply to extend or vary this Order or for further directions.
8. The return date hearing to be listed for 10.30 am on 5 October 2021 in person.
9. Costs reserved.

Communications with the Claimant

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

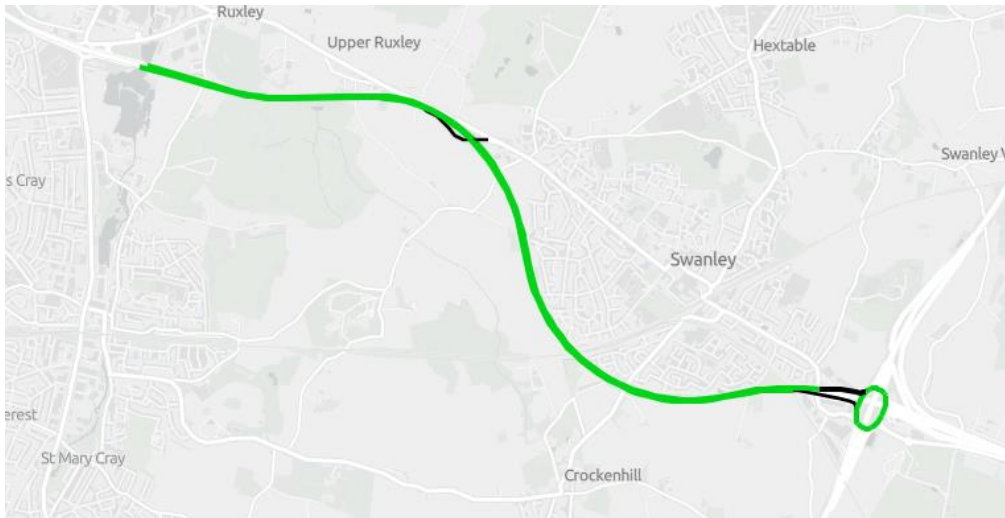
FAO Antony Nwanodi
Government Legal Department,
102 Petty France, Westminster,
London SW1H 9GL
E: tony.nwanodi@governmentlegal.gov.uk
T: 020 7210 3424

BY THE COURT

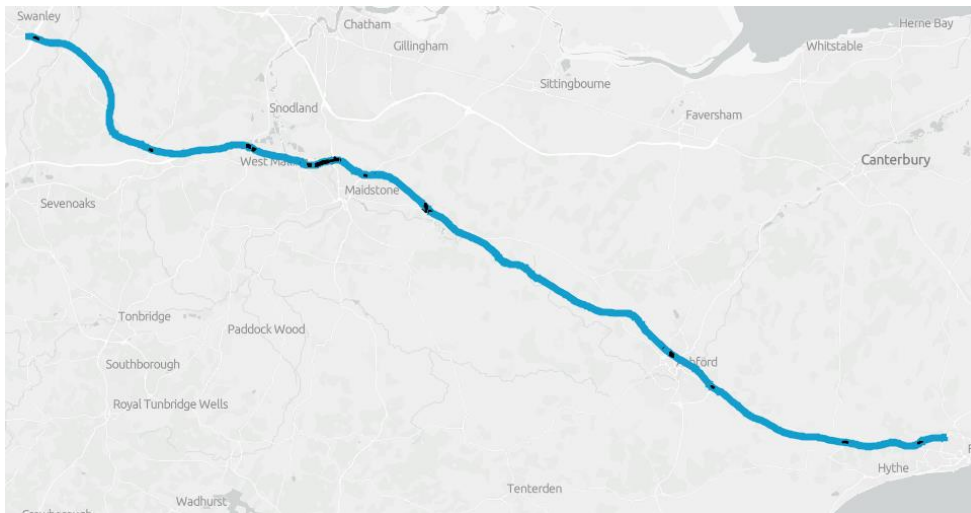
Dated: 24 September 2021

ANNEX TO THE ORDER OF MR JUSTICE CAVANAGH DATED 24 SEPTEMBER 2021

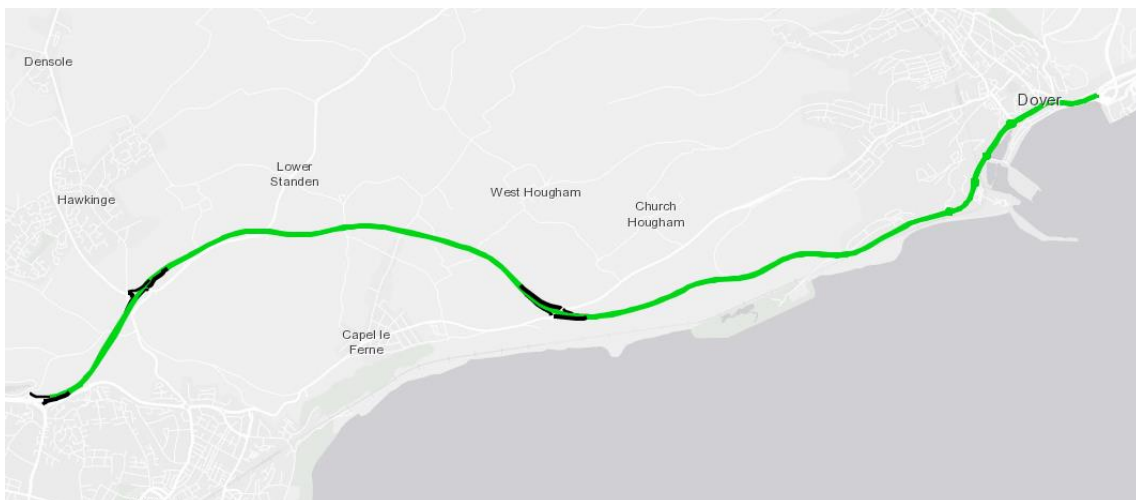
A20 London - M25



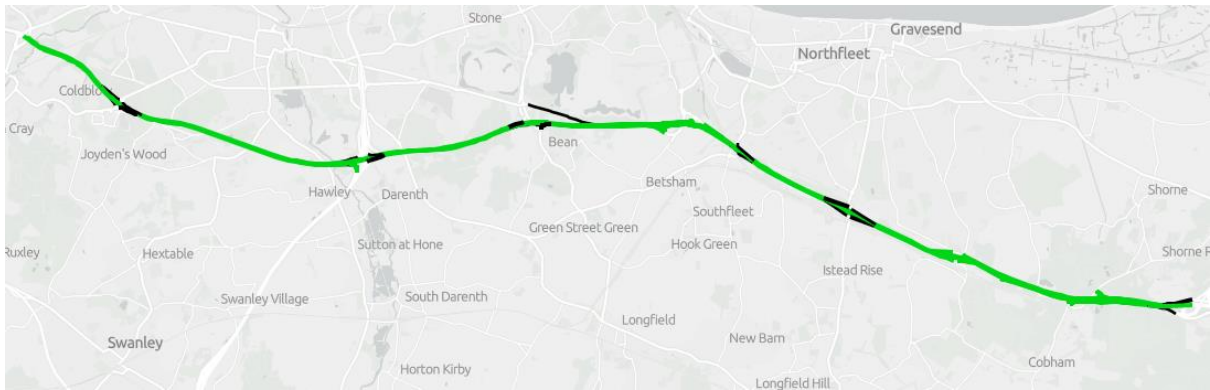
M20



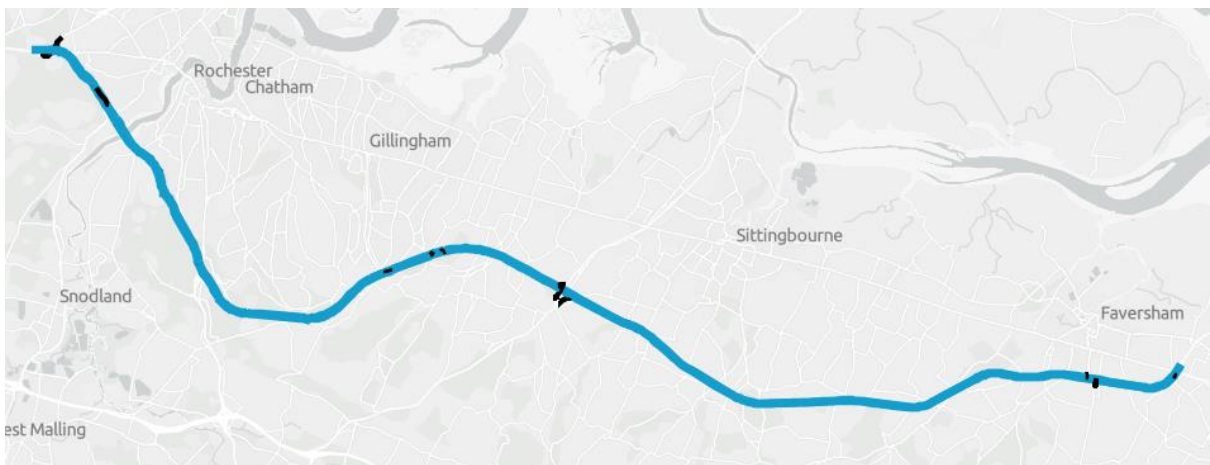
A20 Coast Section



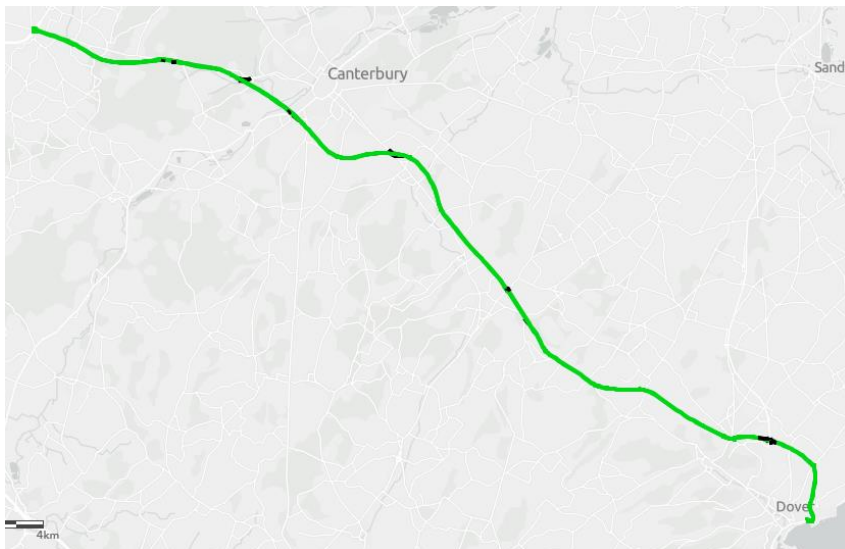
A2 London – M2 Section



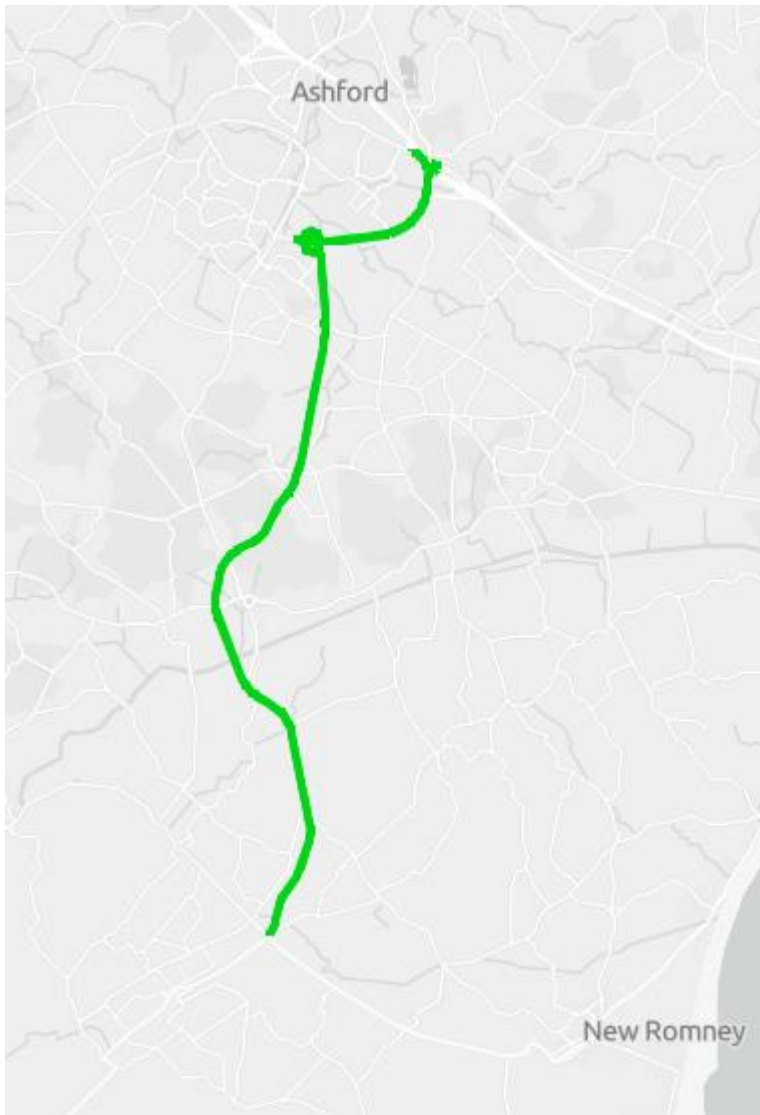
M2



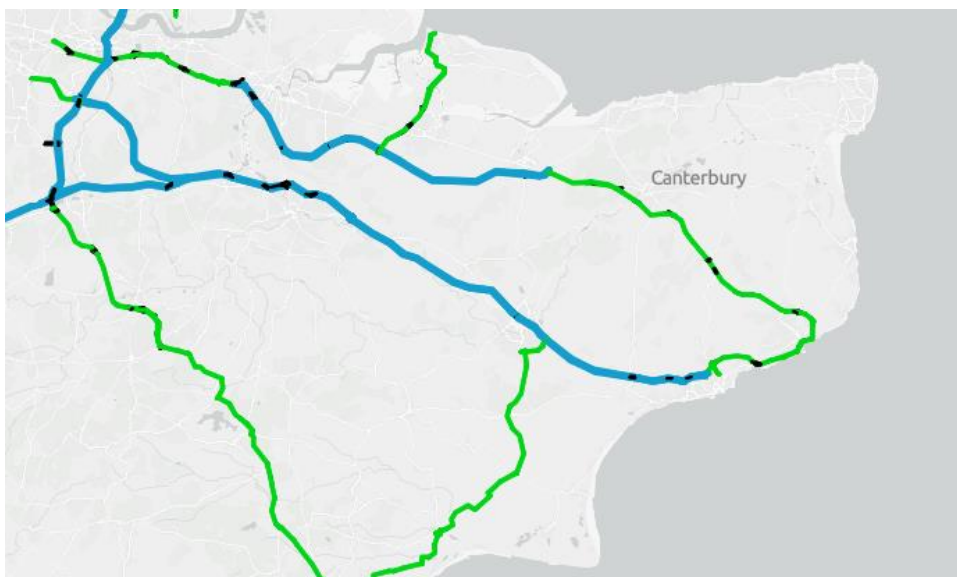
A2 M2 - Dover Section



A2070



Kent & Surrounding areas SRN



Witness statement on behalf of the Claimant

Antony Nwanodi

1st

AN/1 - AN/4

30th September 2021

Claim No. QB-2021-003626

IN THE HIGH COURT OF JUSTICE

QUEEN'S BENCH DIVISION

B E T W E E N

NATIONAL HIGHWAYS LIMITED

Claimant

-and-

**A2, A20 AND A2070 TRUNK ROADS AND M2 AND M20 MOTORWAY (“THE
ROADS”) TO THE CLAIMANT, AND ADDITIONALLY ALL MATERIAL
RELEVANT TO ENFORCEMENT OF THE INJUNCTION OF THE
HONOURABLE MR JUSTICE CAVANAUGH OF 24 SEPTEMBER 2021**

Defendant

EXHIBIT AN/2



INJUNCTION? WHAT INJUNCTION?

28 September, 2021

A total of 115 people have been involved in Insulate Britain's campaign of disruptive actions over the last two weeks, with most being arrested multiple times. The total arrest tally has now reached 438.

Fifteen Insulate Britain supporters have been arrested as many as six times and twenty-one have been arrested five times for their participation in the campaign, which began on September 13th and has involved blocking roads on and around the M25 network and at the Port of Dover.

The total arrest figure includes five people arrested for conspiracy to cause a public nuisance and subsequently released under investigation.

The police are choosing not to detain people involved in the Insulate Britain campaign, although many have been involved in multiple actions, have broken their bail conditions and have expressed a clear intention to continue with the campaign. Only two people from Insulate Britain have so far been remanded in custody.

Yesterday, 52 people blocked the M25, in breach of the terms of an injunction granted to the Highways Agency on 22nd September. [1]

A second injunction was granted on 24th September covering the A2, A20 and A2070 trunk roads and M2 and M20 motorway, after an Insulate Britain action outside the Port of Dover last Thursday. [2]

Insulate Britain says actions will continue until the government makes a meaningful commitment to insulate all of Britain's 29 million leaky homes by 2030, which are among the oldest and most energy inefficient in Europe. [3]

ENDS

Press contact: 07737 457105

Email: insulatebritainpress@protonmail.com

High quality photos and video footage available here:

<https://drive.google.com/drive/folders/1Kucq-NfhNZLGJWwLx1HX03cWR7M9Y2-m>

Website: <https://www.insulatebritain.com/>

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

Twitter: <https://twitter.com/insulatelove?lang=en>

Youtube: <https://www.youtube.com/channel/UC8N5mAeeCLbD-AFUqtPaF0g>

Notes to Editors

[1] <https://highwaysengland.co.uk/media/wcufrac5/national-highways-limited-v-persons-unknown-approved-order-21-09-21.pdf>

[3] About Insulate Britain

Insulate Britain is a new campaign group that is calling on the UK government to put in place policy and funding for a national home insulation programme starting with all social housing.

We demand the Prime Minister and the government to #getonwiththejob, face up to their responsibility and lead our country through the climate crisis.

We are ordinary British citizens with simple and achievable demands to #INSULATEBRITAIN

The UK government must immediately promise to fully fund and take responsibility for the insulation of all social housing in Britain

We demand a national home insulation strategy that gives British people the justice they deserve: a future for our loved ones, lower energy bills and safer living conditions

We are scared: our livelihoods are at risk and the futures of our children are uncertain

The Climate Crisis is a threat to all: we demand the government to act now

Our Demands

1. That the UK government immediately promises to fully fund and take responsibility for the insulation of all social housing in Britain by 2025;
2. That the UK government immediately promises to produce within four months a legally binding national plan to fully fund and take responsibility for the full low-energy and low-carbon whole-house retrofit , with no externalised costs, of all homes in Britain by 2030 as part of a just transition to full decarbonisation of all parts of society and the economy.

Further information about Insulate Britain and our demands here:

<https://www.insulatebritain.com/>

Technical Report on home energy efficiency here:

<https://drive.google.com/file/d/1HtOQmArzkDxhIYJrv9lBcl9lOUwfKoe7/view>

Witness statement on behalf of the Claimant
Antony Nwanodi
1st
AN/1 - AN/4
30th September 2021
Claim No. QB-2021-003626

IN THE HIGH COURT OF JUSTICE

QUEEN'S BENCH DIVISION

B E T W E E N

NATIONAL HIGHWAYS LIMITED

Claimant

-and-

**A2, A20 AND A2070 TRUNK ROADS AND M2 AND M20 MOTORWAY (“THE
ROADS”) TO THE CLAIMANT, AND ADDITIONALLY ALL MATERIAL
RELEVANT TO ENFORCEMENT OF THE INJUNCTION OF THE
HONOURABLE MR JUSTICE CAVANAUGH OF 24 SEPTEMBER 2021**

Defendant

EXHIBIT AN/3

High Court
Enforcement
Group Ltd

Our Ref	Defendant Name	PostCode	Notes
SWN18373PS	Liam Norton	Flat 4 Esplanade Gardens Scarborough North Yorkshire YO11 2AW	Our Process Server attended Flat 4, Esplanade Gardens, Scarborough, North Yorkshire, YO11 2AW on Wednesday 29 September 2021 at 06:00. The residential flat property is in fair condition. Process Server's comments: Gained access into the communal area and located a letterbox for "Norton". There was no response via the intercom on the first try, on the 2nd a female responded, asking me to identify myself, I did so and she stated I would have to call back later. I asked to speak to Liam Norton, she advised he is "definitely" not here. This may potentially be the mother's address, a Theresa Norton, as we also have documents for this person. At this time I have been unable to serve documents.
SWN18375PS	Christian Leslie Murray	122 Derby Road Melbourne Derby Derbyshire DE73 8FL	Our Process Server attended 122 Derby Road, Melbourne, Derby, Derbyshire, DE73 8FL on Wednesday 29 September 2021 06:17 hours. The residential detached property is in fair condition. Process Server's comments: No contact at the address, there was a large dog behind the front door.
SWN18381PS	Gabriella Ditton	189 Silver Road Norwich NR3 4TL	Our Process Server attended 189 Silver Road, Norwich, NR3 4TL on Wednesday 29 September 2021 at 08:47 hours. The residential terrace property is in fair condition. Process Server's comments: No contact made at the property.
SWN18389PS	Amy Pritchard	9 Gainsford Road London E17 6QB	Our Process Server attended 9 Gainsford Road, London, E17 6QB on Wednesday 29 September 2021 at 08:08 hours. The residential semi detached property is in fair condition. Process Server's comments: I was unable to get a response from the property and able to confirm residency.
SWN18431PS	Anne Taylor	100 Walton Street Oxford Oxfordshire OX2 6EB	Our Process Server attended 100 Walton Street, Oxford, Oxfordshire, OX2 6EB on Wednesday 29 September 2021 at 08:05 hours. The residential terrace property is in fair condition. Process Server's comments: There was no answer from the property. The neighbour at No. 101 stated it is her mother. The female stated that the defendant was currently not at home and does not know when she will return.

SWN18517PS	Ian Bates	52 CLARKE ROAD NORTHAMPTON NORTHAMPTON SHIRE NN1 4PW	Our Process Server attended 52 Clarke Road, Northampton, Northamptonshire, NN1 4PW on Wednesday 29 September 2021 at 09:46 hours. The residential terrace property is in fair condition. Process Server's comments: A male answered the door and stated that he rents the property from the Defendant but that the Defendant does not live there. The male stated that he just pays the Defendant rent, he has no bills or anything. A driving licence was shown as proof of identification but this did have a different address. The male provided me with a contact number for the Defendant. I proceeded to call the mobile number which went to a voicemail message of himself stating that he is away for 3 weeks from the 13th September.
SWN18559PS	Serena Schellenberg	Little Gates Church Road Hellingly East Sussex BN27 4EX	Our Process Server attended Little Gates, Church Road, Hellingly, East Sussex, BN27 4EX on Wednesday 29 September 2021. The residential terrace property is in fair condition. Process Server's comments: Upon attendance, contact was made with an adult male who stated the Defendant is out and he doesn't know what time she will be back. The adult male confirmed it is her property and that he is just a friend visiting.
SWN18573PS	Tracey Mallaghan	4 Brushford Close Furzton Milton Keynes MK4 1EG	Our Process Server attended 4 Brushford Close, Furzton, Milton Keynes, MK4 1EG on Wednesday 29 September 2021. The residential detached property is in fair condition. Process Server's comments: As I drove past the property a vehicle drove onto the driveway. I knocked on the front door, which was answered by an adult female. I asked for Tracey Mallaghan and I was informed that she does reside at the address, however she has not been home for three weeks and has been in London dealing with the M25 staff. The person I spoke with, confirmed she is the Defendant's mother.
SWN18575PS	Tyrone Hodge	1 Peskett Close Barns Green Horsham West Sussex RH13 0PY	Our Process Server attended 1 Peskett Close, Barns Green, Horsham, West Sussex, RH13 0PY on Wednesday 29 September 2021. The residential semi-detached property is in fair condition. Process Server's comments: I attended the address and spoke with builders outside the property. They confirmed they did not know of a Tyrone Hodge at the address and that "Sophie" and "George" live at the address. Upon knocking the front door, I made contact with Sophie. She stated that the Defendant used to reside at the address with his nan, but when she passed away, he vacated. Sophie went on to say that they still receive post for Tyrone, one was a letter from Specsavers regarding some stolen sunglasses and some Court letters.

SWN18549PS	Matthew Lunnon	11 Pantglas Pentrych Cardiff CF15 9TH	<p>Our Process Server attended 11 Pantglas, Pentrych, Cardiff, CF15 9TH on Wednesday 29 September 2021 at 09:01 hours. The residential detached property is in fair condition.</p> <p>Process Server's comments: I met with Mr Lunnon's wife at the address who stated that he was not here this week, he was away. Mrs Lunnon advised that she had an address at which he was staying along with a telephone number, both of which were provided to me. Address: 17 Spring Hill, Stroud, Gloucester, GL5 1TN. Telephone Number: 07837 988103 Mrs Lunnon stated that this is where he is this week.</p>
SWN18361PS	Mary Adams	303 Granite Apartments 30 River Walk Greenwich London SE10 0GA	<p>Our Process Server attended 303 Granite Apartments, 30 River Walk, Greenwich, London, SE10 0GA on Wednesday 29 September 2021 at 13:51 hours. The residential flat property is in fair condition.</p> <p>Process Server's comments: There was no answer at the intercom to the building and I was unable to gain access via any other means.</p>
SWN18352PS	Stephanie Aylett	51 High Oaks St. Albans Hertfordshire AL3 6EL	<p>Our Process Server attended 51 High Oaks, St. Albans, Hertfordshire, AL3 6EL on Wednesday 29 September 2021 at 12:57 hours. The residential detached property is in fair condition.</p> <p>Process Server's comments: I met with a male at the address who confirmed that the Defendant resides there but isn't there at the moment. The male stated that he does not know where she is or have a contact number for her.</p>

Witness statement on behalf of the Claimant
Antony Nwanodi
1st
AN/1 - AN/4
30th September 2021
Claim No. QB-2021-003626

IN THE HIGH COURT OF JUSTICE

QUEEN'S BENCH DIVISION

B E T W E E N

NATIONAL HIGHWAYS LIMITED

Claimant

-and-

**A2, A20 AND A2070 TRUNK ROADS AND M2 AND M20 MOTORWAY (“THE
ROADS”) TO THE CLAIMANT, AND ADDITIONALLY ALL MATERIAL
RELEVANT TO ENFORCEMENT OF THE INJUNCTION OF THE
HONOURABLE MR JUSTICE CAVANAUGH OF 24 SEPTEMBER 2021**

Defendant

EXHIBIT AN/4



INSULATE BRITAIN RETURNS TO BLOCK M25 JUNCTION FOR

THE SECOND TIME TODAY

29 September, 2021

Insulate Britain has returned for the second time today to block the M25 at Swanley (Junction 3).

This follows an earlier action at the same junction which took place at 7.30am, where Insulate Britain supporters sat down on the carriageway, gluing their hands to each other and the road, while others poured oil onto the carriageway.

Revd Sue Parfitt from Bristol, who was involved in the first of today's actions said earlier:

“Many people will ask why a 79 year old Anglican Priest is sitting in the road, causing disruption and how can I justify participating in such actions? I simply feel called to do everything in my power to protect God's planet, his creatures and the people. If we are successful in persuading the government to do what is necessary, the actions I'm taking today will help to prevent a much greater harm - no less than the destruction of everything we hold dear.”

Today's actions are in breach of a High Court injunction imposed on 22nd September, which prohibits “causing the blocking, endangering, slowing down, obstructing or otherwise preventing the free flow of traffic onto or along the M25 motorway for the purpose of protesting.” [1]

ENDS

Press contact: 07737 457105

Email: insulatebritainpress@protonmail.com

High quality photos and video footage available here:

<https://drive.google.com/drive/folders/1Kucg->

717s Chat!

Website: <https://www.insulatebritain.com/>

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

Twitter: <https://twitter.com/insulatelove?lang=en>

Youtube: <https://www.youtube.com/channel/UC8N5mAeeCLbD-AFUqtPaF0g>

Notes to Editors

[1] <https://highwaysengland.co.uk/media/wcufrac5/national-highways-limited-v-persons-unknown-approved-order-21-09-21.pdf>

About Insulate Britain

Insulate Britain is a new campaign group that is calling on the UK government to put in place policy and funding for a national home insulation programme starting with all social housing.

We demand the Prime Minister and the government to #getonwiththejob, face up to their responsibility and lead our country through the climate crisis.

We are ordinary British citizens with simple and achievable demands to #INSULATEBRITAIN

The UK government must immediately promise to fully fund and take responsibility for the insulation of all social housing in Britain

We demand a national home insulation strategy that gives British people the justice they deserve: a future for our loved ones, lower energy bills and safer living conditions

We are scared: our livelihoods are at risk and the futures of our children uncertain

718s Chat!

The Climate Crisis is a threat to all: we demand the government to act now

Our Demands

1. That the UK government immediately promises to fully fund and take responsibility for the insulation of all social housing in Britain by 2025;
2. That the UK government immediately promises to produce within four months a legally binding national plan to fully fund and take responsibility for the full low-energy and low-carbon whole-house retrofit , with no externalised costs, of all homes in Britain by 2030 as part of a just transition to full decarbonisation of all parts of society and the economy.

Further information about Insulate Britain and our demands here:

<https://www.insulatebritain.com/>

Technical Report on home energy efficiency here:

<https://drive.google.com/file/d/1HtOQmArzkDxhIYJrv9IBcl9IOUwfKoe7/view>

ring2021@protonmail.com



©2021 by My Site. Proudly created with Wix.com



BREAKING: INSULATE BRITAIN RETURNS TO BLOCK M25 FOR

THIRD DAY THIS WEEK

30th September AM

**BREAKING: INSULATE BRITAIN RETURNS TO BLOCK M25 FOR THIRD DAY
THIS WEEK**

Insulate Britain has blocked the M25 for the third day this week with an action at Junction 30.

This follows an action on Tuesday at Heathrow and two actions yesterday at Swanley (Junction 3).

A spokesperson for Insulate Britain said:

“ We are raising the tempo this week as, despite the urgency of the situation, there has been no meaningful response from the government to our demands. We are deeply concerned that with rising fuel bills and not enough action on insulation, there will be further unnecessary suffering and deaths among the most vulnerable this winter.

“It's not just cold and hungry Britain, it's billions of pounds wasted on fuel costs for everyone. Failing to help hardworking families, failing to stop poverty fuel deaths, failing to protect the country we love from the biggest threat it has ever faced. We need our government to keep us safe. Boris, get on with the job.”

Today's actions are in breach of a High Court injunction imposed on 22nd September, which prohibits “causing the blocking, endangering, slowing down, obstructing or otherwise preventing the free flow of traffic onto or along the M25 motorway for the purpose of protesting.”

ENDS

Press contact: 07737 457105

Email: insulatebritainpress@protonmail.com

High quality photos and video footage available here:

<https://drive.google.com/drive/folders/1Kucq-NfhNZLGJWwLx1HX03cWR7M9Y2-m>

Website: <https://www.insulatebritain.com/>

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

Twitter: <https://twitter.com/insulatelove?lang=en>

Youtube: <https://www.youtube.com/channel/UC8N5mAeeCLbD-AFUqtPaF0g>

Notes to Editors

[1] <https://highwaysengland.co.uk/media/wcufrac5/national-highways-limited-v-persons-unknown-approved-order-21-09-21.pdf>

About Insulate Britain

Insulate Britain is a new campaign group that is calling on the UK government to put in place policy and funding for a national home insulation programme starting with all social housing.

We demand the Prime Minister and the government to [#getonwiththejob](#), face up to their responsibility and lead our country through the climate crisis.

We are ordinary British citizens with simple and achievable demands to [#INSULATEBRITAIN](#)

The UK government must immediately promise to fully fund and take responsibility for the insulation of all social housing in Britain

722s Chat!

We demand a national home insulation strategy that gives British people the justice they deserve: a future for our loved ones, lower energy bills and safer living conditions

We are scared: our livelihoods are at risk and the futures of our children are uncertain

The Climate Crisis is a threat to all: we demand the government to act now

Our Demands

1. That the UK government immediately promises to fully fund and take responsibility for the insulation of all social housing in Britain by 2025;
2. That the UK government immediately promises to produce within four months a legally binding national plan to fully fund and take responsibility for the full low-energy and low-carbon whole-house retrofit , with no externalised costs, of all homes in Britain by 2030 as part of a just transition to full decarbonisation of all parts of society and the economy.

Further information about Insulate Britain and our demands here:

<https://www.insulatebritain.com/>

Technical Report on home energy efficiency here:

<https://drive.google.com/file/d/1HtOQmArzkDxhIYJrv9IBcl9IOUwfKoe7/view>

ring2021@protonmail.com

©2021 by My Site. Proudly created with Wix.com

Your reference

Our reference

LNH/PXB/439241/15
UKM/133659140.1

By Email Only

19 April 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 write further to our letter of 28 March 2024 enclosing NHL’s application (and supporting documents) dated 27 April 2024 for the continuation of the Cotter Injunction (the “**Application**”).

We enclose, by way of service, the Witness Statement of Petra Billing dated 18 April 2024 with Exhibit PXB1 which has been filed with the Court to provide updates on:

- i. the steps that NHL has taken to serve the Application and supporting documents;
- ii. the consent given by the Police to the third-party disclosure order sought in the Application; and
- iii. pertinent press releases and social media published by JSO since the Application and supporting documents were filed with the Court.

Personal data has been redacted in the Exhibit.

We have already made you aware that 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 extend the Cotter Injunction (“**Review Hearing**”). The Court has confirmed that the time estimate for the hearing has now been extended to half a day.

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>.

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

NHL's Skeleton Argument and the Hearing Bundle (including this letter and enclosures) for the Review Hearing will be made available on NHL's Injunction Website at <https://nationalhighways.co.uk/about-us/high-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.

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.