

N244

Application notice

For help in completing this form please read the notes for guidance form N244 Notes.

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Name of court High Court of Justice Business and Property Courts of England and Wales Business List (Ch D)		Claim no. PT-2022-000303									
Fee account no. (if applicable)	Help with Fees - Ref. no. (if applicable)										
PBA0088070	<table border="1"> <tr> <td>H</td> <td>W</td> <td>F</td> <td>-</td> <td></td> <td></td> <td>-</td> <td></td> <td></td> </tr> </table>		H	W	F	-			-		
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Warrant no. (if applicable)											
Claimant's name (including ref.) (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited (UK01-000162.00301)											
Defendant's name (including ref.) Persons Unknown as more particularly described in the Claim Form											
Date	24 October 2025										

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

Fieldfisher LLP

2. Are you a ☐ Claimant ☐ Defendant ☒ Legal Representative
- ☐ Other (please specify)

If you are a legal representative whom do you represent?

The Claimants

3. What order are you asking the court to make and why?

An Order pursuant to CPR Part 17 that the Claimants be permitted to amend the Claim Form and Particulars of Claim to change the description of the Defendants and that the Order of Mr Simon Gleeson (sitting as a Judge of the Chancery Division) dated 6 October 2023 (the "**Gleeson Order**") be amended to change the description of the Defendants accordingly, as provided for in the attached draft Order. The Claimant believes:

- That there is a risk that the membership of the Defendants (as currently described) will evolve into a different organisation or campaign undertaking unlawful activity at the sites which the Gleeson Order currently seeks to protect;
- A different organisation or campaign with the same aim and goals as the Defendants (as currently described) undertaking unlawful activity at the sites would not currently be prohibited by the terms of the Gleeson Order; and
- Amending the description of the Defendants in the Gleeson Order, the Claim Form and the Particulars of Claim would ensure that the purpose of the final injunction (as granted by the Gleeson Order) is not circumvented or frustrated.

Further, an Order pursuant to CPR rule 6.16 that service and notification of the Amended Claim Form and Particulars of Claim be dispensed with.

4. Have you attached a draft of the order you are applying for? ☒ Yes ☐ No

5. How do you want to have this application dealt with? ☒ at a hearing ☐ without a hearing
- ☐ at a remote hearing

6. How long do you think the hearing will last? Is this time estimate agreed by all parties?

<input type="text"/>	Hours	<input type="text" value="20"/>	Minutes
<input type="checkbox"/> Yes		<input checked="" type="checkbox"/> No	

7. Give details of any fixed trial date or period

Review hearing listed for a three day window between 11 November and 13 November 2025
High Court Judge

8. What level of Judge does your hearing need?

The Defendants - Claimants to serve
N/A

9. Who should be served with this application?

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

10. What information will you be relying on, in support of your application?

☒ the attached witness statement

☐ the statement of case

☐ the evidence set out in the box below

If necessary, please continue on a separate sheet.

Please see paragraphs 43 to 52 of the seventh witness statement of John Michael Armstrong dated 24 October 2025.

11. Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

- ☐ Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.

- ☒ No

Statement of Truth

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

☐ I believe that the facts stated in section 10 (and any continuation sheets) are true.

☒ The applicant believes that the facts stated in section 10 (and any continuation sheets) are true. I am authorised by the applicant to sign this statement.

Signature

Signed by:

2AEF4626D58B472...

☐ Applicant

☐ Litigation friend (where applicant is a child or a Protected Party)

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

Date

Day

24

Month

10

Year

2025

Full name

Antony Douglas Phillips

Name of applicant's legal representative's firm

Fieldfisher LLP

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

Partner

Applicant's address to which documents should be sent.

Building and street

Riverbank House

Second line of address

2 Swan Lane

Town or city

London

County (optional)

Postcode

E C 4 R 3 T T

If applicable

Phone number

0300 460 7000

Fax phone number

DX number

Your Ref.

ADP/UK01-000162.00301

Email