

IN THE HIGH COURT OF JUSTICE

**BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES
CHANCERY DIVISION
PROPERTY TRUSTS AND PROBATE LIST**

B E T W E E N:

(1) UNITED KINGDOM OIL PIPELINES LIMITED

First Claimant / Applicant

(2) WEST LONDON PIPELINE AND STORAGE LIMITED

Second Claimant / Applicant

- and -

(1) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANTS AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN ON LAND AND BUILDINGS AT (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED RED ON THE ATTACHED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE (SHOWN FOR IDENTIFICATION SHADED RED ON THE ATTACHED SITE 2 PLAN)

First Defendant / Respondent

(2) PERSONS UNKNOWN WITHOUT THE CONSENT OF THE CLAIMANTS AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN INTERFERING WITH THE FIRST CLAIMANT'S RIGHTS TO PASS AND REPASS WITH OR WITHOUT VEHICLES, MATERIALS AND EQUIPMENT OVER PRIVATE ACCESS ROADS ADJACENT TO (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED BLUE ON THE ATTACHED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE (SHOWN FOR IDENTIFICATION SHADED BLUE ON THE ATTACHED SITE 2 PLAN)

Second Defendant / Respondent

BUNDLE 2 of 2 FOR HEARING ON 20 APRIL 2022

SECTIONS C - E

(1) UNITED KINGDOM OIL PIPELINES LIMITED

First Claimant / Applicant

(2) WEST LONDON PIPELINE AND STORAGE LIMITED

Second Claimant / Applicant

and

(1) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANTS AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN ON LAND AND BUILDINGS AT AND COMPRISING PART OF (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED RED ON THE ATTACHED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE (SHOWN FOR IDENTIFICATION SHADED RED ON THE ATTACHED SITE 2 PLAN)

First Defendant/Respondent

(2) PERSONS UNKNOWN WITHOUT THE CONSENT OF THE CLAIMANTS AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN INTERFERING WITH THE FIRST CLAIMANT'S RIGHTS TO PASS AND REPASS WITH OR WITHOUT VEHICLES, MATERIALS AND EQUIPMENT OVER PRIVATE ACCESS ROADS ADJACENT TO (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED BLUE ON THE ATTACHED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE (SHOWN FOR IDENTIFICATION SHADED BLUE ON THE ATTACHED SITE 2 PLAN)

Second Defendant/Respondent

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**SECTION C / Court Documents relating to Return
Date Hearing on 20 April 2022**

N244

Application notice

For help in completing this form please read the notes for guidance form N244Notes.

This 'return date' application will be heard on 20/4/22 pursuant to the Order dated 8/4/22.

Name of court High Court of Justice Business and Property Courts of England and Wales Chancery Division Property Trusts and Probate List		Claim no. PT-2022-000303							
Fee account no. (if applicable)		Help with Fees (if applicable)							
		Ref. no. PT-2022-000303							
Warrant no. (if applicable)		H W F - <table border="1"> <tr> <td></td><td></td><td></td><td></td><td></td><td></td> </tr> </table>							
Claimant's name (including ref.) (1) United Kingdom Oil Pipelines Limited (Company Number: 007466708) of 5-7 Alexandra Road, Hemel Hempstead, Hertfordshire, HP2 5BS; and (2) West London Pipeline and Storage Limited (Company Number: 01918796) of 5-7 Alexandra Road, Hemel Hempstead, Hertfordshire, HP2 5BS. REF: OTD/000162									
Defendant's name (including ref.) Persons Unknown									
Date		8 April 2022							



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 Claimant

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

An order to continue the interim injunction granted by Peter Knox QC on 8 April 2022 sitting as a Judge of the Chancery Division to restrain trespass on and nuisance affecting the Claimants' land and for alternative methods of service.

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 telephone hearing

6. How long do you think the hearing will

last? Is this time estimate agreed by all parties?

Hours

Minutes

☐Yes

☐No

7. Give details of any fixed trial date or period

Return date fixed for 20 April 2022

8. What level of Judge does your hearing need?

High Court Judge

9. Who should be served with this application?

Persons Unknown by alternative means

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

n/a

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

☐ the attached witness statements

☐ the statement of case (i.e. a
draft claim form)

☐ the evidence set out in the box below

If necessary, please continue on a separate sheet.

The Particulars of Claim.

The following witness statements:

1. Witness Statement of Peter Davis dated 7 April 2022
2. Witness Statement of John Armstrong dated 7 April 2022
3. Witness Statement of Daniel Owen Christopher Talfan Davies dated 8 April 2022


Statement of Truth

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.

☐ 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



☐ 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

08

Month

04

Year

2022

Full name

DANIEL OWEN CHRISTOPHER TALFAN DAVIES

Name of applicant's legal representative's firm

FIELD FISHER 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
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If applicable

Phone number

020 7861 4000

Fax number

020 7488 0084

DX number

Your Ref.

OTD/UK01.000162.00301

Email



Claim Form

In the High Court of Justice, Business and Property Courts of England and Wales, Chancery Division

Fee Account no.

Help with Fees -

Ref no. (if applicable)

H W F -

11 Apr 2022

For court use only

Claim no.

Issue date

PT-2022-000303

You may be able to issue your claim online which may save time and money. Go to www.moneyclaim.gov.uk to find out more.

Claimant(s) name(s) and address(es) including postcode

(1) **United Kingdom Oil Pipelines Limited** (Company Number: 007466708) of 5-7 Alexandra Road, Hemel Hempstead, Hertfordshire, HP2 5BS; and

(2) **West London Pipeline and Storage Limited** (Company Number: 01918796) of 5-7 Alexandra Road, Hemel Hempstead,

SEAL

Defendant(s) name and address(es) including postcode

Persons Unknown as further described in the attached rider

Brief details of claim

Claim for Injunctions as further described in the Particulars of Claim

Value

You must indicate your preferred County Court Hearing Centre for hearings here (*see notes for guidance*)

Defendant's name and address for service including postcode

£

Amount claimed

Court fee

Legal representative's costs

Total amount

For further details of the courts www.gov.uk/find-court-tribunal.

When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

Claim No.

Does, or will, your claim include any issues under the Human Rights Act 1998? ☒ Yes ☐ No

Particulars of Claim (~~attached~~) (to follow)


Statement of Truth

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.

☐ I **believe** that the facts stated in these particulars of claim are true.

☒ **The Claimant** believes that the facts stated these particulars of claim are true. I **am authorised** by the claimant to sign this statement.

Signature



☐ Claimant

☐ Litigation friend (where judgment creditor is a child or a patient)

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

Date

Day

Month

Year

7

APRIL

2022

Full name

DANIEL OWEN CHRISTOPHER TALFAN DAVIES

Name of claimant's legal representative's firm

FIELDFISHER LLP

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

PARTNER

Claimant's or claimant's legal representative'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
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If applicable

Phone number

03304607000

Fax phone number

DX number

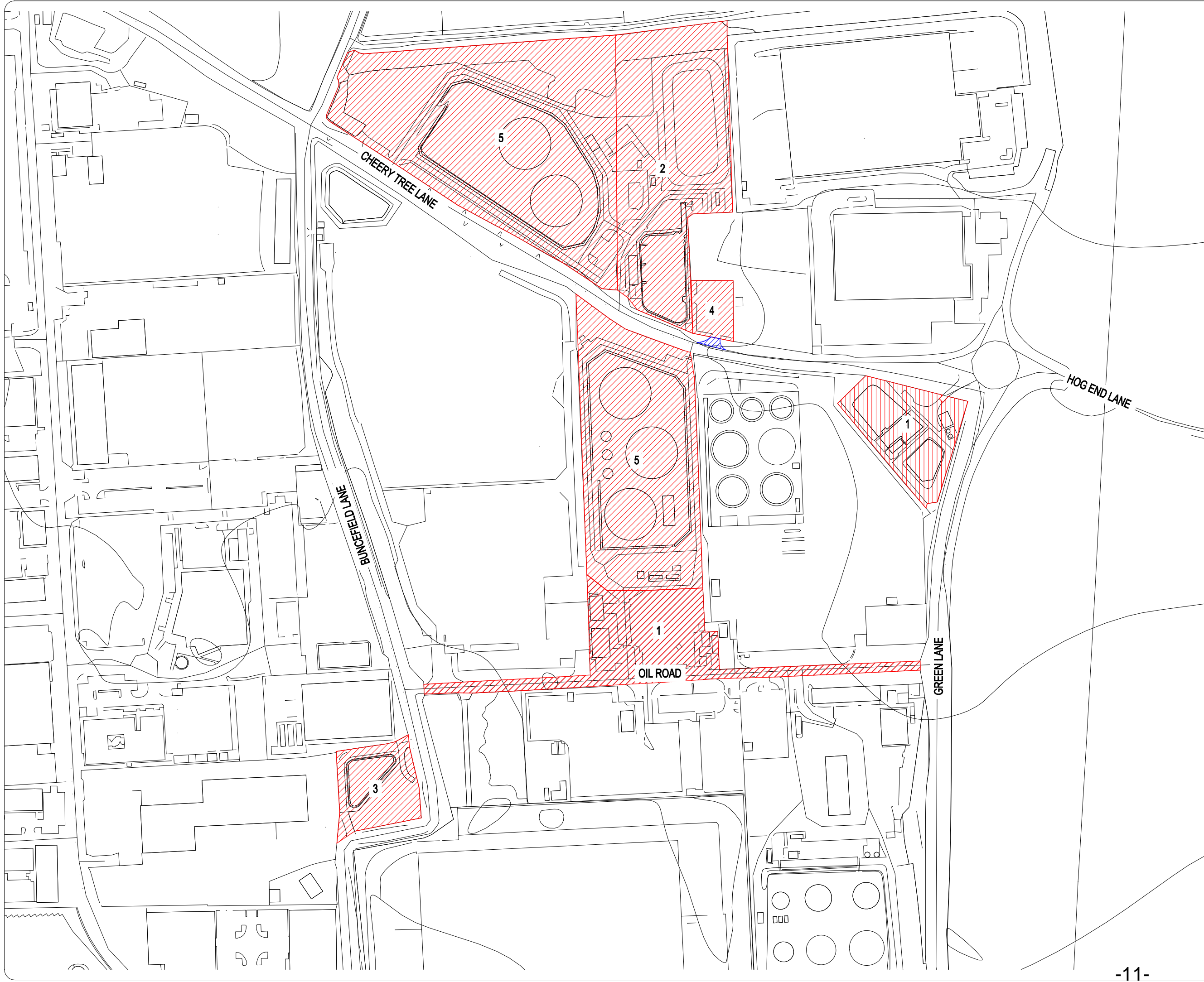
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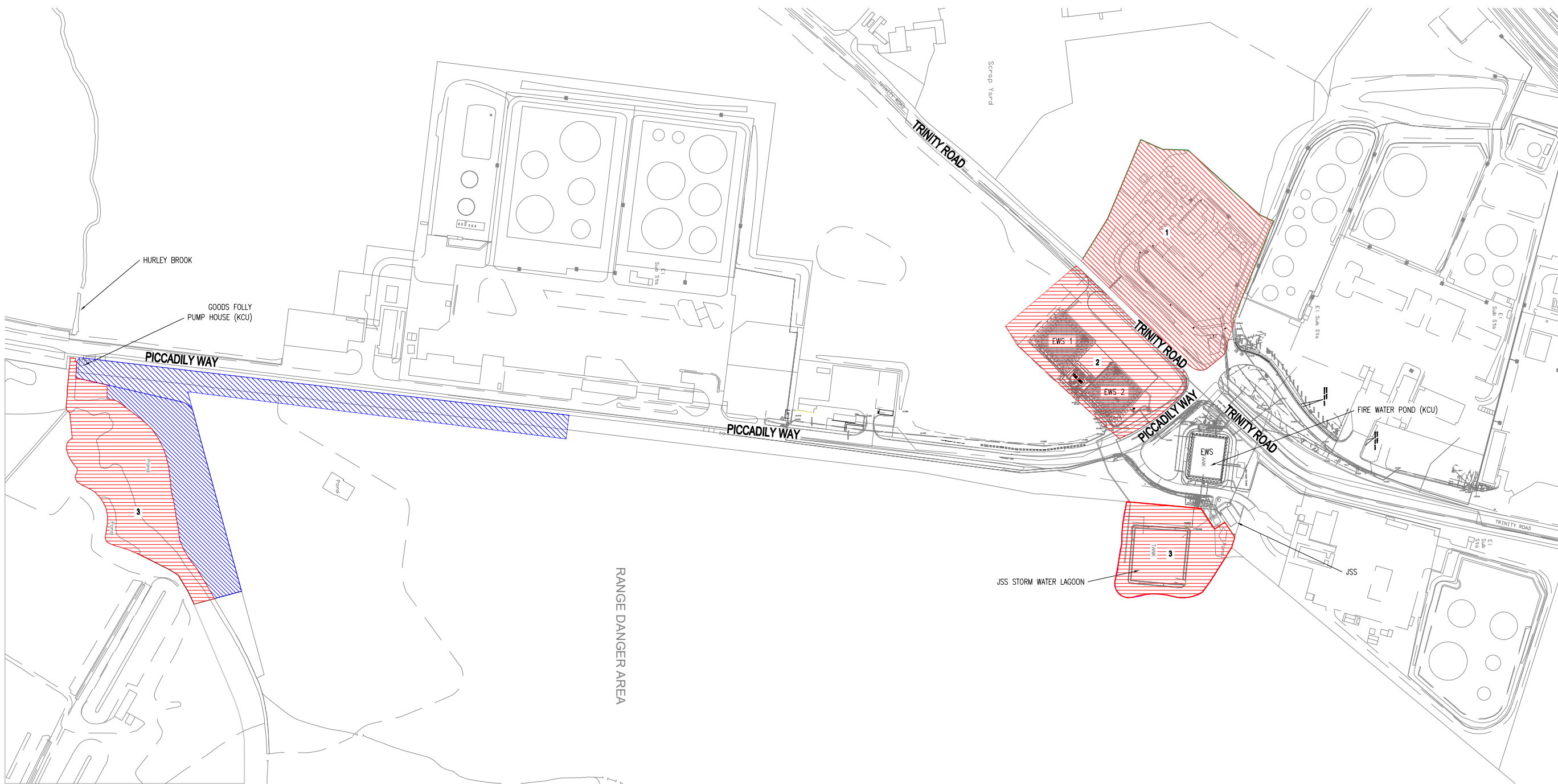
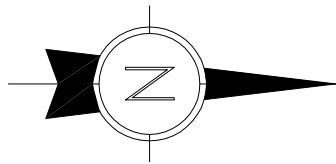
OTD/000162

Email

RIDER TO CLAIM FORM

- 1. PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT CONSENT AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN ON LAND AND BUILDINGS AT AND COMPRISING PART OF (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED RED ON THE ATTACHED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE (SHOWN FOR IDENTIFICATION SHADED RED ON THE ATTACHED SITE 2 PLAN)**
- 2. PERSONS UNKNOWN WITHOUT CONSENT AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN INTERFERING WITH THE FIRST CLAIMANT'S RIGHTS TO PASS AND REPASS WITH OR WITHOUT VEHICLES, MATERIALS AND EQUIPMENT OVER PRIVATE ACCESS ROADS ADJACENT TO (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED BLUE ON THE ATTACHED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE (SHOWN FOR IDENTIFICATION SHADED BLUE ON THE ATTACHED SITE 2 PLAN)**





IN THE HIGH COURT OF JUSTICE

Claim No. PT-2022-000303

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

CHANCERY DIVISION

PROPERTY TRUSTS AND PROBATE LIST

[...]

[...]

B E T W E E N

(1) UNITED KINGDOM OIL PIPELINES LIMITED

(2) WEST LONDON PIPELINE AND STORAGE LIMITED

Claimants / Applicants

and

(1) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT CONSENT, AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN, ON LAND AND BUILDINGS AT AND COMPRISING PART OF (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED RED ON THE ATTACHED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE (SHOWN FOR IDENTIFICATION SHADED RED ON THE ATTACHED SITE 2 PLAN)

First Defendants/Respondents

(2) PERSONS UNKNOWN WITHOUT CONSENT, AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN, OBSTRUCTING OR INTERFERING WITH THE FIRST CLAIMANT'S ACCESS OVER PRIVATE ACCESS ROADS ADJACENT TO (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED BLUE ON THE ATTACHED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE (SHOWN FOR IDENTIFICATION SHADED BLUE ON THE ATTACHED SITE 2 PLAN)

Second Defendants/Respondents

DRAFT ORDER AGAINST THE FIRST AND SECOND DEFENDANTS

(COLLECTIVELY "THE DEFENDANTS")

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible.

If you disobey this Order you may be found guilty of contempt of court and you may be sent to prison or your assets seized.

You have the right to apply to the court to vary or discharge this order (which is explained below).

RECITALS

UPON the hearing of the Claimants' Application dated 8 April 2022

UPON hearing Leading Counsel and Junior Counsel for the Claimants

AND UPON READING the evidence recorded on the Court file as having been read

AND UPON the Claimants giving and the Court accepting the undertaking listed in Schedule 3

AND UPON the Claimants acknowledging that they do not intend to prohibit any lawful protest outside any of the sites referred to in this Order and that this Order is not intended to prohibit such lawful protest

IT IS ORDERED THAT:

THE INJUNCTIONS

1. Until trial or further order:

(a) BUNCEFIELD (SITE 1)

2. The First Defendants and each of them are forbidden from (a) entering or remaining upon the land or buildings described in and defined as "**Buncefield (Site 1)**" in Schedule 2 to this Order and which are shown for illustration purposes shaded red on the plan annexed to Schedule 4 of the

Order ("**the Site 1 Plan**"), or (b) from causing damage to Buncefield (Site 1) or (c) removing equipment from Buncefield (Site 1), without the consent of the Claimants.

3. The Second Defendants and each of them are forbidden from obstructing or otherwise interfering with the First Claimant's access over the private access road on the land adjoining Buncefield Site 1 (the "**Site 1 Access Route**"), which is shown for illustration purposes shaded blue on the Site 1 Plan, for access and egress between Buncefield (Site 1) and the public highway.

(b) KINGSBURY (SITE 2)

4. The First Defendants and each of them are forbidden from (a) entering or remaining upon the land or buildings described in and defined as "**Kingsbury (Site 2)**" in Schedule 2 to this Order and which are shown for illustration purposes shaded red on the plan annexed to Schedule 5 of the Order (the "**Site 2 Plan**") or (b) from causing damage to Kingsbury (Site 2) or (c) removing equipment from Kingsbury (Site 2), without the consent of the First Claimant.
5. The Second Defendants and each of them are forbidden from obstructing or otherwise interfering with the First Claimant's access over the private access road on the land adjoining Site 2 (the "**Site 2 Access Route**"), which is shown for illustration purposes shaded blue on the Site 2 Plan, for access and egress between Kingsbury (Site 2) and the public highway.

VARIATION OF THIS ORDER

6. Anyone served or notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimants' solicitors 48 hours' notice of such application. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Claimants' solicitors at least 24 hours in advance of any hearing.
7. 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.
8. The Claimants have liberty to apply to extend or vary this Order or to seek further directions.

INTERPRETATION OF THIS ORDER

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

SERVICE OF THIS ORDER

10. Pursuant to CPR 6.15, 6.27 and 81.4(2)(c) and (d), service of this Order, shall be effected as follows:
 - (a) Fixing copies thereof in clear transparent sealed containers at a minimum number of 2 prominent locations on the perimeter of each of the Sites together with a notice which states that copies of the Order may be obtained from the Claimants' solicitors, Fieldfisher LLP, Riverbank House, 2 Swan Lane, London, EC4R 3TT (tel: 020 7861 4000) email:

UKOPinjunction@fieldfisher.com via, and may be viewed at, the web link referred to in paragraph 10(b) of this Order;

- (b) Posting the Order at the following web link: <https://ukop.azurewebsites.net>;
 - (c) Fixing warning notices (in substantially the same form as those set out in Schedule 6 and 7 to the Order dated 8 April 2022, but as amended to reflect the terms of this Order) as follows in not less than A2 size:
 - (i) In respect of **Buncefield (Site 1)** by affixing the form of site injunction notice (the "**Site 1 Notice**") in clearly visible locations (including at entranceways, access points, gates and attached to the perimeter fencing) around and comprising part of Site 1; and
 - (ii) In respect of **Kingsbury (Site 2)** by affixing the form of site injunction notice (the "**Site 2 Notice**") in clearly visible locations (including at entranceways, access points, gates and attached to the perimeter fencing) around and comprising part of Kingsbury (Site 2);
 - (d) Sending an email to each of the following email addresses with the information that copies of the Order may be viewed at the web link referred to in paragraph 10(b) above:
 - (i) xr-legal@riseup.net;
 - (ii) juststopoil@protonmail.co.uk
11. Pursuant to CPR 6.15(3), 6.27 and 81.4(2)(c) and (d), the Order will be deemed to be served on the latest date on which all of the methods of service referred to above have been completed, such date to be verified by the completion of a certificate of service.
12. Pursuant to CPR 6.15, 6.27 and 81.4(2)(c) and (d), the steps identified above shall stand as good service of the Order.

ALTERNATIVE SERVICE PROVISIONS FOR FUTURE APPLICATIONS BY THE CLAIMANTS IN THIS CLAIM

13. Pursuant to CPR 6.15, 6.27 and 81.4(2)(c) and (d), service of any future applications in this Claim by the Claimants and their evidence in support, shall be effected as follows:
- (a) Fixing copies thereof in clear transparent sealed containers at a minimum number of 2 prominent locations on the perimeter of each of the Sites together with a notice which states that copies of the documents may be obtained from the Claimants' solicitors, Fieldfisher LLP, Riverbank House, 2 Swan Lane, London, EC4R 3TT (tel: 020 7861 4000) email: UKOPinjunction@fieldfisher.com via, and may be viewed at, the web link referred to in paragraph 13(b) of this Order;
 - (b) Posting copies of these documents at the following web link: <https://ukop.azurewebsites.net>;
 - (c) Sending an email to each of the following email addresses with the information that copies of the documents may be viewed at the web link referred to in paragraph 13(b) above:
 - (i) xr-legal@riseup.net;

(ii) juststopoil@protonmail.co.uk

14. Pursuant to CPR 6.15(3), 6.27 and 81.4(2)(c) and (d), any documents served pursuant to the provision in paragraph 13 above will be deemed to be served on the latest date on which all of the methods of service referred to in paragraph 13 above have been completed in respect thereof, such date to be verified by the completion of a certificate of service.
15. Pursuant to CPR 6.15, 6.27 and 81.4(2)(c) and (d), the steps identified in paragraph 13 above shall stand as good service.

COSTS

16. Costs reserved.

COMMUNICATIONS WITH THE COURT

17. All communications about this Order should be sent to:

Court Manager
High Court of Justice
Chancery Division
Rolls Building
7 Rolls Building
Fetter Lane
London
EC4A 1NL

The telephone number is 020 7947 7501. The offices are open weekdays 10.00 a.m. to 4.30 p.m.

Out of hours telephone number is 020 7947 6260

18. Name and address of the Claimants' legal representatives

Fieldfisher LLP
Riverbank House
2 Swan Lane
London
EC4R 3TT

Telephone: 020 7861 4000

Fax: 020 7488 0084

Out of hours telephone number: 07711 088057

Reference: OTD/UK01.000162.00301

This Order shall be served by the Claimants on the Defendants. The Court has provided a sealed copy of this Order to the Claimants at:

Fieldfisher LLP
Riverbank House,
2 Swan Lane,
London

EC4R 3TT

Reference: OTD/000162

SCHEDULE 1

1. Witness Statement of Peter Davis dated 7 April 2022
2. Witness Statement of John Armstrong dated 7 April 2022
3. Witness Statement of Daniel Owen Christopher Talfan Davies dated 8 April 2022

SCHEDULE 2

THE SITES

Buncefield (Site 1))

1. The freehold land at:
 - (a) Land and buildings on the south side of Cherry Tree Lane, Hemel Hempstead which is registered at the Land Registry under title number HD485114 and marked 1 on the Site 1 Plan;
 - (b) Land to the north of Cherry Tree Lane, Hemel Hempstead which is registered at the Land Registry under title number HD485115 and marked 2 on the Site 1 Plan;
 - (c) Land on the west side of Buncefield Lane, Hemel Hempstead which is registered at the Land Registry under title number HD485116 and marked 3 on the Site 1 Plan;
 - (d) Land on the north east and south west side of Three Cherry Trees Lane, Hemel Hempstead registered at the Land Registry under title number HD485118 and marked 5 on the Site 1 Plan;
2. The leasehold land at:
 - (a) land on the north side of Cherry Tree Lane, Hemel Hempstead, as more particularly described by a lease dated 23 September 2013 made between (1) Total UK Limited and (2) United Oil Kingdom Pipelines Limited which is registered at the Land Registry under title number HD529733 and marked 4 on the Site 1 Plan.

Kingsbury (Site 2)

3. The freehold land at:
 - (a) All that piece of land at Kingsbury in the County of Warwick comprising 4.96 acres or thereabouts as more particularly described by a conveyance dated 31 March 1967 and made between (1) Shell-Mex and B.P. Limited and (2) United Oil Kingdom Pipelines Limited and marked 1 on the Site 2 Plan;
 - (b) Land on the south-east side of Trinity Road, Kingsbury, Tamworth which is registered at the Land Registry under title number WK468465 and marked 2 on the Site 2 Plan.
4. The leasehold land at:
 - (a) land at Kingsbury in the County of Warwick, as more particularly described in a lease dated 3 November 2021 made between (1) The Secretary of State for Defence and (2) United Oil Kingdom Pipelines Limited and marked 3 on the Site 2 Plan.

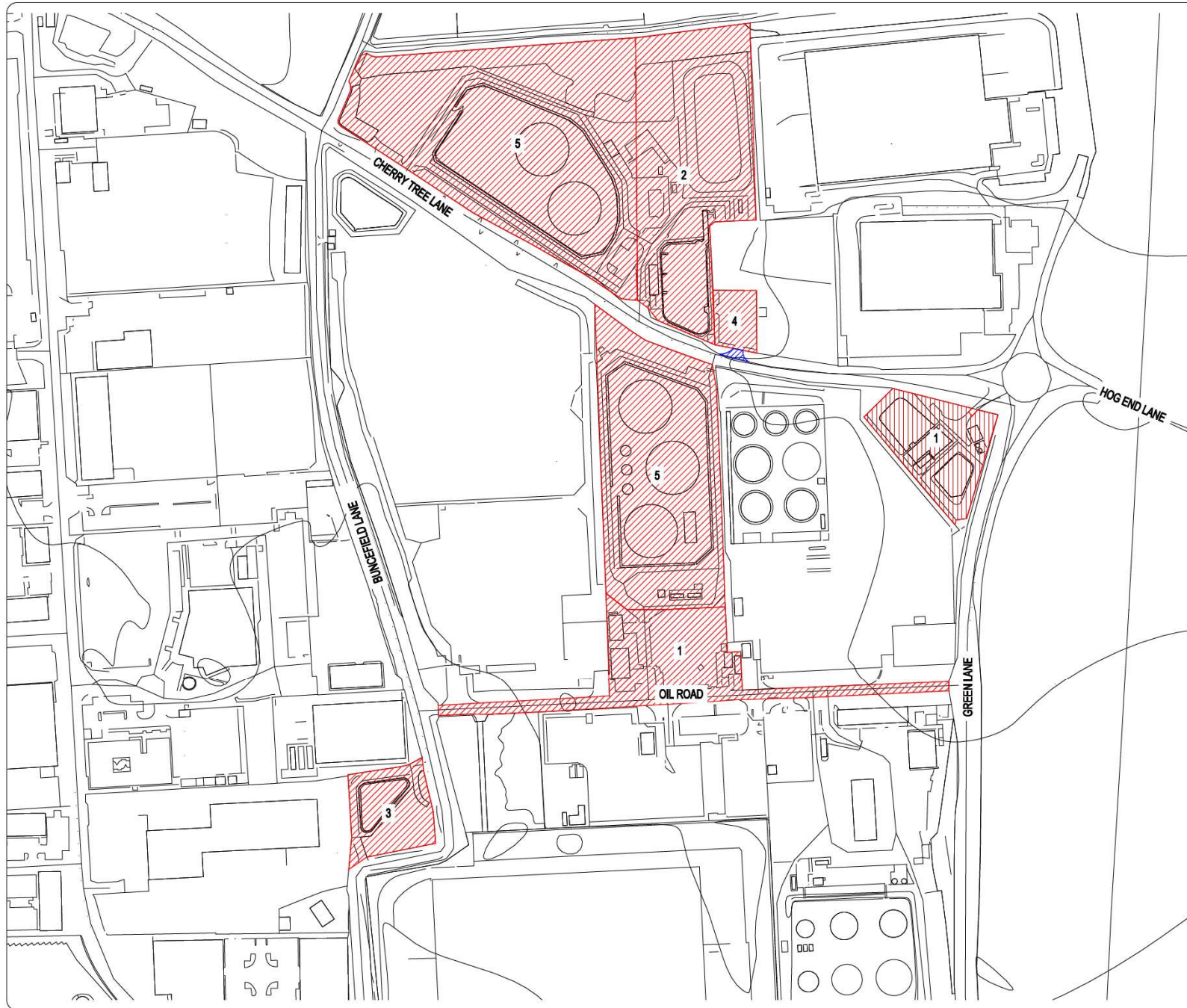
(together, the "**Sites**")

SCHEDULE 3

1. On the making of this Order, the Claimants undertake as follows: if the Court later finds that this Order has caused loss to the Defendants, and decides that the Defendants should be compensated for that loss, the Claimants will comply with any order the Court may make.

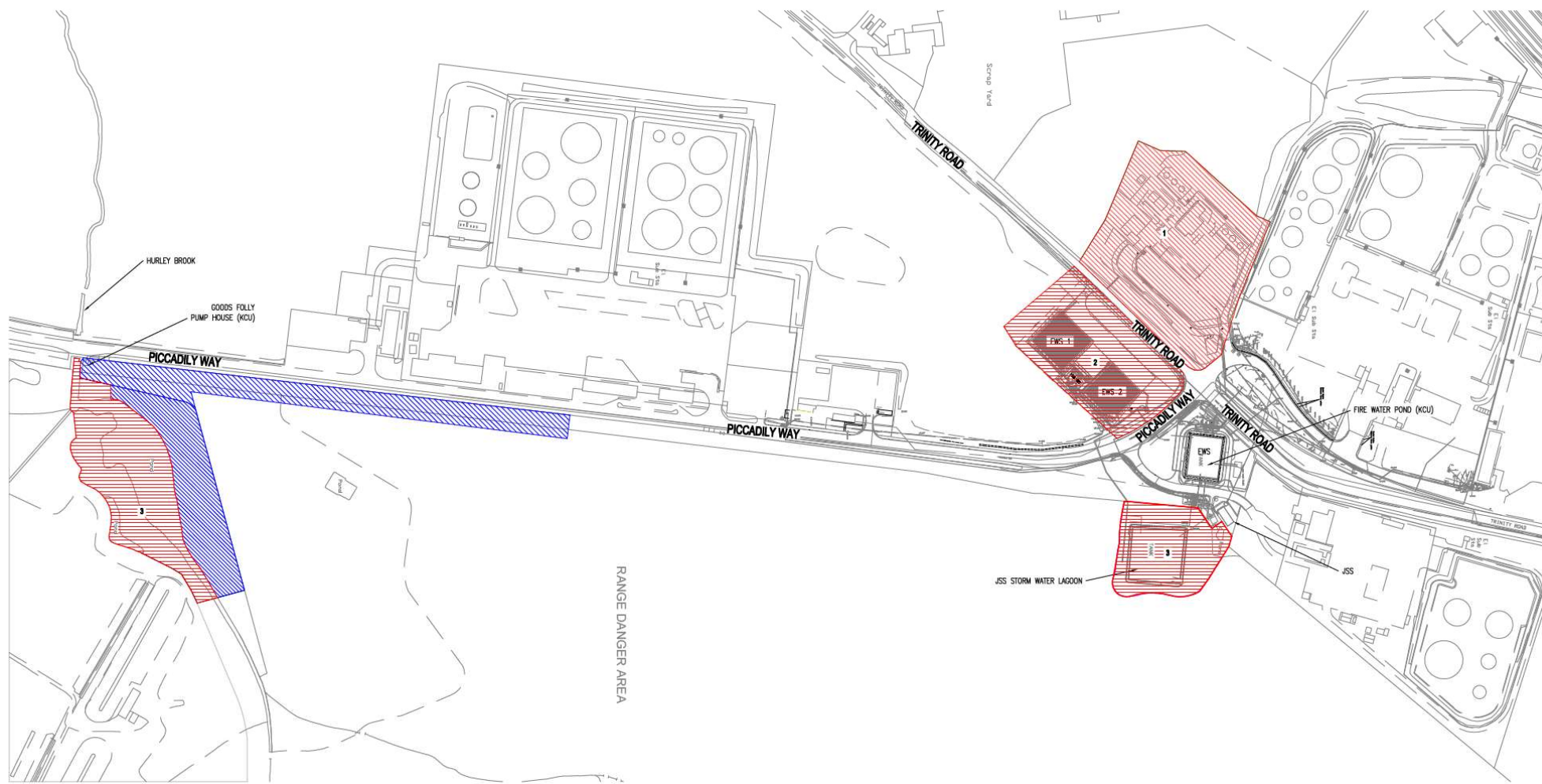
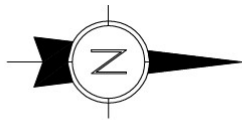
SCHEDULE 4

Plan of Buncefield (Site 1) ("**Site 1 Plan**")



SCHEDULE 5

Plan of Kingsbury (Site 2) ("**Site 2 Plan**")



Party: Claimant
Witness: Daniel Owen Christopher Talfan Davies
Exhibit: UKOP3
Dated: 8 April 2022

IN THE HIGH COURT OF JUSTICE
BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES
CHANCERY DIVISION
PROPERTY TRUSTS AND PROBATE LIST

Claim No. [...]

(1) UNITED KINGDOM OIL PIPELINES LIMITED

First Claimant / Applicant

(2) WEST LONDON PIPELINE AND STORAGE LIMITED

Second Claimant / Applicant

and

(1) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT CONSENT AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN ON LAND AND BUILDINGS AT AND COMPRISING PART OF (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED RED ON THE ATTACHED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE (SHOWN FOR IDENTIFICATION SHADED RED ON THE PLANS ANNEXED TO THE CLAIM FORM)

First Defendant/Respondent

(2) PERSONS UNKNOWN WITHOUT THE CONSENT OF THE CLAIMANTS AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN INTERFERING WITH THE FIRST CLAIMANT'S RIGHTS TO PASS AND REPASS WITH OR WITHOUT VEHICLES, MATERIALS AND EQUIPMENT OVER PRIVATE ACCESS ROADS ADJACENT TO (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED BLUE ON THE ATTACHED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE (SHOWN FOR IDENTIFICATION SHADED BLUE ON THE ATTACHED SITE 2 PLAN)

Second Defendant/Respondent

FIRST WITNESS STATEMENT OF

DANIEL OWEN CHRISTOPHER TALFAN DAVIES

I, Daniel Owen Christopher Talfan Davies, of Riverbank House, 2 Swan Lane, London EC4R 3TT will say as follows:

1. I am a Partner in Fieldfisher LLP and the solicitor with conduct of this matter on behalf of the Claimants. I am duly authorised to make this witness statement on behalf of the Claimants.
2. I make this statement from facts within my own knowledge, which I believe to be true. Where I refer to matters not within my knowledge, I confirm that they are true to the best of my knowledge, information and belief, and I state the source of the information.
3. Produced and shown to me is a bundle of documents marked "UKOP3". Page references in this witness statement are to page numbers are references to pages in this exhibit.
4. I make this witness statement in support of the Claimants' application for an order restraining the following activities by those carrying out direct action:
 - (a) unlawful trespass on the Claimants' private land; and
 - (b) unlawful interference with those rights of way the First Claimant enjoys over private land for the purposes of accessing and egressing from the Claimants' private land.

(the "**Application**")

NOTICE OF HEARING


5. I have read the first witness statement of John Michael Armstrong dated 7 April 2022 submitted in support of the Application. Paragraphs 63 – 75 of Mr Armstrong's statement relates to methods of service. With reference to those paragraphs, and in particular paragraph 63, where Mr Armstrong states:

"It is the intention of the Claimants through its solicitors Fieldfisher LLP to inform those connected with or affiliated to the Extinction Rebellion and Just Stop Oil campaign groups of the making of this Application. The Extinction Rebellion website includes the following email addresses: xr-legal@riseup.net for the purposes of legal communications with them. The Just Stop Oil website includes the following email address: juststopoil@protonmail.co.uk for communication with them generally."

6. With reference to the foregoing paragraph, I confirm that I emailed, at 6.27 a.m. and 6.28 a.m. respectively, the email addresses specified for the protest groups known as Extinction Rebellion and Just Stop Oil (see pages 2-3), confirming:
 - (a) the Claimants had issued the Application;
 - (b) the hearing was listed to take place today at 10.30 a.m., in Court 14 of The Rolls Building, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL before Peter Knox QC sitting as a Judge of the Chancery Division;
 - (c) the Claimants had not been able to identify the individuals who have trespassed on the Claimants' private land and/or interfered with the Claimants' rights of way over private land, or who intend to do so, at the properties which are the subject matter of these proceedings, and invited the recipients of the emails to identify such individuals or any individuals involved in direct action at those properties.
7. At 9.24 a.m. and 9.25 a.m., I sent a further email to the email addresses (see pages 4-7), to confirm that the hearing, which had been listed to commence at 10.30 a.m., was to commence at the later time of 11.30 a.m..

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

Signed:  Dated: 8 April 2022

Daniel Owen Christopher Talfan Davies

Party: Claimant
Witness: Daniel Owen Christopher Talfan Davies
Exhibit: UKOP4
Dated: 14 April 2022

**IN THE HIGH COURT OF JUSTICE
BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES
CHANCERY DIVISION
PROPERTY TRUSTS AND PROBATE LIST**

Claim No. PT-2022-000303

(1) UNITED KINGDOM OIL PIPELINES LIMITED

First Claimant / Applicant

(2) WEST LONDON PIPELINE AND STORAGE LIMITED

Second Claimant / Applicant

and

(1) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT CONSENT AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN ON LAND AND BUILDINGS AT AND COMPRISING PART OF (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED RED ON THE ATTACHED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE (SHOWN FOR IDENTIFICATION SHADED RED ON THE PLANS ANNEXED TO THE CLAIM FORM)

First Defendant/Respondent

(2) PERSONS UNKNOWN WITHOUT THE CONSENT OF THE CLAIMANTS AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN INTERFERING WITH THE FIRST CLAIMANT'S RIGHTS TO PASS AND REPASS WITH OR WITHOUT VEHICLES, MATERIALS AND EQUIPMENT OVER PRIVATE ACCESS ROADS ADJACENT TO (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED BLUE ON THE ATTACHED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE (SHOWN FOR IDENTIFICATION SHADED BLUE ON THE ATTACHED SITE 2 PLAN)

Second Defendant/Respondent

SECOND WITNESS STATEMENT OF

DANIEL OWEN CHRISTOPHER TALFAN DAVIES

I, Daniel Owen Christopher Talfan Davies, of Riverbank House, 2 Swan Lane, London EC4R 3TT will say as follows:

1. I am a Partner in Fieldfisher LLP ("**Fieldfisher**") and the solicitor with conduct of this matter on behalf of the Claimants. I am duly authorised to make this witness statement on behalf of the Claimants.
2. I make this statement from facts within my own knowledge, which I believe to be true. Where I refer to matters not within my knowledge, I confirm that they are true to the best of my knowledge, information and belief, and I state the source of the information.
3. Produced and shown to me are a bundle of documents marked "**UKOP4**". Unless otherwise stated, page references in this witness statement refer to pages in that exhibit.
4. For ease, in this statement I have adopted the definitions set out in the order of Mr Peter Knox QC (acting as a Deputy Judge in the Chancery Division) dated 8 April 2022 in these proceedings (the "**Order**").

SERVICE OF PROCEEDINGS

5. I make this witness statement in order to evidence the Claimants' compliance with paragraph 13 of the Order relating to service of the Court Documents, the Notices and the Order on the Defendants. In this witness statement, I summarise the methods of service effected on behalf of the Claimants.

Compliance with paragraph 13(a) of the Order – Site 1

6. On the instructions of the Claimants' solicitors, between 3.05pm and 3.20pm on 12 April 2022, the Claimants' appointed agents effected service of the Court Documents (excluding the sealed Order and any further evidence to be relied upon on the Return Date) together with a notice which stated that copies of the Order and the Court Documents may be obtained from the Claimants' solicitors, Fieldfisher LLP, Riverbank House, 2 Swan Lane, London, EC4R 3TT (tel: 020 7861 4000) email: UKOPinjunction@fieldfisher.com via, and may be viewed at <https://ukop.azurewebsites.net>, by placing copies of the Court Documents in, and affixing the said notice to, clear transparent sealed containers at two prominent locations on the perimeter of Site 1, as more particularly set out in the second witness statement of Richard Thomas dated 13 April 2022 (**Tab19:UKOP4:8-25**).
7. On the instructions of Peter Davis being a Consultant for British Pipeline Agency Limited, the agent of the First Claimant, the appointed agent, Barry Smith, thereafter effected service of the sealed Order by placing copies of the sealed Order in the clear transparent sealed containers referred to at paragraph 6 above:
 - (a) at 6.56am on 13 April 2022, in the sealed container situated at a prominent location on the perimeter of Site 1, known as the East entrance of Oil Road (images of the container appear at (**Tab19:UKOP4:26-28**); and
 - (b) at 7.12am on 13 April 2022, in the sealed contained situated at another prominent location on the perimeter of Site 1, known as the main entrance to Cherry Tree Farm (images of the container appear at (**Tab19:UKOP4:29-31**).

Compliance with paragraph 13(a) of the Order – Site 2

8. On the instructions of the Claimants' solicitors, between 11.20am and 11.30 am on 12 April 2022 the Claimants' appointed agents effected service of the Court Documents (excluding the sealed Order and any further evidence to be relied upon on the Return Date), together with a notice which stated that copies of the Order and the Court Documents may be obtained from the Claimants'

solicitors, Fieldfisher LLP, Riverbank House, 2 Swan Lane, London, EC4R 3TT (tel: 020 7861 4000) email: UKOPinjunction@fieldfisher.com via, and may be viewed at <https://ukop.azurewebsites.net> by placing copies of the Court Documents in, and affixing the said notice to, clear transparent sealed containers at two prominent locations on the perimeter of Site 2, as more particularly set out in the first witness statement of Richard Thomas dated 13 April 2022 (**Tab19:UKOP4:32-48**).

9. On the instructions of Peter Davis being a Consultant for British Pipeline Agency Limited, the agent of the First Claimant, the appointed agent, Paul Girling, effected service of the sealed Order by placing copies of the sealed Order in each of the clear transparent sealed containers referred to at paragraph 8 above at approximately 9.00am on 13 April 2022 (images of the containers appear at (**Tab19:UKOP4:49**)).

Compliance with paragraph 13(b) of the Order

10. Between 8.28pm and 8.45pm on 8 April 2022, on my instructions, Andrew Fletcher of Fieldfisher, the Claimants' solicitors, uploaded the following documents to <https://ukop.azurewebsites.net>, being the web link stated in the Order:
 - (a) the Court Bundle used at the hearing of the Application on 8 April 2022 (the "**Hearing**");
 - (b) the Application Notice for the Hearing dated 7 April 2022;
 - (c) the draft Order for the Return Date;
 - (d) the Defendant's Response Pack; and
 - (e) the First Witness Statement of Daniel Owen Christopher Talfan Davies dated 8 April 2022 together with Exhibit UKOP3.
11. At 4.10pm on 11 April 2022, on my instructions, Andrew Fletcher of Fieldfisher, uploaded the sealed Application Notice for the Return Date and the Sealed Claim Form to <https://ukop.azurewebsites.net>, being the web link stated in the Order.
12. At 11.38am on 12 April 2022, on my instructions, Andrew Fletcher uploaded the sealed Order to <https://ukop.azurewebsites.net>, being the web link stated in the Order.
13. A screenshot of the web link page hosting the Order and the Court Documents (excluding any further evidence to be relied upon on the Return Date) appears at (**Tab19:UKOP4:50**).

Compliance with paragraph 13(c) of the Order

14. On the instructions of the Claimants' solicitors, between 3.25pm and 4.35pm on 12 April 2022, the Claimants' appointed agents effected service of the Notices by affixing the Site 1 Notice in not less than A2 size in clearly visible locations (including at entranceways, access points, gates and attached to the perimeter fencing) around and comprising part of Site 1, as more particularly set out in the second witness statement of Richard Thomas dated 13 April 2022 (**Tab19:UKOP4:8-25**); and
15. On the instructions of the Claimants' solicitors, between 11.35am and 12.50pm on 12 April 2022 the Claimants' appointed agents effected service of the Notices by affixing the Site 2 Notice in not less than A2 size in clearly visible locations (including at entranceways, access points, gates and

attached to the perimeter fencing) around and comprising part of Site 2, as more particularly set out in the first witness statement of Richard Thomas dated 13 April 2022 (**Tab19:UKOP4:32-48**).

Compliance with paragraph 13(d) of the Order

16. At 10.54am on 13 April 2022, I sent an email to xr-legal@riseup.net and, at 10.58am on 13 April 2022, I sent an email to juststopoil@protonmail.co.uk, confirming that copies of the Order and the Court Documents (excluding any further evidence to be relied upon on the Return Date) may be viewed at <https://ukop.azurewebsites.net>, being the web link stated in the Order.
17. As referred to in my first witness statement dated 8 April 2022, on 8 April 2022 at 6.28am, I emailed Just Stop Oil at juststopoil@protonmail.co.uk, confirming that:
 - (a) the Claimants had issued the Application;
 - (b) the hearing was listed to take place at 10.30 a.m., in Court 14 of The Rolls Building, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL before Peter Knox QC sitting as a Judge of the Chancery Division; and
 - (c) the Claimants had not been able to identify the individuals who had trespassed on the Claimants' private land and/or interfered with the Claimants' rights of way over private land, or who intended to do so, at the properties which were the subject matter of these proceedings and inviting the recipients of the email to identify such individuals or any individuals involved in direct action at those properties.
18. A further email was sent at 9.25am to the same email address confirming that the hearing, which had been listed to commence at 10.30am, was to commence at the later time of 11.30am.
19. However, on 12 April 2022, I received an email timed 6.36am confirming that the emails that I had sent to juststopoil@protonmail.co.uk "could not be delivered due to: Recipient server unavailable or busy" (**Tab19:UKOP4:53**). Having reviewed the website for Just Stop Oil, I believe that the email address juststopoil@protonmail.co.uk had been inserted in the Order with reference to an earlier Court Order in different proceedings, where the email address was given as the email address for the Just Stop Oil protest group, and in which proceedings the Claimants' Counsel had acted, whereas the email addresses currently published on Just Stop Oil's webpage are set out at paragraph 20(a) and (b) below.
20. In light of the matters set out at paragraph 19 above, my email of 10.58am to juststopoil@protonmail.co.uk was also sent to the following email addresses:
 - (a) juststopoil@protonmail.com (being the email address specified on Just Stop Oil's privacy policy page); and
 - (b) juststopoilpress@protonmail.com (being the address specified on Just Stop Oil's press page).
21. In my emails of 10.54am and 10.58am, I also confirmed the following:
 - (a) that a solicitor's note of the hearing may be viewed at <https://ukop.azurewebsites.net>, being the web link stated in the Order;
 - (b) that the Order would be considered further at the Return Date, which has been fixed for 20 April 2022 with a time estimate of 3 hours. The matter has been reserved to Mr Peter

Knox QC sitting as a Deputy Judge (without prejudice to any application by any Defendant that another judge hear the matter) and that details of the start time for the Return Date and the Court Room in which the Return Date will be heard would be provided once known to the Claimants;

- (c) that the Order grants permission for the Claimants to file and serve any further evidence by 4.30pm on Thursday, 14 April 2022 and that it is the intention of the Claimants to file and serve further evidence. Accordingly, copies of that further evidence will be made available at the weblink <https://ukop.azurewebsites.net> on Thursday, 14 April 2022;
- (d) that the Order grants permission for any individual who wishes to come forward to defend the proceedings to file and serve any evidence by 4.30pm on Tuesday, 19 April 2022 and that Fieldfisher is authorised to accept service for and on behalf of the Claimants and confirming that service of any evidence can be affected by emailing the relevant documents to the following email address: UKOPinjunction@fieldfisher.com; and
- (e) that the Claimants will prepare a bundle for use at the Return Date which contains the Court Documents together with the further evidence relied upon by the Claimants and the bundle will be made available at <https://ukop.azurewebsites.net> on Thursday, 14 April 2022.

22. Copies of the relevant emails appear at **Tab19:UKOP4:51-53**.

23. I confirm that it is the Claimants' intention to serve the further evidence which is to be relied upon on the Return Date on 14 April 2022 in compliance with the Order by the methods for service specified at paragraph 13 of the Order and that a Certificate of Service confirming service in respect of the same will be filed at the Court following service on 14 April 2022.

Other Documents

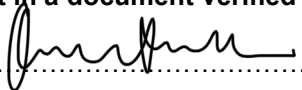
24. In addition to the Court Documents, the Claimants have made available the Claimants' solicitors' note of the Hearing and judgment in the Application (the "**Note of Hearing**") as follows:

- (a) on the instructions of Peter Davis being a Consultant for British Pipeline Agency Limited, the agent of the First Claimant, the appointed agent, Barry Smith, placed a copy of the Note of Hearing in each of the clear transparent sealed containers referred to at paragraph 6 above:
 - (i) at 11.58am on 13 April 2022, in the clear transparent container situated at the East entrance of Oil Road (images of the container appear at **(Tab19:UKOP4:54-55)**); and
 - (ii) at 12.30pm on 13 April 2022, in the clear transparent container situated at the main entrance to Cherry Tree Farm (images of the container appear at **(Tab19:UKOP4:56-57)**).
- (b) on the instructions of Peter Davis being a Consultant for British Pipeline Agency Limited, the agent of the First Claimant, the appointed agent, Gavin Grice, placed a copy of the Note of Hearing in each of the clear transparent sealed containers referred to at paragraph 8 above at 1.00pm on 13 April 2022 (images of the containers appear at **(Tab19:UKOP4:58)**);

- (c) at 10.01am on 13 April 2022, on my instructions, Andrew Fletcher uploaded the Note of Hearing to <https://ukop.azurewebsites.net>, being the web link stated in the Order. A screenshot of the web link page appears at (Tab19:UKOP4:50); and
- (d) as referred to in paragraph 16 above, at 10.54am on 13 April 2022, I sent an email to xr-legal@riseup.net and, at 10.58am on 13 April 2022, I sent an email to juststopoil@protonmail.co.uk, juststopoil@protonmail.com and juststopoilpress@protonmail.com confirming that a copy of the Note of Hearing may be viewed at <https://ukop.azurewebsites.net>, being the web link stated in the 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

Signed:  Dated: 14 April 2022

Daniel Owen Christopher Talfan Davies

Certificate of service

On what day did you serve?	1	3	/	0	4	/	2	0	2	2
The date of service is	1	3	/	0	4	/	2	0	2	2

Name of court HIGH COURT OF JUSTICE, BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES, CHANCERY DIVISION PROPERTY TRUST AND PROBATE LIST	Claim No. PT-2022-000303
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Name of Claimant (1) UNITED KINGDOM OIL PIPELINES LIMITED (2) WEST LONDON PIPELINE AND STORAGE LIMITED

Name of Defendant (1) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT CONSENT, AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN, ON LAND AND BUILDINGS AT AND COMPRISING PART OF (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED RED ON THE SITE 1 PLAN ATTACHED TO THE CLAIM FORM) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE (SHOWN FOR IDENTIFICATION SHADED RED ON THE SITE 2 PLAN ATTACHED TO THE CLAIM FORM) (2) PERSONS UNKNOWN WITHOUT CONSENT, AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN, OBSTRUCTING OR INTERFERING WITH THE FIRST CLAIMANT'S ACCESS OVER PRIVATE ACCESS ROADS ADJACENT TO (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED BLUE ON THE SITE 1 PLAN ATTACHED TO THE CLAIM FORM) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE (SHOWN FOR IDENTIFICATION SHADED BLUE ON THE SITE 2 PLAN ATTACHED TO THE CLAIM FORM)
--

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

- (a) Order of Mr Peter Knox QC dated 8 April 2022 (the "Order")
(b) The Court Documents as described in paragraph 13 of the Order (excluding any further evidence to be relied upon on the Return Date)
(c) The Claimants' Solicitors' note of the Hearing and judgment in the Application

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

The First and Second Defendants pursuant to paragraph 13 of the Order

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)

1. Service was effected at the Sites (as more particularly described in Schedule 2 of the Order) by the First Claimant and/or its appointed agents:

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

Service was effected: (a) at the Sites, as more particularly described in Schedule 2 of the Order, and as shown shaded red on the plan annexed to Schedule 4 and Schedule 5 of the Order; (b) on the web link specified in paragraph 13(b) of the Order (https://ukop.azurewebsites.net); (c) at the email addresses specified in paragraph 13(d) of the Order (xr-legal@riseup.net and juststopoil@protonmail.co.uk); and (d) at the additional email addresses listed below: juststopoil@protonmail.com ; and juststopoilpress@protonmail.com
--

(a) in respect of Site 1 :

(i) between 3.05pm and 3.20pm on 12 April 2022, by affixing the Court Documents (excluding the sealed Order and any further evidence to be relied upon on the Return Date) in clear transparent sealed containers at a minimum number of 2 prominent locations on the perimeter of Site 1 together with a notice stating that the copies of the Order and Court Documents may be obtained from the Claimants' solicitors (at the details set out in paragraph 13(a) of the Order) and may be viewed at <https://ukop.azurewebsites.net>). Photographs of the Court Documents (excluding the sealed Order and any further evidence to be relied upon on the Return Date) and notices so affixed is at **Tab19:UKOP4:12** ; and

(ii) at 6.56am and 7.12am on 13 April 2022, by affixing the sealed Order in the same clear transparent sealed containers, as referred to at (a)(i) above, at a minimum number of 2 prominent locations on the perimeter of Site 1. A series of photographs of the sealed Order so affixed is at **Tab19:UKOP4:26-31**; and

(iii) between 3.25pm and 4.35pm on 12 April 2022, by affixing the form of warning notice set out in Schedule 6 of the Order (in no smaller than A2 in size) in clearly visible locations (including at entranceways, access points, gates and attached to the perimeter fencing) around and comprising part of Site 1. A series of photographs of the notices so affixed is at **Tab19:UKOP4:18-22**.

(b) in respect of Site 2:

(i) between 11.20am and 11.30am on 12 April 2022, by affixing the Court Documents (excluding the sealed Order and any further evidence to be relied upon on the Return Date) in clear transparent sealed containers at a minimum number of 2 prominent locations on the perimeter of Site 2 together with a notice stating that the copies of the Order and Court Documents may be obtained from the Claimants solicitors (at the details set out in paragraph 13(a) of the Order) and may be viewed at <https://ukop.azurewebsites.net>. Photographs of the Court Documents and notices so affixed is at **Tab19:UKOP4:36**; and

(ii) at 9.00am on 13 April 2022, by affixing the sealed Order in the same clear transparent sealed containers, as referred to at (b)(i) above, at a minimum number of 2 prominent locations on the perimeter of Site 2. Photographs of the Order so affixed is at **Tab19:UKOP4:49**; and

(iii) between 11.35am and 12.50pm on 12 April 2022, by affixing the form of warning notice set out in Schedule 7 of the Order (in no smaller than A2 in size) in clearly visible locations (including at entranceways, access points, gates and attached to the perimeter fencing) around and comprising part of Site 2. A series of photographs of the notices so affixed is at **Tab19:UKOP4:42-45** .

As evidenced, in respect of each Site, by the second witness statement of Daniel Owen Christopher Talfan Davies dated 14 April 2022.

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*)

2. Service was further effected on 11 April 2022, in accordance with paragraph 13(b) of the Order, by uploading the Court Documents (excluding the sealed Order and any further evidence to be relied upon on the Return Date) to <https://ukop.azurewebsites.net> and on 12 April 2022 by uploading the sealed Order to <https://ukop.azurewebsites.net>. A copy of the web link page appears at Tab19:UKOP4:50.

As evidenced by the second witness statement of Daniel Owen Christopher Talfan Davies dated 14 April 2022.

3. Service was further effected on 13 April 2022, in accordance with paragraph 13(d) of the Order, by email at 10.54am to xr-legal@riseup.net and at 10.58am to juststopoil@protonmail.co.uk, juststopoil@protonmail.com and juststopoilpress@protonmail.com stating that copies of the Order and Court Documents may be viewed at <https://ukop.azurewebsites.net>. Copies of the emails appear at Tab19:UKOP4:51-52.

As evidenced by the second witness statement of Daniel Owen Christopher Talfan Davies dated 14 April 2022.

4. Service of the Claimants' Solicitors' note of the Hearing and judgment in the Application was served:

(a) at 11.58am and 12.30pm on 13 April 2022 in the same clear transparent sealed containers, as referred to at 1(a)(i) above, at a minimum number of 2 prominent locations on the perimeter of Site 1 (images of the container appear at (Tab19:UKOP4:54-55)

(b) at 1pm on 13 April 2022 in the same clear transparent sealed containers, as referred to at 1(b)(i) above (images of the containers appear at (Tab19:UKOP4:58)

(c) at 10.01am on 13 April 2022 by uploading them to <https://ukop.azurewebsites.net>. A screenshot of the web link page appears at (Tab19:UKOP4:50)

(d) by email at 10.54am to xr-legal@riseup.net and at 10.58am to juststopoil@protonmail.co.uk, juststopoil@protonmail.com and juststopoilpress@protonmail.com confirming that a copy of the Note of Hearing may be viewed at <https://ukop.azurewebsites.net>. Copies of the emails appear at Tab19:UKOP4:51-52.

[] 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*)


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

DANIEL OWEN CHRISTOPHER TALFAN DAVIES

Signed



(Claimant) (Defendant) ('s solicitor) ('s litigation friend)

Position
or office
held

Partner

(If signing on behalf of firm or
company)

Date

1	4	0	4	2	0	2	2
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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.

Party: Claimant
Witness: John Michael Armstrong
Number: Second
Exhibit: UKOP5
Dated: 14 April 2022

IN THE HIGH COURT OF JUSTICE

Claim No. PT-2022-000303

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

CHANCERY DIVISION

B E T W E E N

(1) UNITED KINGDOM OIL PIPELINES LIMITED

(2) WEST LONDON PIPELINE AND STORAGE LIMITED

Claimants / Applicants

and

(1) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT CONSENT, AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN, ON LAND AND BUILDINGS AT AND COMPRISING PART OF (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED RED ON THE ATTACHED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE (SHOWN FOR IDENTIFICATION SHADED RED ON THE ATTACHED SITE 2 PLAN)

First Defendant / Applicant

(2) PERSONS UNKNOWN WITHOUT CONSENT, AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN, OBSTRUCTING OR INTERFERING WITH THE FIRST CLAIMANT'S ACCESS OVER PRIVATE ACCESS ROADS ADJACENT TO (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED BLUE ON THE ATTACHED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE (SHOWN FOR IDENTIFICATION SHADED BLUE ON THE ATTACHED SITE 2 PLAN)

Second Defendant / Applicant

SECOND WITNESS STATEMENT OF

JOHN MICHAEL ARMSTRONG

I, John Michael Armstrong, of 5-7 Alexandra Road, Hemel Hempstead, Hertfordshire will say as follows:

1. I currently act as the Director and General Manager of British Pipeline Agency Limited ("**BPA**") and have held this role since 1 September 2021. I have worked for BPA since July 2020 and prior to becoming a Director and General Manager, I was the Chief Operating Officer of BPA. Prior to that, I enjoyed senior roles across distributed energy, power generation and engineering safety.
2. BPA is the UK's leading provider of engineering and operational services to the oil and gas pipeline sector. It has operated UK onshore pipelines and terminal facilities for over 50 years, currently managing over 1000km of fuel pipes in the UK.
3. I am duly authorised to make this witness statement on behalf of the Claimants.
4. I make this statement from facts within my own knowledge, which I believe to be true. Where I refer to matters not within my knowledge, I confirm that they are true to the best of my knowledge, information and belief, and I state the source of the information.
5. Produced and shown to me is a bundle of documents containing exhibit "**UKOP5**". Unless otherwise stated, page references in this witness statement refer to pages in that exhibit.
6. In this statement I adopt the definitions set out in my first witness statement dated 7 April 2022.

THE RETURN DATE

7. I make this witness statement in support of the Claimants' application for an order for pre-emptive injunctive relief in the terms set out in the draft Order.
8. The purpose of this second witness statement, which supplements my first witness statement dated 7 April 2022, is to provide to the Court an update in respect of events following the grant of an interim order for pre-emptive injunctive relief in these proceedings made by Mr Peter Knox QC acting as a Deputy Judge in the Chancery Division following a hearing on 8 April 2022 (the "**Order**") and therefore addresses:
 - (a) evidence of direct action targeted at the Claimants (in the vicinity of Site 1 and Site 2) since the making of the Order;
 - (b) evidence of direct action targeted at other operators which has occurred since the date of the Order; and
 - (c) evidence of direct action by members of Extinction Rebellion as part of a campaign of "*civil disobedience*" across the UK which has occurred since the date of the Order.

DIRECT ACTION AT SITES 1 AND 2

9. In my first witness statement dated 7 April 2022 I addressed in detail the direct action suffered by the Claimants in respect of Site 1, which direct action formed the basis for the Claimants seeking an interim order for pre-emptive injunctive relief in the form set out at paragraphs 1-5 of the Order.
10. Since the date of the Order, there have been further incidents of direct action targeted at the operations of the Claimant (and other neighbouring operators) in close proximity to Site 1 and Site 2. However, whilst the level of direct action at and around Sites 1 and 2 was significant between 1 April 2022 and 7 April 2022, the Claimants have noted that such direct action has reduced in the week commencing 11 April 2022, which the Claimants attribute to:

- (a) the service of the Order at the Sites and by email to the campaign groups Extinction Rebellion and Just Stop Oil; and
 - (b) the stationing of a police presence at the top of Oil Road numbered 1 and shaded red on the Site 1 Plan and outside the entrance of the control centre numbered 1 and shaded red on the Site 2 Plan.
11. To that end, I set out below examples of direct action since the Order was made, which are set out by reference to each of the Sites and which evidence has been obtained from three principal sources, namely:
- (a) daily reports from BPA security personnel working at the Sites which has been relayed to me;
 - (b) various social media postings made or produced by, or on behalf of the campaign groups Extinction Rebellion and Just Stop Oil; and
 - (c) various newspaper articles which have appeared in the national press.

DIRECT ACTION FROM DATE OF ORDER TO 13 APRIL 2022

Site 1 (Buncefield)

12. On 10 April 2022 it was reported by the local news that 40 members of Just Stop Oil blocked the entrance to the Buncefield Oil Terminal, of which Site 1 comprises part. Site 1 also includes private land up to the entranceway to Site 1 (which entranceway abuts the public highway). The blockading of the entranceway resulted in 13 arrests being made by police (**Tab20:UKOP5:61-65**). I have been informed by BPA Security personnel working at Site 1 that the blockage began at 2.17am, preventing movement of vehicles through the entrance, which was closed by locked gates just as the individuals arrived. The individuals were cleared from the entranceway by 11.11am the same day, almost 10 hours after the entrance was initially blocked, and so to allow vehicular movement to proceed again.
13. A post on Just Stop Oil's twitter page on the same date (10 April 2022) quotes one of the members of the group who was on site as stating: "*I won't be stopped, and I won't back down until our government stops trading our lives for profit*" (**Tab20:UKOP5:66**).

Site 2 (Kingsbury)

14. On 8 April 2022, being the date on which the Order was made, it was reported that 37 protestors had broken into the Kingsbury Oil Terminal (of which Site 2 comprises part) and chained themselves to pipes, bringing distribution to a halt. The protestors scaled a spiked fence and used a hacksaw to break through an unguarded rear gate into the Terminal, just after midnight (**Tab20:UKOP5:122-125**). The site of the trespass is approximately 0.2 miles from the land numbered 1 and shaded red on the Site 2 Plan, and the individuals would have had to pass the land numbered 1 and shaded red on the Site 2 Plan to access the land on which they were trespassing.
15. On 10 April 2022, it was reported that Just Stop Oil protestors were able to gain access to part of the Kingsbury Oil Terminal of which Site 2 comprises part by digging a tunnel under Piccadilly Way. The protestors used a modified caravan to conceal the tunnel. The caravan was situated approximately 0.8 miles from the entrance cross roads to the land numbered 1 and shaded red on the Site 2 Plan (comprising the control centre) and in close proximity (approximately 0.2 miles)

from the land numbered 3 and shaded red on the Site 2 Plan (comprising the firewater pond) and the Site 2 Access Route shaded blue on the Site 2 Plan (**Tab20:UKOP5:67**).

16. On the same day (10 April 2022) Warwickshire Police reported that 29 individuals had been arrested in connection with the disruption around Kingsbury Oil Terminal for various offenses including, criminal damage, conspiracy to cause criminal damage and conspiracy to commit public nuisance (**Tab20:UKOP5:67**).
17. On 11 April 2022, Just Stop Oil issued a statement claiming that as of that morning, *"a number of people [were] still occupying a tunnel under a major access route to the Kingsbury Oil terminal in Warwickshire, 40 hours after it was first excavated"* (**Tab20:UKOP5:68-72**).

EVIDENCE OF DIRECT ACTION TARGETED AT OTHER OPERATORS FROM DATE OF ORDER TO 13 APRIL 2022

18. Since the date of the Order, there continues to be related direct action at sites owned by other operators including:
 - (a) a press release published on the Just Stop Oil website on 10 April 2022, indicated that campaigners have continued to *"disrupt oil supplies from oil terminals in Warwickshire, Hertfordshire and Essex, marking the tenth day of action in support of their demand that the UK government end new oil and gas projects in the UK."* The three sites referred to include the Kingsbury and Buncefield Terminals and the Gray's Inter Terminal in Essex. Just Stop Oil claims that direct action in these three sites has resulted in over 800 arrests with the group declaring their intention to *"continue to block oil terminals until the government makes a statement that it will end new oil and gas projects in the UK"* (**Tab20:UKOP5:73-75**);
 - (b) at 6:30 am on 10 April 2022, it was reported that Just Stop Oil protestors entered the Gray's Inter Terminal in Essex, climbed the loading bay pipework and locked themselves onto the pipework (**Tab20:UKOP5:76-78**). Images of individuals lying on the pipework were posted by Just Stop Oil's twitter account along with statements indicating that *"[t]his will stop when @10DowningStreet says they will #StopAllNewFossilFuelLicences!"* and *"[w]e will continue to disrupt until the govt makes a statement that it will end new oil & gas projects in the UK"* (**Tab20:UKOP5:79-80**). These protests resulted in the temporary suspension of operations at the site with Just Stop Oil indicating that *"40 students and young people have entered the Grays Inter terminal to cease works at the site"*; (**Tab20:UKOP5:81**).
 - (c) later that day (10 April 2022), it was reported that Essex Police had issued a statement describing the protests within the site as *"exceptionally dangerous"* (**Tab20:UKOP5:82-88**);
 - (d) on 11 April 2022, Just Stop Oil issued their own statement claiming that members of the group *"accessed the Inter Terminal in Essex [yesterday] bringing production to a halt"* (**Tab20:UKOP5:68-72**). The same statement indicated that, as of that morning, 12 protestors remained locked onto the pipework at the site.
19. It has been reported by the Sunday Times that direct action at these sites, and that referred to in my first witness statement, has resulted in the closure of approximately 1,200 garages across the south of England. It was reported that the Fair Fuel Campaign had stated that *"1 in 3 garages have run dry of petrol and/or diesel particularly in the south, because of... 'stop oil'"* (**Tab20:UKOP5:91-99**).

20. Just Stop Oil have stated on their website that direct action *"will continue to significantly impact on fuel availability at petrol pumps across the South East and the Midlands"* (**Tab20:UKOP5:73-75**). Photographs of gas station closures and lengthy gas station queues are at (**Tab20:UKOP5:89-90**), as reported by The Independent and the Mail Online.
21. Just Stop Oil claimed on their website on 10 April 2022 that *"[o]ver 400 people have joined actions that have succeeded in stopping operations for up to 24 hours at a time at 11 critical oil terminals that supply fuel to hundreds of petrol stations across the Midlands and South of England"* (**Tab20:UKOP5:68-72**).

EVIDENCE OF DIRECT ACTION BY MEMBERS OF EXTINCTION REBELLION

22. I referred at paragraph 43 to 49 of my first witness statement to Extinction Rebellion and Just Stop Oil as being the two principal campaign groups that have directly targeted the Sites and from who further direct action was anticipated. Information relating to the respective campaign group's strategies is at **Tab9:UKOP2:195-197** and **Tab9:UKOP2:222-230**. Both campaign groups are protesting to end the use of fossil fuels. However, since the date of the Order, direct action by Extinction Rebellion has been targeted at industries which members of the group consider to be affiliated to the fossil fuel industry as well as key transport hubs (in addition to the ongoing activities at oil terminals and infrastructure sites).
23. Recent examples include:
- (a) on 10 April 2022, it was reported that Extinction Rebellion members forced the closure of Lambeth and Vauxhall bridges in central London. Protestors in Vauxhall Bridge laid out a banner which read: *"FOR HEALTH'S SAKE STOP FINANCING FOSSIL FUELS"*. The bridges were eventually reopened after the Metropolitan Police imposed conditions under section 14 of the Public Order Act 1986 which enabled them to physically remove and, in some instances, arrest individuals on the bridge (**Tab20:UKOP5:100-109**); and
 - (b) on 12 April 2022, it was reported that Extinction Rebellion members forced the closure of the world's biggest insurance market, Lloyd's of London, by preventing workers from entering the building with the intention of closing the business for the day (**Tab20:UKOP5:110-114**). Extinction Rebellion posted an article on their website, proclaiming that they have *"closed all the entrances to Lloyd's of London's building in the City of London"* and demanding that Lloyd's *"stop insuring fossil fuel companies and insure climate justice instead"* (**Tab20:UKOP5:115-121**).

SUMMARY

24. I continue to believe that in the absence of further injunctive relief being granted by the Court in the terms sought, there is a real risk of imminent trespass and / or interference with the private access routes in relation to both Sites. The Claimants are making this Application in an effort to minimise the risk of a future trespass and / or interference occurring at each of the Sites.
25. Furthermore, I consider that, whilst the campaign of *"civil disobedience"* across the UK by members of the Extinction Rebellion and Just Stop Oil campaign groups is ongoing, the fact that there has been a reduction in incidents directly affecting Sites 1 and 2 since the date of the Order, is a direct consequence of the Order acting as an immediate deterrent and significantly reducing the risk of further direct action at the Sites.
26. For the reasons set out in this statement and the further witness statements made in support of this Application, I respectfully request that the Court grants the further order sought by the Claimants.

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.

Signed:  Dated: 14 April 2022

John Michael Armstrong

IN THE HIGH COURT OF JUSTICE

Claim No. PT-2022-000303

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

CHANCERY DIVISION

PROPERTY TRUSTS AND PROBATE LIST

[...]

[...]

B E T W E E N

(1) UNITED KINGDOM OIL PIPELINES LIMITED

(2) WEST LONDON PIPELINE AND STORAGE LIMITED

Claimants / Applicants

and

(1) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT CONSENT, AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN, ON LAND AND BUILDINGS AT AND COMPRISING PART OF (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED RED ON THE ATTACHED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE (SHOWN FOR IDENTIFICATION SHADED RED ON THE ATTACHED SITE 2 PLAN)

First Defendants/Respondents

(2) PERSONS UNKNOWN WITHOUT CONSENT, AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN, OBSTRUCTING OR INTERFERING WITH THE FIRST CLAIMANT'S ACCESS OVER PRIVATE ACCESS ROADS ADJACENT TO (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED BLUE ON THE ATTACHED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE (SHOWN FOR IDENTIFICATION SHADED BLUE ON THE ATTACHED SITE 2 PLAN)

Second Defendants/Respondents

DRAFT ORDER AGAINST THE FIRST AND SECOND DEFENDANTS

(COLLECTIVELY "THE DEFENDANTS")

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible.

If you disobey this Order you may be found guilty of contempt of court and you may be sent to prison or your assets seized.

You have the right to apply to the court to vary or discharge this order (which is explained below).

RECITALS

UPON the hearing of the Claimants' Application dated 8 April 2022

UPON hearing Leading Counsel and Junior Counsel for the Claimants

AND UPON READING the evidence recorded on the Court file as having been read

AND UPON the Claimants giving and the Court accepting the undertaking listed in Schedule 3

AND UPON the Claimants acknowledging that they do not intend to prohibit any lawful protest outside any of the sites referred to in this Order and that this Order is not intended to prohibit such lawful protest

IT IS ORDERED THAT:

THE INJUNCTIONS

1. Until the Return Date referred to in paragraph 9 of this Order or further order in the interim:

(a) **BUNCEFIELD (SITE 1)**

2. The First Defendants and each of them are forbidden from (a) entering or remaining upon the land or buildings described in and defined as "**Buncefield (Site 1)**" in Schedule 2 to this Order and which are shown for illustration purposes shaded red on the plan annexed to Schedule 4 of the Order ("**the Site 1 Plan**"), or (b) from causing damage to Buncefield (Site 1) or (c) removing equipment from Buncefield (Site 1), without the consent of the Claimants.
3. The Second Defendants and each of them are forbidden from obstructing or otherwise interfering with the First Claimant's access over the private access road on the land adjoining Buncefield Site 1 (the "**Site 1 Access Route**"), which is shown for illustration purposes shaded blue on the Site 1 Plan, for access and egress between Buncefield (Site 1) and the public highway.

(b) KINGSBURY (SITE 2)

4. The First Defendants and each of them are forbidden from (a) entering or remaining upon the land or buildings described in and defined as "**Kingsbury (Site 2)**" in Schedule 2 to this Order and which are shown for illustration purposes shaded red on the plan annexed to Schedule 5 of the Order (the "**Site 2 Plan**") or (b) from causing damage to Kingsbury (Site 2) or (c) removing equipment from Kingsbury (Site 2), without the consent of the First Claimant.
5. The Second Defendants and each of them are forbidden from obstructing or otherwise interfering with the First Claimant's access over the private access road on the land adjoining Site 2 (the "**Site 2 Access Route**"), which is shown for illustration purposes shaded blue on the Site 2 Plan, for access and egress between Kingsbury (Site 2) and the public highway.

VARIATION OF THIS ORDER

6. Anyone served or notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimants' solicitors 48 hours' notice of such application. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Claimants' solicitors at least 24 hours in advance of any hearing.
7. 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.
8. The Claimants have liberty to apply to extend or vary this Order or to seek further directions.

RETURN DATE

9. A further return date hearing will be fixed for 20 April 2023 (the "**Return Date**") with a time estimate of 3 hours.
10. Permission for the Claimants to file and serve any further evidence by 4.30pm on 6 April 2023.
11. Permission for the Defendants to file and serve evidence by 4.30pm on 13 April 2023

INTERPRETATION OF THIS ORDER

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

SERVICE OF THIS ORDER

13. Pursuant to CPR 6.15, 6.27 and 81.4(2)(c) and (d), service of this Order, shall be effected as follows:
- (a) Fixing copies thereof in clear transparent sealed containers at a minimum number of 2 prominent locations on the perimeter of each of the Sites together with a notice which states that copies of the Order may be obtained from the Claimants' solicitors, Fieldfisher LLP, Riverbank House, 2 Swan Lane, London, EC4R 3TT (tel: 020 7861 4000) email: UKOPinjunction@fieldfisher.com via, and may be viewed at, the web link referred to in paragraph 12(b) of this Order;
 - (b) Posting the Order at the following web link: <https://ukop.azurewebsites.net>;
 - (c) Fixing warning notices (in substantially the same form as those set out in Schedule 6 and 7 to the Order dated 8 April 2022, but as amended to reflect the terms of this Order) as follows in not less than A2 size:
 - (i) In respect of **Buncefield (Site 1)** by affixing the form of site injunction notice (the "**Site 1 Notice**") in clearly visible locations (including at entranceways, access points, gates and attached to the perimeter fencing) around and comprising part of Site 1; and
 - (ii) In respect of **Kingsbury (Site 2)** by affixing the form of site injunction notice (the "**Site 2 Notice**") in clearly visible locations (including at entranceways, access points, gates and attached to the perimeter fencing) around and comprising part of Kingsbury (Site 2);
 - (d) Sending an email to each of the following email addresses with the information that copies of the Order may be viewed at the web link referred to in paragraph 12(b) above:
 - (i) xr-legal@riseup.net;
 - (ii) juststopoil@protonmail.co.uk;
 - (iii) juststopoilpress@protonmail.com
 - (iv) juststopoil@protonmail.com
14. Pursuant to CPR 6.15(3), 6.27 and 81.4(2)(c) and (d), the Order will be deemed to be served on the latest date on which all of the methods of service referred to above have been completed, such date to be verified by the completion of a certificate of service.
15. Pursuant to CPR 6.15, 6.27 and 81.4(2)(c) and (d), the steps identified above shall stand as good service of the Order.

ALTERNATIVE SERVICE PROVISIONS FOR FUTURE APPLICATIONS BY THE CLAIMANTS IN THIS CLAIM

16. Pursuant to CPR 6.15, 6.27 and 81.4(2)(c) and (d), service of any future applications in this Claim by the Claimants and their evidence in support, shall be effected as follows:
- (a) Fixing copies thereof in clear transparent sealed containers at a minimum number of 2 prominent locations on the perimeter of each of the Sites together with a notice which states that copies of the documents may be obtained from the Claimants' solicitors, Fieldfisher LLP, Riverbank House, 2 Swan Lane, London, EC4R 3TT (tel: 020 7861 4000) email: UKOPinjunction@fieldfisher.com via, and may be viewed at, the web link referred to in paragraph 16(b) of this Order;
 - (b) Posting copies of these documents at the following web link: <https://ukop.azurewebsites.net>;
 - (c) Sending an email to each of the following email addresses with the information that copies of the documents may be viewed at the web link referred to in paragraph 16(b) above:
 - (i) xr-legal@riseup.net;
 - (ii) juststopoil@protonmail.co.uk
 - (iii) juststopoilpress@protonmail.com
 - (iv) juststopoil@protonmail.com
17. Pursuant to CPR 6.15(3), 6.27 and 81.4(2)(c) and (d), any documents served pursuant to the provision in paragraph 16 above will be deemed to be served on the latest date on which all of the methods of service referred to in paragraph 16 above have been completed in respect thereof, such date to be verified by the completion of a certificate of service.
18. Pursuant to CPR 6.15, 6.27 and 81.4(2)(c) and (d), the steps identified in paragraph 16 above shall stand as good service.

COSTS

19. Costs reserved.

COMMUNICATIONS WITH THE COURT

20. All communications about this Order should be sent to:

Court Manager
High Court of Justice
Chancery Division
Rolls Building
7 Rolls Building
Fetter Lane
London
EC4A 1NL

The telephone number is 020 7947 7501. The offices are open weekdays 10.00 a.m. to 4.30 p.m.

Out of hours telephone number is 020 7947 6260

21. Name and address of the Claimants' legal representatives

Fieldfisher LLP
Riverbank House
2 Swan Lane
London
EC4R 3TT

Telephone: 020 7861 4000

Fax: 020 7488 0084

Out of hours telephone number: 07711 088057

Reference: OTD/UK01.000162.00301

This Order shall be served by the Claimants on the Defendants. The Court has provided a sealed copy of this Order to the Claimants at:

Fieldfisher LLP
Riverbank House,
2 Swan Lane,
London
EC4R 3TT

Reference: OTD/000162

SCHEDULE 1

1. Witness Statement of Peter Davis dated 7 April 2022
2. Witness Statement of John Armstrong dated 7 April 2022
3. Witness Statement of Daniel Owen Christopher Talfan Davies dated 8 April 2022
4. Second Witness Statement of John Armstrong dated 14 April 2022
5. Second Witness Statement of Daniel Owen Christopher Talfan Davies dated 14 April 2022

SCHEDULE 2

THE SITES

Buncefield (Site 1)

1. The freehold land at:
 - (a) Land and buildings on the south side of Cherry Tree Lane, Hemel Hempstead which is registered at the Land Registry under title number HD485114 and marked 1 on the Site 1 Plan;
 - (b) Land to the north of Cherry Tree Lane, Hemel Hempstead which is registered at the Land Registry under title number HD485115 and marked 2 on the Site 1 Plan;
 - (c) Land on the west side of Buncefield Lane, Hemel Hempstead which is registered at the Land Registry under title number HD485116 and marked 3 on the Site 1 Plan;
 - (d) Land on the north east and south west side of Cherry Tree Lane, Hemel Hempstead registered at the Land Registry under title number HD485118 and marked 5 on the Site 1 Plan;
2. The leasehold land at:
 - (a) Land on the north side of Cherry Tree Lane, Hemel Hempstead, as more particularly described by a lease dated 23 September 2013 made between (1) Total UK Limited and (2) United Kingdom Oil Pipelines Limited which is registered at the Land Registry under title number HD529733 and marked 4 on the Site 1 Plan.

Kingsbury (Site 2)

3. The freehold land at:
 - (a) All that piece of land at Kingsbury in the County of Warwick comprising 4.96 acres or thereabouts as more particularly described by a conveyance dated 31 March 1967 and made between (1) Shell-Mex and B.P. Limited and (2) United Oil Kingdom Pipelines Limited and marked 1 on the Site 2 Plan;
 - (b) Land on the south-east side of Trinity Road, Kingsbury, Tamworth which is registered at the Land Registry under title number WK468465 and marked 2 on the Site 2 Plan.
4. The leasehold land at:
 - (a) the Fire-Water Pond and the Lagoon being land at Kingsbury in the County of Warwick, as more particularly described in a lease dated 3 November 2021 made between (1) Secretary of State for Defence and (2) United Kingdom Oil Pipelines Limited and marked 3 on the Site 2 Plan.

(together, the "**Sites**")

SCHEDULE 3

1. On the making of this Order, the Claimants undertake as follows: if the Court later finds that this Order has caused loss to the Defendants, and decides that the Defendants should be compensated for that loss, the Claimants will comply with any order the Court may make.

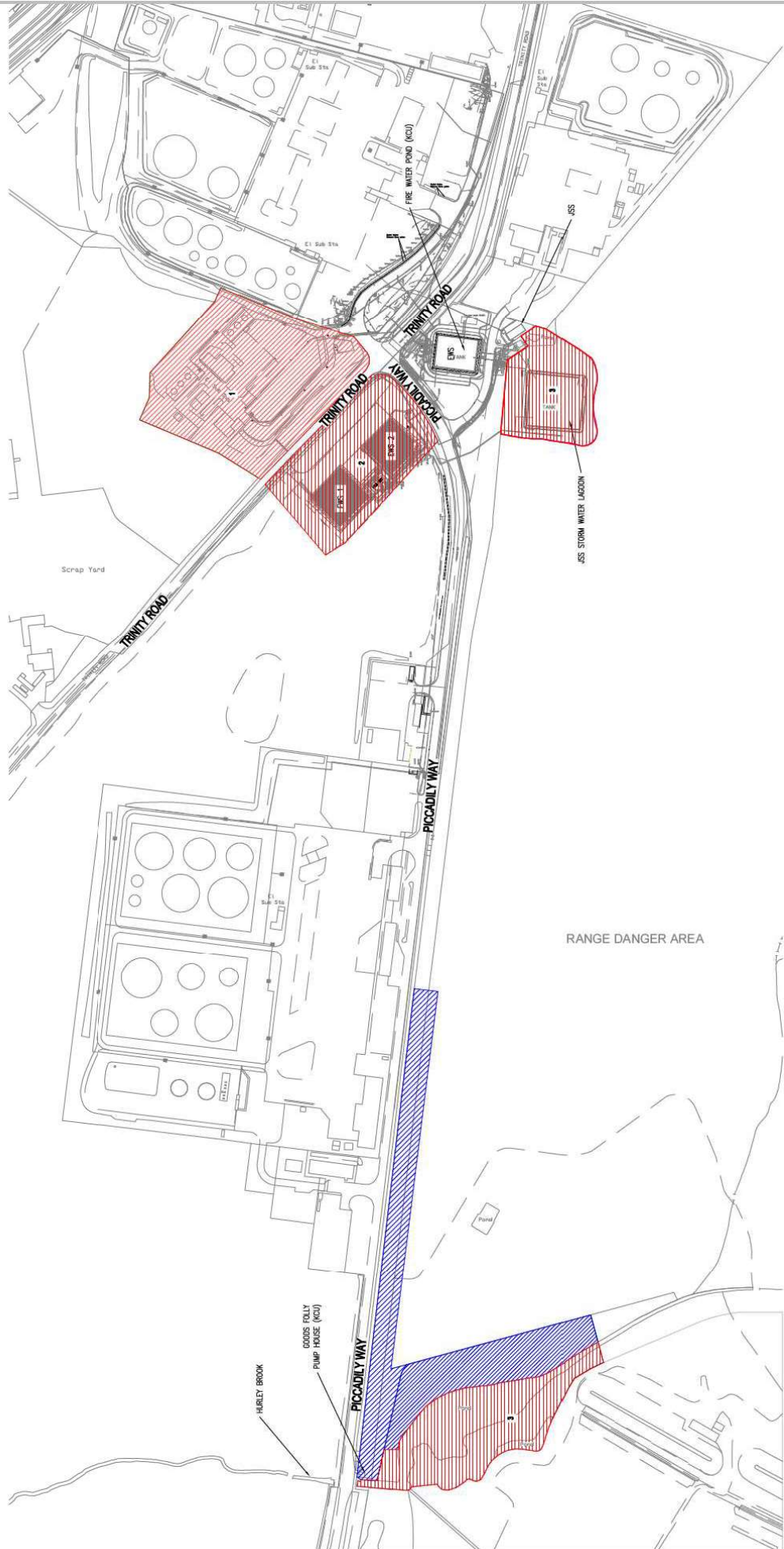
SCHEDULE 4

Plan of Buncefield (Site 1) ("**Site 1 Plan**")



SCHEDULE 5

Plan of Kingsbury (Site 2) ("**Site 2 Plan**")



HIGH COURT INJUNCTION IN FORCE

NOTICE OF HIGH COURT ORDER DATED 20 APRIL 2022

TO: PERSONS UNKNOWN ACTING IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN AND/OR THE JUST STOP OIL CAMPAIGN AND AS MORE PARTICULARLY DEFINED IN AND DESCRIBED AS THE FIRST DEFENDANT OR THE SECOND DEFENDANT IN THE ORDER (THE "DEFENDANTS")

FROM: (1) UNITED KINGDOM OIL PIPELINES LIMITED AND (2) WEST LONDON PIPELINE AND STORAGE LIMITED (THE "CLAIMANTS")

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

IT IS ORDERED THAT, UNTIL [INSERT DATE], THIS INJUNCTION PROHIBITS THE DEFENDANTS FROM:

- ENTERING OR REMAINING UPON THE LAND SHADED RED ON THE PLAN SET OUT IN THIS NOTICE (THE "PLAN") OR FROM CAUSING DAMAGE TO, OR REMOVING EQUIPMENT FROM THE LAND SHADED RED ON THE PLAN WITHOUT THE CONSENT OF THE CLAIMANTS; AND
- OBSTRUCTING OR OTHERWISE INTERFERING WITH THE FIRST CLAIMANT'S ACCESS OVER THE PRIVATE ACCESS ROAD SHADED BLUE ON THE PLAN AND WHICH ADJOINS THE LAND SHADED RED, FOR ACCESS AND EGRESS BETWEEN THE LAND SHADED RED AND THE PUBLIC HIGHWAY.

THIS MEANS THAT YOU MUST NOT GO BEYOND THIS NOTICE AND ENTER THIS SITE WITHOUT PERMISSION.

THIS ALSO MEANS THAT YOU MUST NOT OBSTRUCT OR OTHERWISE INTERFERE WITH THE FIRST CLAIMANT'S ACCESS OVER THE ACCESS ROAD SHADED BLUE. IF YOU DO, YOU MAY BE SENT TO PRISON OR HAVE YOUR ASSETS SEIZED.

REFERENCES TO THE 'CLAIMANT' OR 'CLAIMANTS' IN THIS ORDER MEANS ONE OR MORE OF THE AFOREMENTIONED CLAIMANTS AND EACH OF ITS AND THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, EMPLOYEES, PARTNERS, CONSULTANTS AND OTHER VISITORS.

Copies of the Court Order and other documents in the proceedings may be viewed at: <https://ukop.azurewebsites.net>

Claimants' solicitors: Fieldfisher LLP whose address is Riverbank House, 2 Swan Lane, London EC4R 3TT (Telephone number: 0207 861 4000; email address: UKOPinjunction@fieldfisher.com)

The Claimants will make available to any person (who has provided their name(s), address(es) and proof of identity to the Claimants' solicitors) upon written application to the Claimants' solicitors (either in writing at their said offices or by email to UKOPinjunction@fieldfisher.com and in either case quoting reference OTD/UKOP), using an online file hosting service, the Court documents, witness evidence and exhibits, as soon as possible thereafter and in either case within one clear working day from the first working day on which such written application is received.

Court communications: all communications about this Order should be sent to the Court Manager, High Court of Justice (details found at <https://www.find-court-tribunal.service.gov.uk/courts/rolls-building-business-and-property-courts-of-england-wales>)



The freehold land at:

1. Land and buildings on the south side of Cherry Tree Lane, Hemel Hempstead which is registered at the Land Registry under title number HD485114 and marked 1 on the Plan above;
2. Land to the north of Cherry Tree Lane, Hemel Hempstead which is registered at the Land Registry under title number HD485115 and marked 2 on the Plan above;
3. Land on the west side of Buncefield Lane, Hemel Hempstead which is registered at the Land Registry under title number HD485116 and marked 3 on the Plan above; and
4. Land on the north east and south west side of Cherry Tree Lane, Hemel Hempstead registered at the Land Registry under title number HD485118 and marked 5 on the Plan above.

The leasehold land at:

1. land on the north side of Cherry Tree Lane, Hemel Hempstead, as more particularly described by a lease dated 23 September 2013 made between (1) Total UK Limited and (2) United Kingdom Oil Pipelines Limited which is registered at the Land Registry under title number HD529733 and marked 4 on the Plan above.

HIGH COURT INJUNCTION IN FORCE

NOTICE OF HIGH COURT ORDER DATED 20 APRIL 2022

TO: PERSONS UNKNOWN ACTING IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN AND/OR THE JUST STOP OIL CAMPAIGN AND AS MORE PARTICULARLY DEFINED IN AND DESCRIBED AS THE FIRST DEFENDANT OR THE SECOND DEFENDANT IN THE ORDER (THE "DEFENDANTS")

FROM: (1) UNITED KINGDOM OIL PIPELINES LIMITED AND (2) WEST LONDON PIPELINE AND STORAGE LIMITED (THE "CLAIMANTS")

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

IT IS ORDERED THAT, UNTIL [INSERT DATE], THIS INJUNCTION PROHIBITS THE DEFENDANTS FROM:

- ENTERING OR REMAINING UPON THE LAND SHADED RED ON THE PLAN SET OUT IN THIS NOTICE (THE "PLAN") OR FROM CAUSING DAMAGE TO, OR REMOVING EQUIPMENT FROM THE LAND SHADED RED ON THE PLAN WITHOUT THE CONSENT OF THE CLAIMANTS; AND
- OBSTRUCTING OR OTHERWISE INTERFERING WITH THE FIRST CLAIMANT'S ACCESS OVER THE PRIVATE ACCESS ROAD SHADED BLUE ON THE PLAN AND WHICH ADJOINS THE LAND SHADED RED, FOR ACCESS AND EGRESS BETWEEN THE LAND SHADED RED AND THE PUBLIC HIGHWAY.

THIS MEANS THAT YOU MUST NOT GO BEYOND THIS NOTICE AND ENTER THIS SITE WITHOUT PERMISSION.

THIS ALSO MEANS THAT YOU MUST NOT OBSTRUCT OR OTHERWISE INTERFERE WITH THE FIRST CLAIMANT'S ACCESS OVER THE ACCESS ROAD SHADED BLUE. IF YOU DO, YOU MAY BE SENT TO PRISON OR HAVE YOUR ASSETS SEIZED.

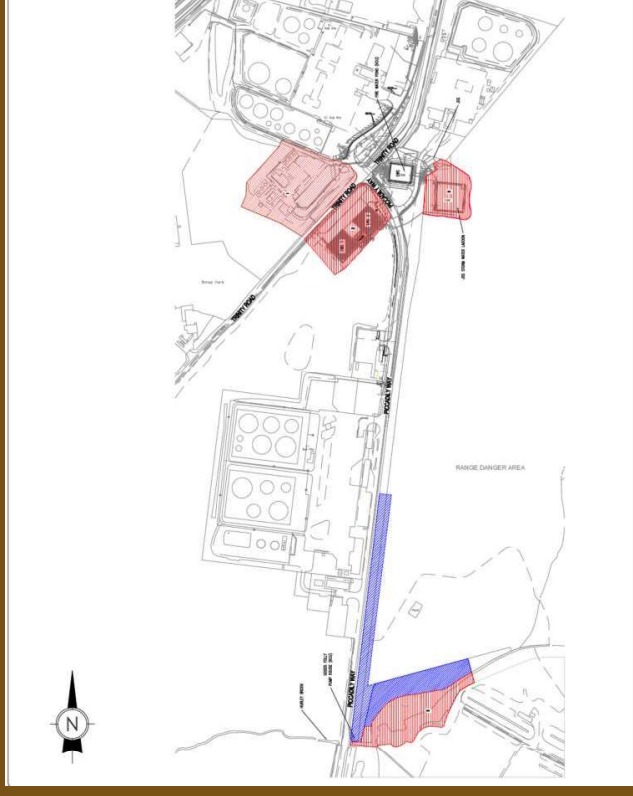
REFERENCES TO THE 'CLAIMANT' OR 'CLAIMANTS' IN THIS ORDER MEANS ONE OR MORE OF THE AFOREMENTIONED CLAIMANTS AND EACH OF ITS AND THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, EMPLOYEES, PARTNERS, CONSULTANTS AND OTHER VISITORS.

Copies of the Court Order and other documents in the proceedings may be viewed at: <https://ukop.azurewebsites.net>

Claimants' solicitors: Fieldfisher LLP whose address is Riverbank House, 2 Swan Lane, London EC4R 3TT (Telephone number: 0207 861 4000; email address: UKOPinjunction@fieldfisher.com)

The Claimants will make available to any person (who has provided their name(s), address(es) and proof of identity to the Claimants' solicitors) upon written application to the Claimants' solicitors (either in writing at their said offices or by email to UKOPinjunction@fieldfisher.com and in either case quoting reference OTD/UKOP), using an online file hosting service, the Court documents, witness evidence and exhibits, as soon as possible thereafter and in either case within one clear working day from the first working day on which such written application is received.

Court communications: all communications about this Order should be sent to the Court Manager, High Court of Justice (details found at <https://www.find-court-tribunal.service.gov.uk/courts/rolls-building-business-and-property-courts-of-england-wales>)



The freehold land at:

- All that piece of land at Kingsbury in the County of Warwick comprising 4.96 acres or thereabouts as more particularly described by a conveyance dated 31 March 1967 and made between (1) Shell-Mex and B.P. Limited and (2) United Oil Kingdom Pipelines Limited and marked 1 on the plan above; and
- Land on the south-east side of Trinity Road, Kingsbury, Tamworth which is registered at the Land Registry under title number WK468465 and marked 2 on the plan above;

The leasehold land at:

- The Fire-Water Pond and the Lagoon being land at Kingsbury in the County of Warwick, as more particularly described in a lease dated 11 March 2021 made between (1) The Secretary of State for Defence and (2) United Kingdom Oil Pipelines Limited and marked 3 on the plan above.

IN THE HIGH COURT OF JUSTICE

Claim No. PT-2022-000303

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

CHANCERY DIVISION

PROPERTY TRUSTS AND PROBATE LIST

[...]

[...]

B E T W E E N

(1) UNITED KINGDOM OIL PIPELINES LIMITED

(2) WEST LONDON PIPELINE AND STORAGE LIMITED

Claimants / Applicants

and

(1) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT CONSENT, AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN, ON LAND AND BUILDINGS AT AND COMPRISING PART OF (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED RED ON THE ATTACHED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE (SHOWN FOR IDENTIFICATION SHADED RED ON THE ATTACHED SITE 2 PLAN)

First Defendants/Respondents

(2) PERSONS UNKNOWN WITHOUT CONSENT, AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN, OBSTRUCTING OR INTERFERING WITH THE FIRST CLAIMANT'S ACCESS OVER PRIVATE ACCESS ROADS ADJACENT TO (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED BLUE ON THE ATTACHED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE (SHOWN FOR IDENTIFICATION SHADED BLUE ON THE ATTACHED SITE 2 PLAN)

Second Defendants/Respondents

DRAFT ORDER AGAINST THE FIRST AND SECOND DEFENDANTS

(COLLECTIVELY "THE DEFENDANTS")

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible.

If you disobey this Order you may be found guilty of contempt of court and you may be sent to prison or your assets seized.

You have the right to apply to the court to vary or discharge this order (which is explained below).

RECITALS

UPON the hearing of the Claimants' Application dated 8 April 2022

UPON hearing Leading Counsel and Junior Counsel for the Claimants

AND UPON READING the evidence recorded on the Court file as having been read

AND UPON the Claimants giving and the Court accepting the undertaking listed in Schedule 3

AND UPON the Claimants acknowledging that they do not intend to prohibit any lawful protest outside any of the sites referred to in this Order and that this Order is not intended to prohibit such lawful protest

IT IS ORDERED THAT:

THE INJUNCTIONS

1. Until ~~trial~~ [the Return Date referred to in paragraph 9 of this Order](#) or further order [in the interim](#):

(a) **BUNCEFIELD (SITE 1)**

2. The First Defendants and each of them are forbidden from (a) entering or remaining upon the land or buildings described in and defined as "**Buncefield (Site 1)**" in Schedule 2 to this Order and which are shown for illustration purposes shaded red on the plan annexed to Schedule 4 of the Order ("**the Site 1 Plan**"), or (b) from causing damage to Buncefield (Site 1) or (c) removing equipment from Buncefield (Site 1), without the consent of the Claimants.
3. The Second Defendants and each of them are forbidden from obstructing or otherwise interfering with the First Claimant's access over the private access road on the land adjoining Buncefield Site 1 (the "**Site 1 Access Route**"), which is shown for illustration purposes shaded blue on the Site 1 Plan, for access and egress between Buncefield (Site 1) and the public highway.

(b) KINGSBURY (SITE 2)

4. The First Defendants and each of them are forbidden from (a) entering or remaining upon the land or buildings described in and defined as "**Kingsbury (Site 2)**" in Schedule 2 to this Order and which are shown for illustration purposes shaded red on the plan annexed to Schedule 5 of the Order (the "**Site 2 Plan**") or (b) from causing damage to Kingsbury (Site 2) or (c) removing equipment from Kingsbury (Site 2), without the consent of the First Claimant.
5. The Second Defendants and each of them are forbidden from obstructing or otherwise interfering with the First Claimant's access over the private access road on the land adjoining Site 2 (the "**Site 2 Access Route**"), which is shown for illustration purposes shaded blue on the Site 2 Plan, for access and egress between Kingsbury (Site 2) and the public highway.

VARIATION OF THIS ORDER

6. Anyone served or notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimants' solicitors 48 hours' notice of such application. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Claimants' solicitors at least 24 hours in advance of any hearing.
7. 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.
8. The Claimants have liberty to apply to extend or vary this Order or to seek further directions.

RETURN DATE

9. A further return date hearing will be fixed for 20 April 2023 (the "**Return Date**") with a time estimate of 3 hours.
10. Permission for the Claimants to file and serve any further evidence by 4.30pm on 6 April 2023.
11. Permission for the Defendants to file and serve evidence by 4.30pm on 13 April 2023

INTERPRETATION OF THIS ORDER

12. ~~9.~~ A Defendant who is ordered not to do something must not do it him/herself/themselves or in any other way. He/she/they must not do it through another acting on his/her/their behalf or on his/her/their instructions or with his/her/their encouragement.

SERVICE OF THIS ORDER

13. ~~10.~~ Pursuant to CPR 6.15, 6.27 and 81.4(2)(c) and (d), service of this Order, shall be effected as follows:

- (a) Fixing copies thereof in clear transparent sealed containers at a minimum number of 2 prominent locations on the perimeter of each of the Sites together with a notice which states that copies of the Order may be obtained from the Claimants' solicitors, Fieldfisher LLP, Riverbank House, 2 Swan Lane, London, EC4R 3TT (tel: 020 7861 4000) email: UKOPinjunction@fieldfisher.com via, and may be viewed at, the web link referred to in paragraph ~~10~~12(b) of this Order;
- (b) Posting the Order at the following web link: <https://ukop.azurewebsites.net>;
- (c) Fixing warning notices (in substantially the same form as those set out in Schedule 6 and 7 to the Order dated 8 April 2022, but as amended to reflect the terms of this Order) as follows in not less than A2 size:
 - (i) In respect of **Buncefield (Site 1)** by affixing the form of site injunction notice (the "**Site 1 Notice**") in clearly visible locations (including at entranceways, access points, gates and attached to the perimeter fencing) around and comprising part of Site 1; and
 - (ii) In respect of **Kingsbury (Site 2)** by affixing the form of site injunction notice (the "**Site 2 Notice**") in clearly visible locations (including at entranceways, access points, gates and attached to the perimeter fencing) around and comprising part of Kingsbury (Site 2);
- (d) Sending an email to each of the following email addresses with the information that copies of the Order may be viewed at the web link referred to in paragraph ~~10~~12(b) above:
 - (i) xr-legal@riseup.net;
 - (ii) juststopoil@protonmail.co.uk;
 - (iii) juststopoilpress@protonmail.com
 - (iv) juststopoil@protonmail.com

14. ~~11.~~ Pursuant to CPR 6.15(3), 6.27 and 81.4(2)(c) and (d), the Order will be deemed to be served on the latest date on which all of the methods of service referred to above have been completed, such date to be verified by the completion of a certificate of service.

15. ~~12.~~ Pursuant to CPR 6.15, 6.27 and 81.4(2)(c) and (d), the steps identified above shall stand as good service of the Order.

ALTERNATIVE SERVICE PROVISIONS FOR FUTURE APPLICATIONS BY THE CLAIMANTS IN THIS CLAIM

16. ~~13.~~ Pursuant to CPR 6.15, 6.27 and 81.4(2)(c) and (d), service of any future applications in this Claim by the Claimants and their evidence in support, shall be effected as follows:

- (a) Fixing copies thereof in clear transparent sealed containers at a minimum number of 2 prominent locations on the perimeter of each of the Sites together with a notice which states that copies of the documents may be obtained from the Claimants' solicitors, Fieldfisher LLP, Riverbank House, 2 Swan Lane, London, EC4R 3TT (tel: 020 7861 4000) email: UKOPinjunction@fieldfisher.com via, and may be viewed at, the web link referred to in paragraph ~~13~~16(b) of this Order;
- (b) Posting copies of these documents at the following web link:
<https://ukop.azurewebsites.net>;
- (c) Sending an email to each of the following email addresses with the information that copies of the documents may be viewed at the web link referred to in paragraph ~~13~~16(b) above:
 - (i) xr-legal@riseup.net;
 - (ii) juststopoil@protonmail.co.uk
 - (iii) juststopoilpress@protonmail.com
 - (iv) juststopoil@protonmail.com

17. ~~14.~~ Pursuant to CPR 6.15(3), 6.27 and 81.4(2)(c) and (d), any documents served pursuant to the provision in paragraph ~~13~~16 above will be deemed to be served on the latest date on which all of the methods of service referred to in paragraph ~~13~~16 above have been completed in respect thereof, such date to be verified by the completion of a certificate of service.

18. ~~15.~~ Pursuant to CPR 6.15, 6.27 and 81.4(2)(c) and (d), the steps identified in paragraph ~~13~~16 above shall stand as good service.

COSTS

19. ~~16.~~ Costs reserved.

COMMUNICATIONS WITH THE COURT

20. ~~17.~~ All communications about this Order should be sent to:

Court Manager
High Court of Justice
Chancery Division
Rolls Building
7 Rolls Building

Fetter Lane
London
EC4A 1NL

The telephone number is 020 7947 7501. The offices are open weekdays 10.00 a.m. to 4.30 p.m.

Out of hours telephone number is 020 7947 6260

21. ~~18.~~ Name and address of the Claimants' legal representatives

Fieldfisher LLP
Riverbank House
2 Swan Lane
London
EC4R 3TT

Telephone: 020 7861 4000

Fax: 020 7488 0084

Out of hours telephone number: 07711 088057

Reference: OTD/UK01.000162.00301

This Order shall be served by the Claimants on the Defendants. The Court has provided a sealed copy of this Order to the Claimants at:

Fieldfisher LLP
Riverbank House,
2 Swan Lane,
London
EC4R 3TT

Reference: OTD/000162

SCHEDULE 1

1. Witness Statement of Peter Davis dated 7 April 2022
2. Witness Statement of John Armstrong dated 7 April 2022
3. Witness Statement of Daniel Owen Christopher Talfan Davies dated 8 April 2022
4. [Second Witness Statement of John Armstrong dated 14 April 2022](#)
5. [Second Witness Statement of Daniel Owen Christopher Talfan Davies dated 14 April 2022](#)

SCHEDULE 2

THE SITES

Buncefield (Site 1)

1. The freehold land at:
 - (a) Land and buildings on the south side of Cherry Tree Lane, Hemel Hempstead which is registered at the Land Registry under title number HD485114 and marked 1 on the Site 1 Plan;
 - (b) Land to the north of Cherry Tree Lane, Hemel Hempstead which is registered at the Land Registry under title number HD485115 and marked 2 on the Site 1 Plan;
 - (c) Land on the west side of Buncefield Lane, Hemel Hempstead which is registered at the Land Registry under title number HD485116 and marked 3 on the Site 1 Plan;
 - (d) Land on the north east and south west side of ~~Three~~-Cherry ~~Trees~~Tree Lane, Hemel Hempstead registered at the Land Registry under title number HD485118 and marked 5 on the Site 1 Plan;
2. The leasehold land at:
 - (a) ~~land~~Land on the north side of Cherry Tree Lane, Hemel Hempstead, as more particularly described by a lease dated 23 September 2013 made between (1) Total UK Limited and (2) United ~~Oil~~-Kingdom Oil Pipelines Limited which is registered at the Land Registry under title number HD529733 and marked 4 on the Site 1 Plan.

Kingsbury (Site 2)

3. The freehold land at:
 - (a) All that piece of land at Kingsbury in the County of Warwick comprising 4.96 acres or thereabouts as more particularly described by a conveyance dated 31 March 1967 and made between (1) Shell-Mex and B.P. Limited and (2) United Oil Kingdom Pipelines Limited and marked 1 on the Site 2 Plan;
 - (b) Land on the south-east side of Trinity Road, Kingsbury, Tamworth which is registered at the Land Registry under title number WK468465 and marked 2 on the Site 2 Plan.
4. The leasehold land at:
 - (a) the Fire-Water Pond and the Lagoon being land at Kingsbury in the County of Warwick, as more particularly described in a lease dated 3 November 2021 made between (1) ~~The~~ Secretary of State for Defence and (2) United ~~Oil~~-Kingdom Oil Pipelines Limited and marked 3 on the Site 2 Plan.

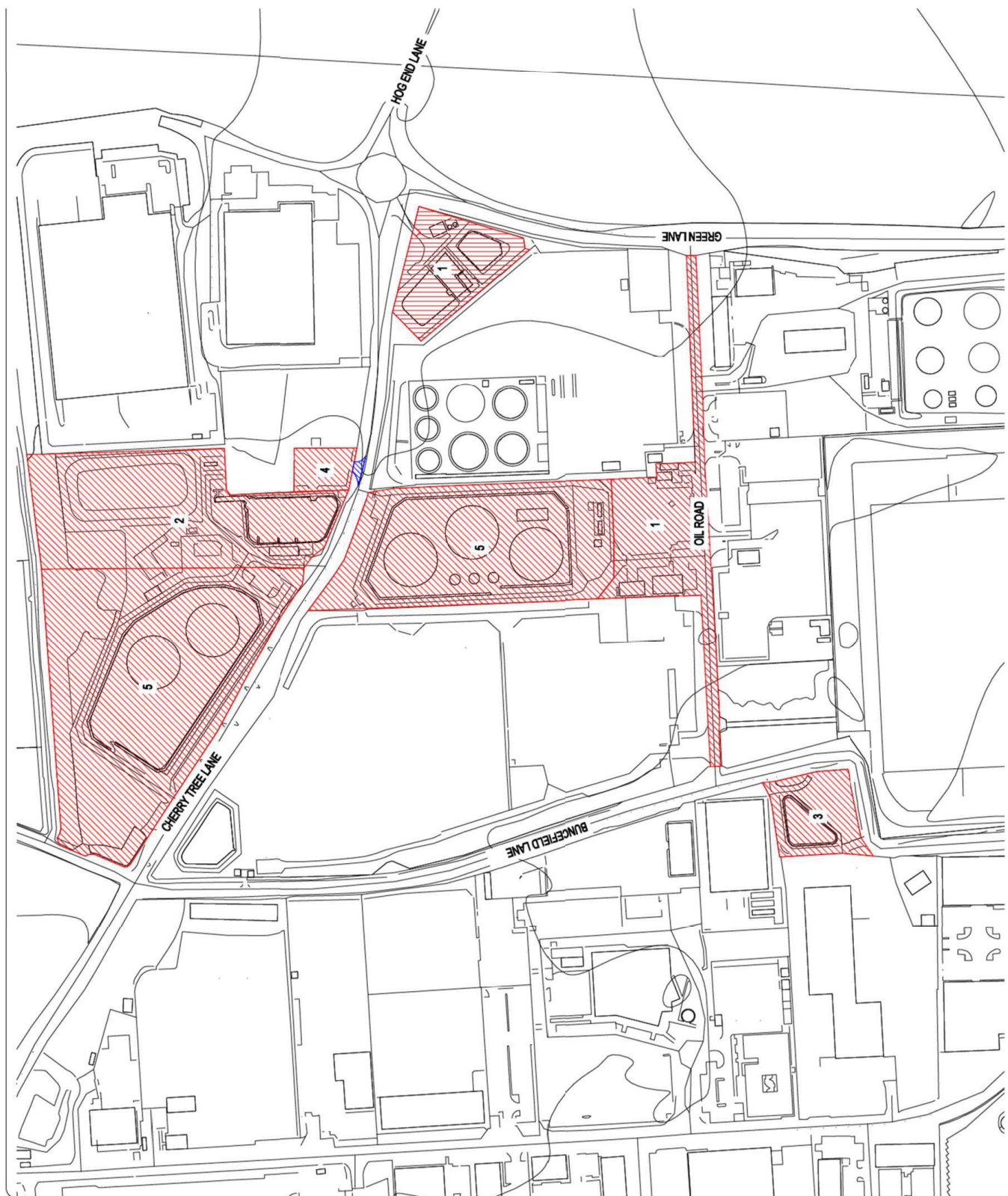
(together, the "Sites")

SCHEDULE 3

1. ~~4.~~ On the making of this Order, the Claimants undertake as follows: if the Court later finds that this Order has caused loss to the Defendants, and decides that the Defendants should be compensated for that loss, the Claimants will comply with any order the Court may make.

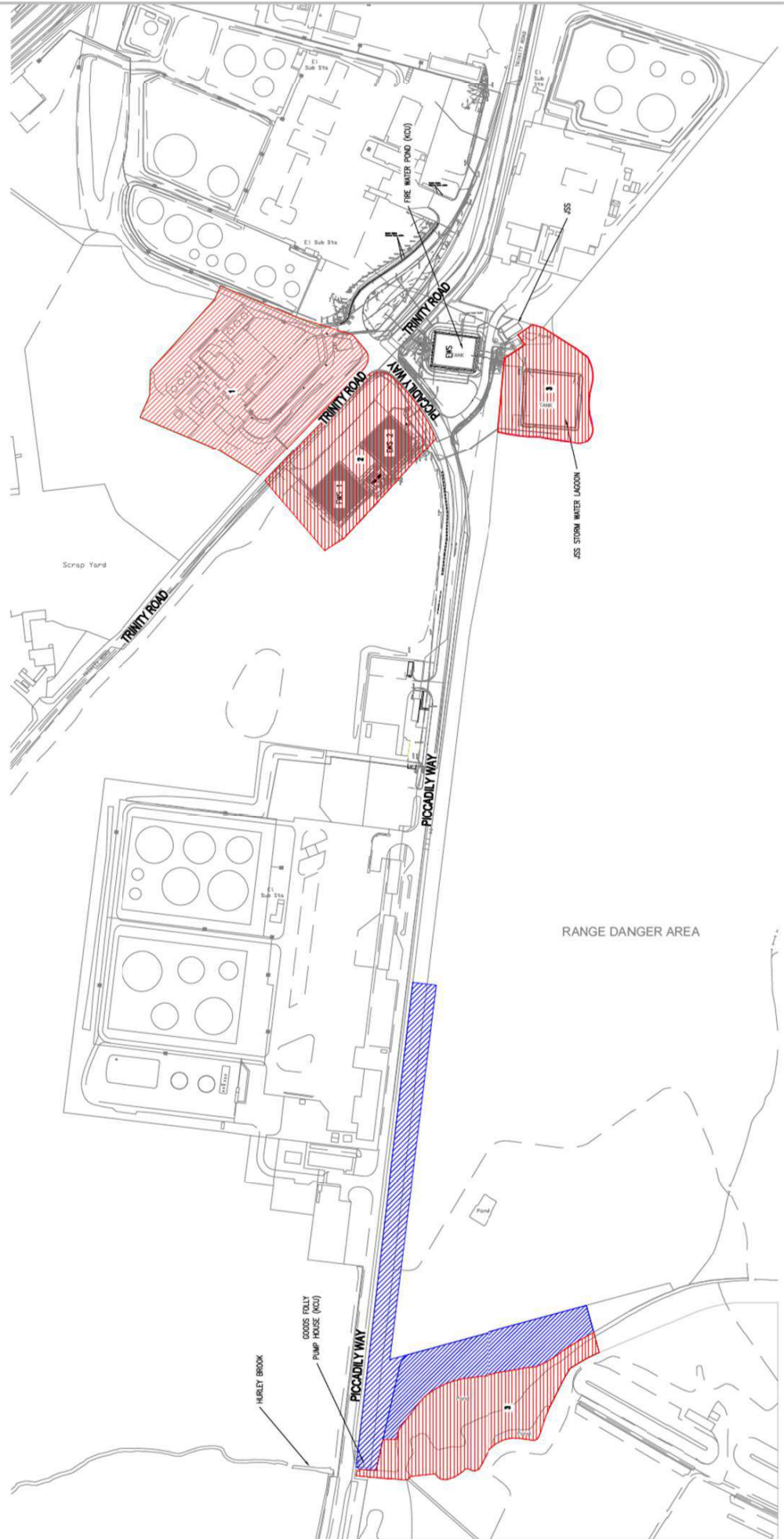
SCHEDULE 4

Plan of Buncefield (Site 1) ("**Site 1 Plan**")



SCHEDULE 5

Plan of Kingsbury (Site 2) ("**Site 2 Plan**")



Summary report: Litera Compare for Word 11.2.0.54 Document comparison done on 14/04/2022 14:21:12	
Style name: Default Style	
Intelligent Table Comparison: Active	
Original filename: Draft Order for Return Date Hearing (08.04.2022) - 103296915 1.DOCX	
Modified filename: draft order final.docx	
Changes:	
<u>Add</u>	58
Delete	34
Move From	0
<u>Move To</u>	0
<u>Table Insert</u>	0
Table Delete	0
<u>Table moves to</u>	0
Table moves from	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
Total Changes:	92

**SECTION D / Exhibits to Witness Statements for Return Date
Hearing on 20 April 2022**

IN THE HIGH COURT OF JUSTICE
BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES
CHANCERY DIVISION
PROPERTY TRUSTS AND PROBATE LIST

Claim No. [.....]

(1) UNITED KINGDOM OIL PIPELINES LIMITED

First Claimant / Applicant

(2) WEST LONDON PIPELINE AND STORAGE LIMITED

Second Claimant / Applicant

and

(1) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANTS AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN ON LAND AND BUILDINGS AT AND COMPRISING PART OF (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED RED ON THE ATTACHED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE (SHOWN FOR IDENTIFICATION SHADED RED ON THE ATTACHED SITE 2 PLAN)

First Defendant/Respondent

(2) PERSONS UNKNOWN WITHOUT THE CONSENT OF THE CLAIMANTS AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN INTERFERING WITH THE FIRST CLAIMANT'S RIGHTS TO PASS AND REPASS WITH OR WITHOUT VEHICLES, MATERIALS AND EQUIPMENT OVER PRIVATE ACCESS ROADS ADJACENT TO (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED BLUE ON THE ATTACHED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE (SHOWN FOR IDENTIFICATION SHADED BLUE ON THE ATTACHED SITE 2 PLAN)

Second Defendant/Respondent

EXHIBIT UKOP3

From: Owen Talfan Davies
Sent: 08 April 2022 06:27
To: xr-legal@riseup.net
Subject: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Dear Extinction Rebellion,

We act for (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited (the "**Claimants**").

The Claimants have issued an urgent application to the High Court of Justice to obtain an injunction to prevent the following activities by those carrying out direct action at Buncefield Oil Terminal, Hemel Hempstead, Hertfordshire and Kingsbury Oil Terminal, Kingsbury, Warwickshire (the "**Sites**"), namely:

- unlawful trespass on the Claimants' private land; and
- unlawful interference with rights of way enjoyed by the Claimants over private land.

The hearing of the Claimants' application is to be heard today at 10.30 a.m. in Court 14 of The Rolls Building, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL before Peter Knox QC sitting as a Judge of the Chancery Division.

The Claimants have not been able to identify the individuals who have trespassed on the Claimants' private land and/or interfered with the Claimants' rights of way over private land at the Sites, or who intend to do so, and we invite you to identify:

- any such individuals; and/or
- any individuals who are involved in direct action at the Sites.

Yours faithfully,

Owen Talfan Davies

Partner

D: +44 330 460 6961

M: +44 7711 088057

fieldfisher



From: Owen Talfan Davies
Sent: 08 April 2022 06:28
To: juststopoil@protonmail.co.uk
Subject: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Dear Just Stop Oil,

We act for (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited (the "**Claimants**").

The Claimants have issued an urgent application to the High Court of Justice to obtain an injunction to prevent the following activities by those carrying out direct action at Buncefield Oil Terminal, Hemel Hempstead, Hertfordshire and Kingsbury Oil Terminal, Kingsbury, Warwickshire (the "**Sites**"), namely:

- unlawful trespass on the Claimants' private land; and
- unlawful interference with rights of way enjoyed by the Claimants over private land.

The hearing of the Claimants' application is to be heard today at 10.30 a.m. in Court 14 of The Rolls Building, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL before Peter Knox QC sitting as a Judge of the Chancery Division.

The Claimants have not been able to identify the individuals who have trespassed on the Claimants' private land and/or interfered with the Claimants' rights of way over private land at the Sites, or who intend to do so, and we invite you to identify:

- any such individuals; and/or
- any individuals who are involved in direct action at the Sites.

Yours faithfully,

Owen Talfan Davies

Partner

D: +44 330 460 6961

M: +44 7711 088057

fieldfisher



Ella Haydon

From: Owen Talfan Davies
Sent: 08 April 2022 09:24
To: xr-legal@riseup.net
Subject: RE: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Dear Extinction Rebellion,

We refer to our email below in which we confirmed that the hearing of the Claimants' application is to be heard today at 10.30 a.m. in Court 14 of The Rolls Building, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL before Peter Knox QC sitting as a Judge of the Chancery Division. Please note that the hearing will now commence at the later time of 11.30 a.m., but will remain in Court 14 before Peter Knox QC sitting as a Judge of the Chancery Division.

Yours faithfully,

Owen Talfan Davies
Partner
D: +44 330 460 6961
M: +44 7711 088057

fieldfisher



From: Owen Talfan Davies <owen.talfan.davies@fieldfisher.com>
Sent: Friday, April 8, 2022 6:27 AM
To: xr-legal@riseup.net
Subject: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Dear Extinction Rebellion,

We act for (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited (the "**Claimants**").

The Claimants have issued an urgent application to the High Court of Justice to obtain an injunction to prevent the following activities by those carrying out direct action at Buncefield Oil Terminal, Hemel Hempstead, Hertfordshire and Kingsbury Oil Terminal, Kingsbury, Warwickshire (the "**Sites**"), namely:

- unlawful trespass on the Claimants' private land; and
- unlawful interference with rights of way enjoyed by the Claimants over private land.

The hearing of the Claimants' application is to be heard today at 10.30 a.m. in Court 14 of The Rolls Building, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL before Peter Knox QC sitting as a Judge of the Chancery Division.

The Claimants have not been able to identify the individuals who have trespassed on the Claimants' private land and/or interfered with the Claimants' rights of way over private land at the Sites, or who intend to do so, and we invite you to identify:

- any such individuals; and/or
- any individuals who are involved in direct action at the Sites.

Yours faithfully,

Owen Talfan Davies

Partner

D: +44 330 460 6961

M: +44 7711 088057

fieldfisher



Ella Haydon

From: Owen Talfan Davies
Sent: 08 April 2022 09:25
To: juststopoil@protonmail.co.uk
Subject: RE: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Dear Just Stop Oil,

We refer to our email below in which we confirmed that the hearing of the Claimants' application is to be heard today at 10.30 a.m. in Court 14 of The Rolls Building, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL before Peter Knox QC sitting as a Judge of the Chancery Division. Please note that the hearing will now commence at the later time of 11.30 a.m., but will remain in Court 14 before Peter Knox QC sitting as a Judge of the Chancery Division.

Yours faithfully,

Owen Talfan Davies
Partner
D: +44 330 460 6961
M: +44 7711 088057

fieldfisher



From: Owen Talfan Davies <owen.talfan.davies@fieldfisher.com>
Sent: Friday, April 8, 2022 6:28 AM
To: juststopoil@protonmail.co.uk
Subject: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Dear Just Stop Oil,

We act for (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited (the "**Claimants**").

The Claimants have issued an urgent application to the High Court of Justice to obtain an injunction to prevent the following activities by those carrying out direct action at Buncefield Oil Terminal, Hemel Hempstead, Hertfordshire and Kingsbury Oil Terminal, Kingsbury, Warwickshire (the "**Sites**"), namely:

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- any such individuals; and/or
- any individuals who are involved in direct action at the Sites.

Yours faithfully,

Owen Talfan Davies

Partner

D: +44 330 460 6961

M: +44 7711 088057

fieldfisher



IN THE HIGH COURT OF JUSTICE
BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES
CHANCERY DIVISION
PROPERTY TRUSTS AND PROBATE LIST

Claim No. PT-2022-000303

(1) UNITED KINGDOM OIL PIPELINES LIMITED

First Claimant / Applicant

(2) WEST LONDON PIPELINE AND STORAGE LIMITED

Second Claimant / Applicant

and

(1) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANT ON LAND AND BUILDINGS SHOWN SHADED RED ON THE PLANS ANNEXED TO THE CLAIM FORM

First Defendant/Respondent

(2) PERSONS UNKNOWN WITHOUT THE CONSENT OF THE CLAIMANT INTERFERING WITH THE FIRST CLAIMANT'S RIGHTS TO PASS AND REPASS WITH OR WITHOUT VEHICLES, MATERIALS AND EQUIPMENT OVER PRIVATE ACCESS ROADS ON LAND SHOWN SHADED BLUE ON THE PLANS ANNEXED TO THE CLAIM FORM

Second Defendant/Respondent

INDEX TO EXHIBIT "UKOP4"

No.	Document	Date	Pages
UKOP4			
1.	Second Witness Statement of Richard Thomas	13 April 2022	Tab19:UKOP4:8-25
2.	Images of the container on the perimeter of Site 1 containing the sealed Order	13 April 2022	Tab19:UKOP4:26-31
3.	First Witness Statement of Richard Thomas	13 April 2022	Tab19:UKOP4:32-47
4.	Images of the container on the perimeter of Site 2 containing the sealed Order	13 April 2022	Tab19:UKOP4:49

5.	Screenshot of web link https://ukop.azurewebsites.net hosting the Order and Court Documents	13 April 2022	Tab19:UKOP4:50
6.	Email from Claimants' solicitors to xr-legal@riseup.net timed 10.54am	13 April 2022	Tab19:UKOP4:51
7.	Email from Claimants' solicitors to juststopoil@protonmail.co.uk , juststopoil@protonmail.com and juststopoilpress@protonmail.com timed 10.58am	13 April 2022	Tab19:UKOP4:52
8.	Email from postmaster@fieldfisher.com to the Claimant's solicitors timed 6.36am	12 April 2022	Tab19:UKOP4:53
9.	Images of the container on the perimeter of Site 1 containing a note of hearing	13 April 2022	Tab19:UKOP4:54-57
10.	Images of the container on the perimeter of Site 2 containing a note of hearing	13 April 2022	Tab19:UKOP4:58

RICHARD THOMAS:
CLAIMANTS/APPLICANTS:
STATEMENT NO: 2
EXHIBITS: 'RT5-RT8'
DATED: 13/04/2022

IN THE HIGH COURT OF JUSTICE

Claim No. PT-2022-000303

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

CHANCERY DIVISION

PROPERTY TRUSTS AND PROBATE LIST

B E T W E E N

- (1) **UNITED KINGDOM OIL PIPELINES LIMITED**
(2) **WEST LONDON PIPELINE AND STORAGE LIMITED**

Claimants / Applicants

and

- (1) **PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT CONSENT, AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN, ON LAND AND BUILDINGS AT AND COMPRISING PART OF (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED RED ON THE ATTACHED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE**

First Defendants/Respondents

- (2) **PERSONS UNKNOWN WITHOUT CONSENT, AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN, OBSTRUCTING OR INTERFERING WITH THE FIRST CLAIMANT'S ACCESS OVER PRIVATE ACCESS ROADS ADJACENT TO (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED BLUE ON THE ATTACHED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE**

Second Defendants/Respondents

WITNESS STATEMENT OF PROCESS SERVER

I, Richard Thomas, Agent of I J Beim & Associates Limited of Suite 3, Chessington Business Centre, Cox Lane, Chessington, Surrey, KT9 1SD, Process Server and for the purpose of service

acting under the direction of Fieldfisher LLP of Riverbank House, 2 Swan Lane, London EC4R 3TT, Solicitors for the within named Claimants/Applicants in this matter, **STATE AS FOLLOWS:**

1. That I did on Tuesday 12 April 2022 between 3.05pm and 3.20pm serve the within named First and Second Defendants, Persons Unknown, with two bundles, each comprising of the following documents:-
 - i) Injunction Order issued herein on 8 April 2022;
 - ii) Sealed copy N1 Claim Form issued herein;
 - iii) Particulars of Claim appertaining to this matter;
 - iv) N9 standard Response Pack;
 - v) N244 sealed Application Notice for an Order for an Injunction to restrain trespass and unlawful interference on private land;
 - vi) N244 sealed Application Notice for an Order to continue the Interim Injunction granted by Peter Knox QC on 8 April 2022 sitting as a Judge of the Chancery Division to restrain trespass on and nuisance affecting the Claimants' land and for alternative methods of service;
 - vii) First Witness Statement of Daniel Owen Christopher Talfan Davies dated 8 April 2022;
 - viii) Bundle for hearing on 8 April 2022 including first Witness Statement of John Armstrong dated 7 April 2022 and first Witness statement of Peter Davies dated 7 April 2022;
 - ix) Draft Order against the First and Second Defendants.
2. That service of the above-mentioned documents was effected by leaving the same as two bundles enclosed in two separate transparent waterproof storage containers which I thereafter positioned at prominent points at the perimeter of the Claimants' Site no. 1 (referred to in these proceedings) and known as The Buncefield Oil Terminal, Hemel Hempstead, Hertfordshire in such a manner so as to come to the immediate attention of any persons attending thereat. More particularly, I can confirm that one of the storage containers was positioned by myself at the entrance to The Buncefield Oil Terminal located at the intersection of Oil Road with Green Lane, Hemel Hempstead whilst the second storage container was positioned at the entrance to the Claimants' premises forming part of The Buncefield Oil Terminal on the north side of Cherry Tree Lane, Hemel Hempstead. I can also confirm that I did further at the same time and place affix in a prominent position to the covering lid of both storage containers, a copy of the Claimant's laminated Notice of High Court Injunction Order dated 8th April 2022.
3. There is now produced and shown to me marked 'RT5' copy photographic images taken by myself on Tuesday 12 April 2022 and showing the two waterproof storage containers deposited at the entrance to the Claimants' premises at the intersection of Oil Road and Green Lane, Hemel Hempstead and Cherry Tree Lane, Hemel Hempstead as described herein.
4. That I did further immediately thereafter on Tuesday 12 April 2022 between 3.25pm and 4.35pm serve the within named First and Second Defendants with 40 copies of the Claimants' laminated Notice of High Court Injunction Order dated 8 April 2022, which I did by leaving the same either affixed to the perimeter fence or affixed to timber stakes which I positioned at prominent points directly adjacent to the perimeter fence surrounding various elements of the Claimants' Site no. 1, and known as The Buncefield Oil Terminal, Hemel Hempstead, Hertfordshire in such a manner so as to come to the immediate attention of any persons attending thereat.
5. There is now produced and shown to me marked 'RT6' a colour copy map extract of the Claimant's Site no. 1, known as The Buncefield Oil Terminal, Hemel Hempstead, Hertfordshire, within which I have indicated the approximate location of the 40 laminated Notices of High Court Injunction Order so served as described herein by myself on Tuesday 12 April 2022.

6. There is now produced and shown to me marked 'RT7' a series of colour photographic images taken by myself on Tuesday 12 April 2022 and showing a variety of the Claimants' laminated Notice of High Court Injunction Order so served as described herein on Tuesday 12 April 2022.
7. There is now produced and shown to me marked 'RT8' a further true copy of the Claimants' laminated Notice of High Court Injunction Order so served by myself as described herein on Tuesday 12 April 2022 at the Claimants' Site no. 1, known as The Buncefield Oil Terminal, Hemel Hempstead, Hertfordshire.

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.

Signed:


.....

RICHARD THOMAS

Dated:

13 April 2022

RICHARD THOMAS:
CLAIMANTS/APPLICANTS:
STATEMENT NO: 2
EXHIBITS: 'RT5-RT8'
DATED: 13/04/2022

IN THE HIGH COURT OF JUSTICE

Claim No. PT-2022-000303

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

CHANCERY DIVISION

PROPERTY TRUSTS AND PROBATE LIST

B E T W E E N

- (1) UNITED KINGDOM OIL PIPELINES LIMITED
(2) WEST LONDON PIPELINE AND STORAGE LIMITED

Claimants / Applicants

and

- (1) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT CONSENT, AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN, ON LAND AND BUILDINGS AT AND COMPRISING PART OF (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED RED ON THE ATTACHED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE

First Defendants/Respondents

- (2) PERSONS UNKNOWN WITHOUT CONSENT, AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN, OBSTRUCTING OR INTERFERING WITH THE FIRST CLAIMANT'S ACCESS OVER PRIVATE ACCESS ROADS ADJACENT TO (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED BLUE ON THE ATTACHED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE

Second Defendants/Respondents

THESE ARE THE COPY PHOTOGRAPHIC IMAGES REFERRED TO AS
EXHIBIT 'RT5' IN THE ANNEXED WITNESS STATEMENT OF RICHARD THOMAS



Signed:

RICHARD THOMAS

Dated:

13 April 2022

RICHARD THOMAS:
CLAIMANTS/APPLICANTS:
STATEMENT NO: 2
EXHIBITS: 'RT5-RT8'
DATED: 13/04/2022

IN THE HIGH COURT OF JUSTICE

Claim No. PT-2022-000303

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

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Claimants / Applicants

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First Defendants/Respondents

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Second Defendants/Respondents

**THIS IS THE COPY MAP EXTRACT REFERRED TO AS
EXHIBIT 'RT6' IN THE ANNEXED WITNESS STATEMENT
OF RICHARD THOMAS**

Signed:


.....

RICHARD THOMAS

Dated:

13 April 2022



Issue:	Date:
Revision:	
Revised by:	Checked by:
Issued by:	Approved by:
Revision:	Issued for information
Revised by: RWJ	Checked by: ETJ
Approved by: PJ	
Project No: 500000	Scale: 1/250

Do not scale this print.
All work to be carried out in accordance with
contract specification.

**Project
Asset Plans
Buncefield**

A3 Drawing No.
500000-D-MAP-0003

Rev. 1

5-7 Alexandra Road
Hemel Hempstead
Herts HP2 5SS
United Kingdom

Tel: 44 (0)1442 24220
Fax: 44 (0)1442 21400
business@opa.co.uk
www.opa.co.uk

RICHARD THOMAS:
CLAIMANTS/APPLICANTS:
STATEMENT NO: 2
EXHIBITS: 'RT5-RT8'
DATED: 13/04/2022

IN THE HIGH COURT OF JUSTICE

Claim No. PT-2022-000303

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

CHANCERY DIVISION

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- (1) UNITED KINGDOM OIL PIPELINES LIMITED**
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Claimants / Applicants

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Second Defendants/Respondents

**THESE ARE THE PHOTOGRAPHIC IMAGES REFERRED TO AS
EXHIBIT 'RT7' IN THE ANNEXED WITNESS STATEMENT
OF RICHARD THOMAS**

Signed:


.....

RICHARD THOMAS

Dated:

13 April 2022



These are a continuation of the photographic images referred to as exhibit 'RT7' in the annexed witness statement of Richard Thomas



These are a continuation of the photographic images referred to as exhibit 'RT7' in the annexed witness statement of Richard Thomas



These are a continuation of the photographic images referred to as exhibit 'RT7' in the annexed witness statement of Richard Thomas



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RICHARD THOMAS:
CLAIMANTS/APPLICANTS:
STATEMENT NO: 2
EXHIBITS: 'RT5-RT8'
DATED: 13/04/2022

IN THE HIGH COURT OF JUSTICE

Claim No. PT-2022-000303

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

CHANCERY DIVISION

PROPERTY TRUSTS AND PROBATE LIST

B E T W E E N

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First Defendants/Respondents

- (2) PERSONS UNKNOWN WITHOUT CONSENT, AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN, OBSTRUCTING OR INTERFERING WITH THE FIRST CLAIMANT'S ACCESS OVER PRIVATE ACCESS ROADS ADJACENT TO (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED BLUE ON THE ATTACHED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE

Second Defendants/Respondents

**THIS IS THE COPY NOTICE OF HIGH COURT INJUNCTION ORDER
REFERRED TO AS
EXHIBIT 'RT8' IN THE ANNEXED WITNESS STATEMENT
OF RICHARD THOMAS**

Signed:

.....

RICHARD THOMAS

Dated:

13 April 2022

HIGH COURT CLAIM NO: PT – 2022 - 000303

HIGH COURT INJUNCTION IN FORCE

NOTICE OF HIGH COURT ORDER DATED 8 April 2022

TO: PERSONS UNKNOWN ACTING IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN AND/OR THE JUST STOP OIL CAMPAIGN AND AS MORE PARTICULARLY DEFINED IN AND DESCRIBED AS THE FIRST DEFENDANT OR THE SECOND DEFENDANT IN THE ORDER (THE "DEFENDANTS")

FROM: (1) UNITED KINGDOM OIL PIPELINES LIMITED AND (2) WEST LONDON PIPELINE AND STORAGE LIMITED (THE "CLAIMANTS")

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

IT IS ORDERED THAT, UNTIL THE DETERMINATION OF A FURTHER HEARING ON 20 APRIL 2022 (THE "RETURN DATE"), THIS INJUNCTION PROHIBITS THE DEFENDANTS FROM:

- ENTERING OR REMAINING UPON THE LAND SHADED RED ON THE PLAN SET OUT IN THIS NOTICE (THE "PLAN") OR FROM CAUSING DAMAGE TO, OR REMOVING EQUIPMENT FROM THE LAND SHADED RED ON THE PLAN WITHOUT THE CONSENT OF THE CLAIMANTS; AND
- OBSTRUCTING OR OTHERWISE INTERFERING WITH THE FIRST CLAIMANT'S ACCESS OVER THE PRIVATE ACCESS ROAD (SHADED BLUE) AND WHICH ADJOINS THE LAND SHADED RED, FOR ACCESS AND EGRESS BETWEEN THE LAND SHADED RED AND THE PUBLIC HIGHWAY.

THIS MEANS THAT YOU MUST NOT GO BEYOND THIS NOTICE AND ENTER THIS SITE WITHOUT PERMISSION. THIS ALSO MEANS THAT YOU MUST NOT OBSTRUCT OR OTHERWISE INTERFERE WITH THE FIRST CLAIMANT'S ACCESS OVER THE ACCESS ROAD SHADED BLUE. IF YOU DO, YOU MAY BE SENT TO PRISON OR HAVE YOUR ASSETS SEIZED.

REFERENCES TO THE "CLAIMANT" OR "CLAIMANTS" IN THIS ORDER MEANS ONE OR MORE OF THE AFOREMENTIONED CLAIMANTS AND EACH OF ITS AND THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, EMPLOYEES, PARTNERS, CONSULTANTS AND OTHER VISITORS.

Copies of the Court Order and other documents in the proceedings may be viewed at: <https://ukop.azurewebsites.net>

The Order will be further considered on the Return Date.

Claimants' solicitors: Fieldfisher LLP whose address is Riverbank House, 2 Swan Lane, London EC4R 3TT (Telephone number: 0207 861 4000; email address: UKOPinjunction@fieldfisher.com)

The Claimants will make available to any person (who has provided their name(s), address(es) and proof of identity to the Claimants' solicitors) upon written application to the Claimants' solicitors (either in writing at their said offices or by email to UKOPinjunction@fieldfisher.com) and in either case quoting reference OTD/UKOP), using an online file hosting service, the Court documents, witness evidence and exhibits, as soon as possible thereafter and in either case within one clear working day from the first working day on which such written application is received.

Court communications: all communications about this Order should be sent to the Court Manager, High Court of Justice (details found at <https://www.find-court-tribunal.service.gov.uk/courts/rolis-building-business-and-property-courts-of-england-wales>)



The freehold land at:

- Land and buildings on the south side of Cherry Tree Lane, Hemel Hempstead which is registered at the Land Registry under title number HD485114 and marked 1 on the plan above;
- Land to the north of Cherry Tree Lane, Hemel Hempstead which is registered at the Land Registry under title number HD485115 and marked 2 on the plan above;
- Land on the west side of Bunocfield Lane, Hemel Hempstead which is registered at the Land Registry under title number HD485116 and marked 3 on the plan above;
- Land on the north east and south west side of Three Cherry Trees Lane, Hemel Hempstead registered at the Land Registry under title number HD485118 and marked 5 on the plan above

The leasehold land at:

- land on the north side of Cherry Tree Lane, Hemel Hempstead, as more particularly described by a lease dated 23 September 2013 made between (1) Total UK Limited and (2) United Oil Kingdom Pipelines Limited which is registered at the Land Registry under title number HD529733 and marked 4 on the plan above

Site 1: East entrance to Oil Road – 6.56am on 13 April 2022



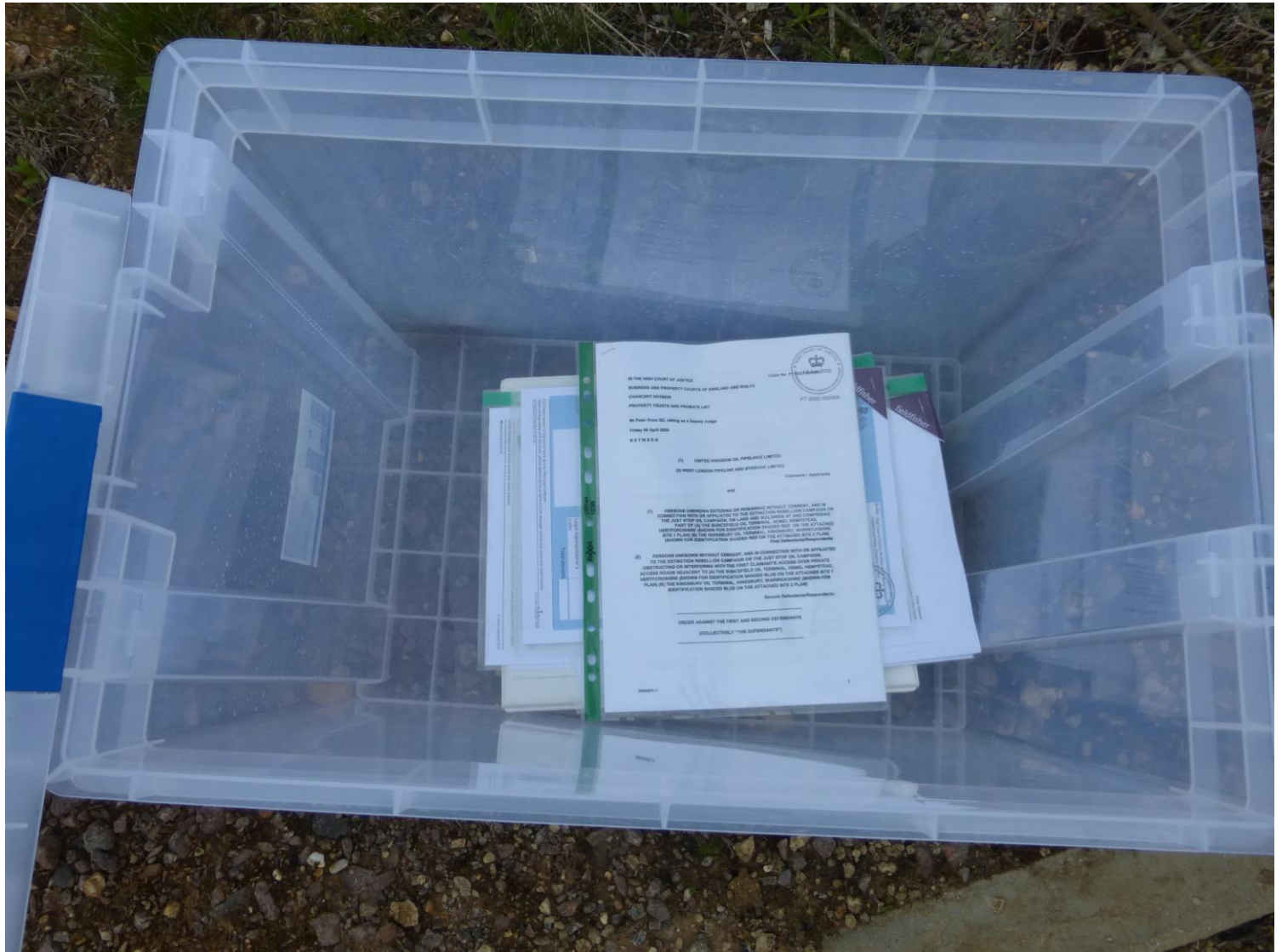
Site 1: East Entrance to Oil Road - 6.56am on 13 April 2022



Site 1: East entrance to Oil Road - 6.56am on 13 April 2022



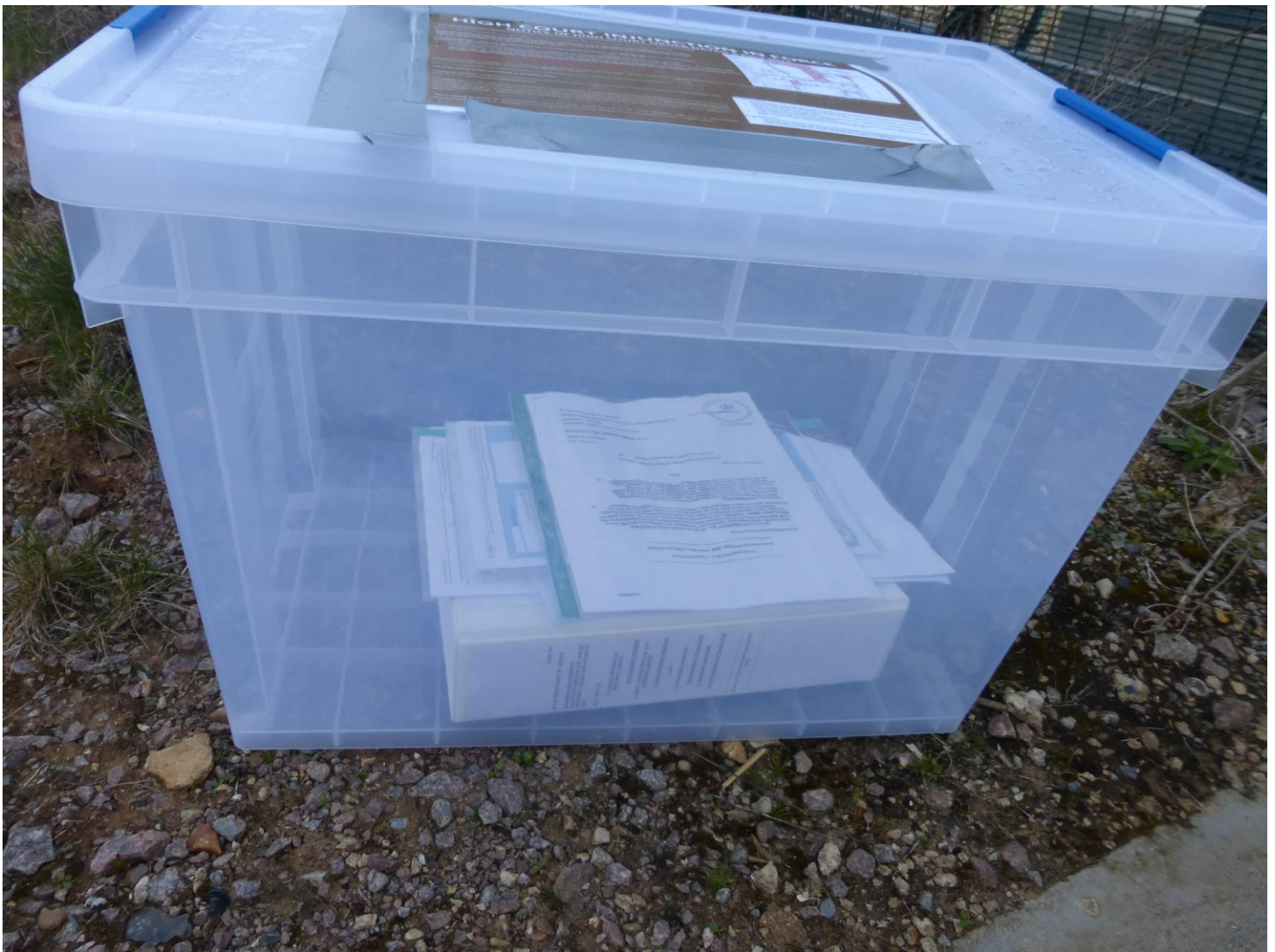
Site 1: Main entrance to Cherry Tree Farm – 7.12am on 13 April 2022



Site 1: Main Entrance to Cherry Tree Farm – 7.12am on 13 April 2022



Site 1: Main Entrance to Cherry Tree Farm – 7.12am on 13 April 2022



RICHARD THOMAS:
CLAIMANTS/APPLICANTS:
STATEMENT NO: 1
EXHIBITS: 'RT1-RT4'
DATED: 13/04/2022

IN THE HIGH COURT OF JUSTICE

Claim No. PT-2022-000303

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

CHANCERY DIVISION

PROPERTY TRUSTS AND PROBATE LIST

B E T W E E N

(1) UNITED KINGDOM OIL PIPELINES LIMITED

(2) WEST LONDON PIPELINE AND STORAGE LIMITED

Claimants / Applicants

and

(1) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT CONSENT, AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN, ON LAND AND BUILDINGS AT AND COMPRISING PART OF (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED RED ON THE ATTACHED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE

First Defendants/Respondents

(2) PERSONS UNKNOWN WITHOUT CONSENT, AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN, OBSTRUCTING OR INTERFERING WITH THE FIRST CLAIMANT'S ACCESS OVER PRIVATE ACCESS ROADS ADJACENT TO (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED BLUE ON THE ATTACHED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE

Second Defendants/Respondents

WITNESS STATEMENT OF PROCESS SERVER

I, Richard Thomas, Agent of I J Beim & Associates Limited of Suite 3, Chessington Business Centre, Cox Lane, Chessington, Surrey, KT9 1SD, Process Server and for the purpose of service acting under the direction of Fieldfisher LLP of Riverbank House, 2 Swan Lane, London EC4R 3TT, Solicitors for the within named Claimants/Applicants in this matter, **STATE AS FOLLOWS:**


1. That I did on Tuesday 12 April 2022 between 11.20am and 11.30am serve the within named First and Second Defendants, Persons Unknown, with two bundles, each comprising of the following documents:-
 - i) Injunction Order issued herein on 8 April 2022;
 - ii) Sealed copy N1 Claim Form issued herein;
 - iii) Particulars of Claim appertaining to this matter;
 - iv) N9 standard Response Pack;
 - v) N244 sealed Application Notice for an Order for an Injunction to restrain trespass and unlawful interference on private land;
 - vi) N244 sealed Application Notice for an Order to continue the Interim Injunction granted by Peter Knox QC on 8 April 2022 sitting as a Judge of the Chancery Division to restrain trespass on and nuisance affecting the Claimants' land and for alternative methods of service;
 - vii) First Witness Statement of Daniel Owen Christopher Talfan Davies dated 8 April 2022;
 - viii) Bundle for hearing on 8 April 2022 including first Witness Statement of John Armstrong dated 7 April 2022 and first Witness statement of Peter Davies dated 7 April 2022;
 - ix) Draft order against the First and Second Defendants.
2. That service of the above-mentioned documents was effected by leaving the same as two bundles enclosed in two separate transparent waterproof storage containers, which I thereafter deposited both directly at and immediately adjacent to, the entrance to the Claimants' Site 2 (referred to in these proceedings) and known as The Kingsbury Oil Terminal, Kingsbury, Warwickshire. For precise information purposes I can confirm that the entrance to the site is located at the intersection of Trinity Road with Piccadilly Way, Kingsbury, Warwickshire. I can also confirm that I did further at the same time and place affix to the covering lid of both storage containers, a laminated copy of the Claimants' Notice of High Court Order dated 8 April 2022.
3. That both of the storage containers so served as described above were positioned in such a manner so as to come to the immediate attention of any persons attending thereat.
4. There is now produced and shown to me marked 'RT1' photographic images taken by myself on Tuesday 12 April 2022 and showing the above-mentioned storage containers so served as described herein at the entrance to the Claimants' Site 2 and known as The Kingsbury Oil Terminal, Kingsbury, Warwickshire.
5. That I did further immediately thereafter on Tuesday 12 April 2022 between 11.35am and 12.50pm serve the within named First and Second Defendants with 40 copies of the Claimants' laminated Notice of High Court Injunction Order dated 8 April 2022, which I did by leaving the same either affixed to the perimeter fence or affixed to timber stakes which I positioned at prominent points directly adjacent to the perimeter fence surrounding various elements of the Claimants' Site 2, known as The Kingsbury Oil Terminal, Kingsbury, Warwickshire in such a manner so as to come to the immediate attention of any persons attending thereat.
6. There is now produced and shown to me marked 'RT2' a colour copy map extract of the Claimant's Site 2, known as The Kingsbury Oil Terminal, within which I have indicated the approximate location of the 40 laminated Notices of High Court Injunction Order so served as described herein by myself on Tuesday 12 April 2022.
7. There is now produced and shown to me marked 'RT3' a series of colour photographic images taken by myself on Tuesday 12 April 2022 and showing a variety of the Claimants' laminated Notices so served as described herein on Tuesday 12 April 2022.

8. There is now produced and shown to me marked 'RT4' a further true copy of the Claimants' laminated Notice of High Court Injunction Order so served by myself as described herein on Tuesday 12 April 2022 at the Claimants' Site 2, known as The Kingsbury Oil Terminal, Kingsbury, Warwickshire.

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.

Signed:


.....

RICHARD THOMAS

Dated:

13 April 2022

RICHARD THOMAS:
CLAIMANTS/APPLICANTS:
STATEMENT NO: 1
EXHIBITS: 'RT1-RT4'
DATED: 13/04/2022

IN THE HIGH COURT OF JUSTICE

Claim No. PT-2022-000303

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

CHANCERY DIVISION

PROPERTY TRUSTS AND PROBATE LIST

B E T W E E N

(1) UNITED KINGDOM OIL PIPELINES LIMITED

(2) WEST LONDON PIPELINE AND STORAGE LIMITED

Claimants / Applicants

and

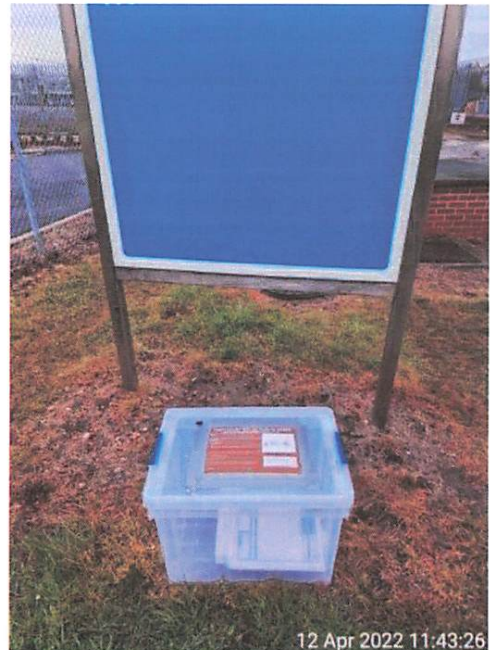
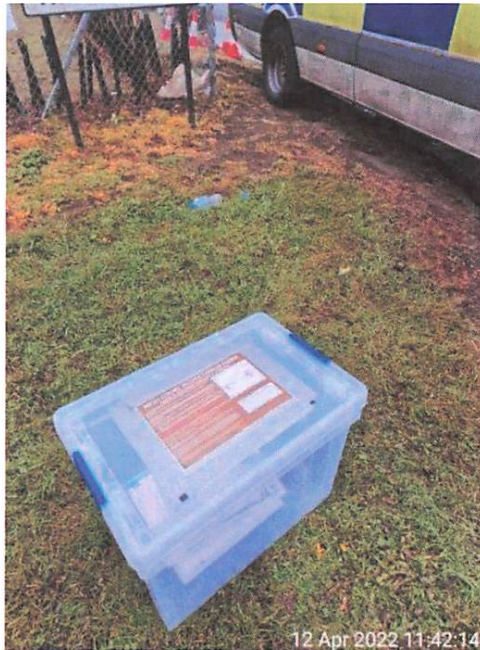
(1) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT CONSENT, AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN, ON LAND AND BUILDINGS AT AND COMPRISING PART OF (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED RED ON THE ATTACHED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE

First Defendants/Respondents

(2) PERSONS UNKNOWN WITHOUT CONSENT, AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN, OBSTRUCTING OR INTERFERING WITH THE FIRST CLAIMANT'S ACCESS OVER PRIVATE ACCESS ROADS ADJACENT TO (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED BLUE ON THE ATTACHED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE

Second Defendants/Respondents

THESE ARE THE COPY PHOTOGRAPHIC IMAGES REFERRED TO AS
EXHIBIT 'RT1' IN THE ANNEXED WITNESS STATEMENT
OF RICHARD THOMAS



Signed:
RICHARD THOMAS

Dated: 13 April 2022

RICHARD THOMAS:
CLAIMANTS/APPLICANTS:
STATEMENT NO: 1

IN THE HIGH COURT OF JUSTICE

Claim No. PT-2022-000303

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

CHANCERY DIVISION

PROPERTY TRUSTS AND PROBATE LIST

B E T W E E N

(1) UNITED KINGDOM OIL PIPELINES LIMITED

(2) WEST LONDON PIPELINE AND STORAGE LIMITED

Claimants / Applicants

and

(1) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT CONSENT, AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN, ON LAND AND BUILDINGS AT AND COMPRISING PART OF (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED RED ON THE ATTACHED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE

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Second Defendants/Respondents

**THIS IS THE COPY MAP EXTRACT REFERRED TO AS
EXHIBIT 'RT2' IN THE ANNEXED WITNESS STATEMENT
OF RICHARD THOMAS**

Signed:


.....

RICHARD THOMAS

Dated:

13 April 2022



RICHARD THOMAS:
CLAIMANTS/APPLICANTS:
STATEMENT NO: 1
EXHIBITS: 'RT1-RT4'
DATED: 13/04/2022

IN THE HIGH COURT OF JUSTICE

Claim No. PT-2022-000303

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

CHANCERY DIVISION

PROPERTY TRUSTS AND PROBATE LIST

B E T W E E N

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(2) WEST LONDON PIPELINE AND STORAGE LIMITED

Claimants / Applicants

and

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Second Defendants/Respondents

**THESE ARE THE PHOTOGRAPHIC IMAGES REFERRED TO AS
EXHIBIT 'RT3' IN THE ANNEXED WITNESS STATEMENT
OF RICHARD THOMAS**

Signed:


.....

RICHARD THOMAS

Dated:

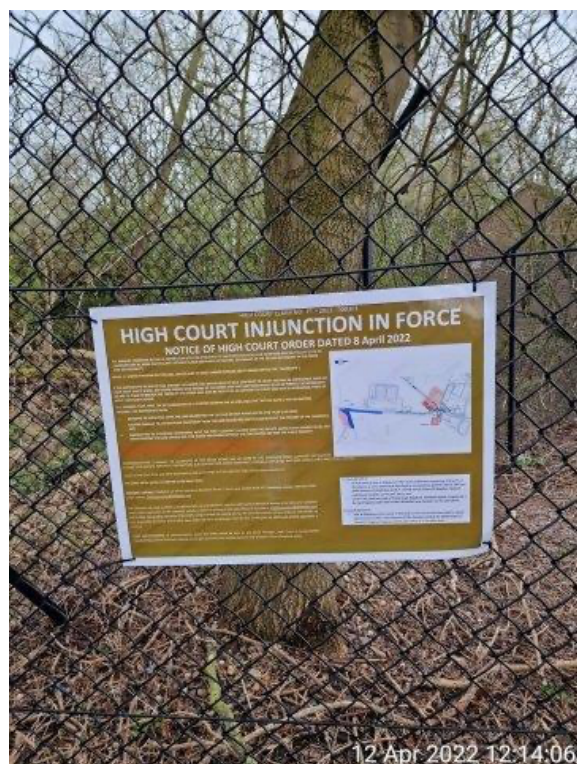
13 April 2022



These are a continuation of the photographic images referred to as exhibit 'RT3' in the annexed witness statement of Richard Thomas



These are a continuation of the photographic images referred to as exhibit 'RT3' in the annexed witness statement of Richard Thomas



These are a continuation of the photographic images referred to as exhibit 'RT3' in the annexed witness statement of Richard Thomas



RICHARD THOMAS:
CLAIMANTS/APPLICANTS:
STATEMENT NO: 1
EXHIBITS: 'RT1-RT4'
DATED: 13/04/2022

IN THE HIGH COURT OF JUSTICE

Claim No. PT-2022-000303

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

CHANCERY DIVISION

PROPERTY TRUSTS AND PROBATE LIST

B E T W E E N

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(2) WEST LONDON PIPELINE AND STORAGE LIMITED

Claimants / Applicants

and

(1) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT CONSENT, AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN, ON LAND AND BUILDINGS AT AND COMPRISING PART OF (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED RED ON THE ATTACHED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE

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Second Defendants/Respondents

**THIS IS THE COPY NOTICE OF HIGH COURT INJUNCTION ORDER
REFERRED TO AS
EXHIBIT 'RT4' IN THE ANNEXED WITNESS STATEMENT
OF RICHARD THOMAS**

Signed:


.....

RICHARD THOMAS

Dated:

13 April 2022

HIGH COURT INJUNCTION IN FORCE

NOTICE OF HIGH COURT ORDER DATED 8 April 2022

TO: PERSONS UNKNOWN ACTING IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN AND/OR THE JUST STOP OIL CAMPAIGN AND AS MORE PARTICULARLY DEFINED IN AND DESCRIBED AS THE FIRST DEFENDANT OR THE SECOND DEFENDANT IN THE ORDER (THE DEFENDANTS)

FROM: (1) UNITED KINGDOM OIL PIPELINES LIMITED AND (2) WEST LONDON PIPELINE AND STORAGE LIMITED (THE "CLAIMANTS")

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

IT IS ORDERED THAT, UNTIL THE DETERMINATION OF A FURTHER HEARING ON 20 APRIL 2022 (THE "RETURN DATE"), THIS INJUNCTION PROHIBITS THE DEFENDANTS FROM:

- ENTERING OR REMAINING UPON THE LAND SHADED RED ON THE PLAN SET OUT IN THIS NOTICE (THE "PLAN") OR FROM CAUSING DAMAGE TO, OR REMOVING EQUIPMENT FROM THE LAND SHADED RED ON THE PLAN WITHOUT THE CONSENT OF THE CLAIMANTS; AND
- OBSTRUCTING OR OTHERWISE INTERFERING WITH THE FIRST CLAIMANT'S ACCESS OVER THE PRIVATE ACCESS ROAD (SHADED BLUE) AND WHICH ADJOINS THE LAND SHADED RED, FOR ACCESS AND EGRESS BETWEEN THE LAND SHADED RED AND THE PUBLIC HIGHWAY.

THIS MEANS THAT YOU MUST NOT GO BEYOND THIS NOTICE AND ENTER THIS SITE WITHOUT PERMISSION. THIS ALSO MEANS THAT YOU MUST NOT OBSTRUCT OR OTHERWISE INTERFERE WITH THE FIRST CLAIMANT'S ACCESS OVER THE ACCESS ROAD SHADED BLUE. IF YOU DO, YOU MAY BE SENT TO PRISON OR HAVE YOUR ASSETS SEIZED.

REFERENCES TO THE 'CLAIMANT' OR 'CLAIMANTS' IN THIS ORDER MEANS ONE OR MORE OF THE AFOREMENTIONED CLAIMANTS AND EACH OF ITS AND THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, EMPLOYEES, PARTNERS, CONSULTANTS AND OTHER VISITORS.

Copies of the Court Order and other documents in the proceedings may be viewed at: <https://ukop.azurewebsites.net>

The Order will be further considered on the Return Date.

Claimants' solicitors: Fieldfisher LLP whose address is Riverbank House, 2 Swan Lane, London EC4R 3TT (Telephone number: 0207 861 4000; email address: UKOPinjunction@fieldfisher.com)

The Claimants will make available to any person (who has provided their name(s), address(es) and proof of identity to the Claimants' solicitors) upon written application to the Claimants' solicitors (either in writing at their said offices or by email to UKOPinjunction@fieldfisher.com) and in either case quoting reference OTD/UKOP), using an online file hosting service, the Court documents, witness evidence and exhibits, as soon as possible thereafter and in either case within one clear working day from the first working day on which such written application is received.

Court communications: all communications about this Order should be sent to the Court Manager, High Court of Justice (details found at <https://www.find-court-tribunal-service.gov.uk/courts/rois-building-business-and-property-courts-of-england-wales>)



The freehold land at:

- All that piece of land at Kingsbury in the County of Warwick comprising 4.96 acres or thereabouts as more particularly described by a conveyance dated 31 March 1967 and made between (1) Shell-Mex and B.P. Limited and (2) United Oil Kingdom Pipelines Limited and marked 1 on the plan above; and
- Land on the south-east side of Trinity Road, Kingsbury, Tamworth which is registered at the Land Registry under title number WK458465 and marked 2 on the plan above;

The leasehold land at:

- land at Kingsbury in the County of Warwick, as more particularly described in a lease dated 11 March 2021 made between (1) The Secretary of State for Defence and (2) United Oil Kingdom Pipelines Limited and marked 3 on the plan above.

Site 2: 9.00am on 13 April 2022



4/13/2022 10:01 AM	270368	(2022.04.08) Final Note from Injunction Hearing dated 08 April 2022 - 103362492_1.PDF
4/8/2022 8:44 PM	83721602	Bundle for Interim Injunction Hearing on 8 April 2022 - 103273893_1.pdf
4/8/2022 8:45 PM	887760	Defendant Response Pack - 103297040_1.pdf
4/8/2022 8:28 PM	1061012	Draft Order for Return Date Hearing.(08.04.2022)- 103296915_1.DOCX
4/8/2022 8:28 PM	4712019	First Witness Statement of Daniel Owen Christopher Talfan Davies dated 8 April 2022 together with Exhibit UKOP3 - 103279742_1.PDF
4/8/2022 8:28 PM	991217	PT-2022-000303 - Application Notice for Interim Injunction Hearing dated 7 April 2022 - 103296911_1.PDF
4/11/2022 4:10 PM	127841	PT-2022-000303 - Sealed Application Notice - Return Date - 08.04.2022 - 103313587_1.PDF
4/11/2022 4:10 PM	1141844	PT-2022-000303 - Sealed Claim Form - without rider - 11.04.2022 - 103313439_1.PDF
4/12/2022 11:38 AM	3631509	Sealed Order dated 8 April 2022 in relation to interim injunction hearing - 103338343_1.PDF
4/13/2022 9:45 AM	152	web.config

Fiona Sellers

From: Owen Talfan Davies
Sent: 13 April 2022 10:54
To: xr-legal@riseup.net
Cc: UKOP injunction
Subject: RE: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Dear Extinction Rebellion,

We refer to our emails of 8 April 2022, set out below, in which we confirmed that we acted for (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited (the "**Claimants**") in respect of an application for injunctive relief which was to be heard on 8 April 2022 in Court 14 of The Rolls Building, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL before Peter Knox QC sitting as a Judge of the Chancery Division (the "**Hearing**").

At the Hearing, the Court granted an order in favour of the Claimants which provides for pre-emptive injunctive relief against unlawful acts targeted at two sites held by the Claimants (the "**Order**"). A copy of the Order and the Court Documents (comprising the Claim Form, the Particulars of Claim, the Response Pack, the Application Notice dated 7 April 2022, the First Witness Statement of John Armstrong dated 7 April 2022, the First Witness Statement of Peter Davis dated 7 April 2022, the First Witness Statement of Daniel Owen Christopher Talfan Davies dated 8 April 2022, an Application Notice in respect of the Return Date and a Solicitor's Note of the Hearing) may be viewed at the following weblink:

<https://ukop.azurewebsites.net>

The Order will be considered further at the return date hearing (the "**Return Date**"). The Return Date has been fixed for 20 April 2022 with a time estimate of 3 hours. The matter has been reserved to Mr Peter Knox QC sitting as a Deputy Judge (without prejudice to any application by any Defendant that another judge hear the matter). Details of the start time for the Return Date and the Court Room in which the Return Date will be heard will be provided to you once known to the Claimants.

The Order grants permission for the Claimants to file and serve any further evidence by 4.30pm on Thursday, 14 April 2022. We confirm that it is the intention of the Claimants to file and serve further evidence. Accordingly, copies of that evidence will be made available at the weblink referred to above on **Thursday, 14 April 2022**.

The Order also grants permission for any individual who wishes to come forward to defend the proceedings to file and serve any evidence **by 4.30pm on Tuesday, 19 April 2022**. We are authorised to accept service for and on behalf of the Claimants and confirm that service of any evidence can be affected by emailing the relevant documents to the following email address:

UKOPinjunction@fieldfisher.com

The Claimants will prepare a bundle for use at the Return Date which contains the Court Documents together with the further evidence relied upon by the Claimants. The bundle will be made available at the weblink referred to above on **Thursday, 14 April 2022**.

Yours faithfully,

Owen Talfan Davies
Partner
D: +44 330 460 6961

Fiona Sellers

From: Owen Talfan Davies
Sent: 13 April 2022 10:58
To: juststopoil@protonmail.co.uk; juststopoil@protonmail.com;
juststopoilpress@protonmail.com
Subject: RE: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Dear Just Stop Oil,

We refer to our emails of 8 April 2022, set out below, in which we confirmed that we acted for (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited (the "**Claimants**") in respect of an application for injunctive relief which was to be heard on 8 April 2022 in Court 14 of The Rolls Building, 7 Rolls Buildings, Fetter Lane, London EC4A 1NL before Peter Knox QC sitting as a Judge of the Chancery Division (the "**Hearing**").

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The Order will be considered further at the return date hearing (the "**Return Date**"). The Return Date has been fixed for 20 April 2022 with a time estimate of 3 hours. The matter has been reserved to Mr Peter Knox QC sitting as a Deputy Judge (without prejudice to any application by any Defendant that another judge hear the matter). Details of the start time for the Return Date and the Court Room in which the Return Date will be heard will be provided to you once known to the Claimants.

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UKOPinjunction@fieldfisher.com

The Claimants will prepare a bundle for use at the Return Date which contains the Court Documents together with the further evidence relied upon by the Claimants. The bundle will be made available at the weblink referred to above on **Thursday, 14 April 2022**.

Yours faithfully,

From: Owen Talfan Davies <owen.talfan.davies@fieldfisher.com>
Sent: Friday, April 8, 2022 9:25 AM
To: juststopoil@protonmail.co.uk

Subject: RE: Your message couldn't be delivered

From: Domain postMaster address <postmaster@fieldfisher.com>

Date: 12 April 2022 at 06:36:25 BST

To: Owen Talfan Davies <owen.talfan.davies@fieldfisher.com>

Subject: Your message couldn't be delivered

The logo for Mimecast, featuring the word "mimecast" in a white, lowercase, sans-serif font on a dark blue rectangular background.

Your message couldn't be delivered

The message you sent to juststopoil@protonmail.co.uk couldn't be delivered due to:
Recipient server unavailable or busy.

Further information

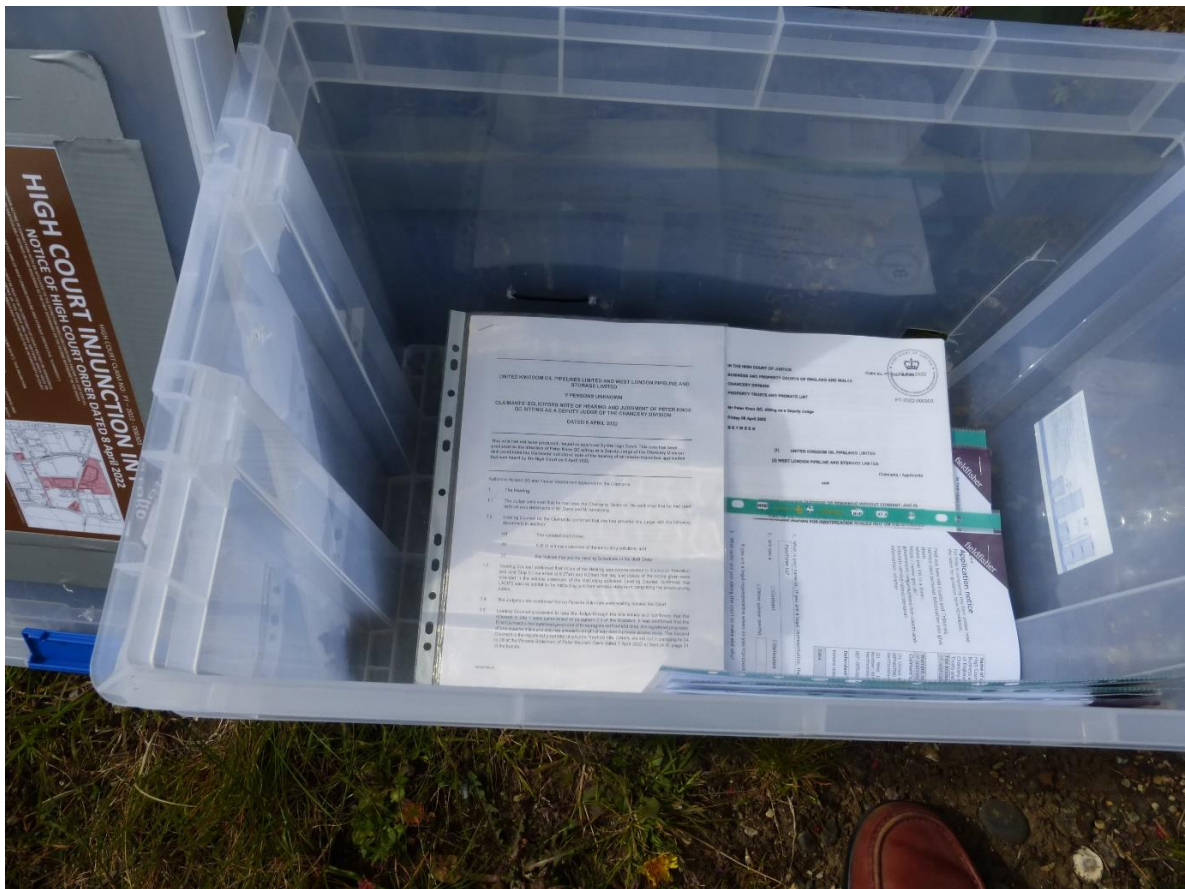
Connection timed out (Connection timed out)

If you sent this message to multiple addresses, you'll receive a notification like this for every one that didn't arrive.

Powered by The logo for Mimecast, featuring the word "mimecast" in a white, lowercase, sans-serif font on a dark blue rectangular background.

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Site 1: East entrance to Oil Road – 11.58am on 13 April 2022



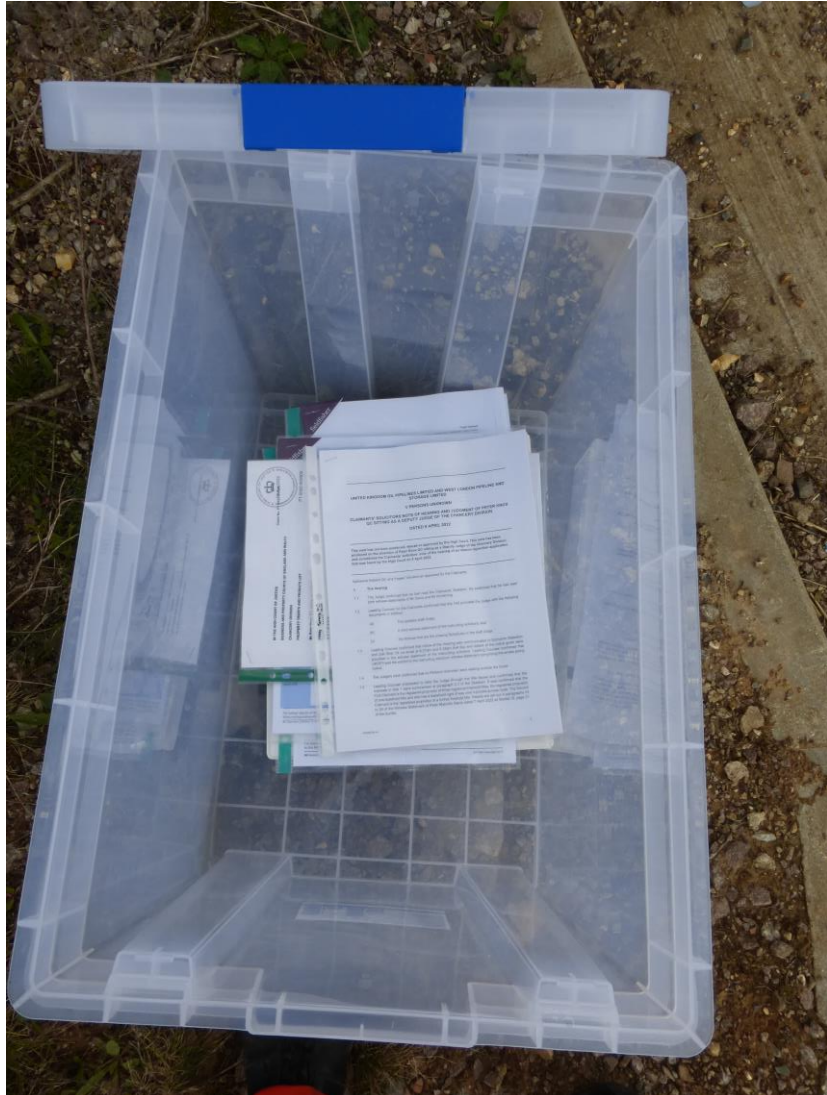
Site 1: East entrance to Oil Road – 11.58am on 13 April 2022



Site 1: Main entrance to Cherry Tree Farm – 12.30pm on 13 April 2022



Site 1: Main entrance to Cherry Tree Farm – 12.30pm on 13 April 2022



Site 2: 1.00pm on 13 April 2022



IN THE HIGH COURT OF JUSTICE
BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES
CHANCERY DIVISION
PROPERTY TRUSTS AND PROBATE LIST

Claim No. PT-2022-000303

(1) UNITED KINGDOM OIL PIPELINES LIMITED

First Claimant / Applicant

(2) WEST LONDON PIPELINE AND STORAGE LIMITED

Second Claimant / Applicant

and

(1) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT THE CONSENT OF THE CLAIMANT ON LAND AND BUILDINGS SHOWN SHADED RED ON THE PLANS ANNEXED TO THE CLAIM FORM

First Defendant/Respondent

(2) PERSONS UNKNOWN WITHOUT THE CONSENT OF THE CLAIMANT INTERFERING WITH THE FIRST CLAIMANT'S RIGHTS TO PASS AND REPASS WITH OR WITHOUT VEHICLES, MATERIALS AND EQUIPMENT OVER PRIVATE ACCESS ROADS ON LAND SHOWN SHADED BLUE ON THE PLANS ANNEXED TO THE CLAIM FORM

Second Defendant/Respondent

EXHIBIT UKOP5 INDEX

No.	Document	Date	Pages
UKOP5			
1.	Article by HertsLive: 'Police arrest 13 people during protest at Hemel Hempstead fuel depot'	10 April 2022	61 - 65
2.	Tweet by Just Stop Oil's Twitter Account	10 April 2022	66
3.	Press Release by Warwickshire Police: 'Update on Kingsbury Oil Terminal'	10 April 2022	67
4.	Press Release by Just Stop Oil: 'A Statement from the Just Stop Oil Coalition'	11 April 2022	68 - 72

5.	Article by Just Stop Oil: 'Breaking: Just Stop Oil supporters block 3 oil terminals on tenth day of action'	10 April 2022	73 - 75
6.	Article by The Guardian: 'Climate activists 'disrupt supplies from three oil terminals in England''	10 April 2022	76 - 78
7.	Tweet by Just Stop Oil's Twitter Account	10 April 2022	79
8.	Tweet by Just Stop Oil's Twitter Account	11 April 2022	80
9.	Tweet by Just Stop Oil's Twitter Account	10 April 2022	81
10.	Article by Sky News: 'Police warn about 'exceptionally dangerous' fuel protests as activists blockade oil terminals'	10 April 2022	82 - 88
11.	Various photographs of queues at fuel stations from 10 April 2022 (source: Article by the Independent: 'One in three petrol stations closed' in south of England amid oil terminal protests' dated 12 April 2022 and Article by the Daily Mail: 'Fuel shortage grips in Britain: One in three petrol stations in the South are CLOSED after eco mob cause ten days of chaos at oil terminals – as 80 activists target three more sites today' dated 10 April 2022	Various	89 - 90
12.	Article by The Sunday Times: 'Shortages and Queues at Filling Stations as Just Stop Oil Protestors Blockade Oil Terminals'	11 April 2022	91 - 99
13.	Article by BBC News: 'Extinction Rebellion protesters block Vauxhall and Lambeth bridges'	11 April 2022	100 - 109
14.	Article by The Guardian: 'Extinction Rebellion protesters force Lloyd's of London to close HQ'	12 April 2022	110 - 114
15.	Article by Extinction Rebellion: 'We have closed Lloyd's of London!'	12 April 2022	115 - 121
16.	Article by Independent: 'Just Stop Oil: Activists hacksaw into UK's largest inland terminal and chain themselves to pipes'	8 April 2022	122 - 125

Police arrest 13 people during protest at Hemel Hempstead fuel depot

Officers were called to Buncefield Oil terminal to reports of people blocking the entrance



By **Luke Donnelly** Multimedia Journalist
16:14, 10 APR 2022 | UPDATED 16:16, 10 APR 2022

NEWS

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Just Stop Oil protesters (Image: PA)

Hertfordshire Police has arrested 13 people in connection with a protest at a Hemel Hempstead fuel depot. Officers were called Buncefield Oil terminal at 2.20am today (April 10) to reports of people blocking the entrance.

They swiftly arrived at the scene and located 33 protesters outside the site. Police say officers initially engaged with the group, informing them that if they did not leave the site they would be arrested.

A total of 13 people were subsequently arrested and taken to police custody, where they remain at this time. The site entrance was clear by 12pm.

READ MORE: [Hertfordshire house prices: The 'quirky barn' you can buy that's hidden in King Langley's High Street](#)

This comes after the fuel depot was targeted earlier this month on April 1. Just Stop Oil - the organisation behind the protests - say more than 800 members have been arrested across the South East during the 10 days of "nonviolent disruptive action".

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Update on Kingsbury Oil Terminal

🕒 13:58 10/04/2022

A further 29 arrests have been made this weekend in connection with ongoing protest activity at Kingsbury Oil Terminal.

Those taken into custody this weekend were arrested for offences including criminal damage, conspiracy to cause criminal damage and conspiracy to commit public nuisance.

This takes the total number of arrests to 180 since protest activity began on 1 April.

The public will continue to see a heightened police presence in the vicinity of the site over the coming days.

Assistant Chief Constable Ben Smith said: "It has been another busy weekend for the force as protestors continue to target the Kingsbury site. As a result of unlawful protest activity another 29 people have been arrested and taken into custody.

"This weekend's protest activity has been contained to the Piccadilly Way area and has caused little disruption to the wider community, or to the operations of the oil terminal.

"While we will always recognise and respect the public's right to peaceful protest, we will take action against anyone who breaks the law or causes significant impact on the local community.

"Finally I'd like to thank the public for their ongoing patience and offer reassurance that we continue to do everything we can to minimise disruption to both the local community and the road networks, while trying to ensure Kingsbury are able to undertake their day-to-day operational activity."

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A STATEMENT FROM THE JUST STOP OIL COALITION



On Sunday afternoon a group of ordinary people, Just Stop Oil supporters, stopped and climbed on top of two oil tankers, and succeeded in forcing two major oil terminals in Warwickshire to cease operations. Further south, a group of young people accessed the Inter Terminal in Essex bringing production to a halt. These were the latest in a series of ongoing, nonviolent but disruptive actions at oil facilities around the country over the past 10 days.[1]

This morning, there remain up to 12 people still locked onto pipework in the Inter Terminal and a number of people still

occupying a tunnel under a major access route to the Kingsbury Oil terminal in Warwickshire, 40 hours after it was first excavated.

Over 400 people have joined actions that have succeeded in stopping operations for up to 24 hours at a time at 11 critical oil terminals that supply fuel to hundreds of petrol stations across the Midlands and South of England. As many as one in three petrol stations are being reported as shut in the South of England due to the disruption caused by the actions. [2]

This is miserable, and our hearts go out to all those who are disrupted. No-one wants to be doing this, but it's 2022 and right now there is a need to break the law so we are not guilty of greater crime, that of complicity with a great evil. We have no choice but to enter into civil resistance until the government announces an end to new oil and gas projects in the UK.

The government knows that if we continue down the path of extracting and burning every last drop of oil, it will destroy families, communities, nations. It means the loss of every pension, every school, our food, law and order. It's going to impact everyone and everything you love. We will face the starvation and the slaughter of billions – and the utter betrayal of our children and their future.

Climate collapse means we must wean ourselves off all oil and gas, including that extracted in the UK without delay. The government knows that investment in new fossil fuel supply projects jeopardises the future of humanity, but encourages it anyway. "Just one more fix to help us transition", we've been fed this line for decades and it's a barefaced lie. The International Energy Agency knows it and so does the UN Secretary General Antonio Guterres, he said as much in his speech last week. [3]

Today the Just Stop Oil coalition demands that the Government gets a grip, that they stop lying, that they stop recklessly destroying the future of life on earth and that they start by ending new oil and gas. There is no rational, human or moral

justification to continue. The supporters of Just Stop Oil will continue to disrupt until the government makes a statement that it will end new oil and gas projects in the UK.

There aren't endless five minutes to midnight, the Just Stop Oil Coalition is calling on all of those whose futures are being destroyed, who are facing poverty, and who are outraged at yet another betrayal to stand together in the only solidarity that matters anymore, the solidarity with life itself!

Join our daily zoom calls at 7pm. It's 2022 and the time to stand by has passed.

ENDS

Press contact: 07762 987334

Email: juststopoilpress@protonmail.com

High quality photos and video footage available here:

<https://drive.google.com/drive/folders/1Dgcuv5vJjzfdSrdpX6HJEaayoidc08xy?usp=sharing>

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Twitter: https://twitter.com/JustStop_Oil

Youtube: <https://www.youtube.com/channel/UC-t4U1Azf8AOkCBJILSNBmw>

Notes to Editors

[1] Locations

Just Stop Oil

- Inter Terminals UK Ltd, London Rd, Grays RM17 6YU

- Navigator terminals Thames, Oliver Rd, West Thurrock, Grays, RM20 3ED
- Buncefield Oil Depot, Hemel Hempstead HP2 7HZ
- Esso Petroleum Co Ltd, Wood Lane, Birmingham B24 8DN
- Kingsbury Oil Terminal, Tamworth, B78 2HA
- BP Oil Depot, Kingsbury, Tamworth B78 2EF
- Thames Oil Port, Stanford-le-hope, Essex
- Purfleet Fuels Terminal, London Road, Purfleet, Essex, RM19 1RS

Extinction Rebellion

- Esso West Terminal near Heathrow Airport
- Hamble Terminals in Southampton.
- Hythe Terminal, Fawley

[2] <https://www.dailymail.co.uk/news/article-10704779/Petrol-stations-fuel-shortage-Just-Stop-Oil-Extinction-Rebellion-protest-block-oil-depots.html>

[3] “If governments are serious about the climate crisis, there can be no new investments in oil, gas and coal, from now – from this year.” Fatih Birol, IEA

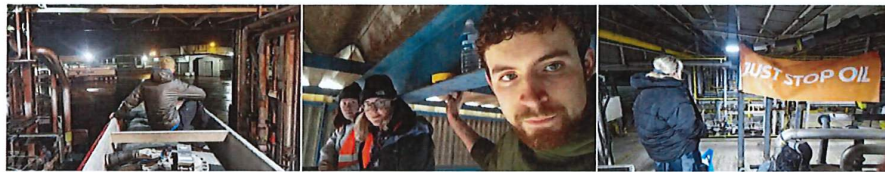
<https://www.theguardian.com/environment/2021/may/18/no-new-investment-in-fossil-fuels-demands-top-energy-economist>

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<https://www.un.org/press/en/2022/sgsm21228.doc.htm>

April 11, 2022 by [JSO Press](#) [Press](#)

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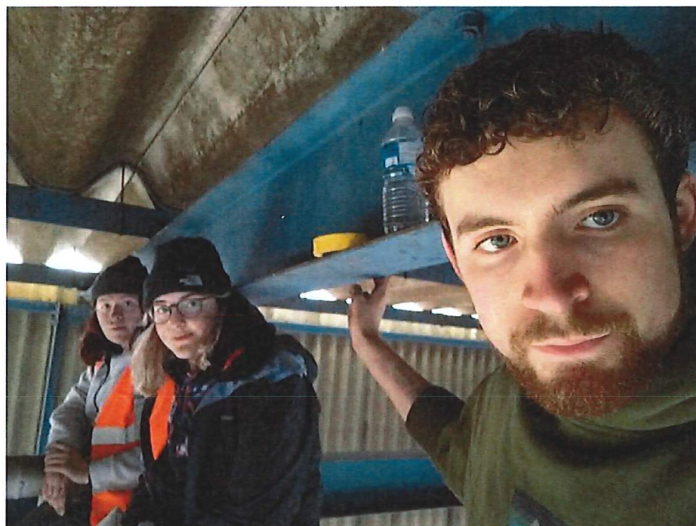


Just Stop Oil © 2022





Breaking: Just Stop Oil supporters block 3 oil terminals on tenth day of action



Supporters of Just Stop Oil have disrupted oil supplies from oil terminals in Warwickshire, Hertfordshire and Essex, marking the tenth day of action in support of their demand that the UK government end new oil and gas projects in the UK.

Overnight, supporters of Just Stop Oil dug a tunnel under a key tanker route to the BP Kingsbury Terminal in Warwickshire. The tunnel was concealed by a modified caravan parked on the roadside and surrounded by Just Stop Oil supporters. Despite a number of police arrests, 5 people remain inside the caravan this morning working on the tunnel.

At around 2:30am today, and despite a heavy police presence, 40 people approached the gates of the Buncefield oil terminal in Hertfordshire and locked on, blocking the entrance. This was followed at 6:30am by a further action at the Grays Inter Terminal in Thurrock where around 40 young people swarmed into the facility, climbed the loading bay pipework and locked on.

It is expected that this morning's actions will continue to significantly impact on fuel availability at petrol pumps across the South East and the Midlands.

So far during the 10 days of nonviolent disruptive action there have been over 800 arrests, with at least 80 more expected today. The supporters of Just Stop Oil will continue to block oil terminals until the government makes a statement that it will end new oil and gas projects in the UK.

Cat, 19 speaking from Grays Terminal this morning said

"I'm terrified and I hate heights but I've come here anyway because I'm more terrified of my future with fossil fuels. We need to ensure that the government gives out no new oil and gas licences. I will keep going until that happens. I've been strip searched and treated badly by police and it's been a really traumatising experience at times, but I will keep going because I know that this is the only option."

"I'm here in solidarity with the millions of people dying right now from the climate crisis, particularly in the global south and for the 6.5 million households who have been plunged into fuel poverty in this country while the oil companies make billions in profits and for all young people whose futures are being destroyed. We will not stand for it."

Ben Webb, who was arrested outside Buncefield this morning said

"I've got two beautiful daughters, and because of the government's inaction on the fossil fuel industry, they are going to experience unimaginable suffering and have an early death. That is

why I'm here today. This government is sick, they don't care about the future of our children, they just care about keeping the status quo, keeping the fossil fuel industry going, keeping the rich, rich and not caring about anybody else."

Rev. Tim Hewes, 71 a retired priest from Wantage, who is with the tunnellers said:

"I'm here because our government is useless, they make a lot of noise but they are doing nothing. As a priest I have a duty of care for people, and also for creation. What I'm doing here, with everyone in this caravan, is what our government should be doing – that is trying to protect our families and our loved ones from the appalling future that stands before us. I hope we can continue what we're doing and stop the flow of oil, if the government won't."

The Just Stop Oil Coalition is calling on all of those whose futures are being destroyed, who are facing poverty now, and who are outraged at yet another betrayal by this continuing dependence on oil and gas, to step up and take action. Join our daily zoom calls at 7pm. It's 2022 and the time to stand by has passed.

ENDS

Press contact: 07762 987334

Email: juststopoilpress@protonmail.com

High quality photos and video footage available here:

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Youtube: <https://www.youtube.com/channel/UC-t4U1Azf8AOkCBJILSNBmw>

Notes to Editors

[1] Locations

- Kingsbury Oil Terminal, Tamworth, B78 2HA
- Buncefield Oil Depot, Hemel Hempstead HP2 7HZ
- Inter Terminals UK Ltd, London Rd, Grays RM17 6YU

[2] About Just Stop Oil

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.

We must urgently end our reliance on fossil fuels to avoid irreversible changes in the earth's climate system. We cannot continue to burn fossil fuels in the belief that future developments in carbon capture and storage and other so-called "unicorn technologies" will allow us to suck vast quantities of carbon dioxide from the atmosphere.

The UK must begin this process immediately. It starts by calling a halt to any further fossil fuel projects on the UK Continental Shelf. That would give us eight years of fossil fuel production left in which to rapidly transition to a zero carbon economy.

Everyone knows we have to engage in massive changes. Just Stop Oil is a coalition of groups demanding the no-brainer things be done immediately – actions that will reduce the demand for fossil fuel energy dramatically such as insulating our homes, rethinking how we travel, getting on with renewable energy and making sure no-one is left behind.

We either come together as humanity or we die. Youth know which they choose. They have already chosen. They are in the streets to demand a future. We are all in the streets to make sure they get it. It's as basic as that.

Further information about Just Stop Oil and our demands here: <https://www.juststopoil.org>

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Environmental activism

Climate activists 'disrupt supplies from three oil terminals in England'

Just Stop Oil says action will affect fuel availability at petrol pumps across south-east and Midlands

Helen Pidd

Sun 10 Apr 2022 19.26 BST

Clean energy campaigners claim to have disrupted supplies from three oil terminals in the Midlands and south-east of [England](#), as motorists complain that some petrol stations are running short of fuel.

The government said only one terminal was out of action on Sunday afternoon as a result of [the Just Stop Oil protests](#), and that local police forces were working with the industry to ensure that fuel supplies can be maintained.

“Currently all supply points are operational except one and this will allow deliveries to be made to those sites which have experienced shortages,” said a government spokesperson.

[On Monday morning a spokesman for the Department for Business [Energy](#) and Industrial Strategy said all supply points were operational.]

There was also disruption in central London as Extinction Rebellion activists stopped traffic crossing Lambeth and Vauxhall bridges.

Hundreds of climate campaigners took to Lambeth bridge, which links Westminster and Lambeth, backed by speakers playing dance music creating a festival atmosphere. Cars and buses were stopped, but demonstrators parted to allow ambulances to pass. By 6pm Lambeth had been cleared of protesters, while traffic resumed on Vauxhall Bridge about an hour and a half later. Police said 38 arrests had been made.

Howard Cox, the founder FairFuelUK, which campaigns for low fuel prices for motorists, said he had been “bombarded with messages that garages up and down the country are short of petrol and diesel stock”.

Cox said the blockades by Just Stop Oil were to blame for the shortage, accusing campaigners of carrying out “a pointless crusade they believe will save the planet”.

But Caroline Lucas, the Green party MP, said such disruptive protests were the “only way that people feel they can make their voices heard”. Just Stop Oil said on Sunday that activists were disrupting supplies from fuel supply points in Warwickshire, Hertfordshire and Essex.

The group said supporters had dug a tunnel under a tanker route to the Kingsbury terminal in Warwickshire. “The tunnel was concealed by a modified caravan parked on the roadside and surrounded by Just Stop Oil supporters. Despite a number of police arrests, five people remain inside the caravan this morning working on the tunnel,” the group said in a statement.

At 2.30am, 40 campaigners approached the gates of the Buncefield oil terminal in Hertfordshire and locked themselves on to it, blocking the entrance, the group said. This was followed at 6.30am by a further action at Inter Terminals in Grays, Essex, where about 40 people swarmed into the facility, climbed the loading bay pipework and locked on, they claimed.

“It is expected that this morning’s actions will continue to significantly impact on fuel availability at petrol pumps across the south-east and the Midlands,” the group said on its 10th day of action demanding that the UK government end new oil and gas projects in the UK.

A government spokesperson said: “We are aware that protest activity at some oil terminals has led to short-term disruptions to fuel deliveries over the past few days. The local police forces are working with the industry to ensure that fuel supplies can be maintained.”

In an interview on the Sunday Morning show on BBC One, Lucas said: “I am sorry that it has come to this and that this is the only way that people feel they can make their voices heard.

“The International Energy Agency says that ... the latest IPCC [Intergovernmental Panel on Climate Change] report says that, and yet this government and this energy strategy ... is foreseeing getting out even more oil and gas from the North Sea. That is frankly immoral and the UN general secretary said that is frankly both morally and economically mad.”

This article was amended on 11 April 2022 to include a later statement from government saying that all supply points were now operational.



JustStopOil @JustStop_Oil · Apr 10

...

30 #JustStopOil supporters in the loading bay of Inter, Grays.

Putting their freedom on the line right now so we can have safer future.
This will stop when @10DowningStreet says they will
[#StopAllNewFossilFuelLicences.](#)



💬 23

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...

Today [#JustStopOil](#) demand [@10DowningStreet](#) get a grip, stop lying, stop recklessly destroying our future.

Start by ending new oil & gas.

We will continue to disrupt until the govt makes a statement that it will end new oil & gas projects in the UK.



juststopoil.org

A STATEMENT FROM THE JUST STOP OIL COALITION – Just Stop Oil

A STATEMENT FROM THE JUST STOP OIL COALITION On Sunday

afternoon a group of ordinary people, Just Stop Oil supporters, stoppe...

💬 15

↻ 26

♥ 75





JustStopOil @JustStop_Oil · Apr 10



BREAKING: 40 students and young people have entered the Grays Inter terminal to cease works at the site.

The United Kingdom ranks 15th in the world for oil consumption. Our treasonous govt is killing us with poison.

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💬 25

↻ 63

❤ 240



Police warn about 'exceptionally dangerous' fuel protests as activists blockade oil terminals

Anti-petrol activists in Essex are blocking petrol stations from getting refills and stopping delivery tankers from leaving ports.

🕒 Sunday 10 April 2022 19:34, UK



Extinction Rebellion activists protested last year at COP26 and are now stepping up the pressure. File pic



 Why you can trust Sky News >

Essex Police have warned that days of "exceptionally dangerous" fuel protests are creating an "unacceptable" risk of harm for police and activists.

The number of arrests is nearing 350 as activists from Just Stop Oil and Extinction Rebellion are blocking access to oil terminals in Essex by gluing themselves to the road and attaching themselves to fuel tankers with bike locks.



The Daily Climate Show

Aggrieved drivers across the country - who are already having to handle increased prices - are complaining of huge queues and closed stations as a result of the protests.

Police said there have been 338 arrests since 1 April when protests began, and another 26 are expected to be made today, taking the total to 364.

More than 20 protesters arrived at Exolum Storage in Grays on Sunday morning.

Advertisement

Advertisement

Essex Police's assistant chief constable Glen Pavelin said: "We cannot stand by while criminal acts are being committed, and lives are being put at risk, in the name of protest.

"We are not anti-protest. Our job is to preserve life and catch criminals, and that's what we're going to do.

MORE ON ESSEX



Just Stop Oil: At least 13 people arrested in Essex as protest group blocks key oil terminals



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"Today's protest is exceptionally dangerous due to where the protesters have located themselves within the site.

"Our officers have been diligent in ensuring that all protesters know the risks involved, and we've been working hard to minimise the dangers this

morning.

"Put simply: we don't want anyone to get hurt."

The protests in Thurrock have cost the force "in excess of £1 million" it said.




Mr Pavelin added the "acts of criminality on site are not only illegal, but they are continuing to put themselves and our officers at real risk of harm and that is unacceptable".


"We've been lucky to have extra support from specialist officers from across the country, to support some of our officers continuing with their day jobs," he said.




Beyond Essex, Warwickshire Police said that a further 29 arrests have been made this weekend in connection with ongoing protests at Kingsbury Oil Terminal.

JustStopOil
@JustStop_Oil



Nonviolent action to stop the [#petrol](#) and [#diesel](#) from leaving Buncefield oil terminal.
"I won't be stopped, and I won't back down until our government stops trading our lives for profit"

6:57 AM · Apr 10, 2022 

 122  Reply  Share

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Those in custody have been arrested for offences including criminal damage, conspiracy to cause criminal damage and conspiracy to commit public nuisance in what assistant chief constable Ben Smith described as "another busy weekend" for the force.

This takes the total number of arrests to 180 since the protests began.

Mr Smith, who said there would be a heightened police presence at the site over the coming days, added: "This weekend's protest activity has been contained to the Piccadilly Way area and has caused little disruption to the wider community, or to the operations of the oil terminal.

"While we will always recognise and respect the public's right to peaceful protest, we will take action against anyone who breaks the law or causes significant impact on the local community."

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SHORTAGES AND QUEUES AT FILLING STATIONS AS JUST STOP OIL PROTESTERS BLOCKADE OIL TERMINALS

Activists branded "amoebas"

Published 11 April 2022

By David Mullen (<https://www.driving.co.uk/contributor/http://david-mullen>)



(<https://www.facebook.com/sharer/sharer.php?u=https://www.driving.co.uk/news/shortages-and-queues-at-filling-stations-as-just-stop-oil-protesters-blockade-oil-terminals/>)



([https://twitter.com/intent/tweet?text=Shortages and queues at filling stations as Just Stop Oil protesters blockade oil terminals%20https://www.driving.co.uk/news/shortages-and-queues-at-filling-stations-as-just-stop-oil-protesters-blockade-oil-terminals/](https://twitter.com/intent/tweet?text=Shortages+and+queues+at+filing+stations+as+Just+Stop+Oil+protesters+blockade+oil+terminals%20https://www.driving.co.uk/news/shortages-and-queues-at-filling-stations-as-just-stop-oil-protesters-blockade-oil-terminals/))



(<https://plus.google.com/share?url=https://www.driving.co.uk/news/shortages-and-queues-at-filling-stations-as-just-stop-oil-protesters-blockade-oil-terminals/>)

The environmental activist group Just Stop Oil has created disruptions at three oil terminals in the south of England, leading to reports of long queues and fuel shortages at some filling stations.

At around 2.30pm yesterday (April 10), a group of 40 people locked themselves to the gates of the Buncefield oil terminal in Hemel Hempstead, Hertfordshire, while that evening another group of protesters chained themselves to the external pipework of the Grays oil terminal near Thurrock in Essex. Protests have continued too at the Kingsbury oil terminal in Warwickshire.

Reports from various sources indicate that deliveries of oil from the terminals have been disrupted as a result of the protests, leading to the closure of one in three petrol stations in some parts of the UK according to The Sun and 1,200 pumps south of the midlands running dry, according to other reports.

"We are getting credible intelligence that one in three garages have run dry of petrol and/or diesel particularly in the south, because of the 'stop oil' amoebas," tweeted the campaign group Fair Fuel UK over the weekend.

Commenting on the protests and rumours of shortages, a government spokesperson said:

"We are aware that protest activity at some oil terminals has led to short-term disruptions to fuel deliveries over the past few days. The local police forces are working with the industry to ensure that fuel supplies can be maintained."

The Home Secretary, Priti Patel was even more strident, branding the protesters as "selfish, fanatical and frankly dangerous so-called activists."

There have been around 330 arrests since the protests began, including 20 yesterday in Essex and a further 29 over the weekend in Warwickshire, mainly on charges of criminal damage, conspiracy to cause criminal damage and conspiracy to commit public nuisance.

"We cannot stand by while criminal acts are being committed, and lives are being put at risk, in the name of protest," said Assistant Chief Constable for Essex, Glen Pavelin.

"We are not anti-protest. Our job is to preserve life and catch criminals, and that's what we're going to do. Today's protest is exceptionally dangerous due to where the protesters have located themselves within the site.

"Our officers have been diligent in ensuring that all protesters know the risks involved, and we've been working hard to minimise the dangers this morning. Put simply: we don't want anyone to get hurt."

Some 180 protesters have now been arrested due to the ongoing protests at the Kingsbury terminal. In one incident, activist groups dug a tunnel under a tanker route out of the terminal concealed by a modified caravan parked at the side of the road and surrounded by Just Stop Oil protesters. Despite arrests, five people remain inside the caravan working on the tunnel according to a statement released by the group.

The protests come amid record-high fuel prices exacerbated by the Russian invasion of Ukraine, which have seen diesel break the £2 per litre mark in a number of locations over the past few weeks. The spiralling cost of fuel led to the Chancellor, Rishi Sunak, announcing a 5p cut to fuel duty as part of his Spring Statement mini-budget and, though prices have fallen, they remain notably high at 162.44p per litre on average for petrol and 176.74p per litre for diesel.

The protests also follow the Intergovernmental Panel on Climate Change's recent stark report warning that it was "now or never" for countries to reduce their carbon emissions so as to avoid average global temperatures exceeding 1.5°C above pre-industrial levels, the point at which most of the effects of climate breakdown will become irreversible. The environmental impact of failing to massively reduce carbon emissions by phasing-out the use of fossil fuels and decarbonising the transport sector in the coming years will be "catastrophic" according to the IPCC's previous report released in February.

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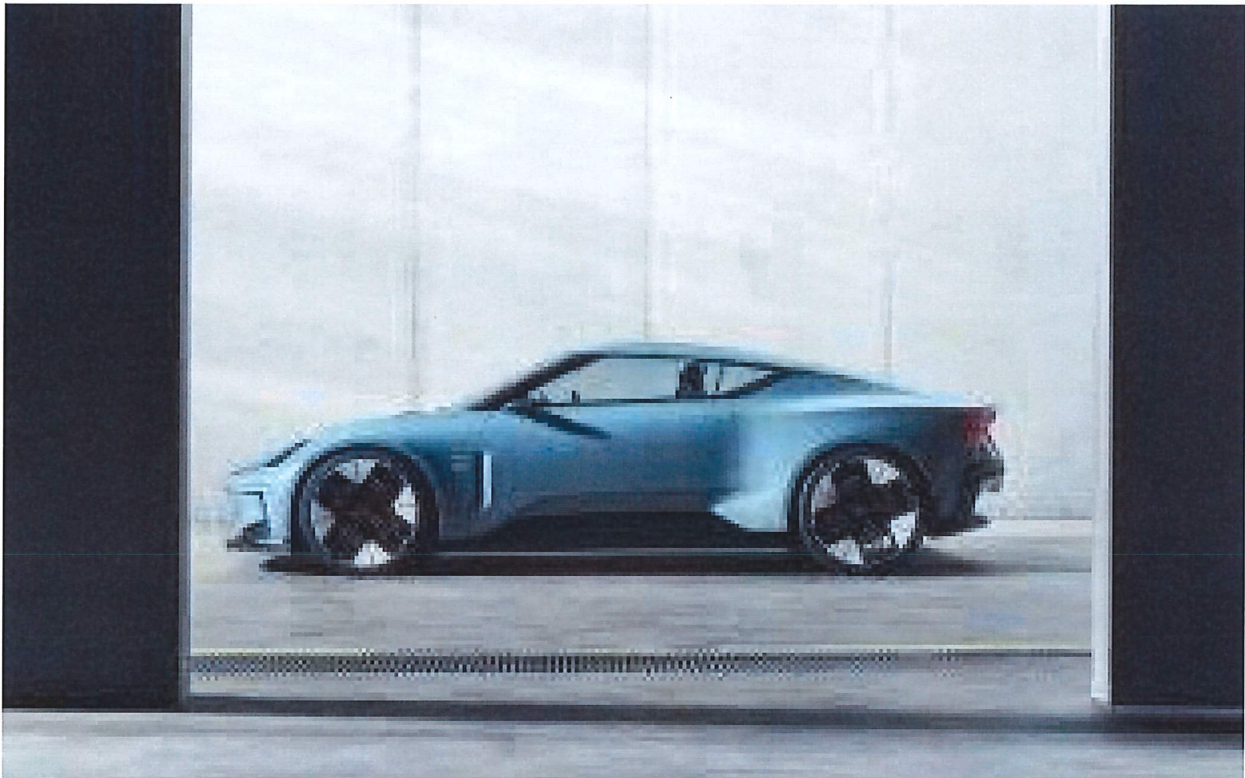


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Extinction Rebellion protests block Vauxhall and Lambeth bridges

🕒 2 days ago

UK climate change protests



PA MEDIA

The Metropolitan Police said the protesters had been moved from Lambeth and Vauxhall bridges

Extinction Rebellion climate change activists have staged protests in the centre of London for a second day, blocking Vauxhall and Lambeth bridges.

Hundreds of protesters prevented cars and buses crossing but ambulances were let through.

The Met Police said 38 arrests were made on Sunday and officers had now moved protesters from the bridges.

Green Party MP Caroline Lucas earlier told the BBC the group's protests could sometimes be counterproductive.

But for some people, the rallies were the only way they felt heard, she said. The government has yet to comment.

During the earlier protests, campaigners sat in the road, waving flags and placards.

They were told by police officers there was evidence they were causing "serious disruption" to the public, warning them to leave or face arrest.

The Met said it imposed conditions under section 14 of the Public Order Act 1986 to clear protesters from around Vauxhall Bridge and officers physically removed the last of the activists - with a number being taken away in police vans.



Health professionals were among protesters blocking Lambeth Bridge

Doctors and nurses from a small group of medical workers who refused to leave Lambeth Bridge were among those arrested, Extinction Rebellion tweeted.

Earlier, one of the protesters - Kiri Ley, 21, a student from Birmingham - said the aim was to occupy the capital peacefully to try to force policy changes.

She said: "We tried all the other methods - we've written letters, we've marched, we've spoken to our MPs, we've done literally everything we can and time and time again we see them doing completely the opposite of what the scientific evidence says and this is what is left to us, really, we do it because we know it works."

Earlier, campaigners also spray painted red hands outside the London corporate offices of oilfield services company Schlumberger.



PA MEDIA

Vauxhall Bridge was also blocked by the protesters

Ms Lucas said: "I am sorry that it has come to this and that this is the only way that people feel they can make their voices heard."

The activists have vowed to block areas of London "for as long as possible" every day for at least a week.

A protest in Oxford Circus on Saturday brought the West End to a standstill.





| Caroline Lucas told BBC Sunday Morning that protests "can capture people's imaginations"

Ms Lucas said: "Personally for example, if you are going to try and stop Tube trains moving around I think that is counterproductive.

"I think that being on the streets of London has been shown to be a way of capturing people's imaginations.

"People have joined those protests who have never protested before. They are doing it because they know we have to leave new fossil fuels in the ground.

"The International Energy Agency says that, the latest IPCC (Intergovernmental Panel on Climate Change) report says that, and yet this government and this energy strategy... is foreseeing getting out even more oil and gas from the North Sea, that is frankly immoral and the UN general secretary said that is frankly both morally and economically mad."



PA MEDIA

| Protesters prevented cars crossing Lambeth Bridge

The Met tweeted on Sunday evening: "Both demonstrations within the Vauxhall Area have now concluded and the roads have reopened.

"As a result of today's policing operation we have made 38 arrests."

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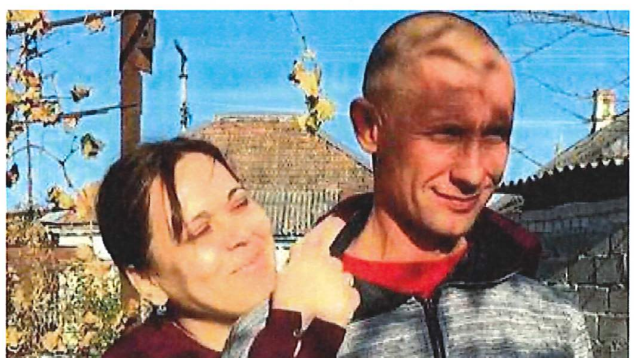
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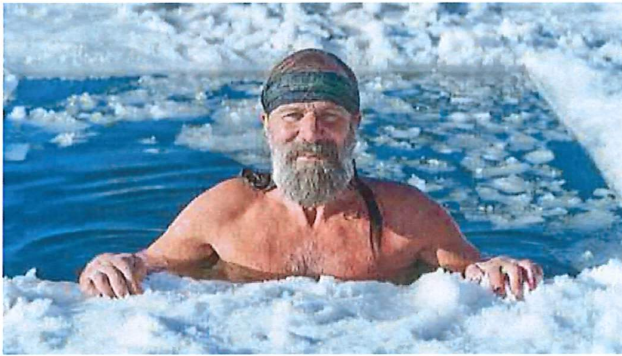


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Lloyd's

Extinction Rebellion protesters force Lloyd's of London to close HQ

Environmentalists block entrance to insurance market as they demand end to fossil fuel support

Joanna Partridge

Tue 12 Apr 2022 15.50 BST

Extinction Rebellion protesters have forced the closure of the insurance market **Lloyd's of London**, after using superglue, chains and bicycle locks to block entrances to the building.

The environmental activist group said more than 60 people had been at the site in the City of **London** since 7am on Tuesday to prevent workers from entering and with the intention of closing the business for the day.

Extinction Rebellion (XR), which encourages supporters to cause disruption through non-violent civil disobedience, said it was demanding that Lloyd's stops insuring fossil fuel projects.



📷 An XR protester dressed as Boris Johnson. Photograph: Matt Dunham/AP

Some of the protesters wore rat masks, while others were dressed as cleaners, with floral tabards emblazoned with the slogan: “Tell the truth”.

Several activists scaled the building’s **distinctive curved metal and glass facade**, and unfurled a banner that read: “End fossil fuels now”.

Lloyd’s, the world’s biggest insurance market, said it had asked employees and other people not to come to the building on Tuesday. It said the market remained open and trading was taking place online.



📷 Activists gather on a Lloyd's stairwell. Photograph: Dominic Lipinski/PA

A Lloyd's spokesperson said: "Lloyd's supports safe and constructive engagement on climate change and we're continuing to work to support a responsible transition."

The City of London police said there had not been any arrests by early afternoon and officers were working to "facilitate peaceful protest".

Commander Umer Khan, from the force, said: "Police officers are working with key partners and liaising with Lloyd's to facilitate peaceful protest and to provide a proportionate response."



XR encourages supporters to cause disruption. Photograph: Guy Bell/Rex/Shutterstock

XR's action at Lloyd's comes just days after its supporters [blocked Tower Bridge in London](#), causing it to be closed for several hours on Friday.

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XR [activists](#) have also been [staging blockades at fuel distribution terminals](#), as part of the Just Stop Oil campaign, leading to growing reports of shortages at petrol stations forecourts.

The group warned earlier in the month that it was planning to conduct its most disruptive protests yet on the streets of the capital.



📷 Extinction Rebellion signs and masks depicting Rishi Sunak, Michael Gove and Priti Patel are left on the ground outside the Lloyd's of London building. Photograph: Henry Nicholls/Reuters

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Not in the UK? Visit the [Extinction Rebellion Global Website](https://extinctionrebellion.org.uk/).



We have closed Lloyd's of London!

April 12, 2022 by Extinction Rebellion

Today at 7 AM, a group of 60 people closed all the entrances to Lloyd's of London's building in the City of London. This is the first time XR has closed down a financial institution completely for a whole day. They chained or glued themselves to doors, then dropped huge banners reading 'Lloyd's insure climate breakdown' and 'End Fossil Fuels Now'.

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Credit: Gareth Morris

HOW BAD IS LLOYD'S OF LONDON?

Lloyd's insures 40% of the world's energy, including some of the world's worst fossil fuel projects such as coal mines, tar sands pipelines, and new oil & gas exploration. Their business is fuelling Climate Breakdown.

Without insurance, a fossil fuel project can't go ahead. Companies like Lloyd's, who insure these projects, are effectively enabling them. This is why the insurance industry is such a key player.

Most insurers have started to phase out fossil fuel support. Not Lloyd's. By pressuring it, we can cut another lifeline of the fossil fuel industry.

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Credit: Gareth Morris

SOLIDARITY WITH THE LAND PROTECTORS

We are doing this action in solidarity with the Land Protectors trying to stop The Trans Mountain Pipeline expansion (TMX) in Western Canada. That pipeline would triple the export capacity for tar sands, one of the dirtiest oils in the world. In addition, it does not have consent from Indigenous peoples whose lands it goes through.

The Land Protectors resisting TMX have been using their bodies to block the construction. They have asked Rebels to join their struggle by demanding Lloyd's of London stop insuring the project.

Led by Traditional Owners' people across the world have pressured 16 insurers to cut ties with the project. Lloyd's must do the same now.

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Credit: Gareth Morris

LLOYD'S, TELL THE TRUTH!

One of the Rebels taking part in the action said: "The Lloyd's building is a great example of bowellism architecture, which shows the bowels of the building on the outside, things we usually hide: pipes, sewage, stairways. And it's what we're asking Lloyd's to do: tell the truth about what's going on inside this building, the dirty work they're doing."

Lloyd's has always been a pillar of support of extractive colonialism – the economic domination of mainly global south countries by global north imperialist forces. This includes sugar, tobacco, coffee, slaves, and eventually fossil fuels.

By insuring fossil fuels projects, Lloyd's support, enable, and cover some of the world's worst polluting industries such as tar sands, arctic oil and gas drilling, and coal mines, none of which are compatible with keeping global warming to a maximum of 1.5C.

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Would you like a cup of honestea? – Credit Guy Reece

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Just Stop Oil: Activists hacksaw into UK's largest inland terminal and chain themselves to pipes

37 protesters broke into Warwickshire site in middle of night, bringing distribution to halt

Colin Drury • 6 days ago • [35](#) Comments



A protestor sits atop a tanker at the Kingsbury Oil Terminal
(Just Stop Oil)



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Climate activists have broken into the UK's largest inland oil terminal and chained themselves to pipes, bringing distribution to a halt.

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Thirty-seven Just Stop Oil protesters scaled a spiked fence and used a hacksaw to break through an unguarded rear gate into the Kingsbury site, in **Warwickshire**, just after midnight on Thursday.



They let down the tyres of parked-up tankers before climbing onto the trucks and handcuffing themselves to pipework. Police, who were guarding the front entrance at the time, were left apparently flat-footed by the break-in.



The demonstrators told *The Independent* they knew they faced arrest but felt their

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anything beyond some disruption either but no-one else I've come across as come up with a better plan so it's vital we do this stuff.

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"I don't want to be here. It's freezing cold on a horrible industrial plant – I'm going to end up being arrested – but it's the only way I can see to try and get through to the government and to people, and to confront the complacency around the damage fossil fuels are doing."

Reports suggest workers at the site may have turned on sprinklers in a bid to stop the activists' occupation. But Mr Sheeky, a 46-year-old environmental consultant from **Warrington**, said Just Stop Oil's fight was not with staff.

"If we were transitioning to green economy we would be seeing thousands of cleaner, good quality jobs created," he added.

By 10am on Thursday morning, it is thought about half of the protestors inside the site – which is operated by Indian multinational Essar – had been arrested and removed.

Warwickshire Police said a "significant operation" was underway that would "take action to deal with unlawful activity robustly and protect the rights of others".

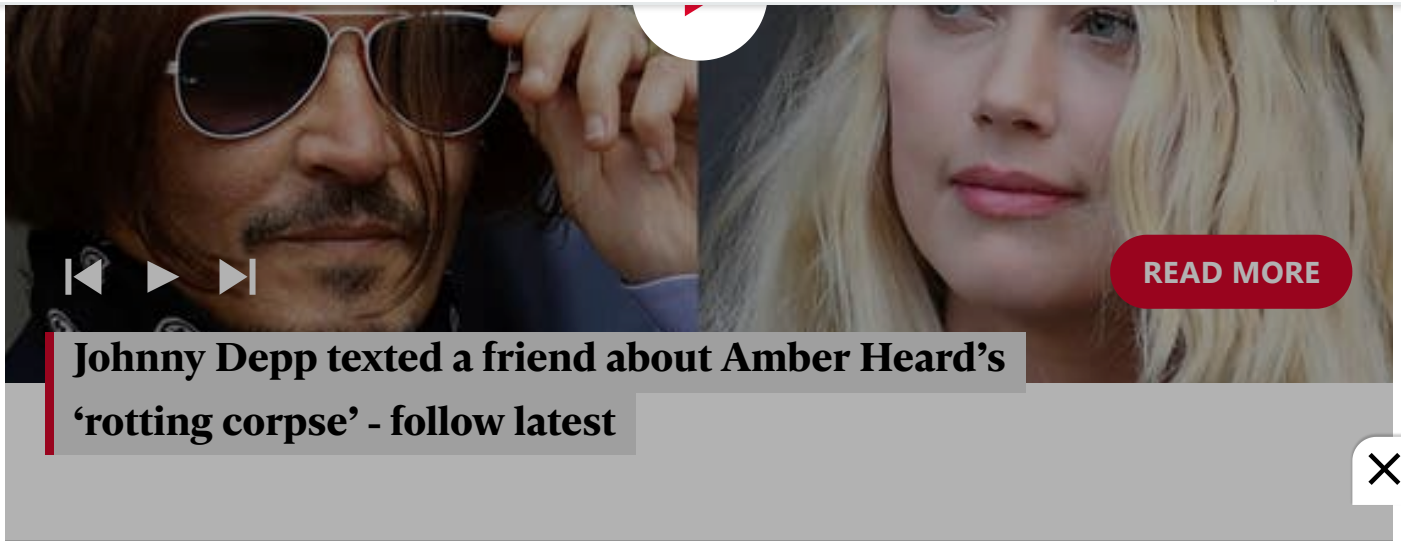
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The occupation comes as part of a spring and summer of civil disobedience planned by Just Stop Oil and sister group **Extinction Rebellion**, which has so far included blockading the massive Navigator oil terminal in Essex and disrupting Premier League football matches. Some 400 people have been arrested since 1 April.

The groups point to Monday's **Intergovernmental Panel on Climate Change** report as proof of the need for such drastic action.

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How clean energy could see environmental activism become even more deadly



The energy strategy fails to address any of the major issues we face | Harry Cockburn



UK energy strategy will give North Sea oil and gas 'new lease of life', says Johnson

In that, **United Nations** scientists said the time was "now or never" to limit the destruction that is already being wrought by the climate crisis. They said a "rapid, deep and immediate" cuts in carbon dioxide emissions must now take place and called for an end to the fossil fuel age.



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**IN THE HIGH COURT OF JUSTICE
BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES
CHANCERY DIVISION
PROPERTY TRUSTS AND PROBATE LIST**

Claim No. PT-2022-000303



PT-2022-000303

Mr Peter Knox QC, sitting as a Deputy Judge

Friday 08 April 2022

B E T W E E N

(1) UNITED KINGDOM OIL PIPELINES LIMITED

(2) WEST LONDON PIPELINE AND STORAGE LIMITED

Claimants / Applicants

and

(1) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT CONSENT, AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN, ON LAND AND BUILDINGS AT AND COMPRISING PART OF (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED RED ON THE ATTACHED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE (SHOWN FOR IDENTIFICATION SHADED RED ON THE ATTACHED SITE 2 PLAN)

First Defendants/Respondents

(2) PERSONS UNKNOWN WITHOUT CONSENT, AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN, OBSTRUCTING OR INTERFERING WITH THE FIRST CLAIMANT'S ACCESS OVER PRIVATE ACCESS ROADS ADJACENT TO (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED BLUE ON THE ATTACHED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE (SHOWN FOR IDENTIFICATION SHADED BLUE ON THE ATTACHED SITE 2 PLAN)

Second Defendants/Respondents

ORDER AGAINST THE FIRST AND SECOND DEFENDANTS

(COLLECTIVELY "THE DEFENDANTS")

PENAL NOTICE

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

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

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing certain acts. You should read this Order very carefully. You are advised to consult a solicitor as soon as possible.

If you disobey this Order you may be found guilty of contempt of court and you may be sent to prison or your assets seized.

You have the right to apply to the court to vary or discharge this order (which is explained below).

RECITALS

UPON the hearing of the Claimants' Application dated 7 April 2022

UPON hearing Katharine Holland QC Leading Counsel and Yaaser Vanderman Junior Counsel for the Claimants

AND UPON READING the Claimants' written evidence listed in Schedule 1

AND UPON the Claimants giving and the Court accepting the undertakings listed in Schedule 3

AND UPON the Claimants acknowledging that they do not intend to prohibit any lawful protest outside any of the sites referred to in this Order and that this Order is not intended to prohibit such lawful protest

IT IS ORDERED THAT:

THE INJUNCTIONS

1. Until trial or further order:

(a) **BUNCEFIELD (SITE 1)**

2. The First Defendants and each of them are forbidden from (a) entering or remaining upon the land or buildings described in and defined as "**Buncefield (Site 1)**" in Schedule 2 to this Order and

which are shown for illustration purposes shaded red on the plan annexed to Schedule 4 of the Order ("**the Site 1 Plan**"), or (b) from causing damage to Buncefield (Site 1) or (c) removing equipment from Buncefield (Site 1), without the consent of the Claimants.

3. The Second Defendants and each of them are forbidden from obstructing or otherwise interfering with the First Claimant's access over the private access road on the land adjoining Buncefield Site 1 (the "**Site 1 Access Route**"), which is shown for illustration purposes shaded blue on the Site 1 Plan, for access and egress between Buncefield (Site 1) and the public highway.

(b) KINGSBURY (SITE 2)

4. The First Defendants and each of them are forbidden from (a) entering or remaining upon the land or buildings described in and defined as "**Kingsbury (Site 2)**" in Schedule 2 to this Order and which are shown for illustration purposes shaded red on the plan annexed to Schedule 5 of the Order (the "**Site 2 Plan**") or (b) from causing damage to Kingsbury (Site 2) or (c) removing equipment from Kingsbury (Site 2), without the consent of the First Claimant.
5. The Second Defendants and each of them are forbidden from obstructing or otherwise interfering with the First Claimant's access over the private access road on the land adjoining Site 2 (the "**Site 2 Access Route**"), which is shown for illustration purposes shaded blue on the Site 2 Plan, for access and egress between Kingsbury (Site 2) and the public highway.

VARIATION OF THIS ORDER

6. Anyone served or notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimants' solicitors 12 hours' notice of such application. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Claimants' solicitors at least 6 hours in advance of any hearing.
7. 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.
8. The Claimants have liberty to apply to extend or vary this Order or to seek further directions.

RETURN DATE

9. The return date hearing will be fixed for 20 April 2022 ("**the Return Date**") with a time estimate of 3 hours, the matter to be reserved to Mr Peter Knox QC sitting as a Deputy Judge (without prejudice to any application by any Defendant that another judge hear the matter).
10. Permission for the Claimants to file and serve any further evidence by 4.30 pm on Thursday 14 April 2022.
11. Permission for the Defendants to file and serve evidence by 4.30 pm on Tuesday 19 April 2022.

INTERPRETATION OF THIS ORDER

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

SERVICE OF THIS ORDER

13. Pursuant to CPR 6.15, 6.27 and 81.4(2)(c) and (d), service of this Order, and the documents comprising the Claim Form, the Particulars of Claim, the Response Pack, the Application Notice dated 7 April 2022, the First Witness Statement of John Armstrong dated 7 April 2022, the First Witness Statement of Peter Davis dated 7 April 2022, the First Witness Statement of Daniel Owen Christopher Talfan Davies dated 8 April 2022, an Application Notice in respect of the Return Date hearing and any further evidence to be relied upon on the Return Date ("**the Court Documents**") shall be effected as follows:
- (a) Fixing copies thereof in clear transparent sealed containers at a minimum number of 2 prominent locations on the perimeter of each of the Sites together with a notice which states that copies of the Order and the Court Documents may be obtained from the Claimants' solicitors, Fieldfisher LLP, Riverbank House, 2 Swan Lane, London, EC4R 3TT (tel: 020 7861 4000) email: UKOPinjunction@fieldfisher.com via, and may be viewed at, the web link referred to in paragraph 13(b) of this Order;
 - (b) Posting the Order and the Court Documents at the following web link: <https://ukop.azurewebsites.net> ;
 - (c) Fixing warning notices in the form set out in Schedules 6 - 7 (together, "**the Notices**") as follows in not less than A2 size:
 - (i) In respect of **Buncefield (Site 1)** by affixing the form of site injunction notice set out in Schedule 6 (the "**Site 1 Notice**") in clearly visible locations (including at entranceways, access points, gates and attached to the perimeter fencing) around and comprising part of Site 1; and
 - (ii) In respect of **Kingsbury (Site 2)** by affixing the form of site injunction notice set out in Schedule 7 (the "**Site 2 Notice**") in clearly visible locations (including at entranceways, access points, gates and attached to the perimeter fencing) around and comprising part of Kingsbury (Site 2);
 - (d) Sending an email to each of the following email addresses with the information that copies of the Order and the Court Documents may be viewed at the web link referred to in paragraph 13(b) above:
 - (i) xr-legal@riseup.net;
 - (ii) juststopoil@protonmail.co.uk
14. Pursuant to CPR 6.15(3), 6.27 and 81.4(2)(c) and (d), the Order and Court Documents will be deemed to be served on the latest date on which all of the methods of service referred to in paragraph 13 above have been completed, such date to be verified by the completion of a certificate of service.

15. Pursuant to CPR 6.15, 6.27 and 81.4(2)(c) and (d), the steps identified in paragraph 13 above shall stand as good service of the Order and Court Documents.
16. Pursuant to CPR 6.15(4), the period for service of any acknowledgement of service, admission or defence shall be 56 days.

COSTS

17. Costs reserved.

COMMUNICATIONS WITH THE COURT

18. All communications about this Order should be sent to:

Court Manager
High Court of Justice
Chancery Division
Rolls Building
7 Rolls Building
Fetter Lane
London
EC4A 1NL

The telephone number is 020 7947 7501. The offices are open weekdays 10.00 a.m. to 4.30 p.m.

Out of hours telephone number is 020 7947 6260

19. Name and address of the Claimants' legal representatives

Fieldfisher LLP
Riverbank House
2 Swan Lane
London
EC4R 3TT

Telephone: 020 7861 4000

Fax: 020 7488 0084

Out of hours telephone number: 07711 088057

Reference: OTD/UK01.000162.00301

This Order shall be served by the Claimants on the Defendants. The Court has provided a sealed copy of this Order to the Claimants at:

Fieldfisher LLP
Riverbank House,
2 Swan Lane,
London
EC4R 3TT

Reference: OTD/000162

SCHEDULE 1

1. Witness Statement of Peter Davis dated 7 April 2022
2. Witness Statement of John Armstrong dated 7 April 2022
3. Witness Statement of Daniel Owen Christopher Talfan Davies dated 8 April 2022

SCHEDULE 2

THE SITES

Buncefield (Site 1))

1. The freehold land at:
 - (a) Land and buildings on the south side of Cherry Tree Lane, Hemel Hempstead which is registered at the Land Registry under title number HD485114 and marked 1 on the Site 1 Plan;
 - (b) Land to the north of Cherry Tree Lane, Hemel Hempstead which is registered at the Land Registry under title number HD485115 and marked 2 on the Site 1 Plan;
 - (c) Land on the west side of Buncefield Lane, Hemel Hempstead which is registered at the Land Registry under title number HD485116 and marked 3 on the Site 1 Plan;
 - (d) Land on the north east and south west side of Three Cherry Trees Lane, Hemel Hempstead registered at the Land Registry under title number HD485118 and marked 5 on the Site 1 Plan;
2. The leasehold land at:
 - (a) land on the north side of Cherry Tree Lane, Hemel Hempstead, as more particularly described by a lease dated 23 September 2013 made between (1) Total UK Limited and (2) United Oil Kingdom Pipelines Limited which is registered at the Land Registry under title number HD529733 and marked 4 on the Site 1 Plan.

Kingsbury (Site 2)

3. The freehold land at:
 - (a) All that piece of land at Kingsbury in the County of Warwick comprising 4.96 acres or thereabouts as more particularly described by a conveyance dated 31 March 1967 and made between (1) Shell-Mex and B.P. Limited and (2) United Oil Kingdom Pipelines Limited and marked 1 on the Site 2 Plan;
 - (b) Land on the south-east side of Trinity Road, Kingsbury, Tamworth which is registered at the Land Registry under title number WK468465 and marked 2 on the Site 2 Plan.
4. The leasehold land at:
 - (a) land at Kingsbury in the County of Warwick, as more particularly described in a lease dated 3 November 2021 made between (1) The Secretary of State for Defence and (2) United Oil Kingdom Pipelines Limited and marked 3 on the Site 2 Plan.

(together, the "**Sites**")

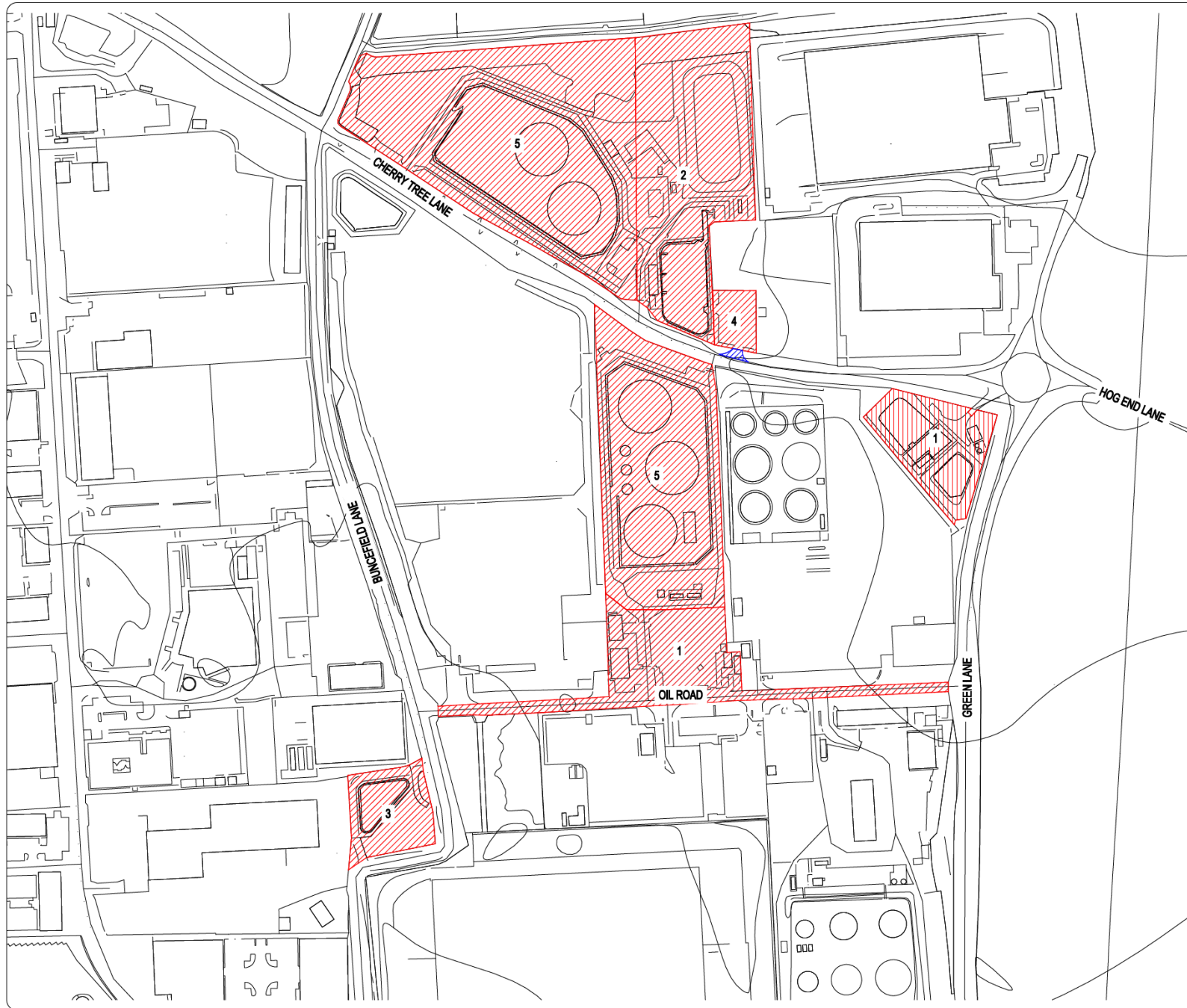
SCHEDULE 3

1. On the making of this Order, the Claimants undertake as follows:

- a) To issue and serve an Application Notice for the return date hearing on 20 April 2022;
- b) if the Court later finds that this Order has caused loss to the Defendants, and decides that the Defendants should be compensated for that loss, the Claimants will comply with any order the Court may make;
- c) to make available to any person (who has provided their name(s) and address(es) and proof of identity to the Claimants' solicitors, Fieldfisher LLP) upon written application to the Claimants' solicitors, Fieldfisher LLP (either in writing at their said offices or by email to UKOPinjunction@fieldfisher.com and in either case quoting reference OTD/UKOP, using an online file hosting service, the Court documents, witness evidence and exhibits, as soon as possible thereafter and in either case within one clear working day from the first working day on which such written application is received.

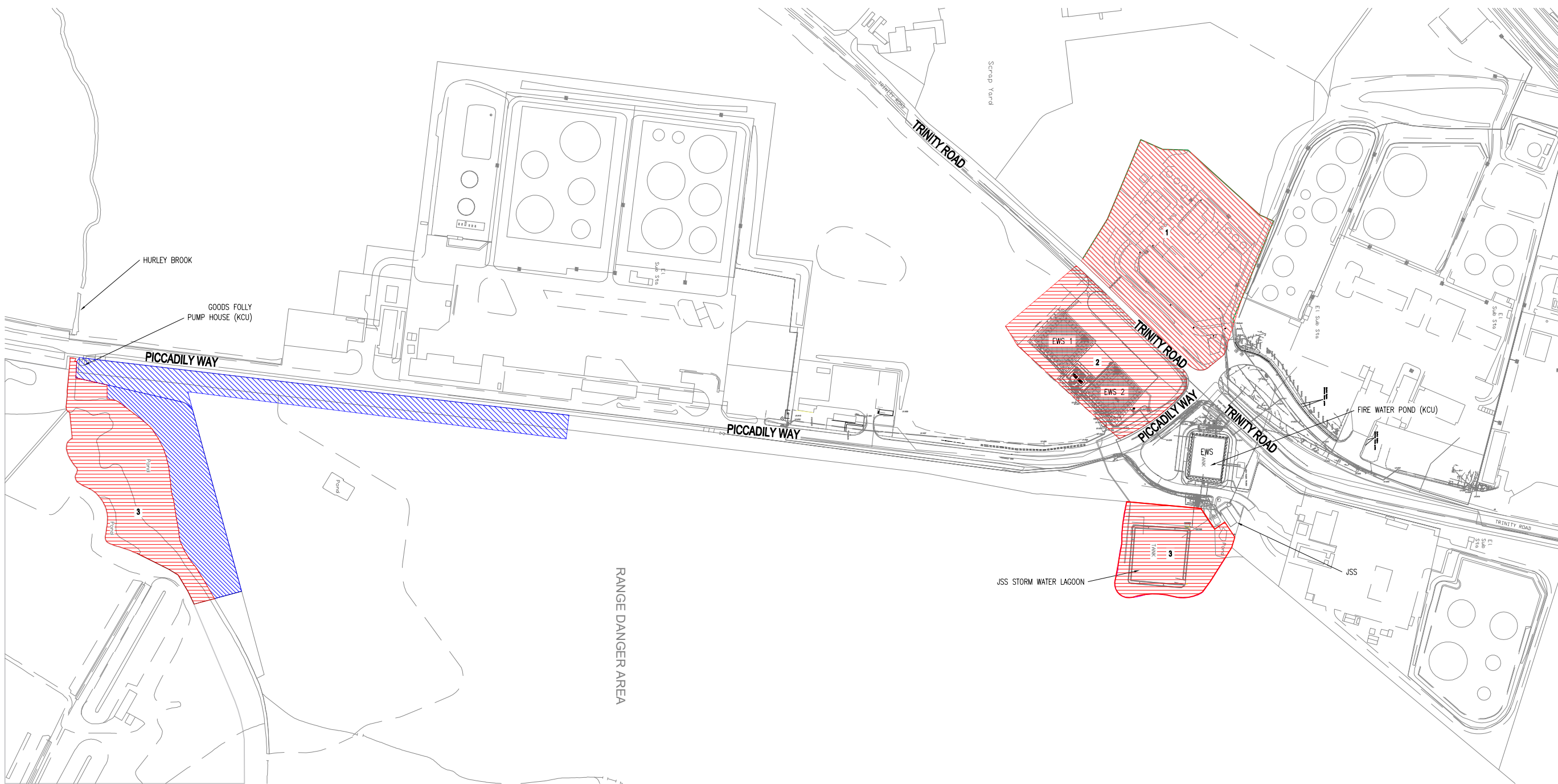
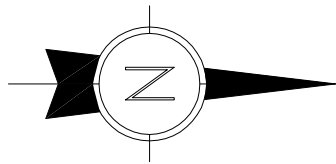
SCHEDULE 4

Plan of Buncefield (Site 1) ("**Site 1 Plan**")



SCHEDULE 5

Plan of Kingsbury (Site 2) ("**Site 2 Plan**")



SCHEDULE 6

SEE ATTACHED NOTICE AND SERVICE OF ORDER OF THE SITE 1 INJUNCTION

HIGH COURT INJUNCTION IN FORCE

NOTICE OF HIGH COURT ORDER DATED 8 April 2022

TO: PERSONS UNKNOWN ACTING IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN AND/OR THE JUST STOP OIL CAMPAIGN AND AS MORE PARTICULARLY DEFINED IN AND DESCRIBED AS THE FIRST DEFENDANT OR THE SECOND DEFENDANT IN THE ORDER (THE "DEFENDANTS")

FROM: (1) UNITED KINGDOM OIL PIPELINES LIMITED AND (2) WEST LONDON PIPELINE AND STORAGE LIMITED (THE "CLAIMANTS")

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

IT IS ORDERED THAT, UNTIL THE DETERMINATION OF A FURTHER HEARING ON 20 APRIL 2022 (THE "RETURN DATE"), THIS INJUNCTION PROHIBITS THE DEFENDANTS FROM:

- ENTERING OR REMAINING UPON THE LAND SHADED RED ON THE PLAN SET OUT IN THIS NOTICE (THE "PLAN") OR FROM CAUSING DAMAGE TO, OR REMOVING EQUIPMENT FROM THE LAND SHADED RED ON THE PLAN WITHOUT THE CONSENT OF THE CLAIMANTS; AND
- OBSTRUCTING OR OTHERWISE INTERFERING WITH THE FIRST CLAIMANT'S ACCESS OVER THE PRIVATE ACCESS ROAD (SHADED BLUE) AND WHICH ADJOINS THE LAND SHADED RED, FOR ACCESS AND EGRESS BETWEEN THE LAND SHADED RED AND THE PUBLIC HIGHWAY.

THIS MEANS THAT YOU MUST NOT GO BEYOND THIS NOTICE AND ENTER THIS SITE WITHOUT PERMISSION.

THIS ALSO MEANS THAT YOU MUST NOT OBSTRUCT OR OTHERWISE INTERFERE WITH THE FIRST CLAIMANT'S ACCESS OVER THE ACCESS ROAD SHADED BLUE. IF YOU DO, YOU MAY BE SENT TO PRISON OR HAVE YOUR ASSETS SEIZED.

REFERENCES TO THE 'CLAIMANT' OR 'CLAIMANTS' IN THIS ORDER MEANS ONE OR MORE OF THE AFOREMENTIONED CLAIMANTS AND EACH OF ITS AND THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, EMPLOYEES, PARTNERS, CONSULTANTS AND OTHER VISITORS.

Copies of the Court Order and other documents in the proceedings may be viewed at: <https://ukop.azurewebsites.net>

The Order will be further considered on the Return Date.

Claimants' solicitors: Fieldfisher LLP whose address is Riverbank House, 2 Swan Lane, London EC4R 3TT (Telephone number: 0207 861 4000; email address: UKOPinjunction@fieldfisher.com)

The Claimants will make available to any person (who has provided their name(s), address(es) and proof of identity to the Claimants' solicitors) upon written application to the Claimants' solicitors (either in writing at their said offices or by email to UKOPinjunction@fieldfisher.com) and in either case quoting reference OTD/UKOP), using an online file hosting service, the Court documents, witness evidence and exhibits, as soon as possible thereafter and in either case within one clear working day from the first working day on which such written application is received.

Court communications: all communications about this Order should be sent to the Court Manager, High Court of Justice (details found at <https://www.find-court-tribunal.service.gov.uk/courts/rolls-building-business-and-property-courts-of-england-wales>)



The freehold land at:

- Land and buildings on the south side of Cherry Tree Lane, Hemel Hempstead which is registered at the Land Registry under title number HD485114 and marked 1 on the plan above;
- Land to the north of Cherry Tree Lane, Hemel Hempstead which is registered at the Land Registry under title number HD485115 and marked 2 on the plan above;
- Land on the west side of Buncefield Lane, Hemel Hempstead which is registered at the Land Registry under title number HD485116 and marked 3 on the plan above;
- Land on the north east and south west side of Three Cherry Trees Lane, Hemel Hempstead registered at the Land Registry under title number HD485118 and marked 5 on the plan above

The leasehold land at:

- land on the north side of Cherry Tree Lane, Hemel Hempstead, as more particularly described by a lease dated 23 September 2013 made between (1) Total UK Limited and (2) United Oil Kingdom Pipelines Limited which is registered at the Land Registry under title number HD529733 and marked 4 on the plan above

SCHEDULE 7

SEE ATTACHED NOTICE AND SERVICE OF ORDER OF THE SITE 2 INJUNCTION

HIGH COURT INJUNCTION IN FORCE

NOTICE OF HIGH COURT ORDER DATED 8 April 2022

TO: PERSONS UNKNOWN ACTING IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN AND/OR THE JUST STOP OIL CAMPAIGN AND AS MORE PARTICULARLY DEFINED IN AND DESCRIBED AS THE FIRST DEFENDANT OR THE SECOND DEFENDANT IN THE ORDER (THE "DEFENDANTS")

FROM: (1) UNITED KINGDOM OIL PIPELINES LIMITED AND (2) WEST LONDON PIPELINE AND STORAGE LIMITED (THE "CLAIMANTS")

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

IT IS ORDERED THAT, UNTIL THE DETERMINATION OF A FURTHER HEARING ON 20 APRIL 2022 (THE "RETURN DATE"), THIS INJUNCTION PROHIBITS THE DEFENDANTS FROM:

- ENTERING OR REMAINING UPON THE LAND SHADED RED ON THE PLAN SET OUT IN THIS NOTICE (THE "PLAN") OR FROM CAUSING DAMAGE TO, OR REMOVING EQUIPMENT FROM THE LAND SHADED RED ON THE PLAN WITHOUT THE CONSENT OF THE CLAIMANTS; AND
- OBSTRUCTING OR OTHERWISE INTERFERING WITH THE FIRST CLAIMANT'S ACCESS OVER THE PRIVATE ACCESS ROAD (SHADED BLUE) AND WHICH ADJOINS THE LAND SHADED RED, FOR ACCESS AND EGRESS BETWEEN THE LAND SHADED RED AND THE PUBLIC HIGHWAY.

THIS MEANS THAT YOU MUST NOT GO BEYOND THIS NOTICE AND ENTER THIS SITE WITHOUT PERMISSION.

THIS ALSO MEANS THAT YOU MUST NOT OBSTRUCT OR OTHERWISE INTERFERE WITH THE FIRST CLAIMANT'S ACCESS OVER THE ACCESS ROAD SHADED BLUE. IF YOU DO, YOU MAY BE SENT TO PRISON OR HAVE YOUR ASSETS SEIZED.

REFERENCES TO THE 'CLAIMANT' OR 'CLAIMANTS' IN THIS ORDER MEANS ONE OR MORE OF THE AFOREMENTIONED CLAIMANTS AND EACH OF ITS AND THEIR AGENTS, SERVANTS, CONTRACTORS, SUB-CONTRACTORS, GROUP COMPANIES, LICENSEES, EMPLOYEES, PARTNERS, CONSULTANTS AND OTHER VISITORS.

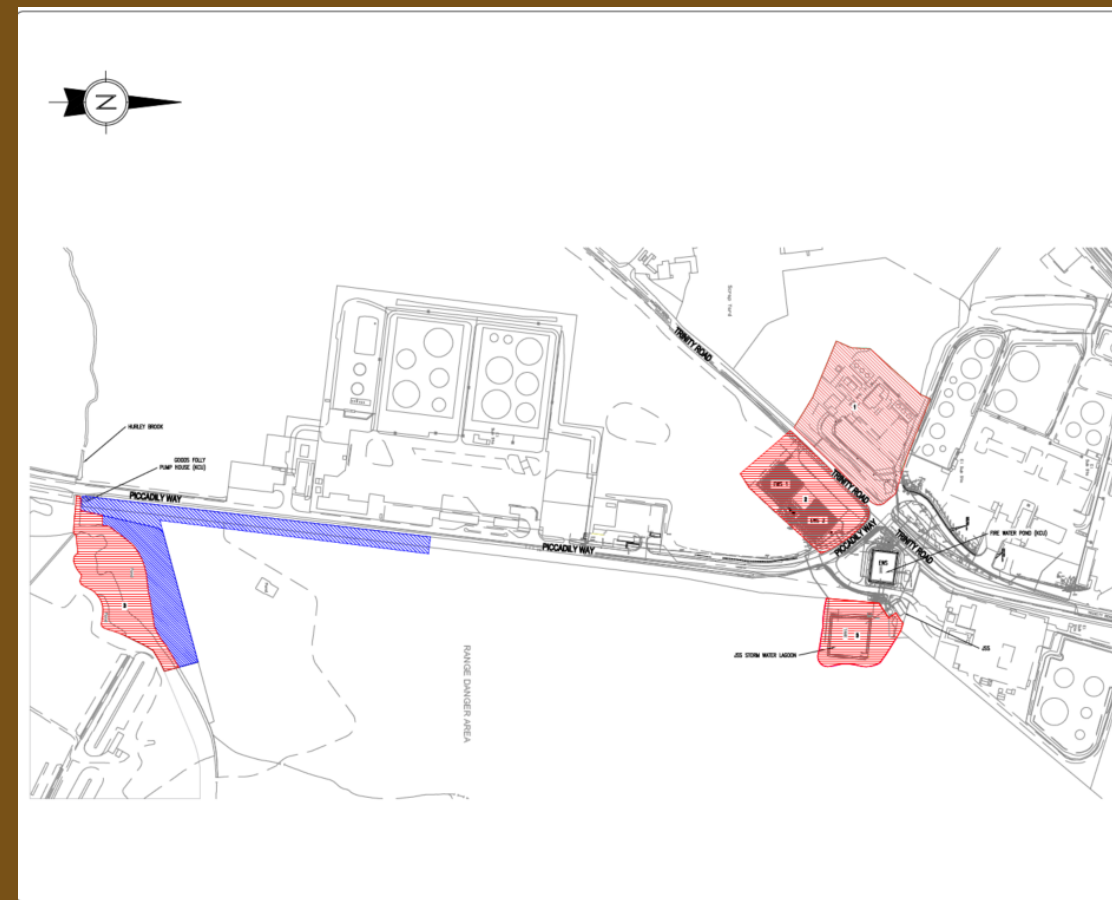
Copies of the Court Order and other documents in the proceedings may be viewed at: <https://ukop.azurewebsites.net>

The Order will be further considered on the Return Date.

Claimants' solicitors: Fieldfisher LLP whose address is Riverbank House, 2 Swan Lane, London EC4R 3TT (Telephone number: 0207 861 4000; email address: UKOPinjunction@fieldfisher.com)

The Claimants will make available to any person (who has provided their name(s), address(es) and proof of identity to the Claimants' solicitors) upon written application to the Claimants' solicitors (either in writing at their said offices or by email to UKOPinjunction@fieldfisher.com) and in either case quoting reference OTD/UKOP), using an online file hosting service, the Court documents, witness evidence and exhibits, as soon as possible thereafter and in either case within one clear working day from the first working day on which such written application is received.

Court communications: all communications about this Order should be sent to the Court Manager, High Court of Justice (details found at <https://www.find-court-tribunal.service.gov.uk/courts/rolls-building-business-and-property-courts-of-england-wales>)



The freehold land at:

- All that piece of land at Kingsbury in the County of Warwick comprising 4.96 acres or thereabouts as more particularly described by a conveyance dated 31 March 1967 and made between (1) Shell-Mex and B.P. Limited and (2) United Oil Kingdom Pipelines Limited and marked 1 on the plan above; and
- Land on the south-east side of Trinity Road, Kingsbury, Tamworth which is registered at the Land Registry under title number WK468465 and marked 2 on the plan above;

The leasehold land at:

- land at Kingsbury in the County of Warwick, as more particularly described in a lease dated 11 March 2021 made between (1) The Secretary of State for Defence and (2) United Oil Kingdom Pipelines Limited and marked 3 on the plan above.

Certificate of service

On what day did you serve?	1	4	/	0	4	/	2	0	2	2
The date of service is	1	9	/	0	4	/	2	0	2	2

Name of court HIGH COURT OF JUSTICE, BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES, CHANCERY DIVISION PROPERTY TRUST AND PROBATE LIST	Claim No. PT-2022-000303
--	------------------------------------

Name of Claimant (1) UNITED KINGDOM OIL PIPELINES LIMITED (2) WEST LONDON PIPELINE AND STORAGE LIMITED

Name of Defendant (1) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT CONSENT, AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN, ON LAND AND BUILDINGS AT AND COMPRISING PART OF (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED RED ON THE SITE 1 PLAN ATTACHED TO THE CLAIM FORM) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE (SHOWN FOR IDENTIFICATION SHADED RED ON THE SITE 2 PLAN ATTACHED TO THE CLAIM FORM) (2) PERSONS UNKNOWN WITHOUT CONSENT, AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN, OBSTRUCTING OR INTERFERING WITH THE FIRST CLAIMANT'S ACCESS OVER PRIVATE ACCESS ROADS ADJACENT TO (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION SHADED BLUE ON THE SITE 1 PLAN ATTACHED TO THE CLAIM FORM) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE (SHOWN FOR IDENTIFICATION SHADED BLUE ON THE SITE 2 PLAN ATTACHED TO THE CLAIM FORM)
--

What documents did you serve?

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

- (a) Second Witness Statement of Daniel Owen Christopher Talfan Davies together with Exhibit UKOP4
 - (b) Second Witness Statement of John Michael Armstrong together with Exhibit UKOP5
 - (a) and (b) together hereon referred to as the "**Second Witness Statements of OTD and JA**"
 - (c) Bundle for use at Return Date Hearing on 20 April 2022 (the "**Bundle**")
 - (d) Claimants' Skeleton Argument ("**Skeleton Argument**")
- The First and Second Defendants.

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)

1. Service was effected at the Sites (as more particularly
--

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

Service was effected: (a) at the Sites, as more particularly described in Schedule 2 of the Order, and as shown shaded red on the plan annexed to Schedule 4 and Schedule 5 of the Order; (b) on the web link specified in paragraph 13(b) of the Order (https://ukop.azurewebsites.net); (c) at the email addresses specified in paragraph 13(d) of the Order (xr-legal@riseup.net and jststopoil@protonmail.co.uk); and (d) at the additional email addresses listed below:
--

described in Schedule 2 of the Order of Mr Peter Knox QC dated 8 April 2022 (the "**Order**"), and as shown shaded red on the plan annexed to Schedule 4 and Schedule 5 of the Order) by the First Claimant and its appointed agents:

(a) in respect of Site 1, at 4.37pm and 4.42pm on 14 April 2022, by placing copies of the Second Witness Statements of OTD and JA (contained within the Bundle) the Bundle itself and the Skeleton Argument in clear transparent sealed containers at two prominent locations on the perimeter of Site 1. Photographs of the container appear at **Appendix 1** to this certificate of service.

(b) in respect of Site 2, at 4.26pm on 14 April 2022, by placing copies of the Second Witness Statements of OTD and JA within the Bundle, the Bundle itself and the Skeleton Argument in clear transparent sealed containers at two prominent locations on the perimeter of Site 2. Photographs of the container appear at **Appendix 2** to this certificate of service.

2. Service was further effected on 14 April 2022, by uploading the Second Witness Statements of OTD and JA (contained within the Bundle) the Bundle itself and the Skeleton Argument to <https://ukop.azurewebsites.net>. A copy of the web link page is at **Appendix 3** to this certificate of service.

3. Service was further effected on 14 April 2022 by an email being sent at 4.28pm to xr-legal@riseup.net and at 4.28pm to juststopoil@protonmail.co.uk, juststopoil@protonmail.com and juststopoilpress@protonmail.com stating that copies of the Second Witness Statements of OTD and JA (contained within the Bundle), the Bundle itself and the Skeleton Argument could be viewed at <https://ukop.azurewebsites.net>. Copies of the emails are at **Appendix 4** to this certificate of service.

juststopoil@protonmail.com; and
juststopoilpress@protonmail.com

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 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)

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 DANIEL OWEN CHRISTOPHER TALFAN DAVIES

Signed



(Claimant) (Defendant) ('s solicitor) ('s litigation friend)

Position
or office
held

Partner

(If signing on behalf of firm or

Date

1	9	0	4	2	0	2	2
---	---	---	---	---	---	---	---

company)

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).

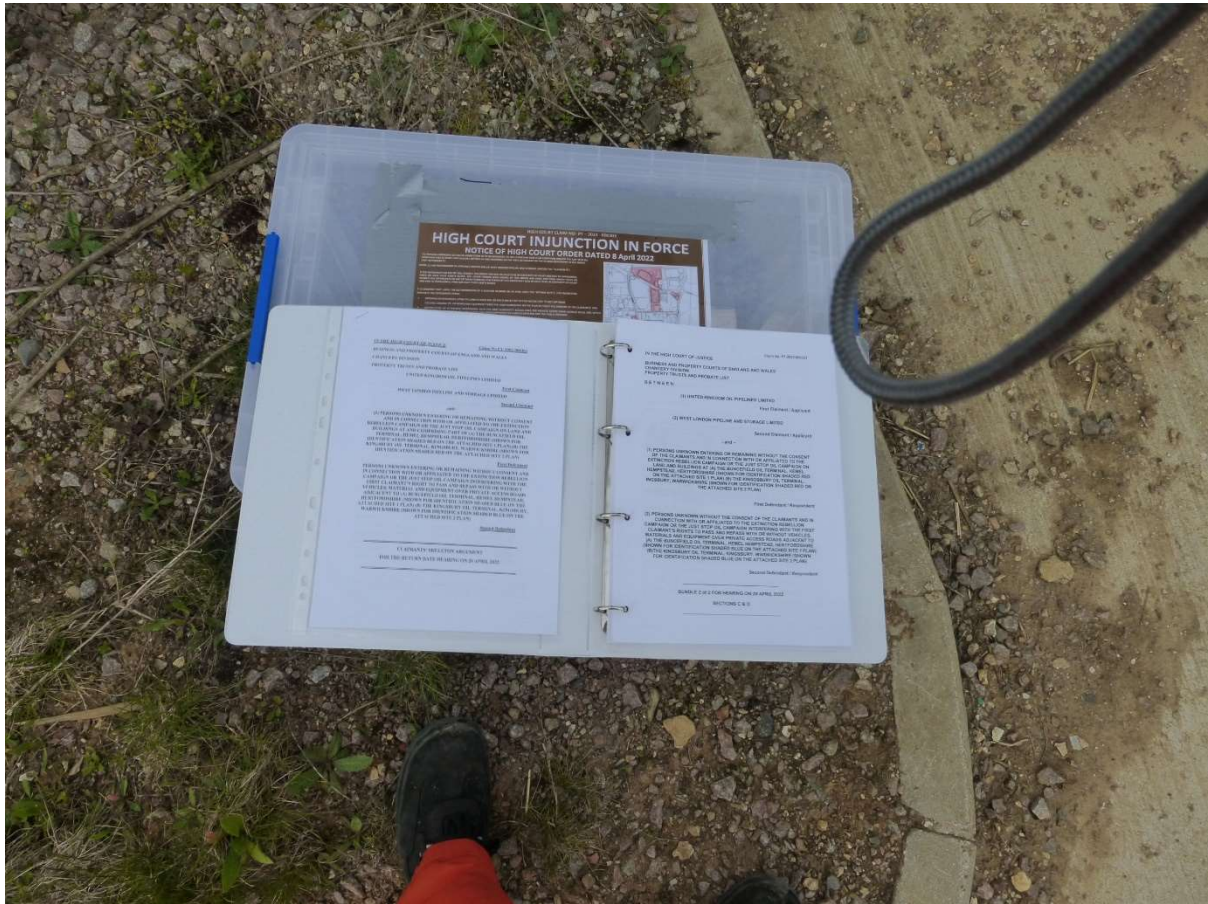
Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

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

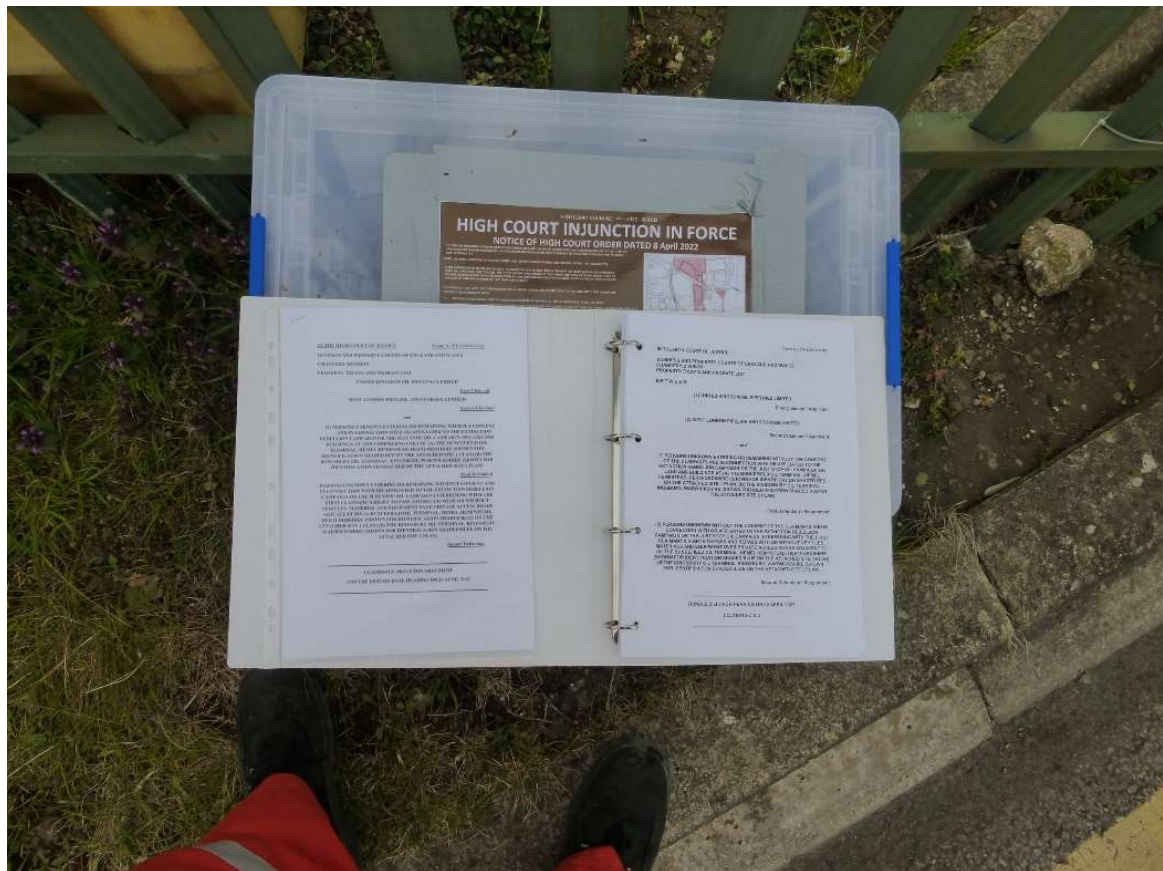
In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

APPENDIX 1

Site 1: Main entrance to Cherry Tree Farm – 4.37pm on 14 April 2022



Site 1: East entrance of Oil Road – 4.42pm on 14 April 2022



APPENDIX 2

Site 2: 4.26pm on 14 April 2022



APPENDIX 3

ukop.azurewebsites.net - /

4/13/2022 10:01 AM	270368	(2022.04.08) Final Note from Injunction Hearing dated 08 April 2022 - 103362492_1.PDF
4/8/2022 8:44 PM	83721602	Bundle 1 of 2 for Return Date Hearing on 20 April 2022 (comprising the Bundle for Interim Injunction Hearing on 8 April 2022) - 103273893
4/14/2022 4:01 PM	82455854	Bundle 2 of 2 for Return Date Hearing on 20 April 2022.pdf
4/14/2022 4:00 PM	389745	Claimant's skeleton argument for return date hearing on 20.4.2022.pdf
4/8/2022 8:45 PM	887760	Defendant Response Pack - 103297040_1.pdf
4/8/2022 8:28 PM	1061012	Draft Order for Return Date Hearing (08.04.2022) - 103296915_1.DOCX
4/8/2022 8:28 PM	4712019	First Witness Statement of Daniel Owen Christopher Talfan Davies dated 8 April 2022 together with Exhibit UKOP3 - 103279742_1.PDF
4/8/2022 8:28 PM	991217	PT-2022-000303 - Application Notice for Interim Injunction Hearing dated 7 April 2022 - 103296911_1.PDF
4/11/2022 4:10 PM	127841	PT-2022-000303 - Sealed Application Notice - Return Date - 08.04.2022 - 103313587_1.PDF
4/11/2022 4:10 PM	1141844	PT-2022-000303 - Sealed Claim Form - without rider - 11.04.2022 - 103313439_1.PDF
4/12/2022 11:38 AM	3631509	Sealed Order dated 8 April 2022 in relation to interim injunction hearing - 103338343_1.PDF
4/14/2022 3:18 PM	152	web.config

APPENDIX 4

Fiona Sellers

From: Owen Talfan Davies
Sent: 14 April 2022 16:28
To: juststopoil@protonmail.co.uk; juststopoil@protonmail.com;
juststopoilpress@protonmail.com
Cc: UKOP injunction
Subject: RE: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]
Attachments: fieldfisher.inj.returnskel.final (with 08.04.2022 Skeleton attached).pdf
GuidEmailIdProperty: f86d7861-b57b-408b-8a00-86c357e5324f

Dear Just Stop Oil,

We refer to our recent correspondence, set out below.

As you are aware, we act on behalf of (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited (the "**Claimants**") in respect of the Claimants' recent application for injunctive relief. We refer to the order of Mr Peter Knox QC dated Friday 8 April 2022 (the "**Order**"), a copy of which was provided to you via weblink on Wednesday 13 April 2022, which provides, amongst other things, for a return date hearing on 20 April 2022 (the "**Return Date**"), and permission to the Claimants to file and serve any further evidence by 4.30 pm on Thursday 14 April 2022.

We are emailing to inform you that the Claimants' further evidence, together with the additional court documents for use at the Return Date, may now be viewed at the following weblink:

<https://ukop.azurewebsites.net>

The new documents can be located in sections C and D of the 'Bundle for use at the Hearing on 20 April 2022' and comprise the following:

- Application Notice for Return Date;
- Sealed Claim Form;
- Draft Order for Return Date;
- First and Second Witness Statements of Daniel Owen Christopher Talfan Davies;
- Certificate of Service relating to service of Order dated 8 April 2022;
- Second Witness Statement of John Michael Armstrong;
- Draft Order for Return Date (updated, and with comparite and proposed site notices); and
- Exhibits UKOP3, UKOP4 and UKOP5;

As stated in our email of 13 April below, the Order also grants permission for any individual who wishes to come forward to defend the proceedings to serve any evidence **by 4.30pm on Tuesday, 19 April 2022.** We are authorised to accept service for and on behalf of the Claimants and confirm that service of any evidence can be effected by emailing the relevant documents to the following email address:

UKOPinjunction@fieldfisher.com

We attach to this email a copy of the Claimants' skeleton argument in relation to the Return Date, a copy of which has also been added to the weblink referred to above. Any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument. We confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to the email address specified above.

For the avoidance of any doubt, if you wish to serve on us any evidence and/or a skeleton argument, you should also ensure that a copy of each of those documents should also be filed at the Court.

Yours faithfully,

Owen Talfan Davies

Partner

D: +44 330 460 6961

M: +44 7711 088057

fieldfisher



Fiona Sellers

From: Owen Talfan Davies
Sent: 14 April 2022 16:28
To: xr-legal@riseup.net
Cc: UKOP injunction
Subject: RE: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Dear Extinction Rebellion,

We refer to our recent correspondence, set out below.

As you are aware, we act on behalf of (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited (the "**Claimants**") in respect of the Claimants' recent application for injunctive relief. We refer to the order of Mr Peter Knox QC dated Friday 8 April 2022 (the "**Order**"), a copy of which was provided to you via weblink on Wednesday 13 April 2022, which provides, amongst other things, for a return date hearing on 20 April 2022 (the "**Return Date**"), and permission to the Claimants to file and serve any further evidence by 4.30 pm on Thursday 14 April 2022.

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- Certificate of Service relating to service of Order dated 8 April 2022;
- Second Witness Statement of John Michael Armstrong;
- Draft Order for Return Date (updated, and with comparative and proposed site notices); [and](#)
- Exhibits UKOP3, UKOP4 and UKOP5;

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UKOPinjunction@fieldfisher.com

We attach to this email a copy of the Claimants' skeleton argument in relation to the Return Date, a copy of which has also been added to the weblink referred to above. Any individual who wishes to come forward to defend the proceedings is entitled to serve a skeleton argument. We confirm that service of any skeleton argument can be effected on the Claimants by emailing the relevant document to the email address specified above.

For the avoidance of any doubt, if you wish to serve on us any evidence and/or a skeleton argument, you should also ensure that a copy of those documents are also filed at the Court.

Yours faithfully,

**UNITED KINGDOM OIL PIPELINES LIMITED AND WEST LONDON PIPELINE AND
STORAGE LIMITED**

V PERSONS UNKNOWN

**CLAIMANTS' SOLICITORS NOTE OF HEARING AND JUDGMENT OF PETER KNOX
QC SITTING AS A DEPUTY JUDGE OF THE CHANCERY DIVISION**

DATED 8 APRIL 2022

This note has not been produced, issued or approved by the High Court. This note has been produced on the direction of Peter Knox QC sitting as a Deputy Judge of the Chancery Division and constitutes the Claimants' solicitors' note of the hearing of an interim injunction application that was heard by the High Court on 8 April 2022.

Katharine Holland QC and Yaaser Vanderman appeared for the Claimants.

1. The Hearing

- 1.1 The Judge confirmed that he had read the Claimants' Skeleton. He confirmed that he had read both witness statements of Mr Davis and Mr Armstrong.
- 1.2 Leading Counsel for the Claimants confirmed that she had provided the Judge with the following documents in addition:
 - (a) The updated draft Order;
 - (b) A third witness statement of the instructing solicitors; and
 - (c) the Notices that are the missing Schedules in the draft Order
- 1.3 Leading Counsel confirmed that notice of the Hearing was communicated to Extinction Rebellion and Just Stop Oil via email at 6.27am and 6.28am that day and details of the notice given were provided in the witness statement of the instructing solicitors. Leading Counsel confirmed that UKOP3 was the exhibit to the instructing solicitors' witness statement comprising the emails giving notice.
- 1.4 The Judge's clerk confirmed that no Persons Unknown were waiting outside the Court.
- 1.5 Leading Counsel proceeded to take the Judge through the title issues and confirmed that the interests in Site 1 were summarised at paragraph 2.3 of the Skeleton. It was confirmed that the First Claimant is the registered proprietor of three registered freehold titles, the registered proprietor of one leasehold title and also has a leasehold right of way over a private access route. The Second Claimant is the registered proprietor of a further freehold title. Details are set out in paragraphs 24 to 28 of the Witness Statement of Peter Malcolm Davis dated 7 April 2022 at Section B, page 31 of the bundle.

- 1.6 Leading Counsel referred the Judge to the official copies of the title registers of those interests at Section B, page 6, Section B, page 11, Section B, page 16 and Section B, page 20 of the bundle and confirmed that details in relation to the right of way were at page 26 and page 42 of the bundle. The Second Claimant's freehold title is at page 116, which is another parcel of land in Site 1. Leading Counsel confirmed that this is set out at paragraph 24 of Mr Davis' Witness Statement.
- 1.7 Leading Counsel referred the Judge to page 6 of the new draft Order, where Site 1 is shaded red. It was confirmed in response to the Judge's query that this plan is of the entirety of the Buncefield interest and within the site, the various plots within the Claimants' ownership are numbered.
- 1.8 Leading Counsel confirmed in response to the Judge's query that the main entrance to Site 1 is off Green Lane and that this is where activity had taken place.
- 1.9 Leading Counsel confirmed in response to the Judge's query that there had been a number of arrests made that day at Kingsbury but that she did not have an update in relation to Buncefield, however, Mr Armstrong's statement was up to date as of the previous night.
- 1.10 Leading Counsel confirmed that the main entrance was at Green Lane and the entrance at the other side was closed off. Leading Counsel confirmed that the Claimant are only seeking injunctive relief in relation to the enclosed plot of land and not relief for anything related to the public highways.
- 1.11 Leading Counsel confirmed in response to the Judge's query that Oil Road was a private road within the freehold interest of the First Claimant and that is why it is shaded in red. The Judge was referred to paragraphs 24 - 28 of Mr Davis' statement (Section A, page 31 of the Bundle), for a description of the site access road and it was confirmed that the Site 1 Access Route, as defined, was coloured blue on the Site 1 Plan.
- 1.12 The Judge queried the relevance of the Site 1 Access Route and Leading Counsel submitted that what was of concern was that the apprehended risks in relation to other areas of the plan apply equally to areas including the site access.
- 1.13 Leading Counsel confirmed in response to the Judge's query that so far there had been no problems in relation to the land coloured blue on the Site 1 Plan but that protection was sought to avoid access to the public highway being blocked. Leading Counsel referred the Judge in response to the Judge's query to the access to the M1 on the Site 1 Plan and confirmed the route taken by tankers from the site.
- 1.14 In relation to the Kingsbury site (site 2), Leading Counsel confirmed a correction to the Skeleton, on the third line of paragraph 2.6 at page 3. The reference should simply be to the proprietor of the leasehold title awaiting registration.
- 1.15 Leading Counsel confirmed that the conveyance for the unregistered Warwickshire title, which is referenced at the beginning of paragraph 2.6 of the Skeleton can be found in Section B, page 129 of the bundle. The Judge was referred to Section B, page 135 of the bundle for the office copy entry for the registered freehold title owned by the First Claimant and to Section B, page 146 for the lease that is awaiting registration at the Land Registry. The leasehold right of way can be found in paragraph 2 of Section B, page 154 of the bundle.
- 1.16 Leading Counsel confirmed in response to the Judge's query that at the time of grant of this leasehold interest it would be known that the land was intended for this use.
- 1.17 The Judge was referred to the private access route on the Site 2 Plan shaded blue. The Judge was also referred to Section A, page 30 of the bundle which provides a description of the site and to Section A, page 32 on paragraph 33 which describes the access route.

- 1.18 Leading Counsel confirmed in response to the Judge's query that Section A, page 34, paragraph 47 of Mr Davis' Witness Statement confirms that the main access to site 2 is via Piccadilly Way which then leads on to the private access road serving the main site and terminal facilities in the north of site.
- 1.19 Leading Counsel confirmed in response to the Judge's query that the parcel of land numbered 3 is described at Section A, page 33 at paragraph 46 of Mr Davis' Witness Statement.
- 1.20 Leading Counsel confirmed in response to the Judge's query that the activity complained of taking place at Kingsbury was within the oil terminals themselves and within the public highways, there had been no actual trespassers within the boundaries of the site.
- 1.21 Leading Counsel referred the Judge to Section A, page 30, at paragraph 20 for a description of the site and confirmed that the land numbered 2 was fire ponds to deal with the risk of fires and site 3 comprised a water lagoon and a fire pond.
- 1.22 Leading Counsel confirmed in response to the Judge's query that the activity of the campaigners had occurred in the terminal areas; trespassing on adjacent sites and activity at public highways even though entry to Site 2 had not been obtained. It was confirmed in response to the Judge's query that the concern was that the individuals in question would move away from the current areas and to the central control area marked 1 on Site 2.
- 1.23 Leading Counsel referred the Judge to the evidence in relation to Kingsbury Site 2 as referred to in Mr Armstrong's Witness Statement where events are set out. Mr Armstrong describes the issues relating to the Kingsbury site at paragraphs 21 - 42 of his statement. In those paragraphs he sets out where the risks arise in relation to those areas. Furthermore, details of direct action are from page 44 onwards.
- 1.24 Leading Counsel confirmed that individuals had been blocking the main entrance and confirmed in response to the Judge's query as to where the main entrance was, that this was where Piccadilly Way meets Trinity Road and referred the Judge to photographs at Section B, pages 257 - 272. Page 257 was referenced in order to show the entrance where activity had taken place. Leading Counsel confirmed that the photograph in Section B, page 262 is described as being "near Kingsbury Oil Terminal" which applies to the land which the Claimants have an interest in.
- 1.25 The Judge stated that his impression was that the reference to Kingsbury Oil Terminal was being used not to refer to the Claimants' plots of land, but the place where the tankers are.
- 1.26 Leading Counsel submitted that the individuals were near the vicinity of the Claimants' land and that the activities of the campaigners relates to the site as a whole including the Claimants' interest. The Judge was referred to Section B, page 286 for a photograph of the activities at the site. Leading Counsel confirmed in response to the Judge's query that most of the photographs were from newspaper articles, the one at 286 being from the Mail Online (from page 279 onwards).
- 1.27 The Judge referred to many of the photographs having copyright Extinction Rebellion and Just Stop Oil on them suggesting that they had been taken by individuals of those groups and then provided to the press for the benefit of their campaigns.
- 1.28 The Judge was referred to page 279 of the bundle and to the headline of that article which refers to "*critical oil facilities at Kingsbury terminal*" and Leading Counsel submitted that this was the sort of evidence that proves that there is general disruption to the facility and not in one specific area in relation to tankers. Leading Counsel also submitted that this evidence also suggests the actions of the campaigners relate to all facilities in relation to oil sites.

- 1.29 The Judge stated that what appeared to be happening is that the campaigners were not trespassing at any relevant land but instead were causing a nuisance to the oil terminal as opposed to causing a nuisance at the particular plots of land owned by the Claimants.
- 1.30 Leading Counsel indicated that this was a site with different titles but submitted that the whole site was at risk due to the activities. Leading Counsel also submitted that the Claimants' facilities were fundamental to the pipeline and just as much at risk as the campaigners were not distinguishing between areas, meaning that the whole site was at risk.
- 1.31 The Judge indicated that this may be a matter of how the order is phrased and what the defendants are prevented from doing. He requested the evidence that showed that by causing trouble and being a nuisance to the main depot, the campaigners were jeopardising or potentially jeopardising the operations carried out by the Claimants at their sites.
- 1.32 Leading Counsel submitted that there was a conglomeration of evidence of the campaigns causing disruption to the oil industry and that whilst blocking tankers may not affect the operations of terminal, the campaigners are not just trying to stop tankers, they are also presenting risks to infrastructure. Leading Counsel submitted it would be useful to look at the totality of the activities to show the kind of activity that presents a risk to all sites.
- 1.33 The Judge stated that there was evidence of trespass in relation to Buncefield Site 1 but he wished to be told about how the activities carried out by Extinction Rebellion at Kingsbury Site 2 were causing or likely to cause risks at the particular sites which the Claimants control.
- 1.34 Leading Counsel referred the Judge to the following evidence of disruption:
- (a) Last Friday there was the prevention of oil tankers from leaving the site at Kingsbury;
 - (b) by 3 April 2022, there were 54 arrests;
 - (c) Section A, page 44 at paragraph 45 set out these events in detail including: *"on 5 April 2022, 20 activists from Just Stop Oil again blocked the entrance to the terminal by sitting in the road with banners at the gate which they said was causing tankers to be turned away. The group claimed that five people had been arrested, whilst those remaining were either glued to the road or locked on – and a roadblock was also established on a tanker route to and from the terminal near Junction 9 on the M42. Warwickshire Police said that a total of eight activists had been arrested, bringing the total across the 10 sites affected to 283 pages 279-288 of UKOP2 in the bundle; and*
 - (d) *on 7 April 2022, Just Stop Oil tweeted that from 00:40am on 7 April 2022 there were supporters of Just Stop Oil blocking the entrance to Site 2. They also claimed that they had protestors inside the Kingsbury oil terminal (but which does not comprise part of Site 2), and that they 'seem to have free rein of this place' pages 289-291 of UKOP2 in the bundle."*
- 1.35 The Judge queried how the Claimants' sites were affected by the actions when the Claimants were not the owner of the oil tankers / depot.
- 1.36 Leading Counsel submitted that photographs in the evidence show that the campaigners do not distinguish between the different titles within the site – the campaigners are not just interested in terminals, they are interested in gaining access to all sorts of oil-related infrastructure. Leading Counsel submitted that the Claimants may bring a cause of action for quia timet relief which means that the Claimants would be entitled to injunctive relief based purely on a threat from campaigns in the absence of activity.

- 1.37 The Judge stated that this may assist because he did not see how stopping oil tankers from leaving the depot would cause nuisance to the Claimants' land.
- 1.38 Leading Counsel submitted that the evidence in relation to the site shows that it is not about purely disrupting oil tankers. The campaigners are willing to go further. Their movement is about stopping oil facilities at targeted sites beyond the oil terminal. Leading Counsel referred the Judge to the following references showing disruption around the site generally: in Section B, page 280, this article reports on how the campaigners bolt tunnels "*at the Navigator Oil terminal*" in Essex; Section B, page 281 shows campaigners at another location at Kingsbury Oil Terminal; Section B, page 286, shows another photo in the vicinity of the site including the Claimants' properties; and Section B, page 289, shows individuals within the actual facilities on 7 April 2022.
- 1.39 Leading Counsel submitted that the evidence shows that in addition to blocking tankers, the campaigners are gaining access into the actual facilities. So their activities do risk disrupting the activities of the Claimants. The Judge was referred to the tweet of Just Stop Oil in which they state "*we seem to have free reign of the place.*" In response to the Judge's query, Leading Counsel confirmed that the Navigator terminal was a completely different site and the claim was essentially that whilst the campaigners may have gone for tankers so far, that doesn't mean that they will stop at that.
- 1.40 The Judge requested examples demonstrating that the activities of those involved in direct action are declaring an intention to cause nuisance. Leading Counsel referred the Judge to the extracts in Section A of the bundle at page 44, paragraph 46. The Judge noted the proximity of the date and that there was a blockade that day in Tower Bridge.
- 1.41 Leading Counsel referred the Judge to two specific references at Section A, page 45 of the bundle which sets out how the spokesperson for Extinction Rebellion claimed that Extinction Rebellion had "*held three locations three locations of strategic importance to the UK's energy network*" and submitted that this was demonstrative of it not just being about blocking tankers. Another example on the same page relates to how ExxonMobil had to shut down operations at Hythe, Birmingham, Purfleet and West London terminals due to direct action.
- 1.42 Leading Counsel confirmed that the incidents had occurred last Friday and that there was a reference to shutting down operations. The Judge was then referred to page 46 "*on 4 April 2022, it was reported that activists were planning weeks of disruption across Britain, including using a network of secret tunnels at the Navigator Oil Terminal in Thurrock and Grays oil terminals in Essex to frustrate the operations of key oil facilities*" being a reference to disruption generally by creating secret tunnels to cause disruption in key oil facilities.
- 1.43 Leading Counsel confirmed in response to the Judge's query that inferences could be drawn that as this is all effectively a campaign by Extinction Rebellion to cause maximum disruption in the very near future by whatever means they think are justified they could therefore cause disruption to the Claimants' sites because they are planning big and not limiting their activity to oil tankers.
- 1.44 Leading Counsel directed the Judge to Section A, page 42 at paragraph 43, to demonstrate the breadth of the activities and to Section B, page 195 where there is a reference to Just Stop Oil's Frequently Asked Questions as posted on their website and in which they specifically indicate, under the heading of "*What are you going to do?*", to their intention "*to take part in Non-Violent Direct Action targeting the UK's oil and gas infrastructure should the Government fail to meet our demand by 14 March 2022.*" Leading Counsel submitted that the key emphasis is that they are willing and intending to go after oil infrastructure which would extend to the activities of the Claimants.
- 1.45 Leading Counsel referred the Judge to Mr Davis' Witness Statement, in Section A, page 33 of the bundle which, at paragraph 5, sets out the significance of Site 2 in that it "*houses the central control*

centre which operates the UKOP Stanlow to Kingsbury Pipeline, the UKOP Kingsbury to Buncefield Pipeline, the UKOP Thames to Kingsbury Pipeline and the WLPSTL storage site and WLPSTL pipelines for Heathrow and Gatwick Airports providing all control and safety monitoring functions". Leading Counsel submitted that when considering this matter, the Court may be mindful of considering the risk to the Claimants' properties with reference to the gravity of the consequences if disruption were to occur.

- 1.46 The Judge queried whether there were pipelines at Site 2 in relation to which Leading Counsel confirmed that there were pipelines feeding the terminal and Section A, page 41, paragraph 35, of the bundle answers this question directly.
- 1.47 Leading Counsel referred the Judge to Section B, page 313 where there is a reference to the police warning people to avoid the areas where there is activity generally which would include the Claimants' properties.
- 1.48 The Judge indicated that there is a difference between stopping tankers and getting through and disrupting infrastructure in response to which he was referred by Leading Counsel to the top of Section B, page 334, where there is a reference to the campaigners forcing the shut down of ExxonMobil's oil operations. Leading Counsel submitted that the activity is not just about blocking tankers.
- 1.49 Leading Counsel referred the Judge to the evidence in relation to the tunnelling in Section B, pages 370 – 373 of the bundle. The Judge stated that this evidence all goes to the urgency point and that it indicated that there was a particular time that this activity will take place which is this week and this evidence is quite material for the Claimants.
- 1.50 The Judge indicated that he did not need to be addressed in relation to the law because he had read Leading Counsel's skeleton argument. Leading Counsel indicated that she wanted to cover the test which needed to be satisfied in section 12 of the Human Rights Act which the Judge confirmed would be helpful to go through. Leading Counsel indicated half an hour would be needed and the stages of the test had been addressed in the Skeleton.
- 1.51 The Judge stated that he wanted to address an issue in relation to the Defendants identified in the draft Order. He indicated that the Order seemed odd in that you have a first and a second defendant who is persons unknown but the purpose of the injunction is to affect anybody who finds out about the injunction and thus becomes liable not to breach it. The Judge queried whether this was standard wording in this type of action.
- 1.52 Leading Counsel submitted that she and Junior Counsel practiced in this area so had seen how this issue had evolved. She confirmed that there had been orders made in the last few days, particularly, 2 days ago in which Leading and Junior Counsel appeared in front of Mrs Justice Ellenbogen in the Queens Bench division and the Defendants were framed/labelled in the same way. Leading Counsel confirmed that there is no standard precedent but that is the sort of terminology that has started to be acceptable as derived from the case law.
- 1.53 In relation to the cross undertaking in damages, the Judge queried why he should assume that the Claimants are in a position to pay. Leading Counsel referred the Judge to Section A, page 57 of the bundle (the Witness Statement of Mr Armstrong) where the issue of the cross undertaking is discussed.
- 1.54 The Judge queried whether there were any accounts or evidence to demonstrate that the Claimants could meet the undertaking. Leading Counsel referred the Judge to Section A, page 29, paragraphs 12-13 of the bundle where the Claimants are described and confirmed there are no charges on any of the property titles held by the Claimants and the evidence was before the Court of the particular importance of the infrastructure which the Claimants hold.

- 1.55 Leading Counsel confirmed that in respect of section 12 of the Human Rights Act in relation to whether to grant injunctive relief, the Claimants seek to rely on both grounds; namely that:
- (a) the applicant has taken all practicable steps to notify the respondent; and
 - (b) that there are compelling reasons why the respondent should not be notified
- 1.56 Leading Counsel submitted that the Claimants had taken all practicable steps as demonstrated by the emails exhibited to the instructing solicitors' witness statement. The Judge queried whether the emails were as far as notice goes and Leading Counsel confirmed this was the case and submitted that this was all practicable steps because it wasn't known who these people were.
- 1.57 The Judge queried why the emails were not sent the previous day or why notification wasn't given of the intention to apply for an injunction before everything was ready. Leading Counsel submitted that the Claimants wanted to get everything ready and finalised before giving notice and that page 2 of UKOP3 confirmed exactly what was said by way of notice.
- 1.58 The Judge queried again why notice was not given the previous day or confirmation given of the intention to go to Court. Leading Counsel submitted that the Claimants did not know until later in the day what time the hearing would be and the test the law sets out says "*practicable*". What was practicable in this instance was for the Claimants to notify the Respondents when they were ready and when the details of the injunction application were known, so that is practicable. That test did not require the Claimants to take all practical steps.
- 1.59 The Judge queried why the Respondents should not be notified and Leading Counsel submitted that there was a fear that if it was known that the Claimants were going to Court, that the disruption would be escalated and cause even more risk to the sites. The Judge confirmed that the Claimants' submission was that the compelling reason not to notify until closer to the date and time of hearing was to avoid a flood of protestors who might have escalated direct action.
- 1.60 Leading Counsel referred the Judge to tab 6, page 48 of the bundle, paragraphs 63 - 67 and asked the Judge to read the same.
- 1.61 The Judge queried whether the steps identified at paragraph 64(c) had been carried out and Leading Counsel confirmed that this was the case.
- 1.62 The Judge queried whether the Claimants would take the point that this injunction does not affect freedom of expression as the respondents could do what they want as long as it does not impact the Claimants' private land.
- 1.63 Leading Counsel submitted that section 12(2) of the Human Rights Act – (a) and (b) are alternatives. The Claimants only need to satisfy one but on their submissions satisfy both.
- 1.64 Leading Counsel confirmed that the section 12(3) point is that the Court is being asked to find that the Claimants are likely to succeed at trial and that is why it has been put in that way at paragraph 11.2 of the Skeleton. She submitted that assuming section 12(3) arises at a final trial, the Court is being asked to find that quia timet relief is likely to be granted.
- 1.65 The Judge queried whether section 12(3) is the position generally to which Leading Counsel confirmed that it was and that there were some references to it in cases in the bundle of authorities.
- 1.66 The Judge made a number of comments in relation to the draft Order. He stated that the reference to Defendant should be plural and queried whether the Order contained interpretation wording as to the meaning of defendant in relation to which he was referred by Leading Counsel to paragraph 11 of the draft Order.

- 1.67 Leading Counsel confirmed that the names of Leading Counsel and Junior Counsel would need to be inserted into the recitals.
- 1.68 The Judge stated that in a persons unknown case, you would expect a clause that would say people who know about this Order will be liable to comply and that if a member of Extinction Rebellion committed trespass and did not know of the Order, they could not be in breach. Leading Counsel submitted that that individual would know about the Order because there is a deemed method of service.
- 1.69 It was agreed that the third witness statement (of the instructing solicitors) needed to be added to schedule 1.
- 1.70 The Judge was invited to choose a return date after the Easter vacation which ends on 26 April 2022. The Judge stated that this was a long time away and it was agreed that the issue of the date would be returned to.
- 1.71 The Judge stated that the "*court documents*" referred to in the Order should include a transcript, or at least a note of the hearing.
- 1.72 It was agreed that the recitals should refer to the Claimants acknowledging that they do not intend to prohibit lawful protest as opposed to confirming.
- 1.73 The Judge stated that the references to sites 1 and 2 in the draft Order were confusing and should instead refer to Buncefield Site 1 and Kingsbury Site 2. In relation to the first injunction the Judge stated that and / or should be removed and the alternatives provided for. In relation to the second injunction the Judge stated that the Order should refer to obstructing or interfering. It was agreed that these amendments would need to be replicated for both sites.
- 1.74 The Judge stated that the variation provision should be amended to provide for 12 hours and 6 hours respectively instead of 24 and 12 hours.
- 1.75 It was agreed that the time estimate for the return date should be 3 hours and that further evidence should be filed 3 working days before the hearing by 4.30pm?
- 1.76 Leading Counsel confirmed the intended service provisions and confirmed that the court documents and hearing court bundle would be affixed at two locations around the perimeter of each site. It was agreed that the locations should be prominent.
- 1.77 Leading Counsel confirmed that the web link reference would be inserted into the draft Order where indicated and that there was a notice for each site behind schedules 6 and 7 which were included in the new draft Order provided to the Judge. Leading Counsel confirmed that the claim number and the date would need to be inserted into the notice.
- 1.78 The Judge stated that the notices would need to be altered given the amendments made to the terms of the Order and Leading Counsel confirmed that the amendments would need to be followed through.
- 1.79 The Judge queried whether the red and blue shading in the plans had been identified and explained which Leading Counsel confirmed was the case.
- 1.80 Leading Counsel confirmed that the site notices could be affixed at the sites in A3 size straight away and in about 2 weeks' time could be affixed in size 1 x 1.5 m.

- 1.81 In response to the Judge's query as to whether a bigger size notice could be affixed straight away it was agreed that the notices could be increased to A2 size and wording would be added to the draft Order to provide for this increase in size.
- 1.82 In relation to the return date the Judge indicated that he would like it to be around 27 April time and Leading Counsel confirmed that she and Junior Counsel were unavailable on that date. It was agreed that there would be short adjournment until 3.15pm during which time enquiries as to the date could be made and following which the Judge would give a short judgment.
- 1.83 Leading Counsel confirmed that the Claimants would be requesting a transcript of the hearing and that a revised Order would be sent to the Judge as soon as possible following judgment.

[Court adjourned until 3.15pm]

[Hearing recommenced at 3.15pm]

2. Judgment of Peter Knox QC sitting as a Judge of the Chancery Division

This is my judgment. An ex parte application was brought by the Claimants for an interim injunction to restrain the Defendants from entering premises and interfering with private access routes. Notice to the Respondents was given this morning. The notice was given by email.

The Respondents, Extinction Rebellion and Just Stop Oil, are the principal campaign groups that directly targeted the sites in question from 01 April, it is anticipated that there will be further action.

Extinction Rebellion is often referred to in the national press and is a well-known movement.

Just Stop Oil is a youth protest group who engage in non-violent civil disobedience through strikes boycotts, mass protests and disruption.

The first Claimant United Kingdom Oil Pipelines Limited owns the oil pipeline administered by the British Pipeline Agency. The pipeline transports 6 billion litres of oil a year and consists of two pipelines.

The second Claimant, West London Pipeline and Storage Limited, is a related company that stores fuel and transports it to Heathrow, Gatwick and Luton Airports.

There are 2 properties that are the subject of this application.

The first property is land near Cherry Tree Lane in Hemel Hempstead. This is known as the Buncefield Terminal. The First Claimant owns freehold land and a long-term leasehold interest that has right of way over an access way. The Second Claimant owns a freehold interest.

According to the evidence, the Buncefield Terminal has the largest storage capacity in the UK. It receives product from the pipeline operation and it provides loading facilities. It enables storage and batching of aviation fuel for transmission to Gatwick/ Heathrow airports. According to the evidence, this terminal is of key strategic importance to the UK itself and the Heathrow, Gatwick, Luton airports depend on it to maintain operations. The Buncefield site consists of offices, pipeline reception facilities etc. The main entrance is gated but the gates need to be open permanently. This entrance leads out via the access way and public road to the M1. There are other accesses but these are permanently closed.

The Kingsbury Oil Terminal, is the second site in question and it consists of a series of plots. The oil depot which is not owned by the Claimants, serves as a supplier to multiple airports. The east plots are owned by UKOP and they consist primarily of a central control centre which operates certain pipelines.

The application has been prompted by the following events which, on the basis of evidence before me, were posted by the Defendants' campaigners.

These activities are dealt with in John Armstrong's Witness Statement made yesterday and I can summarise what he says in paragraph 44 of that statement. The Buncefield site was one of 10 facilities targeted by individuals carrying out direct action. They forced the closure of Green Lane which is one of the entrances to the site. On 03 April Buncefield Terminal was targeted, Just Stop Oil protestors caused damage to the perimeter fences which form part of the site. On 3 April 2022 according to a police report, individuals blocked access to the site. This is an ongoing campaign, and direct action is only going to ramp up.

On 4 April 2022, it was reported that 41 arrests were made. According to police, protestors put themselves, site workers and emergency service workers in danger.

As for the Kingsbury site, this too is subject to direct action. On 1 April, campaigners were preventing oil tankers from accessing the oil terminal. I state here that this is not entirely accurate because it talks about action taken at the oil depot itself not outside the land owned by the Claimants. It is action taken against owners of another piece of land which is nearby to the Claimants' land.

On 5 April, 20 activists again blocked the entrance to the terminal depot that is not owned by the Claimants. It seems that a total of 8 campaigners were arrested.

On 7 April, supporters of Just Stop Oil were inside Kingsbury Oil Terminal.

Mr Armstrong goes on to set out a number of instances which occurred at other terminals over the last 7 days. Members of the group blocked 10 oil terminals. It was reported that Andy Smith stated that they "held" 3 locations of strategic importance. A particular point is that ExxonMobil had to shut down terminals due to indirect action.

On 4 April, it was reported that activists were planning disruption using tunnels to frustrate activities of key and essential oil infrastructure. On 5 April, the Times newspaper reported that supporters had dug a secret network of tunnels. According to a further website entry from Extinction Rebellion, individuals were encouraging people to book time off work to continue civil disobedience. The stated intention was to grind the capital to a halt and cause maximum disruption.

The Claimants, in light of all this evidence, say that they need urgent injunctions to restrain continuation of these activities, which they say could lead campaigners to trespass and cause a nuisance by obstructing access to and from the site. The first question is whether there is a serious issue to be tried and are the Claimants entitled to an injunction.

I find, on the evidence before me, that there is a serious issue to be tried. First, as far as both plots of land are concerned, the evidence showed that the Claimants are the owners of the land. Second, in relation to Buncefield, there is a clear risk that the Defendants will continue their activities and thus interfere with the First Claimant's rights of access to and from the premises, thereby causing a nuisance. That is what campaigners were doing in the last week.

I am also satisfied that it goes further than that, in that they will not only seek to restrict access or walk onto the land, but they will seek to take control of the land and its facilities. I also draw inference from that fact that both groups clearly advocate civil disobedience.

One point that troubled me in particular was whether there was evidence that they intended to do anything other than making it difficult for tankers to access the sites. The point being that, the Kingsbury site depot is not owned by either Claimant so there is no real risk that the activities will interfere with the central control centre. However, I was taken to the following evidence and summarise why I am satisfied that there is a prima facie serious risk that both campaign groups will extend their activities to seeking to disrupt control activities:

- First publication dated 6 April 2022 published by Extinction Rebellion. Join us and act now. Section B, page 196 says: *"we are willing to take part in non violent direct action targeting oil facilities"*. Ms Holland emphasises *"targeting the UK oil and gas infrastructure"*. I can therefore draw an inference that Extinction Rebellion will keep going with non-violent Direct Action.
- Second extract is from the BBC website. It includes a report which notes that Just Stop Oil claim to be willing to use non-violent civil resistance to make their point in public spaces. This leads me to infer that the activities are not limited to blocking access.
- Report from Daily Mail – 5 April. This notes that an activist from Just Stop Oil blocked off access. 20 protesters were involved, and 5 arrests were made. 20 protestors sat on road with banners. It also claimed supporters of the group had dug up a secret network of tunnels.
- Tweet dated 7 April 2022 – from supporter of Just Stop Oil which says: *"on 7 day of action, supporters of Just Stop Oil blocking access. Part of wider measures taken with aim of disrupting UK oil."*
- Tweet from Just Stop Oil following entry into Kingsbury Oil Terminal saying *"we seem to have free reign of the place"*. Photographs show number of campaigners in premises themselves.

I am prepared to draw the inference that the campaigners are not simply limiting their activities to making it difficult for oil tankers to enter the oil depot and will extend to any activity likely to disrupt the oil industry in the UK which will include disrupting facilities the Claimants own at Kingsbury and Buncefield.

On the current evidence, the campaign and the protests can be carried out without having to commit acts of trespass/ nuisance.

There is a good argument that the Claimants will be able to obtain a final injunction which will not interfere with the Defendants' rights. I emphasise that this is a mere first impression of what appears to be a good arguable case without hearing evidence from the other side.

The second question is whether the matter is urgent. It is in my judgment. The action appears to have started and there is a particular campaign that is intending to take place from 9 April to 17 April and thereafter weekends.

The third question is what is the balance of convenience? Does it favour an injunction being granted? I find that the balance does favour an injunction because there is a clear risk of causing disruption to the Claimants' businesses. I accept that as matters stand damages would not be an adequate remedy.

Is there a satisfactory cross-undertaking in damages? I initially raised concern as there were no accounts from the Claimants. I am now satisfied that there is a satisfactory cross-undertaking as they both own substantial plots of land and according the Land Registry, there are no mortgages or charges, so they are good for the money if order for damages is made against them

Is there a proper case for the relief sought? The answer is yes, I agree with submissions of paragraph 11.8 in the Skeleton, acts of trespass have already occurred and there is risk of further torts being committed in the future.

The sixth question is whether the requirements of section 12(2) of the Human Rights Act are satisfied. I am satisfied in the present case that there were compelling reasons for why the Defendants were not notified until this morning. That is set out in Mr Armstrong's evidence in paragraph 66.

There was a real risk that giving notice would prompt an escalation in the direct action and put the properties in question at risk. I am therefore satisfied that there were compelling reasons for only providing the short notice given.

I also have to consider section 12(3). I am satisfied that if one could call the trespassing a publication, that it is likely that the Claimants would establish that those activities should not be allowed to continue because the Defendants can enjoy rights and freedom of expression without having to go as far as committing acts of trespass.

I should also add in relation to the question on pre-emptive relief. I am satisfied that it is not possible to name individual defendants and notice ought to be given by affixing large notices around the perimeters of the sites. I am satisfied that service can be effected in the way proposed by the Claimants which suggests that notice can be effected by putting the court documents in prominent places at the particular sites.

I am therefore prepared at this early stage to grant the injunction in the terms previously discussed with Ms Holland QC