

IN THE HIGH COURT OF JUSTICE

Claim No. PT-2022-000303

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

CHANCERY DIVISION

PROEPRTY TRUSTS AND PROBATE LIST

Before [Judge]

On [Date]

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 / Respondent

(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 / Respondent

DRAFT ORDER

FURTHER to the Order of Mr Simon Gleeson (sitting as a Judge of the Chancery Division) granting the Claimants final injunctive relief until 20 October 2028 (the "**Gleeson Order**")

AND UPON the Order of Mr Justice Miles (sitting as Judge of the Chancery Division) reviewing the Gleeson Order and being satisfied that there had been no material change in circumstances warranting amendments to, or the setting aside of, the relief granted in the Gleeson Order (the "**2024 Order**")

AND UPON a review hearing being listed in a three day window from 11 November 2025 for a review of the Gleeson Order, pursuant to paragraph 12 of the Gleeson Order

AND UPON the hearing of the Claimant's Application dated 24 October 2025 in relation to the description of the Defendants

AND UPON hearing Counsel for the Claimants and the Defendants not being represented or appearing

AND UPON the Court reviewing the Gleeson Order and being satisfied that there had been no material change in circumstances warranting amendments to, or the setting aside of, the relief granted by the Gleeson Order save as set out in this Order

IT IS ORDERED THAT:

1. Subject to the following provisions of this Order, including as to the description of the persons to be described as the First and Second Defendants, the Gleeson Order shall continue.
2. The Claimants be permitted to amend the Claim Form (the "**Amended Claim Form**") and amend the Particulars of Claim (the "**Amended Particulars of Claim**") to change the description of the First and Second Defendants as shown in red text in the Amended Claim Form and shown in red text in the Amended Particulars of Claim appended hereto at Schedule 1 to this Order.
3. Service and notification of the Amended Claim Form and Amended Particulars of Claim be dispensed with.
4. The Gleeson Order be amended in the form appended hereto at Schedule 2 to this Order (the "**Amended Gleeson Order**") to reflect:
 - (a) the variations permitted by paragraphs 2 and 3 of the 2024 Order, and as shown in green text; and
 - (b) the amended description of the First and Second Defendants, as permitted in paragraph 2 above, and as shown in red text..
5. The Amended Gleeson Order shall be notified to the First and Second Defendants in accordance with paragraphs 6-8 of the Gleeson Order (as varied by paragraphs 2 and 3 of the 2024 Order).
6. This Order shall be notified to the First and Second Defendants in accordance with paragraphs 9-11 of the Gleeson Order.
7. Costs reserved.

Schedule 1

Amended Claim Form and Amended Particulars of Claim



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 as amended

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

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

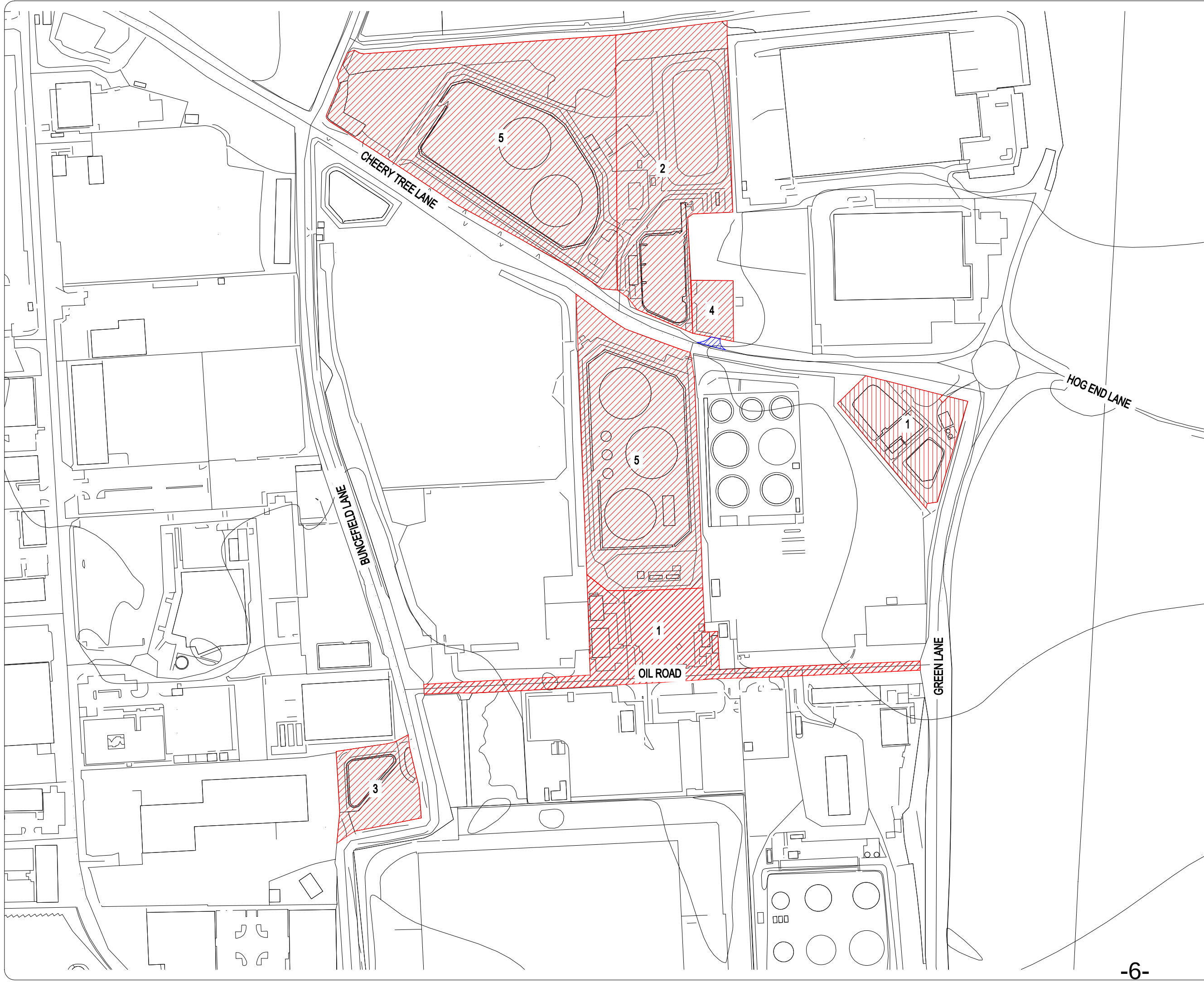
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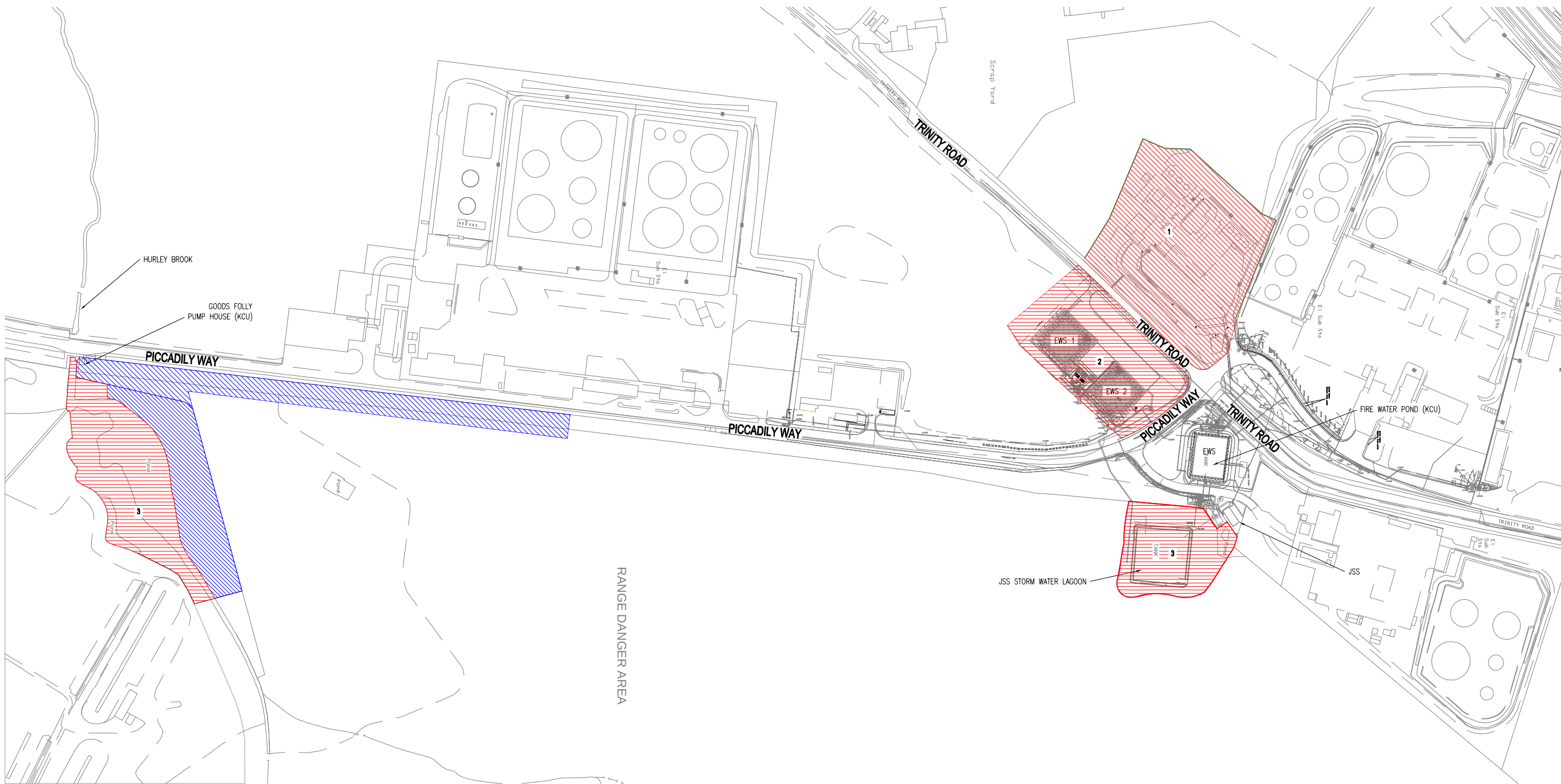
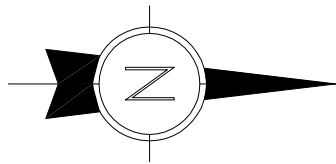
OTD/000162

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, **OR OTHER ENVIRONMENTAL 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, **OR OTHER ENVIRONMENTAL 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

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, OR OTHER ENVIRONMENTAL 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 CONSENT AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN, OR OTHER ENVIRONMENTAL 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)

Defendant

PARTICULARS OF CLAIM

Definitions and Interpretation

1.1 In these Particulars of Claim, the description “Site 1” is a reference to the following property:

1.1.1 The freehold land comprising:

- (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 attached (“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.

1.1.2 The leasehold land comprising:

- (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.

1.2 In these Particulars of Claim, the description “Site 2” is a reference to the following property:

1.2.1 The freehold land comprising:

- (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 attached (“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 Plan.

1.2.2 The leasehold land being land at Kingsbury in the County of Warwick, as more particularly described in a Lease dated 3 November 2012 made between (1) The Secretary of State for Defence and (2) United Oil Kingdom Pipelines Limited and marked 3 on the Site 2 Plan.

The Claimants

- 2.1 The First Claimant is the freehold registered proprietor of those parts of Site 1 referred to in Paragraphs 1.1.1(a), (b) and (c) above and the lessee of the land referred to in Paragraph 1.1.2 above.
- 2.2 The First Claimant is also the freehold proprietor of the that part of Site 2 referred to in Paragraph 1.2.1(a) above, the freehold registered proprietor of that part of Site referred to in Paragraphs 1.2.1(b) above and the lessee of that part of the Site referred to in Paragraph 1.2.2 above.
- 2.3 Pursuant to clause 2, Schedule 1 of the Lease referred to in Paragraph 1.1.2 above, the First Claimant also enjoys a right at all times with or without vehicles to enter upon and to pass over and across the accessway forming part of the landlord’s retained land, as shown coloured blue on the Site 1 Plan (“the Site 1 Access Route”).
- 2.4 The Second Claimant is the registered freehold proprietor of that part of Site 1 which is referred to in Paragraph 1.1.1(d) above.
- 2.5 Pursuant to clause 2 of the Site 2 Lease, the First Claimant also enjoys a right at all times (with or without vehicles) over, and other ancillary rights in respect of, the accessway forming part of the landlord’s retained land (“the Site 2 Access Route”).

The Campaigns

- 3.1 'Extinction Rebellion' and 'Just Stop Oil' are environmental campaign groups. 'Extinction Rebellion' is an international environmental movement, claiming to be use non-violent civil disobedience to protest against *"mass extinction and minimise the risk of social collapse"*. 'Just Stop Oil' is a protest group which describes itself as a *"coalition of groups working together to ensure the Government commits to halting new fossil fuel licensing and production"* and to protest through means of non-violent civil disobedience with *"strikes, boycotts, mass protests and disruption"*.
- 3.2 There is a real and substantial risk of imminent acts of trespass and/or nuisance affecting Site 1 and/or Site 2 by persons acting in connection with or affiliated to the 'Extinction Rebellion' campaign and/or the 'Just Stop Oil' campaign. There is also a real and substantial risk of imminent acts of nuisance affecting the Site 1 Access Route and/or the Site 2 Access Route by persons acting in connection with or affiliated to the 'Extinction Rebellion' campaign and/or the 'Just Stop Oil' campaign. In particular, the risks arise from the following:
- 3.2.1 There were trespasses on Site 1 on 3 April 2022 when certain individuals managed to gain access to Site 1.
- 3.2.2 There has been direct action in and around Site 1 and Site 2 since 1 April 2022:
- (a) On 1 April 2022, 'Just Stop Oil' supporters climbed on the top of an oil tanker at the entrance to Site 1 whilst other supporters sat on the road in front of the tanker, some of whom chained themselves to the oil tanker.
 - (b) On 1 April 2022, 'Extinction Rebellion' and 'Just Stop Oil' supporters blocked entrances to Site 2 preventing oil tankers from leaving and they also let out the air on the tyres of an oil tanker.
 - (c) On 2 and 3 April 2022, there was continuing direct action outside Site 2, involving acts of obstructions and damage.
 - (d) On 3 and 4 April 2022, there was direct action outside Site 1, which included supporters blocking the entrance to Site 1, camping outside, standing on fuel trucks with banners and sitting outside the gates to prevent tankers from leaving.

- (e) On 5 April 2022, the entrance at Site 2 was again blocked and certain supporters glued themselves to the road or locked on.
- (f) On 7 April 2022, the entrance to Site 2 was again blocked. Those carrying out direct action also claimed to be inside the Kingsbury oil terminal but not those parts which comprise Site 2.

3.2.3 The events referred to above have been part of an ongoing co-ordinated campaign by supporters of 'Extinction Rebellion' and supporters of 'Just Stop Oil' which has involved direct action at various other oil terminals and/or facilities in the UK.

3.3 By reason of the facts and matters aforesaid:

3.3.1 An injunction is sought to forbid the First Defendants and each of them from entering or remaining upon Site 1 and/or from causing damage to, or removing equipment from Site 1, without consent; and/or

3.3.2 An injunction is sought to forbid the Second Defendants and each of them from interfering with the First Claimant's rights to pass and re-pass (with or without vehicles and at any time) over the Site 1 Access Route; and/or

3.3.3 An injunction is sought to forbid the First Defendants and each of them from entering or remaining upon Site 2 and/or from causing damage to, or removing equipment from Site 2, without consent; and/or

3.3.4 An injunction is sought to forbid the Second Defendants and each of them from interfering with the First Claimant's right to pass and re-pass (with or without vehicles and at any time) over the Site 2 Access Route.

AND THE FIRST CLAIMANT CLAIMS

(1) An order that the First Defendants and each of them are forbidden from entering or remaining without consent upon the following land and/or from causing damage to or removing equipment therefrom:

(a) The freehold land comprising:

- (i) 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:
- (ii) 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.
- (iii) 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.
- (iv) 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.
- (v) 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 Plan.

(b) The leasehold land comprising:

- (i) 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.
- (ii) The leasehold land at Kingsbury in the County of Warwick, as more particularly described in a Lease dated 3 November 2012 made between (1) The Secretary of State for Defence and (2) United Oil Kingdom Pipelines Limited and marked 3 on the Site 2 Plan.

- (2) An order that the Second Defendants and each of them are forbidden from interfering with the First Claimant's right to pass and re-pass (with or without vehicles at any time) over the private access road on the land adjoining Site 1, which is shown for illustrative purposes shaded blue on the Site 1 Plan.

(3) An order that the Second Defendants and each of them are forbidden from interfering with the First Claimant's right to pass and re-pass (with or without vehicles at any time) over the private access road on the land adjoining Site 2, which is shown for illustrative purposes shaded blue on the Site 2 Plan.

(4) Costs.

(5) Further and/or other relief.

AND THE SECOND CLAIMANT CLAIMS

(1) An order that the First Defendants and each of them are forbidden from entering or remaining upon that part of Site 1 comprising 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) Costs.

(3) Further and/or other relief.

KATHARINE HOLLAND QC

YAASER VANDERMAN

STATEMENT OF TRUTH

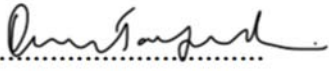
The Claimant believes that the facts stated in these particulars of claim are true. The Claimant understands that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief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

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

Full name DANIEL OWEN CHRISTOPHER TALHAM DAVIES

Name of solicitor's firm FIELD & FISHER LLP

Position or office held PARTNER

Signed 

Claimant's solicitor

Schedule 2

Amended Gleeson Order

Amended pursuant to the Order of [Master][District Judge..... or as
may be] [Legal Adviser] dated [.....]

Amended pursuant to the Order of Mr Justice Miles dated 20 November 2024

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

Before Mr Simon Gleeson (sitting as a Judge of the Chancery Division)

On 6 October 2023

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, **OR OTHER ENVIRONMENTAL 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, **OR OTHER ENVIRONMENTAL 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

FURTHER to the Orders of Peter Knox QC (sitting as Deputy High Court Judge) sealed on 12 April and 21 April 2022 and the Order of The Honourable Mr Justice Rajah sealed on 21 April 2023

UPON the hearing of the Claimants' Application dated 7 July 2023

UPON hearing Myriam Stacey KC and Yaaser Vanderman for the Claimants and the Defendants not being represented or appearing

AND UPON READING the evidence recorded on the Court file (and set out in Schedule 1) as having been read

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

AND UPON the Claimants being permitted to apply for summary judgment against the Defendants pursuant to CPR 24.4(1)

IT IS ORDERED THAT:

THE INJUNCTIONS

1. Until 23:59 hrs on 20 October 2028:

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

- (i) 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 3 of this 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.
- (ii) 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)

- (i) 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 4 of this 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.
- (ii) 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 Kingsbury (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

- 2. 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.
- 3. 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.
- 4. The Claimants have liberty to apply to extend or vary this Order or to seek further directions.

INTERPRETATION OF THIS ORDER

- 5. 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

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

- (a) Posting the Order at the following web link: <https://ukop.azurewebsites.net;>
 - (b) Fixing copies thereof in clear ~~transparent sealed containers envelopes~~ at a minimum number of 2 prominent locations on the perimeter ~~fencing or gates~~ of each of the Sites;
 - (c) Fixing warning notices in the form set out in Schedules 5 and 6 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 Buncefield (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); and
 - (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 6(a) above:
 - (i) xr-legal@riseup.net;
 - (ii) juststopoilpress@protonmail.com;
 - (iii) info@juststopoil.org; and
 - (iv) [juststopoil@protonmail.com.](mailto:juststopoil@protonmail.com)
7. 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. For the avoidance of doubt, good service will have been effected once the initial posting, fixing and sending has taken place regardless of whether copies of the Order or warning notices are subsequently removed, for example, by the actions of third parties.
8. 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.

ALTERNATIVE SERVICE PROVISIONS FOR FUTURE APPLICATIONS, ANY OTHER DOCUMENTS, AND ANY NOTICE OF HEARINGS BY THE CLAIMANTS IN THIS CLAIM

9. Pursuant to CPR 6.15, 6.27 and 81.4(2)(c) and (d), service of any future applications, and any other documents, any notice of hearings in this Claim by the Claimants and their evidence in support, shall be effected as follows:
- (a) Posting copies of these documents at the following web link: <https://ukop.azurewebsites.net;> and
 - (b) 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 9(a) above:
 - (i) xr-legal@riseup.net;
 - (ii) juststopoilpress@protonmail.com;

(iii) info@juststopoil.org; and

(iv) juststopoil@protonmail.com.

10. Pursuant to CPR 6.15(3), 6.27 and 81.4(2)(c) and (d), any documents served pursuant to the provision in paragraph 9 above will be deemed to be served on the latest date on which all of the methods of service referred to in paragraph 9 above have been completed in respect thereof, such date to be verified by the completion of a certificate of service.
11. Pursuant to CPR 6.15, 6.27 and 81.4(2)(c) and (d), the steps identified in paragraph 9 above shall stand as good service.

FURTHER DIRECTIONS

12. There shall be on or around the anniversary of this Order subject to Court availability for as long as this Order is in force, a hearing to review this final injunction Order with a time estimate of 2.5 hours plus reading time. The Claimants shall liaise with the Court to list any such hearings and provide the Defendants with the notice of hearing as soon as practicable in accordance with paragraph 9 above.
13. The Claimants shall have permission to file and serve any further evidence at least 14 days before the date of any review hearing.
14. The Claimants are to file the bundle for any review hearing not less than 7 days before the date of any review hearing.
15. The Claimants and any Defendants must file with the Court, and exchange to the extent that there are any named Defendants joined to the claim, skeleton arguments along with a bundle of authorities not less than 3 days before the date of any review hearing.

COSTS

16. Costs reserved.

COMMUNICATIONS WITH THE COURT

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

Court Manager
The Business and Property courts of England and Wales
7 Rolls Building, Ground Floor/Counter 9
Fetter London
EC4A 1NL

The telephone number is 020 7947 6690. The offices are open weekdays 10.00 a.m. to 4.30 p.m.

18. Name and address of the Claimants' legal representatives

Fieldfisher LLP
Riverbank House
2 Swan Lane
London
EC4R 3TT

Telephone: 0330 460 7000
Fax: 020 7488 0084
Reference: ADP/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: ADP/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
6. Third Witness Statement of John Armstrong dated 5 April 2023
7. Second Witness Statement of Peter Davis dated 5 April 2023
8. Third Witness Statement of Daniel Owen Christopher Talfan Davies dated 14 April 2023
9. Fourth Witness Statement of John Armstrong dated 6 July 2023
10. Third Witness Statement of Peter Davis dated 5 July 2023
11. First Witness Statement of Antony Douglas Phillips dated 24 July 2023
12. Fifth Witness Statement of John Michael Armstrong dated 22 September 2023

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 which is registered at Land Registry under title number WK522590 and marked 3 on the Site 2 Plan.

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

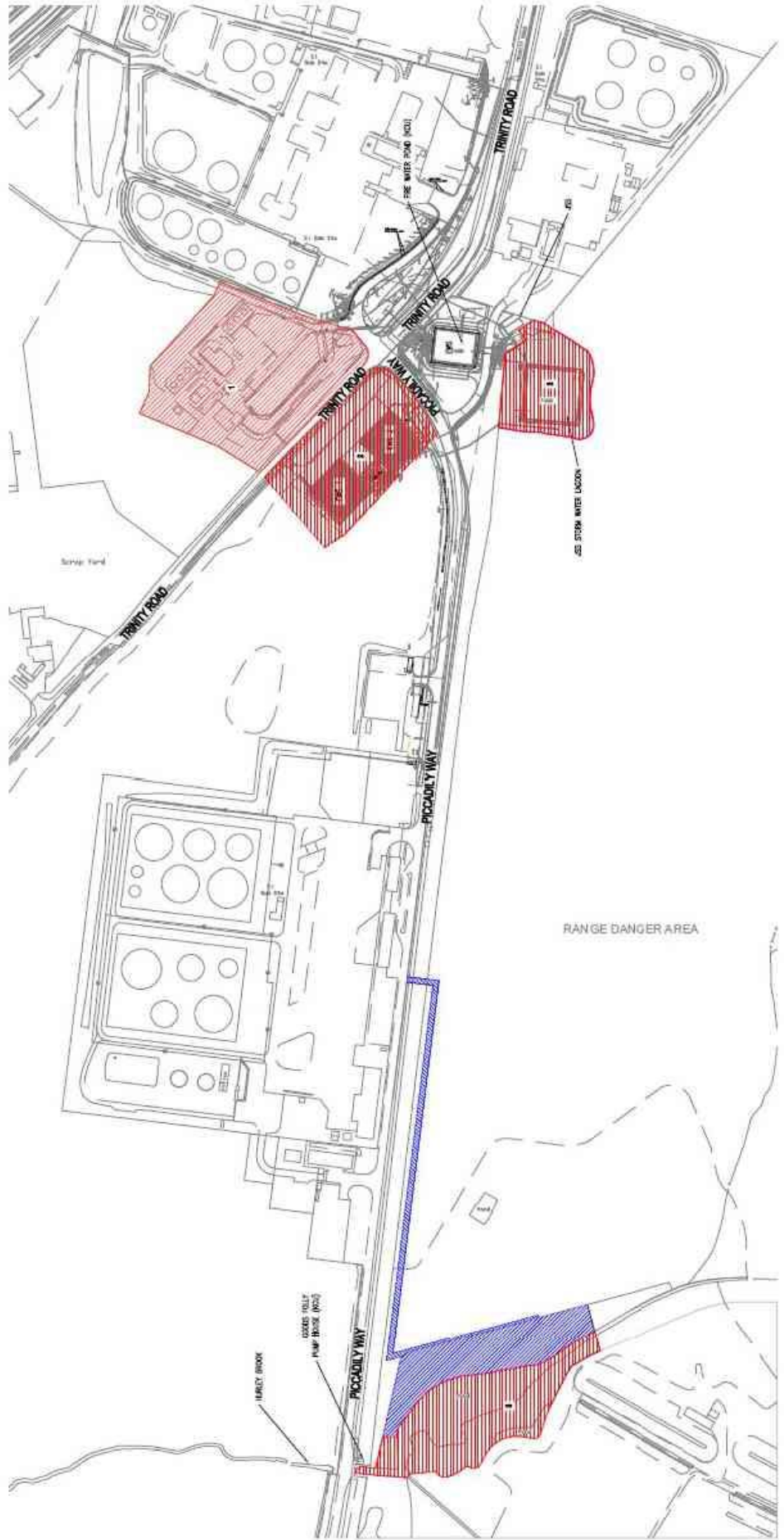
SCHEDULE S

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



SCHEDULE 4

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



SCHEDULE 5

SEE ATTACHED SITE 1 NOTICE



HIGH COURT CLAIM NO: PT – 2022 - 000303

HIGH COURT INJUNCTION IN FORCE

NOTICE OF HIGH COURT ORDER DATED [] 2023

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 23:59 HRS ON 20 OCTOBER 2028, 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.

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 ADP/UKOP), using an online file hosting service, the Court documents, witness evidence and exhibits.

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.

SCHEDULE 6

SEE ATTACHED SITE 2 NOTICE

HIGH COURT CLAIM NO: PT – 2022 - 000303

HIGH COURT INJUNCTION IN FORCE

NOTICE OF HIGH COURT ORDER DATED [] 2023

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 23:59 HRS ON 20 OCTOBER 2028, 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.



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 ADP/UKOP), using an online file hosting service, the Court documents, witness evidence and exhibits.

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 registered which is registered at Land Registry under title number WK522590 and marked 3 on the plan above.

Claim No. PT-2022-000303

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

(2) WEST LONDON PIPELINE AND STORAGE
LIMITED

Claimants / Applicants

and

PERSONS UNKNOWN AS MORE PARTICULARLY
DESCRIBED IN THE CLAIM FORM

Defendants / Respondents

DRAFT ORDER

Fieldfisher LLP
Riverbank House
2 Swan Lane
London EC4R 3TT
Tel: 0330 460 7000
Fax: 020 7488 0084

Ref: ADP/UK01-000162.00301