Docusign Envelope ID: D79B2AC1-0C85-868D-8257-1D2C24056E77

Party: Claimants
Witness: Cole Cannings
Number: First
Dated: 23 November 2026

IN THE HIGH COURT OF JUSTICE **Claim No. PT-2022-000303**

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

BUSINESS AND PROPERTY 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, 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) Defendants

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, 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

WITNESS STATEMENT OF COLE CANNINGS

I, Cole Cannings, of Fieldfisher LLP, Riverbank House, 2 Swan Lane London EC4R 3TT will say as follows:

1. I make this statement in my capacity as a solicitor at Fieldfisher LLP ("**Fieldfisher**"), the solicitors acting for the Claimants in these proceedings.

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2. The facts and matters set out in this statement are within my own knowledge unless otherwise stated, and I believe them to be true. Where I refer to information supplied by others, the source of the information is identified; facts and matters derived from other sources are true to the best of my knowledge and belief.

3. For ease, in this statement I have adopted the definitions set out in the Order of Mr Simon Gleeson (sitting as a Judge of the Chancery Division) dated 6 October 2023 as amended by the Order of Master Kaye dated 13 November 2025 (sitting as a Judge of the Chancery Division) (the "**Amended Gleeson Order**").

PURPOSE OF THIS STATEMENT

4. This statement is intended to supplement the sixth witness statement of Antony Douglas Phillips, also of Fieldfisher, dated 19 January 2026 ("**Phillips 6**") which evidenced:

   (a) the Claimants' compliance with paragraph 6 of the Order of Master Kaye (sitting as a Judge of the Chancery Division) on 13 November 2025 (the "**Order**") by serving the Order pursuant to the steps set out in paragraphs 9 to 11 of the Amended Gleeson Order; and

   (b) the Claimants' compliance with paragraph 5 of the Order relating to service of the Amended Gleeson Order in accordance with paragraphs 6 to 8 of the Amended Gleeson Order.

5. The purpose of this statement is to provide the Court with further information concerning the chronology of that notification and, in particular, to explain why notification did not take place immediately after the Order was made on 13 November 2025.

COMPLIANCE WITH PARAGRAPH 6(B) and 6(C) OF THE AMENDED GLEESON ORDER

6. Paragraph 15 and 16 of Phillips 6 outlines how notification of the Amended Gleeson Order was effected in accordance with paragraph 6(b) of the Amended Gleeson Order at approximately 14:00 on 22 December 2025 in respect of Site 1 and between 11:00 and 11:25 on 24 December 2025 in respect of Site 2. Paragraph 17 and 18 of Phillips 6 further outlines how notification of the Amended Gleeson Order and the site warning notices was effected in accordance with paragraph 6(c) of the Amended Gleeson Order between 13:30 and 15:00 on 23 December 2025 in respect of Site 1 and between 08:45 and 10:45 on 24 December 2025 in respect of Site 2.

7. The Claimants wish to explain why notification of the Amended Gleeson Order pursuant to paragraph 6(b) and (c) of the Amended Gleeson Order was not made prior to 22 to 24 December 2025 when the Order was made on 13 November 2025. In particular:

   (a) a sealed copy of the Order was provided to Fieldfisher by the Court through CE-File at 13:52 on 9 December 2025. Before that date, both Fieldfisher and Brick Court Chambers had contacted the Court on a number of occasions to request the sealed Order, including because the approaching Christmas period was likely to affect the practical arrangements required for notification at the Sites;

   (b) once the sealed Order had been received, employees of British Pipeline Agency Limited (as agent for and on behalf of the Claimants) ("**BPA**") arranged for notification at the Sites in accordance with paragraphs 6(b) and 6(c) of the Amended Gleeson Order. Those arrangements included commissioning permanent warning signs in the forms set out in Schedules 5 and 6 to the Amended Gleeson Order and in a size of not less than A2. The signs were produced by a third-party supplier during the period immediately before

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Christmas. By way of illustration, copies of the permanent signs can be seen at **UKOP19: pages 17-78.**

(c) the permanent signs were delivered to BPA on or around 23 December 2025. BPA personnel then attended the Sites to affix the signs in the required locations. In the course of those attendances, they also fixed copies of the Amended Gleeson Order in clear envelopes at prominent locations on the perimeter fencing or gates, as described in paragraphs 15 and 16 of Phillips 6.

8. Accordingly, the physical methods of notification required by paragraphs 6(b) and 6(c) of the Amended Gleeson Order were completed between 22 and 24 December 2025. This was after the sealed Order was received on 9 December 2025 and included the time required to commission, produce, deliver and install the permanent A2 signage at both Sites during the period immediately before Christmas.

COMPLIANCE WITH PARAGRAPH 6(A) AND 9(A) OF THE AMENDED GLEESON ORDER

9. As set out above, physical notification at the Sites was completed between 22 and 24 December 2025. Fieldfisher received confirmation from BPA on 24 December 2025 that the attendances at the Sites had been completed. On 5 January 2026, Fieldfisher were provided by BPA with complete copies of the information, photographs and logs evidencing that such notification had been successfully effected at both Sites. Following that confirmation, copies of the Amended Gleeson Order and the Order were posted at the specified web link at 15:34 on 5 January 2026, as described in paragraphs 7 and 8 of Phillips 6.

10. Notification by way of uploading copies of the Order and the Amended Gleeson Order to the web link was undertaken after physical notification at the Sites was complete, but shortly after Fieldfisher received the relevant evidence from BPA that physical notification at the Sites had been effected, meaning that when the necessary documents were uploaded to the web link, the physical notices and copies of the Amended Gleeson Order were in place at the Sites. This sequencing was deliberate and carried out for the reasons set out in the section below.

11. The website notification was therefore completed four working days after completion of the physical notification required by paragraphs 6(b) and 6(c) of the Amended Gleeson Order and the same day on which evidence of service had been provided by BPA to Fieldfisher.

COMPLIANCE WITH PARAGRAPH 6(D) AND 9(B) OF THE AMENDED GLEESON ORDER

12. Pursuant to the Order and in accordance with Paragraph 6(d) and 9(b)of the Amended Gleeson Order, the Claimants were obliged to send an email to a number of email addresses with information that copies of the Order and any other documents may be viewed at the web link referred to at paragraph 6(a) and 9(a) of the Amended Gleeson Order.

13. Paragraphs 10 to 14 of Phillips 6 outlines the steps taken in order to ensure the Claimants' compliance with paragraphs 6(d) and 9(b) of the Amended Gleeson Order in respect of notification of the Amended Gleeson Order and the Order respectively, with such notification being effected on 7 January 2026.

14. The email notifications required by paragraphs 6(d) and 9(b) informed the specified recipients that copies of the relevant documents could be viewed at the web link identified in paragraphs 6(a) and 9(a). The documents therefore needed to be available at that web link before those emails were sent.

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15. Further, at the hearing of the second annual review of the subject injunction, and as is noted in the Amended Gleeson Order, the email addresses to which the Claimant was required to serve the Amended Gleeson Order and the Order was increased to include the known email addresses for a number of other environmental campaign groups. At the hearing, it was expressly noted that there was a danger that notifying those additional groups would put those groups "on notice" as to the existence of the Sites and that said groups would then take steps to go and see the Sites. As a result, the Claimants deliberately decided to take all other steps for notification before sending these emails so that the Amended Gleeson Order would be effective as against these other groups as soon as they received the email (given that, under paragraph 8 of the Order, deemed service would occur on the latest date on which all of the prescribed methods had been completed).

16. The final prescribed method, namely email notification, was completed on 7 January 2026, two working days after the documents were posted at the specified web link.

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: Signed by: Cole Cannings 8B6A49B302004FA... Dated: 23 November 2026

Cole Cannings