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)

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

BUNDLE FOR USE AT THE HEARING OF REVIEW OF THE FINAL INJUNCTION ORDER

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

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

BUSINESS AND PROPERTY DIVISION

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(1) UNITED KINGDOM OIL PIPELINES LIMITED

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Second Defendant / Respondent

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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

HIGH COURT OF JUSTICE ★ THE BUSINESS AND PROPERTY COURTS OF ENGLAND & WALES ★

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.

For court use only

Claim no.	
Issue date	PT-2022-000303

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, Hertfordshire, HP2 5BS.

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.

© Crown Copyright 2

Claim No.	

Does, or will, your claim include any issues under the Human Rights Act 1998? [X] Yes [ ] No

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

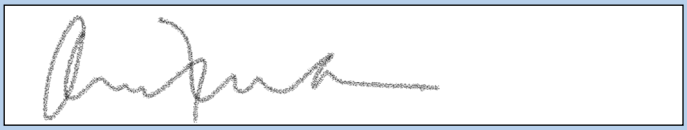
Statement of Truth

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

EC4R 3TT

If applicable

Phone number

03304607000

Fax phone number

DX number

Your Ref.

OTD/000162

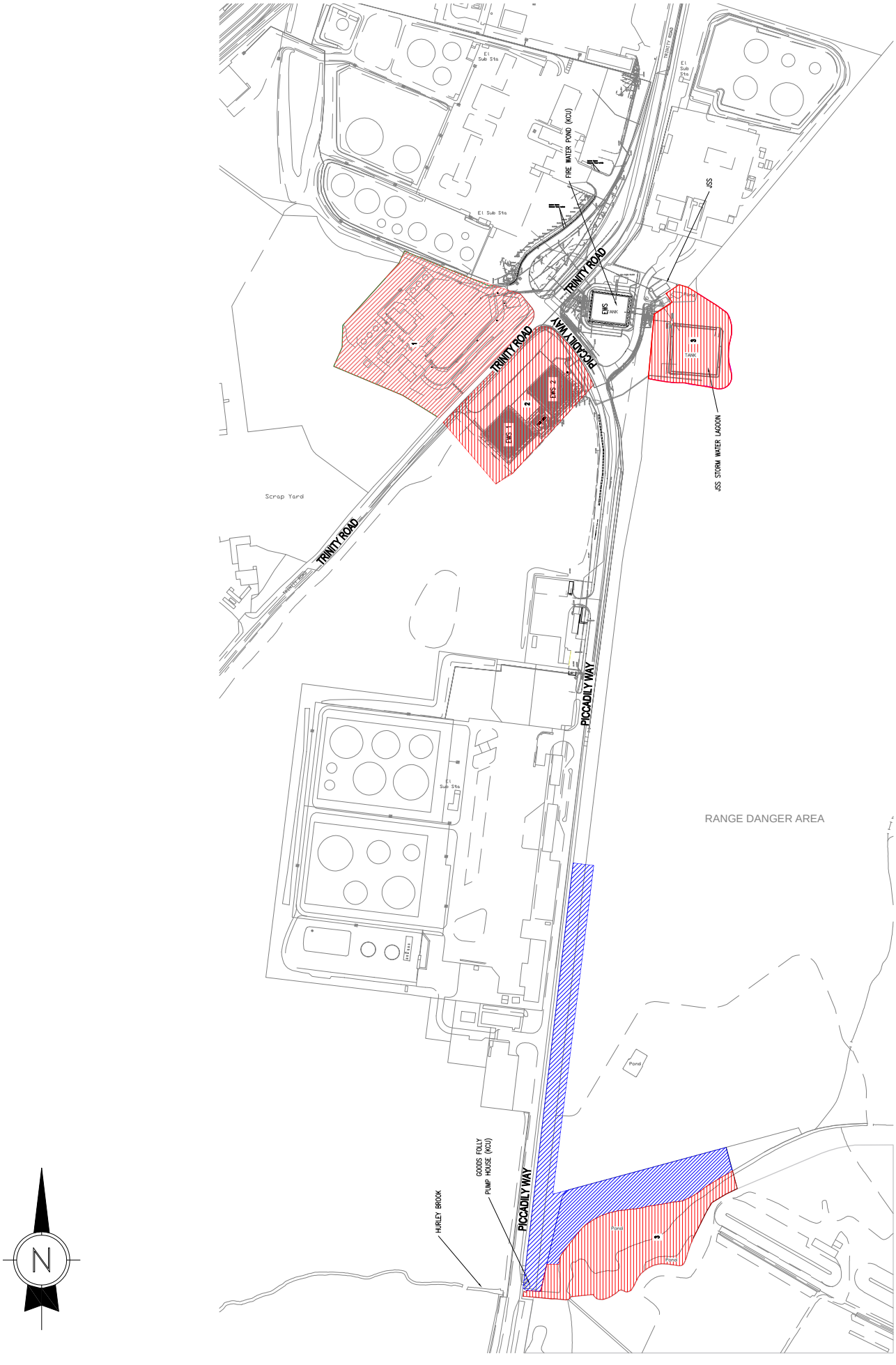
Email

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)**

HOG END LANE
GREEN LANE
OIL ROAD
CHEERY TREE LANE
BUNCEFIELD LANE
1
2
3
4
5


TRINITY ROAD
PICCADILLY WAY
PRE WATER POND (KCU)
DNS
JSS
JSS STORM WATER LAGOON
EMS-1
EMS-2
Scrap Yard
RANGE DANGER AREA
GOODS FOLLY PUMP HOUSE (KCU)
HURLEY BROOK
N

IN THE HIGH COURT OF JUSTICE **Claim No […]**

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 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 KINSGSBURY 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 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 KINSGSBURY 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 comprising 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 Land, 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 comprising 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 TALFAN DAVIES

Name of solicitor's firm FIELDFISHER LLP

Position or office held PARTNER

Signed ..

Claimant's solicitor

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

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

BUSINESS AND PROPERTY DIVISION

PROPERTY TRUSTS AND PROBATE LIST

Before [ ]

On [ ]

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 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

***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 the Order of Master Kaye (Sitting as a Judge of the Chancery Division) reviewing the Gleeson Order and being satisfied that there had been no material change in circumstances warranting the setting aside of the relief granted in the Gleeson Order but making certain amendments to the Gleeson Order (the "**Amended Gleeson Order**") (the "**2025 Order**")

AND UPON a hearing on [ ] for a review of the Amended Gleeson Order, pursuant to paragraph 12 of the Amended Gleeson Order

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

AND UPON the Court reviewing the Amended 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 Amended Gleeson Order save as set out in this Order

IT IS ORDERED THAT:

1. The Amended Gleeson Order shall remain in full force and effect.

2. This Order shall be notified to the First and Second Defendants in accordance with paragraphs 9-11 of the Amended Gleeson Order.

3. Costs reserved.

Claim No. PT-2022-000303

IN THE HIGH COURT OF JUSTICE

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

BUSINESS AND PROPERTY 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



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

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:

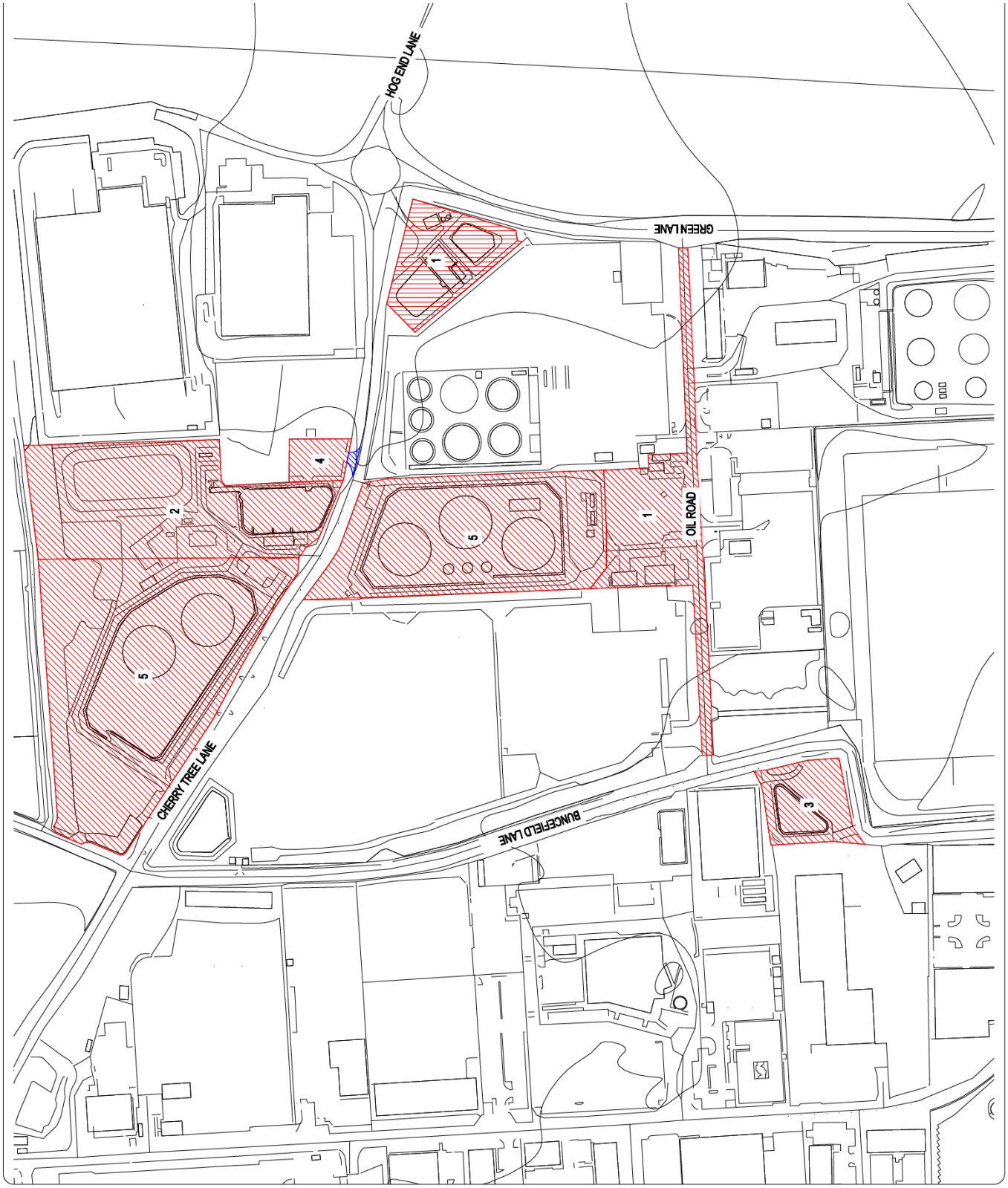
    a) To issue and serve an Application Notice for the return date hearing on 20 April 2022;

    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.

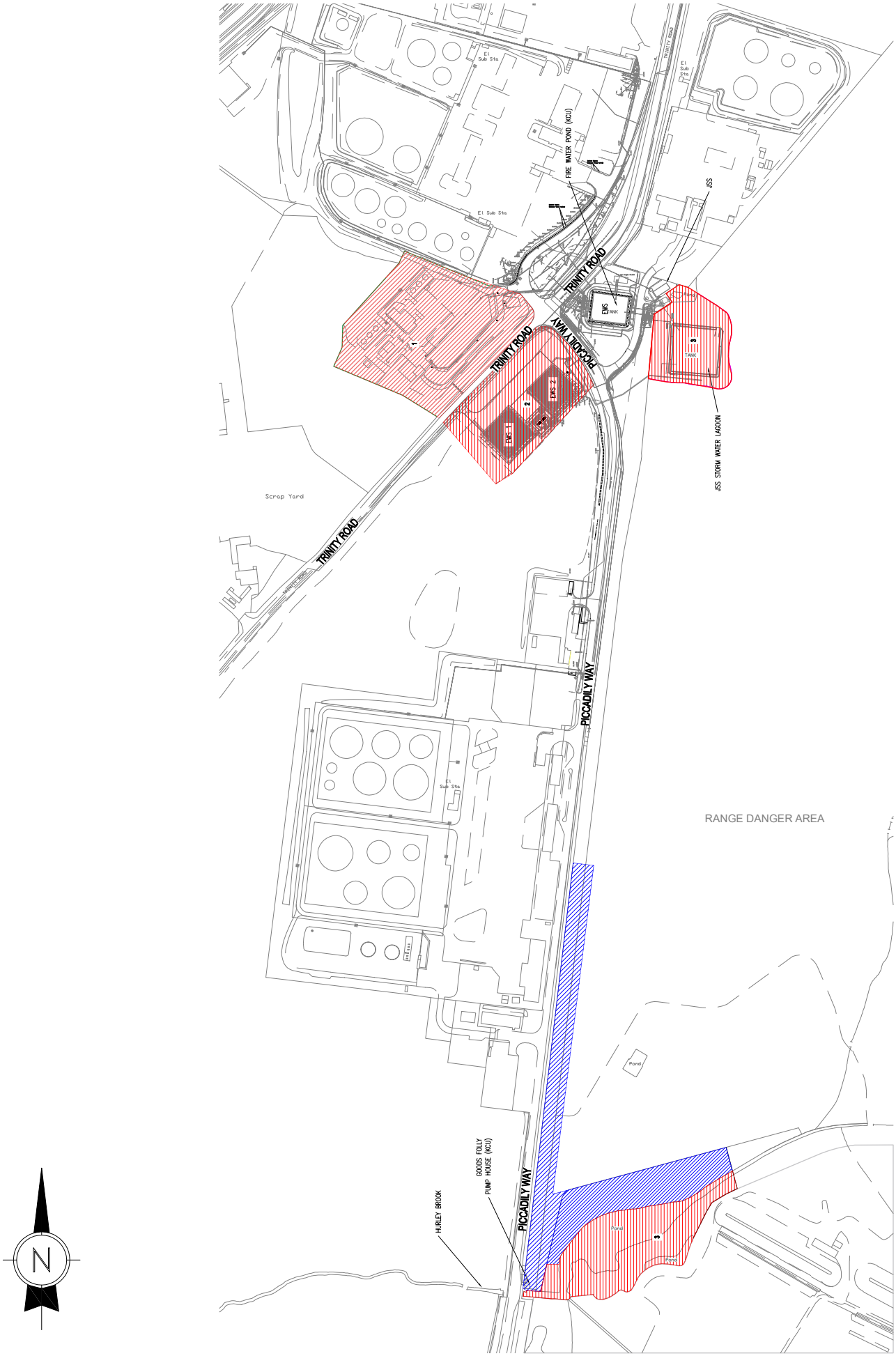
SCHEDULE 4

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


HOG END LANE
GREEN LANE
OIL ROAD
CHERRY TREE LANE
BUNCEFIELD LANE
1
2
3
4
5

SCHEDULE 5

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


TRINITY ROAD
PICCADILLY WAY
PRE WATER POND (KCU)
JSS
JSS STORM WATER LAGOON
EMS-1
EMS-2
EMS TANK
TANK
Scrap Yard
RANGE DANGER AREA
GOODS FOLLY PUMP HOUSE (KCU)
HURLEY BROOK
Pond
N

SCHEDULE 6

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

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/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

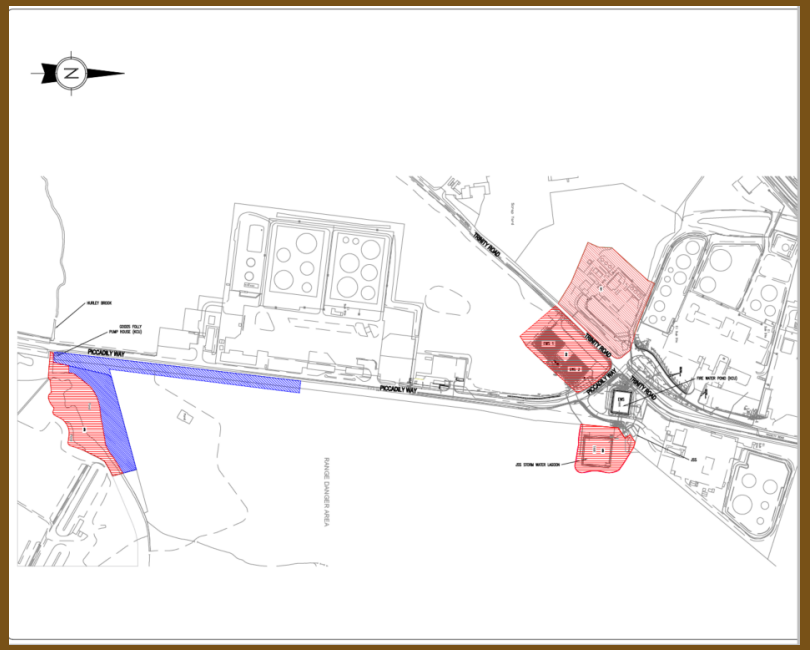
HIGH COURT CLAIM NO: PT – 2022 - 000303

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/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.



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 Peter Knox QC (sitting as a Deputy High Court Judge)

On 20 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 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 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

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 and a note of the hearing on 20 April 2022, 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 a note of the hearing on 20 April 2022 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 a note of the hearing on 20 April 2022 at the following web link: https://ukop.azurewebsites.net;

(c) Fixing warning notices in the form set out in Schedules 6 and 7 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);

(d) Sending an email to each of the following email addresses with the information that copies of the Order and a note of the hearing on 20 April 2022 may be viewed at the web link referred to in paragraph 13(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 and a note of the hearing on 20 April 2022 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 and a note of the hearing on 20 April 2022.

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 (but this is without prejudice to whether the test in s.12(2)(a) of the Human Rights Act 1998 is satisfied at the date of hearing of any future application).

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.

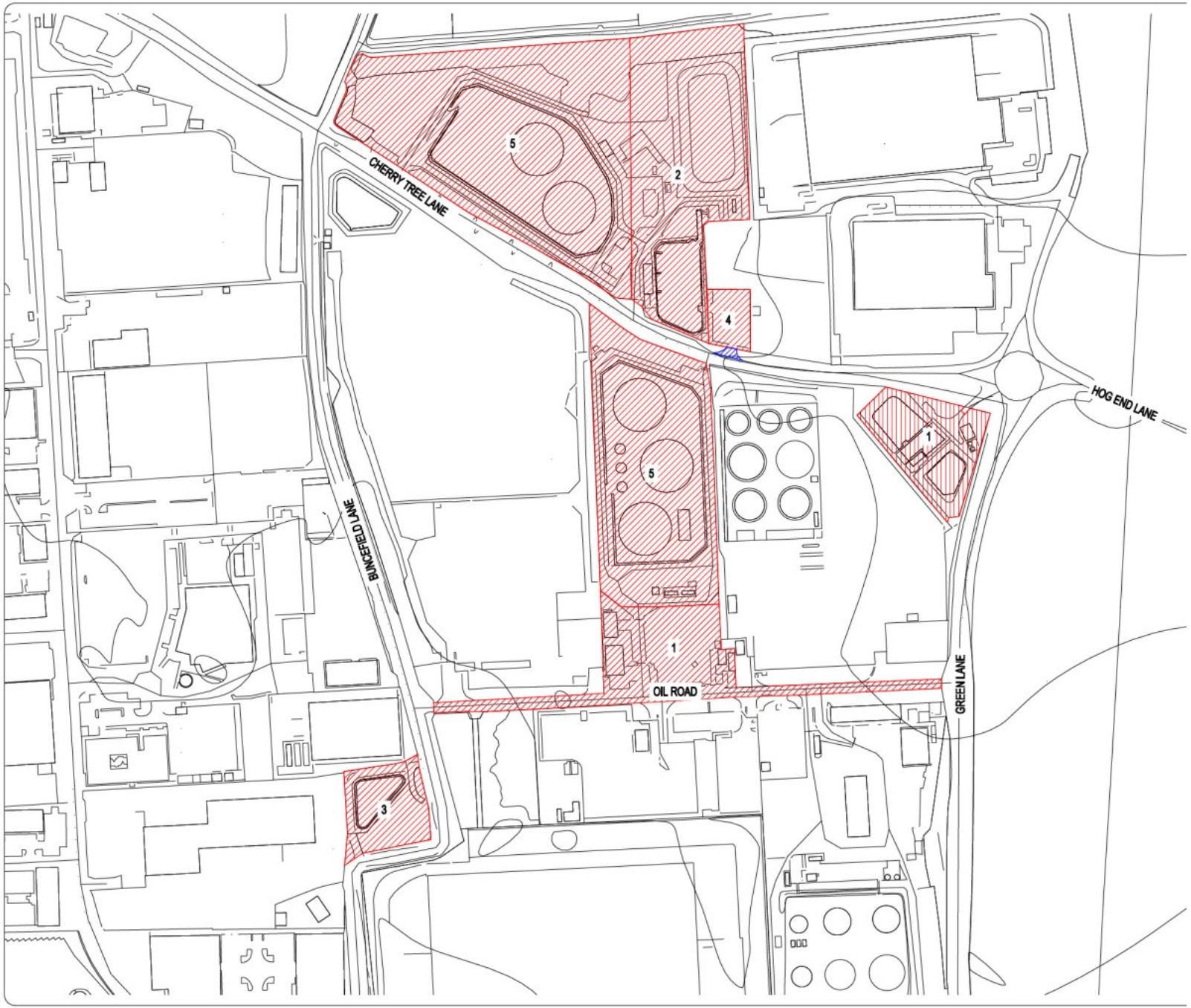
(together, the "**Sites**")

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"**)


CHERRY TREE LANE
BUNCEFIELD LANE
HOG END LANE
GREEN LANE
OIL ROAD
1
2
3
4
5
5

SCHEDULE 5

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


FIRE WATER POND (KCU)
JSS
TRINITY ROAD
EMS
AVIATION ROAD
TRINITY ROAD
JSS STORM WATER LAGOON
Scrap Yard
TRINITY ROAD
PICCADILLY WAY
RANGE DANGER AREA
Pond
GOODS FOLLY PUMP HOUSE (KCU)
HURLEY BROOK
PICCADILLY WAY
N

SCHEDULE 6

SEE ATTACHED SITE 1 NOTICE

HIGH COURT CLAIM NO: PT – 2022 - 000303

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 20 APRIL 2023 OR FURTHER ORDER, 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, FINED 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.

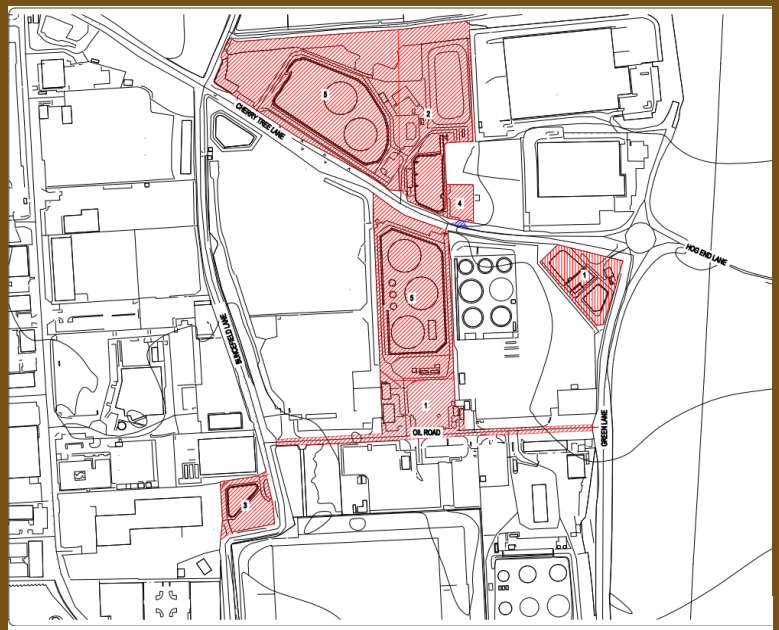
Copies of the Court Order and other documents in the proceedings may be viewed at: https://ukop.azurewebsites.net

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)

ANY FURTHER APPLICATIONS AND SUPPORTING EVIDENCE WILL BE SERVED IN THE WAYS SET OUT IN PARAGRAPH 15 OF THE ORDER.

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.

SCHEDULE 7

SEE ATTACHED SITE 2 NOTICE

HIGH COURT CLAIM NO: PT – 2022 - 000303

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 20 APRIL 2023 OR FURTHER ORDER, 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, FINED 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.

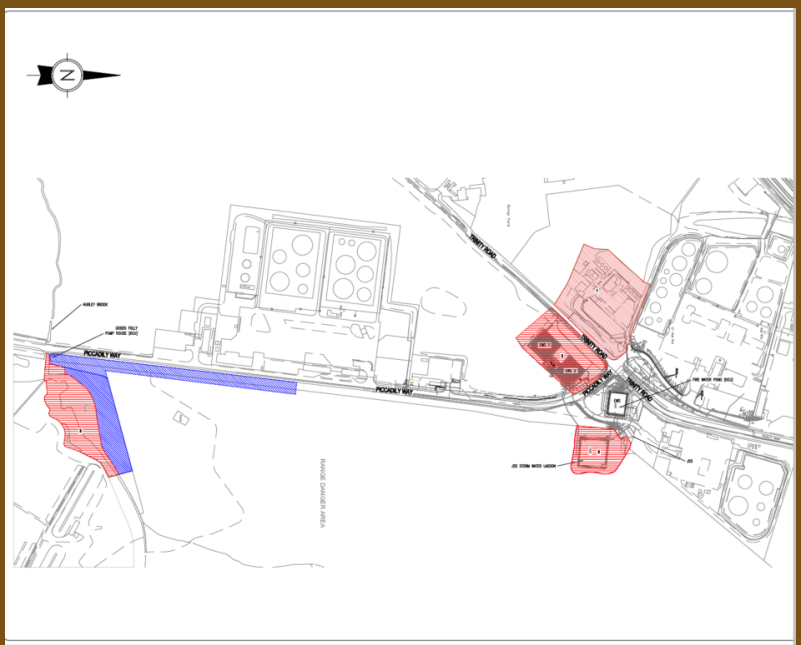
Copies of the Court Order and other documents in the proceedings may be viewed at: https://ukop.azurewebsites.net

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)

ANY FURTHER APPLICATIONS AND SUPPORTING EVIDENCE WILL BE SERVED IN THE WAYS SET OUT IN PARAGRAPH 15 OF THE ORDER.

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

PROPERTY TRUSTS AND PROBATE LIST

Before: The Honourable Mr Justice Rajah

Dated: 20 April 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, 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

FURTHER to the Orders of Peter Knox QC (sitting as Deputy High Court Judge) sealed on 12 April and 21 April 2022

UPON the hearing of the Claimants' Application dated 4 April 2023

AND UPON hearing Katharine Holland KC and Yaaser Vanderman for the Claimants

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

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 20 October 2023, final determination of this claim or further order in the interim, whichever is the earlier:

    (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 4 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 5 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 at a minimum number of 2 prominent locations on the perimeter of each of the Sites;

(c) Fixing warning notices in the form set out in Schedules 6 and 7 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.

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 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 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.

COSTS

12. Costs reserved.

COMMUNICATIONS WITH THE COURT

13. 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 Lane
London
EC4A 1NL

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

14. 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

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
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

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.

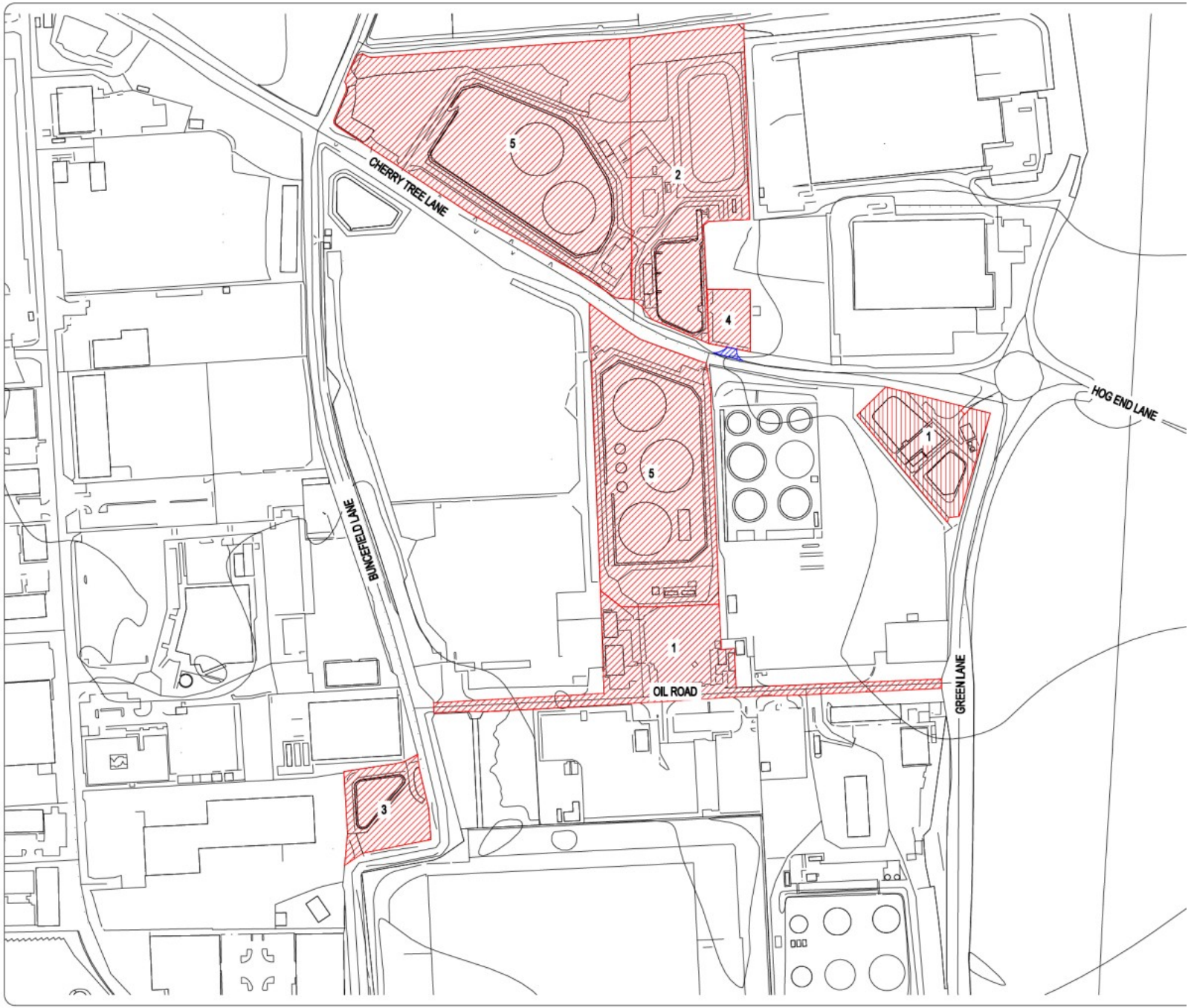
(together, the "**Sites**")

SCHEDULE 3

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.

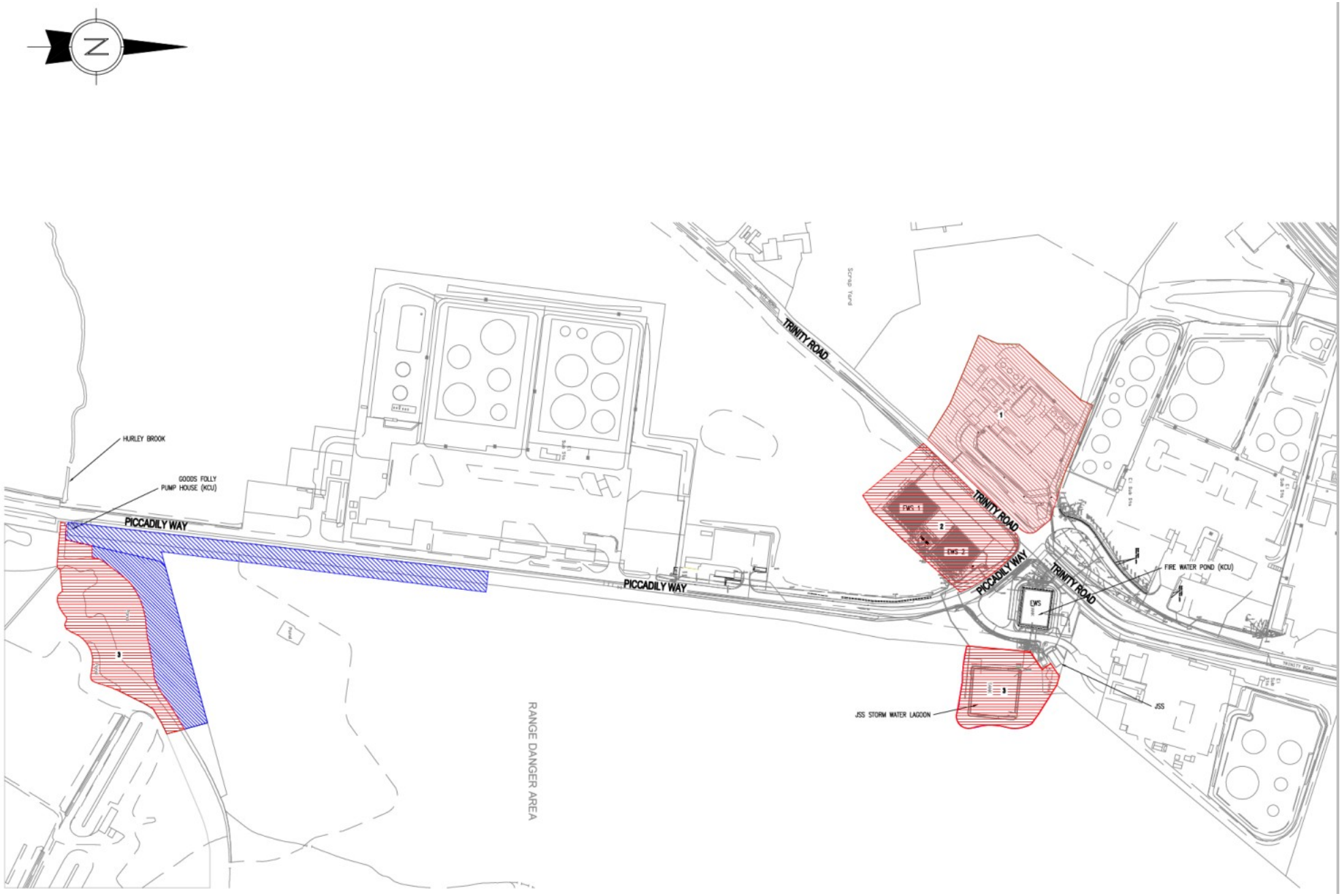
SCHEDULE 4

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


CHERRY TREE LANE
BUNCEFIELD LANE
OIL ROAD
HOG END LANE
GREEN LANE
1
2
3
4
5

SCHEDULE 5

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


N
HURLEY BROOK
GOODS FOLLY
PUMP HOUSE (KCU)
PICCADILY WAY
PICCADILY WAY
TRINITY ROAD
TRINITY ROAD
PICCADILY WAY
TRINITY ROAD
FIRE WATER POND (KCU)
EWS-1
EWS-2
EWS
JSS STORM WATER LAGOON
JSS
RANGE DANGER AREA

SCHEDULE 6

SEE ATTACHED SITE 1 NOTICE

HIGH COURT CLAIM NO: PT – 2022 - 000303

HIGH COURT INJUNCTION IN FORCE

NOTICE OF HIGH COURT ORDER DATED 20 APRIL 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 20 OCTOBER 2023, FINAL DETERMINATION OF THIS CLAIM OR FURTHER ORDER IN THE INTERIM, WHICHEVER IS EARLIER, 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, FINED 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)

ANY FURTHER APPLICATIONS AND SUPPORTING EVIDENCE WILL BE SERVED IN THE WAYS SET OUT IN PARAGRAPH 9 OF THE ORDER.

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.

SCHEDULE 7

SEE ATTACHED SITE 2 NOTICE

HIGH COURT CLAIM NO: PT – 2022 - 000303

HIGH COURT INJUNCTION IN FORCE

NOTICE OF HIGH COURT ORDER DATED 20 APRIL 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 20 OCTOBER 2023, FINAL DETERMINATION OF THIS CLAIM OR FURTHER ORDER IN THE INTERIM, WHICHEVER IS EARLIER, 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, FINED 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.

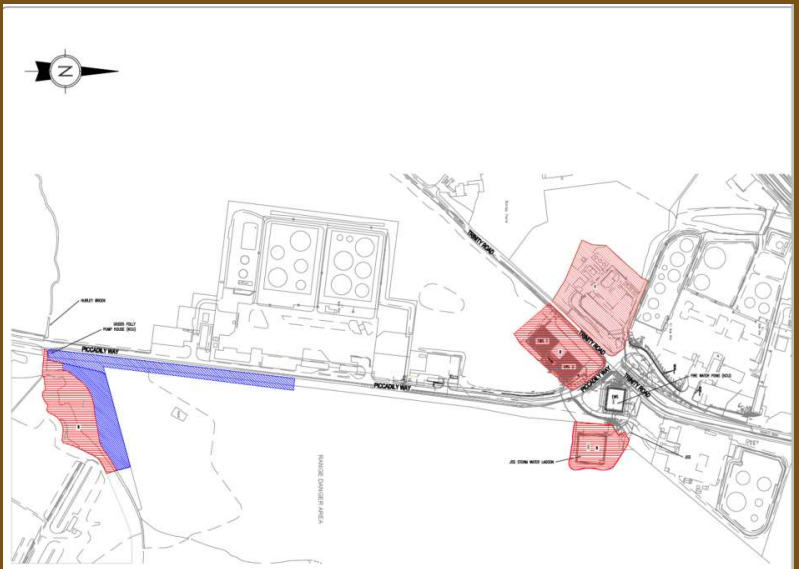
Copies of the Court Order and other documents in the proceedings may be viewed at: https://ukop.azurewebsites.net

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)

ANY FURTHER APPLICATIONS AND SUPPORTING EVIDENCE WILL BE SERVED IN THE WAYS SET OUT IN PARAGRAPH 9 OF THE ORDER.

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 registered which is registered at Land Registry under title number WK522590 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

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, 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

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 at a minimum number of 2 prominent locations on the perimeter 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.

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.

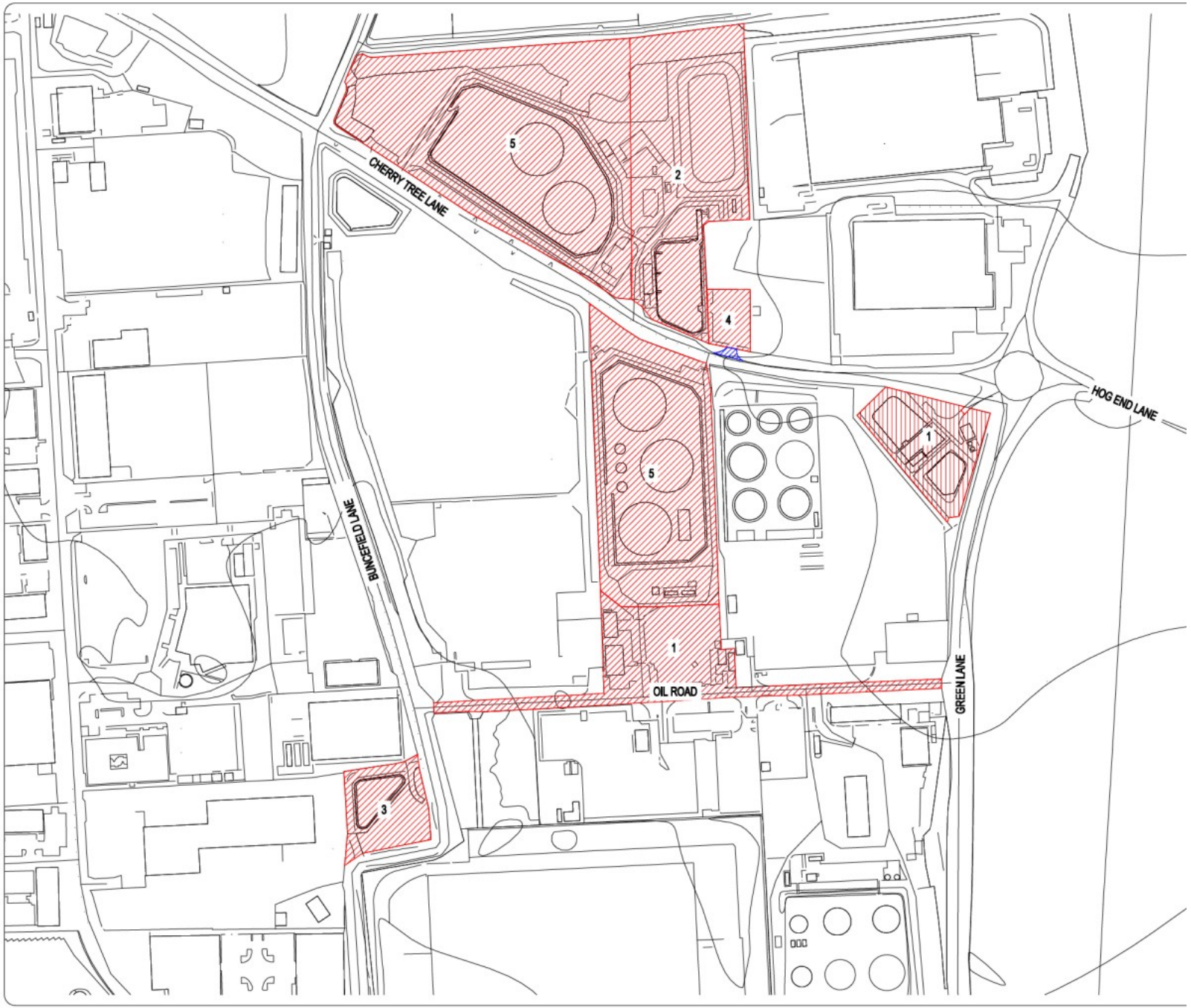
4. The leasehold land at:

   (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 3

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


CHERRY TREE LANE
BUNCEFIELD LANE
OIL ROAD
HOG END LANE
GREEN LANE
1
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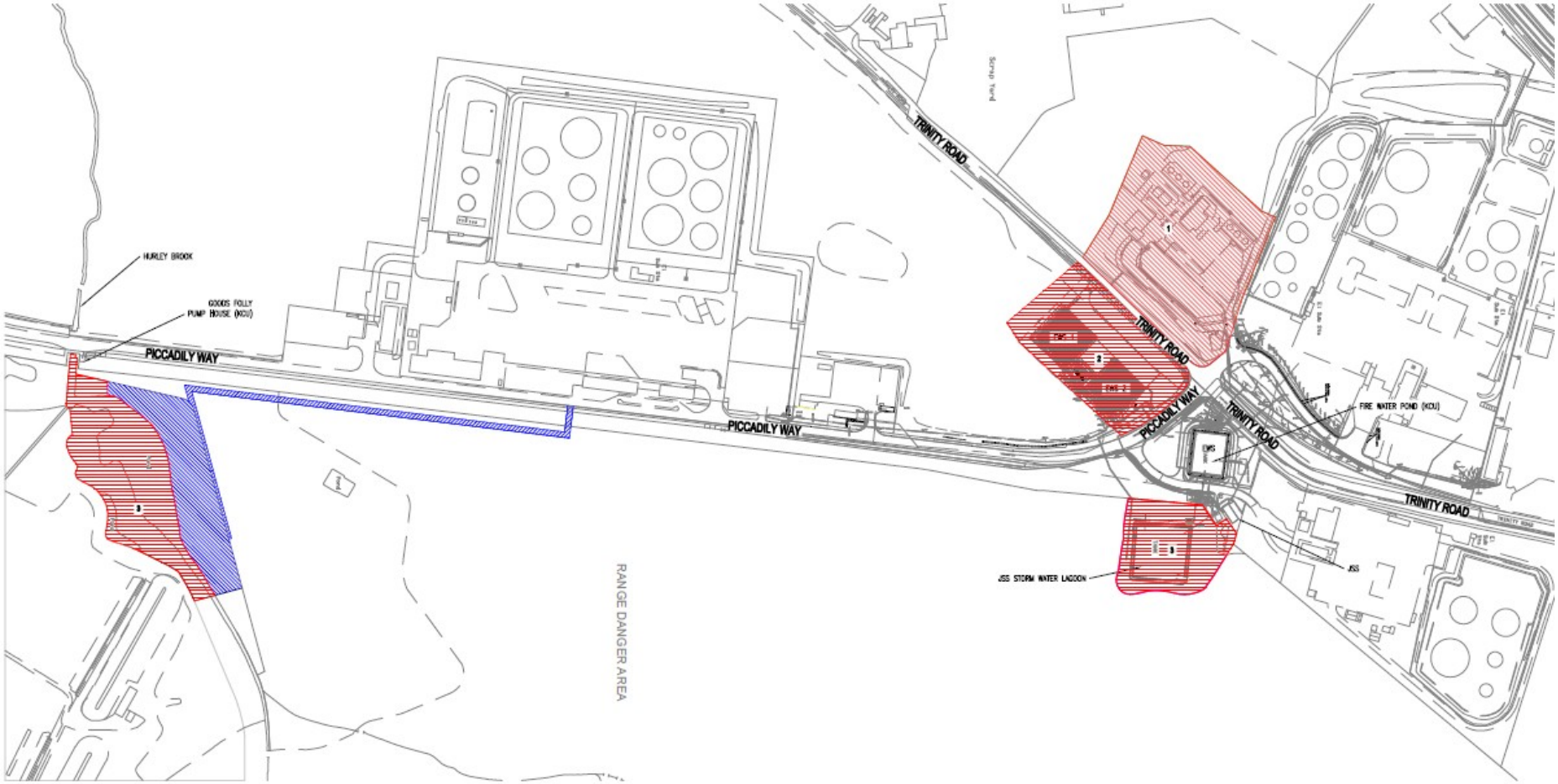
1

SCHEDULE 4

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


N
HURLEY BROOK
GOODS FOLLY
PUMP HOUSE (KCU)
PICCADILY WAY
PICCADILY WAY
TRINITY ROAD
TRINITY ROAD
PICCADILY WAY
TRINITY ROAD
TRINITY ROAD
FIRE WATER POND (KCU)
JSS STORM WATER LAGOON
JSS
RANGE DANGER AREA

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.**

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, FINED 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)

ANY FURTHER APPLICATIONS, NOTICE OF HEARINGS AND SUPPORTING EVIDENCE WILL BE SERVED IN THE WAYS SET OUT IN PARAGRAPH 9 OF THE ORDER.

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.**

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, FINED 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.

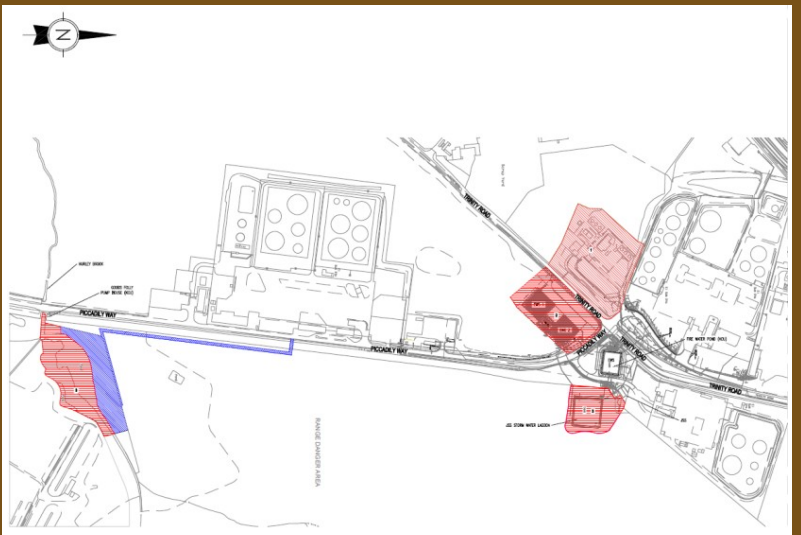
Copies of the Court Order and other documents in the proceedings may be viewed at: https://ukop.azurewebsites.net

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)

ANY FURTHER APPLICATIONS, NOTICE OF HEARINGS AND SUPPORTING EVIDENCE WILL BE SERVED IN THE WAYS SET OUT IN PARAGRAPH 9 OF THE ORDER.

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.



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 Justice Miles

On 20 November 2024

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")

RECITALS

UPON the Orders for interim relief granted in this claim by Mr Peter Knox KC (sitting as a Deputy Judge of the Chancery Division), dated 8 April 2022 and 20 April 2022, and Rajah J, dated 20 April 2023 (the "**Interim Orders**")

UPON 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 a review hearing being listed on 20 November 2024 for a review of the Gleeson Order, pursuant to paragraph 12 of the Gleeson Order

AND UPON the hearing of the Claimants' Application dated 4 November 2024 in relation to service

AND UPON reading the evidence and the Claimants' skeleton argument

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

AND UPON the Court being satisfied that proper and effective service of the Gleeson Order, pursuant to paragraphs 6-8 of the Gleeson Order, and the documents prepared for this hearing, pursuant to paragraphs 9-11 of the Gleeson Order, had been effected on the Defendants

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 in the Gleeson Order

IT IS ORDERED THAT:

1. No Order be made as to the continuing effect of the Gleeson Order.

2. Any requirement in the Interim Orders on the Claimants to continue to fix copies of documents in clear transparent sealed containers, by way of alternative service, be dispensed with.

3. Paragraph 6(b) of the Gleeson Order be amended such that, prospectively, the Claimants be permitted to affix copies of the Gleeson Order in clear envelopes (in substitution for sealed transparent containers) to the perimeter fencing or gates at a minimum number of 2 prominent locations at each of the Sites.

4. This Order be served pursuant to the steps set out in paragraphs 9-11 of the Gleeson Order.

5. Costs reserved.

COMMUNICATIONS WITH THE COURT

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.

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/UK01.000162.00301



PT-2022-000303

IN THE HIGH COURT OF JUSTICE

BUSINESS AND PROPERTY COURTS

OF ENGLAND AND WALES

CHANCERY DIVISION

PROPERTY TRUSTS AND PROBATE LIST

MASTER KAYE (SITTING AS A JUDGE OF THE CHANCERY DIVISION)

13 NOVEMBER 2025

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

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 hearing on 13 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 Yaaser Vanderman 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 the amended notification requirements 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 Amended Gleeson Order.

6. This Order shall be notified to the First and Second Defendants in accordance with paragraphs 9-11 of the Amended 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 – – 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, Hertfordshire, HP2 5BS.

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	

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.

© Crown Copyright

Claim No.	

Does, or will, your claim include any issues under the Human Rights Act 1998? [X] 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

If applicable

Phone number

03304607000

Fax phone number

DX number

Your Ref.

OTD/000162

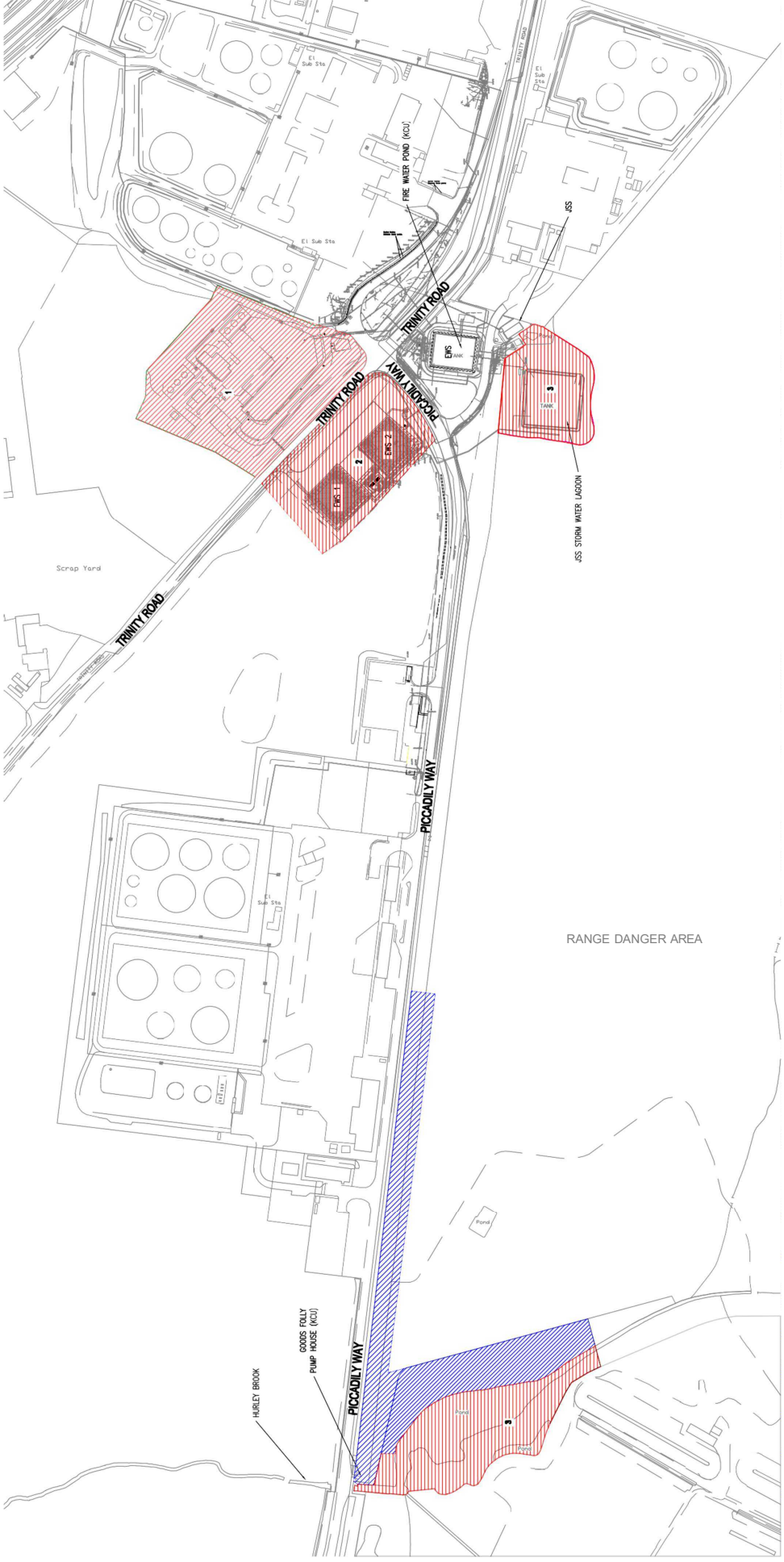
Email

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)**

HOG END LANE
GREEN LANE
OIL ROAD
CHEERY TREE LANE
BUNCEFIELD LANE
1
2
3
4
5


FIRE WATER POND (KCU)
JSS
TRINITY ROAD
PICCADILLY WAY
EWS
TANK
EWS-1
EWS-2
JSS STORM WATER LAGOON
Scrap Yard
RANGE DANGER AREA
Pond
GOODS FOLLY
PUMP HOUSE (KCU)
HURLEY BROOK
N

HIGH COURT OF JUSTICE
09 Dec 2025
THE BUSINESS & PROPERTY COURTS OF ENGLAND & WALES
PT-2022-000303

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 KINSGSBURY 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 KINSGSBURY 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 Land, 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 TALFAN DAVIES

Name of solicitor's firm FIELDFISHER LLP

Position or office held PARTNER

Signed .....

Claimant's solicitor

Schedule 2

Amended Gleeson Order

Amended pursuant to the Order of Master Kaye dated 13 November 2025
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;

(v) youthdemand@proton.me;

(vi) youthdemandpress@protonmail.com;

(vii) shut_the_system_info@proton.me;

(viii) campaigner@fossilfreelondon.org;

(ix) operations@fossilfreelondon.org;

(x) press@citizensarrestnetwork.org; and

(xi) crew@citizensarrestnetwork.org.

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

      (v) youthdemand@proton.me;

      (vi) youthdemandpress@protonmail.com;

      (vii) shut_the_system_info@proton.me;

      (viii) campaigner@fossilfreelondon.org;

      (ix) operations@fossilfreelondon.org;

      (x) press@citizensarrestnetwork.org; and

      (xi) crew@citizensarrestnetwork.org.

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.

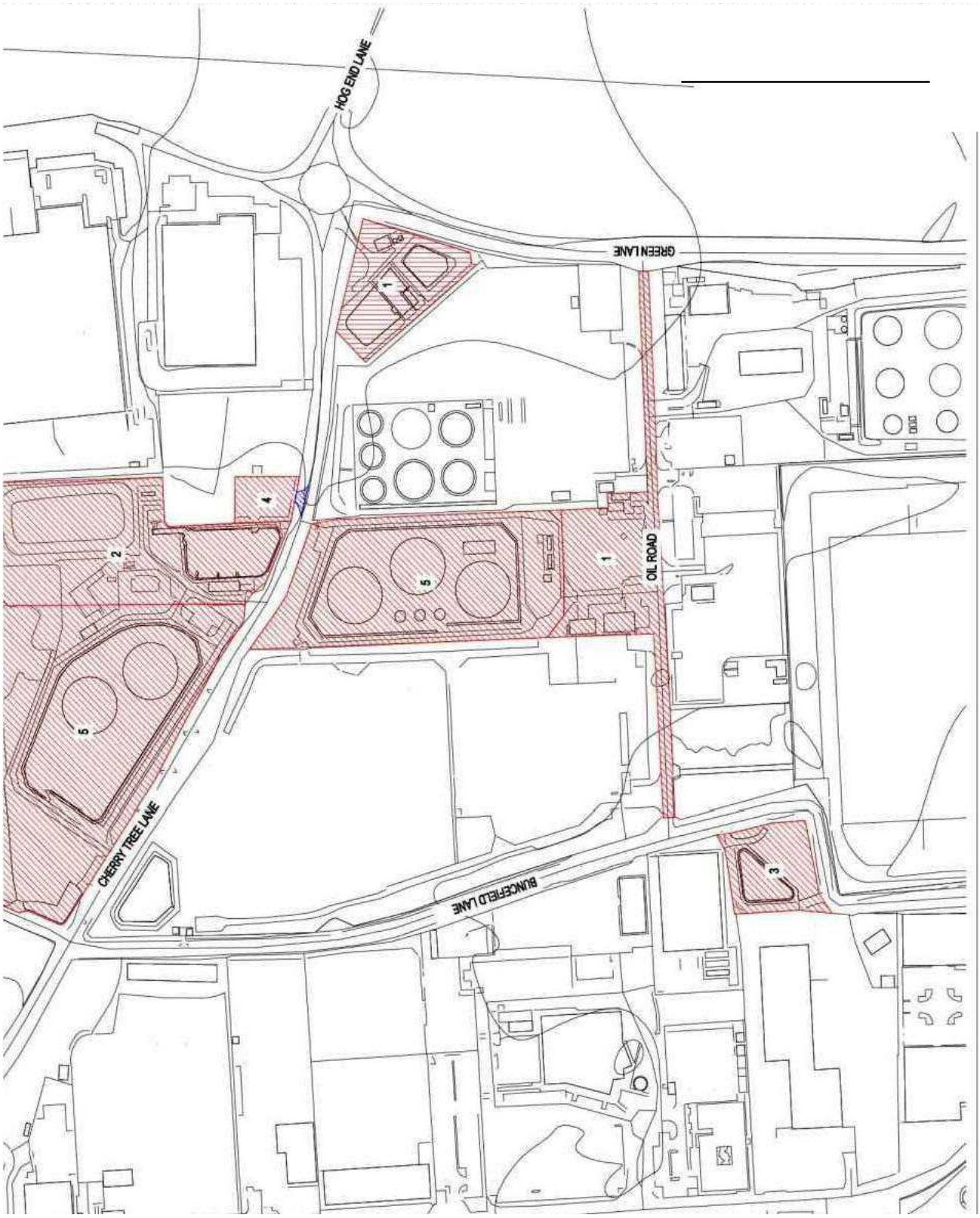
4. The leasehold land at:

(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 3

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


HOG END LANE
GREEN LANE
OIL ROAD
CHERRY TREE LANE
BUNCEFIELD LANE
1
2
3
4
5

SCHEDULE 4

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


TRINITY ROAD
TRINITY ROAD
TRINITY ROAD
TRINITY ROAD
PICCADILLY WAY
PICCADILLY WAY
RANGE DANGER AREA

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 6 OCTOBER 2023 (AS AMENDED ON 13 NOVEMBER 2025)

TO: PERSONS UNKNOWN ACTING IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN AND/OR THE JUST STOP OIL CAMPAIGN AND/OR ANY OTHER ENVIRONMENTAL 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.**

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, FINED 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)

ANY FURTHER APPLICATIONS, NOTICE OF HEARINGS AND SUPPORTING EVIDENCE WILL BE SERVED IN THE WAYS SET OUT IN PARAGRAPH 9 OF THE ORDER.

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 6 OCTOBER 2023 (AS AMENDED ON 13 NOVEMBER 2025)

TO: **PERSONS UNKNOWN ACTING IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN AND/OR THE JUST STOP OIL CAMPAIGN AND/OR ANY OTHER ENVIRONMENTAL 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.**

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, FINED 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)

ANY FURTHER APPLICATIONS, NOTICE OF HEARINGS AND SUPPORTING EVIDENCE WILL BE SERVED IN THE WAYS SET OUT IN PARAGRAPH 9 OF THE ORDER.

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.

Amended pursuant to the Order of Master Kaye dated 13 November 2025
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;

(v) youthdemand@proton.me;

(vi) youthdemandpress@protonmail.com;

(vii) shut_the_system_info@proton.me;

(viii) campaigner@fossilfreelondon.org;

(ix) operations@fossilfreelondon.org;

(x) press@citizensarrestnetwork.org; and

(xi) crew@citizensarrestnetwork.org.

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

      (v) youthdemand@proton.me;

      (vi) youthdemandpress@protonmail.com;

      (vii) shut_the_system_info@proton.me;

      (viii) campaigner@fossilfreelondon.org;

      (ix) operations@fossilfreelondon.org;

      (x) press@citizensarrestnetwork.org; and

      (xi) crew@citizensarrestnetwork.org.

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.

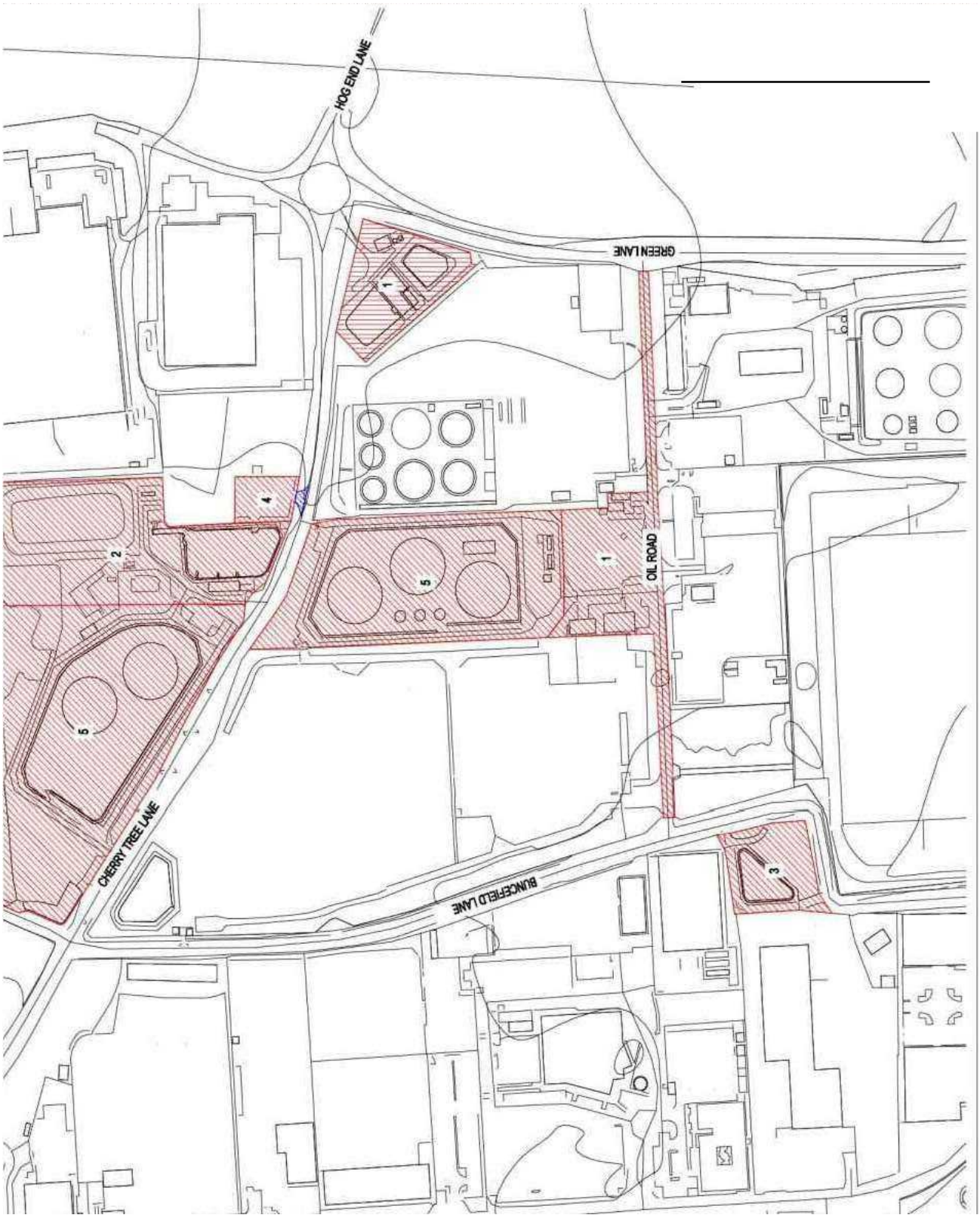
4. The leasehold land at:

(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 3

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


HOG END LANE
GREEN LANE
OIL ROAD
CHERRY TREE LANE
BUNCEFIELD LANE
1
2
3
4
5

SCHEDULE 4

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


TRINITY ROAD
TRINITY ROAD
TRINITY ROAD
TRINITY ROAD
PICCADILLY WAY
PICCADILLY WAY
RANGE DANGER AREA

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 6 OCTOBER 2023 (AS AMENDED ON 13 NOVEMBER 2025)

TO: PERSONS UNKNOWN ACTING IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN AND/OR THE JUST STOP OIL CAMPAIGN AND/OR ANY OTHER ENVIRONMENTAL 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.**

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, FINED 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)

ANY FURTHER APPLICATIONS, NOTICE OF HEARINGS AND SUPPORTING EVIDENCE WILL BE SERVED IN THE WAYS SET OUT IN PARAGRAPH 9 OF THE ORDER.

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 6 OCTOBER 2023 (AS AMENDED ON 13 NOVEMBER 2025)

TO: **PERSONS UNKNOWN ACTING IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN AND/OR THE JUST STOP OIL CAMPAIGN AND/OR ANY OTHER ENVIRONMENTAL 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.**

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, FINED 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)

ANY FURTHER APPLICATIONS, NOTICE OF HEARINGS AND SUPPORTING EVIDENCE WILL BE SERVED IN THE WAYS SET OUT IN PARAGRAPH 9 OF THE ORDER.

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.

HM Courts & Tribunals Service

HM Courts & Tribunal Service
Business and Property Courts of England and Wales
Chancery Listing Office
Rolls Building
7 Rolls Buildings
London
EC4A 1NL
DX 160040 Strand 4
T 020 7947 6690
Email:
chanceryjudgeslisting@justice.gov.uk
www.justice.gov.uk

Email to:

cole.cannings@fieldfisher.com
faye.hyland@fieldfisher.com

Date: 01.10.26

Take notice that an appointment to fix a date for the review hearing of the injunction order pursuant to paragraph 12 of the Amended Gleeson Order has been made for:

Case reference: PT-2022-000303
Case Title: United Kingdom Oil Pipelines Limited and another v Persons Unknown (as per the application)

Please send through your dates to avoid via email to chanceryjudgeslisting@justice.gov.uk **by 11:00am on 8 October 2026.**

If you wish to attend in person to discuss and list this matter please email the listing officers at chanceryjudgeslisting@justice.gov.uk confirming when yourself and the other party representatives intend to attend the list office.

If attendance is confirmed please attend at:

Counter 9, Ground Floor, The Rolls Building, 7 Rolls Building, London, EC4A 1NL

Please provide dates to avoid/of availability within the specified hearing window https://www.gov.uk/guidance/trial-date-windows-for-chancery-division - Failing availability being given a date will not be supplied and parties will be required to contact the office for a further appointment.

Please note this is not a Judicial hearing and is only to arrange a hearing date.

Yours Faithfully

Amira Mohamed

Chancery Listing Office

INVESTOR IN PEOPLE

HM Courts & Tribunal Service
Business and Property Courts of England and Wales
Rolls Building
7 Rolls Buildings
London
EC4A 1NL
DX 160040 Strand 4
T 020 7947 6690
Email :
chanceryjudgeslisting@justice.gov.uk
www.justice.gov.uk

Emailed to:

tom.bennett@brickcourt.co.uk
stewart.cameron@brickcourt.co.uk

Date: 14-10-2026

Case reference: **PT-2022-000303**
Case Title: **United Kingdom Oil Pipelines Limited and another v Persons Unknown (as per the application)**

Notice of Hearing Date

Pursuant to paragraph 12 of the order of Mr Simon Gleeson dated 6 October 2023, the hearing to review this final injunction order has been listed in a 3-day window from the 1st December 2026 with a time estimate of half a day.

Information regarding the listing of this case can be found on the Justice website https://www.court-tribunal-hearings.service.gov.uk/summary-of-publications?locationId=111 at approximately 2pm on the previous working day.

Claimants to give notice of appointment to all other parties

Yours Faithfully

Asifa Ali,
Listing Office

INVESTOR IN PEOPLE

DocuSign Envelope ID: A549A7DD-FA2E-4257-A7BD-AAD0EE4F1E7B

Party: Claimant
Witness: Peter Malcolm Davis
Exhibit: UKOP1
Dated: 7 April 2022

IN THE HIGH COURT OF JUSTICE **Claim No. [……]**
BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES
CHANCERY DIVISION
PROPERTY TRUSTS AND PROBATE LIST

(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

FIRST WITNESS STATEMENT OF

PETER MALCOLM DAVIS

I, Peter Malcolm Davis, of 5-7 Alexandra Road, Hemel Hempstead, Hertfordshire will say as follows:

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1. I currently act as a Consultant on behalf of British Pipeline Agency Limited ("**BPA**") and have held this role since September 2021. I have worked for BPA for over thirty-five years and prior to becoming a consultant, and since 2000, I was a Director and General Manager of BPA.

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. BPA acts as agent for the First Claimant United Kingdom Oil Pipelines Limited ("**UKOP**") and the Second Claimant West London Pipeline and Storage Limited ("**WLPSL**"), and it operates and maintains their UK based assets.

4. I am duly authorised to make this witness statement on behalf of the Claimants.

5. 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. Where I refer to events that occurred before I provided consultancy services to UKOP and WLPSL, my knowledge is based on documentation and/or information that I have been provided with while working at UKOP and WLPSL.

6. Produced and shown to me is a bundle of documents containing exhibit UKOP1. Unless otherwise stated, page references in this witness statement refer to pages in those exhibit bundles.

7. The Claimants make this application to prevent the following protestor activities:

   (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.

8. Pursuant to the foregoing, the Claimants make this application for an order, and I make this witness statement in support of the Claimants' application for an order:

   (a) forbidding the First Defendant and each of them from entering or remaining upon the land and/or buildings described in Schedule 2 to the draft Order (the "**Sites**") and which are shown for illustration purposes shaded red on the plans annexed to Schedules 4 to 5 of the draft Order, and/or from causing damage to, or removing equipment from, the Sites, without the consent of the Claimant.

   (b) forbidding the Second Defendant and each of them from substantially interfering with:

      (i) the First Claimant's rights to pass and re-pass (with or without vehicles and at any time), the private access road on the land adjoining Site 1 (the "**Site 1 Access Route**"), which is shown shaded blue on the plan annexed to Schedule 4 of the draft Order, for access and egress between Site 1 and the public highway; and/or

      (ii) the rights of the First Claimant to pass and re-pass (with or without vehicles and at any time) over the private access road on the land adjoining Site 2 (the "**Site 2 Access Route**"), which is shown shaded blue on the plan annexed to Schedule 5 of the draft Order, for access and egress between Site 2 and the public highway;

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(c) an order permitting service of the Order, and the documents comprising the Claim Form, the Particulars of Claim, the Response Pack and the Application Notice dated 7 April 2022, and witness statements relied upon by the Claimant, by alternative means.

(the "**Application**").

9. This witness statement supplements Mr Armstrong's statement dated 7 April 2022 in which he:

(a) provides evidence of the current operations on each of the Sites;

(b) addresses the health and safety concerns raised by those operations; and

(c) provides evidence of significant unlawful protestor activity that has occurred to date at each of the Sites and similar sites.

10. I have read a draft version of Mr Armstrong's witness statement and whilst I have not seen or reviewed all of the underlying evidence referred to in that statement, I agree with the facts given and statements made therein to the extent that they are within my knowledge.

11. The purpose of this witness statement is to:

(a) provide the Court with details of the parties;

(b) identify the sites which are the subject matter of this Application; and

(c) provide evidence of the Claimants' respective ownership, possession, control and rights in respect of the sites which are the subject matter of this Application.

THE CLAIMANTS

12. As referred to above, BPA acts as agent for the First Claimant, UKOP. The United Kingdom Oil Pipeline (the "**Pipeline**") is an oil products pipeline opened in 1969, owned by UKOP and administered and operated by BPA as agent for UKOP. The Pipeline generally transports in excess of 6 billion litres of product each year and consists of two pipelines, linking the Thames (Essex Coast) and Stanlow via the sites which are the subject of this Application as well as a terminal at Northampton

13. The Second Claimant, WLPSL, is a connected company for whom BPA also act as agent. The WLPSL stores and transports Aviation Fuel via pipeline to Heathrow and Gatwick Airports as well as via road tanker to others generally supplying in excess of 3.5bilion litres of product each year.

THE SITES

14. The properties which are the subject matter of these proceedings comprise land and buildings in various locations in England, namely:

(a) Land and buildings on the north, north east, south and south west of Cherry Tree Lane, Hemel Hempstead and land on the west side of Buncefield Lane, Hemel Hempstead, (together "**Site 1**"), as shown shaded red on the plan exhibited at Schedule 4 of the draft Order (the "**Site 1 Plan**"); and

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(b) Land at Kingsbury and land on the south-east side of Trinity Road, Kingsbury ("**Site 2**"), as shown shaded red on the plan exhibited at Schedule 5 of the draft Order (the "**Site 2 Plan**")

15. Site 1 is the WLPSL Buncefield oil terminal located on the edge of Hemel Hempstead and constructed in 1968. The WLPSL terminal was reconstructed by BPA in 2012 – 2017, having been destroyed in the Buncefield incident in December 2005. The site is one of the largest oil-products storage depot in the UK, with a storage capacity of about 65 million litres of fuel.

16. The site is a major hub on the Pipeline with pipelines to the Stanlow and Lindsey refineries, and Thames oil terminals and is an important fuel source to the British aviation industry, providing aircraft fuel for local airports including Gatwick, Heathrow and Luton airports. About half of the terminal is dedicated to the storage, handling and quality control of aviation kerosene, the remainder transferring refined products (Aviation kerosene, petrol and diesel) to neighbouring terminals.

17. The terminal's functions are:

(a) to receive product from the UKOP and multiproduct pipeline system and divert the flow either to the new terminal managed by BPA, or to the appropriate local tank farms operated by other oil companies;

(b) to enable the storage and batching (product quality control recertification) of aviation fuel received from the multi-product pipeline systems;

(c) to act as the supply depot for aviation kerosene transfer via pipeline to Heathrow and Gatwick Airports; and

(d) to provide loading facilities to allow export of aviation kerosene by road tanker.

18. The WLPSL terminal is of key strategic importance to the UK as a key hub in the distribution of both fuels for ground transport and aviation. Heathrow, Gatwick and Luton airports depend on supplies from the terminal to maintain operations. Furthermore, supplies of diesel and petrol to filling stations across the southeast depend of products transferred through the terminal.

19. BPA acts as a common user agency for the site and has overall responsibility for safety functions on the site including, fire fighting water, water treatment, common drainage and road maintenance.

20. Site 2 is the UKOP Kingsbury Terminal an oil storage depot located to the northeast of the village of Kingsbury in Warwickshire. It was opened in the late 1960s and serves the Midlands region. It receives fuel from the Stanlow refinery as well as the Thames Oil terminals and distributes it to neighbouring terminals.

21. The UKOP Kingsbury terminal is of key strategic importance to the UK providing aviation kerosene to the Midlands Airports and refined products (Diesel, Petrol and Kerosene) to filling stations across the Midlands. The UKOP Kingsbury terminal also hosts the national control centre for multi fuel pipeline operations providing monitoring of the safety of over 1000km of high-pressure pipelines and terminals.

22. BPA also acts as a common user agency for Site 2 and has overall responsibility for safety functions on the site including fire-fighting water, water treatment, common drainage and road maintenance.

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23. In this statement, I describe the Sites in detail and provide evidence of the respective Claimants' ownership, possession, control and rights in respect of the Sites.

SITE 1: BUNCEFIELD

24. The First Claimant is the proprietor of three freehold interests in Site 1, which include:

    (a) The property shaded red and numbered "1" on the Site 1 Plan, being land and buildings on the south side of Cherry Tree Lane, Hemel Hempstead which is registered at the Land Registry under title number HD485114. An official copy of the register and plan of the freehold title appear at **pages 5-9**;

    (b) The property shaded red and numbered "2" on the Site 1 Plan, being land to the north of Cherry Tree Lane, Hemel Hempstead which is registered at the Land Registry under title number HD485115. An official copy of the register and plan of the freehold title appear at **pages 10-14**; and

    (c) The property shaded red and numbered "3" on the Site 1 Plan, being land on the west side of Buncefield Lane, Hemel Hempstead which is registered at the Land Registry under title number HD485116. An official copy of the register and plan of the freehold title appear at **pages 15-18**.

25. In addition, the First Clamant is the proprietor of one leasehold interest in Site 1, which is the property shaded red and numbered "4" on the Site 1 Plan, being land on the north side of Cherry Tree Lane, Hemel Hempstead pursuant to a lease dated 23 September 2013 made between (1) Total UK Limited and (2) United Oil Kingdom Pipelines Limited (the "**Site 1 Lease**") which is registered at the Land Registry under title number HD529733. An official copy of the register and plan of the leasehold title appear at **pages 19-24**. A copy of the Site 1 Lease is exhibited at **pages 25-113**.

26. Pursuant to clause 2, Schedule 1 of the Site 1 Lease, the First Claimant enjoys a right at all times or without vehicles to enter upon and to pass over and across the accessway forming part of the landlord of the Site 1 Lease's retained land (the "**Land Adjoining Site 1**") for the purpose of gaining access to and egress from Site 1 to the public highway.

27. The access track leading from the public highway to Site 1 which forms part of the Land Adjoining Site 1 is shown coloured blue on the Site 1 Plan (the "**Site 1 Access Route**").

28. The Second Claimant is the proprietor of a further freehold interest in Site 1. This is the property shaded red and numbered "5" on the Site 1 Plan, being land on the north east and south west side of Cherry Tree Lane, Hemel Hempstead, and which is registered at the Land Registry under title number HD485118. An official copy of the register and plan of the freehold title appear at **pages 114-117**.

SITE 2: KINGSBURY

29. The First Claimant is the proprietor of two freehold interests in Site 2, which include:

    (a) The property shaded red and numbered "1" on the Site 2 Plan, being all that piece of land at Kingsbury in the County of Warwick comprising 4.96 acres or thereabouts. The property, which is unregistered, was conveyed to the Claimant pursuant to an conveyance between Shell-Mex and B.P. Limited (1) and the Claimant (2) dated 31 March 1967, which conveyance appears at **pages 129-133**; and

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(b) The property shaded red and numbered "2" on the Site 2 Plan, being the land on the south-east side of Trinity Road, Kingsbury, Tamworth and which is registered at the Land Registry under title number WK468465. An official copy of the register and plan of the freehold title appear at **pages 134-139**.

30. In addition, the First Claimant is the proprietor of one leasehold interest in Site 2, which is the property shaded red and numbered "3" on the Site 2 Plan, being land at Kingsbury in the County of Warwick pursuant to a lease dated 3 November 2021 made between (1) The Secretary of State for Defence and (2) United Oil Kingdom Pipelines Limited (the "**Site 2 Lease**").

31. The Site 2 Lease is pending registration at the Land Registry but falls within freehold title number WK455852 (see official copies at **pages 140-145**.) A copy of the Site 2 Lease is exhibited at **pages 146-170**.

32. Pursuant to clause 2 of the Site 2 Lease, the First Claimant 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 of the Site 2 Lease's retained land (the "**Land Adjoining Site 2**") for the purpose of gaining access to and egress from Site 2 to the public highway.

33. The access track leading from the public highway to Site 2 which forms part of the Land Adjoining Site 2 is shown coloured blue on the Site 2 Plan (the "**Site 2 Access Route**").

FURTHER INFORMATION ABOUT THE SITES

34. In the paragraphs that follow I give evidence in relation to:

(a) the means of access to and egress from each of the Sites; and

(b) the physical appearance of the boundaries of the Sites, including any physical barriers and deterrents to entry.

SITE 1: BUNCEFIELD

35. As referred to at paragraphs 24 to 27 above, the First Claimant has the benefit of three freehold interests in Site 1, namely the properties shaded red and numbered 1, 2 and 3 on the Site 1 Plan and one leasehold interest in Site 1, namely the property shaded red and numbered 4 on the Site 1 Plan. The Second Claimant has the benefit of one freehold interest in Site 1, namely the property shaded red and numbered 5 on the Site 1 Plan.

36. In respect of the property shaded red and numbered "1" on the Site 1 Plan, this property constitutes the main site at the Buncefield terminal complex and comprises pipeline reception facilities, offices and a control room together with a water treatment plant for all surface water from the complex. Within the boundary of the property is Oil Road, which is a private road running from Green Lane to the East through Site 1.

37. In respect of the property shaded red and numbered "2" on the Site 1 Plan, this property comprises:

(a) the main fire water pond for the complex;

(b) the fire pumps for the complex;

(c) the fire control point for the complex;

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(d) used firewater storage for the complex; and

(e) additional pipeline reception facilities

38. In respect of the property shaded red and numbered "3" on the Site 1 Plan, this property comprises a back-up fire pond for the complex. It is separated geographically from the rest of the complex by Buncefield Lane.

39. In respect of the property shaded red and numbered "4" on the Site 1 Plan, this property is used as a hard standing area for keeping and operating fire tenders and ancillary pumps and equipment to be used by the emergency services during emergency response events or rehearsals of such events at the terminal.

40. In respect of the property shaded red and numbered "5" on the Site 1 Plan, this property comprises two parcels of land and buildings which together contain the Second Claimant's storage and pipeline systems:

(a) the Northern site (commonly referred to as Cherry Tree Farm) which has two 2 tanks; and

(b) the Southern site which has large storage tanks and three smaller storage tanks

41. The main entrance providing access to and egress from Site 1 is to the right of Oil Road at the bottom right of the Site 1 Plan which leads right onto Green Lane and then on to the M1. The main entrance is gated. These gates are set back from the visibility splay and need to be permanently open when the terminal is operational to allow for free flow of access and egress. There is a further entrance to Site 1 to the left of Oil Road at the bottom left of the Site 1 Plan which leads onto Buncefield Lane. This entrance is gated and the gates are permanently closed. There are various smaller site maintenance and emergency access routes off Cherry Tree Lane (also known as Three Cherry Trees Lane).

42. Site 1 is surrounded by a perimeter fence and there is in place a site security system including CCTV, site lighting and access control.

SITE 2: KINGSBURY

43. As referred to at paragraphs 29 to 33 above, the First Claimant has the benefit of two freehold interests and one leasehold interest in Site 2, namely the properties shaded red and numbered 1, 2, and 3 on the Site 2 Plan.

44. In respect of the property shaded red and numbered 1 on the Site 2 Plan, this comprises the main site at the Kingsbury terminal and 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 WLPSL storage site and WLPSL pipelines for Heathrow and Gatwick Airports providing all control and safety monitoring functions.

45. In respect of the property shaded red and numbered 2 on the Site 2 Plan, this comprises the firefighting system of two fireponds and a FIRE pumphouse.

46. In respect of the property shaded red and numbered 3 on the Site 4 Plan, this comprises a firewater pond for the terminal and a balancing pond. The firewater pond supplies firewater for the Kingsbury terminal and other neighbouring terminals owned by other operators and is required for day-to-day operations. The balancing pond is for site drainage water (surface water) for storage and

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disposal. Fire water pipelines are situated between the firewater pond and the balancing pond and which are primarily located under Piccadilly Way.

47. The main access to Site 2 is via Piccadilly Way and Trinity Road at the bottom left of the Site 2 Plan which then leads onto a private access road serving both the main site (numbered 1 on the Site 2 Plan) and the terminal facilities to the north of the site.

48. Site 2 is surrounded by a perimeter fence and there is in place a site security system including CCTV, site lighting and access control. The central security control Centre for the monitoring of all UKOP and WLPSL sites is within the Kingsbury site (shaded red and numbered 1 on the Site 2 Plan).

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

DocuSigned by:
Signed: Peter Davis 3C9737B4C1C3477... Dated: 07/04/2022

Peter Malcolm Davis

DocuSign Envelope ID: 6D87720D-25E3-4351-83B4-4507FBE81BCD

Party: Claimant
Witness: John Michael Armstrong
Exhibit: UKOP 1 and UKOP2
Dated: 7 April 2022

IN THE HIGH COURT OF JUSTICE **Claim No. [……]**
BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES
CHANCERY DIVISION
PROPERTY TRUSTS AND PROBATE LIST

(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

JOHN MICHAEL ARMSTRONG

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

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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 are two bundles of documents containing exhibit UKOP 1 and UKOP2. Unless otherwise stated, page references in this witness statement refer to pages in those exhibit bundles.

6. The Claimants make this application to prevent 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.

7. Pursuant to the foregoing, the Claimants make this application for an order, and I make this witness statement in support of the Claimants' application for an order:

   (a) forbidding the First Defendant and each of them from entering or remaining upon the land and/or buildings described in Schedule 2 to the draft Order (the "**Sites**") and which are shown for illustration purposes shaded red on the plans annexed to Schedules 4 to 5 of the draft Order, and/or from causing damage to, or removing equipment from, the Sites, without the consent of the Claimant.

   (b) forbidding the Second Defendant and each of them from substantially interfering with:

      (i) the First Claimant's rights to pass and re-pass (with or without vehicles and at any time), the private access road on the land adjoining Site 1 (the "**Site 1 Access Route**"), which is shown shaded blue on the plan annexed to Schedule 4 of the draft Order, for access and egress between Site 1 and the public highway; and/or

      (ii) the rights of the First Claimant to pass and re-pass (with or without vehicles and at any time) over the private access road on the land adjoining Site 2 (the "**Site 2 Access Route**"), which is shown shaded blue on the plan annexed to Schedule 5 of the draft Order, for access and egress between Site 2 and the public highway;

   (c) an order permitting service of the Order, and the documents comprising the Claim Form, the Particulars of Claim, the Response Pack, the Application Notice dated 7 April 2022, the evidence relied upon by the Claimants, an Application Notice in respect of the Return

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Date hearing and any further evidence to be relied upon on the Return Date ("**the Court Documents**") .

(the "**Application**").

8. Mr Davis' witness statement dated 7 April 2022 in which he provides details of the parties, identifies the sites which are the subject matter of this Application and provides evidence of the Claimants' respective ownership, possession, control and rights in respect of those sites supplements this witness statement.

9. I have read a draft version of Mr Davis' witness statement and whilst I have not seen or reviewed all of the underlying evidence referred to in that statement, I agree with the facts given and statements made therein to the extent that they are within my knowledge.

10. The purpose of this witness statement is to provide the Court with evidence of the current operations on each of the Sites that are the subject of this Application. I also address the health and safety concerns raised by those operations, and provide evidence of significant unlawful direct action that has occurred to date at each of the Sites and similar sites.

11. The evidence that is set out below, along with the evidence referred to in Mr Davis' witness statement, is intended to demonstrate why the Claimants are concerned that there is a real and imminent risk of unlawful acts occurring on and around the Sites absent the orders sought in the Application.

THE CLAIMANTS

12. The United Kingdom Oil Pipeline (the "**Pipeline**") is an oil products pipeline opened in 1969, owned by the First Claimant, UKOP, and administered and operated by BPA as agent for UKOP. The Pipeline generally transports in excess of 6 billion litres of product each year and consists of two pipelines, linking the Thames (Essex Coast) and Stanlow via the sites which are the subject of this Application as well as a terminal at Northampton

13. The Second Claimant, WLPSL, is a connected company for whom BPA also act as agent. The WLPSL stores and transports aviation fuel via pipeline to Heathrow and Gatwick Airports as well as via road tanker to others generally supplying in excess of 3.5bilion litres of product each year.

THE SITES

14. The properties which are the subject matter of these proceedings comprise land and buildings in various locations in England, namely:

    (a) Land and buildings on the north, north east, south and south west of Cherry Tree Lane, Hemel Hempstead and land on the west side of Buncefield Lane, Hemel Hempstead, (together "**Site 1**"), as shown shaded red on the plan exhibited at Schedule 4 of the draft Order (the "**Site 1 Plan**"); and

    (b) Land at Kingsbury and land on the south-east side of Trinity Road, Kingsbury ("**Site 2**"), as shown shaded red on the plan exhibited at Schedule 5 of the draft Order (the "**Site 2 Plan**")

15. The witness statement of Mr Davis describes in detail the geographical extent of, and the Claimants' various interests in, the Sites.

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ACTIVITIES ON THE SITES AND ASSOCIATED HEALTH AND SAFETY ISSUES

16. The nature of the operations at the Sites is such that any unlawful interference by trespassers and/or those carrying out direct action would pose a significant risk of damage and/or injury to persons and property, including to such trespassers and those carrying out direct action.

17. In this section, I summarise in relation to the Sites:

    (a) the current activities on the Sites including:

        (i) the nature of the activities;

        (ii) the nature of the plant and equipment which will be taken to and/or from and/or retained on the Sites during the activities;

        (iii) the nature of any hazards on the Sites during the activities and any hazardous materials being taken to and from the Sites;

        (iv) risks to trespassers and those carrying out direct action during these activities; and

    (b) current security measures in place on the Sites.

SITE 1 (BUNCEFIELD): ACTIVITIES/HEALTH AND SAFETY CONCERNS

18. As more particularly set out in Mr Davis' witness statement, Site 1 is the WLPSL Buncefield oil terminal.

19. The primary activities undertaken on Site 1 are:

    (a) the storage of aviation kerosene for onwards transmission to Heathrow and Gatwick airports;

    (b) the transfer of fuel products to neighbouring terminal;

    (c) road loading of aviation kerosene; and

    (d) storage of 'interface' material created as part of the Pipeline operation. Interface material is typically a mixture of fuels including petrol, kerosene and aviation kerosene.

20. Site 1 has experienced direct action in the form summarised at paragraphs 44(a) to (d) below. The Claimants believe that substantial direct action will continue. Such action will present significant practical, financial and logistical implications for the Claimants, many other third parties and potentially the UK economy, not to mention substantial health and safety risks as referred to in the following paragraphs. For that reason, the Claimants consider it necessary to seek judicial protection in the form of the orders sought.

21. Site 1 contains a number of above ground storage tanks for the handling of aviation kerosene and a number of interface tanks and slop tanks. The combined usable capacity of the primary tank is circa 65 million litres of fuel. All of the tanks are located inside impermeable bunds (secondary and tertiary containment) designed to contain any fuel in the event of an accidental release. The bunds comprise a reinforced concrete floor surrounded by reinforced concrete walls (and integrated stainless leak stops at joints).

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22. Tertiary containment facilities comprise paved and surfaced areas draining into a common drainage system that in turn flows into either a treatment plant or a tertiary storage lagoon (constructed specifically for the management of water in emergency situations). Booster pumps deliver stored fuel from the tanks to the mainline high pressure pumps operational on the site. In addition, a series of filtration vessels ensure high standards of fuel quality are sustained. Recirculation pumps allow the movement of fuels within the site boundary. All of these facilities are located in bunded areas connected to a common drainage system.

23. The fire water lagoon provides 4.5 million litres of emergency firefighting water to the WLPSL terminal and to neighbouring sites (see paragraph 35 below).

24. Current onsite hazards on Site 1 include (but are not limited to) the following:

    (a) high pressure pipework, high pressure pumping systems, low pressure pipework and tankage for the handling and storage of hazardous substances including aviation kerosene, kerosene, petrol and diesel fuel;

    (b) high and medium voltage electricity;

    (c) deep water; and

    (d) moving heavy duty vehicles

25. Given the nature of the site and its use, Site 1 is subject to the Control of Major Accident Hazards Regulations 2015 (the "**COMAH Regulations**"). The COMAH Regulations apply to operational establishments which hold dangerous substances at or above the qualifying thresholds in the Regulations. Site 1 is listed as an Upper Tier establishment. Upper Tier establishments hold greater quantities of dangerous substances meaning that additional requirements are placed on them by the COMAH Regulations to ensure compliance. Information is available on the Health and Safety Executive's website in relation to Site 1 and is exhibited at **UKOP1: pages 118-122** of the bundle.

26. The pages exhibited at **UKOP1: pages 118-122** confirm the major accident hazards and scenarios at the site and the control measures that are in place to address them. The nature of major accident hazards include:

    (a) Accidental release of dangerous substances;

    (b) Explosion; and

    (c) Fire.

27. In relation to (a) above, release of liquid may lead to liquid flowing onsite and offsite to sewers, freshwater, estuarine waters, coastal waters, land or groundwater and resulting in damage to people and the environment and environmental pollution and contamination of drinking water supplies. Release of contaminated firewater containing dangerous substances may also contaminate and pollute sewers, freshwater, estuarine waters, coastal waters, land or groundwater. Release of toxic gas or smoke may result in a gas cloud or smoke plume containing dangerous substances.

28. In relation to (b) above, should an explosion occur then the anticipated levels of blast overpressure may be harmful to humans and animals and damage buildings. Projectiles travelling at high speed

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may also spread from the explosion presenting a risk to people, animals and damage buildings. Explosions may also initiate fires.

29. In relation to (c) above, fires could range from an intense fire lasting several seconds to large fires lasting several minutes or hours. There is potential for fire damage to people and the environment and fires may spread to other areas. A drifting cloud of flammable gas may also ignite. Fires may generate smoke clouds which may lead to breathing difficulties and deposition of soot on property and vegetation.

30. Given the risks arising from the above, extensive control measures are in place at the site including the following:

(a) access to the site is strictly controlled;

(b) the site has storage tanks, process vessels, pipework and control systems designed and maintained to prevent major accidents;

(c) arrangements are in place:

(i) for regular safety inspections of plant and processes;

(ii) ensure all employees have the necessary skills and competencies to do their job and deal with any emergencies that arise;

(iii) to inform, instruct, train and supervise the workforce;

(iv) to monitor, track and improve health and safety systems; and

(v) to prevent or minimise loss of containment of dangerous substances

(d) buildings on site are designed and arranged to prevent or minimise knock-on effects of an incident;

(e) containment systems are in place for relevant work areas to minimise the loss of spilled material to the environment;

(f) detectors are in place to alert managers of any loss of containment;

(g) emergency response systems & procedures are in place;

(h) maintenance and inspection is carried out to keep equipment in good working order there is in place a detailed way of working with policy, operating standards and a Health, Safety and Environmental management system to maintain and improve safety and environmental performance;

(i) there is an automatic/manual fire alarm system connected to a central monitoring station and/or the fire service and there are on-site response facilities to reduce the impact of an incident;

(j) isolation procedures are in place to prevent or reduce the extent of an incident and key operating units and storage facilities are fitted with automatic shutdown and isolation systems. Key operating units and storage facilities also have containment systems in place to keep chemicals and firewater on-site and key operating units and/or relevant

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warehouses/storage facilities are fitted with fire detection and/or suppressant and/or protection systems;

(k) procedures are in place to control the activities of contractors or visitors to the site;

(l) there is elimination of all potential ignition sources to protect against the ignition of flammable material and explosion; and

(m) traffic management arrangements are in place.

31. In addition to the above, for safety and security reasons, a site security system is in place including perimeter fence around the site, CCTV, site lighting and access control. The Site is manned by gate security staff controlling access and maintaining a register of personnel on location for use in case of an emergency. Because of the hazards present on Site 1, all personnel entering the Site 1 for the purpose of work activities can only do so after completing extensive health and safety training. Such personnel are also required to wear full, approved, Personal Protective Equipment ("**PPE**") including, as a minimum, coveralls, a safety helmet, safety boots and safety glasses. The only exception to the requirement for PPE would be for the emergency services attending in an emergency situation.

32. Any unauthorised persons entering Site 1 for purposes other than conducting planned work activities would do so without receiving the essential training and PPE referred to above. As indicated above, they could therefore be exposed to a number of on-site hazards that have the potential to result in personal injury to themselves or others or in damage to the environment. If unauthorised personnel entered Site 1 at any time, it would therefore be necessary immediately to shut down operations for health and safety reasons.

33. Additional off-site health and safety risks are posed by hazards and/or obstructions along the road used for access to / egress from Site 1. Risks are presented by the movement of trucks to and from Site which are carrying hazardous substances. Given the nature of the site, access for emergency vehicles is required 24 hours a day.

34. As referred to above, Site 1 is interconnected with neighbouring terminals which are also Upper Tier COMAH establishments and in relation to which the risk / hazard profile is similar (see **UKOP1: pages 123 to 127** by way of example). The infrastructure, surface water drainage system and fire-fighting systems are common for Site 1 and its neighbouring sites.

SITE 2 (KINGSBURY): ACTIVITIES/HEALTH AND SAFETY CONCERNS

35. The primary activities undertaken on Site 2 are:

(a) transfer of fuel to neighbouring terminals from pipeline systems including the storage of pipeline interface material;

(b) transfer of fuel from the neighbouring terminal to the pipelines system for onward transportation; and

(c) acting as the central control centre for the monitoring and control of the UKOP and WLPSL pipeline and storage network.

36. Current onsite hazards on Site 2 include (but are not limited to) the following:

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(a) high pressure pipework, high pressure pumping systems, low pressure pipework and tankage for the handling and storage of hazardous substances including aviation kerosene, petrol and diesel fuel;

(b) high and medium voltage electricity;

(c) deep water; and

(d) moving heavy duty vehicles.

37. Whilst Site 2 is not a site which is subject to the COMAH Regulations, it does store petrol interface material and is linked to three COMAH sites within the same locality at Kingsbury Terminal, and all of which are Upper Tier establishments.

38. The pages exhibited at **UKOP1: pages 171-186** confirm the major accident hazards and scenarios at the three neighbouring COMAH sites and the control measures that are in place to address them. The hazards are similar to those that exist at Site 1 and include:

(a) Accidental release of dangerous substances;

(b) Explosion; and

(c) Fire.

39. Site 2 also houses the Central Control Centre which monitors and operates:

(a) the UKOP and WLPSL pipelines including the Buncefield storage site which is a COMAH site; and

(b) the national pipeline operations of UKOP and WLPS which are governed by the Pipelines Safety Regulations 1996 (the "**Pipeline Regulations**"). The Pipeline Regulations apply to all pipelines in the UK and their purpose is to ensure that pipelines are designed, constructed and operated safely in order to provide a means of securing pipeline integrity, thereby reducing risks to the public and to the environment.

40. Site 2 is surrounded by a perimeter fence and there is in place a site security system including CCTV, site lighting and access control. The central security centre for the monitoring of all UKOP and WLPSL sites is within Site 2.

41. The Land Adjoining Site 2 is owned by the Secretary of State for Defence (the "**MOD**") and comprises the Kingsbury Rifle Range which remains in active use. The range danger area consists mainly of Kingsbury Woods and access to these woods is restricted to times when the range is not in use. The full perimeter of the range danger area is signed to warn of danger. However, the MOD has no significant protection mechanisms or barriers in place against unauthorised third party access.

42. Site 2 has also experienced obstructive action by individuals carrying out direct action in the form summarised at paragraphs 45(a) to (e) below.

GROUPS CARRYING OUT DIRECT ACTION

43. Extinction Rebellion and Just Stop Oil are the two principal campaign groups that have directly targeted the Sites in the last week and from whom further direction action is anticipated. Extinction

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Rebellion, established in May 2018, are often referred to in the national press as 'XR' and are an international environmental movement. They claim to use non-violent civil disobedience to protest against "*mass extinction and minimise the risk of social collapse*" **UKOP2: pages 190-194.** Just Stop Oil are a youth led protest group and describe themselves as a "*coalition of groups working together to ensure the Government commits to halting new fossil fuel licensing and production*" and who protest through means of non-violent civil disobedience, with "*strikes, boycotts, mass protests and disruption*" **UKOP2: pages 195-197**. They first came to public attention when, as part of a series of protests, they disrupted high profile football matches (Liverpool vs Arsenal and Everton vs Newcastle), by gluing and chaining themselves to goalposts **UKOP: pages 198-201**. Both campaign groups are protesting to stop new fossil fuel funding, and end the use of fossil fuels (especially gas and oil) **UKOP2: pages 202-213**. Just Stop Oil call for the immediate halting of all future licensing and consents for the exploration, development and production of fossil fuels **UKOP2: pages 214-221**. Information relating to the respective campaign group's strategies is at **UKOP2: pages 195-197 and UKOP2: pages 222-230**.

DIRECT ACTION AT THE SITES

44. The very recent examples of direct action targeted at Site 1 and which activity appears to have been fronted by the campaign groups referred to above, includes the following:

(a) on 1 April 2022, Just Stop Oil activists climbed on top of an oil tanker at the entrance of Site 1, with other individuals sat on the road in front of the oil tanker. Site 1 was among one of ten oil facilities targeted by the individuals carrying out direct action (with Site 2 being another target as set out below). Police were first called to Site 1 just before 4.15am to reports that a number of people were blocking the entrance to the depot. Police were forced to close Green Lane as individuals had chained themselves to the top and bottom of the oil tanker at the entrance to the site and had let the tyres down. 27 people were arrested at the site as a result **UKOP2: pages 231-237**.

(b) on 3 April 2022, Site 1 was targeted again and individuals carrying out direct action were back on site at around 3:12am (see **UKOP 2: pages 232-239**). Around 33 individuals were at the site and blocking the entrance to the depot. It was reported to me by on site personnel that Just Stop Oil protestors had cut through a fence to access Oil Road on Site 1 at this time and had caused damage to the perimeter fencing surrounding Site 1 as well as climbing on oil tankers at Oil Road which forms part of Site 1. This was reported to the Police by on site personnel under the crime reference number 41/26357/22.

(c) on the same date (3 April 2022) a statement from Hertfordshire Police confirmed that alongside individuals blocking the entrance to Site 1, a number of other individuals had managed to gain access to the inside of the neighbouring BP terminal Green Lane was closed as a result and remained closed for some time. 14 people were arrested. A tweet from the Just Stop Oil Group read *"#JustStopOil supporters inside the massive Buncefield terminal. Govt wants to produce every barrel of North Seal oil & gas – destroy the climate, the economy and our lives. The govt needs to #getagrip, get out of bed with the oil industry*." **UKOP2: pages 238-242.** More than 30 individuals also camped outside the site overnight, one of which is reported as stating that "*this is an ongoing campaign so there is no end date to it…..direct action and civil disobedience is only going to ramp up until we see change in the right direction".* Some of those carrying out the direct action stood on fuel trucks with banners and refused to come down, while others sat outside the gates to prevent tankers from leaving **UKOP2: pages 243-252**. Direct action continued at Site 1 over the weekend **UKOP2: pages 253-254.**

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(d) on 4 April 2022, it was reported that 41 arrests had been made in connection with the direct action. A Just Stop Oil spokesperson said that there were 200 arrests between 1 and 4 April 2022 in total across the oil facilities targeted. Superintendent Jameson of Hertfordshire Police is reported as stating:

> *"Protestors securing themselves to fuel tankers and unlawfully accessing an extremely hazardous site not only puts the protestors themselves at severe risk, but also poses a substantial danger to countless other people – members of the public, site workers who are just trying to do their jobs, not to mention emergency service workers who are having to work in incredibly challenging circumstances to bring these situations to a safe conclusion* ***UKOP2: pages 255-256.***

45. Site 2 has also been subject to direct action in the form of:

(a) on 1 April 2022, members of Extinction Rebellion and Just Stop Oil blocked the main entrance to Site 2 preventing oil tankers from leaving the site. Individuals blocked the main entrance to the oil terminal by sitting in the road, holding banners stating "*Just Stop Oil*" and climbing on top of an oil tanker. Those carrying out direct action also let the air out of the tyres of an oil tanker (see **UKOP2: pages 257-272**);

(b) on 3 April 2022, it was reported that Warwickshire Police had made 54 arrests at Site 2 for offences including criminal damage, obstructing the highway and public order following two days of policing activity in relation to the direct action at Site 2 **UKOP2: pages 273-275**;

(c) on 3 April 2022, Warwickshire police confirmed that a police presence would remain on Site 2 to deal with the *'protest activity'* **UKOP2: pages 276-278**;

(d) 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 **UKOP2: pages 279-288**; and

(e) 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*" **UKOP2: pages 289-291**;

46. As referred to above, there have been related direct action at sites owned by other operators including:

(a) on 1 April 2022:

(i) Members of Just Stop Oil and Extinction Rebellion blocked 10 oil terminals across the UK, listing the locations on their website as: Inter Terminals UK, Grays, Essex; Navigator Terminals Thames, Grays Essex; Site 1, Hemel Hempstead, Hertfordshire; Esso Birmingham Fuel Terminal, Birmingham, West Midlands; Esso West London Terminal near Heathrow Airport, west London; BP's Hamble Oil Terminal, Southampton, Hampshire; ExxonMobil's Hythe Terminal, Southampton, Hampshire; Esso's Purfleet Fuels Terminal, Purfleet,

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Essex; Site 2, Warwickshire; and BP Oil Depot, Kingsbury, Warwickshire (see **UKOP2: pages 292 – 295).** It was reported that Extinction Rebellion spokesman Andy Smith had stated that the group had "*held*" three locations of strategic importance to the UK's energy network including Esso West, near Heathrow Airport, Esso Hythe, Southampton and BP Hamble also in Southampton (see **UKOP2: pages 296 - 302)**. Activities included:

(A) Members of Just Stop Oil closed down the Gray's Inter Terminals by boarding fuel haulage vehicles (see **UKOP2: pages 304 - 306)**;

(B) it was reported that approximately 10 individuals were using a pink boat to block the entrance and exit to the Esso terminal at Hythe (see **UKOP2: pages 307 - 309)**;

(C) it was reported that two ports in Southampton were targeted by individuals from Just Stop Oil, by blocking roads to both BP's Hamble Oil Terminal and ExxonMobil's Hythe Terminal (see **UKOP2: pages 310 - 312)**;

(D) at the Tyburn Esso facility on Wood Lane, up to 45 individuals blocked the entrance to the site and glued themselves to the ground, whilst other protestors glued their arms to each other. Two protestors also climbed on top of an oil tanker. A spokesperson for Just Stop Oil said that they would remain "*until they are physically removed"* (see **UKOP2: pages 313 - 332)**;

(E) ExxonMobil had to shut down operations at Hythe, Birmingham, Purfleet and West London terminals due to direct action (see **UKOP2: pages 333 - 337)**;

(F) at Navigator Oil Terminal in Thurrock more than 30 people climbed on top of tankers (see **UKOP2: pages 338 - 339)**;

(G) at Esso's Purfleet terminal in London Road, about 15 individuals could be seen obstructing access to and from the terminal by locking themselves to a tanker vehicle outside the entrance and others to gates at the side (see **UKOP2: pages 333 - 337)**; and

(ii) it was reported that Essex Police had made a number of arrests after members of Just Stop Oil blocked roads on 1 April 2022, in Thurrock, leading to disruptions at Navigator Fuel Distribution Centre and at a depot in London Road, Purfleet (see **UKOP2: pages 340 - 342)**;

(b) on 2 April 2022, the Guardian reported that despite over 100 arrests, individuals were continuing to block UK oil terminals by climbing onto tankers and gluing themselves to roads (see **UKOP2: pages 343 - 344).**

(c) on 4 April 2022, more than 30 member of Extinction Rebellion returned to the Esso West oil facility in West London near Heathrow Airport and blocked the entrance to the facility (see **UKOP2: pages 346 - 348)**. They used two bamboo structures to block the entrance and displayed two large banners stating "*Join Us – London 9th April*" and "*Stop Fossil Fuels Now*".

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(d) 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 (see **UKOP2: pages 357 - 358).**

(e) on 4 April 2022, Extinction Rebellion published an article on their website stating that they are "*here to stay*" at the Esso West oil facility and that they will "*continue to block oil facilities until the government agrees to stop all new fossil fuel investments immediately*" (see **UKOP2: pages 359 - 363).**

(f) on 5 April 2022, the Times reported that supporters of Just Stop Oil and Extinction Rebellion had dug a secret network of tunnels at the Navigator Oil terminal in Thurrock, Essex, and that those supporters had remained underground as part of the action despite going 60 hours with no food (see **UKOP2: pages 279 - 288)**; and

(g) on 6 April 2022, members of Just Stop Oil blocked West Thurrock Way, carried out direct action inside the underground tunnels, and occupied the Navigator Terminal (see **UKOP2: pages 364 - 366)**. On the same date Just Stop Oil claimed that around 25 individuals had broken into the Navigator terminal in Thurrock (see **UKOP2: pages 367 – 369)** and the Mail online reported that members of Just Stop Oil had climbed onto lorries and locked themselves to pipes (see **UKOP2: pages 370 - 376)**.

47. The reference to "*London-9th April*" in paragraph 46(c) above, is a reference to a series of planned direct actions by Extinction Rebellion which are scheduled to take place later this month. The group's website indicates that the direct action will begin on 9 April 2022 in Hyde Park and individuals at the recent site protests have held banners encouraging people to join the protests at Hyde Park to end fossil fuels. The website further encourages people to "*book time off work from April 9th-17th and be ready to continue in civil resistance in London on at least the first 3 weekends following the 17th*". The stated intention is to "*flood the city with people to grind the capital to a halt, causing maximum material disruption"* (see **UKOP2: pages 404 - 407)**.

48. Whilst the planned protests are focused on Hyde Park, given that the objective of the protests is to "*end fossil fuels*" and by reference to the statements made by protestors that there is no end to this campaign and that weeks of disruption are planned (see paragraphs 44(c) and 46(d) to (e) above), the Claimants believe that there remains a high risk of the Sites continuing to be targeted during this period.

49. The Claimants consider that the body of evidence referred to above (and in the supporting exhibits) demonstrates that the Sites have already been subject to intentional acts of trespass and interference by individuals who are opposed to the Claimants' commercial operations and will continue to be so disrupted.

PREVENTING UNLAWFUL ACTS OF TRESPASS AND ACTS OF INTERFERENCE

50. These acts of trespass indicate that the Sites remain exposed to a risk of acts of trespass and interference by those carrying out direct action, notwithstanding the extensive security and health and safety arrangements in place which I refer to above. Whilst the private access routes have not yet been directly impacted, given the acts of trespass, which have occurred at the Sites, as well as at other operators' sites (examples of which are set out at paragraphs 46(a) – (g) above) and the threats of further trespass / direct action, the Claimants consider that the private routes are at risk of interference and an injunction is necessary to deter individuals from entering or

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remaining on the Sites and / or interfering with the private access routes without the Claimants' consent.

51. As well as posing a danger to the trespassers themselves, any act of trespass also poses a serious risk of harm to the Claimants, their employees, agents, contractors and other visitors to the Sites, and to their property and commercial activities. Whilst all of the Sites are protected by security measures, regrettably these measures alone have not proved sufficient to deter would be trespassers, as evidenced at paragraphs 44 and 45 above.

52. The Claimants take no issue with the local grass root campaign groups, provided that such groups engage in lawful protest methods. The Claimants' sole concern is with unlawful activity. In this regard, the Claimants wish to stress that they are not seeking injunctive relief as a means to quell, suppress or circumvent any individual's lawful right to protest, being a right which the Claimants fully respect. This application is not made nor is it intended to prevent any individual's lawful right to demonstrate and protest. There is plainly a careful balancing exercise to undertake when considering the right to peaceful protest against the rights of others to continue their lawful operations without undue interruption. However, the Claimants consider that unlawful and criminal activity cannot be justified by reference to such a balancing exercise.

53. The existence of an injunction will provide the Claimants with a means both to enlist the assistance of the Court and the Police to take effective action and to remove trespassers at the earliest opportunity in the event of any act of trespass or interference. A key purpose of the injunction sought by the Claimants is therefore to stop unauthorised people coming onto the Sites, against a background of genuine concern for safety.

54. In relation to acts of trespass in particular, in contrast to the claim for injunctive relief against persons unknown, the CPR Part 55 summary possession procedure is only available once a site has been occupied unlawfully. CPR Part 55 therefore addresses, but cannot prevent, the presence of unlawful occupiers on a site, and the risks inherent within such occupation. As a result, recourse to CPR Part 55 is not an adequate substitute for the protection that an injunction can afford to the Claimants.

55. As compared to an injunction, recourse to the CPR Part 55 summary possession procedure (and interim procedure) involves considerable delay which increases and prolongs the risks to health and safety and property. The delay also, of course, as the protestors intend, frustrates the commercial activities of the site operators and those with economic interests in the site.

56. Absent an injunction, the Claimants fear that they will be forced to incur much irrecoverable cost in repeated court proceedings against different sets of persons unknown.

57. For the reasons set out above, and taking into account recent acts of trespass at the Sites and neighbouring sites, and the threats of future trespass, the Claimants' seek pre-emptive injunctive relief in the terms set out in the draft Order.

URGENT NATURE OF THE APPLICATION

58. The Claimants seek pre-emptive injunctive relief forbidding certain unlawful activities on the part of unidentified persons protesting against the Claimants' activities. Since 1 April 2022, the Claimants have been the target of, and subjected to, significant acts of direct action, in opposition to its operations and at its operational sites

59. The Claimants are responsible companies, which fully respect the rights of others to peacefully protest and did not seek injunctive action until protestor activity started to significantly impact on

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lawful operations and endanger people. The Claimants are concerned at the level of unlawful direct action that has already taken place, and/or is expected to take place at the Sites. The Claimant is also concerned that such increased direct action will hinder lawful operations and will endanger employees, contractors, the general public, public servants and the protestors themselves.

60. The numerous examples of unlawful direction action, including acts of trespass, demonstrate the real and imminent risk of unlawful acts occurring on and around the Sites absent the orders sought by way of the Application being made. As to the imminent nature of those risks, the evidence of direct action referred to in this statement suggests that there is a real risk that unlawful acts by individuals opposed to the Claimants' operations is likely to disrupt and interfere with the Claimants' use and occupation of the Sites.

61. At paragraphs 44 to 46 above, I have provided evidence of acts of unlawful direct action targeted at and suffered by the Claimants and by other operators. This body of evidence demonstrates that this direct action is becoming increasingly frequent, intimidating, and uncontrolled. The Claimants consider that these unlawful activities give rise to a significant likelihood of risk of harm and injury, in the form of harm and injury to:

    (a) the general public;

    (b) the Claimant(s); and

    (c) the Defendants themselves.

62. Against this background, and in line with the approach adopted by other industry operators, the Claimants consider that it is necessary and proportionate at this juncture to seek similar relief from the Court, not least given the strategic importance of the Sites to the UK as referred to in Mr Davis' statement, and the significant health and safety risks arising from the unlawful activities referred to in this statement.

BASIS OF APPLICATION: NOTICE

63. 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.

64. It is the intention of the Claimants to email the Extinction Rebellion and Just Stop Oil campaign groups at the email addresses specified above in order to inform them that:

    (a) proceedings have been issued;

    (b) to confirm the details of the hearing of the Application; and

    (c) to invite individuals who have trespassed at the Sites or intend to trespass at the Sites and / or interfere with the First Claimant's rights to use the private access routes adjoining the Sites to identify themselves.

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65. In the circumstances the Claimants will have taken all practicable steps to notify the Defendants. It is impractical to give the Defendants more notice because of the urgency in which this application had to be made.

66. The distinct purpose of the injunction is to pre-empt and to prevent unauthorised people from entering onto the Sites and/or unlawfully interfering with the lawful activities of the Claimants. There is a real risk that giving notice will prompt and mobilise the Defendants into occupying and targeting the sites earmarked for protection prior to a hearing date. Such risk is exacerbated by the speed in which occupation can take place and, in particular, the speed at which unlawful occupiers can engage with destructive activities to prevent access of such sites by their lawful proprietors. Should this occur, then the Claimants would be required to take steps to recover possession pursuant to CPR 55, which would not be an adequate substitute for the protection that an injunction would otherwise afford to the Claimants in such circumstances.

67. In any event, the Claimants have made full and frank disclosure of all material facts and issues, and have carried out proper enquiries to ensure that this duty is met.

PERSONS UNKNOWN

68. It has not been possible for the Claimants to identify any of the individuals involved in the direct action taking place at the Sites and, as referred to above, it is the intention of the Claimants (via their solicitors) to invite individuals who have trespassed at the Sites or intend to trespass at the Sites and / or interfere with the First Claimant's rights to use the private access routes adjoining the Sites to identify themselves

ALTERNATIVE METHODS OF SERVICE OF ORDER

69. A copy of the draft Order accompanies this Application. The proceedings are not brought against named defendants, and therefore the usual methods of service prescribed under Part 6 of the CPR are not applicable. As it will not be possible to serve the Claim Form and other Court documents by standard methods of service, the Claimants propose alternative methods of service of the Court documents and evidence in these proceedings pursuant to CPR 6.15, 6.27 and 81.4(2)(c) and (d).

70. The following methods of service are proposed in relation to each of the injunctions sought and as particularised in paragraph 12 to the draft order to this Application.

71. In seeking an Order for alternative service, the Claimants must demonstrate that the steps for alternative service are such that the claim will be expected to come to the attention of the potentially interested parties and prospective defendants to the proceedings. In addition, given that the Defendants to these proceedings may contend that the relief the Claimants are seeking affects (or might affect) their exercise of their rights to freedom of expression (i.e. their article 10 rights under the European Convention on Human Rights), the Court will wish to ensure (before granting relief) that the Claimants have taken all practical steps to notify the Defendants or that there are compelling reasons why the Defendants should not be notified (section 12(2) of the Human Rights Act 1998 applied).

72. By reference to each of the proposed methods of service set out below, the Claimants consider that the claim will come to the attention of the potentially interested parties and prospective defendants in these proceedings, and that the Claimants will have taken all practical steps to notify those parties of the claim.

Alternative methods of service

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73. The Claimants propose that service of the Order, and the documents comprising the Claim Form, the Particulars of Claim, the Response Pack, the Application Notice dated 7 April 2022, the evidence relied upon by the Claimants, 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 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: [email address] via, and may be viewed at, the web link referred to in paragraph 12(b) of the Order;

(b) Posting the Order and the Court Documents at the following web link: [link]; and,

(c) Fixing warning notices in the form set out in Schedules 6 and 7 (together, "**the Notices**") as follows:

(i) In respect of **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 **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 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 12 of the draft order:

(i) xr-legal@riseup.net;

(ii) juststopoil@protonmail.co.uk

Good and sufficient service

74. By taking the above steps, the Claimants consider that the Notices will come to the attention of potentially interested parties and prospective defendants and that, therefore, the steps proposed in respect of service as set out above will draw these proceedings to the attention of all interested parties and prospective defendants, and which substituted service will amount to giving "*all practical steps*" that can or should be taken in this case in respect of notifying the potential respondents to the proceedings.

75. The Claimants respectfully suggest that the proposed methods of alternative service which are set out in detail in the draft Order accompanying this application are likely to ensure that the proceedings and the Court documents will come to the attention of those who are likely to be affected by the making of the injunction order, or interested in the making of the Order, and also represent all of the practical steps that the Claimants could be expected to take in respect of such service for the purposes of section 12 of the Human Rights Act 1998.

DAMAGES

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76. Damages would not be an adequate remedy and that is why an injunction is being sought. This is because of the very serious consequences that could occur if the direct action persists as referred to above. In addition, I do not believe that the Defendants would be in a financial position to pay any damages awarded to the Claimants.

77. In the event that the draft Order sought is granted, UKOP has confirmed that it shall provide a cross undertaking in damages to the Defendants to the effect that, if the Court later finds that the order has caused loss to the Defendants, and decides that the Defendants should be compensated for that loss, UKOP will comply with any order the Court may make.

THE ORDER

78. For the reasons set out in this statement and having regard to the undertakings given by the Claimants at Schedule 3 to the draft Order attached to the Claimants' application notice, I respectfully request that this Honourable Court grants the draft Order as sought.

CONCLUSIONS

79. As indicated in the preceding paragraphs, substantial direct action (in the form of trespass) has already occurred in respect of Site 1 and I believe will continue to occur and there is a real risk of imminent trespass and/or unlawful direction action in relation to each of the Sites. The Claimants are making this Application in order to restrain the current unlawful activity and in an effort to minimise the risk of a future trespass and/or unlawful protester activity occurring on or around the Sites. The Claimants also wish to ensure that, should a future incident of unlawful protestor activity occur, they are able to move quickly in enforcing any order made by the Court, thereby reducing the detrimental impact on the Claimants' commercial operations and/or any risk of damage to property and/or injury to persons.

80. The Claimants have made every effort to ensure that the orders requested are necessary and proportionate. I believe the orders proposed represent the minimum orders required to adequately protect the Claimants' interests and to prevent unlawful direct action at, or in the vicinity of, the Sites.

The Claimants do not make this Application for injunctive relief lightly. They are concerned by the clear risk of serious injury or harm to the Claimants, the Claimants' property, the wider public and to those carrying out the direct action themselves, as well of course as the obvious harm to the lawful business of the Claimants, posed by the unlawful activities which the injunction is aimed to prevent. I reiterate that the Claimants do not seek to quell lawful protest; their motivation is to protect their operations and the Sites from unlawful activity.

81. For the reasons set out in this witness statement, I respectfully request that this Honourable Court grant the Order as sought.

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: ……John Armstrong……..…… Dated: 7th April 2022 ……..……..

7FAFE9820F7D47D...

John Michael Armstrong

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 proceeding, 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

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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

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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:

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(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 though 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)

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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**).

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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.

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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: DocuSigned by: John Armstrong 7FAFE9820F7D47D... Dated: 14 April 2022

John Michael Armstrong

Party: Claimant
Witness: Daniel Owen Christopher Talfan Davies
Exhibit: UKOP4
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
PROPERTY TRUSTS AND PROBATE LIST

(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

DocuSign Envelope ID: 95ECDB87-8D1E-4F91-A13B-9D1358C8C321

Party: Claimant
Witness: Peter Malcolm Davis
Number: Second
Exhibit: UKOP7
Dated: 5 April 2023

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 / 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

SECOND WITNESS STATEMENT OF

PETER MALCOLM DAVIS

DocuSign Envelope ID: 95ECDB87-8D1E-4F91-A13B-9D1358C8C321

I, Peter Malcolm Davis, of 5-7 Alexandra Road, Hemel Hempstead, Hertfordshire will say as follows:

1. I currently act as a Consultant on behalf of British Pipeline Agency Limited ("**BPA**") and have held this role since September 2021. I have worked for BPA for over thirty-five years and prior to becoming a consultant, I was a Director and General Manager of BPA.

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. BPA acts as agent for the First Claimant United Kingdom Oil Pipelines Limited ("**UKOP**") and the Second Claimant West London Pipeline and Storage Limited ("**WLPSL**"), and it operates and maintains their UK based assets.

4. I am duly authorised to make this witness statement on behalf of the Claimants.

5. 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.

6. Produced and shown to me is a bundle of documents containing exhibit "**UKOP7**". Unless otherwise stated, page references in this witness statement refer to pages in that exhibit.

7. In this statement I adopt the definitions set out in my first witness statement dated 7 April 2022 (the **"First Witness Statement"**).

CURRENT POSITION

8. I make this statement in support of the Claimants' application for an order for pre-emptive injunctive relief in the terms set out in the draft Order.

9. The purpose of this second witness statement, which supplements my First Witness Statement, is to provide to the Court with an update in respect of the Sites following the grant of an interim order for pre-emptive injunctive relief in these proceedings made by Mr Peter Knox KC acting as a Deputy High Court Judge in the Chancery Division following a hearing on 20 April 2022 (the "**Order**"). Whilst this second witness statement provides an update on these matters, which were addressed in my First Witness Statement, I otherwise confirm that the content of my first statement remains true and accurate.

UPDATE ON SITE 1

10. At paragraph 41 of my First Witness Statement, I stated that:

> *"The main entrance providing access to and egress from Site 1 is to the right of Oil Road at the bottom right of the Site 1 Plan which leads right onto Green Lane and then on to the M1. The main entrance is gated. These gates are set back from the visibility splay and need to be permanently open when the terminal is operational to allow for free flow of access and egress. There is a further entrance to Site 1 to the left of Oil Road at the bottom left of the Site 1 Plan which leads onto Buncefield Lane. This entrance is gated and the gates are permanently closed. There are various smaller site maintenance and emergency access routes off Cherry Tree Lane (also known as Three Cherry Trees Lane)."*

11. The main entrance providing access to and egress from Site 1 continues to be to the right of Oil Road at the bottom right of the Site 1 Plan which leads right onto Green Lane and then on to the

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M1. However, the gates, which I refer to as being set back from the visibility splay, are going to shortly be relocated by BPA and will be repositioned at the edge of the visibility splay itself. It is anticipated that the works to relocate the gates will commence in the week of 17 April 2023 and will take up to two weeks to complete. I refer to the plan at UKOP7 page 2 indicating the current location of the gates, and where it is proposed that they will be positioned. The gates remain, and will remain once repositioned, permanently open when the terminal is operational to allow for free flow of access and egress. There has been no change to the remaining entrances or access arrangements to Site 1 which I refer to at paragraph 41 of my First Witness Statement.

UPDATE ON SITE 2

12. There is no update in relation to Site 2 and my evidence in respect of the Claimants' respective ownership, possession, control and rights in relation to Site 2 remains as per my First Witness Statement.

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: DocuSigned by: P M Davis 3C9737B4C1C3477... Dated: 05/04/2023

Peter Malcolm Davis

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Party: Claimant
Witness: John Michael Armstrong
Number: Third
Exhibit: UKOP6
Dated: 5 April 2023

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 / 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

THIRD WITNESS STATEMENT OF

JOHN MICHAEL ARMSTRONG

DocuSign Envelope ID: CD5D24AB-ACAE-4179-85FC-1BE68C9ADEAB

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. BPA acts as agent for the First Claimant United Kingdom Oil Pipelines Limited ("**UKOP**") and the Second Claimant West London Pipeline and Storage Limited ("**WLPSL**"), and it operates and maintains their UK based assets.

4. I am duly authorised to make this witness statement on behalf of the Claimants.

5. 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.

6. Produced and shown to me is a bundle of documents containing exhibit "**UKOP6**". Unless otherwise stated, page references in this witness statement refer to pages in that exhibit.

7. In this statement I adopt the definitions set out in my first witness statement dated 7 April 2022.

CURRENT POSITION

8. I make this statement in support of the Claimants' application for an order for pre-emptive injunctive relief in the terms set out in the draft Order.

9. The purpose of this third witness statement, which supplements my first and second witness statements dated 7 April 2022 and 14 April 2022 respectively, is to provide to the Court with 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 KC acting as a Deputy High Court Judge in the Chancery Division following a hearing on 20 April 2022 (the "**Order**") and therefore addresses:

   (a) evidence of direct action which has occurred 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 targeted at other organisations affiliated with the oil and gas sector which has occurred since the date of the Order.

DIRECT ACTION IN THE VICINITY OF SITE 1 AND SITE 2

10. In my first and second witness statements dated 7 April 2022 and 14 April 2022, I addressed in detail the direct action suffered by the Claimants in respect of Site 1 and the direct action targeted at the operations of the Claimants in close proximity to Site 1 and Site 2. This 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 of the Order.

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11. Since the date of the Order, there have been further incidents of direct action in close proximity to Site 2.

12. I set out below examples of direct action that have occurred since the Order was made, and for which evidence has been obtained from three principal sources, namely:

    (a) 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 materials which have been published on their respective websites; and

    (c) various newspaper articles which have appeared in the national press.

13. On 23 April 2022, a tunnel was discovered by police which had been dug under the road in the Trinity Road area next to the Kingsbury Oil Terminal. Police were forced to keep the road closed whilst the damage caused was assessed as it was reported that it may pose a risk for drivers. Warwickshire police reported that they had arrested seven people, including for criminal damage, in connection with the incident. On 25 April 2022, it was reported that two additional individuals who entered the Kingsbury Oil Terminal had also been arrested on suspicion of aggravated trespass and criminal damage **UKOP6: pages 7-15**.

14. From 26 April 2022 to 28 April 2022, Just Stop Oil supporters protested outside the Kingsbury Oil Terminal. It was reported that Police warned protesters that they were breaching the Valero Order. However, protests persisted with people holding placards saying *"oil is stealing my future"*; *"don't stop us – stop oil"; "we are breaking the injunction";* and *"dangerous criminals."* Protests continued for three days in spite of police warnings and, in total, 34 protesters were arrested **UKOP6: pages 16-31.**

15. On 4 May 2022, it was reported that 11 Just Stop Oil members were protesting outside Kingsbury Oil Terminal. Eight of the protesters attending were, it was reported, at the same time supposed to attend a full committal hearing at the Birmingham County Court for previous breaches of the NWBC Order but chose not to attend court, instead committing another breach of the injunction **UKOP6: pages 32-33.**

16. On 15 May 2022, it was reported that two Extinction Rebellion supporters were being held on remand after breaching the NWBC Order at Kingsbury Oil Terminal. A tweet of the same date by Extinction Rebellion Birmingham stated that *"2 Birmingham rebels are currently being held on remand until next Thursday for breaking an injunction and staging a peaceful protest at Kingsbury Oil Depot."* Birmingham Live reported that protesters repeatedly said they see Kingsbury as a "*legitimate target*" **UKOP6: pages 34-37.**

17. On 22 August 2022, it was reported that police had blocked off Trinity Road, being one of the main roads leading into Kingsbury Oil Terminal, as Just Stop Oil protesters had reportedly been digging under the road. This prevented traffic from passing through as the road was considered unsafe for use and police officers had to turn traffic away for almost an hour **UKOP6: pages 38-39.**

18. On 24 August 2022, Fuel Oil News reported that around 50 protesters had staged demonstrations at Kingsbury, Grays and Thurrock Oil Terminals resulting in more than 20 arrests. About 30 individuals targeted Grays and Thurrock, blocking a road leading to the Navigator oil terminal, with others occupying tunnels dug beneath terminal access roads. At Grays, a small group of protesters trespassed onto the site in the early hours, climbed up into the loading bays and then on up into pipework, where they attached themselves with glue. A specialist heights team were deployed by the police to remove them. It was reported that there were about 20 people blocking access roads

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to Kingsbury Oil Terminal with others occupying two tunnels near the Terminal. Just Stop Oil claimed that the tunnels resulted in *a "total block of access"* to Kingsbury Oil Terminal. Fuel Oil News, in the same news report, reported that the government estimated that Just Stop Oil's protests had cost police £5.9 million so far in 2022 **UKOP6: pages 40-41.**

19. On 14 September 2022, Just Stop Oil supporters gathered with banners to block access to Kingsbury Oil Terminal by sitting in front of the main entrance. Protesters remained at the site for over five hours. It was reported that 51 protesters were arrested by Warwickshire Police following the incident for breaching the NWBC Order. In the BBC's report on the incident, a nearby local business owner, who operated a firm that ran fuel tankers in and out of the base, was quoted, stating that activists had previously *"drilled the sidewalls of 364 tyres"* on trucks, vans and cars at the terminal, a nearby truck works and another neighbouring deport with damages estimated at £184,000 **UKOP6: pages 42-47.**

20. Notwithstanding the significant direct action listed above, I believe that such direct action has reduced since April 2022 due to the following factors:

    (a) the service of the Order at the Sites and by email to the campaign groups Extinction Rebellion and Just Stop Oil;

    (b) the deterioration in the weather during the winter months;

    (c) the existence of an injunction order made by Mr Justice Bennathan in the King's Bench Division dated 12 April 2022 in favour of Valero Energy Limited, Valero Logistics UK Limited and Valero Pembrokeshire Oil Terminal Limited (together, "**Valero**") and which protects a number of Valero's sites including land interests at Kingsbury Oil Terminal (of which Site 2 forms part) (the "**Valero Order**"). A copy of the Valero Order can be found at **UKOP6: pages 48-84.** A continuation of the injunction afforded by the Valero Order was granted by order of Mr Justice Soole on 20 January 2023, a copy of which can be found at **UKOP6: pages 85-124;** and

    (d) the existence of an injunction order made by Mr Justice Sweeting in the King's Bench Division dated 9 May 2022 in favour of the North Warwickshire Borough Council and which protects the locality of the Kingsbury Oil Terminal (of which Site 2 forms part) by placing restraints on the organisation of, or participation in, any protest against the production or use of fossil fuels at Kingsbury Oil Terminal (the "**NWBC Order**"). In particular, the NWBC Order gives a power of arrest outside the Kingsbury Oil Terminal and at the junctions of the roads leading into it. A copy of the NWBC Order can be found at **UKOP6: pages 125-131.** The NWBC Order remains in force as at the date of this witness statement. However, an application has been made to set aside the NWBC Order, which application I refer to at paragraph 56 below.

21. If any of these factors were to be removed, I believe that the direct action would escalate.

22. For example, whilst the Order has not prevented direct action entirely in the vicinity of the Sites, it appears to have provided a deterrent effect and, as such, continues to assist the Claimants in ensuring that they can conduct their operations at the Sites without risk of the significant practical, financial and logistical implications for the Claimants, many other third parties and potentially the UK economy, which would otherwise arise from direct action, not to mention the substantial health and safety risks that I refer to in paragraphs 20 to 42 of my first witness statement.

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EVIDENCE OF DIRECT ACTION TARGETED AT OTHER OPERATORS AND AFFILIATED ORGANISATIONS FROM DATE OF ORDER TO 5 APRIL 2023

23. Since the date of the Order, there continues to be related direct action at oil terminals and infrastructure sites owned by other operators. There has also been an escalation of activity targeted at industries and organisations that members of Extinction Rebellion and / or Just Stop Oil consider to be affiliated to the fossil fuel industry as well as key transport hubs.

24. On 3 May 2022, protestors from the Just Stop Oil group entered and remained at the Nustar Clydebank facility in Scotland for 60 hours, in a bid to halt operations. Protestors climbed on top of tankers, locked themselves to the entrance and sat on pipes and silos. 31 people were arrested and charged in connection with the protests, 15 of which were charged for breach of the peace and 16 for trespass **UKOP6: pages 132-134.**

25. On 3 July 2022, Just Stop Oil reported that its supporters had disrupted the British Grand Prix at Silverstone by invading the track and sitting down. The protestors needed to be removed by track officials and police and ITV news reported that six people were charged over the track invasion with conspiracy to cause public nuisance **UKOP6: pages 135-138** and were found guilty after a trial on 10 February 2023 **UKOP6: pages 139-141**. It was reported that the jury found that the protesters were guilty of risking "*serious harm*" to Formula 1 drivers and it was also reported that footage released after the trial showed how close the cars had been to the protesters **UKOP6: pages 142-144.**

26. On 19 July 2022, the News UK headquarters at London Bridge had their windows smashed by Extinction Rebellion protestors over their coverage of the UK heatwave. Protesters destroyed glass panels and hung posters next to entrances for journalists at the Sun and the Times reading *"tell the truth"* and *"40 degrees = death"* **UKOP6: pages 145-146.**

27. On 20 July 2022, Just Stop Oil protestors climbed on the gantries in three separate locations on the M25 between junctions 10 and 30, causing significant disruption and the temporary closure of the M25 **UKOP6: pages 147-149.**

28. On 23 August 2022, around 30 Just Stop Oil protesters were involved with a number of direct actions in Essex including:

    (a) establishing a roadblock on St Clements Way near Chafford Hundred railway station with five protesters also occupying tunnels underneath the road. Protesters aimed to block a *"key tanker route"* as part of their protests;

    (b) occupying the Grays oil terminal in Thurrock, with protesters blocking an access road leading to the terminal; and

    (c) protestors at height at an industrial site at Askew Farm Lane.

    Just Stop Oil were protesting the government's plans to allow additional oil and gas projects in the UK. Essex Police reported that they had arrested 23 people for various offences, while asking people to avoid the area. Police were also having to divert traffic to keep everyone safe and issued the following statement: *"policing is not anti-protest, but we must intervene where there is a risk to life or where laws are being broken"* **UKOP6: pages 150-154.**

29. On 28 August 2022, supporters of Just Stop Oil blocked an oil tanker on a key route to and from the Navigator terminal in Essex. The group claimed they were aiming to block St Clements Way, Grays, as a key delivery route from the terminal. Nearly 10 people stopped a tanker, one protester

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climbed on top of the tanker while others deflated the tyres. Essex Police arrested eight people as a result of the protests **UKOP6: pages 155-157.**

30. On 4 September 2022, BBC News reported that Just Stop Oil protesters had left a tunnel under St Clements Way in Grays after 13 days protesting what they consider is government inaction over climate change. The police issued the following statement regarding the protest activity: *"over the course of the last fortnight we have made more than 60 arrests and worked hard with our partners to keep disruption to our local community and business to a minimum and keep Essex moving… This work has required a huge amount of resources and has diverted officers from other duties such as the prevention and investigation of burglary, robbery, sexual and violent crime"* **UKOP6: pages 158-159.**

31. Just Stop Oil staged 32 days of disruption from the end of September and throughout October 2022, which, according to the Metropolitan Police, resulted in 677 arrests and 111 protestors charged. Officers were also forced to work 9438 extra shifts to tackle the disruption. The aim of the disruption was reported as being to force the government to halt all oil and gas licences **UKOP6: pages 160-162**. Actions included the following:

    (a) on 1 October 2022, supporters of Just Stop Oil blocked Waterloo, Westminster, Lambeth and Vauxhall bridges in sit-down protests **UKOP6: pages 163-166**;

    (b) on 7 October 2022, in what was reported as being in response to the government opening up a new licensing round to allow oil and gas companies to explore for fossil fuels in the North Sea, Just Stop Oil campaigners blocked roads leading to Vauxhall Bridge. This followed six days of disruption to central London roads. Protestors vowed to *"occupy Westminster"* with daily roadblocks until there is a moratorium on new oil and gas projects **UKOP6: pages 167-168**;

    (c) on 14 October 2022, Just Stop Oil protestors threw tomato soup on Vincent van Gogh's Sunflowers painting at the National Gallery in London and then glued themselves to the wall underneath the artwork (**UKOP6: pages 169-171**) and on the same day spray-painted New Scotland Yard and blocked traffic on the road outside (**UKOP6: pages 172-177**);

    (d) on 16 October 2022, the Telegraph reported that Just Stop Oil members had sprayed orange paint over an Aston Martin showroom in central London and had sat in Park Lane in central London, some gluing themselves to the tarmac or locking themselves together **UKOP6: pages 178-179**;

    (e) on 17 October 2022, two Just Stop Oil supporters climbed the Queen Elizabeth II suspension bridge at the Dartford Crossing and unfurled a banner, forcing the police to stop traffic from entering the bridge **UKOP6: pages 180-182**;

    (f) on 18 October 2022, two Just Stop Oil protestors disrupted oil supplies to Kent and the South East for 36 hours by blocking the Dartford Crossing and climbing up the Queen Elizabeth II Bridge which resulted in the closure of the bridge and major traffic delays **UKOP6: pages 183-190**;

    (g) on 20 October 2022, Just Stop Oil supporters sprayed orange paint on the outside of the Harrods building and disrupted traffic in Knightsbridge by sitting on and gluing themselves to the road carrying banners. Just Stop Oil stated "*This is not a one day event, expect us every day and anywhere. This is an act of resistance against a criminal government and their genocidal death project. Our supporters will be returning – today, tomorrow and the*

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next day – and the next day after that – and every day until our demand is met: no new oil and gas in the UK" **UKOP6: pages 191-193**;

(h) on 24 October 2022, two Just Stop Oil protestors defaced the waxwork model of King Charles III in Madame Tussauds **UKOP6: pages 194-196**; and

(i) on 26 October 2022, Just Stop Oil activists sprayed paint over the Ferrari and Bentley showrooms in central London **UKOP6: pages 197-199**.

32. On 31 October 2022, it was reported that Just Stop Oil activists had targeted News UK's headquarters as well as buildings used by MI5, the Home Office and the Bank of England by spraying them with orange paint. It was reported that the group said the buildings were chosen as they represented *"the four pillars that support and maintain the power of the fossil fuel economy"* **UKOP6: pages 200-202**. The Metropolitan Police reported six arrests for criminal damage on the day **UKOP6: pages 203-205**. Following these actions, it was reported that the total number of arrests of Just Stop Oil protestors made in October 2022 came to nearly 650 **UKOP2: pages 206-210** and since April 2022 to around 1900 **UKOP6: pages 211-216**.

33. On 1 November 2022, members of Just Stop Oil glued themselves to the road outside Downing Street to prevent access, whilst others tried to climb the gates to Downing Street **UKOP6: pages 218-221.**

34. On 7 November 2022, members of Just Stop Oil shut down parts of the M25 for four days by climbing gantries above the motorway in at least six different locations. The Metropolitan Police said it had arrested 63 suspects in a *"major operation to tackle serious disruption"* and Sky and ITV news reported that 58 people had been charged. It was reported that whilst a rolling roadblock was being implemented to help ease existing traffic, two lorries collided and a police officer was knocked off his bike and injured **UKOP6: pages 221-238**.

35. On 14 November 2022, Extinction Rebellion members targeted over 100 Barclays bank branches in England, Scotland, Wales and Northern Ireland. Protestors smashed windows, threw fake oil and red paint over buildings, locked themselves to buildings, leafletted and held 'die-ins' and street theatre **UKOP6: pages 239-245**. Multiple media outlets reported a number of arrests across different cities including London, Birmingham, Glasgow, Cardiff and Belfast amongst others **UKOP6: pages 246-253**.

36. On 21 November 2022, Extinction Rebellion supporters targeted a number of offices in central London as part of a co-ordinated direct action. Black paint and fake oil were thrown over buildings, protestors glued themselves to windows, a fire was lit and fake blood poured on the pavement outside businesses. It was reported that the offices were targeted because they were believed to have links to the fossil fuel industry. The Metropolitan Police reported that 15 protesters were arrested on suspicion of criminal damage or conspiracy to commit criminal damage. The offices targeted included: (**UKOP6: pages 254-259**)

(a) INEOS;

(b) Schlumberger;

(c) BP;

(d) Eversheds Sutherland;

(e) JP Morgan;

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(f) The International Maritime Organisation;

(g) The Institute of Economic Affairs;

(h) Department for (BEIS); and

(i) Ontario Teachers Pension Plan.

37. On 18 January 2023, Extinction Rebellion activists threw black paint outside the Home Office, reportedly in protest of the Government's decision to approve a new coal mine in Cumbria. Protesters poured the black paint, which resembled crude oil, out of plastic buckets marked *"End Coal",* while two of the activists attached themselves together with a large tube. Two demonstrators also set off flares and others held signs reading "*cut the ties to fossil fuels*." The Metropolitan Police were called to the Home Office to disperse the group where they arrested two men on suspicion of causing criminal damage **UKOP6: pages 260-261**.

38. On 14 February 2023, Extinction Rebellion activists blockaded entrances to Luton Airport's private jet terminals in a Valentine's Day protest dubbed "*love in action.*" This was part of a co-ordinated action by activists in 11 countries targeting sites across Europe, Australia, New Zealand and the US. Protesters locked themselves to metal barrels and blockaded entrances to the airport's Harrods Aviation and Signature private jet terminal carrying large signs. They also parked a boat in front of the gates to the private terminal, with some activists attaching themselves to it **UKOP6: pages 262-266.** On the same day Just Stop Oil supporters delivered an ultimatum to the Prime Minister, warning that if the government does not halt licencing any new fossil fuels by 10 April it would face escalating disruption **UKOP6: page 267**.

39. On 17 February 2023, Extinction Rebellion protesters occupied two buildings at the University of Cambridge. Protesters climbed up to a balcony on the Department of Engineering building attaching a banner with the message "*University of Cambridge: Funded by fossil fuels*" while letting off smoke flares. Other protesters also staged a demonstration in the foyer of the Department of Chemical Engineering, holding dinosaur banners and drawing pictures **UKOP6: pages 268-270.**

40. On 20 February 2023, Extinction Rebellion protesters targeted London Fashion Week. 30 protesters attended 180 the Strand where the fashion show sponsored by Coca-Cola was being staged and poured black paint on the red carpet while setting off smoke bombs. Protesters held banners outside the event which read: "*cut the ties to fossil fuels*" and "*Coca-Cola: World's top plastic polluter*." This action came as part of Extinction Rebellion's 'Cut the Ties to Fossil Fuels' campaign which will see a major protest staged in Westminster on April 21 **UKOP6: pages 271-274.**

41. On 2 March 2023, Extinction Rebellion protestors threw pink paint over the UK Finance building and plastered a large sticker reading "*corrupt*" on the window of the building to highlight how the financial system "*prioritises profit over people and the planet*" **UKOP6: pages 275-278.**

42. On 18 March 2023, Just Stop Oil protesters blocked traffic in Bristol as part of a demonstration to "*demand that ministers stop investing in fossil fuel extraction*" **UKOP6: pages 279-283.**

43. On 22 March 2023, Extinction Rebellion protestors, armed with fire extinguishers, spray-painted the offices of the Sun, Daily Mail and Telegraph in London. They said the protests were about "*suppression of truth on the climate crisis*" **UKOP6: pages 284-285.**

44. On 25 March 2023, Just Stop Oil staged a march in Leeds demanding *"an end to fossil fuel lending by banks"* and covered a Barclays bank with orange paint in the city centre, **UKOP6: pages 286-287.**

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STATEMENTS FROM EXTINCTION REBELLION AND JUST STOP OIL

45. On 1 January 2023, Extinction Rebellion published a statement indicating that they would *"temporarily shift away from public disruption as a primary tactic"* and instead would *"disrupt the abuse of power and imbalance"* by prioritising *"attendance over arrest and relationships over roadblocks"* **UKOP6: pages 288-291.**

46. The statement is suggestive of a shift in strategy and tactics of the group. However, subsequent actions taken by the group, as referred to at paragraphs 37 to 41 and 43 above, indicate that Extinction Rebellion is continuing to target companies and organisations which are affiliated to the oil and gas industry with unlawful direct action. In any event, even if accurate, the statement only refers to a *temporary* shift away from public disruption, meaning that it may resume at any stage.

47. In relation to Just Stop Oil, according to their website, its requirements are "*that the UK government makes a statement that it will immediately halt all future licensing and consents for the exploration, development and production of fossil fuels in the UK*", and its methods for achieving this include 'civil resistance' and disruption until that demand has been met. Just Stop Oil stated that if that demand was not met by 14 March 2022 that it would "*take part in Non-Violent Direct Action targeting the UK's oil and gas infrastructure"* and on 3 October 2022, Just Stop Oil declared that they would continue with their campaign of non-violent civil resistance until the government commits to end new oil and gas, stating "…*This is not a one-day event, this is an act of resistance against a criminal government and their genocidal death project. Our supporters will be returning – today – tomorrow- and the next day – and the next day after that – and every day until our demand is met – no new oil and gas in the UK*…" **UKOP6: pages 292-295**.

48. On 28 October 2022 Just Stop Oil tweeted "*sign up for arrestable direct action at [link]".* On 1 November 2022 they tweeted "*we will escalate our legal disruption against this treasonous Govt*". On 11 November 2022 they tweeted "*you know that we won't stop*" **UKOP6: page 296**.

49. A Just Stop Oil press release of 7 December 2022 states that "*Six weeks of continuous disruption and civil resistance by supporters of Just Stop Oil during October and November resulted in over 700 arrests. Since the campaign began on April 1st, Just Stop Oil supporters have been arrested over 2,000 times, with 25 supporters currently in prison"* **UKOP6: pages 297-299.** Similar press releases can be found at **UKOP6: pages 300-314.** These are not protests that relate to the Claimants' Sites, but together with the examples set out at paragraphs 23-44 above, are strong evidence of the continuance of Just Stop Oil's campaign of civil resistance and disruption.

50. Furthermore, in response to the statement by Extinction Rebellion on 1 January 2023, in a statement given to the Guardian newspaper and published online on 2 January 2023, a Just Stop Oil member stated: "*It's 2023 and XR has quit… But it's 2023, and we are barrelling down the highway to the loss of ordered civil society, as extreme weather impacts tens of millions, as our country becomes unrecognisable … there is now a need to face reality…. We must move from disobedience into civil resistance…*" **UKOP6: pages 315-316.**

51. Just Stop Oil's website continues to state that "…*we will not be intimidated by changes to the law, we will not be stopped by private injunctions sought to silence peaceful people. Our supporters understand that these are irrelevant when set against mass starvation, slaughter, the loss of our rights, freedoms and communities*" **UKOP6: pages 317-319.** Prominent on the website is the statement that "*what we do over the next 3 to 4 years, I believe is going to determine the future of*

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humanity", suggesting that their campaign will be sustained for at least this period **UKOP6: page 292**.

52. The materials that have been published on Just Stop Oil's website as well as the group's social media channels would indicate that oil and gas companies remain the target of their campaign, and there therefore remains a risk to the Claimants' sites which the order in the terms sought would protect against. Furthermore, whilst Extinction Rebellion's most recent activities would suggest that there hasn't been the scaling back of unlawful direct action which their statement of 1 January 2023 would appear to suggest, in any event, there is a well documented overlap in the memberships of both groups (**UKOP6: pages 320-336 and 341-348**). As such, it cannot be discounted that members of Extinction Rebellion will participate in Just Stop Oil's campaign of civil resistance.

SUMMARY/ FURTHER RISK OF DIRECT ACTION

53. Since the events mentioned in my previous witness statement there has been frequent and significant direct action undertaken by Just Stop Oil and Extinction Rebellion, the scale of which appears to be escalating and in relation to which, given the nature of the campaigns, there is no discernible end date.

54. Both campaign groups are well supported and continue to mobilise their supporters. For example, on 11 January 2023, Extinction Rebellion launched their '100 Days' campaign which they called "*the biggest mobilisation campaign XR has ever undertaken*." Extinction Rebellion supporters dropped a banner from Westminster Bridge to launch the campaign, marking the 100 day countdown to "*The Big One*" on 21 April 2023 where the group will bring 100,000 people to Westminster **UKOP6: pages 337-340**. The ticker count for the event on Extinction Rebellion's home page as at 5 April 2023 showed around 23,500 people to be attending **UKOP6: page 349.**

55. Given the importance of the Sites covered by the current Order, Just Stop Oil's stated commitment to continuing its campaign and the highly disruptive and inherently dangerous effect of Just Stop Oil and Extinction Rebellion's protests, I therefore 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 on the Sites 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.

56. The fact that the number of incidents in the vicinity of the Claimants' Sites has decreased in number and regularity, particularly in comparison to the severity of the activity in April 2022, is a consequence of a number of factors which I refer to at paragraph 20 above, including the Order acting as an immediate deterrent, along with other High Court orders such as the NWBC Order. However, on 15 March 2023, North Warwickshire Borough Council issued a statement indicating that a person claiming to be connected to Extinction Rebellion has now applied to the High Court to set aside the NWBC Order, arguing that it is a breach of human rights **UKOP6: pages 350-351**. The Council has now also made an application to the Court asking it to make the following orders:

    (a) to list the case for a full hearing so that the Court can decide whether to make a final order;

    (b) to add 139 people who have been arrested as named Defendants;

    (c) to allow the Council to serve copies of the application by alternative means; and

    (d) to dismiss the application to set aside the NWBC Order.

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57. It is indicated that the Court hearing for these applications is likely to take place at the High Court in Birmingham but, as at the date of this witness statement, the date of the hearing has not yet been published.

58. The Claimants currently enjoy the benefit of the double protection afforded by the Order and the NWBC Order in relation to Site 2, and whilst the Claimants are hopeful that the application to set aside the NWBC Order will be unsuccessful, the Claimants cannot rely on the protection afforded by the NWBC Order continuing, and which makes it even more critical that the protection afforded by the Order remains in place.

For the reasons set out in this statement and the further witness statement made in support of this Application, I respectfully request that the Court grants the 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: DocuSigned by: 7FAFE9820F7D47D... Dated: 5th April 2023

John Michael Armstrong

Party: Claimants
Witness: Daniel Owen Christopher Talfan Davies
Exhibit: UKOP8
Dated: 14 April 2023

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

(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

THIRD 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 "**UKOP8**". 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 Peter Knox KC (sitting as Deputy High Court Judge) sealed on 21 April 2022 (the **"Order"**).

SERVICE OF PROCEEDINGS

5. I make this witness statement in order to evidence the Claimants' compliance with paragraph 16 of the Order in serving the following documents:

   (a) Sealed Application Notice for renewal of the interim injunction and listing of the renewal hearing on 20 April 2023 dated 4 April 2023;

   (b) Draft order for the renewal hearing on 20 April 2023 dated 4 April 2023;

   (c) Third Witness Statement of John Michael Armstrong dated 5 April 2023;

   (d) Exhibit UKOP6 dated 5 April 2023;

   (e) Second Witness Statement of Peter Malcolm Davis dated 5 April 2023; and

   (f) Exhibit UKOP7 dated 5 April 2023

   (together, the **"Court Documents"**).

Compliance with paragraph 16(a) of the Order- Site 1

6. On the instructions of John Armstrong being Director and General Manager for British Pipeline Agency Limited, the agent of the First Claimant, the appointed agent, Doug Sidwick, effected service of the Court Documents by placing copies of the Court Documents in clear transparent sealed containers at two prominent locations on the perimeter of Site 1 at approximately 12:10pm on 6 April 2023 (images of the containers appear at **UKOP8:356-359**).

Compliance with paragraph 16(a) of the Order- Site 2

7. On the instructions of John Armstrong being Director and General Manager for British Pipeline Agency Limited, the agent of the First Claimant, the appointed agent, Alan Noble, effected service of the Court Documents by placing copies of the Court Documents in clear transparent sealed containers at two prominent locations on the perimeter of Site 2 at approximately 10:30am on 6 April 2023 (images of the containers appear at (**UKOP8:360-365**).

Compliance with paragraph 16(b) of the Order

8. Between 4.45pm and 4.52pm on 5 April 2023, on my instructions, Jody Sanders of Fieldfisher, the Claimants' solicitors, uploaded all the Court Documents to https://ukop.azurewebsites.net, being the web link stated in the Order.

9. A screenshot of the web link page hosting the Court Documents (and all previous documents that have been served in these proceedings) appears at (**UKOP8:366**)**.**

Compliance with paragraph 16(c) of the Order

10. At 14:08pm on 6 April 2023, an email was sent on my behalf, to xr-legal@riseup.net (**UKOP8:367**) and at 14:09pm on 6 April 2023, an email was sent on my behalf to juststopoil@protonmail.co.uk, juststopoilpress@protonmail.com and juststopoil@protonmail.com (**UKOP8:368**) confirming that:

    (a) Mr Peter Knox KC sitting as Deputy Judge of the Chancery Division had made an order on 20 April 2022 which provided that a further return date hearing would be fixed for 20 April 2023 (the **"Return Date"**);

    (b) The Court has confirmed that the Return Date hearing will take place on 20 April 2023 at 7 Rolls Buildings, London, EC4A 1NL with the timing of the hearing and the court room in which it will take place to be confirmed;

    (c) A copy of the sealed Application Notice dated 4 April 2023 confirming this, along with a copy of the draft Order that has been filed at Court by the Claimants, can be viewed at the following weblink: https://ukop.azurewebsites.net;

    (d) The weblink at paragraph 10(c) above contains the Claimants' further evidence for the Return Date hearing, together with the court documents from the hearings of 8 and 20 April 2022;

    (e) 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 13 April 2023 and that service can be effected on the Claimants by serving on UKOPinjunction@fieldfisher.com; and

    (f) 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, which would be available at the weblink referred to at paragraph 10(c) above on 17 April 2023.

11. However, on 10 April 2023 at 10:20am, I received an email stating that *"The message you sent to juststopoil@protonmail.com couldn't be delivered due to: Recipient server unavailable or busy"* and that *"Recipient address rejected: Mailbox quota exceeded"* (**UKOP8:369**).

12. Further, on 10 April 2023 at 11:21am, I also received an email stating that *"The message you sent to juststopoil@protonmail.co.uk couldn't be delivered due to: Recipient server unavailable or busy"* (**UKOP8:370**). As set out at paragraph 19 of my second witness statement dated 14 April 2022, this email address had been included in the Order by reference to an earlier Court Order in different proceedings, whereas the email addresses that are published on Just Stop Oil's website are set out at paragraph 13 below.

13. The Just Stop Oil website lists the following email addresses as contact details, which my email of 14:09pm was sent to as outlined above:

    (a) juststopoilpress@protonmail.com (being an email address specified on Just Stop Oil's home page); and

    (b) juststopoil@protonmail.com (being the email address specified on Just Stop Oil's privacy policy page).

14. Screenshots of the relevant sections of the Just Stop Oil website are found at (**UKOP8:371-372**).

15. I can confirm that I have not received any further email or notification in relation to the email sent to juststopoilpress@protonmail.com informing me that this email could not be delivered.

Other documents for the Return Date hearing

16. I confirm that it is the Claimants' intention to serve its skeleton argument and the accompanying bundle in advance of the Return Date hearing in compliance with the methods specified at paragraph 16 of the Order and that a Certificate of Service confirming service in respect of the same will be filed at the Court following service of these documents.

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.iv.2023

Daniel Owen Christopher Talfan Davies

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Party: Claimant
Witness: Peter Malcolm Davis
Number: Third
Exhibit: UKOP10
Dated: 5 July 2023

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 / 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

THIRD WITNESS STATEMENT OF

PETER MALCOLM DAVIS

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I, Peter Malcolm Davis, of 5-7 Alexandra Road, Hemel Hempstead, Hertfordshire will say as follows:

1. I currently act as a Consultant on behalf of British Pipeline Agency Limited ("**BPA**") and have held this role since September 2021. I have worked for BPA for over thirty-five years and prior to becoming a consultant, I was a Director and General Manager of BPA.

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. BPA acts as agent for the First Claimant United Kingdom Oil Pipelines Limited ("**UKOP**") and the Second Claimant West London Pipeline and Storage Limited ("**WLPSL**"), and it operates and maintains their UK based assets.

4. I am duly authorised to make this witness statement on behalf of the Claimants.

5. 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.

6. Produced and shown to me is a bundle of documents containing exhibit "**UKOP10**". Unless otherwise stated, page references in this witness statement refer to pages in that exhibit.

7. Unless otherwise defined, in this statement I adopt the definitions set out in my first witness statement dated 7 April 2022 (the **"First Witness Statement"**).

CURRENT POSITION

8. I make this statement in support of the Claimants' application for summary judgment to obtain an order for final injunctive relief in the terms set out in the draft order.

9. The purpose of this third witness statement, which supplements my First Witness Statement and second witness statement dated 5 April 2023 (the "**Second Witness Statement**"), is to provide the Court with an update in respect of the Sites following the grant of an interim order for pre-emptive injunctive relief in these proceedings made by The Honourable Mr Justice Rajah following a hearing on 20 April 2023 (the "**Order**"). Whilst this third witness statement provides an update on these matters, which were addressed in my First Witness Statement and my Second Witness Statement, I otherwise confirm that the content of my First Witness Statement and my Second Witness Statement remains true and accurate.

UPDATE ON SITE 1

10. At paragraph 11 of my Second Witness Statement I stated that:

> "*The main entrance providing access to and egress from Site 1 continues to be to the right of Oil Road at the bottom right of the Site 1 Plan which leads right onto Green Lane and then on to the M1. However, the gates, which I refer to as being set back from the visibility splay, are going to shortly be relocated by BPA and will be repositioned at the edge of the visibility splay itself. It is anticipated that the works to relocate the gates will commence in the week of 17 April 2023 and will take up to two weeks to complete. I refer to the plan at UKOP7 page 2 indicating the current location of the gates, and where it is proposed that they will be positioned. The gates remain, and will remain once repositioned, permanently open when the terminal is operational to allow for free flow of access and egress.*"

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11. Since my Second Witness Statement, the gates have now been relocated to the position as shown on the plan at **UKOP7:353**. Images of the relocated gates are found are at **UKOP10:2-5**. Since that date, the gates have remained permanently open when the terminal is operational to allow free flow of access and egress, and there has been no change to the remaining entrances or access arrangements to Site 1 which I refer to at paragraph 41 of my First Witness Statement.

UPDATE ON SITE 2

12. At paragraph 31 of my First Witness Statement I stated that the Site 2 Lease was pending registration at the Land Registry.

13. The Site 2 Lease has since been registered under Land Registry leasehold title number WK522590. A copy of the register and title plan is at **UKOP10:6-9**.

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: DocuSigned by: Peter Davis 3C9737B4C1C3477... Dated: 05:07:2023

Peter Malcolm Davis

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Party: Claimant
Witness: John Michael Armstrong
Number: Fourth
Exhibit: UKOP9
Dated: 6 July 2023

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 / 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

FOURTH 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. BPA acts as agent for the First Claimant United Kingdom Oil Pipelines Limited ("**UKOP**") and the Second Claimant West London Pipeline and Storage Limited ("**WLPSL**"), and it operates and maintains their UK based assets.

4. I am duly authorised to make this witness statement on behalf of the Claimants.

5. 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.

6. Produced and shown to me is a bundle of documents containing exhibit "**UKOP9**". Unless otherwise stated, page references in this witness statement refer to pages in that exhibit.

7. Unless otherwise stated, in this statement I adopt the definitions set out in my first witness statement dated 7 April 2022.

CURRENT POSITION

8. I make this statement in support of the Claimants' application for summary judgment to obtain an order for final injunctive relief in the terms set out in the draft order.

9. The purpose of this third witness statement, which supplements my first, second and third witness statements dated 7 April 2022, 14 April 2022 and 5 April 2023 respectively (the **"Previous Witness Statements"**), is to provide to the Court with an update in respect of events following the grant of an interim order for injunctive relief in these proceedings made by the Honourable Mr Justice Rajah following a hearing on 20 April 2023 (the "**Order**") and therefore addresses:

   (a) evidence of direct action which has occurred 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 my witness statement dated 5 April 2023; and

   (c) evidence of direct action by Just Stop Oil and Extinction Rebellion, including where such action has targeted other organisations affiliated with the oil and gas sector which has occurred since the date of the Order.

DIRECT ACTION IN THE VICINITY OF SITE 1 AND SITE 2

10. In my first and second witness statements dated 7 April 2022 and 14 April 2022, I addressed in detail the direct action suffered by the Claimants in respect of Site 1 and the direct action targeted at the operations of the Claimants in close proximity to Site 1 and Site 2. This direct action formed the basis for the Claimants seeking an interim order for pre-emptive injunctive relief.

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11. In my third witness statement dated 5 April 2023, I addressed the further incidents of direct action in close proximity to Site 2 since the date of the order for pre-emptive injunctive relief made by Mr Peter Knox KC acting as a Deputy High Court Judge in the Chancery Division following a hearing on 20 April 2022 (the "**April 2022 Order**").

12. Since the date of the Order, there has been no further direct action at, or in the vicinity of, Site 1 and Site 2. However, I believe that the reduction in direct action is due to a number of factors which I refer to at paragraph 20 in my third witness statement dated 5 April 2023, including:

    (a) the service of the April 2022 Order and the Order at the Sites and by email to the campaign groups Extinction Rebellion and Just Stop Oil;

    (b) the April 2022 Order and the Order providing a deterrent effect. For example, in response to a member of the public tweeting:

        "*They are in the wrong place. Outside oil refineries would be the right place to protest. Then of course they would not get the publicity they crave. Stopping workers only make their protest null and void."*

        on 9 June 2023 at 10.20am Just Stop Oil tweeted:

        "*Do you know what happens if you protest outside oil refineries now? Oil companies have bought injunctions to ban people from taking action at refineries, distribution hubs, even petrol stations. Punishments for breaking injunctions range from unlimited fines to imprisonments*"

        Extinction Rebellion UK retweeted the above tweet on 9 June 2023 **UKOP9: page 8**;

    (c) the continuing existence of an injunction order made by Mr Justice Soole on 20 January 2023 in favour of Valero Energy Limited, Valero Logistics UK Limited and Valero Pembrokeshire Oil Terminal Limited (together, "**Valero**") and which protects a number of Valero's sites including land interests at Kingsbury Oil Terminal (of which Site 2 forms part) (the **"Valero Order"**). A copy of the Valero Order can be found at **UKOP6: pages 85-124;** and

    (d) the continuing existence of an injunction order made by Mr Justice Sweeting in the King's Bench Division dated 9 May 2022 in favour of the North Warwickshire Borough Council and which protects the locality of the Kingsbury Oil Terminal (of which Site 2 forms part) by placing restraints on the organisation of, or participation in, any protest against the production or use of fossil fuels at Kingsbury Oil Terminal (the "**NWBC Order**"). In particular, the NWBC Order gives a power of arrest outside the Kingsbury Oil Terminal and at the junctions of the roads leading into it. A copy of the NWBC Order can be found at **UKOP6: pages 125-131.** The NWBC Order remains in force as at the date of this witness statement. However, an application has been made to set aside the NWBC Order, which application I refer to at paragraph 49 below.

13. If any of these factors were to be removed, I believe that the direct action would escalate.

14. The deterrent effect provided by the Order continues to assist the Claimants in ensuring that they can conduct their operations at the Sites without risk of the significant practical, financial and logistical implications for the Claimants, many other third parties and potentially the UK economy, which would otherwise arise from direct action, not to mention the substantial health and safety risks that I refer to in paragraphs 20 to 42 of my first witness statement.

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EVIDENCE OF DIRECT ACTION BY JUST STOP OIL AND EXTINCTION REBELLION, INCLUDING TARGETING OF OTHER OPERATORS AND AFFILIATED ORGANISATIONS FROM 5 APRIL 2023 TO 6 JULY 2023

15. Since the date of the Order, there continues to be activity targeted at industries and organisations that members of Extinction Rebellion and / or Just Stop Oil consider to be affiliated to the oil and gas industries.

16. On 24 April 2023, Just Stop Oil announced a new campaign involving disruption across central London by marching slowly on major roads as part of an *"indefinite campaign of civil resistance to demand an end to new UK oil and gas projects*" **UKOP9: pages 9-10**

17. On 12 June 2023, the Metropolitan Police confirmed that there had been 156 slow marches since the end of April, with 86 arrests and 49 charges made **UKOP9: pages 11-12**. As of 6 July 2023, Just Stop Oil supporters have completed up to seven marches a day, six days a week since the campaign commenced on 24 April 2023, causing disruption and blockage to traffic on major roads across London (**UKOP9: pages 13-152)** including:

    (a) On 3 May 2023, 55 Just Stop Oil supporters began marching at The Shell Centre on London's South Bank aiming for Parliament Square. The police served a notice under section 12 of the Public Order Act 1986 (a **"section 12 notice"**) on the protesters **UKOP9: pages 21-25.** I understand a section 12 notice is served where a senior police officer gives directions such as conditions on public processions as necessary where they reasonably believe there could be, for example, serious public disorder, serious damage to property or serious disruption to the life of the community;

    (b) On 11 May 2023, around 41 supporters set off marching down the Strand. After police threatened public order notices, they briefly moved to the pavement, before returning to the road at Parliament Square, where police subsequently arrested around 13 supporters **UKOP9: pages 30-31**;

    (c) On 23 May 2023, 45 supporters marched through three major London routes, being on Blackfriars Bridge, London Bridge and Tower Bridge. This caused major disruption delays for road users, including commuters, and police issued public order notices on all three groups of participating protesters **UKOP9: pages 44-45**;

    (d) On 24 May 2023, 39 Just Stop Oil protesters marched on roads in Islington, Marylebone and the City of London. A section 12 notice was served and six protesters were arrested for remaining on the road in breach of this notice **UKOP9: pages 46-49**;

    (e) On 29 May 2023, 31 Just Stop Oil supporters marched down Upper Street in Islington, 41 supporters marched down Holloway Road in Islington and 9 supporters disrupted traffic outside Wimbledon Magistrates Court. It was reported that supporters were acting in solidarity with the protesters charged following the events at the Rugby Premiership final on 27 May 2023, as referred to at paragraph 28 below **UKOP9: pages 54-55**;

    (f) On 30 May 2023, police served section 12 conditions on Just Stop Oil demonstrators causing disruption and forcing traffic to a crawl during rush hour by marching on Waterloo Bridge, Tower Bridge, London Bridge and Blackfriars Bridge **UKOP9: pages 56-59**;

    (g) On 1 June 2023, around 50 Just Stop Oil supporters marched in five groups on roads around Hyde Park and Battersea Park and a smaller group walking on Kensington Gore delayed the England Cricket Team coach. Police served a section 12 notice in order to move the supporters off the road. On the same date, a further march took place on Waterloo Bridge, where three people were arrested **UKOP9: pages 62-64**;

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(h) On 5 June 2023, around 75 Just Stop Oil supporters marched in four groups in West, East and South London, with two supporters being arrested by police in Vauxhall **UKOP9: pages 68-73**;

(i) On 7 June 2023, eight arrests were made as 54 Just Stop Oil protesters marched along key routes in in Hammersmith, Islington and Bayswater and following a second set of marches in the West End, City Fulham and Borough **UKOP9: pages 74-76**;

(j) On 14 June 2023, Just Stop Oil supporters marched at ten locations across London, including Westminster Bridge, London Bridge, Tower Bridge and other major routes in Central London along with roads around West London. Nine protesters were arrested at various locations for refusing to leave the road or comply with conditions imposed by officers **UKOP9: pages 94-98**;

(k) On 15 June 2023, 54 Just Stop Oil supporters marched in four groups on roads around Ealing and Battersea Bridge. Nine supporters were arrested at Hanger Lane in Ealing for failing to comply with a section 12 notice **UKOP9: pages 99-102**;

(l) On 20 June 2023, 26 Just Stop Oil supporters slow marched on Queen Victoria Street near Mansion House tube station and continuing on key roads through the City until police served a section 12 notice **UKOP9: pages 109-111**;

(m) On 26 June 2023, Just Stop Oil supporters carried out four separate slow marches across London, which included blocking Denmark Hill in Camberwell, close to the hospital entrance of King's College Hospital. Metropolitan Police issued a Section 12 condition for the Just Stop Oil supporters to move out of the carriageway **UKOP9: pages 119-130**;

(n) On 27 June 2023, 34 Just Stop Oil supporters launched a slow march across London Bridge. Police were called and a section 12 notice was issued **UKOP9: pages 131-136**; and

(o) On 30 June 2023, a group of 25 student Just Stop Oil supporters disrupted traffic outside Waterloo Station. Following a section 12 notice being issued by the Metropolitan Police, the supporters then moved to Parliament Square. A Just Stop Oil press release confirmed that three of the supporters were defying bail conditions by protesting at Parliament Square **UKOP9: pages 141-144.**

18. On 9 June 2023 and 15 June 2023 Just Stop Oil posted tweets indicating that protesters were breaking bail conditions to join the slow marches **UKOP9: pages 153-154**.

19. In addition to the slow march campaign, members of Extinction Rebellion and Just Stop Oil continue to carry out direct action at public locations and events.

20. On 10 April 2023, it was reported that two Just Stop Oil protesters breached a security barrier and climbed the "*Dippy the Diplodocus*" exhibition at the Herbert Art Gallery and Museum in Coventry, which resulted in the museum closing for the day. The protesters were apprehended by the security guards, arrested by West Midlands Police on conspiracy to cause criminal damage and subsequently charged with having an article with intent to destroy or damage property **UKOP9: pages 155-160.**

21. On 17 April 2023, the World Snooker Championship was disrupted by an individual climbing on the snooker table and covering it in orange powder during a match, whilst another individual attempted to glue herself to the table during another match. It was later reported that Just Stop Oil had claimed responsibility for the incident. The two protesters were arrested by South Yorkshire Police. **UKOP9: pages 161-163**.

22. On 3 May 2023, activists from Extinction Rebellion addressed Barclays' annual general meeting being held at the QEII Centre in Westminster. It was reported that a number of protesters were removed by security **UKOP9: pages 164-171**.

23. On 17 May 2023, it was reported that Just Stop Oil protesters disrupted a policing inquiry regarding King Charles' Coronation. One of the activists stood up and stated "*We, as supporters of Just Stop Oil, are here today because our democracy is under threat"* before being removed from Parliament **UKOP9: pages 172-175**.

24. On 18 May 2023, Extinction Rebellion infiltrated the AGM of Lloyds Banking Group at the Armadilo in Glasgow. It was reported that the protesters had repeatedly interrupted the chairman's opening speech to criticise the bank's alleged increased financial support of the fossil fuel industry and others stood outside the venue displaying banners which read "*Lloyds take the next steps…renounce fossil fuels"* **UKOP9: pages 176-180**.

25. On 23 May 2023, it was reported that Extinction Rebellion activists had interrupted the opening remarks at the annual general meeting of Shell, condemning the fossil fuel giant and shouting "*shut down Shell*" and "*go to hell Shell*". A number of protesters were carried from or escorted out of the auditorium. Extinction Rebellion UK also tweeted on 23 May 2023 at 10:18am *"Join us to #ShutDownShell and demand #NoNewOilAndGas"* **UKOP9: pages 181-187**.

26. On 25 May 2023, Lloyd's of London annual general meeting was targeted by Money Rebellion, which has been reported as being a sister movement of Extinction Rebellion. Protesters set off fire alarm sirens and smoke flares outside Lloyd's' headquarters in London as their annual general meeting was being held inside **UKOP9: pages 187-189**.

27. On 25 May 2023, it was reported that Just Stop Oil protesters had vandalised one of the show gardens at Chelsea Flower Show by throwing orange paint powder. Commander Karen Findlay of the Metropolitan Police's major operations team commented that the gardens had been *"criminally damaged"* and the three protesters involved were arrested **UKOP9: pages 190-193**.

28. On 27 May 2023, it was reported that two Just Stop Oil supporters had stormed the pitch with orange powder paint during the Gallagher Premiership Rugby final at Twickenham. Just Stop Oil's press release after the event stated "*Just Stop Oil is calling on everyone to get off the sidelines and join in civil resistance against new oil gas and coal… Our indefinite campaign of civil resistance is underway and will not end until our government makes a meaningful statement halting new fossil fuel projects in the UK"* **UKOP9: pages 194-196**.

29. On 9 June 2023, Just Stop Oil staged its first "slow cycle" down Park Lane in London's West End and the police served a section 12 notice due to the disruption caused to traffic. It was reported that the slow cycle was in a response to the government's attempts to clamp down on marching activists and a spokesperson for Just Stop Oil confirmed "*our tactics will continue to evolve"* **UKOP9: pages 197-199**.

30. On the same date, Extinction Rebellion activists glued themselves to Schlumberger's research facility in Cambridge, a company reported as providing technology and infrastructure for oil and gas extraction to firms such as BP and Shell. It was reported that the protestors were calling on the University of Cambridge to cut ties with the company **UKOP9: pages 200-202**.

31. On 15 June 2023, three Just Stop Oil protesters disrupted an opera performance at Glyndebourne Festival in Sussex by setting off a confetti bomb, blowing an air horn and shouting. Just Stop Oil tweeted after the event to confirm that they had interrupted the festival and that "*We are running out of time. Take action with Just Stop Oil"* **UKOP9: pages 203-204**.

32. On 27 June 2023, four Just Stop Oil protesters entered the lobby of the energy firm TotalEnergies', UK headquarters and doused it with black paint from fire extinguishers. Four additional activists also covered the exterior of the building with orange paint. It was reported that Scotland Yard arrested four people on suspicion of criminal damage. One of the protesters taking action was reported as stating *"I wish we could stop these atrocities through peaceful and quiet protest, but we can't."* **UKOP9: pages 205-209**.

33. On 28 June 2023, two Just Stop Oil protesters entered the playing field during one of the England v Australia test matches at Lord's cricket ground to spread orange powder on the pitch and another protester was prevented from accessing the pitch by security. These actions delayed the game and the Metropolitan Police announced that three arrests were made after the protest. The three protesters were subsequently charged with aggravated trespass **UKOP9: pages 210-214**.

34. On 1 July 2023, it was reported that seven Just Stop Oil protesters were arrested after having interrupted London Pride by sitting in front of a Coca-Cola company float, accusing Coca-Cola of being *"the world's worst plastic polluter, accused of numerous human rights abuses"*. Two other protesters sprayed paint across the road. Five of the protesters halting the Coca-Cola float were subsequently charged with Public Order offences **UKOP9: pages 215-220.**

35. On 3 July 2023, as part of their "Cut the Ties" with the fossil fuel industry campaign, climate activists, including members of Extinction Rebellion, protested outside Wood Group's Aberdeen and Surrey offices to protest the engineering firm's ties to the oil and gas sector, including setting off flares and spraying fake black oil across the entrance of the Surrey offices Two Extinction Rebellion activists were arrested for alleged criminal damage **UKOP9: pages 221-227.**

36. On 5 July 2023, Just Stop Oil protesters ran onto Court 18 at Wimbledon, disrupting a match and throwing orange-coloured confetti and a jigsaw on the grass. One protester also sat down on the Court by the net. A statement from Just Stop Oil said "*we can't leave it to the next generation to pick up the pieces*". Two of the protesters were arrested on suspicion of aggravated trespass and criminal damage **UKOP9: pages 228-233.**

STATEMENTS FROM EXTINCTION REBELLION AND JUST STOP OIL

37. At paragraphs 45 and 46 of my third witness statement dated 5 April 2023, I referred to the statement published by Extinction Rebellion on 1 January 2023 indicating that they would *"temporarily shift away from public disruption as a primary tactic"*, suggesting a shift in tactics and strategy. However, subsequent actions taken by the group, as referred to at paragraphs 37 to 41 and 43 of my third witness statement indicated that Extinction Rebellion was continuing to target companies and organisations, which are affiliated to the oil and gas industry with unlawful direct action. The recent action taken by Extinction Rebellion, as referred to above, indicates that the targeting of companies and organisations affiliated to the oil and gas industry is continuing, notwithstanding the public statement, and that to the extent that there was any shift away from public disruption, that disruption was only temporary.

38. Extinction Rebellion also appear to be focused on mobilising new members to their campaign. For example, at paragraph 54 of my third witness statement dated 5 April 2023, I referred to "*The Big One"* event organised by Extinction Rebellion due to take place on 21 April 2023. The event took place as planned and ran for four days with over 60,000 people in attendance and 200 participating organisations. The event included pickets outside the entrances to every major government department in Whitehall, a bio-diversity march and "die-in" and protests in Parliament Square **UKOP9: pages 234-252**. Extinction Rebellion have confirmed "*over the next three months, we will be translating the appetite for action amongst people at The Big One into a whole new range of campaigns and action across the country"* **UKOP9: pages 250**.

39. In relation to Just Stop Oil, as outlined above at paragraphs 16 to 18, Just Stop Oil are currently engaging in a sustained campaign of slow marches across central London, as well as disrupting public and high profile events as outlined at paragraphs 20 to 34. In announcing the campaign of slow marches, a spokesperson for Just Stop Oil in their press release on 24 April 2023 stated that *"we have chosen to act. Civil resistance is our only hope... We won't stop until our genocidal government ends new oil and gas"* **UKOP9: page 254.**

40. Just Stop Oil also appear to be attempting to recruit members to join in the protests, for example, by making multiple posts on Twitter inviting individuals to sign up to slow march and to *"Take action"* with Just Stop Oil **UKOP9: pages 256-257**. A press release by Just Stop Oil on 29 June 2023 also stated *"Just Stop Oil is calling on everyone to get off the sidelines and join in civil resistance against new oil, gas and coal"* **UKOP9: page 260**.

41. Similarly, Just Stop Oil's press release following the interruption to the Gallagher Premiership Rugby final outlined at paragraph 28 above stated *"Our indefinite campaign of civil resistance is underway and will not end until our government makes a meaningful statement halting new fossil fuel projects in the UK"* **UKOP9: page 196**.

42. Combined, this suggests that the fossil fuel industry (and any organisations affiliated with that industry) remains the target of Just Stop Oil's campaign and that Just Stop Oil are intending to continue their campaign, involving as many members as possible, without any discernible end date.

43. For example, in the press release by Just Stop Oil on 28 June 2023 after the disruption to the Ashes cricket match outlined at paragraph 33 above, it was reported that Just Stop Oil commented that the Lords' cricket grounds'

> *"'principal partner' is JP Morgan, the world's worst "fossil bank," that contributed $317 billion in fossil fuel financing from 2016 to 2020"* **UKOP9:page 263**.

TotalEnergies also appears to have been targeted, as referred to above at paragraph 32, as it is a shareholder in the East African Crude Oil Pipeline (as well as being an energy company itself) **UKOP9: pages 205-209**.

44. The materials that have been published on Just Stop Oil's and Extinction Rebellion's websites as well as the groups respective social media channels therefore continue to indicate that oil and gas companies will remain a target of their campaign, and there therefore remains a risk to the Claimants' sites which the order in the terms sought would protect against.

OTHER INJUNCTION PROCEEDINGS

45. In addition to the Valero Order outlined above at paragraph 12(c), I am aware that there have been a number of other injunction orders granted to oil and gas companies in relation to protests against the industry. I have set out below a summary of the injunctions that have been obtained, which summary has been provided to me by the Claimants' solicitors:

Claim Number	Property	Claimant(s)	Duration of injunction
QB-2022-001259	Shell Centre Tower	Shell International Petroleum Company Limited	Initial interim injunction

			extended on 28 April 2023 until 25 May 2023 Extended until 12 May 2024
QB-2022-001241	Shell Haven Site	Shell UK Limited	Initial interim injunction extended on 28 April 2023 until 25 May 2023 Extended on 23 May 2023 until 12 May 2024
QB-2022-001420	Petrol filling station	Shell UK Oil Products Limited	Initial 12 months expiring on 12 May 2023 Extended on 28 April 2023 until 25 May 2023 Further extended on 23 May 2023 until 12 May 2024
PT-2022-000326	Oil terminals at Stanlow, Ellesmere Port, Tranmere, Birkenhead and Northampton	Essar Oil (UK) Limited and others	Initial 12 months expiring on 11 May 2023. Extended on 11 May 2023 until 11 May 2024.

46. In addition to the NWBC Order, I am also aware that further injunctions have been obtained by parties against persons unknown including those affiliated or connected to the Extinction Rebellion, Just Stop Oil and/or Insulate Britain campaigns. I have set out below a summary of the injunctions that have been obtained, which summary has been provided to me by the Claimants' solicitors:

Claim Number	Property/Land	Claimant(s)	Duration of injunction
KB-2022-001317	Roads in the vicinity of Navigator Terminals Thurrock terminal; Esso's Purfleet terminal; Exoleum's Grays	Thurock Council Essex County Council	Until further order with provision for Claimants to inform the Court within 28 days of the Supreme Court

	terminal; and Oikos' Canvey Island terminal		judgment in Wolverhampton City Council & Ors v London Gypsies and Travellers & Ors (UKSC/2022/0046)
KB-2022-004333	Structures over, under or adjacent to the M25 Motorway	National Highways	Initial interim injunction granted until 10 December 2022 Extended by 12 months until 15 November 2023
QB-2021-003576 QB-2021-003626 QB-2021-003737	M25, M25 feeder roads and Kent roads	National Highways	Initial 12 month injunction expiring on 9 May 2023 Extended the interim injunction on 5 May 2023 until 10 May 2024 with a renewal hearing on 26 April 2024
QB-2021-003841	Multiple A roads, bridges and tunnels in London	Transport for London	Final injunction until 2 May 2028 with an annual review hearing
KB-2022-003542	Multiple Roads, bridges and tunnels in London	Transport for London	Final injunction until 2 May 2028 with an annual review hearing

SUMMARY

47. The evidence set out above, as well as in my Previous Witness Statements, confirms that there continues to be frequent and significant direct action undertaken by Just Stop Oil and Extinction Rebellion, and which continues to target those affiliated with the oil and gas industry. There is also no clear end date to the action, in fact, the scale of the action has escalated since my first witness statement, and both organisations would appear to be focused on mobilising their supporters and recruiting new members to their campaigns.

48. As referred to at paragraph 55 of my third witness statement dated 5 April 2023, given the importance of the Sites covered by the Order, Just Stop Oil and Extinction Rebellions continuing campaigns, and the highly disruptive and inherently dangerous effect of their protesting techniques, means that I continue to believe that in the absence of further final injunctive relief being granted in the terms sought, there is a real risk of imminent trespass on the Sites and / or interference with the private access routes in relation to both Sites, and this risk would be unlikely to abate in the near or medium future. 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 by continuing the deterrent effect that appears to have arisen by virtue of the continuing relief granted by the Order.

49. I refer above and in my third witness statement (at paragraphs 56 to 58) to the fact that the Claimants currently enjoy the benefit of the double protection afforded by the NWBC Order and the Order. However, the NWBC Order remains subject to an application to set aside. It therefore remains the case that the Claimants cannot rely on the protection afforded by the NWBC Order continuing, and which therefore makes it critical that the injunctive protection sought by the Claimants continues.

For the reasons set out in this statement and the Previous Witness Statements, I respectfully request that the Court grants final injunction on the terms 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: DocuSigned by: 7FAFE9820F7D47D... Dated: 6 July 2023

John Michael Armstrong

Party: Claimants
Witness: Antony Douglas Phillips
Exhibit: UKOP11
Dated: 24 July 2023

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

FIRST WITNESS STATEMENT OF

ANTONY DOUGLAS PHILLIPS

I, Antony Douglas Phillips, 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 "**UKOP11**". 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 the Honourable Mr Justice Rajah sealed on 21 April 2023 (the **"Order"**).

SERVICE OF APPLICATION

5. I make this witness statement in order to evidence the Claimants' compliance with paragraph 9 of the Order in serving the following documents:

   (a) Sealed Application Notice – Claimants' Summary Judgment Application dated 7 July 2023 containing details of listing appointment;

   (b) Draft Order for Claimants' Summary Judgment Application dated 7 July 2023;

   (c) Third Witness Statement of Peter Davis dated 5 July 2023;

   (d) Fourth Witness Statement of John Armstrong dated 6 July 2023;

   (e) Exhibit UKOP9; and

   (f) Exhibit UKOP10

   (together, the **"Application Documents"**).

Compliance with paragraph 9(a) of the Order

6. Between 10 July 2023 at 5:44pm and 11 July 2023 at 11:09am, on my instructions, Jody Sanders of Fieldfisher, the Claimants' solicitors, uploaded all of the Application Documents to https://ukop.azurewebsites.net, being the web link stated in the Order.

7. A screenshot of the web link page hosting the Application Documents (and all previous documents that have been served in these proceedings) appears at (**UKOP11:3**).

Compliance with paragraph 9(b) of the Order

8. At 15:39pm on 11 July 2023, an email was sent by Faye Hyland of Fieldfisher to xr-legal@riseup.net (**UKOP11:4-5**) and at 15:38pm on 11 July 2023, an email was sent by Faye Hyland of Fieldfisher to juststopoil@protonmail.co.uk, juststopoilpress@protonmail.com and juststopoil@protonmail.com (**UKOP11:6**) confirming that:

   (a) On 7 July 2023 the Claimants made an application for summary judgment under Part 24 of the Civil Procedure Rules (the "**Application**"), seeking an order from the Court for a final injunction in the claim and an order for related directions;

   (b) Copies of the Application Documents can be viewed at the following weblink: https://ukop.azurewebsites.net;

(c) The Court has directed that a listing appointment for the Application should take place at 11.00am on 17 July 2023, at which appointment the Court will fix the date of the Application hearing, and further details of which can be found in the sealed Application Notice;

(d) Any individual who way wish to come forward to defend the Application is referred to Civil Procedure Rule 24.5(1) in that if the defendant to an application for summary judgment wishes to rely on written evidence at the hearing, he must file the written evidence and serve copies on the claimant at least 7 days before the summary judgment hearing; and

(e) We (i.e. Fieldfisher) are authorised to accept service for and on behalf of the Claimants and that service of any evidence can be affected by emailing the relevant documents to UKOPinjunction@fieldfisher.com.

9. The Just Stop Oil website lists the following email addresses as contact details, which my email of 11 July 2023 at 15:37pm was sent to:

(a) juststopoilpress@protonmail.com (being an email address specified on Just Stop Oil's home page); and

(b) juststopoil@protonmail.com (being the email address specified on Just Stop Oil's privacy policy page).

10. Screenshots of the relevant sections of the Just Stop Oil website are found at (**UKOP11:7-8**).

11. On 11 July 2023 at 15:39pm, an automatically generated response was received from xr-legal@riseup.net with the subject line "*Autoreply for XR Legal Support*" and which confirmed that the XR Legal Support Team had received Fieldfisher's email of 11 July 2023 and was "*working on getting a response to you ASAP!*" A copy of the email received appears at (**UKOP11:5**).

12. I can confirm that, as at the date of this statement:

(a) No further correspondence from the email address xr-legal@riseup.net has been received;

(b) No correspondence or notifications have been received in relation to the emails sent to juststopoil@protonmail.co.uk, juststopoilpress@protonmail.com and juststopoil@protonmail.com.

SERVICE OF NOTICE OF HEARING

13. I also make this witness statement in order to evidence the Claimants' compliance with paragraph 9 of the Order in serving the following document:

(a) Sealed Application Notice – Claimants' Summary Judgement Application dated 7 July 2023 containing Notice of Hearing (the "**Notice of Hearing**").

Compliance with paragraph 9(a) of the Order

14. On 18 July 2023 at 1:04pm, on my instructions, Jody Sanders of Fieldfisher, the Claimants' solicitors, uploaded the Notice of Hearing to https://ukop.azurewebsites.net, being the web link stated in the Order.

15. A screenshot of the web link page hosting the Notice of Hearing (and all previous documents that have been served in these proceedings) appears at (**UKOP11:3**).

Compliance with paragraph 9(b) of the Order

16. At 16:35pm on 18 July 2023, an email was sent by Honey Newbury for and on behalf of Faye Hyland of Fieldfisher to xr-legal@riseup.net (**UKOP11:9-10**) and at 16:35pm on 18 July 2023, an email was sent by Honey Newbury for and on behalf of Faye Hyland of Fieldfisher to juststopoil@protonmail.co.uk, juststopoilpress@protonmail.com and juststopoil@protonmail.com (**UKOP11:11**) confirming that:

    (a) Following the listing appointment on 17 July 2023, the Court has now issued a Notice of hearing which states that the Application will be heard at 7 Rolls Buildings, London, EC4A 1NL during a three day window starting on 3 October 2023 with the time and Court TBC;

    (b) A copy of the Notice of Hearing can be viewed at the following weblink: https://ukop.azurewebsites.net;

    (c) Any individual who way wish to come forward to defend the Application is referred to Civil Procedure Rule 24.5(1) in that if the defendant to an application for summary judgment wishes to rely on written evidence at the hearing, he must file the written evidence and serve copies on the claimant at least 7 days before the summary judgment hearing; and

    (d) We (i.e. Fieldfisher) are authorised to accept service for and on behalf of the Claimants and that service of any evidence can be affected by emailing the relevant documents to UKOPinjunction@fieldfisher.com.

17. On 18 July 2023 at 16.36pm, an automatically generated response was received from xr-legal@riseup.net with the subject line "*Autoreply for XR Legal Support*" and which confirmed that the XR Legal Support Team had received Fieldfisher's email of 18 July 2023 and was "*working on getting a response to you ASAP!*" A copy of the email received appears at (**UKOP11:10**).

18. I can confirm that, as at the date of this statement:

    (a) No further correspondence from the email address xr-legal@riseup.net has been received;

    (b) No correspondence or notifications have been received in relation to emails sent to juststopoil@protonmail.co.uk, juststopoilpress@protonmail.com and juststopoil@protonmail.com.

Other documents for the Application Hearing

19. I confirm that it is the Claimants' intention to serve its skeleton argument and the accompanying bundle in advance of the hearing in compliance with the methods specified at paragraph 9 of the Order and that a Certificate of Service confirming service in respect of the same will be filed at the Court following service of these documents.

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: 24/7/2023

Antony Douglas Phillips

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Party: Claimant
Witness: John Michael Armstrong
Number: Fifth
Exhibit: UKOP12
Dated: 22 September 2023

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 / 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

FIFTH WITNESS STATEMENT OF

JOHN MICHAEL ARMSTRONG

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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 1,000km of fuel pipes in the UK.

3. BPA acts as agent for the First Claimant United Kingdom Oil Pipelines Limited ("**UKOP**") and the Second Claimant West London Pipeline and Storage Limited ("**WLPSL**"), and it operates and maintains their UK based assets.

4. I am duly authorised to make this witness statement on behalf of the Claimants.

5. 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.

6. Produced and shown to me is a bundle of documents containing exhibit "**UKOP12**". Unless otherwise stated, page references in this witness statement refer to pages in that exhibit.

7. Unless otherwise stated, in this statement I adopt the definitions set out in my first witness statement dated 7 April 2022.

CURRENT POSITION

8. I make this further statement in support of the Claimants' application for summary judgment to obtain an order for final injunctive relief in the terms set out in the draft order.

9. This fifth witness statement supplements:

   (a) my first witness statement dated 7 April 2022 ("**First Witness Statement**");

   (b) my second witness statement dated 14 April 2022 ("**Second Witness Statement**");

   (c) my third witness statement dated 5 April 2023 ("**Third Witness Statement**"); and

   (d) my fourth witness statement dated 6 July 2023 ("**Fourth Witness Statement**");

   together my **"Previous Witness Statements"**.

10. The purpose of this fifth witness statement is to provide the Court with an update in respect of relevant events following the grant of an interim order for injunctive relief in these proceedings made by the Honourable Mr Justice Rajah following a hearing on 20 April 2023 (the "**Order**") and since my Fourth Witness Statement, and therefore addresses:

    (a) evidence of direct action which has occurred in the vicinity of Site 1 and Site 2;

    (b) evidence of direct action targeted at other operators; and

    (c) evidence of direct action by Just Stop Oil and Extinction Rebellion, including where such action has targeted other organisations affiliated with the oil and gas sector.

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DIRECT ACTION IN THE VICINITY OF SITE 1 AND SITE 2

11. In my First Witness Statement and Second Witness Statement, I addressed in detail the direct action suffered by the Claimants in respect of Site 1 and the direct action targeted at the operations of the Claimants in close proximity to Site 1 and Site 2. This direct action formed the basis for the Claimants seeking an initial interim order for pre-emptive injunctive relief.

12. In my Third Witness Statement, I addressed the further incidents of direct action in close proximity to Site 2 since the date of the order for pre-emptive injunctive relief made by Mr Peter Knox KC acting as a Deputy High Court Judge in the Chancery Division following a hearing on 20 April 2022.

13. In my Fourth Witness Statement, I confirmed that there had been no further direct action at, or in the vicinity of, Site 1 and Site 2. Since the date of my Fourth Witness Statement that remains the position. However, I refer to paragraph 20 of my Third Witness Statement and paragraph 12 of my Fourth Witness Statement which set out a number of factors which I believe contributed to the reduction in direct action, including the continuing existence of the injunction granted in these proceedings protecting Sites 1 and 2. I continue to believe that, if any of those factors were to be removed, the direct action would escalate.

14. One of the factors mentioned at paragraph 12(d) of my Fourth Witness Statement is the continuing existence of an injunction order made by Mr Justice Sweeting in the King's Bench Division dated 9 May 2022 in favour of the North Warwickshire Borough Council and which protects the locality of the Kingsbury Oil Terminal (of which Site 2 forms part) (the **"NWBC Order"**) **UKOP6: pages 125-131**. At paragraph 49 of my Fourth Witness Statement, I referred to a third party's application to set aside the NWBC Order. Since the date of my Fourth Witness Statement, I have seen that the application to set aside the NWBC Order was withdrawn by agreement **UKOP12: pages 6 - 7**. On 8 August 2023, the Court made an order which I understand means that the injunction granted by the NWBC Order remains in place for the time being, but that there would be a final trial of NWBC's claim on the first available date in November 2023 (the **"2023 NWBC Order"**) **UKOP12: pages 8-17**. I refer further to this at paragraph 41 below.

15. I still consider that the deterrent effect provided by the Order continues to assist the Claimants in ensuring that they can conduct their operations at the Sites without risk of the significant practical, financial and logistical implications for the Claimants, for many other third parties and potentially for the UK economy, being implications that would otherwise arise from direct action. In addition, there are also the substantial health and safety risks that arise from direct action to which I refer in paragraphs 20 to 42 of my First Witness Statement.

EVIDENCE OF DIRECT ACTION BY JUST STOP OIL AND EXTINCTION REBELLION, INCLUDING TARGETING OF OTHER OPERATORS AND AFFILIATED ORGANISATIONS FROM 6 JULY 2023 TO 22 SEPTEMBER 2023

16. Since the date of my Fourth Witness Statement, there continues to be activity targeted at industries and organisations that members of Extinction Rebellion and / or Just Stop Oil consider to be affiliated to the oil and gas industries.

17. Paragraph 16 of my Fourth Witness Statement referred to the announcement by Just Stop Oil on 24 April 2023 of a new campaign involving disruption across central London by marching slowly on major roads as part of an "*indefinite campaign of civil resistance to demand an end to new UK oil and gas projects*" **UKOP9: pages 9-10**. Paragraph 17 of my Fourth Witness Statement detailed some of the slow marches carried out by Just Stop Oil between 5 April 2023 and 6 July 2023. Since that date, Just Stop Oil have continued to slow march and cause disruption across both London and England (**UKOP12: pages 18 – 87**). As of 20 July 2023, it was reported that there had been over 2,350 arrests and 138 people imprisoned since 14 February 2022 **UKOP12: pages 64-66**.

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Further examples of the slow marches that have been reported as having been carried out since 6 July 2023, both in London and across England, include the following:

(a) On 6 July 2023, groups of Just Stop Oil supporters marched in Southwark, Tower Hamlets, Tower Bridge and Vauxhall. Section 12 notices were served to remove the protesters from the roads. As set out at paragraph 17(a) of my Fourth Witness Statement, I understand that a section 12 notice is served where a senior police officer gives directions, such as conditions on public processions, as necessary where they reasonably believe there could be, for example, serious public disorder, serious damage to property or serious disruption to the life of the community **UKOP12: pages 18 – 21**.

(b) On 7 July 2023, 26 supporters in 3 groups began marches in Vauxhall and Pimlico and blocked both directions of traffic on Vauxhall Bridge Road leading to Victoria. Section 12 notices were issued **UKOP12: pages 22 – 24**.

(c) On 10 July 2023, marking the twelfth week of "*continuous civil resistance*", several marches began across London, including in Kensal Rise, Hampstead, Holborn and Oxford Street. Section 12 notices were issued, with five arrests made in Holborn and Oxford Street, and four people charged on 11 July 2023 with breach of a section 12 condition to move off the carriageway **UKOP12: pages 25 – 31**.

(d) On 12 July 2023, Just Stop Oil supporters marched in several areas of London, including around Hamleys toy store. Section 12 notices were served at Tower Bridge. At a further "Mums March" with 24 protesters on the same date, three people were arrested for breach of a section 12 notice due to refusing to leave the road **UKOP12: pages 32 – 39**.

(e) On 13 July 2023, Just Stop Oil supporters marched around parts of the capital, including the City of London, Lambeth, Westminster and Hyde Park Corner. Police issued section 12 notices at Great Smithfield Street and Hyde Park Corner. On the same date, five supporters were arrested in Stockwell for breach of a section 12 notice. A group of Just Stop Oil protesters also marched through Selfridges in London wearing hi-vis vests and carrying placards reading "*Dads against doom, no new oil"* and "*Will our children survive 3,5°?"* as part of a "Dads March". Six of the protesters were arrested **UKOP12: pages 36 – 48**.

(f) On 14 July 2023, groups marched near Baker Street station. A section 12 notice was issued on the main march on Marylebone Road. Around 30 Just Stop Oil supporters also entered a John Lewis department store and held up Just Stop Oil banners **UKOP12: pages 49 – 52**.

(g) On 17 July 2023, Just Stop Oil staged their biggest day of slow marches, with more than 200 protesters blocking traffic in at least 14 locations across London during rush hour. They carried placards reading "*new oil = murder"* and *"can't eat oil*". Locations included Bermondsey, Victoria, Bishopsgate, Liverpool Street, Whitehall, Lambeth Bridge, Wandsworth Bridge and Islington. Police issued section 12 notices, removed 183 protesters and made at least 21 arrests **UKOP12: pages 53 – 60**.

(h) On 19 July 2023, 160 Just Stop Oil supporters marched on key London roads, causing disruption in Victoria, Vauxhall, Charing Cross, Marylebone, Holborn and Westminster. Protesters later marched around Parliament Square. Police subsequently issued section 12 notices and arrested 35 people **UKOP12: pages 61 – 63**.

(i) On 20 July 2023, 132 Just Stop Oil supporters marched in nine groups around West, East and South London **UKOP12: pages 64 – 66**.

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(j) On 1 August 2023, Just Stop Oil protesters marched through the centre of Cambridge holding signs reading "*100 crimes against humanity*" and "*no new oil*", reportedly in protest against the UK government's recent licensing of 100 new oil and gas fields in the North Sea **UKOP12: pages 67 – 69**.

(k) On 18 August 2023, 20 Just Stop Oil activists slow-marched through the streets of Wells in Somerset **UKOP12: pages 70 – 72**.

(l) On 19 August 2023, around 30 Just Stop Oil protesters slow-marched in Exeter city centre. Police ordered the marchers off the road by issuing a section 12 notice. Protesters then continued marching through the Princesshay shopping centre **UKOP12: pages 73 – 76**.

(m) On 26 August 2023, Just Stop Oil activists held a slow walk demonstration in Leeds, which started in the city centre before moving to a dual carriage way which blocked access to parts of the M621 **UKOP12: pages 77 – 82**.

(n) On 9 September 2023, Just Stop Oil protesters slow-marched in Portsmouth city centre which was reported to be in response to the UK government's refusal to *"stop licensing all new oil, gas and coal projects"* **UKOP12: pages 83 – 87**.

18. On 14 July 2023, it was reported that Just Stop Oil protesters had stormed the stage on the first night of the BBC Proms at the Royal Albert Hall, unfurling banners and allegedly setting off confetti cannons and sounding air horns before being forcibly removed. Just Stop Oil said this was "*in response to the BBC's underwhelming coverage of the climate emergency…as well as uncritically regurgitating government and oil company propaganda"* **UKOP12: pages 88 – 94**.

19. Later on the same date (14 July 2023), it was reported that three activists had run onto Channel 4's The Last Leg talk show in Just Stop Oil t-shirts and handed high vis orange vests to guests whilst it was being broadcast live, before being led off stage by staff **UKOP12: pages 91 – 94**.

20. On 17 July 2023, a Just Stop Oil activist, who was reported as being part of the disruption at the World Snooker Championship referred to at paragraph 21 of my Fourth Witness Statement, was arrested and charged with two counts of criminal damage and breaching bail conditions after he used a fire extinguisher to spray-paint a courtyard of Exeter University following his graduation ceremony **UKOP12: pages 95 – 103.**

21. On 19 July 2023, it was reported that protesters had sprayed orange paint onto the building of the Department for Energy Security and Net Zero. Just Stop Oil tweeted on this day at 8:10am attributing the action to the Department having issued more than 100 new oil and gas licences **UKOP12: pages 104 – 109**.

22. On 20 July 2023, it was reported that two Just Stop Oil supporters had thrown 5 litres of orange paint at the headquarters of the think tank Policy Exchange (which it was reported had been funded by ExxonMobil) before daubing the building with their hands. One of the supporters confirmed "*We have painted the Policy Exchange because they have been instrumental in implementing laws to restrict climate protesters"*. Just Stop Oil tweeted on 5 August 2023 at 09:18 *"And that's why you get your offices painted: for taking fossil fuel money to lobby for genocidal policies"* **UKOP12: pages 110 – 116**.

23. On 21 July 2023, it was reported that protesters had attempted to disrupt the golf Open Championship at Royal Liverpool by setting off an orange flare. The protesters were escorted away by the police. The police later confirmed that four people had been arrested in connection with the incident **UKOP12: pages 117 – 126**.

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24. On 13 August 2023, it was reported that campaigners from Money Rebellion, which I understand to be an arm of Extinction Rebellion, had set off flares and held banners reading "*AIG is a climate criminal*" and "*AIG stop insuring climate crisis"* at the AIG Women's Open in Tadworth. Five people were arrested for aggravated trespass. It was reported that the campaigners were protesting AIG's insuring of major fossil fuel projects. Five people were arrested for aggravated trespass **UKOP12: pages 127 – 135**.

25. On 2 September 2023, it was reported that Extinction Rebellion activists had protested outside the London headquarters of Perenco, demanding that the oil and gas company does not expand further in the Democratic Republic of Congo and Colombia **UKOP12: pages 136 – 137.**

26. On 18 September 2023, it was reported that Extinction Rebellion activists had scaled the building of the Labour Party headquarters, poured fake oil over the premises and let off smoke cannons. Protesters standing on the canopy of the building held banners stating *"Labour: cut the ties to fossil fuels"*. A press release by Extinction rebellion stated that they are demanding that*, "if Labour wins the next general election, it must do more than stop issuing new oil licences and cancel any licences granted"* **UKOP12: pages 138 – 145.**

STATEMENTS FROM EXTINCTION REBELLION AND JUST STOP OIL

27. The recent action taken by Extinction Rebellion, as referred to above, indicates that the targeting of companies and organisations affiliated to the oil and gas industry is continuing. This is notwithstanding the public statement made in January 2023, referred to at paragraphs 45 and 46 of my Third Witness Statement, that indicated there would be a temporary shift away from public disruption.

28. At paragraph 38 of my Fourth Witness Statement, I referred to Extinction Rebellion's focus on mobilising new members to their campaign and that following "*The Big One*" event which took place between 21 – 24 April 2023, Extinction Rebellion would be "*translating the appetite for action…into a whole range of campaigns"*. Extinction Rebellion appears to be now encouraging supporters to take action: statements on their website read "*We can't wait another 4 years or 4 days. The time is now. Choose your future: 1. Picket | 2. Organise Locally | 3. Disobey"* and *"Civil disobedience works"* **UKOP12: pages 146 – 148**.

29. Extinction Rebellion released a press release after targeting the Labour Party headquarters, which I refer to at paragraph 26 above, stating that this activity is *"part of a series of 'Cut the Ties' actions which launched in November 2022. The campaign targets a web of organisations which are propping up the fossil fuel economy. So far there have been 30 actions at 24 sites"* **UKOP12: pages 143 – 145.**

30. Furthermore, a statement posted on Extinction Rebellion's website dated 11 August 2023 titled "*Update to the movement, summer 2023*" indicates that since "*The Big One*" in Westminster *"we've forged alliances and friendships with other movements, organisations and groups, and are looking to build more connections with our community assemblies throughout the UK"* **UKOP12: pages 149 – 152**, suggesting that the group may be joining forces with other campaign groups, which may include Just Stop Oil.

31. In relation to Just Stop Oil, as outlined above at paragraph 17, Just Stop Oil are continuing to engage in a sustained campaign of slow marches across central London, as well as disrupting public and high-profile events as outlined at paragraphs 18 to 26. A spokesperson for Just Stop Oil stated on 9 July 2023 that they will continue protesting until the Government makes a "*meaningful statement"* to halt any new licenses or consent for fossil fuel exploration in the UK: "*The protests will continue, I can guarantee they will continue until the Government makes that statement"* **UKOP12: pages 153 – 156**.

32. A press release by Just Stop Oil on 19 August 2023 also stated that "*Civil resistance is no longer an option, it is a necessity"* **UKOP12: pages 73 - 76**, suggesting that Just Stop Oil remain committed to a campaign of public disruption. Indeed, Just Stop Oil recently indicated they intend to cause disruption at future Premier League games, stating "*The Prem's our Holy Grail. We're going to go for it*" and "*We're looking to mobilise properly so we can target one match every weekend this season. We'll be travelling all over the country*" **UKOP12: pages 157 – 160**.

33. Just Stop Oil also appear to be continuing to actively recruit members of the public to join their protests (including the slow marches). Their press releases on 6 July 2023, 10 July 2023 and 17 July 2023 relating to the slow marches referred to at paragraph 17 above state *"Time's up for new oil, gas and coal. It's time everyone got on the streets, marching every day to demand change"* **UKOP12: pages 18 – 21, 25 - 28 and 57 - 60**. Press releases on 19 July and 20 July 2023 by Just Stop Oil also stated *"It's time to get off the sidelines and join in civil resistance to end new oil, gas and coal"* **UKOP12: pages 61 – 66**.

34. In an open letter to the UK Police Unions dated 13 September 2023, Just Stop Oil stated that they would be *"back on the streets of London from October 29th".* The letter also states that *"our 13 week campaign between April and July this year cost the Metropolitan Police more than £7.7m and required the equivalent of an extra 23,500 officer shifts."* **UKOP12: pages 161 – 165.**

35. In addition, Just Stop Oil also appear to be launching a new campaign referred to as an "*autumn of disruption at universities*" throughout October 2023 as part of a plan to target higher education facilities. Reportedly, targets will include Imperial College London and London Metropolitan University, both of which, it has been reported, have been accused of failing to stop fossil fuel investments **UKOP12: pages 166 – 177**. On 18 September 2023, the student wing of Just Stop Oil published an open letter to all university Vice Chancellors in the UK, demanding that they sign and return an "*ultimatum letter*" otherwise *"students will have no choice but to bring a wave of civil disobedience to their campuses"* **UKOP12: pages 178 – 179.**

36. The combined impact of this suggests that the fossil fuel industry (and any organisations affiliated with that industry) remains the target of Just Stop Oil's campaign and that Just Stop Oil are intending to continue their campaign, involving as many members as possible, without any discernible end date.

37. The materials that have been published on Just Stop Oil's and Extinction Rebellion's websites, as well as on the groups' respective social media channels, continue to indicate that oil and gas companies will remain a target of their campaign. Consequently, there remains a risk to the Claimants' sites against which an order in the terms sought would protect.

OTHER INJUNCTION PROCEEDINGS

38. I confirm there are no updates to my knowledge in relation to:

    (a) the injunctions granted to oil and gas companies in relation to protests against the industry, as set out at paragraph 45 of my Fourth Witness Statement, save for I have become aware of the following injunctions granted in the judgment of the Honourable Justice Linden dated 18 July 2023 and the judgment of Mr Justice Julian Knowles dated 31 August 2023 respectively:

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Claim Number	Property	Claimant(s)	Duration of injunction
QB-2022-001098	Fawley Petrochemical Complex, Hythe Terminal, Avonmouth Terminal, Birmingham Terminal, Purfleet Terminal, West London Terminal, Hartland Park Logistics Hub and Alton compound at Holybourne	Esso Petroleum Company Limited and Exxonmobil Chemical Limited	Final injunction granted
QB-2022-002477	Southampton to London Oil Pipeline Project	Esso Petroleum Company Limited	Injunction granted until 31 December 2023

(b) the injunctions obtained by parties against persons unknown including those affiliated or connected to the Extinction Rebellion, Just Stop Oil and/or Insulate Britain campaigns set out at paragraph 46 of my Fourth Witness Statement.

SUMMARY

39. The evidence set out above, as well as that in my Previous Witness Statements, confirms that there continues to be frequent and significant direct action undertaken by Just Stop Oil and Extinction Rebellion, and which continues to target those affiliated with the oil and gas industry. There is also no clear end date to the action and both organisations would appear to be focused on mobilising their supporters and recruiting new members to their campaigns.

40. As referred to at paragraph 55 of my Third Witness Statement and paragraph 48 of my Fourth Witness Statement, given the importance of the Sites covered by the Order, Just Stop Oil and Extinction Rebellion's continuing campaigns, and the highly disruptive and inherently dangerous effect of their protesting techniques, means that I continue to believe that, in the absence of further final injunctive relief being granted in the terms sought, there is a real risk of imminent trespass on the Sites and / or interference with the private access routes in relation to both Sites. I do not believe that this risk is likely to abate in the near or medium future. Consequently, 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 by continuing the deterrent effect of the relief granted by the Order that appears to have been so successful to date.

41. I refer above at paragraph 14 and at paragraphs 56 to 58 of my Third Witness Statement and paragraphs 12 and 49 of my Fourth Witness Statement to the fact that the Claimants currently enjoy the benefit of the double protection afforded by the injunction granted by NWBC Order, which remains in place following the 2023 NWBC Order. However, as mentioned at paragraph 14 above, the 2023 NWBC Order is subject to a final trial which is yet to be listed. It therefore remains the case that, as well as that injunction protecting different interests and being based on a different cause of action, the Claimants cannot rely on the protection afforded by the 2023 NWBC Order continuing. This therefore continues to make it critical that the injunctive protection sought by the Claimants continues.

PROCEEDINGS

42. Paragraph 16 of the Order made in these proceedings dated 9 April 2022 of Mr Peter Knox KC sitting as a Deputy Judge ("**8 April Order**") provided that "*Pursuant to CPR 6.15(4), the period for service of any acknowledgement of service, admission or defence shall be 56 days*."

43. The Claimants' solicitors have confirmed to me that no acknowledgement of service, admission or defence has been received on behalf of any Defendant to these proceedings, pursuant to paragraph 16 of the 8 April Order, or at all. The Claimants' solicitors have also confirmed to me that no Defendant has ever engaged with these proceedings.

For the reasons set out in this statement and the Previous Witness Statements, I respectfully request that the Court grants a final injunction on the terms 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: DocuSigned by: 7FAFE9820F7D47D... Dated: 22 September 2023

John Michael Armstrong

Party: Claimants
Witness: Antony Douglas Phillips
Number: Second
Exhibit: UKOP13
Dated: 23 November 2023

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 LONDN 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 ATTACHED SITE 2 PLAN)

First Defendants / Respondents

(2) PERSONS UNKNOWN WITHOUT CONSENT AND IN CONNECTION WITH OR AFFILIATED TO THE EXCTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN OBSTRUCTING OR 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 ATTAHCED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE (SHOWN FOR IDENTIFICATION SHADED BLUE ON THE ATTACHED SITE 2 PLAN)

Second Defendants / Respondents

SECOND WITNESS STATEMENT OF

ANTONY DOUGLAS PHILLIPS

I, **Antony Douglas Phillips**, 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 "**UKOP13".** 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 Simon Gleeson dated 6 October 2023 (the "**Order**").

SERVICE OF APPLICATION

5. I make this witness statement in order to evidence the Claimants' compliance with paragraph 6 of the Order in serving the Order on the Defendants.

Compliance with paragraph 6(a) of the Order

6. At 12:02pm on 13 October 2023, Jody Sanders of Fieldfisher, the Claimants' solicitors, uploaded the Order to https://ukop.azurewebsites.net, being the web link stated in the Order.

7. A screenshot of the web link page hosting the Order (and all previous documents that have been served in these proceedings) appears at **UKOP13:3**.

Compliance with paragraph 6(b) of the Order – Site 1

8. On the instructions of the Claimant's solicitors, at approximately 14:00pm on 19 October 2023, Roger Reese, being an employee of British Pipeline Agency Limited, the agent of the First Claimant, effected service of the Order together with a notice which stated that copies of the Order may be obtained from the Claimants' solicitors, Fieldfisher LLP whose address is Riverbank House, 2 Swan Lane, London, EC4R 3TT (tel: 020 7861 4000; email: UKOPinjunction@fieldfisher.com), and may be viewed at https://ukop.azurewebsites.net, by placing copies of the Order in, and affixing said notice to, clear transparent sealed containers at two prominent locations on the perimeter of Site 1, as shown in the photographs at **UKOP13:4-7**.

Compliance with paragraph 6(b) of the Order – Site 2

9. On the instructions of the Claimant's solicitors, between approximately 10:00am and 11:30am on 20 October 2023, Darren Gilligan and Jake Sale, being employees of British Pipeline Agency Limited, the agent of the First Claimant, effected service of the Order together with a notice which stated that copies of the Order may be obtained from the Claimants' solicitors, Fieldfisher LLP whose address is Riverbank House, 2 Swan Lane, London, EC4R 3TT (tel: 020 7861 4000; email: UKOPinjunction@fieldfisher.com), and may be viewed at https://ukop.azurewebsites.net, by placing copies of the Order in, and affixing said notice to, clear transparent sealed containers at two prominent locations on the perimeter of Site 2, as shown on in the photographs at **UKOP13:8-12**.

Compliance with paragraph 6(c) of the Order

10. On the instructions of the Claimant's solicitors, between approximately 9:00am and 16:00pm on 19 October 2023 and between approximately 9.00am and 16:00pm on 24 October 2023, Roger Reese, being an employee of British Pipeline Agency Limited, the agent of the First Claimant, effected service of the site injunction notice in respect of Site 1 by affixing copies of the Site 1 Notice in not less than A2 size in clearly visible locations (including at entranceways, access points, gates and attached to perimeter fencing) around and comprising part of Site 1, as more particularly shown in the photographs at **UKOP13:13-62** and the map showing the location of Site 1 Notices at **UKOP13:63**; and

11. On the instructions of the Claimant's solicitors, between approximately 8:00am and 16:00pm on 19 October 2023, Darren Gilligan and Jake Sale, being employees of British Pipeline Agency Limited, the agent of the First Claimant, effected service of the site injunction notice in respect of Site 2 by affixing copies of the Site 2 Notice in not less than A2 size in clearly visible locations (including at entranceways, access points, gates and attached to perimeter fencing) around and comprising part of Site 2, as more particularly shown in the photographs at **UKOP13:64-113** and the maps showing the location of Site 2 Notices **UKOP13:114-115**.

Compliance with paragraph 6(d) of the Order

12. At 16:30pm on 16 October 2023, an email was sent by Amanda McLanaghan of Fieldfisher on my behalf to xr-legal@riseup.net (**UKOP13:116-125**).and at 16:32pm on the same day, an email was sent by Amanda McLanaghan of Fieldfisher on my behalf to juststopoilpress@protonmail.com, info@juststopoil.org, and juststopoil@protonmail.com (**UKOP13:126-135**) confirming that:

    (a) the Claimants' application for summary judgment under Part 24 of the Civil Procedure Rules seeking an order from the Court for a final injunction in the claim and an order for related directions was considered at the hearing on 6 October 2023 before Mr Simon Gleeson sitting as a Judge of the Chancery Division (the **"Hearing"**);

    (b) at the Hearing, the Court granted a further order in favour of the Claimants which grants final injunctive relief and orders related directions; and

    (c) copies of the Order can be viewed at the following weblink: https://ukop.azurewebsites.net.

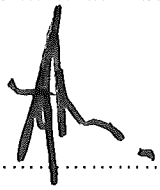
13. Copies of the delivery receipts for these emails can be found at **UKOP13:136-137**.

14. At 16:31pm on 16 October 2023, an automatically generated response was received from xr-legal@riseup.net with the subject line "Autoreply for XR Legal Support" and which confirmed that the XR Legal Support Team had received Fieldfisher's email referred to at paragraph 12 above and was *"working on getting a response to you ASAP!"*. A copy of this email can be found at **UKOP13:138**.

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: 23 November 2023

Antony Douglas Phillips

Docusign Envelope ID: A2AE09B9-1E15-4CB0-9537-8933DDD18EC3

Party: Claimant
Witness: John Michael Armstrong
Number: Sixth
Exhibit: UKOP14
Dated: 4 November 2024

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 / 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

SIXTH 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 1,000km of fuel pipes in the UK.

3. BPA acts as agent for the First Claimant United Kingdom Oil Pipelines Limited ("**UKOP**") and the Second Claimant West London Pipeline and Storage Limited ("**WLPSL**"), and it operates and maintains their UK based assets.

4. I am duly authorised to make this witness statement on behalf of the Claimants.

5. 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.

6. Produced and shown to me is a bundle of documents containing exhibit "**UKOP14**". Unless otherwise stated, page references in this witness statement refer to pages in that exhibit.

7. Unless otherwise stated, in this statement I adopt the definitions set out in my first witness statement dated 7 April 2022.

CURRENT POSITION

8. On 12 April 2022 Peter Knox QC (sitting as a Judge of the Chancery Division) granted an interim injunction to restrain the Defendants from trespassing, causing damage or removing equipment from the Sites and / or obstructing or otherwise interfering with the First Claimant's access over private access roads at the Sites (the "**Injunction**"). On 21 April 2022, the Injunction was extended until 20 April 2023 (together, the "**April 2022 Orders**").

9. On 21 April 2023, the Injunction was extended by order of The Honourable Mr Justice Rajah until 20 October 2023, final determination of the claim or further claim in the interim (the "**April 2023 Order"**). On 6 October 2023, Mr Simon Gleeson (sitting as a Judge of the Chancery Division) granted an order for final injunctive relief (the "**Order**").

10. I make this further statement in connection with the annual review hearing of the final injunction granted by the Order.

11. For the reasons I refer to below, the Claimants consider that the Order should remain in place until 23:59 hrs on 20 October 2028, subject to the annual reviews provided for at paragraph 12 of the Order.

12. This sixth witness statement supplements:

    (a) my first witness statement dated 7 April 2022 ("**First Witness Statement**");

    (b) my second witness statement dated 14 April 2022 ("**Second Witness Statement**");

    (c) my third witness statement dated 5 April 2023 ("**Third Witness Statement**");

    (d) my fourth witness statement dated 6 July 2023 ("**Fourth Witness Statement**"); and

(e) my fifth witness statement dated 22 September 2023 ("**Fifth Witness Statement**")

together my **"Previous Witness Statements"**.

13. The purpose of this sixth witness statement is to provide the Court with an update in respect of relevant events following the grant of the Order and since my Fifth Witness Statement and, ultimately, demonstrate the continuing threat posed by the Defendants. It therefore addresses:

(a) evidence of direct action which has occurred in the vicinity of Site 1 and Site 2;

(b) evidence of direct action targeted at other operators; and

(c) evidence of direct action by Just Stop Oil and Extinction Rebellion, including where such action has targeted other organisations affiliated with the oil and gas sector.

14. I also address, at paragraphs 65 to 74 of this statement, the application made by the Claimants on 4 November 2024 to vary the service requirements in the Order (the **"Application"**) and the basis upon which that Application has been made.

DIRECT ACTION IN THE VICINITY OF SITE 1 AND SITE 2

15. In my First Witness Statement and Second Witness Statement, I addressed in detail the direct action suffered by the Claimants in respect of Site 1 and the direct action targeted at the operations of the Claimants in close proximity to Site 1 and Site 2. This direct action formed the basis for the Claimants seeking an initial interim order for pre-emptive injunctive relief.

16. In my Third Witness Statement, I addressed the further incidents of direct action in close proximity to Site 2 since the April 2022 Orders.

17. There has been no further direct action at, or in the vicinity of, Site 1 and Site 2 since the date of my Third Witness Statement. However, I refer to paragraph 20 of my Third Witness Statement and paragraph 12 of my Fourth Witness Statement which set out a number of factors which I believe contributed to the reduction in direct action, including:

(a) the service of the April 2022 Orders, the April 2023 Order and subsequently the Order at the Sites and by email to the campaign groups Extinction Rebellion and Just Stop Oil;

(b) the Orders providing a deterrent effect. For example, on 13 September 2023, Just Stop Oil tweeted in relation to Just Stop Oil led protests in Portsmouth involving road blockades:

> *"Disruption is frustrating, but we have no other choice. Fossil fuel companies have taken out private injunctions that make protests impossible at oil refineries, oil depots and even petrol stations"* **UKOP14: page 8**; and

(c) The existence of a final injunction order dated 26 January 2024 in favour of Valero Energy, Valero Logistics UK Limited and Valero Pembrokeshire Oil Terminal Limited (together, **"Valero"**) made by Mr Justice Ritchie following a hearing on 17 January 2024 (the **"Valero Order"**) which grants a final five year injunction until 13 December 2028 subject to annual reviews. The Order protects a number of Valero's sites including land interest at Kingsbury Oil Terminal (of which Site 2 forms part). A copy of the Valero Order can be found at **UKOP14: pages 9-29.**

I continue to believe that, if any of these factors were to be removed, the direct action would escalate.

18. One of the factors mentioned at paragraph 12(d) of my Fourth Witness Statement and subsequently at paragraph 14 of my Fifth Witness Statement is the continuing existence of an injunction order made by Mr Justice Sweeting in the King's Bench Division dated 9 May 2022 in favour of the North Warwickshire Borough Council (**"NWBC"**) and which protects the locality of the Kingsbury Oil Terminal (of which Site 2 forms part) (the **"NWBC Order"**) **UKOP6: pages 125-131**. Since my Fifth Witness Statement, a final trial of NWBC's claim was heard at a hearing on 6 September 2024 and a final injunction was granted until 6 September 2027, subject to annual reviews. A copy of the order is at **UKOP14: pages 30-44**.

19. I still consider that the deterrent effect provided by the Order continues to assist the Claimants in ensuring that they can conduct their operations at the Sites without risk of the significant practical, financial and logistical implications for the Claimants, for many other third parties and potentially for the UK economy, being implications that would otherwise arise from direct action. In addition, there are also the substantial health and safety risks that arise from direct action to which I refer in paragraphs 20 to 42 of my First Witness Statement.

EVIDENCE OF DIRECT ACTION BY JUST STOP OIL AND EXTINCTION REBELLION, INCLUDING TARGETING OF OTHER OPERATORS AND AFFILIATED ORGANISATIONS FROM 22 SEPTEMBER 2023 TO 4 NOVEMBER 2024

20. Since the date of my Fifth Witness Statement, there continues to be activity targeted at industries and organisations that members of Extinction Rebellion and / or Just Stop Oil consider to be affiliated to the oil and gas industries.

21. Paragraph 16 of my Fourth Witness Statement referred to the announcement by Just Stop Oil on 24 April 2023 of a new campaign involving disruption across central London by marching slowly on major roads as part of an "*indefinite campaign of civil resistance to demand an end to new UK oil and gas projects*" **UKOP9: pages 9-10**. Paragraph 17 of my Fourth Witness statement detailed the slow marches carried out between 5 April 2024 and 6 July 2023 and paragraph 17 of my Fifth Witness Statement detailed additional slow marches carried out between 6 July 2023 and 22 September 2023. Further examples of the slow marches that have been reported as having been carried out since 22 September 2023, both in London and across England, include the following:

    (a) On 23 September 2023, around 50 Just Stop Oil supporters took part in slow marches along roads in Bristol city centre and blocked traffic to demand that the UK government stop all new oil and gas projects **UKOP14: pages 45-49**;

    (b) On 30 October 2023, 62 Just Stop Oil supporters were arrested by the Metropolitan Police after carrying out a slow march in Whitehall **UKOP14: pages 50-54**;

    (c) On 1 November 2023, around 45 Just Stop Oil supporters marched on Cromwell Road in West London, approximately 40 of which were arrested under Section 7 of the Public Order Act 2023 (the "**Public Order Act**") **UKOP14: pages 55-57**. I understand that Section 7 applies where an offence is committed by an act or an intention to do an act that interferes with the use or operation of key national infrastructure;

    (d) On 3 November 2023, around 12 Just Stop Oil supporters carried out a march in East London bringing traffic to a halt and 12 supporters were arrested for allegedly breaching Section 7 of the Public Order Act **UKOP14: pages 58-59.** The Metropolitan Police tweeted on X (formerly known as twitter) on this date at 4:58pm that 112 people had been arrested in the week leading up to this march **UKOP14: page 60**;

    (e) On 6 November 2023, a group of 130 Just Stop Oil supporters were involved in a march in Whitehall towards Parliament Square and it was reported that dozens of protestors were arrested after bringing traffic near Downing Street to a halt. It was subsequently

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reported on 1 October 2024 that three Just Stop Oil supporters were found guilty of wilfully obstructing a highway in relation to this incident after a trial at Stratford Magistrates' Court **UKOP14: pages 61-74**;

(f) On 8 November 2023, more than 40 arrests were made after Just Stop Oil supporters failed to move out of the road on Waterloo Bridge and slow marched towards The Strand. The Metropolitan Police were reported as saying that the march caused traffic to be held up on the bridge, including an ambulance with *"blue lights on"* **UKOP14: pages 75-79**;

(g) On 12 November 2023, 40 Just Stop Oil supporters blocked traffic on a dual carriageway near Finsbury Park and at least 25 arrests were made **UKOP14: pages 80-88**;

(h) On 13 November 2023, 40 Just Stop Oil supporters marched on a North London Road. On 15 December 2023, it was reported that one of the supporters was given a seven month prison sentence after pleading guilty to breaching section 7 of the Public Order Act **UKOP14: pages 89-90**;

(i) On 17 November 2023, around 20 Just Stop Oil supporters were arrested whilst marching from Trafalgar Square towards Parliament Square **UKOP14: pages 91-93**;

(j) On 24 November, 5 Just Stop Oil supporters were arrested whilst marching from Trafalgar Square to Parliament Square **UKOP14: pages 94-96**; and

(k) On 1 December 2023, 7 Just Stop Oil supporters were arrested whilst marching from Trafalgar Square to Parliament Square **UKOP14: pages 97-99**.

22. On 9 October 2023, it was reported that a Just Stop Oil supporter was arrested for spray painting one of Bristol University's buildings in orange paint. The individual claimed that this was "*"to call for an immediate end to all new oil and gas"* **UKOP14: pages 100-106.**

23. On 11 October 2023, it was reported that dozens of Extinction Rebellion supporters staged a "*die-in*" to block the main doors of Havas, a media agency, by lying on the floor, covered in white sheets. It was reported that Havas were targeted because of an alleged link to a fossil fuel company **UKOP14: pages 107-110**.

24. On 17 October 2023, it was reported that Extinction Rebellion supporters had blocked an oil and gas summit, Energy Intelligence Forum, at InterContinental Park Lane hotel in London by gluing themselves to the road outside and the hotel's revolving doors **UKOP14: pages 111-113**.

25. On 18 October 2023, it was reported that hundreds of Extinction Rebellion supporters occupied the City of London offices of ten Lloyd's of London insurers demanding they rule out insuring coal and oil related projects and held up signs stating *"Don't insure fossil fuels"* **UKOP14: pages 114-119**.

26. On 6 November 2023, it was reported that two Just Stop Oil supporters were arrested after smashing the glass covering a painting, The Toilet of Venus (The Rokeby Venus) by Diego Velázquez, with hammers at the National Gallery. Following the incident, Just Stop Oil stated *"it is time for deeds not words. It is time to Just Stop Oil…New oil and gas will kill millions "* **UKOP14: pages 120-125**.

27. On 27 November 2023, it was reported that supporters of Money Rebellion (which is a sister organisation of Extinction Rebellion) superglued shut the doors of almost 50 Barclays Bank's branches in city centres across the country. Posters affixed to the doors stated *"$190 billion in finance for fossil fuels since 2015"* and the press release by Extinction Rebellion following the

incident stated that the group was demanding the bank *"commits to end the funding of fossil fuel projects and companies expanding fossil fuel extraction"* **UKOP14: pages 126-128**.

28. On 29 November 2023, it was reported that 18 Just Stop Oil supporters gathered outside Rishi Sunak's home in Kensington beating pots and pans and demanded that the UK halts future licences and consents for fossil fuels. All supporters were detained under Section 50 of the Police Reform Act 2002, which I understand relates to persons engaging in anti-social behaviour, and 16 of the supporters were taken into custody **UKOP14: pages 129-134**.

29. On 1 February 2024, it was reported that supporters of Extinction Rebellion targeted a panel debate organised by the Science Museum, causing the debate to end. One of the protesters held up a banner reading *"2024 – more droughts, floods and deaths fuelled by Science Museum oil & coal sponsors"* **UKOP14: pages 135-138**.

30. On 27 February 2024, it was reported that Extinction Rebellion supporters had stormed London's 'Walkie Talkie' building on Fenchurch Street and occupied the offices of five major insurers. The supporters stated they were staging an "*indefinite occupation*" and demanded that the companies talk to them about "*insuring climate-wrecking oil and gas*" **UKOP14: pages 139-144**.

31. On 29 February 2024, it was reported that Extinction Rebellion supporters had entered the London headquarters of advertising and media agency McCann Worldgroup to "*protest against the company's reported bid for another stint as top greenwasher for fossil fuel giants Saudi Aramco*" **UKOP14: pages 145-148**. On the same date, it was reported that supporters of Extinction Rebellion had protested outside the offices of AXA UK's headquarters in London, to demand that the company stop insuring new fossil fuel projects **UKOP14: pages 149-150**.

32. On 1 March 2024, it was reported that Just Stop Oil and Extinction Rebellion supporters occupied an office building in Birmingham where insurers Allianz, Chubb and Zurich have offices in order to demand that they stop insuring new and expanded coal, oil, and gas projects and the companies developing them. It was reported that three supporters were arrested **UKOP14: pages 151-152**.

33. On 2 March 2024, it was reported that Extinction Rebellion supporters had broken into a chemicals plant near Lyon in south-eastern France to protest against the alleged discharge of non-biodegradable PFAS substances. It was reported that the supporters wrote *"murderers"* in red paint on the walls and broke doors and materials in the plant. It was also reported that eight people were arrested **UKOP14: page 153**.

34. On 4 March 2024, it was reported that Extinction Rebellion supporters occupied the office of Tokio Marine, an insurance company, for 30 hours to demand that they stop insuring all new oil, gas and coal projects **UKOP14: pages 154-158**.

35. On 10 March 2024 at 11:24am, Just Stop Oil announced on X (formerly known as Twitter) that *"Just Stop Oil will Take Action at Airports"* **UKOP14: page 159**. As a result of this announcement, the major London and regional airports obtained injunctions against persons connected with the Just Stop Oil campaign and / or its connected organisations, which injunctions are outlined at paragraph 59 below. Examples of the actions subsequently taken by Just Stop Oil supporters at airport facilities are as follows:

    (a) On 20 June 2024, it was reported two Just Stop Oil supporters entered a private airfield in Stansted Airport and sprayed orange paint over jets, causing at least £52,000 of damage. Two individuals were arrested by Essex police. A spokesperson for Just Stop Oil on the same day confirmed that *"Just Stop Oil is demanding that our next government sign up to a legally binding treaty to phase out fossil fuels by 2030"* **UKOP14: pages 160-168**.

(b) On 24 July 2024, it was reported that ten Just Stop Oil supporters were arrested at Heathrow Airport on suspicion of conspiring to interfere with a site of key national infrastructure under the Public Order Act **UKOP14: pages 169-173**.

(c) On 29 July 2024, it was reported that eight Just Stop Oil supporters were arrested by Sussex Police on suspicion of interfering with public infrastructure at Gatwick airport after blocking an entrance to a security gate **UKOP14: pages 174-179**.

(d) On 30 July 2024, it was reported that two Just Stop Oil protesters were arrested on suspicion of criminal damage after spraying orange paint in Terminal 5 at Heathrow Airport and it was reported on 31 July 2024 that they were subsequently remanded in jail following a hearing at Westminster Magistrates Court **UKOP14: pages 180-190**.

(e) On 1 August 2024, it was reported that six Just Stop Oil supporters blocked access to the departure gates of Heathrow Terminal 5 holding up signs saying *"Oil Kills"*. Seven supporters were arrested on suspicion of public order offences **UKOP14: pages 191-198**.

(f) On 5 August 2024, it was reported that four Just Stop Oil supporters, who police said planned to cause *"significant disruption"* at Manchester Airport, were arrested on suspicion of conspiring to cause a public nuisance. According to a Just Stop Oil press statement on 6 August 2024, the supporters in question were subsequently remanded to prison **UKOP14: pages 199-203**.

36. On 26 April 2024, it was reported that two Just Stop Oil supporters were arrested for covering a Member of Parliament's office in Cumbria with posters reading *"Stop Tory Coal"* **UKOP14: pages 204-209**.

37. On 2 May 2024, it was reported that Extinction Rebellion and Just Stop Oil supporters targeted multiple insurance offices in Manchester whilst demanding that the insurers refuse to underwrite any new fossil projects and infrastructure **UKOP14: pages 210-211**.

38. On 10 May 2024, it was reported that two Just Stop Oil supporters smashed the glass case covering the Magna Carta at the British Library. The individuals were taken into custody on suspicion of causing criminal damage and were later charged **UKOP14: pages 212-220**.

39. On 3 June 2024, it was reported that Extinction Rebellion supporters had blocked access to Farnborough Airport by barricading one of the gates and four protesters locked-on to oil drums to protest against the expansion of the airport, holding signs including *"Fewer flights not more"* **UKOP14: pages 221-223**.

40. On 7 June 2024, it was reported that Just Stop Oil supporters disrupted the wedding of the Duke of Westminster by letting off orange powder from fire extinguishers as the wedding party left the church. In a statement following the protest, Just Stop Oil stated " *there is no future unless we come together to stop oil and gas"* **UKOP14: pages 224-230**.

41. On 19 June 2024, it was reported that two Just Stop Oil supporters sprayed Stonehenge with orange powder paint and that they were arrested on suspicion of damaging the monument **UKOP14: pages 231-234**. A press release by Just Stop Oil following the incident attributed this to *"Just Stop Oil is demanding that our government sign up to a legal binding treaty to phase out fossil fuels by 2030"* **UKOP14: pages 235-237**.

42. On 9 July 2024, it was reported that Extinction Rebellion supporters had scaled the roof of East Sussex Country Hall to demand that East Sussex Council stops investing its pensions in fossil fuels. Supporters held up signs saying *"Cut your ties with Big Oil"* **UKOP14: pages 238-241**.

43. On 10 July 2024, it was reported that Just Stop Oil supporters poured powder paint at three intersections leading into Parliament Square **UKOP14: pages 242-249**.

44. On 27 September 2024, it was reported that three Just Stop Oil supporters had thrown soup over two Vincent van Gogh paintings at the National Gallery and that the Metropolitan Police held all three on suspicion of causing criminal damage. This incident followed two Just Stop Oil protesters being jailed for two years and twenty months respectively for targeting one of the same works in October 2022, as outlined at paragraph 31(c) of my Third Witness Statement **UKOP14: pages 250-251**. On 18 October 2024, it was reported that three Just Stop Oil supporters unfurled a large banner in front of the same Vincent van Gough paintings at the National Gallery stating *"For Health's Sake Just Stop Oil"*. The three supporters were escorted from the gallery by security guards **UKOP14: pages 252-253**.

45. On 28 October 2024, it was reported that Extinction Rebellion supporters occupied the lobby of the Walkie Talkie building, which contains the offices of insurers Ascot, Talbot, Chaucer, Markel, Allied World, CNA Hardy, Tokio Marine Kiln, Sirius International and Lancashire Syndicates and 60 Gracechurch Street, where the insurer Allianz has an office. It was also reported that the supporters delivered ultimatum letters to the insurance companies *"warning that they would face more actions unless they pull the plug on their fossil fuel clients"* **UKOP14: pages 254-257**.

46. On 29 October 2024, it was reported that six Extinction Rebellion supporters were arrested for spraying the Gerkin building with chalk spray, which the press release by Extinction Rebellion stated was *"to highlight the firm's leading role in insuring fossil fuel crooks to set the planet on fire"* **UKOP14: pages 258-261**.

47. On 30 October 2024, it was reported that ten supporters occupied the offices of insurers AIG Talbot in Fenchurch Street, with three of the supporters also scaling the building and unfolding a banner saying *"Insuring fossil fuels= Climate chaos"*. One supporter was arrested **UKOP14: pages 262-268**.

STATEMENTS FROM EXTINCTION REBELLION AND JUST STOP OIL

48. The recent action taken by Extinction Rebellion and Just Stop Oil, as referred to above at paragraphs 21 to 47, indicates that both groups are continuing to target companies and organisations affiliated to the oil and gas industry.

49. In a press release dated 29 September 2023, Extinction Rebellion announced their first UK-wide monthly "Day of Action" campaign, which was intended to build on the "Big One" movement referred to at paragraph 38 of my Fourth Witness Statement. The release stated *"Our uprising to end all uprisings starts here"* and a spokesperson for Extinction Rebellion said *"we will mobilise and send a clear message that the fossil fuel era is over. Now more than ever we need to unite together and become a force that cannot be ignored"* **UKOP14: pages 269-272**.

50. Following Extinction Rebellion supporters blocking the oil and gas summit Energy Intelligence Forum (referred to at paragraph 24 above), a spokesperson for Extinction Rebellion stated on 17 October 2023 that *"We will not stop until necessary measures are taken immediately to halt new oil, gas and coal production. We will continue to ramp up direct disruptive action…"* **UKOP14: page 113**. In a subsequent press release dated 1 January 2024, Extinction Rebellion referred to *"escalating actions and tactics throughout the course of the year"* and stated *"Now we step it up. We mobilise… Turn your rage into resistance*" **UKOP14: pages 273-278.**

51. According to an Extinction Rebellion press statement dated 14 February 2024, businesses that will be targeted by direct disruptive action include insurance industry firms unless they *"stop greenlighting fossil fuel projects"*. The group added *"If they fail to do so, Extinction Rebellion and the other members of the coalition will use a wide variety of protest tactics to bring their behaviour*

to public and media attention with the aim of causing major reputational and revenue damage … This is only the beginning. We won't stop until insurers get out of the fossil fuel industry for good" **UKOP14: pages 279-282**.

52. Extinction Rebellion also announced on 14 October 2024 an "Insure Our Survival" campaign. The press release by Extinction Rebellion on this day stated they had issued an ultimatum letter to executives at UK-based insurance companies which stated: *"Make a pledge to get out of new oil, coal and gas- or face actions and protests"*. The press release also stated that *"Thousands of ordinary members of the public… will flood into the City of London from October 28 to target insurers with a wave of nonviolent direct actions… After three days of intensive action in the capital, the campaign will spread out to target the offices of insurers in towns and cities across the UK"* **UKOP14: pages 283-287**.

53. Combined, these statements by Extinction Rebellion indicate that Extinction Rebellion remains committed to action against companies and organisations affiliated to the oil and gas industry without any discernible end date and suggests that Extinction Rebellion may escalate their actions going forwards.

54. The press statement by Extinction Rebellion on 29 September 2023 also confirmed that the "Day of Action" campaign is part of the group's strategy to build and strengthen alliances with other climate and environmental groups **UKOP14: pages 269-272** and it was later announced on 31 October 2023 that Extinction Rebellion intends to expand its "movement" to reach out to other organisations and groups to organise actions and events **UKOP14: pages 288-290**. This suggests the group may be involved in more co-ordinated action with other campaign groups in the future, including Just Stop Oil, as evidenced by the joint targeting of insurers' offices by Just Stop Oil and Extinction Rebellion supporters on 1 March 2024 and 2 May 2024 (referred to at paragraphs 32 and 37 above).

55. Just Stop Oil have made various statements in their press releases which suggest they will also continue to target the oil and gas industry and those affiliated with it and may commence new campaigns in this regard. This includes the following:

    (a) Press statements by Just Stop Oil on 29 November 2023 and 7 December 2023 stated that *"It's up to all of us to come together and resist….We're coming together to demand an end to new oil and gas. It's not a case of 'if' we will win; but 'when'* **UKOP14: pages 131 and 293**.

    (b) In a press release entitled *"We need a Revolution. What's the Plan"* dated 3 March 2024, Just Stop Oil announced a "*democratic revolution*" and confirmed that, throughout 2024, "*nonviolent civil resistance to a harmful state will continue, with coordinated, radical actions that reach out to new people and capture the attention of the world. Alongside this, a new political project will be set up*" . In the same press statement Just Stop Oil issued a new three-part demand: *"No New Oil, Revoke Tory Licences and Just Stop Oil by 2030"*. The statement confirmed that the group "*in addition to disrupting high-profile cultural events and continuing our Stop Tory Oil campaign Just Stop Oil will commence a campaign of high-level actions at sites of key importance to the fossil fuel industry – airports"* **UKOP14: pages 294-295**.

    (c) On the same date, the Telegraph reported that a leading Just Stop Oil campaigner had confirmed that the group intended "*to continue targeting businesses and MPs' homes despite Rishi Sunak warning against the rise of "mob rule" in Britain"* **UKOP14: pages 296-298**.

    (d) In reference to its campaign of taking action at airports on 10 March 2024, Just Stop Oil stated on X (formerly known as Twitter) that *"Our Government doesn't care about its*

responsibilities, so it's up to us to come together and confront the fossil fuel elites this summer" **UKOP14: page 159**. A subsequent press release dated 22 July 2024 confirmed that Just Stop Oil supporters would be taking action at airports as no assurance had been given that the UK government would enter into *"a legally binding treaty to stop extracting and burning oil, gas and coal by 2030"* **UKOP14: pages 299-300**.

(e) In advance of the UK election in July 2024, Just Stop Oil released a press statement dated 13 June 2024 which stated that "*If the incoming leader does not support this treaty, Just Stop Oil will begin a new campaign of civil resistance… This is the start of an International Uprising. And it's only just getting started. The era of fossil fuels is over"* **UKOP14: page 302**.

(f) Press statements by Just Stop Oil dated 10 July 2024, 24 July 2024, 29 July 2024, 30 July 2024 and 1 August 2024 state *"As long as political leaders fail to take swift and decisive action…Just Stop Oil supporters, working with other groups internationally, will take the proportionate action necessary to generate much needed political pressure...areas of key importance to the fossil fuel economy will be declared sites of civil resistance around the world"* **UKOP14: pages 249, 173, 179, 188 and 198**.

56. Just Stop Oil has remained consistent in its attempts to recruit supporters to join in direct action. Examples of this are as follows:

(a) As part of announcing a further campaign of slow marches in November 2023, a press release by Just Stop Oil dated 9 October 2023 stated: *"It's up to all of us now to come together and resist... Together we can be the real opposition this country needs and we will win. We will stop new oil and gas... Its People vs Oil!"* **UKOP14: page 106** .

(b) After two Just Stop Oil supporters targeted the National Gallery (referred to at paragraph 26 above), a Just Stop Oil spokesperson commented in its press release dated 6 November 2023 that "*governments [are] destroying our home, our families and our institutions in order to enrich criminal oil barons and corporations. The only thing that has ever stood in their way is ordinary people, taking to the streets to demand change. We invite everyone to join us"* **UKOP14: page 124**.

(c) A press statement entitled *"An invitation to join us*" by Just Stop Oil on 16 December 2023 stated that *"to protect the common good there is a requirement to disrupt the public order and to break the law"* **UKOP14: pages 303-308**.

(d) Various press releases, such as those on 10 May 2024, 7 June 2024, 19 June 2024 and 20 June 2024, invite supporters to *"Sign up to take action"* **UKOP14: pages 217, 230, 237 and 165**.

(e) Main pages on the Just Stop Oil website state *"Civil Resistance works- Join us"* and invites supporters to *"be part of this International Uprising… All the freedoms we enjoy have been won by groups of people stepping into disobedience – asking nicely just doesn't cut it. And that's all without saying just how dire our situation is and how quickly we must act"* **UKOP14: pages 309-313**.

57. The materials that have been published on Just Stop Oil's and Extinction Rebellion's websites, as well as the direct targeting of organisations outlined above, continue to indicate that oil and gas companies will remain a target of their campaign. Consequently, there remains a risk to the Claimants' sites which the Order granted in its current terms protects against.

58. Of particular concern to the Claimants is Just Stop Oil's new campaign (referred to at paragraph 35 above) to target airports, given that, as Mr Peter Davis refers to at paragraphs 16 - 21 of his

first witness statement dated 7 April 2022, the terminal at Site 1 is an important fuel source to the British aviation industry, providing aircraft fuel for local airports including Gatwick, Heathrow and Luton airports. It is therefore of key strategic importance to the UK as a key hub in the distribution of fuel for aviation and Heathrow, Gatwick and Luton airports depend on supplies from the Site 1 terminal to maintain operations. In addition, the terminal at Site 2 is also of key strategic importance to the UK as it provides aviation kerosene to the Midlands airports. Protests at either of the Sites therefore have the potential to impact the airports at Luton and the Midlands airports as well as Heathrow and Gatwick (which have already been a target, see paragraph 35 above). A copy of the press release detailing this plan is at **UKOP14: pages 294-295**.

OTHER INJUNCTION PROCEEDINGS

59. The only updates to my knowledge in relation to:

(a) the injunctions granted to oil and gas companies in relation to protests against the industry, as set out at paragraph 45 of my Fourth Witness Statement and paragraph 28 of my Fifth Witness Statement, are as follows:

Claim Number	Property	Claimant(s)	Duration of injunction
QB-2022-001259	Shell Centre Tower	Shell International Petroleum Company Limited	Interim injunction was extended on 17 April 2024 until 12 November 2024 or a date within 4 weeks after the date of the final hearing.
QB-2022-001241	Shell Haven Site	Shell UK Limited	Interim injunction was extended on 17 April 2024 until 12 November 2024 or a date within 4 weeks after the date of the final hearing
QB-2022-001420	Petrol filling station	Shell UK Oil Products Limited	Interim injunction was extended on 17 April 2024 until 12 November 2024 or a date within 4 weeks after the date of the final hearing
QB-2022-001098	Fawley Petrochemical Complex, Hythe Terminal, Avonmouth Terminal, Birmingham Terminal, Purfleet Terminal, West London Terminal, Hartland Park Logistics Hub and Alton	Esso Petroleum Company Limited and Exxonmobil Chemical Limited	Final injunction granted on 29 January 2024 until 11 July 2028 subject to annual review on 18 July of each year

	compound at Holybourne		
QB-2022-000904	Pembroke oil refinery and jetties, Manchester oil terminal, Kingsbury oil terminal, Plymouth oil terminal, Cardiff terminal, Avonmouth terminal and Pembrokeshire terminal	Valero Energy Ltd, Valero Logistics UK Ltd and Valero Pembrokeshire Oil Terminal Ltd	Final injunction granted until 13 December 2028 or further order in the meantime following a hearing on 17 January 2024

(b) the injunctions obtained by parties against persons unknown including those affiliated or connected to the Extinction Rebellion, Just Stop Oil and/or Insulate Britain campaigns set out at paragraph 46 of my Fourth Witness Statement are as follows:

Claim Number	Property/Land	Claimant(s)	Duration of injunction
KB-2022-001317	Roads in the vicinity of Navigator Terminals Thurrock terminal; Esso's Purfleet terminal; Exoleum's Grays terminal; and Oikos' Canvey Island terminal	Thurock Council Essex County Council	A final injunction up until and including 12 July 2029, subject to a review hearing on 11 July 2025
QB-2021-003576 QB-2021-003626 QB-2021-003737	M25, M25 feeder roads and Kent roads	National Highways	Injunction has been extended until 10 May 2025 following a hearing on 26 April 2024
QB-2021-003841	Multiple A roads, bridges and tunnels in London	Transport for London	Final injunction until 2 May 2028. Review hearing took place on 13 May 2024 with judgment reserved.
KB-2022-003542	Multiple Roads, bridges and tunnels in London	Transport for London	Final injunction until 2 May 2028. Review hearing took place on 13 May 2024 with judgment reserved.
KB-2024-002210	Heathrow Airport	Heathrow Airport Limited	Interim injunction until 9 July 2029 granted on 10 July 2024

KB-2024-002336	Gatwick Airport	Gatwick Airport Limited	Injunction granted on 19 July 2024 until 19 July 2025
KB-2024-001765	London City Airport	London City Airport Limited and Docklands Aviation Group Limited	Injunction granted on 20 June 2024 until 20 June 2029, final determination or further order in the meantime
KB-2024-002132	London Stansted Airport, Manchester Airport and East Midlands International Airport	Manchester Airport PLC, Airport City (Manchester) Ltd, Manchester Airport Car Park Limited, Stansted Airport Ltd and East Midlands International Airport Ltd	Injunction granted on 5 July 2024 with immediate effect unless varied, discharged or extended by further order with a periodic review at intervals not exceeding 12 months
KB-2024-002473	Bristol Airport and Liverpool Airport	Birmingham Airport Limited, Liverpool Airport Limited, Peel L&P Investments (North) Limited, Bristol Airport Limited, South West Airports Limited and Bristol Airport Developments Limited	Injunction granted on the 6 August 2024 with immediate effect unless varied, discharged or extended by further order subject to an annual review on the anniversary of the order
KB-2024-002317	Leeds Airport, London Luton Airport and Newcastle International Airport	Leeds Bradford Airport Limited, London Luton Operations Limited, Newcastle International Airport Limited and Nial Services Limited	Injunction granted on 19 July 2024 with immediate effect unless varied, discharged or extended by further order, subject to a periodic review at intervals not exceeding 12 months
KB-2024-002596	London Southend Airport	London Southend Airport Company Limited, London Southend Solar Limited and Thames Gateway Airport Limited	Injunction grated on the 14 August 2024 until 14 August 2029, final determination of the claim or further

			order in the meantime

SUMMARY

60. The evidence set out above, as well as that in my Previous Witness Statements, confirms that there continues to be frequent and significant direct action undertaken by Just Stop Oil and Extinction Rebellion, and which continues to target those affiliated with the oil and gas industry. There is also no clear end date to the action and both organisations would appear to be focused on mobilising their supporters and recruiting new members to their campaigns.

61. As referred to at paragraph 55 of my Third Witness Statement and paragraph 48 of my Fourth Witness Statement, given the importance of the Sites covered by the Order, Just Stop Oil and Extinction Rebellion's continuing campaigns, and the highly disruptive and inherently dangerous effect of their protesting techniques, means that I continue to believe that, in the absence of the final injunctive relief under the Order continuing, there is a real risk of imminent trespass on the Sites and / or interference with the private access routes in relation to both Sites. I do not believe that this risk is likely to abate in the near or medium future.

62. The Order continues to have a deterrent effect, and its impact (as well as that of similar orders granted to other oil and gas operators) has been referred to by Just Stop Oil and Extinction Rebellion when explaining why sites owned by oil and gas operators have not been the target of recent protests, for example:

(a) in response to a member of the public tweeting:

"*They are in the wrong place. Outside oil refineries would be the right place to protest. Then of course they would not get the publicity they crave. Stopping workers only make their protest null and void."*

on 9 June 2023 at 10.20am Just Stop Oil tweeted:

"*Do you know what happens if you protest outside oil refineries now? Oil companies have bought injunctions to ban people from taking action at refineries, distribution hubs, even petrol stations. Punishments for breaking injunctions range from unlimited fines to imprisonments"*

Extinction Rebellion UK retweeted the above tweet on 9 June 2023 (**UKOP9: page 8** and paragraph 12(b) of my Fourth Witness Statement); and

(b) as referred to at paragraph 17(b) above, on 13 September 2023, Just Stop Oil tweeted in relation to Just Stop Oil led protests in Portsmouth involving road blockades:

> *"Disruption is frustrating, but we have no other choice. Fossil fuel companies have taken out private injunctions that make protests impossible at oil refineries, oil depots and even petrol stations"* **UKOP14: page 8.**

63. Consequently, the Claimants are applying for the Order to remain in place in its current form until 23:59 hrs on 20 October 2028, subject to the annual reviews provided for at paragraph 12 of the Order.

PROCEEDINGS

64. I refer to paragraphs 42 and 43 of my Fifth Witness Statement. The Claimants' solicitors have confirmed to me that no acknowledgment of service, admission or defence has been received on behalf of any Defendant to these proceedings since my Fifth Witness Statement (or at all). The Claimants' solicitors have also confirmed to me that no Defendant has ever engaged with these proceedings.

APPLICATION DATED 4 NOVEMBER 2024

65. The following paragraphs of my statement relate to, and are made in support of, the Application made by the Claimants on 4 November 2024.

66. In each of the April 2022 Orders, the April 2023 Order (together, the "**Interim Orders**") and subsequently the Order, there has been a requirement for the Claimants to effect service of the respective Orders by fixing copies of the Order in clear transparent sealed containers at a minimum number of 2 prominent locations on the perimeter of each of the Sites. This requirement can be found at paragraph 6(b) of the Order. The April 2022 Orders also required a note of the respective hearings and the Court Documents to be served in this way, as well as any future applications in these proceedings by the Claimants together with their evidence in support, The Claimants' compliance with these service requirements is set out in the following documents:

(a) paragraphs 6 to 9 of the Second Witness Statement of Daniel Owen Christopher Talfan Davis dated 14 April 2022;

(b) paragraphs 6 and 7 of the Third Witness Statement of Daniel Owen Christopher Talfan Davis dated 14 April 2023; and

(c) paragraphs 8 and 9 of the Second Witness Statement of Antony Douglas Phillips dated 23 November 2023.

67. The cumulative effect of the Claimants having complied with the service requirements in each of the respective Orders is that the sealed containers at each of the Sites have become cumbersome as they are effectively 'stuffed' with documents. Not only are the containers visually displeasing and difficult for any party to navigate their contents, but as the containers are kept outside at all times, the weather conditions in the last two years have also led to a deterioration in the condition of the containers and the documents inside. Two images of the containers can be found at **UKOP14: pages 314-315** in which it can clearly be seen that the containers have started to disintegrate.

68. In fact, BBC Radio 4 released a recording on 2 July 2024 called "*On Trial: Protesters versus the Law*", which can be listened to at https://www.bbc.co.uk/programmes/m0020qkr and which relates to a reporter visiting Kingsbury Oil Terminal, of which Site 2 forms part. A transcript of the recording can be found at **UKOP14: pages 316-342** in which the reporter describes finding, in front of Kingsbury oil terminal something "*quite bizarre*" in the form of " *a big plastic storage box that you might use to store stuff under your bed or something, and it's got a sign on the front saying High Court injunction*". The reporter makes the following statements in relation to the sealed containers:

> *"It doesn't feel like an official way to present documents… they're all in sort of disintegrating plastic folders……..This is here to inform potential protesters that there is an injunction in place here…inside it .. is basically loads and loads of files with different injunctions in them… it's very mouldy… I'm not sure anyone other than us would wade through this box of mouldy documents but there is also a sign on the fence that summarises the terms of the injunction"*.

69. Paragraph 7 of the Order provides that 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. However, the Claimants are incurring costs in replacing the sealed containers and the documents inside because of their deterioration.

70. At the Return Date hearing on 20 April 2023, the Claimants' Counsel informed the Honourable Mr Justice Rajah that the sealed containers at the Sites had been removed **UKOP14: page 369.** I understand, from having read the paragraphs of the transcript which relate to this issue that Mr Justice Rajah interpreted this as the documents inside the containers having been taken away to be read, stating "*Well, if I may say, the removal of the documents shows that it works because they have been taken away to be read……and to bring it to the attention to those who are interested*." However, Mr Justice Rajah also made clear that he had no objection to the containers only being filled once, stating "*I do not have any objection to them only being filled once*."

71. I am only aware of a single incident of the containers at the Sites having been removed prior to the Return Date hearing in April 2023. I am aware that the removal occurred during a tidying up exercise following protestor activity. However, I cannot confirm who removed these containers.

72. As can be seen from the photographs at **UKOP14: pages 314-315** the containers are currently placed at the entrances to the Sites in order to come to the attention of any party who may intend to enter the Sites. However, there is no parking at the entrances to the Sites, which are in constant use. As such, in order for any potential Defendants to read the documents contained within the containers, they would need to park on the junction at the entrance to the Sites. The Claimants are concerned that this creates a potential hazard to anyone entering or leaving the Sites as well as any Defendants. The same issue does not arise in relation to anyone wishing to read the Site 1 Notice and the Site 2 Notice as they are affixed at multiple locations around the Sites including entranceways, access points, gates and attached to the perimeter fencing.

73. For all of the above reasons, the Claimants seek the Court's permission:

    (a) to dispense with any requirement in the Interim Orders on the Claimants to continue to fix copies of documents in clear transparent sealed containers at each of the Sites; and

    (b) for paragraph 6(b) of the Order to be amended so that the Claimants are permitted to affix copies of the Order at a minimum number of 2 prominent locations on the perimeter of each of the Sites, whether that is in in clear transparent sealed containers, or by any other method.

74. For the avoidance of doubt, the Claimants will continue to comply with the requirements for service contained at paragraph 6(a), (c) and (d) of the Order and which include:

    (a) Posting the Order at the following web link: https://ukop.azurewebsites.net;

    (b) 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

(c) 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.

For the reasons set out in this statement and the Previous Witness Statements, I respectfully request that the final injunction granted by the Order continues and that the Application is granted in the terms sought.

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: 7FAFE9820F7D47D... Dated: 4 November 2024

John Michael Armstrong

Party: Claimants
Witness: Antony Douglas Phillips
Number: Third
Exhibit: UKOP15
Dated: 11 November 2024

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

B E T W E E N

(1) UNITED KINGDOM OIL PIPELINES LIMITED

First Claimant / Applicant

(2) WEST LONDN 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 ATTACHED SITE 2 PLAN)

First Defendants / Respondents

(2) PERSONS UNKNOWN WITHOUT CONSENT AND IN CONNECTION WITH OR AFFILIATED TO THE EXCTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN OBSTRUCTING OR 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 ATTAHCED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE (SHOWN FOR IDENTIFICATION SHADED BLUE ON THE ATTACHED SITE 2 PLAN)

Second Defendants / Respondents

THIRD WITNESS STATEMENT OF

ANTONY DOUGLAS PHILLIPS

I, **Antony Douglas Phillips**, 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 **"UKOP15"**. 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 Simon Gleeson (sitting as a Judge of the Chancery Division) dated 6 October 2023 (the **"Order"**).

SERVICE OF NOTICE OF HEARING AND COURT DOCUMENTS

5. I make this witness statement in order to evidence the Claimants' compliance with paragraph 9 of the Order in serving the Notice of Hearing dated 23 October 2023 (the **"Notice"**) on the Defendants.

6. I also make this witness statement in support of the Claimants' compliance with paragraph 9 of the Order in serving the following documents on the Defendants:

   (a) N244 Application Notice dated 4 November 2024;

   (b) Draft Order;

   (c) Sixth Witness Statement of John Michael Armstrong dated 4 November 2024; and

   (d) Exhibit UKOP14

   (the **"Court Documents"**).

7. Further, I make this statement in support of the Claimants' compliance with paragraph 9 of the Order in serving the sealed Application Notice dated 4 November 2024 (the **"Sealed Application Notice"**).

Compliance with paragraph 9(a) of the Order

8. At 11:00am on 23 October 2024, Jody Sanders of Fieldfisher, the Claimants' solicitors, uploaded the Notice to https://ukop.azurewebsites.net, being the web link in the Order.

9. Between 16:41pm and 16:47pm on 4 November 2024, Andrew Fletcher of Fieldfisher, the Claimants' solicitors uploaded the Court Documents to https://ukop.azurewebsites.net.

10. At 10:30am on 11 November 2024, Jody Sanders of Fieldfisher, the Claimants' solicitors, uploaded the Sealed Application Notice to https://ukop.azurewebsites.net.

11. A screenshot of the web link page hosting the Notice, the Court Documents and the Sealed Application Notice (and all previous documents that have been served in these proceedings) appears at **UKOP15:3**.

Compliance with paragraph 9(b) of the Order

12. At 12:22pm on 24 October 2024, an email was sent by Marcus Farrell of Fieldfisher on my behalf to xr-legal@riseup.net (**UKOP15:4-15)** and at the same time and on the same day to juststopoil@protonmail.com, info@juststopoil.org, and juststopoilpress@protonmail.com (**UKOP15:16-27**) confirming that:

    (a) the Court has issued the Notice which states that the hearing to review the final injunction Order has been listed in a three day window from the 19 November 2024 with a time estimate of 2.5 hours (the **"Hearing"**); and

    (b) a copy of the Notice can be found at the following weblink: https://ukop.azurewebsites.net.

13. Copies of the delivery receipts for these emails can be found at **UKOP15:28-29**.

14. At 12:23pm on 24 October 2024, an automatically generated response was received from xr-legal@riseup.net with the subject line "thAutoreply for XR Legal Support" and which confirmed that the XR Legal Support Team had received Fieldfisher's email referred to at paragraph 12 above and was *"working on getting a response to you ASAP!"*. A copy of this email can be found at **UKOP15:30**.

15. At 17:52pm on 4 November 2024, an email was sent by Faye Hyland of Fieldfisher to xr-legal@riseup.net (**UKOP15:31-43)** and at 17:49pm on the same date to juststopoil@protonmail.com, info@juststopoil.org, and juststopoilpress@protonmail.com (**UKOP15:44-56**) confirming that:

    (a) in advance of the Hearing, the Claimants have made an application to the Court that:

        (i) any requirements on the Claimants in the interim orders made in these proceedings to continue to fix copies of documents in these proceedings in clear transparent sealed containers by way of service be dispensed with; and

        (ii) that paragraph 6(b) of the Order be amended such that, prospectively, the Claimants be permitted to affix copies of the Order at a minimum number of 2 prominent locations of the perimeter of each of the Sites whether in clear transparent sealed containers or by any other method

    (the **"Application"**);

    (b) the Claimants have requested that the Application be dealt with at the upcoming Hearing;

    (c) the Claimants have filed further evidence for the Hearing and in support of the Application at Court in accordance with paragraph 13 of the Order;

    (d) copies of the Court Documents can be found at the following weblink: https://ukop.azurewebsites.net;

    (e) any individual who wishes to come forward to defend the proceedings is entitled to file a skeleton argument not less than 3 days before the date of any hearing;

    (f) any individual who may wish to come forward to defend the Application is referred to Practice Direction 23A paragraph 7.2 of the Civil Procedure Rules in that if the defendant to an application wishes to rely on written evidence at the hearing of the application, he must file and serve the written evidence as soon as possible. Practice Direction 23A paragraph 6.4 of the Civil Procedure Rules provides that documents which are required

to be filed and served in advance of a hearing must be filed and served no later than 4pm at least 2 days before that hearing unless the Court directs otherwise; and

(g) We (i.e. Fieldfisher) are authorised to accept service for and on behalf of the Claimants and that service of any evidence or skeleton arguments can be affected by emailing the relevant documents to UKOPinjunction@fieldfisher.com.

16. Copies of the delivery receipts for these emails can be found at **UKOP15:57-58**.

17. At 17:53pm on 4 November 2024, an automatically generated response was received from xr-legal@riseup.net with the subject line "Autoreply for XR Legal Support" and which confirmed that the XR Legal Support Team had received Fieldfisher's email referred to at paragraph 15 above and was *"working on getting a response to you ASAP!"*. A copy of this email can be found at **UKOP15:59**.

18. At 11:33am on 11 November October 2024, an email was sent by Honey Newbury of Fieldfisher on my behalf to xr-legal@riseup.net (**UKOP15:60-73)** and at 11:32am on the same day to juststopoil@protonmail.com, info@juststopoil.org, and juststopoilpress@protonmail.com (**UKOP15:74-87**) confirming that:

(a) a copy of the Sealed Application Notice can be found at the following weblink: https://ukop.azurewebsites.net; and

(b) The Application will be heard at the Hearing.

19. Copies of the delivery receipts for these emails can be found at **UKOP15:88-89**.

20. At 11:33am on 11 November 2024, an automatically generated response was received from xr-legal@riseup.net with the subject line "Autoreply for XR Legal Support" and which confirmed that the XR Legal Support Team had received Fieldfisher's email referred to at paragraph 18 above and was *"working on getting a response to you ASAP!"*. A copy of this email can be found at **UKOP15:90**.

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: 11 November 2024

Antony Douglas Phillips

Party: Claimants
Witness: Antony Douglas Phillips
Number: Fourth
Exhibit: UKOP16
Dated: 20 December 2024

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

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 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 EXCTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN OBSTRUCTING OR 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 ATTAHCED SITE 1 PLAN) (B) THE KINGSBURY OIL TERMINAL, KINGSBURY, WARWICKSHIRE (SHOWN FOR IDENTIFICATION SHADED BLUE ON THE ATTACHED SITE 2 PLAN)

Second Defendants / Respondents

FOURTH WITNESS STATEMENT OF

ANTONY DOUGLAS PHILLIPS

I, **Antony Douglas Phillips**, 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 **"UKOP16"**. 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 Simon Gleeson (sitting as a Judge of the Chancery Division) dated 6 October 2023 (the **"Gleeson Order"**).

SERVICE OF THE ORDER

5. I make this witness statement in order to evidence the Claimants' compliance with paragraph 4 of the Order of Mr Justice Miles dated 20 November 2024 (the **"Order"**) by serving the Order pursuant to the steps set out in paragraphs 9 – 11 of the Gleeson Order.

6. I also make this witness statement in order to evidence the Claimants' compliance with paragraph 6(b) of the Gleeson Order, as amended by paragraph 3 of the Order.

Compliance with paragraph 9(a) of the Gleeson Order

7. At 14:43 on 26 November 2024, Andrew Fletcher of Fieldfisher, the Claimants' solicitors, uploaded the Order to https://ukop.azurewebsites.net, being the web link in the Gleeson Order.

8. A screenshot of the web link page hosting the Order (and all previous documents that have been served in these proceedings) appears at **UKOP16:3.**

Compliance with paragraph 9(b) of the Gleeson Order

9. At 17:39 on 27 November 2024 an email was sent by Marcus Farrell of Fieldfisher on my behalf to xr-legal@riseup.net (**UKOP16:4-20)** and on the same date at 17:40 to juststopoil@protonmail.com, info@juststopoil.org, and juststopoilpress@protonmail.com (**UKOP16:21-37**) confirming that:

   (a) the final injunctive relief granted by the Gleeson Order and the Claimants' Application dated 4 November 2024 (the "**Application**") were considered at the hearing which took place on 20 November 2024 before Mr Justice Miles (the **"Hearing"**);

   (b) at the Hearing, the Court made no order as to the continuing effect of the Gleeson Order and permitted amended service provisions under the Gleeson Order pursuant to the Application; and

   (c) the Order made at the Hearing can be found at https://ukop.azurewebsites.net.

10. Copies of the delivery receipts for these emails can be found at **UKOP16:38-39.**

11. At 17:40 on 27 November 2024, an automatically generated response was received from xr-legal@riseup.net with the subject line "Autoreply for XR Legal Support" and which confirmed that the XR Legal Support Team had received Fieldfisher's email referred to at paragraph 9 above and

was *"working on getting a response to you ASAP!"*. A copy of this email can be found at **UKOP16:40**.

Compliance with paragraph 6(b) of the Gleeson Order as amended by paragraph 3 of the Order – Site 1

12. On the instructions of the Claimant's solicitors, at approximately 13:43 on 28 November 2024, Doug Sidwick, being an employee of British Pipeline Agency Limited, the agent of the First Claimant, effected service of the Gleeson Order by affixing copies in clear envelopes to the perimeter fencing and gates at two prominent locations at Site 1, as shown in the photographs at **UKOP16:41-42.**

Compliance with paragraph 6(b) of the Gleeson Order as amended by paragraph 3 of the Order – Site 2

13. On the instructions of the Claimant's solicitors, at approximately 11:29 on 6 December 2024, Darren Gilligan, being an employee of British Pipeline Agency, the agent of the First Claimant, effected service of the Gleeson Order by affixing copies in clear envelopes to the perimeter fencing and gates at two prominent locations at Site 2, as shown in the photographs at **UKOP16:43-44.**

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: 20 December 2024

Antony Douglas Phillips

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Party: Claimant
Witness: John Michael Armstrong
Number: Seventh
Exhibit: UKOP17
Dated: 24 October 2025

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 / 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

SEVENTH WITNESS STATEMENT OF

JOHN MICHAEL ARMSTRONG

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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 1,000km of fuel pipes in the UK.

3. BPA acts as agent for the First Claimant United Kingdom Oil Pipelines Limited ("**UKOP**") and the Second Claimant West London Pipeline and Storage Limited ("**WLPSL**"), and it operates and maintains their UK based assets.

4. I am duly authorised to make this witness statement on behalf of the Claimants.

5. 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.

6. Produced and shown to me is a bundle of documents containing exhibit "**UKOP17**". Unless otherwise stated, page references in this witness statement refer to pages in that exhibit.

7. Unless otherwise stated, in this statement I adopt the definitions set out in my first witness statement dated 7 April 2022.

CURRENT POSITION

8. On 12 April 2022 Peter Knox QC (sitting as a Judge of the Chancery Division) granted an interim injunction to restrain the Defendants from trespassing, causing damage or removing equipment from the Sites and / or obstructing or otherwise interfering with the First Claimant's access over private access roads at the Sites (the "**Interim Injunction**"). On 21 April 2022, the Injunction was extended until 20 April 2023 (together, the "**April 2022 Orders**").

9. On 21 April 2023, the Injunction was extended by Order of The Honourable Mr Justice Rajah (the "**April 2023 Order"**), until:

   (a) 20 October 2023;

   (b) final determination of the claim; or

   (c) further claim in the interim.

10. On 6 October 2023, Mr Simon Gleeson (sitting as a Judge of the Chancery Division) granted an Order (the "**October 2023 Order**") for final injunctive relief to restrain the same activities prohibited by the Interim Injunction (the "**Final Injunction**").

11. It was also Ordered, pursuant to paragraph 12 of the October 2023 Order, that there shall be, on or around the anniversary of the October 2023 Order (being 6 October each year) a hearing to review the Final Injunction granted therein.

12. On 20 November 2024, at the first annual review of the October 2023 Order, by the Order of The Honourable Mr Justice Miles, the Final Injunction was continued (the "**November 2024 Order**").

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13. Pursuant to the November 2024 Order:

    (a) any requirement in the April 2022 Orders and / or the April 2023 Orders on the Claimants to continue to fix copies of documents in clear transparent containers, by way of alternative service, was dispensed with;

    (b) paragraph 6(b) of the October 2023 Order was amended such that, prospectively, the Claimants be permitted to affix copies of the October 2023 Order in clear envelopes (in substitution for sealed transparent containers) to the perimeter fencing or gates at a minimum number of 2 prominent locations at each of the Sites; and

    (c) the November 2024 Order was to be served pursuant to the steps set out in paragraphs 9-11 of the October 2023 Order.

11. I make this further statement in connection with the second annual review hearing of the Final Injunction granted by the October 2023 Order.

12. For the reasons I refer to below, the Claimants consider that the Final Injunction should remain in place until 23:59 hrs on 20 October 2028, subject to the annual reviews provided for at paragraph 12 of the October 2023 Order.

13. This seventh witness statement supplements:

    (a) my first witness statement dated 7 April 2022 ("**First Witness Statement**");

    (b) my second witness statement dated 14 April 2022 ("**Second Witness Statement**");

    (c) my third witness statement dated 5 April 2023 ("**Third Witness Statement**");

    (d) my fourth witness statement dated 6 July 2023 ("**Fourth Witness Statement**");

    (e) my fifth witness statement dated 22 September 2023 ("**Fifth Witness Statement**"); and

    (f) my sixth witness statement dated 4 November 2024 ("**Sixth Witness Statement**")

    together my "**Previous Witness Statements**".

14. The purpose of this seventh witness statement is to provide the Court with an update in respect of relevant events following the grant of the November 2024 Order and since my Sixth Witness Statement and, ultimately, to demonstrate the continuing threat posed by the Defendants. It therefore addresses:

    (a) pertinent developments that evidence the continuing threat posed by the Defendants;

    (b) evidence of action targeted at other operators and / or other organisations affiliated with the oil and gas sector; and

    (c) evidence that shows that the Final Injunction has been successful in restraining individuals from potentially causing disruption to the Sites (as such term is defined in Schedule 2 of the October 2023 Order).

15. I also address, at paragraphs 43 to 52 of this statement, the Claimants' application dated 24 October 2025 for the Court's permission to amend the Claim Form and Particulars of Claim to change the description of the Defendants and that the October 2023 Order be amended to change

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the description of the Defendants accordingly (the "**Application**") and the basis on which the Application has been made.

DIRECT ACTION IN THE VICINITY OF SITE 1 AND SITE 2

16. In my First Witness Statement and Second Witness Statement, I addressed in detail the direct action suffered by the Claimants in respect of Site 1 and the direct action targeted at the operations of the Claimants in close proximity to Site 1 and Site 2. This direct action formed the basis for the Claimants seeking an initial interim order for pre-emptive injunctive relief.

17. In my Third Witness Statement, I addressed the further incidents of direct action in close proximity to Site 2 since the April 2022 Orders.

18. In my Sixth Witness Statement, I outlined that there had been no further direct action at, or in the vicinity of, Site 1 and Site 2 since the date of my Third Witness Statement. I refer to paragraphs 17 and 18 of my Sixth Witness Statement, which set out a number of factors which I believe contributed to the reduction in direct action in the vicinity of the Sites.

19. These factors included the continuing existence of an injunction order made by Mr Justice Sweeting in the King's Bench Division dated 9 May 2022 in favour of the North Warwickshire Borough Council ("**NWBC**") and which protects the locality of the Kingsbury Oil Terminal (of which Site 2 forms part) (the "**NWBC Order**"). As set out at paragraph 18 of my Sixth Witness Statement, a final trial of NWBC's claim was heard at a hearing on 6 September 2024 and a final injunction was granted until 6 September 2027, subject to annual reviews. A copy of the order is at UKOP14: pages 30-44. The first annual review hearing took place on 18 September 2025 and on 23 September 2025 HHJ Emma Kelly sitting as a Judge of the High Court ordered that the final injunction should continue. **EB5 Tab 35: 151-157** **EB5 Tab 36: 158-172**

20. I continue to believe that, if any of those factors I have referred to were to be removed, the direct action would escalate.

EVIDENCE OF ACTION BY JUST STOP OIL AND EXTINCTION REBELLION INCLUDING TARGETING OF OTHER OPERATORS AND AFFILIATED ORGANISATIONS FROM 5 NOVEMBER 2024 TO 24 OCTOBER 2025

21. Since the date of my Sixth Witness Statement, there continues to be activity targeted at industries and organisations that members of Just Stop Oil and / or Extinction Rebellion consider to be affiliated to the oil and gas industries.

22. Paragraph 24, 45, and 47 of my Sixth Witness Statement refer to the occupation by Extinction Rebellion of the City of London offices of various insurers, demanding they rule out insuring coal and oil related projects and held up signs stating "*Don't insure fossil fuels*". **[UKOP14 pages 114-119]** and "*warning that they would face more actions unless they pull the plug on their fossil fuel clients*"**. [UKOP14: pages 254-257] [UKOP14: pages 262-268].** Further examples of occupation by Extinction Rebellion have been reported since then, across England, including on 8 January 2025 Extinction Rebellion occupied the Manchester office of Marsh the insurance broker. On the "XR North" (being Extinction Rebellion North) X social media account, (as reported by The Insurance Times) it stated this was because it was ""*funding our destruction*" *by insuring fossil fuel projects*". **[UKOP17: pages 1-2]** **EB5 Tab 3: 11-16** **EB5 Tab 4-5: 17-24** **EB5 Tab 7: 28-29**

23. On 6 June 2025, the Times reported in relation to Youth Demand, "*Activists from the supposedly disbanded group [Just Stop Oil], however, were playing a central role in recruiting new members to Youth Demand to help its goal of bringing London to a halt. Events were even advertised using the JSO logo*." The Times also quoted a Just Stop Oil activist as saying, "*This is the inhale before*

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we breathe out and expand into brand new territory, into something even bigger than we've tried before." **[UKOP17: pages 3-10]** **EB5 Tab 26: 111-118**

24. On 30 January 2025, BBC News reported over 1000 activists blocked the road outside of the Royal Courts of Justice **[UKOP17: pages 11-12].** In an article in response to the protest, Just Stop Oil confirmed that they are "*committed to nonviolent direct action*…" **[UKOP17: pages 13-18]** **EB5 Tab 10: 41-42** **EB5 Tab 9: 35-40**

STATEMENT FROM JUST STOP OIL

25. The recent action taken by Extinction Rebellion, Just Stop Oil, and other associated environmental groups, as referred to above in paragraphs 21 to 24, indicates that both groups are continuing to target companies and organisations affiliated with the oil and gas industry.

26. On 27 March 2025, Just Stop Oil announced its plans to end disruptive protests and re-strategise their resistance efforts after a final demonstration on 26 April 2025. **[UKOP17: pages 19-21]**. I do not think that the Court can consider that the announcement to end disruptive protests demonstrates that there is no longer a threat to the Sites from Just Stop Oil or other environmental campaign groups due to the following: **EB5 Tab 12: 45-47**

(a) Extinction Rebellion made a similar announcement on 31 December 2022 yet has since engaged in disruptive action as is set out at paragraphs 48 to 54 (inclusive) of my Sixth Witness Statement **[UKOP17: pages 22-23]** and as referred to above at paragraph 22. **EB5 Tab 2: 9-10**

(b) On 25 April 2025, BBC News reported that Just Stop Oil had "*hung up the hi-vis*", a phrase which also features on Just Stop Oil's X page, suggesting an end to the organisations further disruptive activity [**UKOP17: pages 24-35**]. However, the donation page for Just Stop Oil states "*There's more to come. Help make it happen*" and references "*Civil resistance works*" (referring further to the 3,285 arrests and 180 "*political prisoners*"). **[UKOP17: pages 36-46]** **EB5 Tab 15: 66-77** **EB5 Tab 34: 140-150**

(c) On Just Stop Oil's website, Just Stop Oil note that "*A new campaign is in the works — one that builds on our success as Just Stop Oil, and faces the grinding injustice of our political and economic system head on. We're just getting started*." and "*More protests are coming, buckle up*". [**UKOP17: pages 36-46**] **EB5 Tab 34: 140-150**

(d) On 26 April 2025, Mel Carrington, a spokesperson for Just Stop Oil was quoted as stating in an article by Aljazeera that "*in the background, we are working with other [similar] groups…to develop a strategy for what comes next*". [**UKOP17: pages 47-50**] **EB5 Tab 16: 78-81**

(e) On 28 April 2025, Just Stop Oil posted on its X account that "J*ust Stop Oil may have finished actions but we aren't going anywhere. People will continue their resistance in the courts, and something new is building".* **[UKOP17: pages 51-52]** **EB5 Tab 17: 82-83**

(f) The "Action" page of Just Stop Oil's website states "*a new revolutionary direct action campaign is coming. Help us build what's next*". **[UKOP17: pages 53-58]** **EB5 Tab 29: 124-129**

(g) On Just Stop Oil's website, Just Stop Oil note that *"… revolutionary change is needed now more than ever*" and "*Nothing short of a political and economic revolution is going to get us out of this mess. We're just getting started*". **[UKOP17: pages 53-58]** **EB5 Tab 29: 124-129**

(h) The FAQ section of Just stop Oil's website states "*we are going to cause disruption*" and suggests that arrests are probable. **[UKOP17: pages 60-62]** **EB5 Tab 30: 130-132**

(i) On 16 May 2025, it was reported by GB News that despite Just Stop Oil's previous announcement as referred to at paragraph 26(b) above, its members still have strong intentions to seek public attention by using highly disruptive strategies. Audio recordings of an alleged private internal Just Stop Oil meeting record a co-ordinator summarising the views of the group to remain "*action based*", make sure they are "*not becoming something more like Greenpeace*" and to continue doing acts like "*Darwin's grave*" (which would appear to be a reference to two Just Stop Oil activists graffitiing Charles Darwin's grave at Westminster Abbey in January 2025) and "*citizens arrests*". Further it was "*very important to do the spicy stuff*" and that "*to do protest stuff you have to do naughty stuff*". The individual admitted Just Stop Oil had had conversations with the Citizens Arrest Network and were "*extremely jealous of the stuff they have been doing*" however, it was said, if the Citizens Arrest Network had been "*more spicy*" they would have gained more media attention. It was further stated a "*rest*" and "*reset*" was needed before coming back and there was consensus that the group should "*carry on with civil disobedience, direct action, because it's the most effective thing to do*". Finally, it was stated in the "*second go around*" it was "*very much needed*" that they had to be so unpopular with the public. The report is available on GB News' YouTube site (https://www.youtube.com/watch?v=Jzkbkc4__yw). A transcript of this report can be seen at **[UKOP17: pages 63-71].** **EB5 Tab 20: 86-94**

(j) On 19 May 2025, Just Stop Oil posted on its X account an image stating "*Just Getting Started*". **[UKOP17: page 71]** **EB5 Tab 21: 95**

(k) On 21 May 2025, Just Stop Oil circulated a link to a GB News story with the comment "*GB news was right for once. We are* "*plotting a very big comeback*"". **[UKOP17: pages 73-74]** **EB5 Tab 24: 105-106**

(l) On 3 June 2025, in a blog post written by Mel Carrington, a spokesperson for Just Stop Oil, it is stated that "[*Just Stop Oil] are building a new street movement rooted in local communities and dedicated to nonviolent civil resistance on a scale that Just Stop Oil never even dreamt of*" and asks its followers to "*Help put people on the streets*". **[UKOP17: pages 75-78]** **EB5 Tab 25: 107-110**

(m) On 18 June 2025, Just Stop Oil posted about the prospect of hotter UK summers in the next decade on their Instagram social media account with the following caption "*Over 1000 people died, homes and business burned down, roads melted and train tracks buckled. If we keep burning fossil fuels, it's only going to get worse. Help fund the nonviolent revolution. Link in bio — @just.stopoil"* **[UKOP17: page 79]** **EB5 Tab 27: 119**

(n) Previously, Just Stop Oil's website suggested its focus was on stopping the granting of new licences to extract oil or gas **[UKOP2: page 195].** However, a review of Just Stop oil's website suggests that the focus of Just Stop Oil now seems to be on the stopping of extracting and burning of oil and gas by 2030 **[UKOP17: page 60].** Given the respective Sites' role in the supply chain for oil and gas fuels across the country, the Claimants are concerned that they will remain potential protest locations in connection with Just Stop Oil's new campaign focus. **EB5 Tab 1: 6-8** **EB5 Tab 230: 130**

27. I am aware that the Court has been referred to the announcement by Just Stop Oil that it intended to stop disruptive protests in a number of recent cases where the continuation of injunctions against persons unknown including those affiliated or connected to the Extinction Rebellion, Just Stop Oil, and / or Insulate Britain campaigns have been sought. I have read the judgments in these cases which have been shared with me by the Claimants' instructed solicitors. The judgments record that the Court has determined in each case set out below that the announcement by JSO does not demonstrate that there is no longer a threat from Just Stop Oil or other environmental

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campaign groups and that a real risk of unlawful activity would subsist if the respective injunctions did not remain in place:

(a) In *(1) ESSO Petroleum Company, Limited and (2) Exxonmobil Chemical Limited v Persons Unknown* [2025] EWHC 1768 ("**Esso**") at paragraph 25 of the judgment, the Court observed that Just Stop Oil's announcement "*cannot be taken as an unequivocal and final renunciation of direct action"* and further that it would be "*premature to rely on this announcement as a basis for amending or discharging the injunction*"; (**UKOP17: pages 80-88)** **EB5 Tab 37: 173-181**

(b) In *London City Airport Ltd & Ors v Persons Unknown [*2025] EWHC 2223 at paragraph 15 of the judgment, the Court held that "*although the announcement by JSO on 21 March 2025 could signal a reduction from the risk of unlawful activity at the airports, there is also clear evidence of a possible U-turn from that announcement*" (**UKOP17: pages 89-98)**; and **EB5 Tab 39: 195-204**

(c) In *Gatwick Airport Ltd v Persons Unknown* [2025] EWHC 2228, at paragraph 29 of the judgment the Court agreed with the analysis in Esso. It was further confirmed at paragraph 30 that "*there remains such a risk from other similar protest organisations"* and, at paragraph 31 that "*There has been no indication from any of these organisations, including Just Stop Oil, that they have abandoned the convictions that has underpinned their actions thus far".* (**UKOP17: pages 99-111)** **EB5 Tab 38: 182-194**

(d) In the review hearing of the NWBC Order which I refer to at paragraph 19 above, and which took place on 18 September 2025, the Court also agreed with the Court's analysis in Esso and concluded, at paragraph 22 of the judgment, that the references to "*just getting started*", civil resistance and a "*new revolutionary direct action campaign*" on Just Stop Oil's website "*very much suggest that Just Stop Oil do indeed have further direct action planned*". The Court also found, at paragraph 23 of the judgment, that "*if individuals are minded to take direct action or other protest activity, the Terminal remains a prominent target. The evidence before the Court is that the Terminal continues to operate as it did when the Injunction was granted. The Terminal remains a prominent cog in the supply chain of oil and gas products for consumption*..." The references to "*Terminal*" in the judgment are of course to Kingsbury Oil Terminal, of which Site 2 forms part. In fact, the Chief Executive of NWBC, Mr Maxey, who gave evidence at the review hearing is recorded in the judgment (at paragraph 19) as having stated that at a meeting of the Strategic Coordinating Group of the Warwickshire Local Resilience Forum which he attended, the police indicated that they continue to regard the NWBC Order (and its power of arrest) as being "*operationally essential and being the mechanism by which order has been resorted to the site*". (**UKOP17: pages 112-125)** **EB5 Tab 40: 205-218**

28. A summary of the outcome of the recent hearings in the above matters, and the further injunction proceedings of which I am aware is at paragraphs 34(a) and 34(b) of this statement, as well as paragraph 19 in respect of the NWBC Order.

29. Indeed, activist members, including members of Just Stop Oil, acknowledge the utility of direct action and a willingness to do the same again, including:

(a) On its website, Just Stop Oil refer to their campaigns to date as "*one of the world's most effective climate campaigns*". [**UKOP17: page 53]** **EB5 Tab 29: 124**

(b) Just Stop Oil remain a member of the A22 Network, a network which will do "*whatever it takes*" to meet its aims and demands. [**UKOP17: page 126]** **EB5 Tab 31: 133**

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(c) In an article dated 19 May 2025, Ella Ward, a member of Just Stop Oil, stated, following her arrest as a result of plans to enter Manchester Airport's airfield, that she would "*still do it again*". **[UKOP17: pages 127-132]** **EB5 Tab 22: 96-101**

(d) In an article dated 23 July 2025, following conditional discharges given to Just Stop Oil members who interfered with the use of key national infrastructure, members of Just Stop Oil stated that "*direct action works*". **[UKOP17: pages 133-136]** **EB5 Tab 28: 120-123**

30. Furthermore, I am not aware of Just Stop Oil, Extinction Rebellion, or any other environmental group having provided any assurances or evidence to either the Court or the Claimants that the Sites will not be targeted again in the future.

OTHER ENVIRONMENTAL / CLIMATE CAMPAIGN GROUPS

31. As well as Just Stop Oil and Extinction Rebellion, there are other protest groups who are targeting companies and organisations affiliated with the oil and gas industry, including the following:

(a) On 21 January 2025, it was reported by the Insurance Times that members of the activist group 'Shut the System' had sabotaged the fibre optic cables of major insurance companies in London, Leeds, Birmingham and Sheffield, causing disruption to their internet operations, targeted due to their work underwriting oil and gas activities. **[UKOP17: pages 137-141]** **EB5 Tab 8: 30-34**

(b) As referenced at paragraph 26(d) above, a spokesperson for Just Stop Oil confirmed that the organisation was "*working with other [similar] groups…to develop a strategy for what comes next*". **[UKOP17: page 50]** **EB5 Tab 16: 81**

(c) It is understood that 'Youth Demand' is an offshoot of Just Stop Oil's youth wing (as mentioned at paragraph 23 above) and the Standard reported on 5 April 2025 that members of the group had swarmed to block roads in central London in protest against (inter alia) "*the development of new oil and gas projects*". Youth Demand has threatened to take part in disruptive protests, including to "*shut down"* London until its climate goals are met. **[UKOP17: pages 142-152]** **EB5 Tab 14: 55-65**

(d) The website for 'Youth Demand', as referred to above, further states that the organisation "*will be in nonviolent resistance against this rigged political system"* **[UKOP17: pages 153-155]** **EB5 Tab 32: 134-136**

(e) In March 2025, members of the activist group Citizen's Arrest Network ("**CAN**") targeted senior personnel at oil and gas companies by confronting them in public and attempting to hand them legal documents purporting to be "indictment papers" and "evidence dossiers" and which detail crimes that CAN allege the individuals have committed in their capacity as senior members of their companies. These individuals include the CEOs of Shell, EnQuest and Serica Energy. On its social media profiles CAN is publicising direct altercations close to the workplaces of oil and gas employees to its approximately 17,900 followers **[UKOP17: pages 156-157]**. On 5 April 2025, The Guardian reported that an activist involved in Extinction Rebellion "*helps run the Citizens Arrest Network*". **[UKOP17: pages 158-164]** **EB5 Tab 11: 43-44** **EB5 Tab 13: 48-54**

(f) It has been reported by the Times and the Guardian that some members of Just Stop Oil and Extinction Rebellion have splintered off to join other activist groups such as the Citizens Arrest Network and Youth Demand [**UKOP17**: **pages 5 and 163].** On 5 May 2025 Youth Demand posted on its X account that "*This summer Youth Demand and Just* **EB5 Tab 13 & 26: 53 & 113**

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Stop Oil are running a joint 6-week training course to build the generation of revolutionary organisers we need". **[UKOP17: page 165]** **EB5 Tab 19: 85**

(g) Fossil Free London is another protest group involved in direct action. Their website includes videos which promote the right to protest and training videos relating to direct action. **[UKOP17: pages 166-168]** **EB5 Tab 33: 137-139**

32. The announcement made by Just Stop Oil does not mean that it or its members will not undertake further disruptive activity whether under the title of Just Stop Oil or similar groups or organisations. Though the names and tactics may change and evolve, the evidence in this statement demonstrates that for a number of the activists the primary objective remains disruptive demonstrations against organisations they believe stand opposed to their demands, which includes oil and gas companies such as the Claimants.

33. The materials that have been published on Just Stop Oil's website, as well as the evidence outlined above, continue to indicate that oil and gas companies will remain a target of Just Stop Oil, Extinction Rebellion and other environmental campaign groups' campaigns. Consequently, there remains a risk to the Claimants' sites which the Final Injunction granted in its current terms protects against.

OTHER INJUNCTION PROCEEDINGS

34. The only updates to my knowledge in relation to:

(a) The injunctions granted to oil and gas companies in relation to protests against the industry, as set out at paragraph 45 of my Fourth Witness Statement, paragraph 28 of my Fifth Witness Statement and paragraph 59 of my Sixth Witness Statement, are as follows:

Claim Number	Property	Claimant(s)	Duration of injunction
QB-2022-001259	Shell Centre Tower	Shell International Petroleum Company Limited	Final injunction granted on 3 December 2024 until 23:59 on 3 December 2029 subject to annual review on each year. At the most recent review hearing on 17 October 2025 the Court upheld the injunction.
QB-2022-001241	Shell Haven Site	Shell UK Limited	Final injunction granted on 3 December 2024 until 23:59 on 3 December 2029

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			subject to annual review on each year. At the most recent review hearing on 17 October 2025 the Court upheld the injunction.
QB-2022-001420	Petrol filling station	Shell UK Oil Products Limited	Final injunction granted on 3 December 2024 until 23:59 on 3 December 2029 subject to annual review on each year. At the most recent review hearing on 17 October 2025 the Court upheld the injunction.
QB-2022-001098	Fawley Petrochemical Complex, Hythe Terminal, Avonmouth Terminal, Birmingham Terminal, Purfleet Terminal, West London Terminal, Hartland Park Logistics Hub and Alton compound at Holybourne	Esso Petroleum Company Limited and Exxonmobil Chemical Limited	Final injunction granted on 29 January 2024 until 11 July 2028 subject to annual review on 18 July of each year. At the most recent review hearing on 9 July 2025 the Court upheld the injunction.
QB-2022-000904	Pembroke oil refinery and jetties, Manchester oil terminal, Kingsbury oil terminal, Plymouth oil terminal, Cardiff terminal, Avonmouth terminal and Pembrokeshire terminal	Valero Energy Ltd, Valero Logistics UK Ltd and Valero Pembrokeshire Oil Terminal Ltd	Final injunction granted until 13 December 2028 or further order in the meantime following a hearing on 17 January 2024. At the most recent review hearing on 24 January 2025, the Court upheld the injunction.

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(b) The injunctions obtained by parties against persons unknown including those affiliated or connected to the Extinction Rebellion, Just Stop Oil, and / or Insulate Britain campaigns set out at paragraph 46 of my Fourth Witness Statement are as follows:

Claim Number	Property/Land	Claimant(s)	Duration of injunction
KB-2022-001317	Roads in the vicinity of Navigator Terminals Thurrock terminal; Esso's Purfleet terminal; Exoleum's Grays terminal; and Oikos' Canvey Island terminal	Thurock Council Essex County Council	A final injunction up until and including 12 July 2029, subject to an annual review hearing. However, the Claimants did not seek an extension of the Injunction at the annual review.
QB-2021-003576 QB-2021-003626 QB-2021-003737	M25, M25 feeder roads and Kent roads	National Highways	Injunction expired at 23:59 on 10 May 2025.
QB-2021-003841	Multiple A roads, bridges and tunnels in London	Transport for London	Final injunction until 2 May 2028. At a hearing in January 2025, the Court upheld the injunction subject to annual review in respect of named defendants who had not offered undertakings to the Court and in respect of Persons Unknown.
KB-2022-003542	Multiple Roads, bridges and tunnels in London	Transport for London	Final injunction until 2 May 2028. At a hearing in January 2025, the Court upheld the injunction subject to annual review in respect of named defendants who

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			had not offered undertakings to the Court and in respect of Persons Unknown.
KB-2024-002210	Heathrow Airport	Heathrow Airport Limited	Final injunction granted until July 2029, subject to review. At the most recent review hearing, in June 2025, the Court upheld the injunction.
KB-2024-002336	Gatwick Airport	Gatwick Airport Limited	Injunction granted on 19 July 2024 until 19 July 2025, extended by 12 months on 18 July 2025.
KB-2024-001765	London City Airport	London City Airport Limited and Docklands Aviation Group Limited	Injunction granted on 20 June 2024 until 20 June 2029, final determination or further order in the meantime. At the most recent review hearing in June 2025, the Court upheld the injunction.
KB-2024-002132	London Stansted Airport, Manchester Airport and East Midlands International Airport	Manchester Airport PLC, Airport City (Manchester) Ltd, Manchester Airport Car Park Limited, Stansted Airport Ltd and East Midlands International Airport Ltd	Injunction granted on 5 July 2024 with immediate effect. At the most recent review hearing of June 2025, the Court upheld the injunction.
KB-2024-002473	Bristol Airport and Liverpool Airport	Birmingham Airport Limited, Liverpool Airport Limited, Peel L&P Investments (North) Limited, Bristol Airport Limited,	Injunction granted on 6 August 2024 with immediate effect. At the most recent review hearing of

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		South West Airports Limited and Bristol Airport Developments Limited	June 2025, the Court upheld the injunction.
KB-2024-002317	Leeds Airport, London Luton Airport and Newcastle International Airport	Leeds Bradford Airport Limited, London Luton Operations Limited, Newcastle International Airport Limited and Nial Services Limited	Injunction granted on 19 July 2024 with immediate effect. At the most recent review hearing in June 2025, the Court upheld the injunction.
KB-2024-002596	London Southend Airport	London Southend Airport Company Limited, London Southend Solar Limited and Thames Gateway Airport Limited	Injunction grated on the 14 August 2024 until 14 August 2029. The first annual review hearing is set for 22 October 2025.

35. In relation to the injunction obtained in respect of London Stansted Airport, Manchester Airport and East Midlands International Airport in July 2024 and which was upheld at the recent review hearing in June 2025, the Claimants' instructed solicitors have shared with me the evidence that was made available to the Court for that review hearing, and which is in the public domain. Of particular note is the fact that on 21 May 2025, London City Airport received intelligence information from the Metropolitan Police of a protest by environmental protest groups which had been planned at Heathrow Airport to be held at the Sofitel Hotel on 20 May 2025, where an annual general meeting for Shell was being held and which was within the red line boundary of the injunction obtained by that airport. The emails from the police which were produced in evidence state that the protest was relocated to the Shell head office "*in order to avoid the risk of associated penalties for breaching the injunction".* The emails from the police go on to say that "*the injunction at [Heathrow Airport] had a real impact on the Shell protest yesterday […] To remove an injunction now would open up to further protest and whilst JSO have stepped down there appears to be a cycle of new groups emerging and this cannot be ruled out so maintaining it would be very much recommended*." [**UKOP17: pages 169-171]** **EB5 Tab 23: 102-104**

36. At paragraph 58 of my Sixth Witness Statement, I set out why the targeting of airports is a concern for the Claimants. In particular, as Mr Peter Davis refers to at paragraphs 16 - 21 of his first witness statement dated 7 April 2022, the terminal at Site 1 is an important fuel source to the British aviation industry, providing aircraft fuel for local airports including Gatwick, Heathrow and Luton airports. It is therefore of key strategic importance to the UK as a key hub in the distribution of fuel for aviation and Heathrow, Gatwick and Luton airports depend on supplies from the Site 1 terminal to maintain operations. In addition, the terminal at Site 2 is also of key strategic importance to the UK as it provides aviation kerosene to the Midlands airports. Protests at either of the Sites therefore have the potential to impact the airports at Luton and the Midlands airports as well as

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Heathrow and Gatwick (which have already been a target, see paragraph 35 of my Sixth Witness Statement and paragraph 34 above).

SUMMARY

37. The evidence set out above, as well as that in my Previous Witness Statements, demonstrates that there continues to be a significant threat posed by Just Stop Oil, Extinction Rebellion, as well as other environmental campaign groups, and which continues to target those affiliated with the oil and gas industry.

38. Despite the statements given by Just Stop Oil of late, there is no clear end date to the action of Just Stop Oil, Extinction Rebellion or other such organisations, with those organisations focusing on changing their names and members and evolving tactics, in continued efforts to meet their aims and demands.

39. As referred to paragraph 55 of my Third Witness Statement, paragraph 48 of my Fourth Witness Statement and paragraph 61 of my Sixth Witness Statement, given the importance of the Sites covered by the Final Injunction, the continuing action and / or threat of action by Just Stop Oil and Extinction Rebellion and other environmental campaigns, and the highly disruptive and inherently dangerous effect of the protesting techniques used by those groups, I continue to believe that in the absence of the final injunctive relief under the Order continuing, there is a real risk of imminent trespass and / or interference with the private access routes in relation to the Sites.

40. The Final Injunction continues to have a deterrent effect, and its impact (as well as that of Orders of a similar nature granted to other oil and gas operators) on deterring unlawful protestor activity on sites owned by oil and gas operators has been referred to by both Just Stop Oil and Extinction Rebellion, as outlined at paragraph 62 of my Sixth Witness Statement, as well as by other environmental groups, as outlined at paragraph 36 above.

41. Consequently, the Claimants are applying for the Final Injunction to remain in place in its current form until 23:59 hrs on 20 October 2028, subject to the annual reviews provided for at paragraph 12 of the October 2023 Order.

PROCEEDINGS

42. The Claimants' solicitors have confirmed to me that no acknowledgment of service, admission or defence has been received on behalf of any Defendant to these proceedings since my Sixth Witness Statement (or at all). The Claimants' solicitors have also confirmed to me that no Defendant has ever engaged with these proceedings.

APPLICATION DATED 24 OCTOBER 2025

43. The following paragraphs of my statement relate to, and are made in support of, the Application.

44. As set out in this statement, there continues to be activity targeted at industries and organisations that members of Just Stop Oil and Extinction Rebellion consider to be affiliated with the oil and gas industries, however, it is clear from the evidence that such activity is not limited to those organisations. For example:

    (a) It was "XR North", as opposed to Extinction Rebellion itself, which stated that Extinction Rebellion's occupation of the Manchester office of Marsh was due to Marsh "*funding our destruction" by insuring fossil fuel projects"* (see paragraph 22 of this statement). **EB5 Tab 7: 28-29**

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(b) On 6 June 2025, it was reported in relation to Youth Demand (rather than Just Stop Oil) that "*activists from the supposedly disbanded group [Just Stop Oil]…were playing a central role in recruiting new members to Youth Demand to help its goal of bringing London to a halt*" (see paragraph 23 of this statement). **EB5 Tab 26: 111-118**

45. Furthermore, as outlined at paragraph 31 of this statement, there are other protest groups, unrelated to Just Stop Oil and / or Extinction Rebellion (but who admit to having similar aims) which are targeting companies and organisations affiliated with the oil and gas industry, including (inter alia): "Shut the System", "Citizen's Arrest Network" and "Fossil Free London", and which, as such, now pose a threat to the Sites currently protected by the Final Injunction.

46. When considered collectively, the evidence in this statement suggests that there is a strong possibility that members of Just Stop Oil, Extinction Rebellion and / or other environmental campaigns will continue to undertake direct action whether operating under the banner of Just Stop Oil or Extinction Rebellion, or under the guise of a group or organisation with the same aim and goals but a different name. The Claimants are therefore concerned about the possibility of:

(a) the membership of Just Stop Oil and / or Extinction Rebellion evolving into a different organisation or campaign and undertaking unlawful activity at the Sites which (absent the Claimants being able to prove a connection to or affiliation with the Extinction Rebellion campaign or the Just Stop Oil campaign) would not be caught by the terms of the Final Injunction; or

(b) an organisation or campaign with the same aim and goals as Just Stop Oil and / or Extinction Rebellion undertaking unlawful activity at the Sites which would not currently be prohibited by the terms of the Final Injunction.

47. The Claimants have therefore made the Application for the Court's permission to amend the description of the Defendants on the Claim Form and Particulars of Claim and that the October 2023 Order is amended accordingly to include "*or other environmental campaign*" in order not to frustrate the purpose of the Final Injunction.

48. The Application has been made by the Claimants following the Claimants having become aware from their Instructed Solicitors of similar applications being successfully made in other final injunction cases such as the Esso case referred to at paragraph 27(a) above.

49. For all of the reasons above, the Claimants seek the Court's permission in the Application to amend the Claim Form and Particulars of Claim to change the description of the Defendants and that the October 2023 Order be amended to change the description of the Defendants accordingly.

50. As set out at paragraph 13 of this statement, the provisions of the October 2023 Order were varied pursuant to the November 2024 Order to the effect that paragraph 6(b) of the October 2023 Order be amended such that, prospectively, the Claimants be permitted to affix copies of the October 2023 Order in clear envelopes (in substitution for sealed transparent containers) to the perimeter fencing or gates at a minimum number of 2 prominent locations at each of the Sites.

51. A consolidated version of the October 2023 Order was not made following the November 2024 Order. However, in light of the Application, and for ease of reference:

(a) the amendments to the October 2023 Order made pursuant to the November 2024 Order are shown in red coloured text on the draft Order forming part of the Claimants' Application; and

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(b) the amendments sought pursuant to the Claimants' Application are shown in green coloured text on the draft order.

52. In addition, the amendments sought pursuant to the Claimant's Application are shown in red coloured text in both the Claim Form and the Particulars of Claim.

CONCLUSION

53. For the reasons set out in this statement and the Previous Witness Statements, I respectfully request that the Final Injunction granted by the October 2023 Order continues and that the Application is granted in the terms sought.

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: John Armstrong 7FAFE9820F7D47D... Dated: 24-10-2025 | 18:59:04 BST

John Michael Armstrong

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Party: Claimant
Witness: Antony Douglas Phillips
Number: Fifth
Exhibit: UKOP18
Dated: 31 October 2025

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 / 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

FIFTH WITNESS STATEMENT OF ANTONY DOUGLAS PHILLIPS

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I, Antony Douglas Phillips, of Riverbank House, 2 Swan Lane, London, EC4R 3TT will say as follows:

1. I am a Partner at Fieldfisher LLP ("**Fieldfisher**") and the solicitor with the 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 own 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 "**UKOP18**". 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 Simon Gleeson (sitting as a Judge of the Chancery Division) dated 6 October 2023 (the "**Gleeson Order**").

SERVICE OF NOTICE OF HEARING AND COURT DOCUMENTS

5. I make this witness statement to evidence the Claimants' compliance with paragraph 9 of the Gleeson Order in serving the following documents on the Defendants:

   (a) **Notice**: the Notice of Hearing dated 29 September 2025

   (b) **Court Documents**:

      (i) Seventh Witness Statement of John Michael Armstrong dated 24 October 2025; and

      (ii) Exhibit UKOP17;

      (iii) N244 Application Notice dated 24 October 2025; and

      (iv) Draft Order.

   (c) **Sealed Application Notice:** the sealed copy of the Application Notice dated 24 October 2025 referred to in paragraph 5(b)(iii) above.

Compliance with paragraph 9(a) of the Gleeson Order

6. At 9:28 on 1 October 2025, Jody Sanders of Fieldfisher, the Claimants' solicitors, uploaded the Notice to ukop.azurewebsites.net - /, being the web link in the Order.

7. At 15:09 on 27 October 2025, Jody Sanders of Fieldfisher, uploaded the Court Documents to ukop.azurewebsites.net - /.

8. At 14:19 on 30 October 2025 October 2025, Jody Sanders of Fieldfisher, uploaded the Sealed Application Notice to ukop.azurewebsites.net - /.

9. A screenshot of the web link page hosting the Notice, the Court Documents and the Sealed Application Notice (and all previous documents that have been served in these proceedings) appears at **UKOP18: page 3.** **EB5 Tab 54 234**

Compliance with paragraph 9(b) of the Gleeson Order

10. At 16:49 on 3 October 2025 Cole Cannings of Fieldfisher sent an email to xr-legal@riseup.net (**UKOP18: page 4**) and at 16:51 on the same day to juststopoil@protonmail.com, info@juststopoil.org, and juststopoilpress@protonmail.com (**UKOP18: page 5**) confirming that: **EB5 Tab 41: 219** **EB5 Tab 42: 220**

    (a) the Court had issued the Notice which states that the hearing to review the Gleeson Order has been listed in a three-day window from 11 November 2025 with a time estimate of half a day (the "**Hearing**"); and

    (b) a copy of the Notice can be found at the following weblink: https://ukop.azurewebsites.net

11. At 16:50 on 3 October 2025, an automatically generally response was received from xr-legal@riseup.net with the subject "Autoreply for XR Legal Support" and which confirmed that the XR Legal Support Team had received Fieldfisher's email referred to at paragraph 10 above and "*was working on getting a response to you ASAP!".* A copy of this email can be found at **UKOP18: page 6.** **EB5 Tab 43: 221**

12. At 15:41 on 27 October 2025 an email was sent by Cole Cannings of Fieldfisher to xr-legal@riseup.net (**UKOP18: pages 7-8**) and at 15:45 on the same day to juststopoil@protonmail.com, info@juststopoil.org, and juststopoilpress@protonmail.com (**UKOP18**: **pages 9-10**) confirming that: **EB5 Tab 44: 222-223** **EB5 Tab 45: 223-225**

    (a) in advance of the Hearing, the Claimants have made an application to the Court:

        (i) that the Claimants be permitted to amend the Claim Form and Particulars of Claim to change the description of the Defendants; and

        (ii) that the Gleeson Order be amended to change the description of the Defendants accordingly

        (the "**Application**")

    (b) the Claimants have requested that the Application be dealt with at the upcoming Hearing;

    (c) the Claimants have filed further evidence for the Hearing and in support of the Application at Court in accordance with paragraph 13 of the Gleeson Order;

    (d) copies of the Court Documents can be found at https://ukop.azurewebsites.net;

    (e) any individual who wishes to come forward to defend the proceedings is entitled to file a skeleton argument not less than 3 days before the date of any hearing;

    (f) any individual who may wish to come forward to defend the Application is referred to Practice Direction 23A paragraph 7.2 of the Civil Procedure Rules in that if the defendant to an application wishes to rely on written evidence at the hearing of the application, he must file and serve the written evidence as soon as possible. Practice Direction 23A paragraph 6.4 of the Civil Procedure Rules provides that documents which are required to be filed and served in advance of a hearing must be filed and served no later than 4pm at least 2 days before the hearing unless the Court directs otherwise; and

    (g) We (i.e. Fieldfisher) are authorised to accept service for and on behalf of the Claimants and that service of any evidence or skeleton arguments can be affected by emailing the relevant documents to UKOPinjunction@fieldfisher.com

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13. Copies of the delivery receipts in respect of the emails referred to at paragraph 12 of this statement can be found at **UKOP18: pages 11-12.** **EB5 Tab 446 - 47: 226-227**

14. At 15:42 on 27 October 2025 an automatically generally response was received from xr-legal@riseup.net with the subject "Autoreply for XR Legal Support" and which confirmed that the XR Legal Support Team had received Fieldfisher's email referred to at paragraph 12 above and "*was working on getting a response to you ASAP!".* A copy of this email can be found at **UKOP18: page 13.** **EB5 Tab 48: 228**

15. At 09:49 on 31 October 2025, Cole Cannings of Fieldfisher sent an email to xr-legal@riseup.net (**UKOP18: page 14**) and at 09:48 on the same day to juststopoil@protonmail.com, info@juststopoil.org, and juststopoilpress@protonmail.com (**UKOP18: page 15**) confirming that: **EB5 Tab 49: 229** **EB5 Tab 50: 230**

    (a) a copy of the Sealed Application Notice can be found at the following weblink: https://ukop.azurewebsites.net; and

    (b) that the Application will be heard at the Hearing.

16. Copies of the delivery receipts in respect of the emails referred to at paragraph 15 of this statement can be found at **UKOP18: pages 16-17.** **EB5 Tab 51-52: 231-232**

17. At 09:50 on 31 October 2025, an automatically generally response was received from xr-legal@riseup.net with the subject "Autoreply for XR Legal Support" and which confirmed that the XR Legal Support Team had received Fieldfisher's email referred to at paragraph 16 above and "*was working on getting a response to you ASAP!".* A copy of this email can be found at **UKOP18: page 18.** **EB5 Tab 53: 233**

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.

Signed by: Antony Phillips 2AEF4626D58B472...

Signed:…… Dated: 31-10-2025 | 16:39:49 GMT

Antony Douglas Phillips

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

Party: Claimants
Witness: Antony Douglas Phillips
Number: Sixth
Exhibit: UKOP19
Dated: 19 January 2026

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, 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, 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

SIXTH WITNESS STATEMENT OF ANTONY DOUGLAS PHILLIPS

I, Antony Douglas Phillips, of Riverbank House, 2 Swan Lane, London, EC4R 3TT will say as follows:

1. I am a Partner at Fieldfisher LLP ("**Fieldfisher**") and the solicitor with the 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 own 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 "**UKOP19**". 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 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**").

SERVICE OF THE ORDER AND THE AMENDED GLEESON ORDER

5. I make this witness statement in order to evidence 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.

6. I also make this witness statement in order to evidence 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.

Compliance with paragraph 6(a) and 9(a) of the Amended Gleeson Order

7. At 3:34pm on 5 January 2026, Jody Sanders of Fieldfisher, uploaded the Order to ukop.azurewebsites.net - /, being the web link as set out in the Amended Gleeson Order.

8. Also at 3:34pm on 5 January 2026, Jody Sanders of Fieldfisher, uploaded the Amended Gleeson Order to ukop.azurewebsites.net - /, being the web link as set out in the Amended Gleeson Order

9. A screenshot of the web link hosting the Order and the Amended Gleeson Order (and all previous documents that have been served in these proceedings) appears at UKOP19:3. **EB6 Tab 60: 228**

Compliance with paragraph 6(d) and 9(b) of the Amended Gleeson Order

10. On 7 January 2026 at 11:02 an email was sent by Cole Cannings of Fieldfisher to info@juststopoil.org, juststopoil@protonmail.com, and juststopoilpress@protonmail.com (UKOP19:4) and on the same date at 11:05 to xr-legal@riseup.net (UKOP19:5) confirming that: **EB6 Tab 57-58: 225-226**

    (a) the final injunctive relief granted by the Amended Gleeson Order and the Claimants' application to amend the Claim Form and Particulars of Claim to change the description of the Defendants and that the Amended Gleeson Order be amended to change the description of the Defendants accordingly (the "**Application**") were considered at the hearing which took place on 13 November 2025 before Master Kaye (the "**Hearing**");

(b) at the Hearing, the Court made no order as to the continuing effect of the Amended Gleeson Order and granted the Application; and

(c) a copy of the Order and the Amended Gleeson Order (copies of which were also attached to the email) can be found at ukop.azurewebsites.net - /.

11. Copies of the delivery receipts of these emails can be found at UKOP19:10-11, **EB6 Tab 65: 233-234**

12. At 11:06 on 7 January 2026, an automatically generated response was received from xr-legal@riseup.net with the subject line "Autoreply for XR Legal Support" and which confirmed that the XR Legal Support Team had received Fieldfisher's email referred to at paragraph 10 above and were "working on getting a response to you ASAP!". A copy of this email can be found at UKOP19:16. **EB6 Tab 59: 227**

13. On 7 January 2026 an email was sent by Cole Cannings of Fieldfisher to (i) youthdemand@proton.me and youthdemandpress@protonmail.com at 11:09 (UKOP19:6), (ii) on the same date to shut_the_system_info@proton.me at 11:12 (UKOP19:7), (iii) on the same date to campaigner@fossilfreelondon.org and operations@fossilfreelondon.org at 11:13 (UKOP19:8), and (iv) on the same date to press@citizensarrestnetwork.org and crew@citizensarrestnetwork.org at 11:16 (UKOP19:9) confirming that: **EB6 Tab 61-64: 229-232**

(a) Fieldfisher act for the Claimants in these proceedings and that by an order made by Mr Simon Gleeson (sitting as a Judge of the Chancery Division) on 6 October 2023 (i.e. the Amended Gleeson Order), the Court granted final injunctive relief to the Claimants in respect of Buncefield (Site 1) and Kingsbury (Site 2) as further described in Schedule 2 of that order;

(b) there shall be, on or around the anniversary of the Amended Gleeson Order (being 6 October each year), subject to Court availability a hearing to review the final injunction order with a time estimate of 2.5 hours plus reading time;

(c) the final injunctive relief granted by the Amended Gleeson Order and the Application were considered at the Hearing;

(d) at the Hearing, the Court made no order as to the continuing effect of the Amended Gleeson Order and granted the Application;

(e) a copy of the Order and the Amended Gleeson Order (copies of which were also attached), together with all the relevant documents in respect of the proceedings can be found at ukop.azurewebsites.net - /

14. Copies of the delivery receipts of these emails can be found at UKOP19:12-15. **EB6 Tab 65: 235-238**

Compliance with paragraph 6(b) of the Amended Gleeson Order

15. On the instructions of the Claimants' Solicitors, at approximately 14:00 on 22 December 2025, Doug Sidwick, being an employee of the British Pipeline Agency Limited (as agent for and on behalf of the Claimants) effected service of the Amended Gleeson Order by affixing a copy of the Order (including the Amended Gleeson Order) in clear envelopes on the perimeter fencing or gates at two prominent locations at Site 1, as shown in the photographs at UKOP19:17-18. **EB6 Tab 54: 162-163**

16. Further on the instructions of the Claimants' Solicitors, at between 11:00 and 11:25 on 24 December 2025, Alan Noble, being an employee of the British Pipeline Agency Limited (as agents for and on behalf of the Claimants) effected service of the Amended Gleeson Order by affixing a

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

copy of the Order (including the Amended Gleeson Order) in clear envelopes on the perimeter fencing or gates at two prominent locations at Site 2, as shown in the photographs at UKOP19:38-40. **EB6 Tab 55: 183-185**

Compliance with paragraph 6(c) of the Amended Gleeson Order

17. On the instructions of the Claimant's solicitors, between approximately 13:30 and 15:00 on 23 December 2025 and between 8:45 and 10:45 on 24 December 2025, Doug Sidwick, Rob Stockings and Robin Scott, being employees of British Pipeline Agency Limited (as agent for and on behalf of the Claimants) effected service of the site injunction notice in respect of Site 1 (in the form set out in Schedule 5 of the Amended Gleeson Order) by affixing copies of the notice in not less than A2 size in clearly visible locations (including at entranceways, access points, gates and attached to perimeter fencing) around and comprising part of Site 1, as more particularly shown in the photographs at UKOP19:19-37 and the map showing the location of Site 1 Notices at UKOP19:79. **EB6 Tab 54: 164-182** **EB6 Tab 56: 224**

18. Further on the instructions of the Claimant's solicitors, between approximately 7:00 and 10:00 on 24 December 2025, Darren Gilligan and Jake Sale, being employees of British Pipeline Agency Limited (as agent for and on behalf of the Claimants) effected service of the site injunction notice in respect of Site 2 (in the form set out in Schedule 6 of the Amended Gleeson Order) by affixing copies of the notice in not less than A2 size in clearly visible locations (including at entranceways, access points, gates and attached to perimeter fencing) around and comprising part of Site 2, as more particularly shown in the photographs at UKOP19:41-78 and the maps showing the location of Site 2 Notices at UKOP19:80-81. **EB6 Tab 55: 186-223** **EB6 Tab 53: 160-161**

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 by:
Signed: Antony Phillips 2AEF4626D58B472... Dated: 19 January 2026

Antony Douglas Phillips

Party: Claimant
Witness: John Michael Armstrong
Number: Eight
Exhibit: UKOP20
Dated: 16 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)

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

EIGHTH 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 1,000km of fuel pipes in the UK.

3. BPA acts as agent for the First Claimant, United Kingdom Oil Pipelines Limited ("**UKOP**") and the Second Claimant, West London Pipeline and Storage Limited ("**WLPSL**"), and it operates and maintains their UK based assets.

4. I am duly authorised to make this witness statement on behalf of the Claimants.

5. 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.

6. Produced and shown to me is a bundle of documents containing exhibit "**UKOP20**". Unless otherwise stated, page references in this witness statement refer to pages in that exhibit.

7. Unless otherwise stated, in this statement I adopt the definitions set out in my first witness statement dated 7 April 2022.

CURRENT POSITION

8. On 12 April 2022, Peter Knox QC (sitting as a Judge of the Chancery Division) granted an interim injunction to restrain the Defendants from trespassing, causing damage or removing equipment from the Sites and / or obstructing or otherwise interfering with the First Claimant's access over private access roads at the Sites (the "**Interim Injunction**"). On 21 April 2022, the Injunction was extended until 20 April 2023 (together, the "**April 2022 Orders**").

9. On 21 April 2023, the Injunction was extended by Order of The Honourable Mr Justice Rajah (the "**April 2023 Order"**), until:

   (a) 20 October 2023;

   (b) final determination of the claim; or

   (c) further claim in the interim.

10. On 6 October 2023, Mr Simon Gleeson (sitting as a Judge of the Chancery Division) granted an Order (the "**October 2023 Order**") for final injunctive relief to restrain the same activities prohibited by the Interim Injunction (the "**Final Injunction**").

11. It was also Ordered, pursuant to paragraph 12 of the October 2023 Order, that there shall be, on or around the anniversary of the October 2023 Order (being 6 October each year) a hearing to review the Final Injunction granted therein.

12. On 20 November 2024, at the first annual review of the October 2023 Order, by the Order of The Honourable Mr Justice Miles, the Final Injunction was continued (the "**November 2024 Order**").

13. Pursuant to the November 2024 Order:

    (a) any requirement in the April 2022 Orders and / or the April 2023 Orders on the Claimants to continue to fix copies of documents in clear transparent containers, by way of alternative service, was dispensed with;

    (b) paragraph 6(b) of the October 2023 Order was amended such that, prospectively, the Claimants be permitted to affix copies of the October 2023 Order in clear envelopes (in substitution for sealed transparent containers) to the perimeter fencing or gates at a minimum number of 2 prominent locations at each of the Sites; and

    (c) the November 2024 Order was to be served pursuant to the steps set out in paragraphs 9-11 of the October 2023 Order.

11. The second annual review of the October 2023 Order took place on 13 November 2025. By the Order of Master Kaye, the Final Injunction was continued, and the Claimants' application dated 24 October 2025 in relation to the description of the Defendants was granted (the "**November 2025 Order**").

12. Pursuant to the November 2025 Order:

    (a) the Claimants were permitted to amend the Claim Form and the Particulars of Claim to change the description of the First and Second Defendants (the "**Amended Claim Form and Particulars of Claim**");

    (b) service of the Amended Claim Form and Particulars of Claim was dispensed with;

    (c) the October 2023 Order was amended in the form appended at Schedule 2 to the November 2025 Order (the "**Amended October 2023 Order**");

    (d) the Amended October 2023 Order was to be notified to the First and Second Defendants in accordance with paragraphs 6 to 8 of the Amended October 2023 Order; and

    (e) the November 2025 Order was to be notified to the First and Second Defendants in accordance with paragraphs 9 to 11 of the Amended October 2023 Order

13. I make this further statement in connection with the third annual review hearing of the Final Injunction granted by the Amended October 2023 Order.

14. For the reasons I refer to below, the Claimants consider that the Final Injunction should remain in place until 23:59 hrs on 20 October 2028, subject to the annual reviews provided for at paragraph 12 of the Amended October 2023 Order.

15. This eighth witness statement supplements:

    (a) my first witness statement dated 7 April 2022 ("**First Witness Statement**");

    (b) my second witness statement dated 14 April 2022 ("**Second Witness Statement**");

    (c) my third witness statement dated 5 April 2023 ("**Third Witness Statement**");

(d) my fourth witness statement dated 6 July 2023 ("**Fourth Witness Statement**");

(e) my fifth witness statement dated 22 September 2023 ("**Fifth Witness Statement**");

(f) my sixth witness statement dated 4 November 2024 ("**Sixth Witness Statement**"); and

(g) my seventh witness statement dated 24 October 2025 ("**Seventh Witness Statement**")

together my "**Previous Witness Statements**".

16. The purpose of this eighth witness statement is to provide the Court with an update in respect of relevant events following the grant of the November 2025 Order and since my Seventh Witness Statement and, ultimately, to demonstrate the continuing threat posed by the Defendants. It therefore addresses:

(a) pertinent developments that evidence the continuing threat posed by the Defendants;

(b) evidence of action targeted at other operators and / or other organisations affiliated with the oil and gas sector; and

(c) evidence that shows that the Final Injunction has been successful in restraining individuals from potentially causing disruption to the Sites (as such term is defined in Schedule 2 of the Amended October 2023 Order).

NOTIFICATION OF THE NOVEMBER 2025 ORDER AND AMENDED OCTOBER 2023 ORDER

17. I have reviewed the Sixth Witness Statement of Antony Phillips dated 19 January 2026 and understand that steps were taken following the second annual review hearing to notify the Defendants of the November 2025 Order and Amended October 2023 in accordance with the terms of those orders. **HB Tab 31: 279-282**

DIRECT ACTION IN THE VICINITY OF SITE 1 AND SITE 2

18. In my First Witness Statement and Second Witness Statement, I addressed in detail the direct action suffered by the Claimants in respect of Site 1 and the direct action targeted at the operations of the Claimants in close proximity to Site 1 and Site 2. This direct action formed the basis for the Claimants seeking an initial interim order for pre-emptive injunctive relief. **HB Tab 14, 16: 152-168, 172-177**

19. In my Third Witness Statement, I addressed the further incidents of direct action in close proximity to Site 2 since the April 2022 Orders. **HB Tab 19: 187-197**

20. In my Sixth Witness Statement, I outlined that there had been no further direct action at, or in the vicinity of, Site 1 and Site 2 since the date of my Third Witness Statement. I refer to paragraphs 17 and 18 of my Sixth Witness Statement, which set out a number of factors which I believe contributed to the reduction in direct action in the vicinity of the Sites and refer further to paragraph 26 of my Seventh Witness Statement which outlines the earlier statement made by Just Stop Oil, suggesting that it planned to end disruptive protests **[UKOP17: pages 19-21].** I continue to believe that the Final Injunction has been the most significant factor in minimising the risk of a future trespass and / or interference occurring at either Site and remains the strongest deterrent against future direct action, the relief granted having proved successful to date. **HB Tab 26: 237-238** **HB Tab 29: 263**

21. At paragraph 19 of my Seventh Witness Statement, I outlined that the other factors which I believe contributed to the reduction in direct action in the vicinity of the Sites included the continuing **HB Tab 29: 262**

existence of an injunction order made by Mr Justice Sweeting in the King's Bench Division dated 9 May 2022 in favour of North Warwickshire Borough Council ("**NWBC**") (the "**NWBC Order**"). The NWBC Order protects the locality of the Kingsbury Oil Terminal (of which Site 2 forms part). I understand that at the second annual review of the NWBC Order heard on 7 October 2026, HHJ Emma Kelly noted that if individuals are minded to take direct action or other protest activity, the Kingsbury Oil Terminal (of which Site 2 forms part) would remain a prominent target. As a result, the NWBC Order has continued in full force and effect.

22. In light of the recent developments outlined in this statement, I believe that, if any of those factors I have referred to in my Previous Witness Statements were to be removed, the direct action would re-start, to the detriment of the Claimants and Site 1 and Site 2.

EVIDENCE OF ACTION BY JUST STOP OIL AND EXTINCTION REBELLION INCLUDING TARGETING OF OTHER OPERATORS AND AFFILIATED ORGANISATIONS FROM 24 OCTOBER 2025 TO 16 NOVEMBER 2026

23. Since the date of my Seventh Witness Statement, whilst there has been a marked change in the activities of Just Stop Oil, there continues to be activity targeted at industries and organisations that members of Just Stop Oil and / or Extinction Rebellion consider to be affiliated to the oil and gas industries. I have set out further detail of the activities of Just Stop Oil and Extinction Rebellion below.

JUST STOP OIL

24. On 27 March 2025, Just Stop Oil announced its plans to end disruptive protests and re-strategise its resistance efforts after a final demonstration on 26 April 2025 **[UKOP17: pages 19-21].** However, the extent to which Just Stop Oil had actually ceased its activities in the lead up to the second review hearing was unclear with a number of contradictory statements made on behalf of and / or by Just Stop Oil as outlined at paragraph 25 - 27 of my Seventh Witness Statement. Those previous statements suggested that the Just Stop Oil campaign was a continuing campaign notwithstanding the announcement of March 2025 which suggested that the group were "*hanging up the hi-vis*" and ceasing their activities **[UKOP17: pages 19-21]**. **HB Tab 29 : 263-264** **HB Tab 29 : 263-264**

25. At paragraph 27 of my Seventh Witness Statement, I referred to the fact that I was aware that the Court has been referred to the announcement by Just Stop Oil that it intended to stop disruptive protests in a number of recent cases where the continuation of injunctions against persons unknown including those affiliated or connected to the Extinction Rebellion, Just Stop Oil, and / or Insulate Britain campaigns had been sought. The judgments recorded that the Court determined in each case that the announcement by Just Stop Oil did not demonstrate that there was no longer a threat from Just Stop Oil or other environmental campaign group and that a real risk of unlawful activity would subsist if the respective injunctions did not remain in place. I referred, at paragraph 27(a) to (d) of my Seventh Witness Statement to the observations made by the Court in that regard and at paragraph 28 of my Seventh Witness Statement to a summary of the outcome of the hearings I referred to where the Court had determined that there remained a threat. At paragraph 29 of my Seventh Witness Statement, I also referred the Court to a number of statements made by activist members, including members of Just Stop Oil, where these members had acknowledged the utility of direct action and a willingness to do the same again. **HB Tab 29: 264** **HB Tab 29: 265** **HB Tab 29: 265-266**

26. As is evident from the making of the November 2025 Order, the Court was satisfied at the second annual review hearing that the announcement by Just Stop Oil did not demonstrate that there was no longer a threat from Just Stop Oil or other environmental campaign groups and a real risk of unlawful activity would subsist if the injunctions granted by the Court did not remain in place.

27. Following the making of the November 2025 order, further statements were made by Just Stop Oil suggesting a turning away from direct action. In particular, I understand, having reviewed the evidence published in relation to (*1) ESSO Petroleum Company, Limited and (2) Exxonmobil Chemical Limited v Persons Unknown*, that on 28 April 2026, Just Stop Oil issued a mass email to its members and followers stating that "*Just Stop Oil has hung up the hi-vis, but there's still plenty going on in the wider movement*" **[UKOP20: pages 5-6].** **EB6 Tab 16: 40-41**

28. Similarly, in an article published by Just Stop Oil on 17 July 2026, a Just Stop Oil spokesperson is quoted as saying "*Just Stop Oil may have ceased action but others are continuing the flight [sic] against the fossil fuel industry"* **[UKOP20: pages 7-9].** **EB6 Tab 30: 72-74**

29. Unfortunately, to the extent there was ever any intention to stop direct action, this appears to have been short-lived.

30. As at 31 August 2026, the Just Stop Oil website contained a new project alert referring to "Take Back Power" , suggesting that Just Stop Oil, or at least groups affiliated or linked to Just Stop Oil, remained active **[UKOP20: page 10].** **EB6 Tab 32: 77**

31. Furthermore, as at the date of this statement, under the "Donate" page of JSO's website, there are quotes from supporters including "*more protests are coming, buckle up*", "*disruption is part and parcel of protest, it is how you get attention"*, "*civil disobedience is our last and only hope*" and "*the next wave of rebellion is coming*" **[UKOP20: pages 11-19].** **EB6 Tab 41: 101-109**

32. On 2 September 2026, it was reported that around 60 Just Stop Oil supporters or members sat and lay in the road at Parliament Square, Westminster, during Andy Burnham's first appearance at Prime Minister's questions. That event led to traffic being brought to a halt as well as a number of arrests.

33. The Telegraph reported the events of 2 September 2026, with Cameron Ford, a spokesman for Just Stop Oil saying that the disruption was timed to coincide with Mr Burnham's first Prime Minsters Questions before he was "*deciding whether to have more oil and gas projects*" and that activists wanted to send a message that "*Just Stop Oil is back*" **[UKOP20: pages 20-23].** **EB6 Tab 33: 78-81**

34. The Just Stop Oil website itself includes an article in relation to the incident and states:

> *"60 people are blocking the road on Parliament Square, with a significant number glued on. There are a further 40+ people demonstrating in support from the pavement. The Metropolitan Police have begun to make arrests from the group blocking the road. It's expected that all will be arrested. One lane has been left free of glued-on action takers to permit access for emergency vehicles. Today's drastic actions have been taken in resistance to the possibility raised by Andy Burnham of drilling more oil and gas from the North Sea…".* **[UKOP20: pages 24-29].** **EB6 Tab 34: 82-87**

35. Just Stop Oil also confirmed a return to carrying out direct action via its own social media, stating and "*Today Just Stop Oil returned*" on 2 September 2026 (being the date of the protest activity outlined above) **[UKOP20: page 30].** **EB6 Tab 35: 88**

36. This recent action by Just Stop Oil indicates that the group has not ceased protest activity, remains active and is embarking on a new campaign effort in targeting the oil and gas industry (of which the Claimants are part) including protesting the possible authorisation of new oil and gas projects by the government.

37. Just Stop Oil's website also contains the following statement:

"*For fuck's sake Just stop oil! Think this summer was bad? It was just the start. Every new oil and gas project will make things worse. We do not consent to plans that will result in 3C of warming and mass death. If you feel the same, now is the time to resist. Exhausted firefighters, collapsing nurses and overheated bus drivers – we are all Just Stop Oil now. We are coming together to demand that the UK government stop licensing all new oil and gas projects and sign a Fossil Fuel Treaty to Just Stop Oil. Anything less is a death sentence".* **[UKOP20: pages 31-32]** **EB6 Tab 42: 110-111**

38. In addition, I understand that Just Stop Oil's website recently invited people to sign up to an online call to "*plan what happens next".* The entirety of JSO's opening page can be seen at **UKOP20: pages 33-34** but opens with the statement "*The choice is stark. Either we organise a rapid, fair transformation of society – or climate change forces chaotic, violent change upon us instead."* I understand from a review of Just Stop Oil's website that an online call was originally scheduled to be held at 10am on 3 October 2026, with a further online call then due to be held at 10am on 17 October 2026. **EB6 Tab 39: 98-99**

39. The recent activity by Just Stop Oil suggests that the original threat posed by those groups remains, notwithstanding the statement made in March 2025 and the other statements referred to at paragraphs 27 to 28 above.

40. I am aware that the Court has been referred to this point in a number of recent cases where the continuation of injunctions against persons unknown including those affiliated or connected to the Extinction Rebellion, Just Stop Oil, and / or other environmental campaigns have been sought. I have read the judgments in these cases which have been shared with me by the Claimants' instructed solicitors and the judgments record that in each case the Court has determined there remains a threat from Just Stop Oil or other campaign groups and it remains the position that a real risk of unlawful activity would subsist if the respective injunctions did not continue:

    (a) In *Various Airports v Persons Unknown* [2026] EWHC 2248 (KB) at paragraph 37 of the judgment dated 30 June 2026, the Court observed that "… *there continues to be a compelling need for these orders. The evidence does indeed demonstrate the deterrent effect of the injunctions. However, it does not follow that that there can be any relaxation against the continuing background of similar type of direct-action protests"* and that "*all the ingredients that were present for the original grant of the orders remain and all the arguments which justified those orders are still in place"* **[UKOP20: pages 35-48].** **EB6 Tab 50: 126-139**

    (b) In *London Southend Airport Ltd v Persons Unknown* [2026] EWHC 2249 (KB) at paragraph 39 of the judgment dated 2 July 2026, the Court noted that "…*the fact that the injunctions have been effective does not give any cause for relaxation*", and that "*In the event that they were to be lifted, I am quite satisfied that the real and imminent risk of serious harm would continue…"* and further that "*there has been no material change of circumstance and that there is no other reason in any of the circumstances of the case not to continue with the order*" **[UKOP20: pages 49-61].** **EB6 Tab 51: 140-152**

    (c) In *Gatwick Airport Ltd v Persons Unknown* [2026] EWHC 2251 (KB), the Court took a similar approach and confirmed at paragraph 11 of the judgment dated 17 July 2026 that "t*here is no material change of circumstance and that it is necessary, compellingly necessary, for the injunction to be continued"* **[UKOP20: pages 62-68].** **EB6 Tab 52: 153-159**

41. In summary, Just Stop Oil's recent activity suggests that the threat from JSO has not gone away. Instead, the group has gone through a resurgence and has resumed direct protest action targeted at the oil and fossil fuel industry, of which the Claimants are part.

EXTINCTION REBELLION

42. Extinction Rebellion remain a well-known protest group and a number of protests and incidents in the last year have taken place involving Extinction Rebellion, indicating that the group remains an active environmental protest group involved in direct action targeted against the oil and gas industry.

43. On 18 November 2025, it was reported that protestors from a coalition of climate movements led a march in Manchester, demanding the UK government honour its climate commitments. The demonstration was organised by Extinction Rebellion UK and other campaigners, as reported by Extinction Rebellion itself **[UKOP20: pages 69-72].** **EB6 Tab 3: 11-14**

44. On 21 November 2025, climate activists, which reportedly included members of Extinction Rebellion, scaled a Christmas tree gifted from Norway to London whilst it was being felled to protest against the Rosebank Oil field in the North Sea. Whilst the Rosebank oil field project does not directly relate to the Claimants or the Claimants' business activity, there is evidence of continuing use by Extinction Rebellion supporters of direct-action tactics to delay or disrupt and generate publicity **[UKOP20: page 73].** **EB6 Tab 4: 15**

45. On 26 November 2025, it was reported that Extinction Rebellion gathered on a Wimborne footbridge to display placards and publicly read climate change testimonies. The protest promoted anti-fossil fuel messaging, including calls for a global phase-out of fossil fuels and criticism of fossil fuel subsidies **[UKOP20: pages 74-76]**. **EB6 Tab 5: 16-18**

46. I understand from reviewing the evidence submitted as part of the *Shell* injunction reviews[1] that on 28 December 2025, an Extinction Rebellion protest group of approximately 35 demonstrators, accompanied by four members of the Red Rebel Brigade, passed through the Belvedere Road area as part of a march travelling from Westminster Bridge towards London Bridge. The group briefly gathered on Belvedere Road, with drummers and performers in red robes present, before continuing towards the Festival Hall.

47. On 20 January 2026, it was reported that Extinction Rebellion activists demonstrated outside Macquarie Group's London headquarters, criticising its majority ownership of Farnborough Airport and proposed increases to annual flight limits. Two protesters dressed as aircraft occupied the entrance canopy and displayed a banner calling for a ban on private jets and, importantly from the point of view of the Claimants, an end to fossil fuel investments **[UKOP20: page 77-78].** **EB6 Tab 8 - 9: 24-25**

48. On 29 June 2026, it was reported that protestors associated with Extinction Rebellion disrupted the launch of the University of Exeter's Climate and Environment Institute during the Exeter Climate Forum by staging a protest and occupying the stage. The protest targeted the forum's sponsorship by Howden, an insurance broker accused by campaigners of facilitating fossil fuel projects through insurance services. Activists used the event to criticise links between climate institutions and companies connected to the fossil fuel sector **[UKOP20: pages 79-83].** **EB6 Tab 26: 62-66**

49. On 14 September 2026, it was reported by Extinction Rebellion that its members had organised a protest march in central London demanding publication of the Government's unredacted National Security Assessment **[UKOP20: pages 84-87].** **EB6 Tab 37: 90-93**

[1] Shell International Petroleum Company Limited v Persons Unknown (as more particularly defined), Claim Number: QB-2022-001259; Shell U.K. Oil Limited v Persons Unknown (as more particularly defined), Claim Number QB-2022-001241, Shell U.K. Oil Products Limited v Persons Unknown (as more particularly defined), Claim Number: QB-2022-001420.

50. On 24 September 2026, it was reported that climate campaigners, including members of Extinction Rebellion and Green New Deal, protested and lobbied councillors during a meeting considering a motion to rescind Calderdale Council's 2019 climate emergency declaration. Two protesters interrupted proceedings and were removed by security **[UKOP20: pages 88-91].** **EB6 Tab 38: 94-97**

51. On 23 October 2026, it was reported that Extinction Rebellion protested at Albert Square, Manchester (the location of Andy Burham's offices) against Rosebank, holding signs saying "No New Fossil Fuels" **[UKOP20: page 92].** Again, whilst the Rosebank oil field project does not directly relate to the Claimants or the Claimants' business activity, the protest included wider messaging targeted at the fossil fuel industry. **EB6 Tab 40: 100**

52. Accordingly, there is evidence that both Just Stop Oil and Extinction Rebellion remain engaged in protest activity, including direct action, which is directly targeted at members of the oil and gas industry, with that activity increasing both in frequency and in severity since my Seventh Witness Statement. Furthermore, I am not aware of Just Stop Oil, Extinction Rebellion, or any other environmental group having provided any assurances or evidence to either the Court or the Claimants that the Sites will not be targeted again in the future.

OTHER ENVIRONMENTAL / CLIMATE CAMPAIGN GROUPS

53. As a result of the November 2025 Order, the definition of the Defendants included in the Amended October 2023 (and therefore subject to the Final Injunction) was widened to include members of other environmental campaigns. Therefore, in addition to Just Stop Oil and Extinction Rebellion, I set out below the activities of other protest groups who are targeting companies and organisations affiliated with the oil and gas industry.

FOSSIL FREE LONDON

54. Fossil Free London's website describes the group as one which "*disrupts and protests the fossil fuel industry"* **[UKOP20: page 93].** Their website also states that the group uses "*visible and disruptive protest actions to challenge fossil fuel corporations and their enablers here in London*" **[UKOP20: page 94]**. I recognise that this language, the group's name and the activities identified below indicate that London is presently the principal focus of its protest activity. Neither Site 1 nor Site 2 is situated in London. **EB6 Tab 43: 112** **EB6 Tab 44: 113**

55. However, the substantive objectives of Fossil Free London's campaigns are not confined to activities or projects located in London. The "*Campaigns*" section notes that Fossil Free London's campaigns include *"Our Anti Oil and Gas campaign strand works to counter key fossil fuel corporations (like Shell) and new oil & gas projects (like Rosebank)*". The Claimants are, of course, both prominent members of the oil industry **[UKOP20: pages 94-95]**. Rosebank, and the Jackdaw project which is also prominently opposed on the group's website, are North Sea developments outside London. The website describes the group as opposing new UK oil and gas and states that it is "*throwing everything*" at fighting Rosebank **[UKOP20: page 93]** **EB6 Tab 44: 113-114** **EB6 Tab 43: 112**

56. The website also demonstrates that Fossil Free London seeks to engage supporters beyond London. Its "*Get involved*" page separately addresses people "*Outside of London*", inviting them to join its mailing list and receive updates about its activity. **[UKOP20: pages 96-97]** It has also advertised for a full-time campaigner to deliver a 12-month protest-based campaign against a major oil company to deliver what is described as an "*active, far-reaching, and effective campaign*". **UKOP20: pages 98-100]**. Those matters indicate an organised capacity to research targets and mobilise supporters and mean that the risk cannot safely be assessed solely by reference to the word "London" in the group's name or the location of its activities to date. **EB6 Tab 47: 120-121** **EB6 Tab 49: 123-125**

57. In terms of its activities, on 5 November 2025, it was reported that at least 2 activists from Fossil Free London disrupted a BP speaker on the panel of a discussion hosted by the Association of International Energy Negotiators at Simmons & Simmons LLP's London office **[UKOP20: pages 101-102].** Fossil Free London also posted about the event on their own social media **[UKOP20: page 103].** **EB6 Tab 1: 8-9** **EB6 Tab 2: 10**

58. In addition, on 4 December 2025, it was reported that members of Fossil Free London disrupted the World Energy Council Assembly awards dinner at the Hilton Hotel in Mayfair, London. Protesters entered the event, where oil and gas industry representatives including nominees/attendees from Shell, BP and Ithaca Energy were present, and chanted "*no awards for climate criminals*" before being removed by security **[UKOP20: pages 104-105].** **EB6 Tab 6: 19-20**

59. On 13 February 2026, it was reported that Fossil Free London held a themed protest in St Dunstan's in the East ahead of the Government's decision on the Rosebank oil field. Participants dressed as couples and displayed placards including "*Stop Rosebank*," "*Save Me*," and "*Hot Earth*." The article reports that the group's director publicly called on the Government to reject new oil projects **[UKOP20: pages 106-107].** **EB6 Tab 11: 28-29**

60. Similarly, in February of 2026, Fossil Free London activists disrupted events held at hotels and bars hosting executives attending International Energy Week in London, as posted on the group's own social media. **[UKOP20: page 108].** **EB6 Tab 12: 30**

61. On 11 March 2026, Fossil Free London publicised a protest targeting Shell at the London Oceanology Conference, alleging that Shell has caused extensive environmental damage in the Niger Delta and has failed to adequately "*clean up*" pollution from historic oil operations **[UKOP20: page 109-110].** **EB6 Tab 14: 34-35**

62. On 5 May 2026, it was reported that Fossil Free London staged a protest outside the London offices of Equinor ahead of oil and gas Q1 profits announcement. Activists piled life-sized body bags outside the offices of Equinor, as one campaigner dressed as an executive stood on top of them **[UKOP20: pages 111-112].** **EB6 Tab 18: 46-47**

63. On 6 May 2026, Fossil Free London protested outside Shell's headquarters ahead of quarterly profits which were due to be announced on 7 May 2026. It was reported that the protest included a demonstration with bloody petrol pumps **[UKOP20: pages 113-114]** and the protest was also posted on the group's social media accounts **[UKOP20: pages 115].** **EB6 Tab 19: 48-49** **EB6 Tab 20: 50**

64. On 18 May 2026, climate activists gathered around Shell's headquarters on the day of the annual general meeting demanding justice for the Philippines and Niger Delta. Social media posts from Fossil Free London stated *"We're outside Shell HQ on the day of their AGM with a clear message: it's the world v Shell!*! **[UKOP20: page 116].** **EB6 Tab 23: 54**

65. On 27 May 2026, it was reported that Fossil Free London staged a stunt outside a supermarket in Hackney to draw attention to cost of living and oil/gas prices soaring. I understand that this involved campaigners dressed as oil executives filled with sacks of money. There were also reportedly placards stating *'Shell profits. We pay the price*"**[UKOP20: pages 117-120].** **EB6 Tab 24: 55-58**

66. On 1 April 2026, it was reported that activists campaigned outside the US Embassy in London in response to the increase in oil company profits in the wake of the war in Iran. Two activists were tied with life sized petrol pumps branded Rosebank **[UKOP20: pages 121-124].** **EB6 Tab 15: 36-39**

67. On 8 July 2026, Fossil Free London announced its new campaign "London Calling" which suggests that "*In the face of this crisis Fossil Free London are planning something big - but we need you to make it happen*" suggesting that a further campaign is due to be deployed by the group **[UKOP20: page 125-128]** **EB6 Tab 27: 67** **EB6 Tab 45: 115-117**

68. On 9 July 2026, Fossil Free London campaigners protested inside the QEII Centre in Westminster "*to demand that they: stop hosting oil*". In a social media post from Fossil Free London, the group stated that "*They willingly allow Shell, Exxon, as well as weapons manufacturing corporations to meet in their venue*" **[UKOP20: page 129].** **EB6 Tab 28: 68**

69. On 16 July 2026, Fossil Free London campaigners again protested inside the QEII Centre in Westminster while the venue hosted its annual Summer Showcase. It was reported that five campaigners entered the event and made speeches stating "*Did you know the QEII Centre is one of the biggest hosts of the fossil fuel companies in London? They line the pockets of the oil and gas industry. They have blood on their hands and their pocked are lined with oily money"* **[UKOP20: pages 130-132]**. **EB6 Tab 29: 69-71**

70. On 29 July 2026, it was reported that Fossil Free London protestors had gathered at Shell's headquarters and held signs stating "DON'T POUR OIL ON THE FIRES" and "SHELL FUELS WILDFIRES" "SHAME ON SHELL" **[UKOP20: pages 133-134].** **EB6 Tab 31: 75-76**

71. On 5 September 2026, Fossil Free London staged a major demonstration outside Parliament against reports that the Jackdaw gas field would be approved, as publicised on its own social media. Activists carried banners reading "*Jackdaw: Burnham's betrayal*" and "*No More Planet Wrecking Fossil Fuels".* Jackdaw is a reference to the major North Sea gas and condensate development and is not directly related to the Claimants or the Claimants' business activity but is linked to the oil and gas industry generally **[UKOP20: page 135].** **EB6 Tab 36: 89**

72. Taken together, the matters above demonstrate sustained hostility towards the oil and gas industry generally, including named corporations and projects situated outside London; a stated commitment to visible and disruptive action; and a willingness to enter and disrupt venues associated with that industry. I recognise that the examples identified above took place in London and that I have not yet come across evidence of Fossil Free London itself carrying out direct action at an operational oil or gas site outside London. I nevertheless consider its activities relevant to the assessment of risk because its campaigns concern UK-wide oil and gas projects and companies whose operations and assets are not confined to London, and because its website demonstrates the ability to organise planned actions and communicate with supporters outside London.

CUT THE TIES TO FOSSIL FUELS

73. Cut the Ties to Fossil Fuels' donation site "Chuffed" remains active and states:

> "*Now as an independent, autonomous campaign, Cut The Ties To Fossil Fuels will be able to work with a broader spectrum of other activist groups and movements, whilst remaining agile and focusing on our core belief in non violent direct action. We only do direct action*." Cut the Ties to Fossil Fuels therefore remains active **[UKOP20: pages 136-137]** **EB6 Tab 46: 118-119**

74. On 10 December 2025, it was reported that Cut The Ties To Fossil Fuels staged a protest at a business on Three Field Lane, Southampton, displaying banners including "*cut the ties to carbon pollution*". Police attended following reports of the protest and arrested one protester. Hampshire

Police stated that officers were balancing the rights of lawful protest with the rights of others to avoid unacceptable disruption, with public safety as the priority **[UKOP20: pages 138-140]** **EB6 Tab 7: 21-23**

75. Cut the Ties to Fossil Fuels has also been reported as involved in the protest of 20 January 2026 outside the Macquarie Group headquarters in London referred to at paragraph 47 of this statement, positioning themselves in front of the main entrance and holding banners that urged the company to cut ties with fossil fuels. I understand from the reports that Extinction Rebellion activists were present and at least one individual was arrested. **[UKOP20: pages 77-78]** **EB6 Tab 8-9: 24-25**

76. On 27 May 2026, it was reported that protestors aligned with Cut the Ties to Fossil Fuels had targeted Federated Hermes (an Investor in Total Energies, in turn a majority shareholder in the East Africa Crude Oil Pipeline) **[UKOP20: pages 141-143].** This involved entering the lobby of Federated Homes to display banners, painting windows with slogans and setting off smoke flares. The same action appears to be advertised on the Action Network Website requesting "*the usual support crew"* **[UKOP20: page 144]** **EB6 Tab 25: 59-61** **EB6 Tab 48: 122**

OTHER GROUPS

77. In addition to the specific activity of the groups I have outlined above, I understand that there are additional groups continuing to target the oil and gas industry as set out below:

(a) On 23 January 2026, it was reported that climate protesters had disrupted and caused an evacuation at the Fitch Ratings Insurance Insights 2026 conference in London the previous day. The protesters called on the UK insurance sector to stop supporting the fossil fuel industry and held up placards stating "*No New Workers for Fossil Fuel Insurers*" **[UKOP20: pages 145-146].** **EB6 Tab 10: 26-27**

(b) On 19 February 2026, it was reported that Christian Climate Action protested against Rosebank, holding a 24 hour prayer vigil outside St Paul's in London. The activists left white sheets in front of the steps of St Pauls with tombstones art their feet to represent people around the world dying due to climate impact **[UKOP20: pages 147-149].** **EB6 Tab 13: 31-33**

(c) On 7 May 2026, it was reported that Greenpeace activists had projected photos across buildings displaying alleged sources of Shell's profits and claiming "*They Profit We Pay*" "*War Profits HQ*" "*War profiteers*" **[UKOP20: pages 150-152].** **EB6 Tab 21-22: 51-53**

(d) I understand from reviewing the evidence submitted as part of the *Shell* injunction review that on 21 April 2026, ten protestors arrived at the Shell Centre Tower in London and refused to disclose details of the group they belong to (though it was submitted to the Court that many were believed to be from Fossil Free London). Two protestors sat on Jubilee walls. The remaining eight gathered around a beach ball with a world map drawn on it. One protestor repeatedly hit the beach ball with a baseball bat until it burst, releasing a sticky red paint-like substance.

(e) On 28 April 2026, it was reported that Climate activists forced the chair of NatWest to halt its annual general meeting after the bank disclosed in February that it had loosened restrictions imposed on financing of clients' fossil fuel activities. A few minutes into the AGM, nine protestors wearing shirts with slogan "*No more Oil*" stood and began singing. It was reported that the activists may have been members of Extinction Rebellion splinter group, XR Money Rebellion **[UKOP20: pages 153-156].** **EB6 Tab 17: 42-45**

OTHER INJUNCTION PROCEEDINGS

78. The only updates to my knowledge in relation to:

(a) The injunctions granted to, or in relation to, oil and gas companies regarding direct action against the industry, as set out at paragraph 45 of my Fourth Witness Statement, paragraph 28 of my Fifth Witness Statement, paragraph 59 of my Sixth Witness Statement, and paragraph 34 of my Seventh Witness Statement are as follows:

Claim Number	Property	Claimant(s)	Duration of injunction
QB-2022-001259	Shell Centre Tower	Shell International Petroleum Company Limited	Final injunction granted on 3 December 2024 until 23:59 on 3 December 2029 subject to annual review on each year. At the second reviewing hearing on 15 October 2026, Mr Justice Richie held that the injunction should continue in full force an effect pending future review and subject to a number of amendments.
QB-2022-001241	Shell Haven Site	Shell UK Limited	Final injunction granted on 3 December 2024 until 23:59 on 3 December 2029 subject to annual review on each year. At the second reviewing hearing on 15 October 2026, Mr Justice Richie held that the injunction should continue in full force an effect pending future review and

			subject to a number of amendments.
QB-2022-001420	Petrol filling station	Shell UK Oil Products Limited	Final injunction granted on 3 December 2024 until 23:59 on 3 December 2029 subject to annual review on each year. At the second reviewing hearing on 15 October 2026, Mr Justice Richie held that the injunction should continue in full force an effect pending future review and subject to a number of amendments.
QB-2022-001098	Fawley Petrochemical Complex, Hythe Terminal, Avonmouth Terminal, Birmingham Terminal, Purfleet Terminal, West London Terminal, Hartland Park Logistics Hub and Alton compound at Holybourne	Esso Petroleum Company Limited and Exxonmobil Chemical Limited	Final injunction granted on 29 January 2024 until 11 July 2028 subject to annual review on 18 July of each year. At the second review hearing on 22 July 2026, Mrs Justice Tipples held that the injunction should continue in full force an effect pending future review and subject to a number of amendments.
QB-2022-000904	Pembroke oil refinery and jetties, Manchester oil terminal, Kingsbury oil terminal, Plymouth oil terminal, Cardiff terminal, Avonmouth terminal and Pembrokeshire terminal	Valero Energy Ltd, Valero Logistics UK Ltd and Valero Pembrokeshire Oil Terminal Ltd	Final injunction granted until 13 December 2028 or further order in the meantime following a hearing on 17 January 2024.

			On the second annual review on 16 February 2026, Mrs Justice Lambert DBE held that the injunction should continue in full force and effect pending further future review. The next review of this injunction will be heard in early 2027.
QB-2022-001236	Oil terminal known as Kingsbury Oil Terminal, Kingsbury, Warwickshire	North Warwickshire Borough Council	Final injunction granted until 6 September 2027. At the second reviewing hearing on 7 October 2026, HHJ Kelly held that the injunction should remain in full force and effect until its expiry.

(b) The updates to injunctions obtained by parties against persons unknown including those affiliated or connected to the Extinction Rebellion, Just Stop Oil, and / or Insulate Britain campaigns as previously set out at paragraph 46 of my Fourth Witness Statement are as follows:

HB Tab 21: 201-202

Claim Number	Property/Land	Claimant(s)	Duration of injunction
QB-2021-003841	Multiple A roads, bridges and tunnels in London	Transport for London	Final injunction until 2 May 2028. At the review hearing in November 2025, the Claimant indicated that it would not seek

			continuation of the injunction.
KB-2022-003542	Multiple Roads, bridges and tunnels in London	Transport for London	Final injunction until 2 May 2028. At the review hearing in November 2025, the Claimant indicated that it would not seek continuation of the injunction
KB-2024-002210	Heathrow Airport	Heathrow Airport Limited	Final injunction granted until July 2029, subject to review. At the most recent review hearing in July 2026, the Court upheld the injunction.
KB-2024-002336	Gatwick Airport	Gatwick Airport Limited	Final injunction granted until July 2029, subject to review. At the most recent review hearing in July 2026, the Court upheld the injunction.
KB-2024-001765	London City Airport	London City Airport Limited and Docklands Aviation Group Limited	Injunction granted on 20 June 2024 until 20 June 2029, final determination or further order in the meantime. At the most recent review hearing in June 2026, the Court upheld the injunction.

KB-2024-002132	London Stansted Airport, Manchester Airport and East Midlands International Airport	Manchester Airport PLC, Airport City (Manchester) Ltd, Manchester Airport Car Park Limited, Stansted Airport Ltd and East Midlands International Airport Ltd	Injunction granted on 5 July 2024 with immediate effect. At the most recent review hearing in June 2026, the Court upheld the injunction.
KB-2024-002473	Bristol Airport and Liverpool Airport	Birmingham Airport Limited, Liverpool Airport Limited, Peel L&P Investments (North) Limited, Bristol Airport Limited, South West Airports Limited and Bristol Airport Developments Limited	Injunction granted on 6 August 2024 with immediate effect. At the most recent review hearing in June 2026, the Court upheld the injunction.
KB-2024-002317	Leeds Airport, London Luton Airport and Newcastle International Airport	Leeds Bradford Airport Limited, London Luton Operations Limited, Newcastle International Airport Limited and Nial Services Limited	Injunction granted on 19 July 2024 with immediate effect. At the most recent review hearing in June 2026, the Court upheld the injunction.
KB-2024-002596	London Southend Airport	London Southend Airport Company Limited, London Southend Solar Limited and Thames Gateway Airport Limited	Injunction grated on the 14 August 2024 until 14 August 2029. At the most recent review hearing in July 2026, the Court upheld the injunction.

SUMMARY

79. The evidence set out above, as well as that in my Previous Witness Statements, demonstrates that there continues to be a significant active threat posed by Just Stop Oil, Extinction Rebellion,

as well as other environmental campaign groups, and which continues to target those affiliated with the oil and gas industry.

80. It is clear that a number of environmental campaign groups, including Just Stop Oil, have increased their protest activity against the oil and gas industry despite previous suggestions that direct action had ceased.

81. At paragraph 58 of my Sixth Witness Statement and paragraph 36 of my Seventh Witness Statement, I set out why the targeting of airports is a concern for the Claimants and why the continuation of the injunctions noted at paragraph 78(b) remains of critical importance to the Claimants. In particular, the terminal at Site 1 is an important fuel source to the British aviation industry, providing aircraft fuel for local airports including Gatwick, Heathrow and Luton airports. It is therefore of key strategic importance to the UK as a key hub in the distribution of fuel for aviation and Heathrow, Gatwick and Luton airports depend on supplies from the Site 1 terminal to maintain operations. In addition, the terminal at Site 2 is also of key strategic importance to the UK as it provides aviation kerosene to the Midlands airports. **HB Tab 26: 244** **HB Tab 29: 271**

82. As referred to at paragraph 55 of my Third Witness Statement, paragraph 48 of my Fourth Witness Statement and paragraph 61 of my Sixth Witness Statement, given the importance of the Sites covered by the Final Injunction, the continuing action and / or threat of action by Just Stop Oil and Extinction Rebellion and other environmental campaigns, and the highly disruptive and inherently dangerous effect of the protesting techniques used by those groups, I continue to believe that in the absence of the final injunctive relief under the Final Injunction continuing, there is a real risk of imminent trespass and / or interference with the private access routes in relation to the Sites. This was the conclusion reached by HHJ Emma Kelly when continuing the NWBC Order in relation to Kingsbury Oil Terminal (of which Site 2 forms part), as she noted the Terminal would remain a prominent target if individuals are minded to take direct action or other protest activity (thereby recognising the threat posed to Site 2). **HB Tab 19: 196** **HB Tab 22: 214** **HB Tab 26: 248**

83. The Final Injunction continues to have a deterrent effect, and its impact (as well as that of Orders of a similar nature granted to other oil and gas operators) on deterring unlawful protestor activity on sites owned by oil and gas operators has been referred to by both Just Stop Oil and Extinction Rebellion, as outlined at paragraph 62 of my Sixth Witness Statement. **HB Tab 19: 31: 248**

PROCEEDINGS

84. The Claimants' solicitors have confirmed to me that no acknowledgment of service, admission or defence has been received on behalf of any Defendant to these proceedings since my Seventh Witness Statement (or at all). The Claimants' solicitors have also confirmed to me that no Defendant has ever engaged with these proceedings.

CONCLUSION

85. For the reasons set out in this statement and the Previous Witness Statements, I respectfully request that the Final Injunction granted by the Amended October 2023 Order continues in full force and effect.

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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: John Armstrong 6E140BA83F324D9... Dated: 16 November 2026

John Michael Armstrong

Party: Claimant
Witness: Antony Douglas Phillips
Number: Seventh
Exhibit: UKOP21
Dated: 17 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 CAMPGAIGN, 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, 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

SEVENTH WITNESS STATEMENT OF ANTONY DOUGLAS PHILLIPS

I, Antony Douglas Phillips, of Riverbank House, 2 Swan Lane, London, EC4R 3TT will say as follows:

1. I am a Partner at Fieldfisher LLP ("**Fieldfisher**") and the solicitor with the 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 own 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 "**UKOP21**". 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 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 (the "**Amended Gleeson Order**").

SERVICE OF NOTICE OF HEARING AND COURT DOCUMENTS

5. I make this witness statement to evidence the Claimants' compliance with paragraph 9 of the Amended Gleeson Order in serving the following documents on the Defendants:

   (a) **Notice**: the Notice of Hearing dated 14 October 2026;

   (b) **Court Documents**:

      (i) Eighth Witness Statement of John Michael Armstrong dated 16 November 2026;

      (ii) Exhibit UKOP20;

      (iii) Draft Order; and

      (iv) Sixth Witness Statement of Antony Douglas Phillips dated 19 January 2026 and accompanying Exhibit, UKOP19.

Compliance with paragraph 9(a) of the Amended Gleeson Order

6. At 15:58 on 16 October 2026, Jody Sanders of Fieldfisher, the Claimants' solicitors, uploaded the Notice to ukop.azurewebsites.net - /, being the web link specified in the Amended Gleeson Order.

7. Between 13:24 and 13:31 on 16 November 2026, Jody Sanders of Fieldfisher, uploaded the Court Documents to ukop.azurewebsites.net - /.

8. A screenshot of the web link page hosting the Notice and the Court Documents (and all previous documents that have been served in these proceedings) appears at **UKOP21: page 4.**

EB6 Tab 95: 268

Compliance with paragraph 9(b) of the Gleeson Order

9. On 16 October 2026, Cole Cannings of Fieldfisher sent an email to the email addresses at the times listed below confirming that the Court had issued the Notice which states that the hearing to review the Amended Gleeson Order has been listed in a three-day window from 1 December 2026 with a time estimate of half a day (the "**Hearing**") and that a copy of the Notice could be found at the following weblink: https://ukop.azurewebsites.net:

(a) juststopoil@protonmail.com, info@juststopoil.org, and juststopoilpress@protonmail.com at 17:16 on 16 October 2026 (**UKOP21: page 5**); **EB6 Tab 66: 239**

(b) xr-legal@riseup.net at 17:17 on 16 October 2026 (**UKOP21: page 6**); **EB6 Tab 67: 240**

(c) youthdemand@proton.me and youthdemandpress@protonmail.com at 17:18 on 16 October 2026 (**UKOP21: page 7**); **EB6 Tab 68: 241**

(d) shut_the_system_info@proton.me at 17:19 on 16 October 2026 (**UKOP21: page 8**); **EB6 Tab 69: 242**

(e) campaigner@fossilfreelondon.org and operations@fossilfreelondon.org at 17:19 on 16 October 2026(**UKOP21: page 9**); and **EB6 Tab 70: 243**

(f) press@citizensarrestnetwork.org and crew@citizensarrestnetwork.org at 17:19 on 16 October 2026 (**UKOP21: page 10**); **EB6 Tab 71: 244**

10. Copies of the delivery receipts in respect of the emails referred to at paragraph 9 of this statement can be found at **UKOP21: pages 11-16** **EB6 Tab 72 - 77: 245 - 250**

11. At 17:17 on 16 October 2026, an automatically generated response was received from xr-legal@riseup.net with the subject "Autoreply for XR Legal Support" and which confirmed that the XR Legal Support Team had received Fieldfisher's email referred to at paragraph 9(b) above and "*was working on getting a response to you ASAP!*". A copy of this email can be found at **UKOP21: page 17.** **EB6 Tab 78: 251**

12. At 17:19 on 16 October 2026, an automatically generated response was received from campaigner@fossilfreelondon.org with the subject "*Away on holiday…*" and which confirmed that the Fossil Free London team would "*get back to [Fieldfisher] as soon as I can*" in response to the email referred to at paragraph 9(e) above. A copy of this email can be found at **UKOP21: page 18.** **EB6 Tab 79: 252**

13. On 16 November 2026, an email was sent by Cole Cannings of Fieldfisher to the email addresses and at the times listed below at paragraph 14 confirming that in advance of the Hearing:

(a) the Claimants had filed further evidence for the Hearing at Court in accordance with paragraph 13 of the Amended Gleeson Order;

(b) copies of the Court Documents can be found at https://ukop.azurewebsites.net;

(c) any individual who wishes to come forward to defend the proceedings is entitled to file a skeleton argument not less than 3 days before the date of any hearing;

(d) We (i.e. Fieldfisher) are authorised to accept service for and on behalf of the Claimants and that service of any evidence or skeleton arguments can be affected by emailing the relevant documents to UKOPinjunction@fieldfisher.com.

14. The email addresses and the corresponding time of each email sent by Cole Cannings of Fieldfisher referred to at paragraph 13 of this statement are as follows:

(a) juststopoil@protonmail.com, info@juststopoil.org, and juststopoilpress@protonmail.com at 15:06 on 16 November 2026 (**UKOP21: page 19**); **EB6 Tab 80: 253**

(b) xr-legal@riseup.net at 15:07 on 16 November 2026 (**UKOP21: page 20**); **EB6 Tab 81: 254**

(c) youthdemand@proton.me and youthdemandpress@protonmail.com at 15:08 on 16 November 2026 (**UKOP21: page 21**); **EB6 Tab 82: 255**

(d) shut_the_system_info@proton.me at 15:08 on 16 November 2026 (**UKOP21: page 22**); **EB6 Tab 83: 256**

(e) campaigner@fossilfreelondon.org and operations@fossilfreelondon.org at 15:09 on 16 November 2026 (**UKOP21: page 23**); and **EB6 Tab 84: 257**

(f) press@citizensarrestnetwork.org and crew@citizensarrestnetwork.org at 15:10 on 16 November 2026 (**UKOP21: page 24**); **EB6 Tab 85: 258**

15. Copies of the delivery receipts in respect of the emails referred to at paragraph 14 of this statement can be found at **UKOP21: pages 25-32** **EB6 Tab 86 - 93: 259 - 266**

16. At 15:08 on 16 November 2026, an automatically generated response was received from xr-legal@riseup.net with the subject "Autoreply for XR Legal Support" and which confirmed that the XR Legal Support Team had received Fieldfisher's email referred to at paragraph 14(b) above and "*was working on getting a response to you ASAP!*". A copy of this email can be found at **UKOP21: page 32.** **EB6 Tab 94: 267**

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: 17/11/2026.....

Antony Douglas Phillips

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

Certificate of service

Name of court	Claim No.
HIGH COURT OF JUSTICE, BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES, CHANCERY DIVISION PROPERTY TRUSTS AND PROBATE LIST	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, 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 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, 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 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)

On what day did you serve? 0 7 / 0 1 / 2 0 2 6

The date of service is 0 7 / 0 1 / 2 0 2 6

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

Order of Master Kaye dated 13 November 2025 (the "**Order**")

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

The First and Second Defendants pursuant to paragraph 9 of the Order of Mr Simon Gleeson (sitting as a Judge of the Chancery Division) dated 6 October 2023 as amended by the Order (the "**Amended Gleeson 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)*

[X] by other means permitted by the court

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

Service was effected:

(a) on the web link specified in paragraph 9(a) of the Amended Gleeson Order (https://ukop.azurewebsites.net);
(b) at the email addresses specified in paragraph 9(b) of the Amended Gleeson Order:
(i) xr-legal@riseup.net;
(ii) juststopoilpress@protonmail.com;
(iii) info@juststopoil.org;
(iv) juststopoil@protonmail.com
(v) youthdemand@proton.me;

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

(please specify)

Pursuant to paragraph 6 of the Order and in accordance with paragraphs 9 to 11 of the Amended Gleeson Order:

1. Service of the Order was effected at 15:34 on 5 January 2026 by uploading the Order to https://ukop.azurewebsites.net. A copy of the web link page is at **Appendix 1** to this certificate of service.

2. Service of the Order was further effected on 7 January 2026 by an email being sent to the following email addresses at the times specified below:

info@juststopoil.org, juststopoil@protonmail.com, & juststopoilpress@protonmail.com at 11:02

xr-legal@riseup.net at 11:05

youthdemand@proton.me and youthdemandpress@protonmail.com at 11:09

shut_the_system_info@proton.me at 11:12

campaigner@fossilfreelondon.org & operations@fossilfreelondon.org at 11:13; and

press@citizensarrestnetwork.org & crew@citizensarrestnetwork.org at 11:16

setting out that a copy of the Order, together with all relevant documents in respect of the Order and the proceedings can be found at the following link: https://ukop.azurewebsites.net and attaching a copy of the Order.

Copies of the emails are at **Appendix 2** to this certificate of service. Copies of the delivery receipts and the automatic reply received from xr-legal@riseup.net are at **Appendix 3** to this certificate of service.

[ ] 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)*

(vi) youthdemandpress@protonmail.com;
(vii) shut_the_system_info@proton.me;
(viii) campaigner@fossilfreelondon.org;
(ix) operations@fossilfreelondon.org;
(x) press@citizensarrestnetwork.org; and
(xi) crew@citizensarrestnetwork.org.

Being the [ ] claimant's [X] 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
[X] other *(please specify)*

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

Full name: ANTONY DOUGLAS PHILLIPS

Signed: Signed by: Antony Phillips 2AEF4626D58B472... (Claimant) (~~Defendant~~) ('s solicitor) (~~'s litigation friend~~)

Position or office held: Partner (If signing on behalf of firm or company)

Date: 19 01 2026

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.

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APPENDIX 1

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

ukop.azurewebsites.net - /

4/13/2022	9:01 AM	270368 (2022.04.08) Final Note from Injunction Hearing dated 08 April 2022 - 103362492_1.PDF
4/25/2022	4:16 PM	304635 (2022.04.25) Claimants_ Solicitors Note of Return Date Injunction Hearing dated 20 April 2022 - 103566927_1.PDF
10/27/2025	3:09 PM	232235 Application Notice dated 24.10.25 - Claimant's Application to amend description of Defendants.pdf
4/5/2023	3:45 PM	3468912 Application notice- dated 04.04.23- for return hearing on 20.04.23 - 110797879_1.pdf
11/4/2024	4:41 PM	153722 Application notice- dated 04.11.24- for review of final injunction Order 2024.pdf
4/19/2022	3:23 PM	84022730 Bundle 1 of 2 for Return Date Hearing on 20 April 2022 (comprising the Bundle for Interim Injunction Hearing on 8 Apr
4/19/2022	3:24 PM	90211815 Bundle 2 of 2 for Return Date Hearing on 20 April 2022 (as updated on 19 April 2022) - 103442287_1.pdf
9/29/2023	3:50 PM	4149429 Bundle of Authorities for Application for Summary Judgment.pdf
11/14/2024	4:18 PM	4091146 Bundle of Authorities for Hearing of the Review of the Final Injunction Order 2024.pdf
4/17/2023	11:26 AM	2325296 Bundle of Authorities for Return Date Hearing on 20 April 2023.pdf
9/29/2023	3:50 PM	68020 Claimant's skeleton argument for Application for Summary Judgment.docx
4/14/2022	3:00 PM	389745 Claimant's skeleton argument for return date hearing on 20.4.2022.pdf
11/14/2024	4:18 PM	252793 Claimants Skeleton Argument for Hearing of the Review of the Final Injunction Order 2024.pdf
11/5/2025	1:59 PM	246455 Claimants' Skeleton Argument dated 5.11.25.pdf
4/17/2023	11:26 AM	189540 Claimants' Skeleton Argument for Return Date Hearing on 20 April 2023.pdf
4/8/2022	7:45 PM	887760 Defendant Response Pack - 103297040_1.pdf
11/4/2024	4:41 PM	19227 Draft Order - dated 04.11.24- for review of final injunction Order 2024.docx
10/27/2025	3:09 PM	2531562 Draft Order for Claimant's Application dated 24.10.25.pdf
7/10/2023	4:44 PM	1566913 Draft Order for Claimants Summary Judgment Application dated 7 July 2023 - 112689563_1.PDF
4/8/2022	7:28 PM	1061012 Draft Order for Return Date Hearing (08.04.2022) - 103296915_1.DOCX
4/5/2023	3:47 PM	1724018 Draft Order for Return Date Hearing on 20.04.23 - dated 04.04.23 - 110800165_1.pdf
7/11/2023	10:09 AM	7660669 Exhibit UKOP10 - 112418041_1.pdf
9/27/2023	11:37 AM	3163596 Exhibit UKOP11 - 112805652_1.pdf
9/27/2023	1:50 PM	64090567 Exhibit UKOP12 - 114360329_1.pdf
11/4/2024	4:47 PM	126110953 Exhibit UKOP14.pdf
10/27/2025	3:09 PM	53427720 Exhibit UKOP17.pdf
11/3/2025	2:34 PM	3072121 Exhibit UKOP18.pdf
4/5/2023	3:51 PM	88150000 Exhibit UKOP6 - 110755402_1.pdf
4/5/2023	3:52 PM	397591 Exhibit UKOP7 - 110744707_1.pdf
7/11/2023	10:09 AM	76198598 Exhibit UKOP9 - 112555309_1.pdf
11/3/2025	2:34 PM	255910 Fifth Witness Statement of Antony Douglas Phillips dated 31.10.25.pdf
9/27/2023	11:37 AM	287645 Fifth Witness Statement of John Michael Armstrong dated 22 September 2023 - 114373547_1.pdf
10/13/2023	11:02 AM	1014976 Final Sealed Order dated 12 October 2023 in relation to the application for summary judgment.pdf
4/21/2022	9:30 AM	1515942 Final Sealed Order for Return Date Hearing - (20.04.2022) - 103487582_1.PDF
9/27/2023	11:37 AM	259226 First Witness Statement of Antony Douglas Phillips dated 24 July 2023 - 113030926_1.pdf
4/8/2022	7:28 PM	4712019 First Witness Statement of Daniel Owen Christopher Talfan Davies dated 8 April 2022 together with Exhibit UKOP3 - 103
7/10/2023	4:44 PM	404212 Fourth Witness Statement of John Armstrong dated 6 July 2023 - 112644075_1.PDF
9/22/2025	4:37 PM	120670 Notice of Appointment to Fix A Date For Hearing - dated 18 September 2025.pdf
10/8/2024	10:29 AM	1048540 Notice of appointment to fix a date for the hearing dated 2 October 2024.pdf
10/23/2024	10:00 AM	127180 Notice of Hearing Date dated 23 October 2024.pdf
10/1/2025	8:28 AM	93925 Notice of Hearing dated 29 September 2025.pdf
10/4/2023	11:14 AM	529121 Notice of Hearing from Claimant's Application for Summary Judgment dated 3 October 2023.pdf
9/27/2023	1:51 PM	42712595 PT-2022-000303 - _EB1_ Bundle 1 of 3 - Exhibit Bundle for Application for Summary Judgment - 114283607_2.pdf
9/27/2023	1:53 PM	351457212 PT-2022-000303 - _EB2_ Bundle 2 of 3 - Exhibit Bundle for Application for Summary Judgment - 114461165_1.pdf
9/27/2023	1:52 PM	70565567 PT-2022-000303 - _EB3_ Bundle 3 of 3 - Exhibit Bundle for Application for Summary Judgment - 114461173_1.pdf
4/8/2022	7:28 PM	991217 PT-2022-000303 - Application Notice for Interim Injunction Hearing dated 7 April 2022 - 103296911_1.PDF
11/5/2025	1:59 PM	5026737 PT-2022-000303 - Authorities Bundle for Use at Hearing of 2025 Review of the Final Injunction Order.pdf
4/17/2023	10:19 AM	178506009 PT-2022-000303 - Bundle 1 of 2 (Sections A, B, C & D) for Return Date Hearing on 20 April 2023 - 110913605_1.pdf
4/17/2023	10:19 AM	128567277 PT-2022-000303 - Bundle 2 of 2 (Sections E & F) for Return Date Hearing on 20 April 2023 - 110979467_1.pdf
11/3/2025	3:31 PM	25253927 PT-2022-000303 - Bundle for Use at Hearing of 2025 Review of the Final Injunction Order.pdf
9/27/2023	1:51 PM	77726087 PT-2022-000303 - Bundle for Use at Hearing of Application for Summary Judgment - 114461162_1.pdf
11/3/2025	3:31 PM	66418703 PT-2022-000303 - EB5 - Exhibit Bundle for Use at Hearing of 2025 Review of the Final Injunction Order.pdf
4/11/2022	3:10 PM	127841 PT-2022-000303 - Sealed Application Notice - Return Date - 08.04.2022 - 103313587_1.PDF
4/11/2022	3:10 PM	1141844 PT-2022-000303 - Sealed Claim Form - without rider - 11.04.2022 - 103313439_1.PDF
11/11/2024	4:15 PM	86098816 PT-2022-000303- Bundle for Use at Hearing of Review of the Final Injunction Order.pdf
11/11/2024	4:10 PM	194113078 PT-2022-000303- Exhibit Bundle for Hearing of the Review of the Final Injunction Order.pdf
10/4/2023	2:00 PM	97759798 PT-2022-000303- Revised Bundle for Use at Hearing of Application for Summary Judgment.pdf
1/5/2026	3:34 PM	3957578 PT-2022-00303 – Sealed Order Dated 13 November 2025 for the Hearing of the 2025 Review of the Final Injunction Order.
1/5/2026	3:34 PM	1349257 PT-20220-00303 – Amended Gleeson Order dated 6 October 2023 (amended pursuant to the Order of Master Kaye dated 13 No
11/6/2024	10:55 AM	1476949 Sealed Application Notice dated 04.11.24- for review of final injunction Order 2024.pdf
11/11/2024	10:30 AM	206819 Sealed Application Notice dated 4 November 2024 for review of final injunction Order 2024.pdf
10/30/2025	2:19 PM	312825 Sealed Application Notice for Claimant's Application dated 24.10.25.pdf
7/10/2023	4:44 PM	3200464 Sealed Application Notice – Claimants Summary Judgment Application dated 7 July 2023 containing details of listing ap
7/18/2023	12:04 PM	5203376 Sealed Application Notice- Claimants Summary Judgment Application dated 7 July 2023 containing Notice of hearing - 11
11/26/2024	2:23 PM	1215705 Sealed Order dated 20 November 2024 for the Hearing of the Review of the Final Injunction Order 2024.pdf
4/24/2023	9:19 AM	1966334 Sealed Order dated 21 April 2023 in relation to Return Date Hearing on 20 April 2023 - 111142819_1.PDF
4/12/2022	10:38 AM	3631509 Sealed Order dated 8 April 2022 in relation to interim injunction hearing - 103338343_1.PDF
4/5/2023	3:51 PM	265683 Second Witness Statement of Peter Malcolm Davis- dated 05.04.23 - 110813940_1.pdf
10/27/2025	3:09 PM	319730 Seventh Witness Statement of John M Armstrong dated 24.10.25.pdf
11/4/2024	4:41 PM	429056 Sixth Witness Statement of John Armstrong dated 4 November 2024.pdf
11/11/2024	4:02 PM	1827776 Third Witness Statement of Antony Douglas Phillips dated 11 November 2024.pdf
4/5/2023	3:49 PM	385903 Third Witness Statement of John Michael Armstrong- dated 05.04.23 - 110812946_1.pdf
7/10/2023	4:44 PM	460580 Third Witness Statement of Peter Davis dated 5 July 2023 - 112638588_1.PDF
11/11/2024	4:08 PM	4957678 UKOP15.pdf
1/5/2026	7:26 PM	152 web.config

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

APPENDIX 2

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

Cole Cannings

From:	Cole Cannings
Sent:	07 January 2026 11:02
To:	info@juststopoil.org; juststopoil@protonmail.com; juststopoilpress@protonmail.com
Cc:	UKOP injunction
Subject:	(1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]
Attachments:	PT-2022-00303 – Sealed Order Dated 13 November 2025 for the Hearing of the 2025 Review of the Final Injunction Order (1).pdf; PT-20220-00303 – Amended Gleeson Order dated 6 October 2023 (amended pursuant to the Order of Master Kaye dated 13 November 2025) (1).pdf
Importance:	High

Dear Just Stop Oil

As you are aware, we act for (1) United Kingdom Pipelines Limited and (2) West London Pipeline Storage Limited (the **"Claimants"**).

We write further to our emails dated 27 October 2025, 3 October 2025, 23 September 2025, 31 October 2025, 3 November 2025, 5 November 2025, 10 November 2025 and 12 November 2025 and we adopt the definitions used in those emails for ease.

The final injunctive relief granted by the Order and the Application were considered at the Hearing, which took place on Thursday 13 November 2025 before Master Kaye.

At the Hearing, the Court made no order as to the continuing effect of the Order. Also at the Hearing, the Court granted the Claimants' Application that an order be made permitting the Claimants to amend the Claim Form and Particulars of Claim to change the description of the Defendants and that the Order be amended to change the description of the Defendants accordingly.

By way of service, a copy of:

1. the Order made Master Kaye on 13 November 2025; and
2. the amended Order made by Mr Simon Gleeson (sitting as a Judge of the Chancery Division) on 6 October 2023 (the "**Amended Gleeson Order**")

are attached to this email and can also be found at the following weblink: https://ukop.azurewebsites.net

Yours faithfully,

Fieldfisher

Cole Cannings
Paralegal
D: +44 330 236 7738

fieldfisher

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

Cole Cannings

From: Cole Cannings
Sent: 07 January 2026 11:05
To: xr-legal@riseup.net
Cc: UKOP injunction
Subject: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]
Attachments: PT-2022-00303 – Sealed Order Dated 13 November 2025 for the Hearing of the 2025 Review of the Final Injunction Order (1).pdf; PT-20220-00303 – Amended Gleeson Order dated 6 October 2023 (amended pursuant to the Order of Master Kaye dated 13 November 2025) (1).pdf

Importance: High

Dear Extinction Rebellion

As you are aware, we act for (1) United Kingdom Pipelines Limited and (2) West London Pipeline Storage Limited (the **"Claimants"**).

We write further to our emails dated 27 October 2025, 3 October 2025, 23 September 2025, 31 October 2025, 3 November 2025, 5 November 2025, 10 November 2025 and 12 November 2025 and we adopt the definitions used in those emails for ease.

The final injunctive relief granted by the Order and the Application were considered at the Hearing, which took place on Thursday 13 November 2025 before Master Kaye.

At the Hearing, the Court made no order as to the continuing effect of the Order. Also at the Hearing, the Court granted the Claimants' Application that an order be made permitting the Claimants to amend the Claim Form and Particulars of Claim to change the description of the Defendants and that the Order be amended to change the description of the Defendants accordingly.

By way of service, a copy of:

1. the Order made Master Kaye on 13 November 2025; and
2. the amended Order made by Mr Simon Gleeson (sitting as a Judge of the Chancery Division) on 6 October 2023 (the "**Amended Gleeson Order**")

are attached to this email and can also be found at the following weblink: https://ukop.azurewebsites.net

Yours faithfully,

Fieldfisher

Cole Cannings
Paralegal
D: +44 330 236 7738

fieldfisher

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

Cole Cannings

From:	Cole Cannings
Sent:	07 January 2026 11:09
To:	youthdemand@proton.me; youthdemandpress@protonmail.com
Cc:	UKOP injunction
Subject:	(1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]
Attachments:	PT-2022-00303 – Sealed Order Dated 13 November 2025 for the Hearing of the 2025 Review of the Final Injunction Order (1).pdf; PT-20220-00303 – Amended Gleeson Order dated 6 October 2023 (amended pursuant to the Order of Master Kaye dated 13 November 2025) (1).pdf
Importance:	High

Dear Youth Demand

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

By an Order made by Mr Simon Gleeson (sitting as a Judge of the Chancery Division) on 6 October 2023 (the "**Order**"), the Court granted final injunctive relief to the Claimants in respect of Buncefield (Site 1) and Kingsbury (Site 2) as further described in Schedule 2 of the Order.

A copy of the Order, together with all relevant documents in respect of that Order and the proceedings can be found at the following weblink: ukop.azurewebsites.net - /

Paragraph 12 of the Order provides that there shall be, on or around the anniversary of the Order (being 6 October each year), subject to Court availability a hearing to review the final injunction Order with a time estimate of 2.5 hours plus reading time. The most recent review of the Order was heard on Thursday 13 November 2025 before Master Kaye (the "**Hearing**"). Prior to the Hearing, the Claimants made an application to Court that an order be made permitting the Claimants to amend the Claim Form and Particulars of Claim to change the description of the Defendants and that the Order be amended to change the description of the Defendants accordingly (the "**Application**").

At the Hearing, the Court made no order as to the continuing effect of the Order and granted the Claimants' Application, permitting the Claimants to amend the Claim Form and Particulars of Claim to change the description of the Defendants and that the Order be amended to change the description of the Defendants accordingly.

Pursuant to paragraph 6(d) and 9(b) of the Amended Gleeson Order, the Claimants are now required to:

1. send an email to this email address with the information that copies of the Order may be viewed at the web link referred to below; and

2. serve any future applications, any other documents, any notice of hearings in the Claim by the Claimants and their evidence in support on you.

Therefore, by way of service for and on behalf of the Claimants, a copy of:

a. the Order made Master Kaye on 13 November 2025; and

b. the amended Order made by Mr Simon Gleeson (sitting as a Judge of the Chancery Division) on 6 October 2023 (the "**Amended Gleeson Order**")

are attached to this email and can also be found at the following weblink: ukop.azurewebsites.net - /

Yours faithfully,

Fieldfisher

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

Cole Cannings

From:	Cole Cannings
Sent:	07 January 2026 11:12
To:	shut_the_system_info@proton.me
Cc:	UKOP injunction
Subject:	(1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]
Attachments:	PT-2022-00303 – Sealed Order Dated 13 November 2025 for the Hearing of the 2025 Review of the Final Injunction Order (1).pdf; PT-20220-00303 – Amended Gleeson Order dated 6 October 2023 (amended pursuant to the Order of Master Kaye dated 13 November 2025) (1).pdf
Importance:	High

Dear Shut the System

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

By an Order made by Mr Simon Gleeson (sitting as a Judge of the Chancery Division) on 6 October 2023 (the "**Order**"), the Court granted final injunctive relief to the Claimants in respect of Buncefield (Site 1) and Kingsbury (Site 2) as further described in Schedule 2 of the Order.

A copy of the Order, together with all relevant documents in respect of that Order and the proceedings can be found at the following weblink: ukop.azurewebsites.net - /

Paragraph 12 of the Order provides that there shall be, on or around the anniversary of the Order (being 6 October each year), subject to Court availability a hearing to review the final injunction Order with a time estimate of 2.5 hours plus reading time. The most recent review of the Order was heard on Thursday 13 November 2025 before Master Kaye (the "**Hearing**"). Prior to the Hearing, the Claimants made an application to Court that an order be made permitting the Claimants to amend the Claim Form and Particulars of Claim to change the description of the Defendants and that the Order be amended to change the description of the Defendants accordingly (the "**Application**").

At the Hearing, the Court made no order as to the continuing effect of the Order and granted the Claimants' Application, permitting the Claimants to amend the Claim Form and Particulars of Claim to change the description of the Defendants and that the Order be amended to change the description of the Defendants accordingly.

Pursuant to paragraph 6(d) and 9(b) of the Amended Gleeson Order, the Claimants are now required to:

1. send an email to this email address with the information that copies of the Order may be viewed at the web link referred to below; and

2. serve any future applications, any other documents, any notice of hearings in the Claim by the Claimants and their evidence in support on you.

Therefore, by way of service for and on behalf of the Claimants, a copy of:

a. the Order made Master Kaye on 13 November 2025; and

b. the amended Order made by Mr Simon Gleeson (sitting as a Judge of the Chancery Division) on 6 October 2023 (the "**Amended Gleeson Order**")

are attached to this email and can also be found at the following weblink: ukop.azurewebsites.net - /

Yours faithfully,

Fieldfisher

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

Cole Cannings

From: Cole Cannings
Sent: 07 January 2026 11:13
To: campaigner@fossilfreelondon.org; operations@fossilfreelondon.org
Cc: UKOP injunction
Subject: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]
Attachments: PT-2022-00303 – Sealed Order Dated 13 November 2025 for the Hearing of the 2025 Review of the Final Injunction Order (1).pdf; PT-20220-00303 – Amended Gleeson Order dated 6 October 2023 (amended pursuant to the Order of Master Kaye dated 13 November 2025) (1).pdf

Importance: High

Dear Fossil Free London

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

By an Order made by Mr Simon Gleeson (sitting as a Judge of the Chancery Division) on 6 October 2023 (the "**Order**"), the Court granted final injunctive relief to the Claimants in respect of Buncefield (Site 1) and Kingsbury (Site 2) as further described in Schedule 2 of the Order.

A copy of the Order, together with all relevant documents in respect of that Order and the proceedings can be found at the following weblink: ukop.azurewebsites.net - /

Paragraph 12 of the Order provides that there shall be, on or around the anniversary of the Order (being 6 October each year), subject to Court availability a hearing to review the final injunction Order with a time estimate of 2.5 hours plus reading time. The most recent review of the Order was heard on Thursday 13 November 2025 before Master Kaye (the "**Hearing**"). Prior to the Hearing, the Claimants made an application to Court that an order be made permitting the Claimants to amend the Claim Form and Particulars of Claim to change the description of the Defendants and that the Order be amended to change the description of the Defendants accordingly (the "**Application**").

At the Hearing, the Court made no order as to the continuing effect of the Order and granted the Claimants' Application, permitting the Claimants to amend the Claim Form and Particulars of Claim to change the description of the Defendants and that the Order be amended to change the description of the Defendants accordingly.

Pursuant to paragraph 6(d) and 9(b) of the Amended Gleeson Order, the Claimants are now required to:

1. send an email to this email address with the information that copies of the Order may be viewed at the web link referred to below; and

2. serve any future applications, any other documents, any notice of hearings in the Claim by the Claimants and their evidence in support on you.

Therefore, by way of service for and on behalf of the Claimants, a copy of:

a. the Order made Master Kaye on 13 November 2025; and

b. the amended Order made by Mr Simon Gleeson (sitting as a Judge of the Chancery Division) on 6 October 2023 (the "**Amended Gleeson Order**")

are attached to this email and can also be found at the following weblink: ukop.azurewebsites.net - /

Yours faithfully,

Fieldfisher

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

Cole Cannings

From:	Cole Cannings
Sent:	07 January 2026 11:16
To:	press@citizensarrestnetwork.org; crew@citizensarrestnetwork.org
Cc:	UKOP injunction
Subject:	(1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]
Attachments:	PT-2022-00303 – Sealed Order Dated 13 November 2025 for the Hearing of the 2025 Review of the Final Injunction Order (1).pdf; PT-20220-00303 – Amended Gleeson Order dated 6 October 2023 (amended pursuant to the Order of Master Kaye dated 13 November 2025) (1).pdf
Importance:	High

Dear Citizen's Arrest Network

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

By an Order made by Mr Simon Gleeson (sitting as a Judge of the Chancery Division) on 6 October 2023 (the "**Order**"), the Court granted final injunctive relief to the Claimants in respect of Buncefield (Site 1) and Kingsbury (Site 2) as further described in Schedule 2 of the Order.

A copy of the Order, together with all relevant documents in respect of that Order and the proceedings can be found at the following weblink: ukop.azurewebsites.net - /

Paragraph 12 of the Order provides that there shall be, on or around the anniversary of the Order (being 6 October each year), subject to Court availability a hearing to review the final injunction Order with a time estimate of 2.5 hours plus reading time. The most recent review of the Order was heard on Thursday 13 November 2025 before Master Kaye (the "**Hearing**"). Prior to the Hearing, the Claimants made an application to Court that an order be made permitting the Claimants to amend the Claim Form and Particulars of Claim to change the description of the Defendants and that the Order be amended to change the description of the Defendants accordingly (the "**Application**").

At the Hearing, the Court made no order as to the continuing effect of the Order and granted the Claimants' Application, permitting the Claimants to amend the Claim Form and Particulars of Claim to change the description of the Defendants and that the Order be amended to change the description of the Defendants accordingly.

Pursuant to paragraph 6(d) and 9(b) of the Amended Gleeson Order, the Claimants are now required to:

1. send an email to this email address with the information that copies of the Order may be viewed at the web link referred to below; and

2. serve any future applications, any other documents, any notice of hearings in the Claim by the Claimants and their evidence in support on you.

Therefore, by way of service for and on behalf of the Claimants, a copy of:

a. the Order made Master Kaye on 13 November 2025; and

b. the amended Order made by Mr Simon Gleeson (sitting as a Judge of the Chancery Division) on 6 October 2023 (the "**Amended Gleeson Order**")

are attached to this email and can also be found at the following weblink: ukop.azurewebsites.net - /

Yours faithfully,

Fieldfisher

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

APPENDIX 3

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

Cole Cannings

From: Microsoft Outlook
To: info@juststopoil.org; juststopoil@protonmail.com; juststopoilpress@protonmail.com
Sent: 07 January 2026 11:03
Subject: Relayed: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

info@juststopoil.org (info@juststopoil.org)

juststopoil@protonmail.com (juststopoil@protonmail.com)

juststopoilpress@protonmail.com (juststopoilpress@protonmail.com)

Subject: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

Cole Cannings

From: Microsoft Outlook
To: xr-legal@riseup.net
Sent: 07 January 2026 11:05
Subject: Relayed: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

xr-legal@riseup.net (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]

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

Cole Cannings

From: xr-legal@riseup.net
Sent: 07 January 2026 11:06
To: Cole Cannings
Subject: Autoreply for XR Legal Support

Hi there,

Thanks for getting in touch with the XR Legal Support Team.

We have received your email and are working on getting a response to you ASAP! We are currently quite low in capacity and so our response to your email(s) might be delayed.

If you don't hear from us within two weeks, please email back and we will do our best to get to you sooner.

In the meantime, please have a look at our website (https://www.informeddissent.info), as this may have information to answer your questions.

If your email is related to an upcoming court appearance, we will prioritise your email and get a response to you ASAP. Please also email the XR Legal Fund team to ensure you have the relevant support (legalfinancialsupport@riseup.net) with the details of your court date.

In Solidarity,
XR Legal Support Team

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

Cole Cannings

From: Microsoft Outlook
To: youthdemandpress@protonmail.com; youthdemand@proton.me
Sent: 07 January 2026 11:10
Subject: Relayed: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

youthdemandpress@protonmail.com (youthdemandpress@protonmail.com)

youthdemand@proton.me (youthdemand@proton.me)

Subject: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

Cole Cannings

From: Microsoft Outlook
To: shut_the_system_info@proton.me
Sent: 07 January 2026 11:12
Subject: Relayed: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

shut_the_system_info@proton.me (shut_the_system_info@proton.me)

Subject: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

Cole Cannings

From: Microsoft Outlook
To: operations@fossilfreelondon.org; campaigner@fossilfreelondon.org
Sent: 07 January 2026 11:14
Subject: Relayed: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

operations@fossilfreelondon.org (operations@fossilfreelondon.org)

campaigner@fossilfreelondon.org (campaigner@fossilfreelondon.org)

Subject: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

Cole Cannings

From: Microsoft Outlook
To: crew@citizensarrestnetwork.org; press@citizensarrestnetwork.org
Sent: 07 January 2026 11:17
Subject: Relayed: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

crew@citizensarrestnetwork.org (crew@citizensarrestnetwork.org)

press@citizensarrestnetwork.org (press@citizensarrestnetwork.org)

Subject: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

Certificate of service

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

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

On what day did you serve?	0	7	/	0	1	/	2	0	2	6
The date of service is	0	7	/	0	1	/	2	0	2	6

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, 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 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, 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 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.

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 (the "**Order**") (the "**Amended Gleeson Order**")

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

The First and Second Defendants pursuant to paragraph 6 of the Amended Gleeson 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)*

[X] by other means permitted by the court *(please specify)*

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

Service was effected:

(a) on the web link specified in paragraph 6(a) of the Amended Gleeson Order (https://ukop.azurewebsites.net);

(b) by affixing copies of the Order (which includes the Amended Gleeson Order) in clear envelopes at a minimum of two prominent locations on the perimeter fencing or gates of the Sites (as more particularly described in Schedule 2 of the Amended Gleeson Order, and as shown shaded red on the plan annexed to Schedule 3 and Schedule 4 of the Amended Gleeson Order):

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Pursuant to paragraph 5 of the Order and in accordance with paragraphs 6 to 8 of the Amended Gleeson Order:

1. Service of the Order was effected at 15:34 on 5 January 2026 by uploading the Order to https://ukop.azurewebsites.net. A copy of the web link page is at **Appendix 1** to this certificate of service.

2. Service of the Amended Gleeson Order was further effected at the Sites (as more particularly described in Schedule 2 of the Amended Gleeson Order, and as shown shaded red on the plan annexed to Schedule 3 and Schedule 4 of the Amended Gleeson Order) by the Claimants' and its appointed agents:

(a) in respect of Site 1 at approximately 14:00 on 22 December 2025, by affixing copies of the Order (including a copy of the Amended Gleeson Order) in clear envelopes to the perimeter fencing or gates at two prominent locations at Site 1. A copy of photographs of the Order so affixed are at **Appendix 2** to this certificate of service.

(b) in respect of Site 2 between 11:00 and 11:25 on 24 December 2025 by affixing copies of the Order (including a copy of the Amended Gleeson Order) in clear envelopes to the perimeter fencing or gates at two prominent locations at Site 2. A copy of photographs of the Order so affixed are at **Appendix 3** to this certificate of service.

3. Service of the Amended Gleeson Order was also effected at the Sites (as more particularly described in Schedule 2 of the Amended Gleeson Order, and as shown shaded red on the plan annexed to Schedule 3 and Schedule 4 of the Amended Gleeson Order) by the Claimants' and its appointed agents:

(a) in respect of Site 1 between 13:30 and 15:00 on 23 December 2025 and between 8:45 and 10:45 on 24 December 2025, by affixing copies of the site injunction notice (in the form set out in Schedule 5 of the Amended Gleeson Order) in not less than A2 size in clearly visible locations (including at entranceways, access points, gates and attached to perimeter fencing) around and comprising part of Site 1. A copy of photographs of the notices so affixed are at **Appendix 4** to this certificate of service.

(b) in respect of Site 2 between 7:00 and 10:00 on 24 December 2025, by affixing copies of the site injunction notice (in the form set out in Schedule 6 of the Amended Gleeson Order) in not less than A2 size in clearly visible locations (including at entranceways, access points, gates

(c) by fixing site warning notices (in the form set out in Schedules 5 and 6 of the Amended Gleeson Order) in clearly visible locations (including entrance ways, access points, gates and attached to perimeter fencing) around and comprising part of the Sites; and

(d) at the email addresses specified in paragraph 6(b) of the Amended Gleeson Order:
(i) xr-legal@riseup.net;
(ii) juststopoilpress@protonmail.com;
(iii) info@juststopoil.org;
(iv) juststopoil@protonmail.com
(v) youthdemand@proton.me;
(vi) youthdemandpress@protonmail.com;
(vii) shut_the_system_info@proton.me;
(viii) campaigner@fossilfreelondon.org;
(ix) operations@fossilfreelondon.org;
(x) press@citizensarrestnetwork.org; and
(xi) crew@citizensarrestnetwork.org.

Being the [ ] claimant's [X] 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
[X] other *(please specify)*

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and attached to perimeter fencing) around and comprising part of Site 2. A copy of photographs of the notices so affixed are at **Appendix 5** to this certificate of service

2. Service of the Amended Gleeson Order was further effected on 7 January 2026 by an email being sent to the following email addresses at the times specified below:

info@juststopoil.org, juststopoil@protonmail.com, & juststopoilpress@protonmail.com at 11:02

xr-legal@riseup.net at 11:05

youthdemand@proton.me and youthdemandpress@protonmail.com at 11:09

shut_the_system_info@proton.me at 11:12

campaigner@fossilfreelondon.org & operations@fossilfreelondon.org at 11:13; and

press@citizensarrestnetwork.org & crew@citizensarrestnetwork.org at 11:16

setting out that a copy of the Amended Gleeson Order, together with all relevant documents in respect of the Amended Gleeson Order and the proceedings can be found at the following link: https://ukop.azurewebistes.net and attaching a copy of the Amended Gleeson Order.

Copies of the emails are at **Appendix 6** to this certificate of service. Copies of the delivery receipts and the automatic reply received from xr-legal@riseup.net are at **Appendix 7** to this certificate of service.

[ ] 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)*

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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: ANTONY DOUGLAS PHILLIPS

Signed: Signed by: Antony Phillips 2AEF4626Q58B472

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

Position or office held: Partner

(If signing on behalf of firm or company)

Date: 1 9 | 0 1 | 2 0 2 6

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.

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

APPENDIX 1

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

ukop.azurewebsites.net - /

4/13/2022	9:01 AM	270368 (2022.04.08) Final Note from Injunction Hearing dated 08 April 2022 - 103362492_1.PDF
4/25/2022	4:16 PM	304635 (2022.04.25) Claimants_ Solicitors Note of Return Date Injunction Hearing dated 20 April 2022 - 103566927_1.PDF
10/27/2025	3:09 PM	232235 Application Notice dated 24.10.25 - Claimant's Application to amend description of Defendants.pdf
4/5/2023	3:45 PM	3468912 Application notice- dated 04.04.23- for return hearing on 20.04.23 - 110797879_1.pdf
11/4/2024	4:41 PM	153722 Application notice- dated 04.11.24- for review of final injunction Order 2024.pdf
4/19/2022	3:23 PM	84022730 Bundle 1 of 2 for Return Date Hearing on 20 April 2022 (comprising the Bundle for Interim Injunction Hearing on 8 Apr
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11/14/2024	4:18 PM	4091146 Bundle of Authorities for Hearing of the Review of the Final Injunction Order 2024.pdf
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4/17/2023	11:26 AM	189540 Claimants' Skeleton Argument for Return Date Hearing on 20 April 2023.pdf
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10/27/2025	3:09 PM	2531562 Draft Order for Claimant's Application dated 24.10.25.pdf
7/10/2023	4:44 PM	1566913 Draft Order for Claimants Summary Judgment Application dated 7 July 2023 - 112689563_1.PDF
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9/27/2023	11:37 AM	287645 Fifth Witness Statement of John Michael Armstrong dated 22 September 2023 - 114373547_1.pdf
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4/8/2022	7:28 PM	4712019 First Witness Statement of Daniel Owen Christopher Talfan Davies dated 8 April 2022 together with Exhibit UKOP3 - 103
7/10/2023	4:44 PM	404212 Fourth Witness Statement of John Armstrong dated 6 July 2023 - 112644075_1.PDF
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10/23/2024	10:00 AM	127180 Notice of Hearing Date dated 23 October 2024.pdf
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4/17/2023	10:19 AM	128567277 PT-2022-000303 - Bundle 2 of 2 (Sections E & F) for Return Date Hearing on 20 April 2023 - 110979467_1.pdf
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4/11/2022	3:10 PM	1141844 PT-2022-000303 - Sealed Claim Form - without rider - 11.04.2022 - 103313439_1.PDF
11/11/2024	4:15 PM	86098816 PT-2022-000303- Bundle for Use at Hearing of Review of the Final Injunction Order.pdf
11/11/2024	4:10 PM	194113078 PT-2022-000303- Exhibit Bundle for Hearing of the Review of the Final Injunction Order.pdf
10/4/2023	2:00 PM	97759798 PT-2022-000303- Revised Bundle for Use at Hearing of Application for Summary Judgment.pdf
1/5/2026	3:34 PM	3957578 PT-2022-00303 – Sealed Order Dated 13 November 2025 for the Hearing of the 2025 Review of the Final Injunction Order.
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11/6/2024	10:55 AM	1476949 Sealed Application Notice dated 04.11.24- for review of final injunction Order 2024.pdf
11/11/2024	10:30 AM	206819 Sealed Application Notice dated 4 November 2024 for review of final injunction Order 2024.pdf
10/30/2025	2:19 PM	312825 Sealed Application Notice for Claimant's Application dated 24.10.25.pdf
7/10/2023	4:44 PM	3200464 Sealed Application Notice – Claimants Summary Judgment Application dated 7 July 2023 containing details of listing ap
7/18/2023	12:04 PM	5203376 Sealed Application Notice- Claimants Summary Judgment Application dated 7 July 2023 containing Notice of hearing - 11
11/26/2024	2:23 PM	1215705 Sealed Order dated 20 November 2024 for the Hearing of the Review of the Final Injunction Order 2024.pdf
4/24/2023	9:19 AM	1966334 Sealed Order dated 21 April 2023 in relation to Return Date Hearing on 20 April 2023 - 111142819_1.PDF
4/12/2022	10:38 AM	3631509 Sealed Order dated 8 April 2022 in relation to interim injunction hearing - 103338343_1.PDF
4/5/2023	3:51 PM	265683 Second Witness Statement of Peter Malcolm Davis- dated 05.04.23 - 110813940_1.pdf
10/27/2025	3:09 PM	319730 Seventh Witness Statement of John M Armstrong dated 24.10.25.pdf
11/4/2024	4:41 PM	429056 Sixth Witness Statement of John Armstrong dated 4 November 2024.pdf
11/11/2024	4:02 PM	1827776 Third Witness Statement of Antony Douglas Phillips dated 11 November 2024.pdf
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APPENDIX 2

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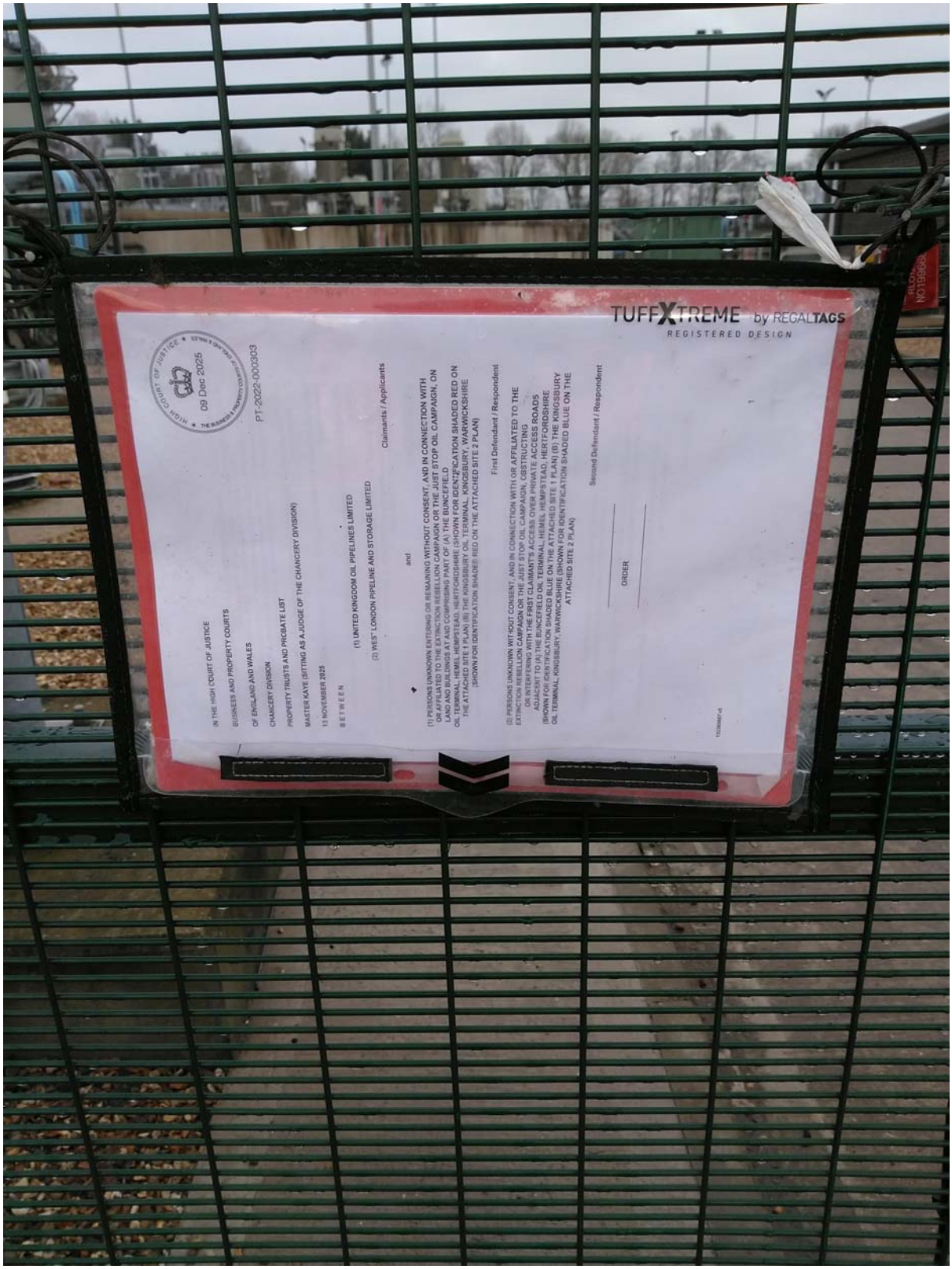

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APPENDIX 3

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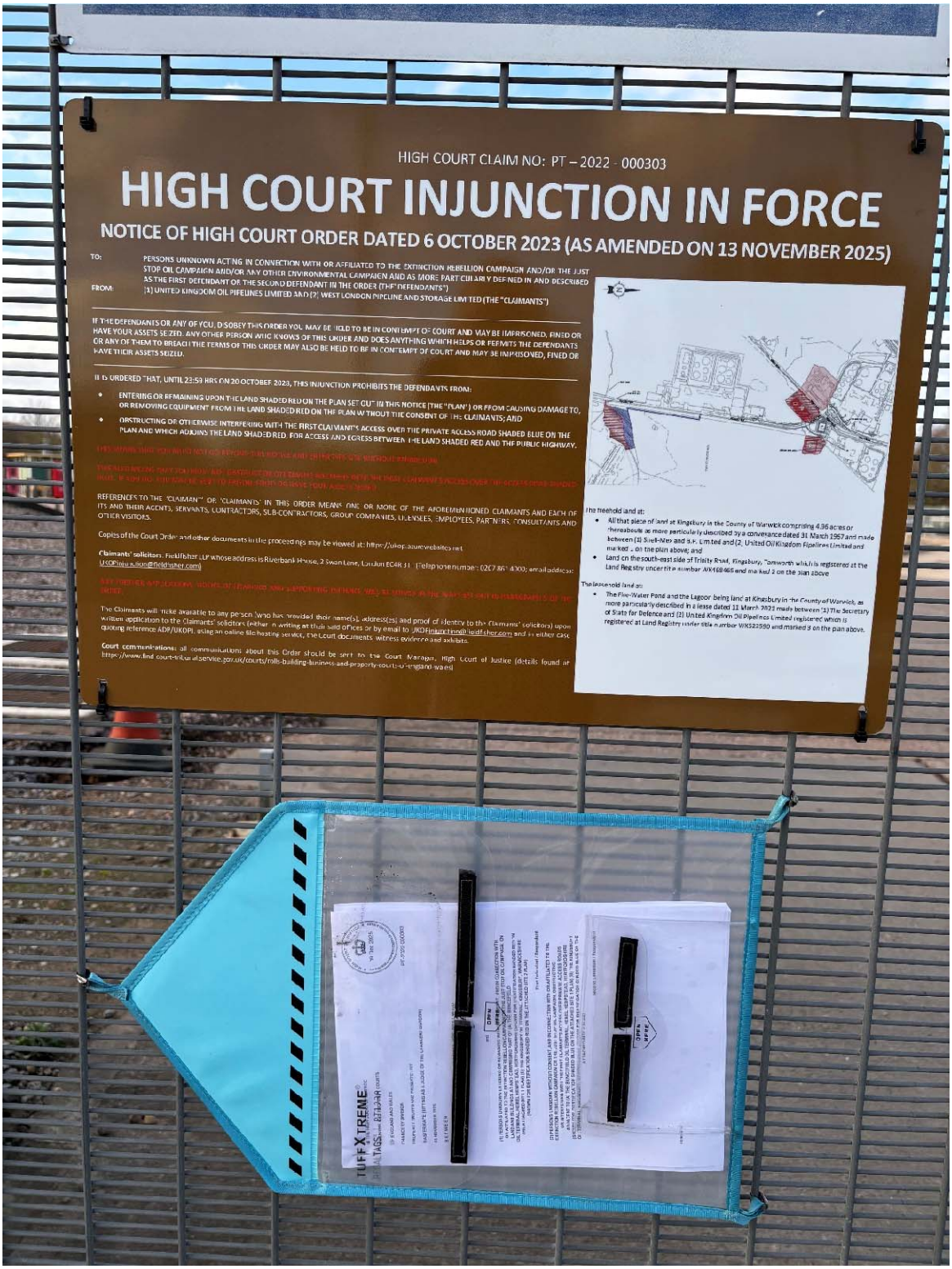

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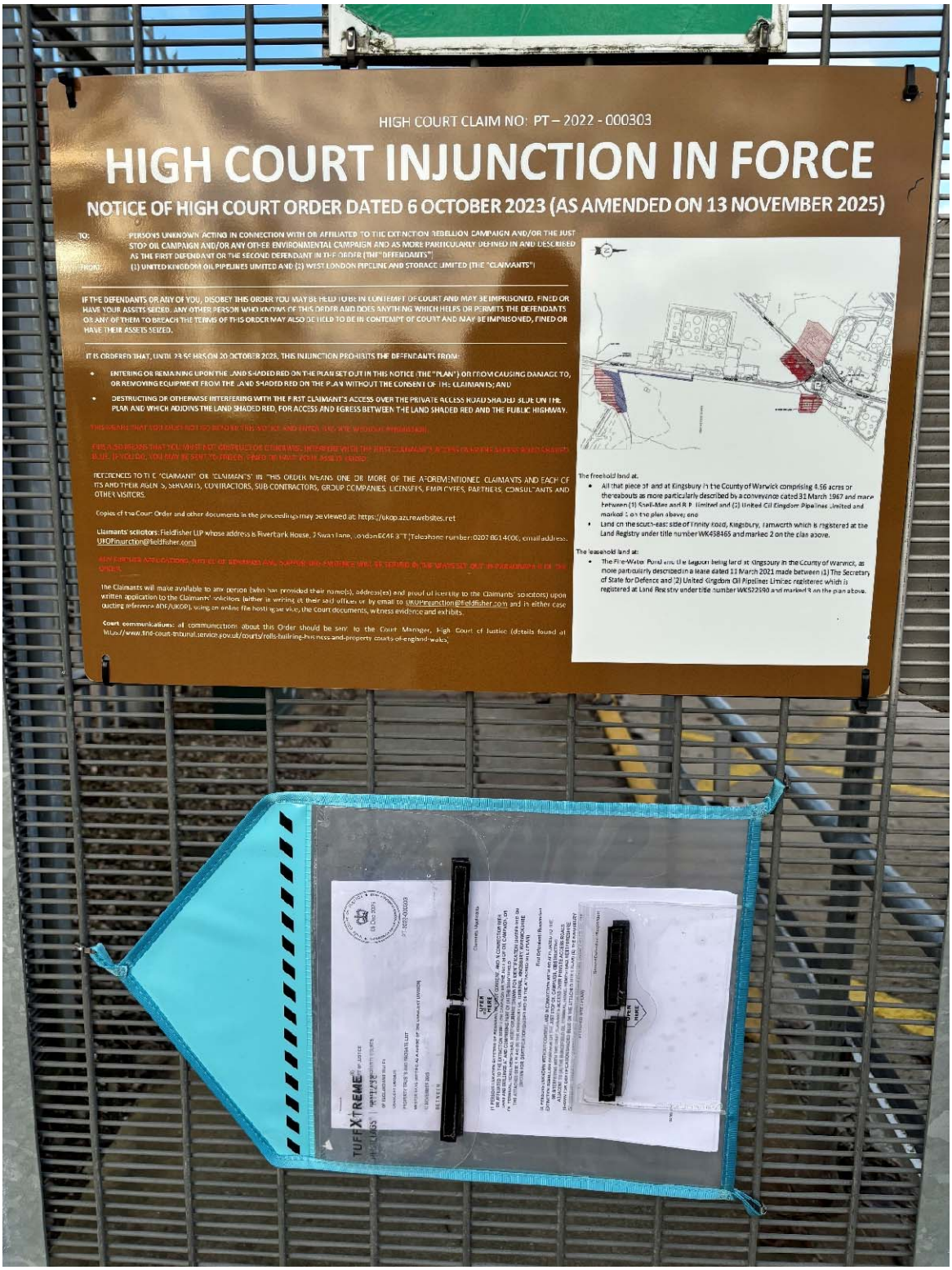

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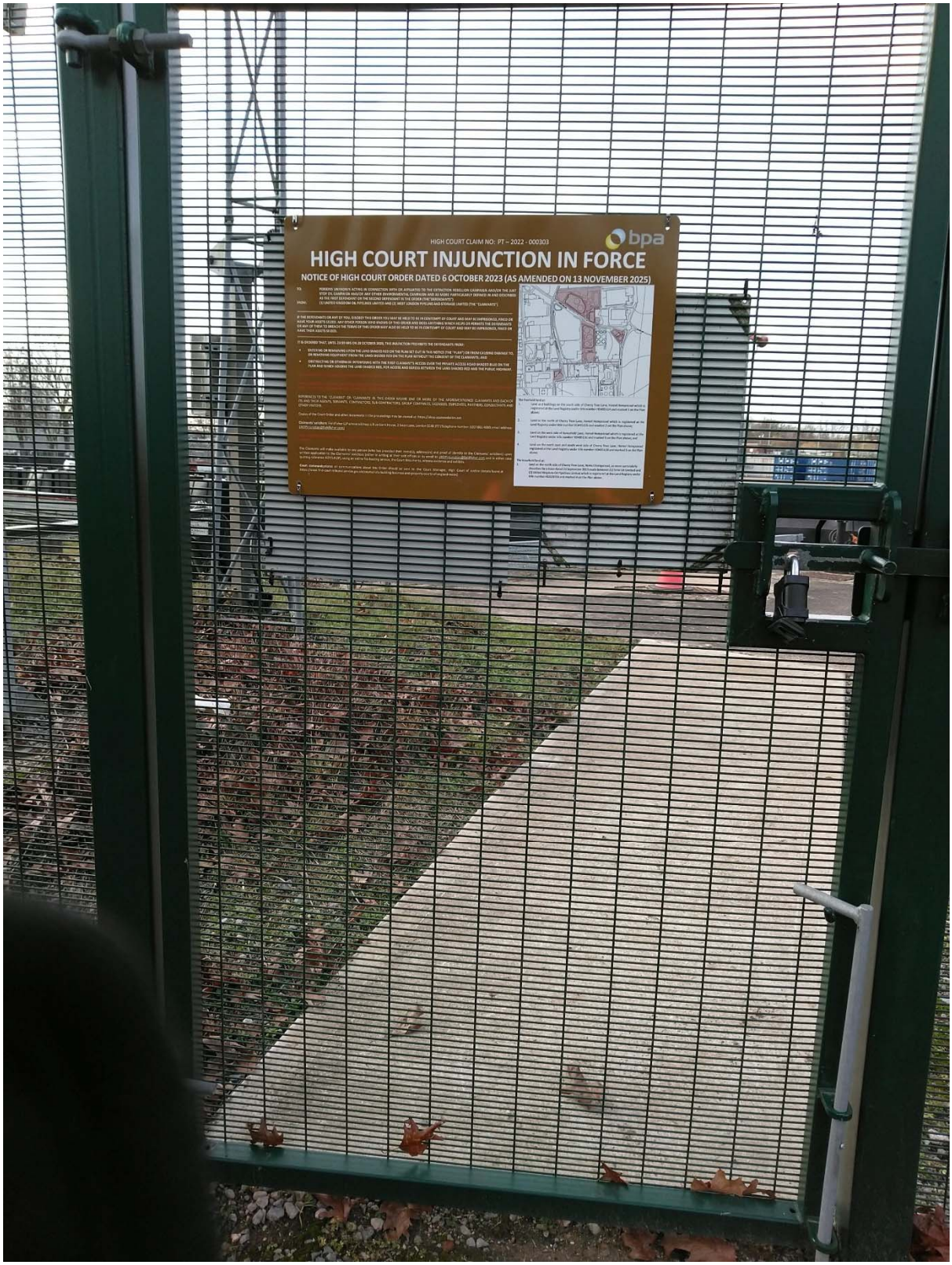

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APPENDIX 5

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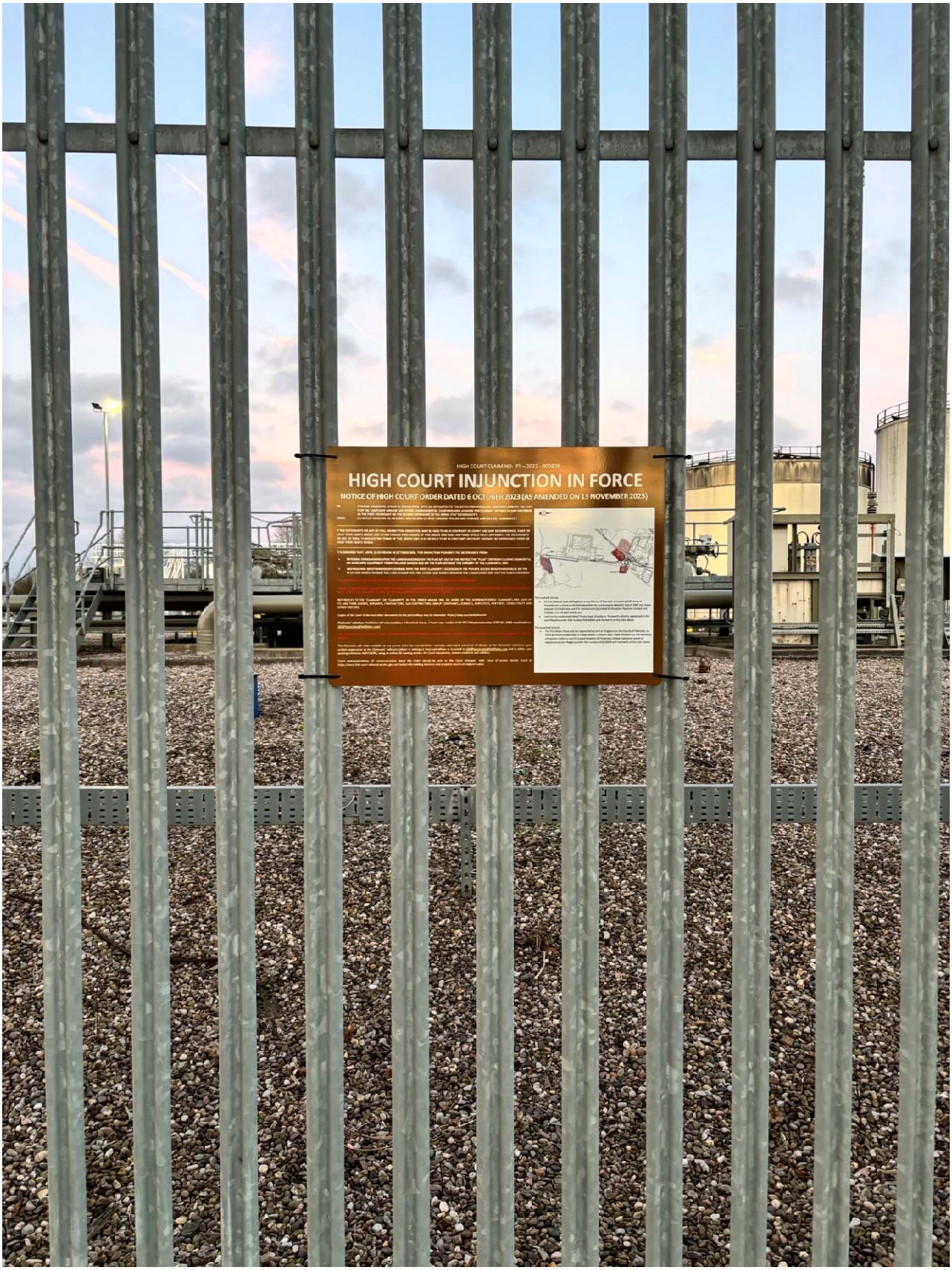

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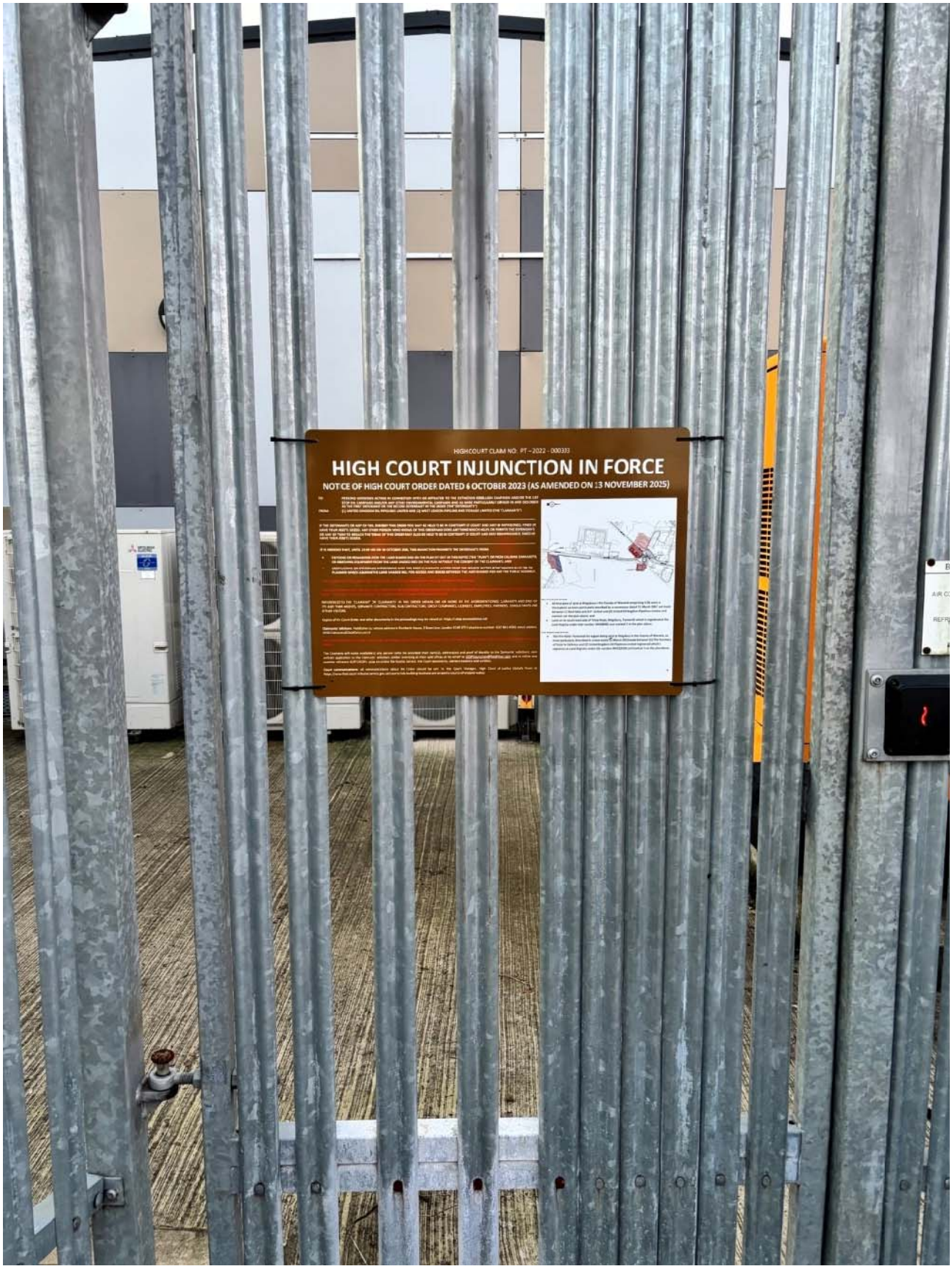

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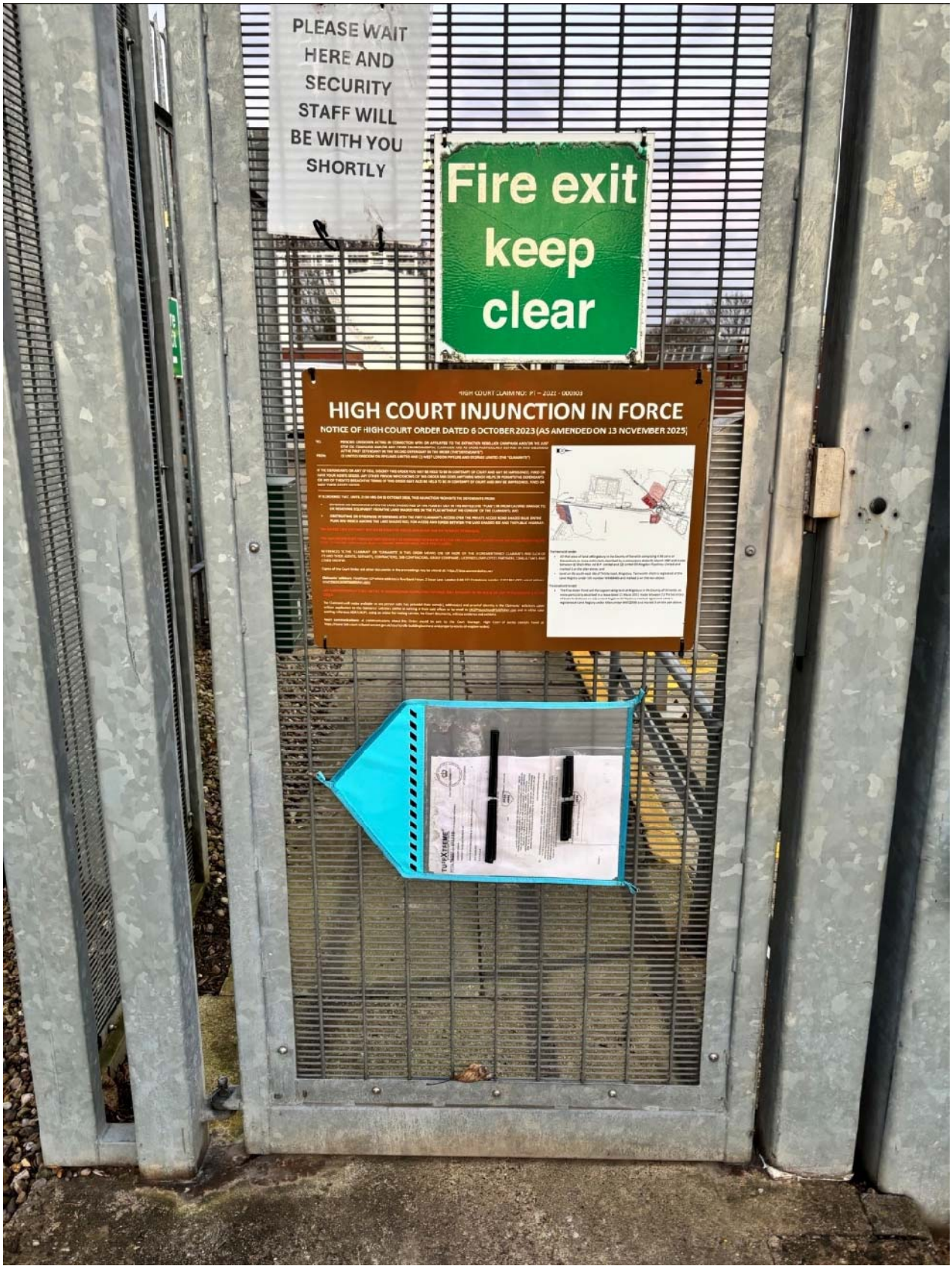

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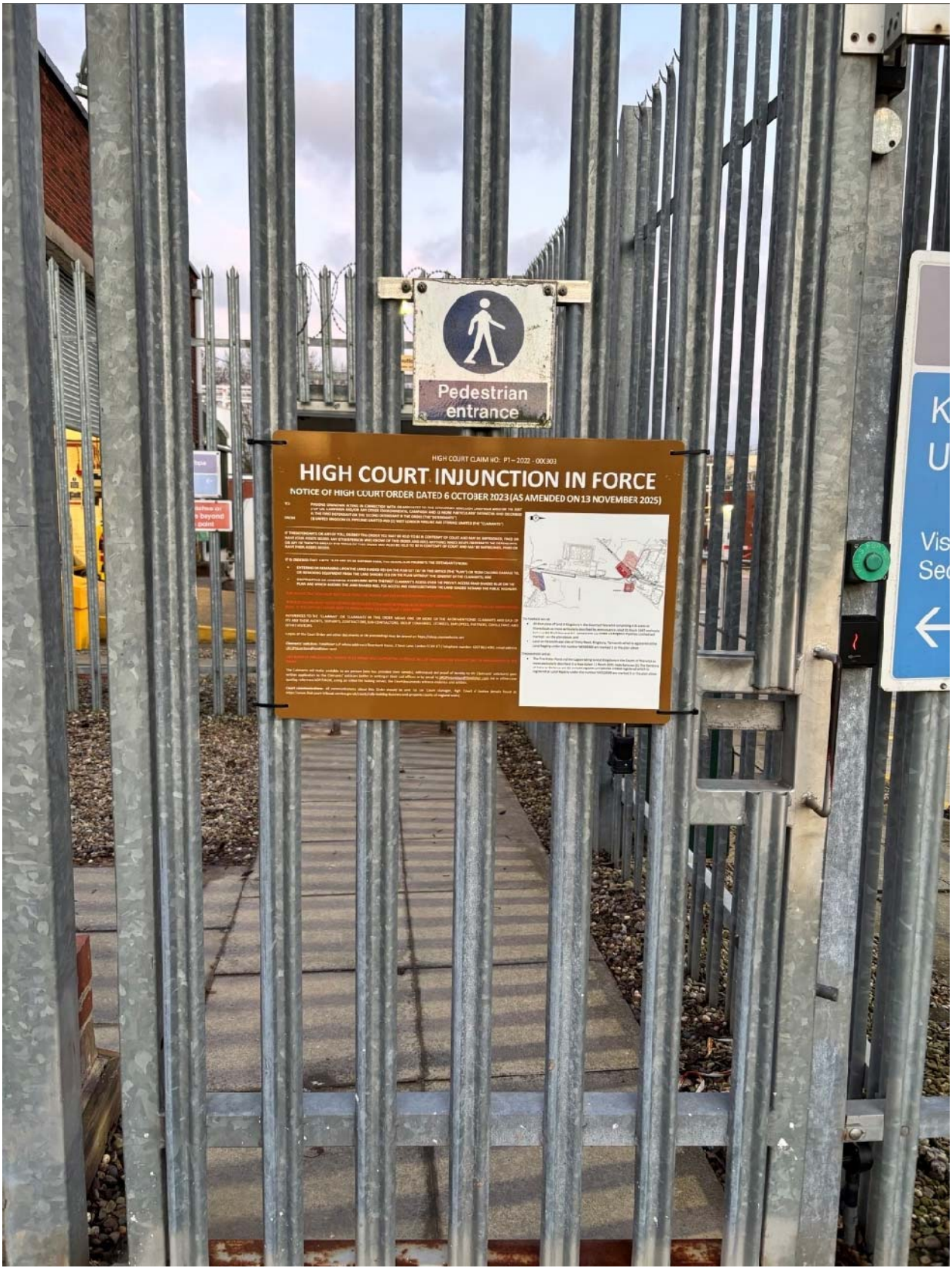

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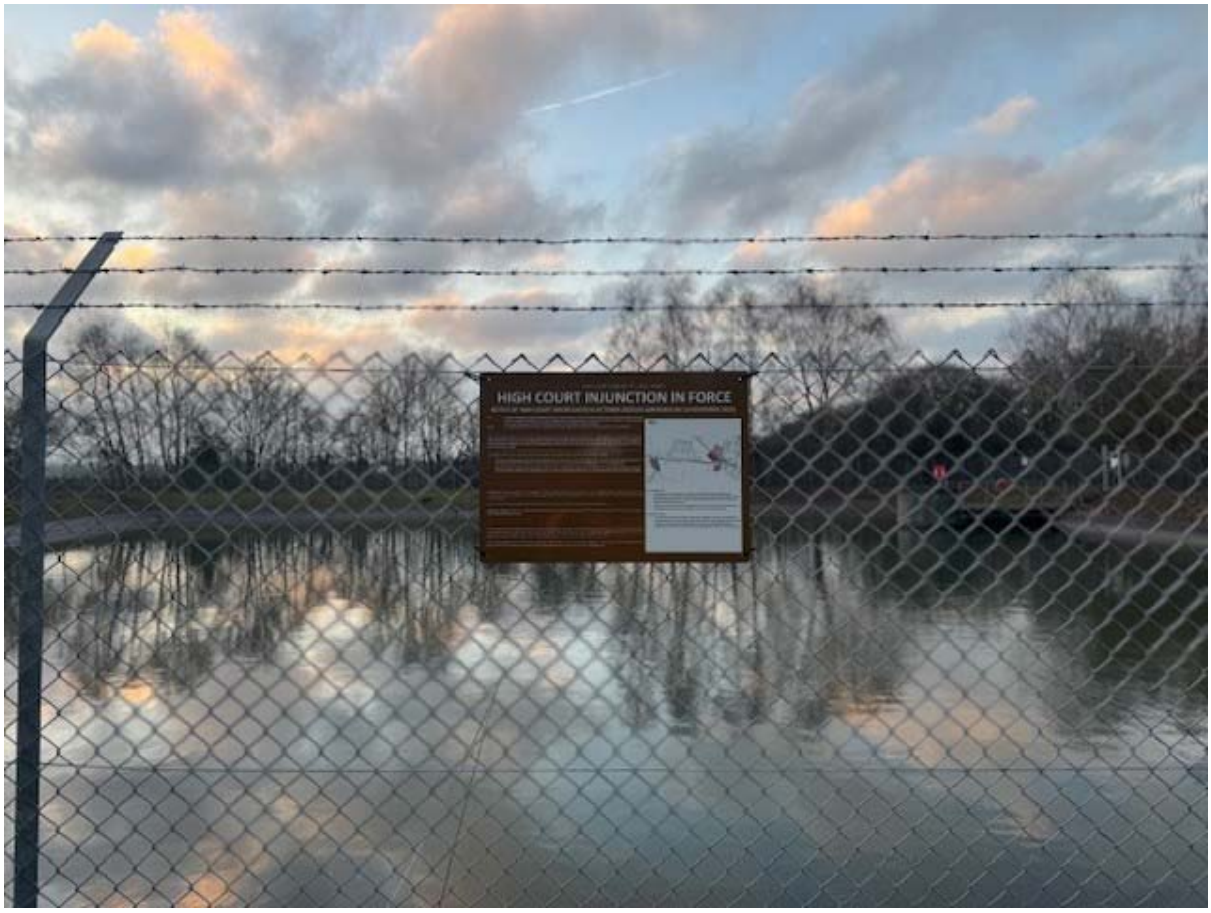

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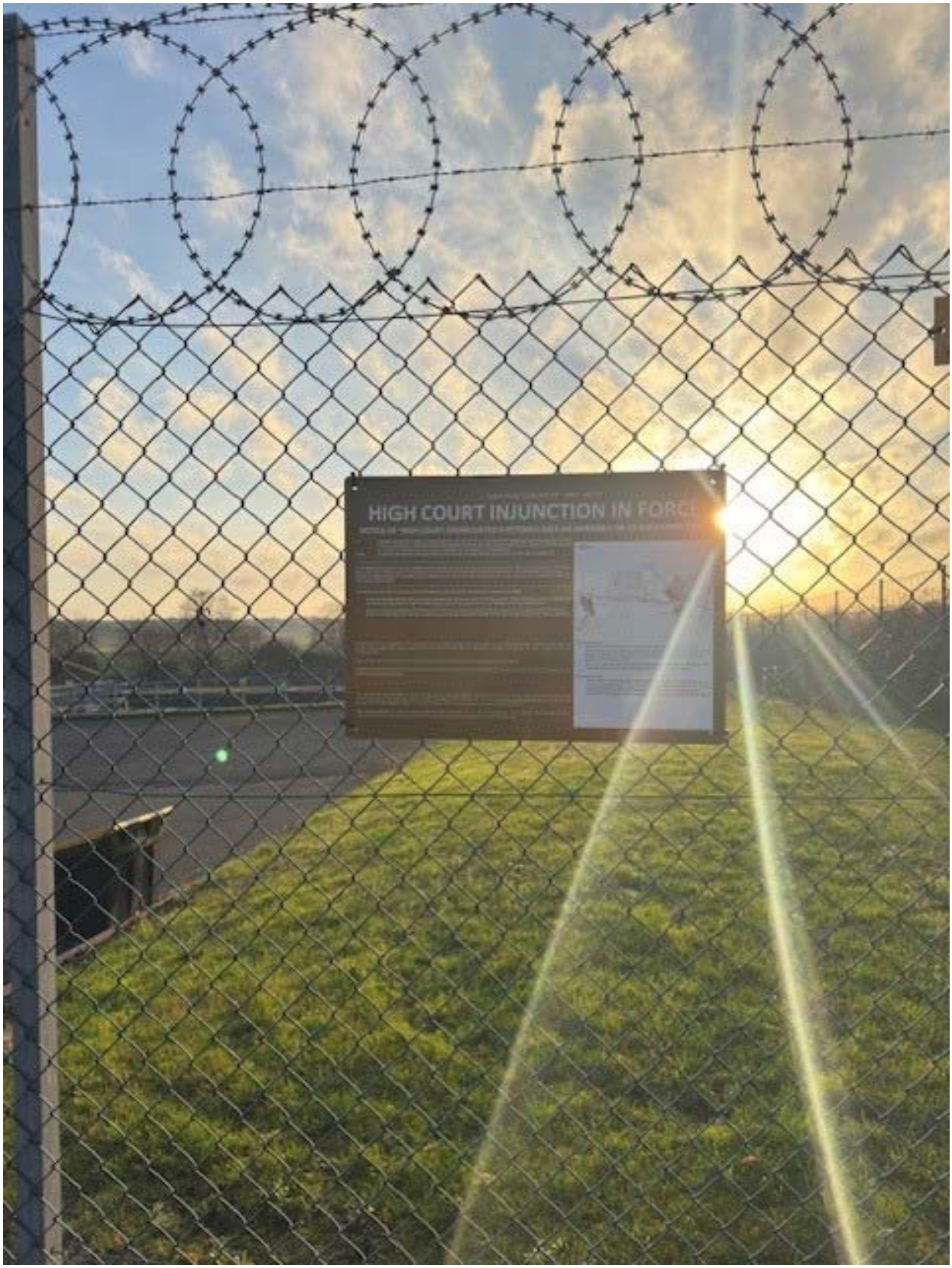

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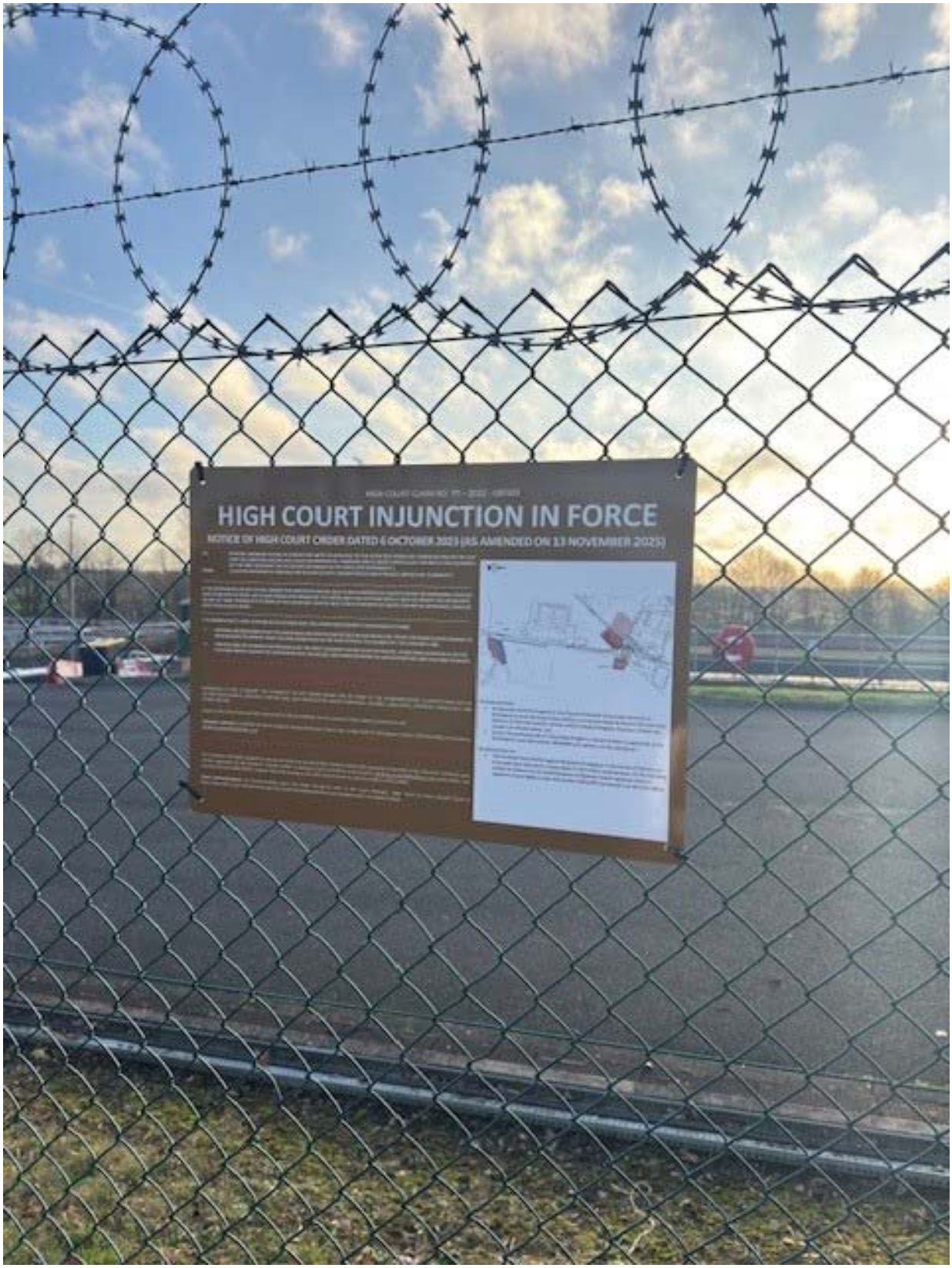

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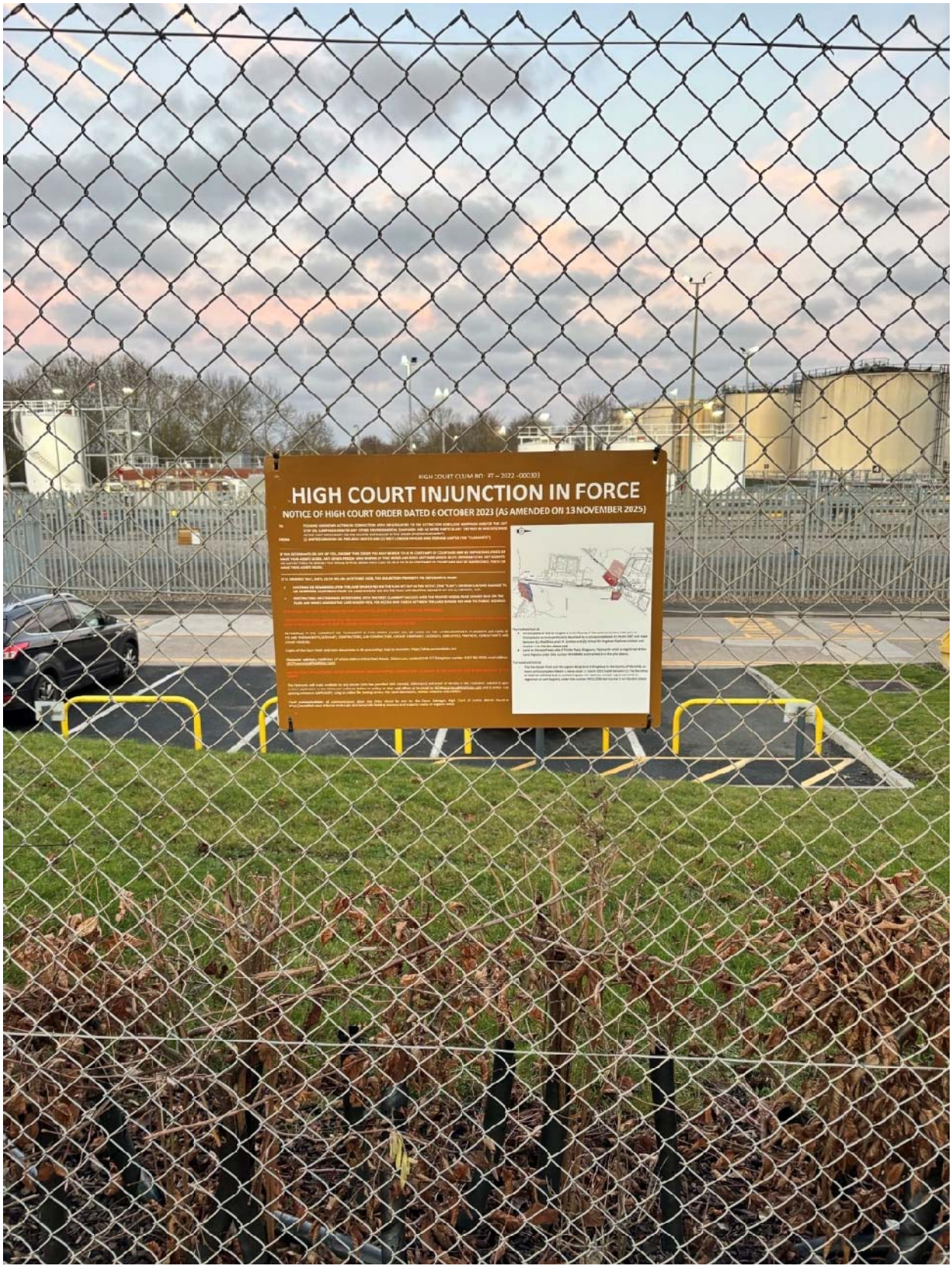

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APPENDIX 6

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

Cole Cannings

From: Cole Cannings
Sent: 07 January 2026 11:02
To: info@juststopoil.org; juststopoil@protonmail.com; juststopoilpress@protonmail.com
Cc: UKOP injunction
Subject: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]
Attachments: PT-2022-00303 – Sealed Order Dated 13 November 2025 for the Hearing of the 2025 Review of the Final Injunction Order (1).pdf; PT-20220-00303 – Amended Gleeson Order dated 6 October 2023 (amended pursuant to the Order of Master Kaye dated 13 November 2025) (1).pdf

Importance: High

Dear Just Stop Oil

As you are aware, we act for (1) United Kingdom Pipelines Limited and (2) West London Pipeline Storage Limited (the **"Claimants"**).

We write further to our emails dated 27 October 2025, 3 October 2025, 23 September 2025, 31 October 2025, 3 November 2025, 5 November 2025, 10 November 2025 and 12 November 2025 and we adopt the definitions used in those emails for ease.

The final injunctive relief granted by the Order and the Application were considered at the Hearing, which took place on Thursday 13 November 2025 before Master Kaye.

At the Hearing, the Court made no order as to the continuing effect of the Order. Also at the Hearing, the Court granted the Claimants' Application that an order be made permitting the Claimants to amend the Claim Form and Particulars of Claim to change the description of the Defendants and that the Order be amended to change the description of the Defendants accordingly.

By way of service, a copy of:

1. the Order made Master Kaye on 13 November 2025; and
2. the amended Order made by Mr Simon Gleeson (sitting as a Judge of the Chancery Division) on 6 October 2023 (the "**Amended Gleeson Order**")

are attached to this email and can also be found at the following weblink: https://ukop.azurewebsites.net

Yours faithfully,

Fieldfisher

Cole Cannings
Paralegal
D: +44 330 236 7738

fieldfisher

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

Cole Cannings

From: Cole Cannings
Sent: 07 January 2026 11:05
To: xr-legal@riseup.net
Cc: UKOP injunction
Subject: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]
Attachments: PT-2022-00303 – Sealed Order Dated 13 November 2025 for the Hearing of the 2025 Review of the Final Injunction Order (1).pdf; PT-20220-00303 – Amended Gleeson Order dated 6 October 2023 (amended pursuant to the Order of Master Kaye dated 13 November 2025) (1).pdf

Importance: High

Dear Extinction Rebellion

As you are aware, we act for (1) United Kingdom Pipelines Limited and (2) West London Pipeline Storage Limited (the **"Claimants"**).

We write further to our emails dated 27 October 2025, 3 October 2025, 23 September 2025, 31 October 2025, 3 November 2025, 5 November 2025, 10 November 2025 and 12 November 2025 and we adopt the definitions used in those emails for ease.

The final injunctive relief granted by the Order and the Application were considered at the Hearing, which took place on Thursday 13 November 2025 before Master Kaye.

At the Hearing, the Court made no order as to the continuing effect of the Order. Also at the Hearing, the Court granted the Claimants' Application that an order be made permitting the Claimants to amend the Claim Form and Particulars of Claim to change the description of the Defendants and that the Order be amended to change the description of the Defendants accordingly.

By way of service, a copy of:

1. the Order made Master Kaye on 13 November 2025; and
2. the amended Order made by Mr Simon Gleeson (sitting as a Judge of the Chancery Division) on 6 October 2023 (the "**Amended Gleeson Order**")

are attached to this email and can also be found at the following weblink: https://ukop.azurewebsites.net

Yours faithfully,

Fieldfisher

Cole Cannings
Paralegal
D: +44 330 236 7738

fieldfisher

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

Cole Cannings

From: Cole Cannings
Sent: 07 January 2026 11:09
To: youthdemand@proton.me; youthdemandpress@protonmail.com
Cc: UKOP injunction
Subject: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]
Attachments: PT-2022-00303 – Sealed Order Dated 13 November 2025 for the Hearing of the 2025 Review of the Final Injunction Order (1).pdf; PT-20220-00303 – Amended Gleeson Order dated 6 October 2023 (amended pursuant to the Order of Master Kaye dated 13 November 2025) (1).pdf

Importance: High

Dear Youth Demand

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

By an Order made by Mr Simon Gleeson (sitting as a Judge of the Chancery Division) on 6 October 2023 (the "**Order**"), the Court granted final injunctive relief to the Claimants in respect of Buncefield (Site 1) and Kingsbury (Site 2) as further described in Schedule 2 of the Order.

A copy of the Order, together with all relevant documents in respect of that Order and the proceedings can be found at the following weblink: ukop.azurewebsites.net - /

Paragraph 12 of the Order provides that there shall be, on or around the anniversary of the Order (being 6 October each year), subject to Court availability a hearing to review the final injunction Order with a time estimate of 2.5 hours plus reading time. The most recent review of the Order was heard on Thursday 13 November 2025 before Master Kaye (the "**Hearing**"). Prior to the Hearing, the Claimants made an application to Court that an order be made permitting the Claimants to amend the Claim Form and Particulars of Claim to change the description of the Defendants and that the Order be amended to change the description of the Defendants accordingly (the "**Application**").

At the Hearing, the Court made no order as to the continuing effect of the Order and granted the Claimants' Application, permitting the Claimants to amend the Claim Form and Particulars of Claim to change the description of the Defendants and that the Order be amended to change the description of the Defendants accordingly.

Pursuant to paragraph 6(d) and 9(b) of the Amended Gleeson Order, the Claimants are now required to:

1. send an email to this email address with the information that copies of the Order may be viewed at the web link referred to below; and

2. serve any future applications, any other documents, any notice of hearings in the Claim by the Claimants and their evidence in support on you.

Therefore, by way of service for and on behalf of the Claimants, a copy of:

a. the Order made Master Kaye on 13 November 2025; and

b. the amended Order made by Mr Simon Gleeson (sitting as a Judge of the Chancery Division) on 6 October 2023 (the "**Amended Gleeson Order**")

are attached to this email and can also be found at the following weblink: ukop.azurewebsites.net - /

Yours faithfully,

Fieldfisher

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

Cole Cannings

From: Cole Cannings
Sent: 07 January 2026 11:12
To: shut_the_system_info@proton.me
Cc: UKOP injunction
Subject: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]
Attachments: PT-2022-00303 – Sealed Order Dated 13 November 2025 for the Hearing of the 2025 Review of the Final Injunction Order (1).pdf; PT-20220-00303 – Amended Gleeson Order dated 6 October 2023 (amended pursuant to the Order of Master Kaye dated 13 November 2025) (1).pdf

Importance: High

Dear Shut the System

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

By an Order made by Mr Simon Gleeson (sitting as a Judge of the Chancery Division) on 6 October 2023 (the "**Order**"), the Court granted final injunctive relief to the Claimants in respect of Buncefield (Site 1) and Kingsbury (Site 2) as further described in Schedule 2 of the Order.

A copy of the Order, together with all relevant documents in respect of that Order and the proceedings can be found at the following weblink: ukop.azurewebsites.net - /

Paragraph 12 of the Order provides that there shall be, on or around the anniversary of the Order (being 6 October each year), subject to Court availability a hearing to review the final injunction Order with a time estimate of 2.5 hours plus reading time. The most recent review of the Order was heard on Thursday 13 November 2025 before Master Kaye (the "**Hearing**"). Prior to the Hearing, the Claimants made an application to Court that an order be made permitting the Claimants to amend the Claim Form and Particulars of Claim to change the description of the Defendants and that the Order be amended to change the description of the Defendants accordingly (the "**Application**").

At the Hearing, the Court made no order as to the continuing effect of the Order and granted the Claimants' Application, permitting the Claimants to amend the Claim Form and Particulars of Claim to change the description of the Defendants and that the Order be amended to change the description of the Defendants accordingly.

Pursuant to paragraph 6(d) and 9(b) of the Amended Gleeson Order, the Claimants are now required to:

1. send an email to this email address with the information that copies of the Order may be viewed at the web link referred to below; and

2. serve any future applications, any other documents, any notice of hearings in the Claim by the Claimants and their evidence in support on you.

Therefore, by way of service for and on behalf of the Claimants, a copy of:

a. the Order made Master Kaye on 13 November 2025; and

b. the amended Order made by Mr Simon Gleeson (sitting as a Judge of the Chancery Division) on 6 October 2023 (the "**Amended Gleeson Order**")

are attached to this email and can also be found at the following weblink: ukop.azurewebsites.net - /

Yours faithfully,

Fieldfisher

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

Cole Cannings

From: Cole Cannings
Sent: 07 January 2026 11:13
To: campaigner@fossilfreelondon.org; operations@fossilfreelondon.org
Cc: UKOP injunction
Subject: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]
Attachments: PT-2022-00303 – Sealed Order Dated 13 November 2025 for the Hearing of the 2025 Review of the Final Injunction Order (1).pdf; PT-20220-00303 – Amended Gleeson Order dated 6 October 2023 (amended pursuant to the Order of Master Kaye dated 13 November 2025) (1).pdf

Importance: High

Dear Fossil Free London

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

By an Order made by Mr Simon Gleeson (sitting as a Judge of the Chancery Division) on 6 October 2023 (the "**Order**"), the Court granted final injunctive relief to the Claimants in respect of Buncefield (Site 1) and Kingsbury (Site 2) as further described in Schedule 2 of the Order.

A copy of the Order, together with all relevant documents in respect of that Order and the proceedings can be found at the following weblink: ukop.azurewebsites.net - /

Paragraph 12 of the Order provides that there shall be, on or around the anniversary of the Order (being 6 October each year), subject to Court availability a hearing to review the final injunction Order with a time estimate of 2.5 hours plus reading time. The most recent review of the Order was heard on Thursday 13 November 2025 before Master Kaye (the "**Hearing**"). Prior to the Hearing, the Claimants made an application to Court that an order be made permitting the Claimants to amend the Claim Form and Particulars of Claim to change the description of the Defendants and that the Order be amended to change the description of the Defendants accordingly (the "**Application**").

At the Hearing, the Court made no order as to the continuing effect of the Order and granted the Claimants' Application, permitting the Claimants to amend the Claim Form and Particulars of Claim to change the description of the Defendants and that the Order be amended to change the description of the Defendants accordingly.

Pursuant to paragraph 6(d) and 9(b) of the Amended Gleeson Order, the Claimants are now required to:

1. send an email to this email address with the information that copies of the Order may be viewed at the web link referred to below; and

2. serve any future applications, any other documents, any notice of hearings in the Claim by the Claimants and their evidence in support on you.

Therefore, by way of service for and on behalf of the Claimants, a copy of:

a. the Order made Master Kaye on 13 November 2025; and

b. the amended Order made by Mr Simon Gleeson (sitting as a Judge of the Chancery Division) on 6 October 2023 (the "**Amended Gleeson Order**")

are attached to this email and can also be found at the following weblink: ukop.azurewebsites.net - /

Yours faithfully,

Fieldfisher

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

Cole Cannings

From: Cole Cannings
Sent: 07 January 2026 11:16
To: press@citizensarrestnetwork.org; crew@citizensarrestnetwork.org
Cc: UKOP injunction
Subject: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]
Attachments: PT-2022-00303 – Sealed Order Dated 13 November 2025 for the Hearing of the 2025 Review of the Final Injunction Order (1).pdf; PT-20220-00303 – Amended Gleeson Order dated 6 October 2023 (amended pursuant to the Order of Master Kaye dated 13 November 2025) (1).pdf

Importance: High

Dear Citizen's Arrest Network

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

By an Order made by Mr Simon Gleeson (sitting as a Judge of the Chancery Division) on 6 October 2023 (the "**Order**"), the Court granted final injunctive relief to the Claimants in respect of Buncefield (Site 1) and Kingsbury (Site 2) as further described in Schedule 2 of the Order.

A copy of the Order, together with all relevant documents in respect of that Order and the proceedings can be found at the following weblink: ukop.azurewebsites.net - /

Paragraph 12 of the Order provides that there shall be, on or around the anniversary of the Order (being 6 October each year), subject to Court availability a hearing to review the final injunction Order with a time estimate of 2.5 hours plus reading time. The most recent review of the Order was heard on Thursday 13 November 2025 before Master Kaye (the "**Hearing**"). Prior to the Hearing, the Claimants made an application to Court that an order be made permitting the Claimants to amend the Claim Form and Particulars of Claim to change the description of the Defendants and that the Order be amended to change the description of the Defendants accordingly (the "**Application**").

At the Hearing, the Court made no order as to the continuing effect of the Order and granted the Claimants' Application, permitting the Claimants to amend the Claim Form and Particulars of Claim to change the description of the Defendants and that the Order be amended to change the description of the Defendants accordingly.

Pursuant to paragraph 6(d) and 9(b) of the Amended Gleeson Order, the Claimants are now required to:

1. send an email to this email address with the information that copies of the Order may be viewed at the web link referred to below; and

2. serve any future applications, any other documents, any notice of hearings in the Claim by the Claimants and their evidence in support on you.

Therefore, by way of service for and on behalf of the Claimants, a copy of:

a. the Order made Master Kaye on 13 November 2025; and

b. the amended Order made by Mr Simon Gleeson (sitting as a Judge of the Chancery Division) on 6 October 2023 (the "**Amended Gleeson Order**")

are attached to this email and can also be found at the following weblink: ukop.azurewebsites.net - /

Yours faithfully,

Fieldfisher

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

APPENDIX 7

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

Cole Cannings

From: Microsoft Outlook
To: info@juststopoil.org; juststopoil@protonmail.com; juststopoilpress@protonmail.com
Sent: 07 January 2026 11:03
Subject: Relayed: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

info@juststopoil.org (info@juststopoil.org)

juststopoil@protonmail.com (juststopoil@protonmail.com)

juststopoilpress@protonmail.com (juststopoilpress@protonmail.com)

Subject: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

Cole Cannings

From: Microsoft Outlook
To: xr-legal@riseup.net
Sent: 07 January 2026 11:05
Subject: Relayed: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

xr-legal@riseup.net (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]

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

Cole Cannings

From: xr-legal@riseup.net
Sent: 07 January 2026 11:06
To: Cole Cannings
Subject: Autoreply for XR Legal Support

Hi there,

Thanks for getting in touch with the XR Legal Support Team.

We have received your email and are working on getting a response to you ASAP! We are currently quite low in capacity and so our response to your email(s) might be delayed.

If you don't hear from us within two weeks, please email back and we will do our best to get to you sooner.

In the meantime, please have a look at our website (https://www.informeddissent.info), as this may have information to answer your questions.

If your email is related to an upcoming court appearance, we will prioritise your email and get a response to you ASAP. Please also email the XR Legal Fund team to ensure you have the relevant support (legalfinancialsupport@riseup.net) with the details of your court date.

In Solidarity,
XR Legal Support Team

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

Cole Cannings

From: Microsoft Outlook
To: youthdemandpress@protonmail.com; youthdemand@proton.me
Sent: 07 January 2026 11:10
Subject: Relayed: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

youthdemandpress@protonmail.com (youthdemandpress@protonmail.com)

youthdemand@proton.me (youthdemand@proton.me)

Subject: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

Cole Cannings

From: Microsoft Outlook
To: shut_the_system_info@proton.me
Sent: 07 January 2026 11:12
Subject: Relayed: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

shut_the_system_info@proton.me (shut_the_system_info@proton.me)

Subject: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

Cole Cannings

From: Microsoft Outlook
To: operations@fossilfreelondon.org; campaigner@fossilfreelondon.org
Sent: 07 January 2026 11:14
Subject: Relayed: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

operations@fossilfreelondon.org (operations@fossilfreelondon.org)

campaigner@fossilfreelondon.org (campaigner@fossilfreelondon.org)

Subject: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Docusign Envelope ID: 1949D3BD-7ECF-4A82-8A18-943B3C19BAEC

Cole Cannings

From: Microsoft Outlook
To: crew@citizensarrestnetwork.org; press@citizensarrestnetwork.org
Sent: 07 January 2026 11:17
Subject: Relayed: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

crew@citizensarrestnetwork.org (crew@citizensarrestnetwork.org)

press@citizensarrestnetwork.org (press@citizensarrestnetwork.org)

Subject: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Certificate of service

Name of court	Claim No.
HIGH COURT OF JUSTICE, BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES, BUSINESS AND PROPERTY DIVSISION PROPERTY TRUST AND PROBATE LIST	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, 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 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, 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 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)

On what day did you serve? 16 / 11 / 2026

The date of service is 16 / 11 / 2026

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

(a) Draft Order;
(b) Eighth Witness Statement of John Michael Armstrong dated 16 November 2026;
(c) Exhibit UKOP20; and
(d) Sixth Witness Statement of Antony Douglas Phillips dated 19 January 2026 and accompanying Exhibit UKOP19

(together, the **"Court Documents"**)

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

The First and Second Defendants pursuant to paragraph 9 of 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 (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

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

Service was effected:

(a) on the web link specified in paragraph 9(a) of the Order (https://ukop.azurewebsites.net); and

[ ] by personally handing it to or leaving it with (.....time left, where document is other than a claim form) *(please specify)*

[X] by other means permitted by the court *(please specify)*

Pursuant to paragraph 9 of the Order:

1. Service of the Court Documents was effected between 13:24 and 13:31 on 16 November 2026 by uploading the Court Documents to https://ukop.azurewebsites.net. A copy of the web link page is at **Appendix 1** to this certificate of service.

2. Service of the Court Documents was further effected on 16 November 2026 by an email being sent to the following email addresses at the times specified below:

info@juststopoil.org, juststopoil@protonmail.com, & juststopoilpress@protonmail.com at 15:06;

xr-legal@riseup.net at 15:07;

youthdemand@proton.me and youthdemandpress@protonmail.com at 15:08;

shut_the_system_info@proton.me at 15:08;

campaigner@fossilfreelondon.org & operations@fossilfreelondon.org at 15:09; and

press@citizensarrestnetwork.org & crew@citizensarrestnetwork.org at 15:10

setting out that a copy of the Court Documents, together with all relevant documents in respect of the Order and the proceedings can be found at the following link: https://ukop.azurewebsites.net

Copies of the emails are at **Appendix 2** to this certificate of service. Copies of the delivery receipts and the automatic reply received from xr-legal@riseup.net are at **Appendix 3** to this certificate of service.

[ ] 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)*

(b) at the email addresses specified in paragraph 9(b) of the Order:

(i) xr-legal@riseup.net;
(ii) juststopoilpress@protonmail.com;
(iii) info@juststopoil.org;
(iv) juststopoil@protonmail.com
(v) youthdemand@proton.me;
(vi) youthdemandpress@protonmail.com;
(vii) shut_the_system_info@proton.me;
(viii) campaigner@fossilfreelondon.org;
(ix) operations@fossilfreelondon.org;
(x) press@citizensarrestnetwork.org; and
(xi) crew@citizensarrestnetwork.org.

Being the [ ] claimant's [X] 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
[X] other *(please specify)*

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

Full name: ANTONY DOUGLAS PHILLIPS

Signed: 

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

Position or office held: Partner

(If signing on behalf of firm or company)

Date: 17 11 2026

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

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
4/25/2022 5:16 PM	304635	(2022.04.25) Claimants_ Solicitors Note of Return Date Injunction Hearing dated 20 April 2022 - 103566927_1.PDF
10/27/2025 3:09 PM	232235	Application Notice dated 24.10.25 - Claimant's Application to amend description of Defendants.pdf
4/5/2023 4:45 PM	3468912	Application notice- dated 04.04.23- for return hearing on 20.04.23 - 110797879_1.pdf
11/4/2024 4:41 PM	153722	Application notice- dated 04.11.24- for review of final injunction Order 2024.pdf
4/19/2022 4:23 PM	84022730	Bundle 1 of 2 for Return Date Hearing on 20 April 2022 (comprising the Bundle for Interim Injunction Hearing on 8 Apr
4/19/2022 4:24 PM	90211815	Bundle 2 of 2 for Return Date Hearing on 20 April 2022 (as updated on 19 April 2022) - 103442287_1.pdf
9/29/2023 4:50 PM	4149429	Bundle of Authorities for Application for Summary Judgment.pdf
11/14/2024 4:18 PM	4091146	Bundle of Authorities for Hearing of the Review of the Final Injunction Order 2024.pdf
4/17/2023 12:26 PM	2325296	Bundle of Authorities for Return Date Hearing on 20 April 2023.pdf
9/29/2023 4:50 PM	68020	Claimant's skeleton argument for Application for Summary Judgment.docx
4/14/2022 4:00 PM	389745	Claimant's skeleton argument for return date hearing on 20.4.2022.pdf
11/14/2024 4:18 PM	252793	Claimants Skeleton Argument for Hearing of the Review of the Final Injunction Order 2024.pdf
11/5/2025 1:59 PM	246455	Claimants' Skeleton Argument dated 5.11.25.pdf
4/17/2023 12:26 PM	189540	Claimants' Skeleton Argument for Return Date Hearing on 20 April 2023.pdf
4/8/2022 8:44 PM	887760	Defendant Response Pack - 103297040_1.pdf
11/4/2024 4:41 PM	19227	Draft Order - dated 04.11.24- for review of final injunction Order 2024.docx
11/16/2026 1:29 PM	105981	Draft Order for 2026 Review Hearing.pdf
10/27/2025 3:09 PM	2531562	Draft Order for Claimant's Application dated 24.10.25.pdf
7/10/2023 5:44 PM	1566913	Draft Order for Claimants Summary Judgment Application dated 7 July 2023 - 112689563_1.PDF
4/8/2022 8:27 PM	1061012	Draft Order for Return Date Hearing (08.04.2022) - 103296915_1.DOCX
4/5/2023 4:47 PM	1724018	Draft Order for Return Date Hearing on 20.04.23 - dated 04.04.23 - 110800165_1.pdf
11/16/2026 1:24 PM	443263	Eighth Witness Statement of John M Armstrong dated 16 November 2026 - 146044442_1.pdf
7/11/2023 11:09 AM	7660669	Exhibit UKOP10 - 112418041_1.pdf
9/27/2023 12:37 PM	3163596	Exhibit UKOP11 - 112805652_1.pdf
9/27/2023 2:50 PM	64090567	Exhibit UKOP12 - 114360329_1.pdf
11/4/2024 4:47 PM	126110953	Exhibit UKOP14.pdf
10/27/2025 3:09 PM	53427720	Exhibit UKOP17.pdf
11/3/2025 2:34 PM	3072121	Exhibit UKOP18.pdf
11/16/2026 1:31 PM	22652575	Exhibit UKOP19.pdf
11/16/2026 1:30 PM	55421268	Exhibit UKOP20.pdf
4/5/2023 4:50 PM	88150000	Exhibit UKOP6 - 110755402_1.pdf
4/5/2023 4:52 PM	397591	Exhibit UKOP7 - 110744707_1.pdf
7/11/2023 11:09 AM	76198598	Exhibit UKOP9 - 112555309_1.pdf
11/3/2025 2:34 PM	255910	Fifth Witness Statement of Antony Douglas Phillips dated 31.10.25.pdf
9/27/2023 12:37 PM	287645	Fifth Witness Statement of John Michael Armstrong dated 22 September 2023 - 114373547_1.pdf
10/13/2023 12:02 PM	1014976	Final Sealed Order dated 12 October 2023 in relation to the application for summary judgment.pdf
4/21/2022 10:30 AM	1515942	Final Sealed Order for Return Date Hearing - (20.04.2022) - 103487582_1.PDF
9/27/2023 12:37 PM	259226	First Witness Statement of Antony Douglas Phillips dated 24 July 2023 - 113030926_1.pdf
4/8/2022 8:27 PM	4712019	First Witness Statement of Daniel Owen Christopher Talfan Davies dated 8 April 2022 together with Exhibit UKOP3 - 103
7/10/2023 5:44 PM	404212	Fourth Witness Statement of John Armstrong dated 6 July 2023 - 112644075_1.PDF
9/22/2025 5:37 PM	120670	Notice of Appointment to Fix A Date For Hearing - dated 18 September 2025.pdf
10/8/2024 11:29 AM	1048540	Notice of appointment to fix a date for the hearing dated 2 October 2024.pdf
10/23/2024 11:00 AM	127180	Notice of Hearing Date dated 23 October 2024.pdf
10/16/2026 3:58 PM	253190	Notice of Hearing dated 14 October 2026 - PT-2022-000303.pdf
10/1/2025 9:28 AM	93925	Notice of Hearing dated 29 September 2025.pdf
10/4/2023 12:14 PM	529121	Notice of Hearing from Claimant's Application for Summary Judgment dated 3 October 2023.pdf
9/27/2023 2:51 PM	42712595	PT-2022-000303 - _EB1_ Bundle 1 of 3 - Exhibit Bundle for Application for Summary Judgment - 114283607_2.pdf
9/27/2023 2:53 PM	351457212	PT-2022-000303 - _EB2_ Bundle 2 of 3 - Exhibit Bundle for Application for Summary Judgment - 114461165_1.pdf
9/27/2023 2:52 PM	70565567	PT-2022-000303 - _EB3_ Bundle 3 of 3 - Exhibit Bundle for Application for Summary Judgment - 114461173_1.pdf
4/8/2022 8:27 PM	991217	PT-2022-000303 - Application Notice for Interim Injunction Hearing dated 7 April 2022 - 103296911_1.PDF
11/5/2025 1:59 PM	5026737	PT-2022-000303 - Authorities Bundle for Use at Hearing of 2025 Review of the Final Injunction Order.pdf
4/17/2023 11:19 AM	178506009	PT-2022-000303 - Bundle 1 of 2 (Sections A, B, C & D) for Return Date Hearing on 20 April 2023 - 110913605_1.pdf
4/17/2023 11:19 AM	128567277	PT-2022-000303 - Bundle 2 of 2 (Sections E & F) for Return Date Hearing on 20 April 2023 - 110979467_1.pdf
11/3/2025 3:31 PM	25253927	PT-2022-000303 - Bundle for Use at Hearing of 2025 Review of the Final Injunction Order.pdf
9/27/2023 2:51 PM	77726087	PT-2022-000303 - Bundle for Use at Hearing of Application for Summary Judgment - 114461162_1.pdf
11/3/2025 3:31 PM	66418703	PT-2022-000303 - EB5 - Exhibit Bundle for Use at Hearing of 2025 Review of the Final Injunction Order.pdf
10/5/2026 12:10 PM	86120	PT-2022-000303 - Notice of Appointment to Fix A Date For Hearing - dated 1 October 2026.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
11/11/2024 4:15 PM	86098816	PT-2022-000303- Bundle for Use at Hearing of Review of the Final Injunction Order.pdf
11/11/2024 4:10 PM	194113078	PT-2022-000303- Exhibit Bundle for Hearing of the Review of the Final Injunction Order.pdf
10/4/2023 3:00 PM	97759798	PT-2022-000303- Revised Bundle for Use at Hearing of Application for Summary Judgment.pdf
1/5/2026 3:34 PM	3957578	PT-2022-00303 - Sealed Order Dated 13 November 2025 for the Hearing of the 2025 Review of the Final Injunction Order.
1/5/2026 3:34 PM	1349257	PT-20220-00303 - Amended Gleeson Order dated 6 October 2023 (amended pursuant to the Order of Master Kaye dated 13 No
11/6/2024 10:55 AM	1476949	Sealed Application Notice dated 04.11.24- for review of final injunction Order 2024.pdf
11/11/2024 10:30 AM	206819	Sealed Application Notice dated 4 November 2024 for review of final injunction Order 2024.pdf
10/30/2025 2:19 PM	312825	Sealed Application Notice for Claimant's Application dated 24.10.25.pdf
7/10/2023 5:44 PM	3200464	Sealed Application Notice - Claimants Summary Judgment Application dated 7 July 2023 containing details of listing ap
7/18/2023 1:04 PM	5203376	Sealed Application Notice- Claimants Summary Judgment Application dated 7 July 2023 containing Notice of hearing - 11
11/26/2024 2:23 PM	1215705	Sealed Order dated 20 November 2024 for the Hearing of the Review of the Final Injunction Order 2024.pdf
4/24/2023 10:19 AM	1966334	Sealed Order dated 21 April 2023 in relation to Return Date Hearing on 20 April 2023 - 111142819_1.PDF
4/12/2022 11:38 AM	3631509	Sealed Order dated 8 April 2022 in relation to interim injunction hearing - 103338343_1.PDF
4/5/2023 4:51 PM	265683	Second Witness Statement of Peter Malcolm Davis- dated 05.04.23 - 110813940_1.pdf
10/27/2025 3:09 PM	319730	Seventh Witness Statement of John M Armstrong dated 24.10.25.pdf
11/16/2026 1:24 PM	276856	Sixth Witness Statement of Antony Douglas Phillips - 19.1.26 (3).pdf
11/4/2024 4:41 PM	429056	Sixth Witness Statement of John Armstrong dated 4 November 2024.pdf
11/11/2024 4:02 PM	1827776	Third Witness Statement of Antony Douglas Phillips dated 11 November 2024.pdf
4/5/2023 4:49 PM	385903	Third Witness Statement of John Michael Armstrong- dated 05.04.23 - 110812946_1.pdf
7/10/2023 5:44 PM	460580	Third Witness Statement of Peter Davis dated 5 July 2023 - 112638588_1.PDF
11/11/2024 4:08 PM	4957678	UKOP15.pdf
11/16/2026 1:51 PM	152	web.config

APPENDIX 2

From:	Cole Cannings
Sent:	16 November 2026 15:06
To:	info@juststopoil.org; juststopoilpress@protonmail.com; juststopoil@protonmail.com
Cc:	UKOP injunction
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

As you are aware, we act for (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited (the **"Claimants"**).

We write further to our emails dated 5 October 2026 and 16 October 2026 and we adopt the definitions used in those emails for ease.

As outlined in our email dated 16 October 2026, the hearing to review the final injunction Order has been listed in a three-day window from 1 December 2026 with a time estimate of ½ day (the **"Hearing"**).

In advance of the Hearing, the Claimants have filed further evidence at Court in accordance with paragraph 13 of the Order.

A copy of the further evidence in the form of:

1. Eighth Witness Statement of John Michael Armstrong dated 16 November 2026;
2. Exhibit UKOP20;
3. Draft Order; and
4. Sixth Witness Statement of Antony Phillips dated 19 January 2026 and accompanying Exhibit UKOP19

can be viewed at the following weblink:

https://ukop.azurewebsites.net

Any individual who wishes to come forward to defend the proceedings is entitled to file a skeleton argument not less than 3 days before the date of any hearing.

We confirm that we are authorised to accept service for and on behalf of the Claimants and that service of any evidence or skeleton arguments can be affected by emailing the relevant documents to the following email address:

UKOPinjunction@fieldfisher.com

Yours faithfully

Fieldfisher LLP

Cole Cannings
Solicitor
D: +44 330 236 773
8

From:	Cole Cannings
Sent:	16 November 2026 15:07
To:	xr-legal@riseup.net
Cc:	UKOP injunction
Subject:	(1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Dear Extinction Rebellion

As you are aware, we act for (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited (the **"Claimants"**).

We write further to our emails dated 5 October 2026 and 16 October 2026 and we adopt the definitions used in those emails for ease.

As outlined in our email dated 16 October 2026, the hearing to review the final injunction Order has been listed in a three-day window from 1 December 2026 with a time estimate of ½ day (the **"Hearing"**).

In advance of the Hearing, the Claimants have filed further evidence at Court in accordance with paragraph 13 of the Order.

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3. Draft Order; and
4. Sixth Witness Statement of Antony Phillips dated 19 January 2026 and accompanying Exhibit UKOP19

can be viewed at the following weblink:

https://ukop.azurewebsites.net

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We confirm that we are authorised to accept service for and on behalf of the Claimants and that service of any evidence or skeleton arguments can be affected by emailing the relevant documents to the following email address:

UKOPinjunction@fieldfisher.com

Yours faithfully

Fieldfisher LLP

From:	Cole Cannings
Sent:	16 November 2026 15:08
To:	youthdemandpress@protonmail.com; youthdemand@proton.me
Cc:	UKOP injunction
Subject:	(1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Dear Youth Demand

As you are aware, we act for (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited (the **"Claimants"**).

We write further to our emails dated 5 October 2026 and 16 October 2026 and we adopt the definitions used in those emails for ease.

As outlined in our email dated 16 October 2026, the hearing to review the final injunction Order has been listed in a three-day window from 1 December 2026 with a time estimate of ½ day (the **"Hearing"**).

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2. Exhibit UKOP20;
3. Draft Order; and
4. Sixth Witness Statement of Antony Phillips dated 19 January 2026 and accompanying Exhibit UKOP19

can be viewed at the following weblink:

https://ukop.azurewebsites.net

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UKOPinjunction@fieldfisher.com

Yours faithfully

Fieldfisher LLP

Cole Cannings
Solicitor
D: +44 330 236 773
8

From:	Cole Cannings
Sent:	16 November 2026 15:08
To:	shut_the_system_info@proton.me
Cc:	UKOP injunction
Subject:	(1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Dear Shut the System

As you are aware, we act for (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited (the **"Claimants"**).

We write further to our emails dated 5 October 2026 and 16 October 2026 and we adopt the definitions used in those emails for ease.

As outlined in our email dated 16 October 2026, the hearing to review the final injunction Order has been listed in a three-day window from 1 December 2026 with a time estimate of ½ day (the **"Hearing"**).

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2. Exhibit UKOP20;
3. Draft Order; and
4. Sixth Witness Statement of Antony Phillips dated 19 January 2026 and accompanying Exhibit UKOP19

can be viewed at the following weblink:

https://ukop.azurewebsites.net

Any individual who wishes to come forward to defend the proceedings is entitled to file a skeleton argument not less than 3 days before the date of any hearing.

We confirm that we are authorised to accept service for and on behalf of the Claimants and that service of any evidence or skeleton arguments can be affected by emailing the relevant documents to the following email address:

UKOPinjunction@fieldfisher.com

Yours faithfully

Fieldfisher LLP

Cole Cannings
Solicitor
D: +44 330 236 773
8

From:	Cole Cannings
Sent:	16 November 2026 15:09
To:	Lucy Campaigner; operations@fossilfreelondon.org
Cc:	UKOP injunction
Subject:	(1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Dear Fossil Free London

As you are aware, we act for (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited (the **"Claimants"**).

We write further to our emails dated 5 October 2026 and 16 October 2026 and we adopt the definitions used in those emails for ease.

As outlined in our email dated 16 October 2026, the hearing to review the final injunction Order has been listed in a three-day window from 1 December 2026 with a time estimate of ½ day (the **"Hearing"**).

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2. Exhibit UKOP20;
3. Draft Order; and
4. Sixth Witness Statement of Antony Phillips dated 19 January 2026 and accompanying Exhibit UKOP19

can be viewed at the following weblink:

https://ukop.azurewebsites.net

Any individual who wishes to come forward to defend the proceedings is entitled to file a skeleton argument not less than 3 days before the date of any hearing.

We confirm that we are authorised to accept service for and on behalf of the Claimants and that service of any evidence or skeleton arguments can be affected by emailing the relevant documents to the following email address:

UKOPinjunction@fieldfisher.com

Yours faithfully

Fieldfisher LLP

Cole Cannings
Solicitor
D: +44 330 236 773
8

From:	Cole Cannings
Sent:	16 November 2026 15:10
To:	press@citizensarrestnetwork.org; crew@citizensarrestnetwork.org
Cc:	UKOP injunction
Subject:	(1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Dear Citizens Arrest Network

As you are aware, we act for (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited (the **"Claimants"**).

We write further to our emails dated 5 October 2026 and 16 October 2026 and we adopt the definitions used in those emails for ease.

As outlined in our email dated 16 October 2026, the hearing to review the final injunction Order has been listed in a three-day window from 1 December 2026 with a time estimate of ½ day (the **"Hearing"**).

In advance of the Hearing, the Claimants have filed further evidence at Court in accordance with paragraph 13 of the Order.

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2. Exhibit UKOP20;
3. Draft Order; and
4. Sixth Witness Statement of Antony Phillips dated 19 January 2026 and accompanying Exhibit UKOP19

can be viewed at the following weblink:

https://ukop.azurewebsites.net

Any individual who wishes to come forward to defend the proceedings is entitled to file a skeleton argument not less than 3 days before the date of any hearing.

We confirm that we are authorised to accept service for and on behalf of the Claimants and that service of any evidence or skeleton arguments can be affected by emailing the relevant documents to the following email address:

UKOPinjunction@fieldfisher.com

Yours faithfully

Fieldfisher LLP

Cole Cannings
Solicitor
D: +44 330 236 773
8

APPENDIX 3

From:	Microsoft Outlook
Sent:	16 November 2026 15:07
To:	info@juststopoil.org; juststopoilpress@protonmail.com; juststopoil@protonmail.com
Subject:	Relayed: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]
Attachments:	(1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501].msg

---

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

info@juststopoil.org (info@juststopoil.org)

juststopoilpress@protonmail.com (juststopoilpress@protonmail.com)

juststopoil@protonmail.com (juststopoil@protonmail.com)

Subject: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

From:	Microsoft Outlook
Sent:	16 November 2026 15:07
To:	xr-legal@riseup.net
Subject:	Relayed: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]
Attachments:	(1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501].msg

---

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

xr-legal@riseup.net (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]

From:	Microsoft Outlook
Sent:	16 November 2026 15:08
To:	youthdemandpress@protonmail.com
Subject:	Relayed: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]
Attachments:	(1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501].msg

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Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

youthdemandpress@protonmail.com (youthdemandpress@protonmail.com)

Subject: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

From:	Microsoft Outlook
Sent:	16 November 2026 15:08
To:	youthdemand@proton.me
Subject:	Relayed: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]
Attachments:	(1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501].msg

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Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

youthdemand@proton.me (youthdemand@proton.me)

Subject: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

From:	Microsoft Outlook
Sent:	16 November 2026 15:09
To:	shut_the_system_info@proton.me
Subject:	Relayed: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]
Attachments:	(1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501].msg

---

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

shut_the_system_info@proton.me (shut_the_system_info@proton.me)

Subject: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

From:	Microsoft Outlook
Sent:	16 November 2026 15:09
To:	Lucy Campaigner
Subject:	Relayed: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]
Attachments:	(1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501].msg

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Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

Lucy Campaigner (campaigner@fossilfreelondon.org)

Subject: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

From:	Microsoft Outlook
Sent:	16 November 2026 15:09
To:	operations@fossilfreelondon.org
Subject:	Relayed: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]
Attachments:	(1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501].msg

---

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

operations@fossilfreelondon.org (operations@fossilfreelondon.org)

Subject: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

From:	Microsoft Outlook
Sent:	16 November 2026 15:10
To:	crew@citizensarrestnetwork.org; press@citizensarrestnetwork.org
Subject:	Relayed: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]
Attachments:	(1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501].msg

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Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

crew@citizensarrestnetwork.org (crew@citizensarrestnetwork.org)

press@citizensarrestnetwork.org (press@citizensarrestnetwork.org)

Subject: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

From: xr-legal@riseup.net <xr-legal@riseup.net>
Sent: 16 November 2026 15:08
To: Cole Cannings
Subject: Autoreply for XR Legal Support

Hi there,

Thanks for getting in touch with the XR Legal Support Team.

We have received your email and are working on getting a response to you ASAP! We are currently quite low in capacity and so our response to your email(s) might be delayed.

If you don't hear from us within two weeks, please email back and we will do our best to get to you sooner.

In the meantime, please have a look at our website (https://www.informeddissent.info), as this may have information to answer your questions.

If your email is related to an upcoming court appearance, we will prioritise your email and get a response to you ASAP. Please also email the XR Legal Fund team to ensure you have the relevant support (legalfinancialsupport@riseup.net) with the details of your court date.

In Solidarity,
XR Legal Support Team

Certificate of service

Name of court	Claim No.
HIGH COURT OF JUSTICE, BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES, BUSINESS AND PROPERTY DIVSISION PROPERTY TRUST AND PROBATE LIST	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, 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 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, 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 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)

On what day did you serve? 16 / 10 / 2026

The date of service is 17 / 10 / 2026

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

The Notice of Hearing dated 14 October 2026 (the "**Notice**")

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

The First and Second Defendants pursuant to paragraph 9 of 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 (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

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

Service was effected:

(a) on the web link specified in paragraph 9(a) of the Order (https://ukop.azurewebsites.net); and

(b) at the email addresses specified in paragraph 9(b) of the Order:
(i) xr-legal@riseup.net;
(ii) juststopoilpress@protonmail.com;

claim form) *(please specify)*

[X] by other means permitted by the court *(please specify)*

Pursuant to paragraph 9 of the Order:

1. Service of the Notice was effected at 15:58 on 16 October 2026 by uploading the Notice to https://ukop.azurewebsites.net. A copy of the web link page is at **Appendix 1** to this certificate of service.

2. Service of the Notice was further effected on 16 October 2026 by an email being sent to the following email addresses at the times specified below:

info@juststopoil.org, juststopoil@protonmail.com, & juststopoilpress@protonmail.com at 17:16

xr-legal@riseup.net at 17:17

youthdemand@proton.me and youthdemandpress@protonmail.com at 17:18

shut_the_system_info@proton.me at 17:19

campaigner@fossilfreelondon.org & operations@fossilfreelondon.org at 17:19; and

press@citizensarrestnetwork.org & crew@citizensarrestnetwork.org at 17:19

Those emails attached a copy of the Notice and also set out that a copy of the Noice could be found at the following link: https://ukop.azurewebsites.net

Copies of the emails are at **Appendix 2** to this certificate of service. Copies of the delivery receipts and the automatic reply received from xr-legal@riseup.net and from campaigner@fossilfreelondon.org are at **Appendix 3** to this certificate of service.

[ ] 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)*

(iii) info@juststopoil.org;
(iv) juststopoil@protonmail.com
(v) youthdemand@proton.me;
(vi) youthdemandpress@protonmail.com;
(vii) shut_the_system_info@proton.me;
(viii) campaigner@fossilfreelondon.org;
(ix) operations@fossilfreelondon.org;
(x) press@citizensarrestnetwork.org; and
(xi) crew@citizensarrestnetwork.org.

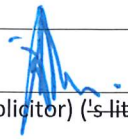
Being the [ ] claimant's [X] defendant's

[ ] 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
[X] other *(please specify)*

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

Full name: ANTONY DOUGLAS PHILLIPS

Signed: 

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

Position or office held: Partner

(If signing on behalf of firm or company)

Date: 17 11 2026

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

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
4/25/2022 5:16 PM	304635	(2022.04.25) Claimants_ Solicitors Note of Return Date Injunction Hearing dated 20 April 2022 - 103566927_1.PDF
10/27/2025 3:09 PM	232235	Application Notice dated 24.10.25 - Claimant's Application to amend description of Defendants.pdf
4/5/2023 4:45 PM	3468912	Application notice- dated 04.04.23- for return hearing on 20.04.23 - 110797879_1.pdf
11/4/2024 4:41 PM	153722	Application notice- dated 04.11.24- for review of final injunction Order 2024.pdf
4/19/2022 4:23 PM	84022730	Bundle 1 of 2 for Return Date Hearing on 20 April 2022 (comprising the Bundle for Interim Injunction Hearing on 8 Apr
4/19/2022 4:24 PM	90211815	Bundle 2 of 2 for Return Date Hearing on 20 April 2022 (as updated on 19 April 2022) - 103442287_1.pdf
9/29/2023 4:50 PM	4149429	Bundle of Authorities for Application for Summary Judgment.pdf
11/14/2024 4:18 PM	4091146	Bundle of Authorities for Hearing of the Review of the Final Injunction Order 2024.pdf
4/17/2023 12:26 PM	2325296	Bundle of Authorities for Return Date Hearing on 20 April 2023.pdf
9/29/2023 4:50 PM	68020	Claimant's skeleton argument for Application for Summary Judgment.docx
4/14/2022 4:00 PM	389745	Claimant's skeleton argument for return date hearing on 20.4.2022.pdf
11/14/2024 4:18 PM	252793	Claimants Skeleton Argument for Hearing of the Review of the Final Injunction Order 2024.pdf
11/5/2025 1:59 PM	246455	Claimants' Skeleton Argument dated 5.11.25.pdf
4/17/2023 12:26 PM	189540	Claimants' Skeleton Argument for Return Date Hearing on 20 April 2023.pdf
4/8/2022 8:44 PM	887760	Defendant Response Pack - 103297040_1.pdf
11/4/2024 4:41 PM	19227	Draft Order - dated 04.11.24- for review of final injunction Order 2024.docx
11/16/2026 1:29 PM	105981	Draft Order for 2026 Review Hearing.pdf
10/27/2025 3:09 PM	2531562	Draft Order for Claimant's Application dated 24.10.25.pdf
7/10/2023 5:44 PM	1566913	Draft Order for Claimants Summary Judgment Application dated 7 July 2023 - 112689563_1.PDF
4/8/2022 8:27 PM	1061012	Draft Order for Return Date Hearing (08.04.2022) - 103296915_1.DOCX
4/5/2023 4:47 PM	1724018	Draft Order for Return Date Hearing on 20.04.23 - dated 04.04.23 - 110800165_1.pdf
11/16/2026 1:24 PM	443263	Eighth Witness Statement of John M Armstrong dated 16 November 2026 - 146044442_1.pdf
7/11/2023 11:09 AM	7660669	Exhibit UKOP10 - 112418041_1.pdf
9/27/2023 12:37 PM	3163596	Exhibit UKOP11 - 112805652_1.pdf
9/27/2023 2:50 PM	64090567	Exhibit UKOP12 - 114360329_1.pdf
11/4/2024 4:47 PM	126110953	Exhibit UKOP14.pdf
10/27/2025 3:09 PM	53427720	Exhibit UKOP17.pdf
11/3/2025 2:34 PM	3072121	Exhibit UKOP18.pdf
11/16/2026 1:31 PM	22652575	Exhibit UKOP19.pdf
11/16/2026 1:30 PM	55421268	Exhibit UKOP20.pdf
4/5/2023 4:50 PM	88150000	Exhibit UKOP6 - 110755402_1.pdf
4/5/2023 4:52 PM	397591	Exhibit UKOP7 - 110744707_1.pdf
7/11/2023 11:09 AM	76198598	Exhibit UKOP9 - 112555309_1.pdf
11/3/2025 2:34 PM	255910	Fifth Witness Statement of Antony Douglas Phillips dated 31.10.25.pdf
9/27/2023 12:37 PM	287645	Fifth Witness Statement of John Michael Armstrong dated 22 September 2023 - 114373547_1.pdf
10/13/2023 12:02 PM	1014976	Final Sealed Order dated 12 October 2023 in relation to the application for summary judgment.pdf
4/21/2022 10:30 AM	1515942	Final Sealed Order for Return Date Hearing - (20.04.2022) - 103487582_1.PDF
9/27/2023 12:37 PM	259226	First Witness Statement of Antony Douglas Phillips dated 24 July 2023 - 113030926_1.pdf
4/8/2022 8:27 PM	4712019	First Witness Statement of Daniel Owen Christopher Talfan Davies dated 8 April 2022 together with Exhibit UKOP3 - 103
7/10/2023 5:44 PM	404212	Fourth Witness Statement of John Armstrong dated 6 July 2023 - 112644075_1.PDF
9/22/2025 5:37 PM	120670	Notice of Appointment to Fix A Date For Hearing - dated 18 September 2025.pdf
10/8/2024 11:29 AM	1048540	Notice of appointment to fix a date for the hearing dated 2 October 2024.pdf
10/23/2024 11:00 AM	127180	Notice of Hearing Date dated 23 October 2024.pdf
10/16/2026 3:58 PM	253190	Notice of Hearing dated 14 October 2026 - PT-2022-000303.pdf
10/1/2025 9:28 AM	93925	Notice of Hearing dated 29 September 2025.pdf
10/4/2023 12:14 PM	529121	Notice of Hearing from Claimant's Application for Summary Judgment dated 3 October 2023.pdf
9/27/2023 2:51 PM	42712595	PT-2022-000303 - _EB1_ Bundle 1 of 3 - Exhibit Bundle for Application for Summary Judgment - 114283607_2.pdf
9/27/2023 2:53 PM	351457212	PT-2022-000303 - _EB2_ Bundle 2 of 3 - Exhibit Bundle for Application for Summary Judgment - 114461165_1.pdf
9/27/2023 2:52 PM	70565567	PT-2022-000303 - _EB3_ Bundle 3 of 3 - Exhibit Bundle for Application for Summary Judgment - 114461173_1.pdf
4/8/2022 8:27 PM	991217	PT-2022-000303 - Application Notice for Interim Injunction Hearing dated 7 April 2022 - 103296911_1.PDF
11/5/2025 1:59 PM	5026737	PT-2022-000303 - Authorities Bundle for Use at Hearing of 2025 Review of the Final Injunction Order.pdf
4/17/2023 11:19 AM	178506009	PT-2022-000303 - Bundle 1 of 2 (Sections A, B, C & D) for Return Date Hearing on 20 April 2023 - 110913605_1.pdf
4/17/2023 11:19 AM	128567277	PT-2022-000303 - Bundle 2 of 2 (Sections E & F) for Return Date Hearing on 20 April 2023 - 110979467_1.pdf
11/3/2025 3:31 PM	25253927	PT-2022-000303 - Bundle for Use at Hearing of 2025 Review of the Final Injunction Order.pdf
9/27/2023 2:51 PM	77726087	PT-2022-000303 - Bundle for Use at Hearing of Application for Summary Judgment - 114461162_1.pdf
11/3/2025 3:31 PM	66418703	PT-2022-000303 - EB5 - Exhibit Bundle for Use at Hearing of 2025 Review of the Final Injunction Order.pdf
10/5/2026 12:10 PM	86120	PT-2022-000303 - Notice of Appointment to Fix A Date For Hearing - dated 1 October 2026.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
11/11/2024 4:15 PM	86098816	PT-2022-000303- Bundle for Use at Hearing of Review of the Final Injunction Order.pdf
11/11/2024 4:10 PM	194113078	PT-2022-000303- Exhibit Bundle for Hearing of the Review of the Final Injunction Order.pdf
10/4/2023 3:00 PM	97759798	PT-2022-000303- Revised Bundle for Use at Hearing of Application for Summary Judgment.pdf
1/5/2026 3:34 PM	3957578	PT-2022-00303 – Sealed Order Dated 13 November 2025 for the Hearing of the 2025 Review of the Final Injunction Order.
1/5/2026 3:34 PM	1349257	PT-20220-00303 – Amended Gleeson Order dated 6 October 2023 (amended pursuant to the Order of Master Kaye dated 13 No
11/6/2024 10:55 AM	1476949	Sealed Application Notice dated 04.11.24- for review of final injunction Order 2024.pdf
11/11/2024 10:30 AM	206819	Sealed Application Notice dated 4 November 2024 for review of final injunction Order 2024.pdf
10/30/2025 2:19 PM	312825	Sealed Application Notice for Claimant's Application dated 24.10.25.pdf
7/10/2023 5:44 PM	3200464	Sealed Application Notice – Claimants Summary Judgment Application dated 7 July 2023 containing details of listing ap
7/18/2023 1:04 PM	5203376	Sealed Application Notice- Claimants Summary Judgment Application dated 7 July 2023 containing Notice of hearing - 11
11/26/2024 2:23 PM	1215705	Sealed Order dated 20 November 2024 for the Hearing of the Review of the Final Injunction Order 2024.pdf
4/24/2023 10:19 AM	1966334	Sealed Order dated 21 April 2023 in relation to Return Date Hearing on 20 April 2023 - 111142819_1.PDF
4/12/2022 11:38 AM	3631509	Sealed Order dated 8 April 2022 in relation to interim injunction hearing - 103338343_1.PDF
4/5/2023 4:51 PM	265683	Second Witness Statement of Peter Malcolm Davis- dated 05.04.23 - 110813940_1.pdf
10/27/2025 3:09 PM	319730	Seventh Witness Statement of John M Armstrong dated 24.10.25.pdf
11/16/2026 1:24 PM	276856	Sixth Witness Statement of Antony Douglas Phillips - 19.1.26 (3).pdf
11/4/2024 4:41 PM	429056	Sixth Witness Statement of John Armstrong dated 4 November 2024.pdf
11/11/2024 4:02 PM	1827776	Third Witness Statement of Antony Douglas Phillips dated 11 November 2024.pdf
4/5/2023 4:49 PM	385903	Third Witness Statement of John Michael Armstrong- dated 05.04.23 - 110812946_1.pdf
7/10/2023 5:44 PM	460580	Third Witness Statement of Peter Davis dated 5 July 2023 - 112638588_1.PDF
11/11/2024 4:08 PM	4957678	UKOP15.pdf
11/16/2026 1:51 PM	152	web.config

APPENDIX 2

From:	Cole Cannings
Sent:	16 October 2026 17:16
To:	info@juststopoil.org; juststopoil@protonmail.com; juststopoilpress@protonmail.com
Cc:	UKOP injunction
Subject:	(1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]
Attachments:	Hearing Notice - PT-2022-000303 - 144744416_1.doc

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Dear Just Stop Oil

As you are aware, we act for (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline Storage Limited (the **"Claimants"**).

We write further to our email dated 5 October 2026 and we adopt the definitions used in that email for ease.

The Court has now issued a Notice of Hearing dated 14 October 2026 which provides that the hearing to review the final injunction Order has been listed in a three-day window from 1 December 2026 with a time estimate of ½ a day. A copy of the Notice of Hearing is attached and can be found at the following weblink:

https://ukop.azurewebsites.net

Any individual who wishes to come forward to defend the proceedings is entitled to file a skeleton argument not less than 3 days before the date of any hearing.

We confirm that we are authorised to accept service for and on behalf of the Claimants and that service of any evidence or skeleton arguments can be affected by emailing the relevant documents to the following email address:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher LLP

From:	Cole Cannings
Sent:	16 October 2026 17:17
To:	xr-legal@riseup.net
Cc:	UKOP injunction
Subject:	(1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]
Attachments:	Hearing Notice - PT-2022-000303 - 144744416_1.doc

---

Dear Extinction Rebellion

As you are aware, we act for (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline Storage Limited (the **"Claimants"**).

We write further to our email dated 5 October 2026 and we adopt the definitions used in that email for ease.

The Court has now issued a Notice of Hearing dated 14 October 2026 which provides that the hearing to review the final injunction Order has been listed in a three-day window from 1 December 2026 with a time estimate of ½ a day. A copy of the Notice of Hearing is attached and can be found at the following weblink:

https://ukop.azurewebsites.net

Any individual who wishes to come forward to defend the proceedings is entitled to file a skeleton argument not less than 3 days before the date of any hearing.

We confirm that we are authorised to accept service for and on behalf of the Claimants and that service of any evidence or skeleton arguments can be affected by emailing the relevant documents to the following email address:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher LLP

Cole Cannings
Solicitor
D: +44 330 236 773
8

From:	Cole Cannings
Sent:	16 October 2026 17:18
To:	youthdemand@proton.me; youthdemandpress@protonmail.com
Cc:	UKOP injunction
Subject:	(1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]
Attachments:	Hearing Notice - PT-2022-000303 - 144744416_1.doc

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Dear Youth Demand

As you are aware, we act for (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline Storage Limited (the **"Claimants"**).

We write further to our email dated 5 October 2026 and we adopt the definitions used in that email for ease.

The Court has now issued a Notice of Hearing dated 14 October 2026 which provides that the hearing to review the final injunction Order has been listed in a three-day window from 1 December 2026 with a time estimate of ½ a day. A copy of the Notice of Hearing is attached and can be found at the following weblink:

https://ukop.azurewebsites.net

Any individual who wishes to come forward to defend the proceedings is entitled to file a skeleton argument not less than 3 days before the date of any hearing.

We confirm that we are authorised to accept service for and on behalf of the Claimants and that service of any evidence or skeleton arguments can be affected by emailing the relevant documents to the following email address:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher LLP

From:	Cole Cannings
Sent:	16 October 2026 17:19
To:	shut_the_system_info@proton.me
Cc:	UKOP injunction
Subject:	(1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]
Attachments:	Hearing Notice - PT-2022-000303 - 144744416_1.doc

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Dear Shut the System

As you are aware, we act for (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline Storage Limited (the **"Claimants"**).

We write further to our email dated 5 October 2026 and we adopt the definitions used in that email for ease.

The Court has now issued a Notice of Hearing dated 14 October 2026 which provides that the hearing to review the final injunction Order has been listed in a three-day window from 1 December 2026 with a time estimate of ½ a day. A copy of the Notice of Hearing is attached and can be found at the following weblink:

https://ukop.azurewebsites.net

Any individual who wishes to come forward to defend the proceedings is entitled to file a skeleton argument not less than 3 days before the date of any hearing.

We confirm that we are authorised to accept service for and on behalf of the Claimants and that service of any evidence or skeleton arguments can be affected by emailing the relevant documents to the following email address:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher LLP

Cole Cannings
Solicitor
D: +44 330 236 773
8

From:	Cole Cannings
Sent:	16 October 2026 17:19
To:	campaigner@fossilfreelondon.org; operations@fossilfreelondon.org
Cc:	UKOP injunction
Subject:	(1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]
Attachments:	Hearing Notice - PT-2022-000303 - 144744416_1.doc

---

Dear Fossil Free London

As you are aware, we act for (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline Storage Limited (the **"Claimants"**).

We write further to our email dated 5 October 2026 and we adopt the definitions used in that email for ease.

The Court has now issued a Notice of Hearing dated 14 October 2026 which provides that the hearing to review the final injunction Order has been listed in a three-day window from 1 December 2026 with a time estimate of ½ a day. A copy of the Notice of Hearing is attached and can be found at the following weblink:

https://ukop.azurewebsites.net

Any individual who wishes to come forward to defend the proceedings is entitled to file a skeleton argument not less than 3 days before the date of any hearing.

We confirm that we are authorised to accept service for and on behalf of the Claimants and that service of any evidence or skeleton arguments can be affected by emailing the relevant documents to the following email address:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher LLP

From:	Cole Cannings
Sent:	16 October 2026 17:19
To:	press@citizensarrestnetwork.org; crew@citizensarrestnetwork.org
Cc:	UKOP injunction
Subject:	(1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]
Attachments:	Hearing Notice - PT-2022-000303 - 144744416_1.doc

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Dear Citizen's Arrest Network

As you are aware, we act for (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline Storage Limited (the **"Claimants"**).

We write further to our email dated 5 October 2026 and we adopt the definitions used in that email for ease.

The Court has now issued a Notice of Hearing dated 14 October 2026 which provides that the hearing to review the final injunction Order has been listed in a three-day window from 1 December 2026 with a time estimate of ½ a day. A copy of the Notice of Hearing is attached and can be found at the following weblink:

https://ukop.azurewebsites.net

Any individual who wishes to come forward to defend the proceedings is entitled to file a skeleton argument not less than 3 days before the date of any hearing.

We confirm that we are authorised to accept service for and on behalf of the Claimants and that service of any evidence or skeleton arguments can be affected by emailing the relevant documents to the following email address:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher LLP

APPENDIX 3

From:	Microsoft Outlook
Sent:	16 October 2026 17:16
To:	info@juststopoil.org; juststopoil@protonmail.com; juststopoilpress@protonmail.com
Subject:	Relayed: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]
Attachments:	(1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501].msg

---

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

info@juststopoil.org (info@juststopoil.org)

juststopoil@protonmail.com (juststopoil@protonmail.com)

juststopoilpress@protonmail.com (juststopoilpress@protonmail.com)

Subject: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

From:	Microsoft Outlook
Sent:	16 October 2026 17:17
To:	xr-legal@riseup.net
Subject:	Relayed: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]
Attachments:	(1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501].msg

---

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

xr-legal@riseup.net (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]

From:	Microsoft Outlook
Sent:	16 October 2026 17:18
To:	youthdemandpress@protonmail.com; youthdemand@proton.me
Subject:	Relayed: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]
Attachments:	(1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501].msg

---

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

youthdemandpress@protonmail.com (youthdemandpress@protonmail.com)

youthdemand@proton.me (youthdemand@proton.me)

Subject: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

From:	Microsoft Outlook
Sent:	16 October 2026 17:19
To:	shut_the_system_info@proton.me
Subject:	Relayed: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]
Attachments:	(1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501].msg

---

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

shut_the_system_info@proton.me (shut_the_system_info@proton.me)

Subject: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

From:	Microsoft Outlook
Sent:	16 October 2026 17:19
To:	operations@fossilfreelondon.org; campaigner@fossilfreelondon.org
Subject:	Relayed: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]
Attachments:	(1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501].msg

---

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

operations@fossilfreelondon.org (operations@fossilfreelondon.org)

campaigner@fossilfreelondon.org (campaigner@fossilfreelondon.org)

Subject: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

From:	Microsoft Outlook
Sent:	16 October 2026 17:20
To:	crew@citizensarrestnetwork.org; press@citizensarrestnetwork.org
Subject:	Relayed: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]
Attachments:	(1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501].msg

---

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

crew@citizensarrestnetwork.org (crew@citizensarrestnetwork.org)

press@citizensarrestnetwork.org (press@citizensarrestnetwork.org)

Subject: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

From: xr-legal@riseup.net <xr-legal@riseup.net>
Sent: 16 October 2026 17:17
To: Cole Cannings
Subject: Autoreply for XR Legal Support

Hi there,

Thanks for getting in touch with the XR Legal Support Team.

We have received your email and are working on getting a response to you ASAP! We are currently quite low in capacity and so our response to your email(s) might be delayed.

If you don't hear from us within two weeks, please email back and we will do our best to get to you sooner.

In the meantime, please have a look at our website (https://www.informeddissent.info), as this may have information to answer your questions.

If your email is related to an upcoming court appearance, we will prioritise your email and get a response to you ASAP. Please also email the XR Legal Fund team to ensure you have the relevant support (legalfinancialsupport@riseup.net) with the details of your court date.

In Solidarity,
XR Legal Support Team

From:	Lucy Campaigner <campaigner@fossilfreelondon.org>
Sent:	16 October 2026 17:19
To:	Cole Cannings
Subject:	Away on holiday Re: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Hello -

I'm currently on leave. I'll be back on Monday 19th October so will get back to you as soon as I can then.

If your email is regarding a press enquiry, please ring our press number on 020 3886 2590 or email Robin on robin@fossilfreelondon.org.

Thanks, Lucy

--
Lucy
Climate Crisis and Inequality Campaigner, Fossil Free London
@fossilfreelondon Instagram <https://www.instagram.com/fossilfreelondon/>
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IN THE HIGH COURT OF JUSTICE
BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES
PROPERTY, TRUSTS AND PROBATE LIST (ChD)

Case No: PT-2022-000303

Courtroom No. 9

7 Rolls Buildings
Fetter Lane
London
EC4A 1NL

Friday, 6th October 2023

Before:

MR SIMON GLEESON (SITTING AS A DEPUTY HIGH COURT JUDGE)

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

-v-

PERSONS UNKNOWN

MS M STACEY KC & MR Y VANDERMAN (instructed by Landmark Chambers and Fieldfisher LLP) appeared on behalf of the CLAIMANTS
NO APPEARANCE by or on behalf of the DEFENDANTS

WHOLE HEARING

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Case called on.

MS STACEY: My Lord, I appear with Mr Vanderman for the claimants in this matter. There are two claimants: United Kingdom Oil Pipelines Limited and West London Pipeline and Storage Limited. There is nobody in appearance for the other side; as you will have seen the person is unknown. We have done a check, on this floor at least, we haven't gone beyond that, but we've had no engagement, no communications with them. Before I commence, My Lord, can I just check that you have all the relevant papers that we would hope you have. Namely, a court bundle, which has been provided, I believe, both electronically and in hardcopy. And that contains – I think the last version was sent to the Court electronically yesterday, slightly revised to add some documents to the back.

JUDGE GLEESON: I do not have any paper [inaudible]. I have another revised trial bundle.

MS STACEY: I'm grateful. The revisions-

JUDGE GLEESON: Yes.

MS STACEY: -if I can just clarify, simply relate to the additional two further certificates of service at the end of the bundle, together with a transcript of the judgment of Mr Justice Rajah in April of last year, which was approved on Wednesday of this week. Those have been added to the back, and I will take Your Lordship to those in due course. I hope you will also have a skeleton argument from us-

JUDGE GLEESON: Yes.

MS STACEY: -and a bundle of authorities.

JUDGE GLEESON: I do.

MS STACEY: I'm grateful. All of those documents have been served, and I will come onto that in a moment.

JUDGE GLEESON: I also have something headed "UK [Inaudible] 12". Oh, that is the exhibit bundle. Okay, fine.

MS STACEY: Yes. So, there's a hearing bundle, My Lord, which consists essentially of the claims, the application, this is in the order, the orders have been made, then you have the witness statements, certificates of service and the transcript. And then you have three exhibit bundles: EC1, EC2 and EC3.

JUDGE GLEESON: Yes.

MS STACEY: All of those documents have been served. So, My Lord, can I ask whether you have read anything or whether you require anything further from me before I kick off?

JUDGE GLEESON: No, I think I [inaudible] – well, [inaudible].

MS STACEY: You have read it. That is very helpful. So, you will have picked up, My Lord, by way of brief encapsulation of the issue, that this is an application for summary judgment dated 7 July, in respect of a claim for a final precautionary judgment against persons unknown. And the purpose of it, My Lord, is to restrain certain forms of trespass and nuisance by Extinction Rebellion and the Just Stop Oil groups at two sites which are owned by the respective claimants.

JUDGE GLEESON: Yes.

MS STACEY: This application, you may have picked up, is one in a series of claims by various oil companies, My Lord, for injunctive relief as a result of activities which commenced broadly in April 2022.

JUDGE GLEESON: Yes.

MS STACEY: And the last word, if you like, by way of factual backdrop was that most recently set out by Mr Justice Linden in the *ESSO v Persons Unknown* case in July.

JUDGE GLEESON: Yes.

MS STACEY: That's the last authority in the bundle. I place, understandably, some reliance on that because we are essentially, we say, in a materially identical position. Albeit that in that case, My Lord, it was a trial rather than a summary judgment. But for present purposes, we say that doesn't matter. So, My Lord, you will also have picked up, no doubt, that there have been three orders made, which I will come onto, for interim injunction. They are in materially identical terms. When we get to the order, we've made some small tweaks; they are not substantive but I will take you to those tweaks in a moment.

JUDGE GLEESON: [Inaudible] helpful. Thank you for that.

MS STACEY: Oh, good. You may also have a plan. You may have picked up there's been a, I don't want to jump the gun, but proposed amendment to the plan, or one of the plans, which serves to reduce rather than expand the area as a matter of correction. And from that you will have seen that we are dealing here with private land.

JUDGE GLEESON: Yes.

MS STACEY: The final injunction is plainly sought in accordance with our obligation to progress. Any recognition of the fact that an interim is by definition is intended to be temporary only.

JUDGE GLEESON: Yes.

MS STACEY: And summary judgment application has been brought on that basis, in broad terms, because we say it is just and convenient, My Lord, for the Court to grant the order both because there remains a continued risk, and I will take you to that because that will be really at the heart

of this application. And also because, we say, in light of the absence of a defence, and the evidence that we have placed before the Court, the CPR test Part 24 is satisfied, namely there's no prospect of successful defence and there's no compelling reason to take this to trial.

In relation to that, I alluded to the fact that there had been no engagement whatsoever throughout the course of these proceedings, and that includes following the first order which expressly provided at paragraph 16 for a defence to be filed within 56 days. So, My Lord, with your leave, I propose to take my submissions broadly in line and by reference to our skeleton argument, which serves somewhat as an agenda. I will deal firstly with the service, and I will do that because it is necessary, obviously, for us to satisfy you that the application and the documents in support have been brought to the defendant's attention. There has been effective service, compliance with Section 12.2 of the Human Rights Act, and compliance with the requirements under the CPR. So, that's service.

Then, I will take you, My Lord, to the background. It may be that I can skip through that, and I will take my guidance from you, because I don't want to waste the Court's time. Then, I will take you to continued threat, which we've foreshadowed in our skeleton. Then, briefly, to the principles, which we say are the key ones. And then finally, wrapping up, I will take you to the grounds.

JUDGE GLEESON: Yes.

MS STACEY: So far as service-

JUDGE GLEESON: I do not think we are going to need to spend too much time on the history or things like that.

MS STACEY: No, no.

JUDGE GLEESON: I have read [inaudible].

MS STACEY: Thank you, My Lord. When I get to background, I will take you, possibly, to the references, but I need not necessarily take you to the documents.

JUDGE GLEESON: Yes.

MS STACEY: I am just conscious that, given there's no one here, it's important for me to lay the ground, yes. So, service, if I can start with that. We start with that in our skeleton at paragraph eight. And the requirements, particular requirements, are in Mr Justice Rajah's order at paragraph nine; the reference, My Lord, is hearing bundle page 145, which I won't take you to unless you'd like me to. But essentially, he granted permission for alternative service on the basis that we post on the web link the various documents and email to a selection of email addresses.

JUDGE GLEESON: Yes.

MS STACEY: So, those are the requirements which this court needs to be satisfied have been complied with. The evidence of service is set out in Philips 1, the first witness statement of Mr Phillips, which is at 232 of the hearing bundle. And, My Lord, you have the certificates of service at the back of the hearing bundle at page 336 and 345.

JUDGE GLEESON: Yes.

MS STACEY: So, that's the source of the evidence. If I can just take it – in fact, I have a very helpful chronology of service which has been prepared by my learned junior, which I propose now to hand up to you, My Lord, because I think it might cut through things, at least in terms of the dates and references. I'm grateful.

JUDGE GLEESON: Yes.

MS STACEY: So, My Lord, you will see there that on 19 July, the summary judgment application notice was served. You have there the reference.

JUDGE GLEESON: Yes.

MS STACEY: And the notice of hearing was served, and you have the reference.

JUDGE GLEESON: Yes.

MS STACEY: And there's the evidence, in the form of the certificates of service which I've already referred you to. In relation to that, I should say, we've had a read receipt from Extinction Rebellion, confirming that the email was received.

JUDGE GLEESON: Right.

MS STACEY: And we have also got read receipts from Just Stop Oil. They are not in the bundle, I don't believe, but copies can be made available if you would like to see them. No correspondence has been received. You will then see, further down the chronology, on 28 September, that more recent documents were then served separately, consisting of the hearing bundle, Philips 1, that's the evidence of service, and Armstrong 5, which is the statement I will take Your Lordship to in due course, updating the threat point. And you have there the references.

JUDGE GLEESON: Yes.

MS STACEY: That was done both by uploading and by email, as required. And certificates of service are at the back of the hearing bundle in relation to those. In relation to that, I should say, we've received one bounce back in relation to the 28 September email from one of the Just Stop Oil email boxes, confirming that that box is essentially full. That's just one of the email addresses. And before then, we received no bounce backs whatsoever. So, My Lord, as set out in the

skeleton at paragraph 11, we say, therefore, that the steps we've taken to serve satisfy Section 12.2, which requires you to be satisfied that we've taken all practical steps to notify the respondents where they are neither present nor represented.

And then, in terms of, for the purposes of completeness, we then served, on 2 October, you'll see, the notice of the revised hearing, the skeleton argument and the bundle of authorities. On 4 October, we served the notice of hearing and the revised hearing bundle. And the last date, I think you can just discard because I think that just refers to the hearing.

So, all of the certificates are in the back of the bundle, My Lord. Yes, they are delivery receipts, rather. Not read receipts, that's… And they say, "Delivery to these receipts or groups is completed".

JUDGE GLEESON: Right.

MS STACEY: Moving, then, onto the background. The previous orders, My Lord, you will have seen in the course of your reading, but we have 12 April 2022, which is the first order for an interim injunction at page 94 of the hearing bundle. That's an order of Mr Justice Knox. And on the return date – please forgive me if I'm being too fast.

JUDGE GLEESON: No, no, no.

MS STACEY: On the return date on 21 April, that's page 125-

JUDGE GLEESON: Yes.

MS STACEY: -you have the second order of Mr Justice Knox, essentially continuing the injunction for a period of a year. And then on page 142, My Lord, of the bundle, a year later, in fact, I think bang on the longstop date, you have Mr Justice Rajah's order-

JUDGE GLEESON: Yes.

MS STACEY: -which extended the order for a further period of six months. And the purpose of that was to allow my clients the time to progress the matter to either a trial or default judgment, because, as an aside, we could've. And I think there was discussion before Mr Justice Rajah that that was the claimant's intention, to go for the default judgment, being a Part 7 claim. I understand the decision was taken not to do that, because that would've precluded the defendants from engaging in the process, essentially it being a tick-box exercise.

JUDGE GLEESON: Yes.

MS STACEY: So, we went for summary judgment instead. That was Mr Justice Rajah's order. And the test, My Lord, as we've highlighted in the skeleton, on all three occasions was whether or not my clients were likely to succeed at trial, rather than the lower threshold test[?]. And we say that's relevant for our purposes today. The sites, My Lord, are twofold. You have the site-

JUDGE GLEESON: Just to make sure I understand that, that is not the test I am applying today because that test only applies to interims, is that right?

MS STACEY: It is. It is. But we say it's relevant, because if all three judges were satisfied that we would be likely to succeed-

JUDGE GLEESON: No, no, I understand. I just wanted to make sure I am applying the right test.

MS STACEY: Absolutely. The test you are essentially applying, My Lord, is the section 37 test.

JUDGE GLEESON: Yes.

MS STACEY: "Is it just and convenient?" With the overlay in the *Avastin*[?] case, if I can – well, there are other cases. But the *Avastin* case, which is, "Is there a sufficiently real and imminent risk?"

JUDGE GLEESON: Yes.

MS STACEY: Because it's a precautionary injunction. "What's the gravity of the harm?" And you can look at those, we say, in the round, as Mr Justice Linden did in the ESSO case.

JUDGE GLEESON: Yes.

MS STACEY: My Lord, I think, do you have a fair handle on the sites or do I need to-

JUDGE GLEESON: Yes, no, I do have a fair handle on the sites.

MS STACEY: Oh. In terms of the access route, perhaps I can take this point now.

JUDGE GLEESON: Yes.

MS STACEY: Access route two, page 12 of the hearing bundle, you will see how it is depicted in blue. My Lord, what they essentially sought to do was to match the area over which the first claimant had rights under a lease, in relation to the area you see shaded red and marked "three" on that plan.

JUDGE GLEESON: Yes.

MS STACEY: But on further analysis, we saw that it went slightly beyond the area over which we have access rights. And on that basis, we propose to amend that plan to reduce that area so that it more accurately corresponds. And it may be convenient at this stage to hand up that plan so you can see the extent of the amendment. Apologies to your clerk for making you stand up constantly, but there's another document I'd like to hand up at this stage: it's a chronology of witness evidence which you may find helpful, My Lord, because it sets out the various witness statements and what they deal with.

JUDGE GLEESON: Yes.

MS STACEY: And you will see there, at the top, Mr Davis, number one, "covered sites and title", and the reference point. So, the sites are dealt with by him. Unless you need anything in relation to

sites, then I propose to take you very briefly to the direct action backdrop and the evidence of the past threat.

JUDGE GLEESON: Yes.

MS STACEY: So, the campaign commenced in 2022, but if you keep the chronology of witness evidence up, you will see Armstrong 1, page 167 of the bundle, referred to the nature of the use of the site and the risks in relation to both of the sites. I've got the paragraph references here, My Lord, do you need the – you've read the statements, you tell me.

JUDGE GLEESON: No, I have read them. I am familiar [inaudible].

MS STACEY: You are familiar?

JUDGE GLEESON: Yes.

MS STACEY: I'm grateful. And the incidents referred to in Mr Armstrong 1 included direct targeting of these sites themselves.

JUDGE GLEESON: Yes.

MS STACEY: And you've seen his evidence. And essentially, in relation to Site One, the examples that we've summarised in our skeleton at paragraph 14 include scaling tankers outside the site, cutting fences to gain access, locking on and resulting in arrests. And My Lord, in relation to the exhibit, if it would be helpful, there are some photographs and press articles which give you a flavour of what we're dealing with. EB2, which is the second exhibit bundle, page 65, I'm dealing here with Site One which is Buncefield, 65, 139-

JUDGE GLEESON: Yes.

MS STACEY: -to 143.

JUDGE GLEESON: Yes.

MS STACEY: 156 to 163.

JUDGE GLEESON: Yes.

MS STACEY: And 164 to 169, which refers to more than 40 activists having been arrested [inaudible]. And then finally, in relation to Site One, 170, which refers to a further 41 arrests. But this is a selection to the exhibits large. So far as Site Two is concerned, we've summarised the examples, My Lord, in paragraph 15 of our skeleton, in relation to which activities consisted of obstructions[?] and access to parts of the Kingsbury Terminal not owned by the claimants, so broader terminal, other oil companies owning parts, but which resulted in arrests. And the press articles which give you an indication, 109, this is Site Two, Kingsbury, you will see there a photograph of Just Stop Oil protesters sitting in front of a Kingsbury tanker.

JUDGE GLEESON: Yes.

MS STACEY: To 125, you just track down and there's just further detail, photographic evidence. And then 172, My Lord, referring to the arrests-

JUDGE GLEESON: Yes.

MS STACEY: -to 174. Going back a bit to 154, there's reference to "54 arrests amid on-going protests at Kingsbury Oil Terminal".

JUDGE GLEESON: Yes.

MS STACEY: That's 154 to 155.

JUDGE GLEESON: Yes.

MS STACEY: And then 192, there's a reference to the total arrested topping 275, again at Kingsbury, "the fifth day of chaos". And then finally, My Lord, 252 to 255-

JUDGE GLEESON: Yes.

MS STACEY: -chaining themselves to pipes at Kingsbury. So, in short, My Lord, this is an orchestrated, wide-ranging, coordinate and well-publicised campaign against the oil industry generally, and [inaudible] generate publicity to further their cause against the fossil fuel industry. And you may have picked up that it followed on from protests by Insulate Britain. Different activities, but it was a development of what came before it. In relation to these – these were the examples in relation to the specific sites, My Lord. But at the same time, I am sure you will have picked up that there were related incidents which we've referred to at paragraph 17 of our skeleton, targeting the various other fuel terminals nationwide. And that's referred to in Mr Armstrong's statement. I've got some reference to the press photographs if you would like me to give them to you. And at page 178 of the hearing bundle, Mr Armstrong in his statement makes reference to the statement of intention, 178 of the hearing bundle.

JUDGE GLEESON: Yes.

MS STACEY: (e) there at the top of the page, there's a reference to them saying "we're here to stay".

JUDGE GLEESON: Yes

.MS STACEY: So far as evidence of harm is concerned, Mr Armstrong deals with that also in his statement at paragraph 18 to 42. So, just further up the page, I will not take you to it because you tell me you've read it, unless you'd like me to.

JUDGE GLEESON: No, I have read it.

MS STACEY: And at page 61. But essentially, he refers to and explains the dangerous nature of this type of protest action at these particular sites.

JUDGE GLEESON: Yes.

MS STACEY: Moving the evidential picture on, then, My Lord, when it came before Mr Justice Knox, Armstrong updated his evidence. And Armstrong 2, as we're calling it, is in the hearing bundle at 193, which covers on-going statements of intention-

JUDGE GLEESON: Yes.

MS STACEY: -by these campaign groups. And Armstrong 3, at the second hearing before Mr Justice Knox, is at page 202 of the hearing bundle.

JUDGE GLEESON: Yes.

MS STACEY: And the last time it came before the Court before Mr Justice Rajah, that was the review hearing, My Lord. We deal with that in paragraph 18 of skeleton argument. As I say, the judgment was approved only days ago, but we've added it to the bundle.

JUDGE GLEESON: Yes.

MS STACEY: And if I could ask you to refer to paragraph 10, which is at page 446.

JUDGE GLEESON: Yes.

MS STACEY: Paragraph 10, Mr Justice Rajah refers to the direct action in 2022, and then in the second line he says, "There are continued statements", this is in April last year, My Lord-

JUDGE GLEESON: Yes.

MS STACEY: -"of commitment to direct action, at least by Just Stop Oil, and, before these injunctions, these terminals were target. The implication to me seems that, absent the protection of an injunction, direct action at these sites would escalate. Both Just Stop Oil and Extinction Rebellion continue to take direct action aimed at the energy sector. It is that continuing commitment of those organisations to direct action at these sites or similar sites, coupled by the fact that before the imposition, that direct action involved the commission of the torts and trespass, which suggest that, absent the injunction, there would be a real risk of further acts of[?] trespass and nuisance in these circumstances are likely to succeed at trial".

So, what he was essentially highlighting there is that notwithstanding the fact that post-injunction there has not been any specific incidents at these specific sites, there were continued statements of intention and on-going campaign, and that, coupled with past activities and the gravity of harm, My Lord, to which he refers at paragraph 11 in the form of potential release of substances, explosions and fire, which made it clear that there was an on-going threat which justified continued injunctive relief.

JUDGE GLEESON: Yes.

MS STACEY: And we say, My Lord, that, a year later, that remains the position today. So, Mr Justice Rajah continued the injunction for six months. He continued the evidence in

Mr Armstrong 4 at page 220 of the bundle. Before I take you, then, to why we specifically say there remains a continuing threat, can I just take you to the other injunctive[?] [inaudible] which form part of the evidential backdrop?

JUDGE GLEESON: Yes.

MS STACEY: We deal this, My Lord, in my skeleton at paragraph 20. I'm going to take them out of order, in chronological order rather than the order of the skeleton. So, *TFL v Persons Unknown* in May 2023, that's in the authorities' bundle, My Lord, at tab 12 page 370. That was a final injunction, five years granted, with provision for annual review in line with the supervisory role, and to allow the Court to consider the implications of a judgment coming out of the Supreme Court in relation to the Barking and Dagenham or Wolverhampton case. And, My Lord, if I can take you to that authority, that's page 380 of the authorities bundle. So, tab 12. Oh, you are probably dealing with it online[?]. So, 380, no tabs. *TFL v Persons Unknown* is the authority, May 2023-

JUDGE GLEESON: Yes.

MS STACEY: -370. Mr Justice Morris.

JUDGE GLEESON: Yes.

MS STACEY: Yes?

JUDGE GLEESON: Yes.

MS STACEY: Thank you. I'm grateful. And then if you turn, My Lord, to 380, paragraph 42-

JUDGE GLEESON: 380, yes.

MS STACEY: -you will see how – and I suppose I should put these into context. It was [inaudible] protest on the highway which we all are very well familiar with, I think.

JUDGE GLEESON: Yes.

MS STACEY**:** 42, Mr Justice Morris is there considering the question of threat. And in the first line, you'll see, "whether the fact the last protest solely under the [inaudible] banner took place in November, [inaudible] assessment of risk. I have concluded, nevertheless, there is such a real and imminent risk", and he relies on a number of factors, My Lord. "Firstly, Insulate Britain itself continues to state it will continue to protest, and it has stated so recently. Secondly, I accept the level of protest since November 2021 is likely to have been affected by a combination of the interim injunctions granted and cold weather. Moreover, if no injunction or final injunction were granted, then the chilling effect of the Court's injunctions would be removed, increasing the risk of resumption. Thirdly, if no final injunction were to be granted,

then it might well be that the recent switch from protests under this banner to another banner will be reversed". That's a specific point on the facts in that case.

JUDGE GLEESON: Yes.

MS STACEY: And then, My Lord, if you can track down to the paragraph starting, "Finally, in the case of the named defendants… will apply to them", that's actually irrelevant, sorry. And then the next paragraph, he refers to the ensuing harm being grave and irreparable.

JUDGE GLEESON: Yes.

MS STACEY: So, that's how it was dealt with in May of this year in relation to that particular case. And the next authority, My Lord, is *Transport for London v Lee*, which was the same month, at page 388 of the authorities bundle.

JUDGE GLEESON: Yes.

MS STACEY: A decision of Mr Justice [Inaudible].

JUDGE GLEESON: Yes.

MS STACEY: And this, again, was a final injunction, My Lord, with five years provision for annual review. And if I could ask you, My Lord, to look at page 396, at paragraph 29 through to 33, and I will just ask you to read that yourself.

JUDGE GLEESON: Yes.

Pause.

JUDGE GLEESON: Yes.

MS STACEY: And then the next authority, My Lord, North Warwickshire, it's Mr Justice Sweeting; judgment at page 407 of the bundle.

JUDGE GLEESON: Yes.

MS STACEY: This was an interim judgment, but for present purposes, the test of risk applies whether one is considering interim or final. And at page 438, paragraph 118, Mr Justice Sweeting makes the point that in cases where wrongs have already been committed, as opposed to merely threatened, the evidential threshold for establishing the conduct will continue unless [restraints may?], as a matter of common sense at least, be lower[?]. And then he talks about the purpose of the injunction being to prevent the repetition from which a reasonable risk can be apprehended, and given the prior actions.

JUDGE GLEESON: Yes.

MS STACEY: And then finally, My Lord, the most recent judgment, and the one which probably most mirrors, as I've said before, the factual evidence in this case is ESSO Petroleum at page 450 of the bundle. And that was, again, a final injunction, five years. And my learned junior,

Mr Bandon, appeared in that case and attended the hearing. If I could ask you to look at page 462, paragraph 61. In fact, we cite this in our skeleton-

JUDGE GLEESON: Yes.

MS STACEY: -as being the test. There is a reference to that [inaudible], Mr Justice Marcus Smith. "The two-stage test: is there a strong probability that a less [inaudible] will act in breach; and secondly, would the harm resulting be so great [inaudible] irreparable?" And at 63, My Lord, Mr Justice Linden says – well, he confesses some doubts as to whether actually there are strictly two stages to that, as opposed to it being a matter that one considers in the round as part of the Section 37 just and convenient test.

JUDGE GLEESON: Yes.

MS STACEY: Because at 64, you'll see he says, "The Court has to be persuaded that the risk and consequences of not making the order are sufficiently compelling to grant relief". And then we see over the page, "The Court must be cautious". But then he goes on to say that it would be surprising, for example, if the Court which considered there was a significant risk but not a strong probability would be precluded from granting an injunction no matter what the severity of harm.

JUDGE GLEESON: Yes, [inaudible].

MS STACEY: Yes. In the light of the evidence before him – and this is the critical part for my purposes because we rely on the same analysis, and we would urge you to adopt the same analysis. 65, he said, "In light of the evidence before me, I am satisfied, having regard to the risks of the event, that relief is refused[?], it is just and convenient". And 66, you'll see, he says he pressed Mr Morshead on the point, bearing in mind that only some of the incidents back in 2021 and 2022 are of trespass [inaudible] compliance.

"There's been an announcement of a change in tactic on the part of Extinction Rebellion". But then, at 67, My Lord, you'll see he considered the evidence in the round and was satisfied that the test was satisfied. And he places particular reliance on the fact that he says it would've been easy for the campaign groups to actually have disavowed any further intention to campaign in relation to these sites or resume activities. In our skeleton argument, My Lord, you will have seen we refer to a tweet from Just Stop Oil-

JUDGE GLEESON: Yes.

MS STACEY: -dated June 2023, which refers to the injunction having deterrent effect. One would have thought that that might be the platform which they could have used to provide the very assurance that Mr Justice Linden was referring to. But they did not. In fact, the tweet, we say,

is evidence that the injunction is needed to provide that continuing deterrent effect. So, moving on to continued risk, and I have covered some of this ground already, you have our skeleton argument at paragraph 23. And perhaps it might be most convenient for us to [take that up?].

JUDGE GLEESON: Yes.

MS STACEY: We rely on the matters summarised there, so, the direct action that occurred in April 2022, so, past activity. Secondly, further incidents of trespass in close proximity since the orders were made. Thirdly, on-going action, direct action carried out by the organisations which are aimed at the same target. Fourthly, continued statements on the part of Just Stop Oil that they will continue their campaign of direct action and are actively recruiting new members. And, My Lord, in relation to that, again, apologies to your clerk, there's a schedule of such statements from February 2021 to August of this year, which Your Lordship might find helpful by way of précis. Can I just hand this up to His Lordship, please? Yes, it's okay.

JUDGE GLEESON: Yes.

MS STACEY: And if you take that and also look back to our skeleton, My Lord, in (d) we refer to continued statements, and we give two examples in the bullet points-

JUDGE GLEESON: Yes.

MS STACEY: -just before paragraph 24r. You will see that those statements are two amongst a number.

JUDGE GLEESON: Yes.

MS STACEY: And at 24, we deal head-on with the fact that there has been no direct action in relation to the sites since April 2022. But we say it's likely for the reasons given in the evidence, and I have referred Your Lordship to the tweet.

JUDGE GLEESON: Yes.

MS STACEY: So, moving, then, on, unless I need to help you any further on continued threat, to general principles. I think, My Lord, I can skip over this relatively quickly. Sticking with the skeleton argument, at paragraph 25, the jurisdiction of that [inaudible] section 37. There's no jurisdictional impediment, My Lord, at this stage at least, in relation to final injunctions being granted against persons unknown. A judgment is awaited, but we will need to proceed on the basis of the present law.

JUDGE GLEESON: Yes, yes.

MS STACEY: So far as summary judgment is concerned, the principles are well-known and will be familiar to Your Lordship. And we've summarised them at paragraph 27a through to e, and place specific or particular reliance on principles d) and e), and to the [*King v Steeple*?] case,

which the Court of Appeal in the *National Highways* case endorsed. Where there are no defences – and in this case, I fully recognise that persons unknown wouldn't normally file a defence. But they would engage, one would have thought, with the proceedings if they had an interest or a reasonable prospect of raising a legitimate challenge.

JUDGE GLEESON: Yes. But I do not think it is impossible to say if such a person was in court what would they say? That [inaudible]. I struggle slightly to think of what they might say that would constitute a defence on the basis of the particular issues here.

MS STACEY: My Lord, yes. And particularly in circumstances where this particular injunction is narrowly circumscribed.

JUDGE GLEESON: That is a critical point here. I find it extremely hard to see how it could be argued that there was some sort of right to trespass [inaudible] land, [inaudible] argue here.

MS STACEY: Indeed. And the fact that we've had three judges considering the same ground[?]. We're not seeking any different terms. There's been no engagement. All of that can be thrown in the pot, if you like.

JUDGE GLEESON: Yes.

MS STACEY: And it points to the Court drawing an inference that there is no such defence. And it's not for the Court to in fact to speculate what the defence could be. That would be "impermissible Micawberism", as the Court of Appeal put it in the *National Highway* case.

JUDGE GLEESON: Yes.

MS STACEY: The fact of the matter, My Lord, is that you are here today with nothing from the defendants and everything from us pointing in the direction. And in the circumstances, the burden that has been shifted onto the defendants has not been discharged.

JUDGE GLEESON: Yes.

MS STACEY: Because that's the point at 29, you'll see, My Lord, which sets out the proposition that where the burden of proof – the burden of proof is on the applicant. But if we adduce credible evidence in support, the respondent then comes under an evidential burden to them prove some real prospect, and that's simply not been done.

JUDGE GLEESON: No.

MS STACEY: And paragraph 30, the test is exactly the same whether one is dealing with final or interim. So, My Lord, if I can pull the threads together, the grounds of the application are fourfold. Firstly, paragraph 31 of the skeleton, we have a specific cause of action. Unless you need me to, I will not trouble you with that. Secondly, the criteria in *Canada Goose*-

JUDGE GLEESON: Yes.

MS STACEY: -are made out, but I will come to that in a moment. Thirdly, we say there's been no interference, or there can be shown to be interference with Articles 10 and 11 in this particular case. And finally, the service requirements have been satisfied. And for all of those reasons put together, we're entitled to [our on-going relief?]. So, I think the key point in relation to that simply is really likely to be simply *Canada Goose*, I'll take us to that, from paragraph 35 of our skeleton. The first criteria – and, My Lord, I haven't taken you to the authority, and I can do so if you'd like me to, but-

[Crosstalk]

MS STACEY: It's also set out in paragraph 82, and these are the criteria that one needs to satisfy when dealing with relief against persons unknown.

JUDGE GLEESON: Yes.

MS STACEY: "They must be people who've not been identified but are capable of being identified [inaudible]". That really boils down, My Lord, to the description. "If necessary by alternative service…"

JUDGE GLEESON: Yes.

MS STACEY: But our position, My Lord, on that, in a nutshell, is we have defined them sufficiently well. Judges previously have all endorsed the alternative service provisions and it is possible to give effective notice. The second criteria is that they must be defined by reference to the alleged unlawful conduct. My Lord, you will see how they are defined here. There are two categories of persons unknown: the first is in relation to the private land, and the second is in relation to the accesses. And you've got reference to the campaign groups. And the activities are by reference to the conduct alleged to be unlawful.

Thirdly, this is the real imminent risk point, which I've covered to some extent and dealt with it relatively comprehensively in our skeleton at paragraphs 41 onwards. 43 really reinforces what we say at paragraph 23 and sets out our argument. The evidence, when one takes it as a whole, points to there continuing to be a risk of further tortious conduct. We repeat what we said before. We make the point that the downturn has been due to the deterrent effect in all likelihood, and emphasise the fact that Mr Justice Linden thought so too.

JUDGE GLEESON: Yes.

MS STACEY: Thirdly, we make the point about failing to give assurances when it would've been relatively easy for them to have done so. And we refer to our untested evidence as to their intentions and the burden points that I referred Your Lordship to a moment ago. At (d) we refer to the harm which would be very severe if the injunction were pulled. And then finally, it's

really a repetition of the same point there, but it is opportunity to raise challenges. But that's really in the context of this being a summary judgment application. And then finally, My Lord, we rely on the fact that all three judges applied the "likely to succeed" test. And Mr Justice Linden considered that it was appropriate to grant final relief in very similar circumstances. So, that's threat, the third *Canada Goose* criteria. The fourth, I think I have covered in relation to the first. "Individually named if known and identified". Well, we don't know who any of them are.

JUDGE GLEESON: Yes.

MS STACEY: And they are "capable of being identified". Five, "the act must correspond to the threat in the tort".

JUDGE GLEESON: Yes.

MS STACEY: They do, and they're not so wide as to prohibit lawful conduct.

JUDGE GLEESON: No.

MS STACEY: Six, "the terms must be clear and precise". Well, they are, we say, quite clearly.

JUDGE GLEESON: Yes.

MS STACEY: And "the interim junction finally should have clear geographical and temporal limits". So far as temporal limits are concerned, My Lord, we propose five years, and that corresponds with the preceding cases which I've taken Your Lordship too. You've got the scheduled[?] statements of intention, which we prepared specifically for the purpose of identifying what the temporal hook might be. And it's quite clear that it's not a short-term exercise. We obviously have a duty to come back to court if anything changes, arising out of the Wolverhampton Supreme Court appeal. But we have factored in an annual review in line with our on-going obligations.

And then geographical limits, My Lord, I've taken you to the plan as revised, which is the only amendment in terms of geography that we're suggesting. So, all in all, the *Canada Goose* criteria are made out. You see what we say about human rights and service. And unless there's anything else I can specifically address you on, those are our submissions.

JUDGE GLEESON: One thing that occurred to me, and that is [inaudible] the question as to costs. Would [inaudible] in the order you asked for, I think is costs reserved.

MS STACEY: Well, we don't tend, in these kinds of cases, to ask for costs.

JUDGE GLEESON: No, that was where I am going.

MS STACEY: Yes.

JUDGE GLEESON: And-

MS STACEY: And that reflects the practical reality, My Lord, that there are unlikely to be – in my experience, I've done a lot of National Highway cases, where you have named persons, hundreds of named persons in the schedule, and in those cases we have asked for costs, albeit it's extremely difficult to enforce. But in a case like this, where there are persons unknown who are not joined to the proceedings, it is conceptually quite difficult to see how that would work.

JUDGE GLEESON: Let me tell you why I think this is potentially an issue. Costs reserved ensures [inaudible] in due course, it should do, if there ever is a case. It just seems to me, if I were one of these persons unknown and I was to look at this and say, "Actually, I do want to pop my head above the parapet and challenge this decision", then I would be at least incurring the potential risk that if I did that and failed, I would then be hit with an order for costs incurred [inaudible] potentially be. It just seems to me that that is a potential disincentive effect, or whatever you want to call it, for anyone to actually turn up and say, "I wish to disclose my identity".

Well, this is not going anywhere in particular. I just – it concerns me slightly that what we are leaving here is a sword of damocles that hangs over the head of any potential challenger.

MS STACEY: My Lord, I see it leaves a thread hanging. But I can take instructions as to what the objective is. I suspect that if there were such a scenario, as suggested by Your Lordship, if somebody did haul everyone back in, in circumstances where there has been ample opportunity since the first order was made for genuine challenges to be raised, if such a person did turn up, in my submission, it is very unlikely that it would unravel the order. But what it would do is incur even further costs. Then it would be a matter for the Court's discretion as to what the [incidents of those?] costs should be, and the Court has ample jurisdiction to, in the exercise of its discretion, decide what's fair or not fair.

But, in my submission, my clients are entitled to be protected against such a scenario. The fact there might be a risk concentrates the minds of persons unknown not to take points which they don't – and they do have an opportunity to take advice; there are law firms that act for them.

JUDGE GLEESON: Yes.

MS STACEY: And I have been involved in proceedings where they've had silks acting for them and so on. So, it's a principled request. We are, in my submission, entitled to ask for it, to guard against that very concern.

JUDGE GLEESON: No, no, I entirely understand that. I am just musing as to whether no order, as far as this particular order is concerned, might be a better outcome, since [inaudible].

MS STACEY: Yes, well, can I turn my back for a moment and see what…?

Pause.

MS STACEY: My Lord, our concern is the [inaudible] it's the incurring of additional time and expenditure if such a person did come and then we'd have to come back to court. So, it's the additional time, as opposed to the time incurred so far. It may be possible to come up with a form of words that covers that off. But my primary submission on that is that the Court does have a discretion; the Court can look at all the circumstances.

JUDGE GLEESON: Yes.

MS STACEY: And I suggest it would be unlikely for a court to order the whole of the costs in circumstances where that particular person hadn't engaged up until that point.

JUDGE GLEESON: [Inaudible] I understand that. And, I mean, I suspect, to be perfectly honest, that your fundamental point that this just remains in the discretion of the Court, and the Court is not going to exercise its discretion capriciously is probably enough to dispense with the point. [Inaudible] as to whether that is sufficiently clear to a potential objection [inaudible] concern with it. Okay-

MS STACEY: Sorry, My Lord, last point.

JUDGE GLEESON: Yes.

MS STACEY: It's not inconceivable that such a person might try and reopen because they haven't turned up the entirety of the application.

JUDGE GLEESON: Yes.

MS STACEY: In which case, it's a matter for the Court.

JUDGE GLEESON: [Inaudible].

MS STACEY: Indeed, so one should exclude-

[Crosstalk]

JUDGE GLEESON: Yes.

MS STACEY: Yes.

JUDGE GLEESON: [Inaudible]. Okay, all right, I would like to collect my thoughts. Let us resume at 12 o'clock and [inaudible].

MS STACEY: Okay.

Court rises.

Court resumes.

JUDGE GLEESON: I am going to make the order in the terms requested.

Judgment transcribed separately.

MS STACEY: My Lord, I am grateful. I don't think there's anything else I need to – sorry, I will just turn my back. Oh, yes, in the draft order-

JUDGE GLEESON: Yes.

MS STACEY: -that we placed before you, the revised draft order, rather, can I just ask you to pull that up?

JUDGE GLEESON: It is tab eight, is it?

MS STACEY: It is tab eight but I don't think that's the correct version. Does someone have a hardcopy? I will hand it up in hardcopy. There's a [inaudible] version, sorry, and a cleaner version, and we can send it electronically after this hearing. But for present purposes, I am handing it up just to make sure that we are aligned. There's nothing on the first page, My Lord.

JUDGE GLEESON: Right.

MS STACEY: Second page, the penal notice stays. The only amendment on the second page is who you have heard from, that's me.

JUDGE GLEESON: Yes.

MS STACEY: And an update to the evidence recorded is in schedule one. But then you will see, My Lord, in the last recital, we say, "Upon the claimants being permitted to apply for summary judgment pursuant to CPR…" we flagged it in our skeleton, I have the authority with me. I didn't address you on it. It's self-evident, we say, that we should be – it's implicit in our application. But the rules require us to have permission, and for that reason we have inserted the recital in the order. I apologise, it's something I missed when I was making my submissions.

JUDGE GLEESON: [Inaudible], thank you.

MS STACEY: But it's in there. And if you require to hear me, I understand it's slightly unorthodox, but I can address you.

JUDGE GLEESON: No.

MS STACEY: No? Other than that, [inaudible] relevant plan, this is the order that we're seeking.

JUDGE GLEESON: Yes, and [inaudible].

MS STACEY: I am most grateful.

JUDGE GLEESON: Thank you.

End of hearing.

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IN THE HIGH COURT OF JUSTICE
BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES
PROPERTY, TRUSTS AND PROBATE LIST (ChD)

Case No. PT-2022-000303

Courtroom No. 9

7 Rolls Buildings
Fetter Lane
London
EC4A 1NL

Friday, 6th October 2023

Before:

MR SIMON GLEESON (SITTING AS A DEPUTY HIGH COURT JUDGE)

B E T W E E N:

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

-v-

PERSONS UNKNOWN

MS M STACEY and MR Y VANDERMAN (instructed by Landmark Chambers and Fieldfisher) appeared on behalf of the Claimants
NO APPEARANCE by or on behalf of the Defendants

JUDGMENT
(Approved)

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JUDGE GLEESON:

1. This is an application for summary judgment to restrain protesters against the oil industry at two particular sites, Buncefield and Kingsbury. It is, I think, very important that the order that has been sought has been carefully crafted in order not to interfere with the rights protected by the Human Rights Act 1998 to freedom of expression, and I note that one of the affidavits provided by the applicant to this order explicitly states that these parties do not wish to restrain that right. What they wish to restrain is trespass and nuisance, and those are the only things which the order seeks to restrain.
2. Now, the background to this is that an order restraining these activities was made on an interim basis by Peter Knox KC. That order was returned on 21 April. A year later, it was reviewed by HHJ Rajah. During that period, the whole issue of service was gone into in some detail. Orders for methods of alternative service were set out in those judgments. Ms Stacey has taken me to the evidence relating to service. I am entirely satisfied that as regards these proceedings service was effected in accordance with the directions given in those hearings. The parties have therefore been validly served, and have not appeared to oppose or contest this application. I am therefore asked to give summary judgment.
3. It is clear that it is possible to give an order of this kind in respect of an action in respect of persons unknown; there are plenty of authorities to that effect and I was taken to a number of them. It is also the case that the determination to be made must follow exactly the same mechanism as for any other summary judgment. This is the well-known approach set out by Lewison J in Easyair Ltd v Opal Telecom Ltd [2009] EWHC 339 (Ch), as approved by the Court of Appeal in AC Ward & Son v Catlin (Five) Ltd [2009] EWCA Civ 1098) . .
4. The key question, which to some extent underpins the others, is as to realistic prospect of success. Now, I was taken to a great deal of evidence about the activities that have taken place by way of trespass and nuisance on this site. I think it is more or less impossible to imagine that it would be possible to argue at trial either that those activities have not happened or that they did not constitute trespass or nuisance. I do not think there is any possible line of investigation that would produce any different outcome. I am therefore satisfied that, if the activities which the Claimants fear were to take place, the result would be actionable harm to them.
5. That, however, takes me to the question of how likely it is that these activities would in fact take place if the injunction were not granted. As the Court of Appeal said in Boyd and Another v. Ineos Upstream Limited and Others [2023] EWHC 1485 (KB), an injunction of this kind will only be granted if there is a sufficiently real and imminent risk that the defendant will commit an actionable wrong against the claimant.
6. Now, the key point here, I think, is that it is accepted that there has been no recent protest. It seems fairly clear that the reason for that has been the existence of the injunctions. In this context, there was a great deal of evidence put forward in the various witness statements to the effect that the organisations under whose umbrella these protests take place, that is, Just Stop Oil and Extinction Rebellion, have absolutely not lessened or scaled back either their protests or their campaign; there are tweets and public statements from them to exactly that effect; and the fact that they are currently engaged in similar acts of civil disobedience is common knowledge. IN addition, there are public statements from the protest organisations which effectively say, in respect of the particular facilities which are the subject of this injunction, that "The reason we have stopped doing this is because of the injunctions". Now, it seems to me that when you put those facts together, if these injunctions were not continued

for any reason it is very hard to imagine that the protests concerned would not continue to take place. I therefore think the strong probability test is satisfied on this occasion.

7. I also note the point that was urged upon me that this was exactly the same conclusion that HHJ Warwick came to when he looked at this point six months ago, that the mere fact that the existing injunction had caused the activity to cease did not mean that there was no strong probability that the activity would not immediately resume if the injunction was lifted. Consequently, I am satisfied that there is a real risk, there is a strong probability that trespass and nuisance will continue, if not restrained by this injunction.
8. I am aware that the burden is on the applicant to satisfy me to that extent. I think they have discharged that burden. As I say, I think the only imaginable defence, if this were to go to trial, would be something based somehow on Articles 10 and 11 of the Convention on Human Rights. However, as I say, the injunction which is sought on this occasion has been very specifically crafted in order to avoid engaging those articles.
9. Therefore, it seems, in that regard, that the criteria for grant of summary judgment are satisfied. The only other thing which I think is required to be dealt with is that because this is an application regarding persons unknown, I need to give consideration to the issues set out in *Canada Goose v Persons Unknown* [2019] EWHC 2459, which set out some very specific issues that require to be considered in respect of really any proceeding relating to persons unknown. The first of these is are these persons capable of being identified, and are they capable of being served by alternative methods. The conclusion of Peter Knox KC and HHJ Rajah were that they clearly are, and directions for alternative service was given. It seems to me that this decision was entirely correct. The second is that the activity which is to be restrained must be clearly defined in the originating process. That, I think, is clearly the case here because of the clear way in which the activities to be restrained are set out. The question of sufficient risk I think we have already dealt with. The third is that the precise scope of the injunction, and in particular the conduct which is to be restrained, is precisely set out.. Well, that is not terribly hard. What is restrained is specifically trespass and nuisance. There is no issue here of restraints of any sort of legal activity or permitted activity, so I think the question of whether the activity is capable of being identified is that, yes, it can. The fourth is that the terms of the order must be sufficient and precise. I think the terms of the draft order that I have been asked to make satisfy that requirement. In addition, there must be clear geographical and temporal limits. The geographical limits are clear; they are set out in maps which accompany the draft order. Finally, the order must have defined limited scope in time. What is asked for here is an order to last for five years with provisions for annual review. That seems to me to be entirely sensible and appropriate. I also note that it is consistent with the orders that have been made in other very similar cases.
10. I therefore think that all of that criteria which are required for the grant of an order of this kind are satisfied.
11. A simple summary of all of that is that I think that those judges who have considered this issue before me analysed it correctly, , and I am really doing nothing more than following their footsteps.

End of Judgment.

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This transcript has been approved by the judge.

IN THE HIGH COURT OF JUSTICE
CHANCERY DIVISION

Case No. PT-2022-000303

Courtroom No. 4

The Rolls Building
7 Rolls Buildings
Fetter Lane
London
EC4A 1NL

Wednesday, 20th November 2024

Before:
THE HONOURABLE MR JUSTICE MILES

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

- v –

PERSONS UNKNOWN

MS M STACEY & MR Y VANDERMAN appeared on behalf of the CLAIMANTS
NO APPEARANCE by or on behalf of THE DEFENDANTS

WHOLE HEARING

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Case called.

JUDGE MILES: Yes.

MS STACEY: My Lord, admit please Your Honour, I'm here on behalf of the claimants in this matter, with Mr Vanderman, my [inaudible], behind me.

This is the review hearing in respect of, rather, the final injunction that was granted last October by Mr Justice Gleeson.

As Your Lordship will no doubt know, this is an injunction against persons unknown which have a somewhat special status in the sense that they are quasi-final, by which I mean that's, essentially, why we're here. There's a review to be had on an annual basis according to the terms of the Gleeson order, and that's paragraph 12.

The purpose of this hearing is to review the position, and I'll take Your Lordship through the test in a moment. Before I do that, may I turn to some housekeeping matters?

JUDGE MILES: Yes.

MS STACEY: I hope that you've received a hearing bundle plus four exhibit bundles.

JUDGE MILES: Yes.

MS STACEY: I am going to refer Your Lordship, subject to anything you would like me to refer you to, specifically, really, only to the hearing bundle and the exhibit bundle four, on the basis that those are the main references in terms of updating. The rest are really focused on the historic position. You also have, I hope, our skeleton.

JUDGE MILES: Yes.

MS STACEY: Just recently I had the clerk hand up to you a copy of another judgment. That's the judgment of Mr Justice Cotter in the *Shell* case. The reason I handed that up to you was just a complete suite of judgments in relation to what I'll characterise as the new offences circumstance, and I'll take Your Lordship to that, why I say that material in a moment, rather consistent with how we put it in our skeleton.

JUDGE MILES: Yes.

MS STACEY: Subject to anything that you have to ask me about at the outset, I propose to structure my submissions, essentially, in the same order as the skeleton. They are in six parts.

First I'm going to take Your Lordship's service, although noting that that term has moved on somewhat pursuant to the Supreme Court in Wolverhampton. It's really notification that we're concerned with here. I'll use the term service for convenience. That's part one.

Two, then I'm going to take Your Lordship to the test on review and take you to four authorities very briefly. Thirdly, the relevant background. Fourthly, relevant evidence as to

why we say the matters have not changed. This position is essentially the same as it was before Mr Justice Gleeson.

Fifthly, I then will make my submissions on why this injunction should be continued on review. And sixthly, I will deal with the ancillary application to dispense with and vary one component of the alternative service provisions. Those are the six parts.

JUDGE MILES: Yes.

MS STACEY: Turning then to service. As far as service and section 12, insofar as it applies, My Lord, section 12 is in the authorities' bundle. That requires you to be satisfied that there's been proper notification where the defendant's not present if their rights of publication are potentially infringed. We'll assume for present purposes that section 12 is engaged.

We deal with this, My Lord, in our skeleton at section six. That's paragraph six onwards. If I can invite you to look at the relevant witness statement of Phillips, number two, which is at page 218 of the hearing bundle. It's Phillips two, paragraph six.

JUDGE MILES: Wait a moment.

MS STACEY: I'm dealing with things electronically, so I will give you a little bit more time.

JUDGE MILES: Just give me a moment.

MS STACEY: It's the main hearing bundle. I'm just trying to see which one- It's not quite properly labelled, it's-

MS STACEY: Does it help Your Lordship if I gave you the tab?

JUDGE MILES: I seem only to have, at the moment, a series of bundles called Exhibit Bundle.

MS STACEY: Do you have one which is entitled Indexed Bundle for Use at the Hearing of the Review? Which I'm calling the Hearing Bundle.

JUDGE MILES: It may be that one. Yes, I have got it.

MS STACEY: You have it? Perfect, thank you. It's tab 26, page 218.

JUDGE MILES: Yes.

MS STACEY: Paragraph six on page 218.

JUDGE MILES: Yes.

MS STACEY: You see there, there is evidence as to compliance with paragraph 6A of the Gleeson order. It's set out that there was an uploading of the Gleeson order. This is the order itself of the defendant's post the hearing before Mr Justice Gleeson on 13 October 2023, so shortly after the hearing. Then paragraph eight, compliance with paragraph 6B-

JUDGE MILES: Yes.

MS STACEY: -in relation to site one and two. Those are the warning notices, My Lord. Prominent locations. See what's said there at eight and nine.

JUDGE MILES: Yes.

MS STACEY: Then over the page you have compliance with paragraph 6C, the order is affixed-

JUDGE MILES: Yes.

MS STACEY: -at both sites. Then finally 6D, where you have the email addresses being sent to. That's all email addresses with the relevant confirmations.

JUDGE MILES: Yes.

MS STACEY: Then at paragraph 14, you have the automatically generated response that was received in relation to that.

JUDGE MILES: Yes.

MS STACEY: In relation to that service, we've got the certificate of service, My Lord, which I can take, Your Lordship. It's back tab 29, hopefully in the same bundle, at page 243.

JUDGE MILES: Yes.

MS STACEY: That's the certificate relating to those methods of service, as you'll see.

JUDGE MILES: Yes.

MS STACEY: That's Phillips two, dealing with the Gleeson order. Phillips three deals with the notice of hearing of the review hearing. If I can ask Your Lordship to turn to tab 28 and take it from page 239. All this has to do with service of future documents, the documents after the order. Those documents are referred to in paragraph six on that page.

The following documents: the application notice, the draft order. The sixth witness statement, that's the updating statement, which I'll take, Your Lordship, to in its exhibit.

JUDGE MILES: Yes.

MS STACEY: Then compliance, then, with the method of service. Here, there's no requirement to serve in plastic containers. You've got paragraph eight, which is the upload. Then paragraph 12, over the page, you have service by way of e-mail on 24 October 2024. The read receipt's at paragraph 14. Then a further e-mail is sent, paragraph 15 to Just Stop Oil. I just ask you to read down that page to see what was done. That's paragraph 15, My Lord. In relation to the application, that's the application to amend the alternative service provisions.

JUDGE MILES: Yes.

MS STACEY: Then the read receipt's, in relation to that, paragraph 17. Then there's a further e-mail sent in relation to the application notice and the hearing of the application of this hearing,

referred to in paragraph 18, and the read receipt. My Lord, the certificates of service, in relation to those, are at Tabs 30 and 31. Thirty, that's page 389, being the notice of hearing.

JUDGE MILES: Yes.

MS STACEY: Thirty-one being the application notice, the draft order for the application notice and [inaudible] six. Those are dated 11 October 2024. You see that at page 44.

JUDGE MILES: Yes.

MS STACEY: Just to complete and bring it most up to date, My Lord, most recently, not in the bundle, but documents I'm about to hand out at Your Lordship. Firstly, the bundles for this hearing and Phillips three, which I've just taken you to in relation to its service, were served. I've got certificates of service in relation to those. I'm going to hand you up in the complete pack, so I'm not doing it piecemeal.

We've set that, firstly, so the bundles in Phillips three were served on 11 November 2024. I shall hand out certificates of service confirming that. Secondly, the skeleton arguments and the authorities bundle were served on 14 November 2024. There are emails and appendix two of the certificate of service for that, informing the defendants that the hearing was listed for today. Albeit, at that stage, we didn't have any notice of the court number.

Then, thirdly, yesterday, we emailed the defendants to inform them of the courtroom. I've got copies of those emails to hand up to you as well. The oldest document is at the bottom. The most recent document is at the top. If Your Lordship's looking at the emails, at the back of that, you see the read receipt. I think at the last page, you'll see the delivery notification.

JUDGE MILES: Yes.

MS STACEY: Those were sent to both JSO and Extinction Rebellion. Behind that, you have the certificate of service in relation to the skeleton and the authorities bundle. 14 November.

JUDGE MILES: Yes.

MS STACEY: Then behind that, My Lord, you have the certificate of service in relation to the bundles and the third witness statement, Mr Phillips, of 11 November.

JUDGE MILES: Yes.

MS STACEY: As a result of all of those documents having been shown to you, we submit that any service requirements have been complied with and that insofar as they apply, sections 12.2 of the Human Rights Act requirements are also satisfied thereby.

JUDGE MILES: Yes.

MS STACEY: Taking you then to stage two, tests at the review hearing. We deal with that, My Lord, in our skeleton, from paragraph nine. I'll take you to the four authorities that we refer to in

the skeleton. I assume you've read everything, and if I'm being unhelpful, then no doubt Your Lordship will tell me that it may be helpful to look behind these to ensure that you take them to their own passages.

The first, then, this test, you see is what sets the parameters for this hearing and the exercise that Your Lordship is required to undertake.

The first authority is *HS2*, which is in the authorities bundle at tab nine. Page 204, paragraph 32.

JUDGE MILES: You have cited the relevant bit in the skeleton.

MS STACEY: We have, in the skeleton, exactly. That's the paragraph that we cited. The skeleton, paragraphs 32 and 33. The key point is that the passage that we've underlined in the skeleton is necessary to determine on the evidence whether anything material has changed about eight lines down from the start of paragraph 32.

If nothing material has changed, if the risk still exists as before, and the claimant remains rightly and justifiably fearful of unlawful attack, the extension may be blocked, so long as the procedure and legal repair have been observed and fulfilled. On the other hand, if material matters have changed, the author is required to analyse it.

JUDGE MILES: That was an interim injunction case, was it not?

MS STACEY: It was.

JUDGE MILES: But you say that the same principle applies.

MS STACEY: For present purposes, that makes no difference. In this space there's very little difference on reviews. This is the test that, we submit, is the test to be applied.

JUDGE MILES: Yes.

MS STACEY: The second authority is *Thurrock*, which is at tab 13 of the authority bundle. Page 312, paragraph 30. Mr Justice Knowles. By reference to *HS2* and he just refers to the same two paragraphs. That's, if you like, Mr Justice Ritchie's test, as endorsed by Mr Justice Knowles.

JUDGE MILES: Sorry, paragraph?

MS STACEY: Sorry, page 312, paragraph 30.

JUDGE MILES: Right.

MS STACEY: It's, essentially, My Lord, an endorsement of the approach adopted by Mr Justice Ritchie.

JUDGE MILES: Now, was this an interim or a final?

MS STACEY: This was a final. Oh, no, forgive me. It's an interim. It's a continuation of an interim injunction. There's to be a hearing in October. Page 303, My Lord. "There is to be a hearing in October 2024 and the order will remain in effect until then". So it's an interim.

JUDGE MILES: Right.

MS STACEY: Yes. Then next is *Arla Foods*, tab 10. Decision in July 2024. It was a final injunction. You see that in paragraph four on page 221. At the end of paragraph four, four lines from the bottom, "The case is brought on for a final hearing before me to deal with the disposal of the claim and a continuation of the injunction order. This is my judgment following that hearing".

JUDGE MILES: This was actually the final injunction itself, not a review of the final injunction?

MS STACEY: Yes. At page 248, paragraph 128. If I can ask you to take about eight lines from the top, starting with the annual review.

JUDGE MILES: Yes.

MS STACEY: So it explains the context for the annual review even though that hearing, as you say, was the final injunction. It will allow a continued assessment of whether circumstances have changed.

JUDGE MILES: Yes.

MS STACEY: Finally, My Lord, tab seven, if you would, page 118. This is the *Exolum Pipeline* case. Mr Justice Farley-

JUDGE MILES: I think it is Mrs Justice Farley.

MS STACEY: Oh, Mrs Justice Farley. I'm grateful.

JUDGE MILES: You are.

MS STACEY: At paragraph 28 on page 118, which makes the point that the review is not a rubber stamp. The Court, obviously, needs to consider the evidence to ensure that the continuation of the injunction is proportionate and that its duration is no longer than necessary. We emphasise that point at paragraph 11 of our skeleton. This was a final injunction.

JUDGE MILES: Was that? I am just looking.

MS STACEY: Well, I'm just actually-

JUDGE MILES: It looks as though it might not have been.

MS STACEY: It looks as though it was a long interim, actually.

JUDGE MILES: It was an interim.

MS STACEY: Yes, it was an interim. Quite why it hasn't come to a final hearing. It isn't explained.

JUDGE MILES: Yes.

MS STACEY: Those are the four authorities. Obviously, since the last hearing, there's also been the Supreme Court decision in *Wolverhampton*, which I will take Your Lordship to in a moment, and that has not changed, ultimately, the position. It has not changed the position in our submission.

It has involved a reformulation of some of the requirements, which we refer to as the 15 Valero requirements. We've adopted those and gone through those in our skeleton, but I'll take Your Lordship to those in a moment. Those are the tests.

Thirdly, then, if I can take Your Lordship to relevant background. The application relates to two sites. We start this in paragraph 13 of our skeleton. Site one is West Buncefield Oil Terminal on the edges of Hemel Hempstead. It's described, My Lord, in the Gleeson Order at schedule two. If I could just ask you to turn up the Gleeson Order at page 127. Schedule two. It's the hearing bundle. That's Buncefield. It involves and comprises four titles, three full hold titles and a leasehold title, plus a registered right of way. There's a plan, My Lord, at schedule three. That's at page 129, two pages on.

JUDGE MILES: Yes.

MS STACEY: Which shows the land and the private access track. This is all private land that we're dealing with here. There's no public land. Details of site one are, more specifically, set out in Mr Davis' statement at tab 16. Sorry, tab 16. Yes, tab 16 on page 139 of the hearing bundle. Specifically, from paragraph, from page 141.

JUDGE MILES: Yes.

MS STACEY: My Lord, in our skeleton, we describe the primary activities carried out there, what Mr Davis says in his witness statement at paragraph 17. It's the storage of aviation kerosene for onward transmission to Heathrow and Gatwick, the transfer of fuel products to neighbouring terminals, road loading of aviation kerosene and storage of interface material, which is a mixture of fuels, created as part of the pipeline operation. All of that happens at the site. Mr Davis also describes various title interests in paragraph 24 to 28 of his witness statement at page 143 of the bundle.

JUDGE MILES: Yes.

MS STACEY: That's site one. Site two, My Lord, is Kingsbury. Kingsbury Oil Terminal, which is in Warwickshire, which is described in schedule two of the Gleeson Order, if you go back to 127.

JUDGE MILES: Yes.

MS STACEY: Paragraphs three and four. It consists of two freehold titles and one leasehold plus a registered right of way. The plan is at 131 of the bundle, at schedule four of the order.

JUDGE MILES: Yes.

MS STACEY: That's the plan. Plus, again, the private access way. Then you have details of the site, site two, in Davis' first witness statement at page 142 of the bundle.

JUDGE MILES: Yes.

MS STACEY: You'll see at paragraph 17, sorry, forgive me, site two is from 143. Paragraph 29.

JUDGE MILES: Yes.

MS STACEY: Sorry, paragraph 20 is where he describes site two as being an oil storage depot when it was opened. Paragraph 21, key strategic importance to the UK and so on. That's where it picks up the site in its particular description.

JUDGE MILES: Yes.

MS STACEY: Those are the sites, My Lord. As far as direct action is concerned, what led to the injunction being granted in the first place, we deal with that in our skeleton at paragraph 14. There was a campaign back in April 22 that picked this up from your reading. Armstrong One is the witness statement that sets out the original background. That's at tab 17 of the bundle. At paragraphs 43 to 48, page 154.

JUDGE MILES: I have read those.

MS STACEY: You've read those. I'm grateful. You will have seen in that, he describes the groups, the direct targeting of sites and the relevant health and safety risks. Then you have Armstrong Three, which is the witness statement in April 2023. Armstrong Four, July 2023, and Armstrong Five, September 2023, all of which update the position prior to the various renewals.

The renewal before Mr Justice Rajah, that was Armstrong Three. Armstrong Four and Five were before Mr Justice Gleeson's final injunction.

Then, My Lord, Armstrong Six is what completes the suite for today's purposes. It's at tab 27, page 224, and that's the witness statement which describes why, we submit, there's a continuing threat of direct action. I'll come back to that but for present purposes, you'll find it at 27.

JUDGE MILES: Yes.

MS STACEY: Those are the statements. So far as the orders are concerned, My Lord, I'm sure you would have picked up, we had two initial orders. Mr Peter Knox, KC, the first order was on 12 April. That's at tab nine.

JUDGE MILES: Yes.

MS STACEY: The initial hearing. Then there was the return date order on 21 April, tab 11.

JUDGE MILES: Yes.

MS STACEY: Then you have the review a year later, tab 12, before Mr Justice Rajah, for a year, pending the final hearing, which led to the order of Mr Justice Gleeson, tab 13, on a summary judgment application.

JUDGE MILES: Did Mr Gleeson give any reasons when he granted the final injunction?

MS STACEY: He gave, yes, there's an extemporary judgment at the bottom of the file. It's in section F, additional documents. Tab 36, My Lord.

JUDGE MILES: I might just read that.

MS STACEY: Yes.

Pause.

JUDGE MILES: Yes. Was there a- Did Mr Justice Rajah- Here is one, sorry.

MS STACEY: Yes.

JUDGE MILES: Thank you. Let me just read that.

MS STACEY: Yes, tab 34.

Pause.

JUDGE MILES: Yes.

MS STACEY: We place particular reliance on paragraph 10 of Mr Rajah, which is the analysis of the continuing risk point, the effective deterrence, and on paragraph six of Gleeson, at page 558.

JUDGE MILES: Yes.

MS STACEY: Then, other relevant background. In our skeleton, you are referred to other injunctions, My Lord, granted to the energy sector. You say that forms part of the relevant backdrop. Various injunctions were referred to in the original witness statements, most specifically Armstrong Four, paragraph 45, that's page 204, and Armstrong Five, at paragraph 38, that's page 214.

Then, most recently, My Lord, in terms of Armstrong Six, at paragraph 59, that's page 231, he sets out there the updated position in a table. Then, if you go to the second table, at B, under the heading B, that's page 232.

JUDGE MILES: Yes.

MS STACEY: There are references to various injunctions. That includes the *Thurrock* injunction, that's the first row of the second table. That's the final injunction, My Lord. That's in the authorities bundle, at tab 12.

JUDGE MILES: Yes.

MS STACEY: There are a series of other injunctions, including the airport injunctions, over the summer of this year.

Then, My Lord, sorry, I'm taking this out of order, the top table, sorry, deals, most specifically, with injunctions granted to oil and gas companies. You'll see there, at the top, there's an interim injunction granted to Shell. My Lord, there has been a final hearing in relation to that, but we're waiting judgment.

You've got the order of Mr Justice Cotter. Then there's the *Esso Petroleum*, which is a final injunction granted in January this year. The *Valero* injunction, which was granted in January of this year.

Since then, per the authorities bundle, there's been the *North Warwickshire* injunction, that's at tab 12 of the authorities bundle. *North Warwickshire BC,* 6 September. That's the final injunction, My Lord, against a very similar backdrop, because it involved the Kingsbury Terminal, or parts of the Kingsbury Terminal. That was granted for a period of three years, because there had been an interim injunction in force for two years prior.

Then *Esso Petroleum* is at tab five of the authorities bundle. The final injunction was granted in July 2023. Mr Justice Linden here is reviewing that final injunction. No, that's not right. He's granting it, sorry. It was reviewed by Mrs Justice Tipples, sorry, in July 2024.

Then *Valero*, My Lord, I've taken you to, and then you've got reference to *Shell*. There are various injunctions that have been granted as a result of materially similar campaigns against the oil industry. Armstrong Six refers to the other injunction preceding that, paragraph 59.

Pause.

JUDGE MILES: Yes.

MS STACEY: Taking you then to part four of these submissions, evidence of continued threat, My Lord. We deal with this in Section B of our skeleton, in paragraph 19 onwards.

JUDGE MILES: Yes.

MS STACEY: In its opposition we say there that there does exist a continued threat of trespassing and nuisance at the sites. We say that, effectively, for five separate reasons. Firstly, we rely on the original incidents that there were, as set out in Armstrong One. I'll give Your Lordship

the references. Paragraphs 44 to 45, that's page 155 and Armstrong Two, at page 172, paragraphs 12 to 17.

JUDGE MILES: Yes.

MS STACEY: Which refers to the original campaign and the nature of the protest activity, which mirrors, essentially, that described in the *North Warwickshire* judgment, which I've just taken Your Lordship to.

Secondly, we rely on the further incidents referred to in Armstrong three, at paragraphs 11 to 19 and that's 181 of the bundle. We thirdly rely on the ongoing direct action by Extinction Rebellion and JSO against the energy sector generally, since September 2023 to 4 November of this year and that's Armstrong six, rather, from paragraph 20. Paragraph 20 to paragraph 47. My Lord, shall I turn that up?

JUDGE MILES: I have read that.

MS STACEY: You've read that, I'm grateful. Fourthly, we rely on the statements and the commitment to the campaign of direct action, which includes invitations for others to be recruited and to join and that's in Armstrong Six, My Lord, at paragraphs 48 to 58. Armstrong Six, specifically, refers to, and I can take you to a few references, but to campaigns in relation to airports, demands in relation to insurance of climate breakdown, that's the ongoing campaign.

If I ask to take you to the Exhibit Bundle, My Lord, that's page 260. I'll just give you some examples, just to see how this campaign has been evolving. If I can take you to the EB4 bundle, which is the Exhibit Bundle to Armstrong Six. Exhibit two Armstrong Six. I think it's entitled Exhibit Bundle for Use at Hearing of the Review.

JUDGE MILES: Maybe this one. Where am I going in this one?

MS STACEY: Page 210. I'm just going to give you a selection, if you like, of exhibits.

Pause.

JUDGE MILES: Yes.

MS STACEY: Two hundred and ten is referring to a summer campaign, which preceded the series of airport injunctions, which are set out in the table to which I referred Your Lordship. That's later this summer.

Thereafter, My Lord, 260 of the same bundle is an example of a further development of the campaign. It's 260 to target insurers of climate breakdown in October 2024. Then most recently, at the end of October, there was, if you look at 279, an Extinction Rebellion protester climbing outside the insurance office building.

I'm taking you there not, specifically, because it relates to what forms the subject of today's hearing, but to show you that there have been developments, the campaign has evolved. There have been invitations on the JSO website, 247 of the bundle, My Lord, if you would. That's a screenshot of the JSO main website page, which sets out an invitation to join them. If you see under the capital letters, it says where are we at in the various demands. Demand Two, Just Stop Oil by 2030.

You've told me, My Lord, that you've read Armstrong Six. That sets out in much more detail the evidence of the campaign, the action, the evolution since the Gleeson Order was made and why we say that the threat certainly hasn't diminished and why there seems to be very clear evidence of the continued intention to pursue the campaign and to target the oil and gas industry specifically, and why we maintain that the threat exists today just as much as it existed a year ago before Mr Justice Gleeson.

I'm very happy to take Your Lordship to any specific parts of that evidence if you'd like me to walk you through it.

JUDGE MILES: We are just going back to the original campaign in 2002.

MS STACEY: Yes.

JUDGE MILES: Were there protests outside the site and at the entrance and so on?

MS STACEY: Inside.

JUDGE MILES: Which? There is some evidence that the perimeter fence was broken into-

MS STACEY: Yes.

JUDGE MILES: -and people within the site. Where are they on the site? Are they on private roads within the site or are they further in?

MS STACEY: In relation to site one there was an incursion into the site involving the cutting of gates and actual access into the site and locking on which resulted in arrests. In terms of where they were, they were both on the private road and inside the perimeter fencing. You see that from Armstrong.

JUDGE MILES: I am just looking at that, paragraph 44 of Armstrong One.

MS STACEY: Armstrong One, yes. That deals with site one which was most directly-

JUDGE MILES: Oil Road is within the perimeter fence.

MS STACEY: That's the private road internally within the perimeter fence, yes. In relation to site one, very specifically, there were clear and direct incursions into the site and then site two is described in paragraph 45 of that same statement and the examples include obstructions

and access to parts of Kingsbury Terminal but not the parts owned by the claimants which resulted in arrests.

In relation to site two it was more a case of obstructing but there were no direct trespassers into site two.

JUDGE MILES: But they were blocking the entrance essentially.

MS STACEY: They were, and they had trespassed and gained access to other parts of Kingsbury Terminal and those are the parts which form subject of the *North Warwickshire* injunction and *Valero*.

JUDGE MILES: It was one of the allegations that blocking the entrance was itself a tort?

MS STACEY: Yes at one point. Originally when the injunctions were first granted I think this is right it may have included an area of the public highway, but care was taken to ensure that the injunction was narrowly circumscribed, so it did no more than the minimum required to protect the claimants' rights and that was the decision taken in circumstances where there was an injunction by North Warwickshire which protected some areas of the site.

In the circumstance of this case it was considered that we'd protect the private areas and not extend the injunction beyond that. My Lord, you may have picked up that in this transcript of the extemporary judgment before this Justice Gleeson he, specifically, makes the point I think that he notes that the injunction does no more than prevent trespass and nuisance.

JUDGE MILES: Well I am just looking because if Kingsbury site two the injunction the second offence forbidden from obstructing or otherwise interfering with the first claimant's access over the private access road on the land adjoining site two. How does that work? Can you show me that on the map, so I understand it.

MS STACEY: We're looking at Mr Justice Gleeson's order.

JUDGE MILES: Well I am looking at his order-

MS STACEY: Yes.

JUDGE MILES: -at paragraph 1B2.

MS STACEY: Sorry forgive me I'm just working electronically so I'm scrolling up and down.

JUDGE MILES: That is page 122.

MS STACEY: 1B2. That road can be seen at page 129, and you see a little hatched area a little wedge.

JUDGE MILES: No that is the wrong site I think.

MS STACEY: Kingsbury site two you're quite right. Access to shaded two on site two plan. I'm so sorry. Site two plan is at page 131, and you see the access way on that plan shaded blue

which is an access way over which we have rights away so it's a private easement to access that area.

JUDGE MILES: Is Piccadilly Way a private-

MS STACEY: Piccadilly Way is a public highway, but the area shown hatched blue is a private right of way which adjoins Piccadilly Way so private land. I believe that's described in Mr Davis' first witness statement.

JUDGE MILES: The injunction it stops any interference or obstruction-

MS STACEY: With that private access way.

JUDGE MILES: -over that road.

MS STACEY: Page 140 may help Your Lordship, paragraph 8b of Mr Davis' first statement which simply recites what we are asking the Court to prohibit but it does refer to over the private access road on the land adjoining site two which is shown shaded blue on the plan.

JUDGE MILES: What is the legal basis for such an injunction? Is it that it is-

MS STACEY: It's a nuisance because if you interfere with a private access way you are starting to interfere with the use of an access way then that's a nuisance.

JUDGE MILES: Right, so-

MS STACEY: It's a tort of nuisance.

JUDGE MILES: -it is a tort of nuisance.

MS STACEY: Yes and that's pleaded, My Lord, in the claim. Trespass in relation to the areas which we have possession and control and nuisance in relation to the rights interference or substantial interference rather with the rights which we're entitled to enjoy.

It may help if we can turn to the particulars of the claim which are on page 13 of the hearing bundle. If I can take Your Lordship to that I think it puts it into context.

JUDGE MILES: Yes just a minute.

Pause.

JUDGE MILES: Sorry where was I?

MS STACEY: Page 14 of the hearing bundle.

JUDGE MILES: Yes.

MS STACEY: This sets out then the various definitions on page 14. If I can ask you to turn to page paragraph 1.2. Description site two is a reference to the following property so freehold land described by conveyance. Then marked on the site two plan and then lands to the south east of Trinity Road marked two on the site plan, and then leasehold lands at Kingsbury.

Then if you're under the heading of the claimants there's a reference to the first claimant being the freeholder of parts of site one, first claimant then being freeholder of parts of site two. Then 2.3 pursuant to clause two, schedule one of the lease referred to above that was the lease under 1.2.2, the first claimant enjoys a right all times without vehicles to enter upon that's the site one access route. Then paragraph 2.5 pursuant to clause two of the site two lease also enjoys a right over the site two access route. That's the source of the right.

JUDGE MILES: Yes.

MS STACEY: Then there's a description of the campaigns in paragraph three.

JUDGE MILES: Yes.

MS STACEY: Paragraph 3.3 "By reasons of the facts and matters last sub-paragraph an injunction is sought to forbid second defendants from interfering with the right to pass and repass over the site two access route as the right of passage", and that's found it a nuisance.

Obviously, at the previous hearings the claimant had to establish that there was a serious issue to be tried in relation to all that and then there was a valid cause of action which was one of the requirements.

Sorry if you go back up to 3.2 where the cause of action is more specifically spelt out, 3.2 second sentence, "There is also a real and substantial risk of imminent act of nuisance affecting the site one access route and/or the site two access route". It sets out they why this has arrived[?].

JUDGE MILES: Yes. The reason I raise that is some of the direct action appears to, effectively, have been to block access to the sites rather than within the sites but your answer to that is that constitutes a nuisance.

MS STACEY: Indeed. That enables us to extend the order sought from within the site to the access route over which we have established rights.

JUDGE MILES: Yes.

MS STACEY: I was taking you, My Lord, to the various pieces of evidence where we say there is a continued risk and the final component which I touched on is the air force campaign which was pursued over the summer of this year.

There is a press release, My Lord, dated March 2024 which sets out the intention and that is at page 143 of the exhibit bundle. I will ask you to have a look at that. One hundred and forty three which starts at 142. That's dated 3 March 2024. Just Stop Oil press release. The last paragraph on that page is the one I would ask you, specifically, to look

at. "Just Stop Oil continues to be a major focus until we win. Three part demand this summer refers to campaign high level actions at sites of key importance airports".

That indeed did lead to a number of airport injunctions to prevent direct access over the summer. If you like that's the fifth evidential component on which we rely at paragraph 20 of our skeleton argument.

JUDGE MILES: Yes.

MS STACEY: My Lord, it's also important to bear in mind the deterrent effect. We say that the injunction is still effective as a deterrent. Obviously, courts grant injunctions on the assumption that they will generally be obeyed and is entitled to expect that no breaches would occur since the interim orders have been in place. We say the absence of any breaches is testament to the effectiveness of the order rather than any evidence of undermining the need for the order.

That's borne out, My Lord, we say, by some tweets that are made by the defendants or Just Stop Oil, specifically, there are two tweets I'd like to refer Your Lordship to. One is in EB2. In fact, I need only, necessarily, give you the reference because I did say I wasn't going to take you to underlying exhibit details.

This is EB2 page 731, which is a tweet dated June 2023, but I would like you to look at September 2023 tweet which is in EB4 the exhibit bundle you have open there at page 12.

JUDGE MILES: That is the one that is quoted is it?

MS STACEY: That's the one that's quoted-

JUDGE MILES: Paragraph 17.

MS STACEY: Yes. I'll read out the- because I put it electronically, I'll just read out the June 2023 tweet. It says this, My Lord, and I can take you to it if need be, "Do you know what happens if you protest outside oil refineries now? Oil companies have brought injunctions to ban people from taking action at refineries, distribution hubs and even petrol stations. Punishments for breaking injunctions range from unlimited fines to imprisonment".

That's all it says but it's, essentially, acknowledgement that there are going to be consequences and, we say, that's confirmation of, if you like, the deterrent effect. That's June 2023 and September 2023, more specifically, refers to the fact that fossil fuel companies have taken out private injunctions that make protesting possible at oil refineries. Again, that's further confirmation of the deterrent effect.

JUDGE MILES: Yes.

MS STACEY: That's deterrent effect. Then finally, My Lord, harm. In that skeleton argument in paragraph 22 we emphasise the, potentially, very serious harm and damage that will ensue if the Gleeson order were discharged and activities were to resume at the site. Potentially very grave and potentially fatal health and safety consequences. That's described in Armstrong One paragraphs 18 to 42.

JUDGE MILES: Yes.

MS STACEY: You see the references there; the *Esso Petroleum* case refers to the sorts of risks that exist at sites such as this. My Lord that's the fourth section on why we say nothing has materially changed. Fifthly, therefore, can I take you to our submissions on this review.

I propose to deal with this in two parts as per the skeleton argument. The first part, My Lord, is to try and satisfy you that nothing has materially changed and that would involve some overlap with what I've just been going through.

Then secondly, I'll take you through the 15 Valero requirements following the Supreme Court decision in *Wolverhampton*.

JUDGE MILES: Yes.

MS STACEY: In terms of nothing materially having changed, as I have already submitted we say there continues to be a threat of trespass and nuisance to the sites for the reasons I've set out. There's no other evidence that undermines that we say. Most specifically My Lord no one from the campaign has disclaimed any intention to pursue.

It would be very easy for someone to come up and give an undertaking on behalf of the group that they are turning their sides elsewhere and have decided to do things differently. That hasn't happened as far as we're aware, My Lord, no injunction has been discharged.

Since it's been granted to a law company on the basis that their level of threat has diminished. Rather it points in the other direction. Injunctions have been continued and there's been no change in terms of the deterrent effect for the reasons I've already sort of explained. That's an evidential. There's no evidence that suggests there's any change.

In terms of material changes to the law, My Lord, we deal with this at paragraph 28 of our skeleton, what we're talking about here are the further criminal offences under the public order act 2023 which were not in place at the time of the Gleeson order. Specifically sections one which is locking on, section three tunnelling and section seven interference with key national infrastructure.

My Lord, the offences are in the authorities bundle at tab three and I can take you to the specific terms of those offences if need be. Essentially, the argument is that the existence of the new offences might make the need for the injunction now uncompelling.

Our position in relation to this is we fully accept that this amounts to a material change of circumstance the Court has to consider but it's certainly as Mr Justice Cotter put it I think, "Not a knockout punch", and on the backs of this case it makes no difference. If I can make a few points to expand on what we say in our skeleton you're referring to the offences.

JUDGE MILES: I am just looking at the offences.

MS STACEY: Sure.

Pause.

JUDGE MILES: Yes.

MS STACEY: My Lord, I've got my cases mixed up. I was mixing it up with *Shell*. These offences were in force at the time of the Gleeson order because they came into force in May of last year and the Gleeson order was in October of last year.

We make the point in our skeleton that that didn't preclude Mr Justice Gleeson from granting the order at the time he did, although there wasn't specific consideration of this issue.

If I can make three points to expand on what we say in our skeleton about this; firstly, the criminal offences do not provide the same protection, and this is the point we make in sub-paragraph A of paragraph 28 in our skeleton.

Civil injunctions differ from criminal proceedings in that they address prospective behaviours. They stop the harm from happening, avoiding the harm, whereas the criminal proceedings only swing in once the harm has occurred, so retrospectively. Parliament, we say, hasn't legislated in a way that prevents prospectively the prevention of future conduct, and they claim it is entitled to rely on the civil injunction for that purpose.

JUDGE MILES: I am not sure I really understand that point. I have seen that that has been made in a case but the reality here is that these injunctions, if made, only stop people in the sense that they obey them. The reason for them is to be able to take steps which include fines, imprisonment and so on if they do not obey them.

MS STACEY: To enforce, yes.

JUDGE MILES: It seems to me that the criminal law is doing the same thing in that sense. It is saying to people you shall not, for example lock on, you shall not tunnel, and people are then liable to be punished if they disobey those statutes. I do not really understand this point.

MS STACEY: No. In the sense that the criminal offence is there and then it has the consequences it would have if the offence was committed. I take that point. Whereas the injunction is secured by a private individual. It has something in its hand if you like.

JUDGE MILES: I understand that point and it then becomes a measure for the claimant to decide what steps to take.

MS STACEY: It's in the driving seat if you like in control of-

JUDGE MILES: Rather than it being in the hands of a prosecuting authority.

MS STACEY: Stretched resources that may or may not decide that it's sufficiently importioned and indeed dictate the timetable. They're not providing the same protection for the first reason but if you like it might not be as forceful.

More specifically for the second reason because once the order is in place that enables a claimant, the very party that would suffer the harm that is thought to be prevented from enforcing it and deciding what's in its best interests. It keeps control of the claimant.

JUDGE MILES: Yes.

MS STACEY: In this case, perhaps all the more important because we're dealing with private land and the claimants have got article one, protocol one rights and should be entitled to rely on their rights of possession and control and their reasons to control the access to which they're entitled.

Thirdly, My Lord, and very unfortunately, one can't safely assume these defendants wouldn't be deterred, sufficiently deterred by the existence of the criminal processes. Back to Your Lordship's point it may be inferred that the criminal process doesn't provide the same degree of deterrent effect.

I took Your Lordship to the tweets which refers specifically to private injunctions, and I think the history over the last few years has borne out the fact that the injunctions, civil injunctions have deterred protesters to a greater extent, perhaps because they don't go before juries in those circumstances. The evidence also suggests that there would not be a sufficient deterrent.

As we set out in our skeleton the offensive aggravated trespass was in place at the time of the original injunction and that was not a deterrent. Some of the unlawful activity referred to in the evidence is quite, manifestly, criminal, that the existence of the offences was clearly not a sufficient deterrent. The recent conspiracy to cause damage at airports bears that out yet further.

Those submissions, My Lord, are supportive, and I myself am in good company if you like because in the authorities, firstly I would say that the *Valero* cases and the airport injunction

cases granted civil injunctions despite the offences being forced so one can take what one wants from that. More specifically there are a series of cases which refer to this new offences circumstance and did not find it a reason to refuse to grant a civil injunction.

You've got *Drax Power,* My Lord, that's at tab 11 of the authorities bundle, that's the first case that's in July of this year. Mr Justice Ritchie, page 260 paragraph 24. This was a final injunction case. I will just check that's correct. Oh no it wasn't, so sorry, it's an interim injunction case. Paragraph 24 sets out arguments as part of the [inaudible] obligation and if you could take it up from, "They have made reasonable submissions on the public order act", at paragraph 24.

JUDGE MILES: Yes.

MS STACEY: I'm asking you to read down to the bottom of that paragraph please.

Pause.

JUDGE MILES: Yes.

MS STACEY: If I can ask you to pick it up back up at paragraph 28, two pages on, which makes the point that there has been no obvious deterrent effect.

The next case, My Lord, I'd like to take you to is *North Warwickshire.* That's at tab 12 of the authorities bundle. Page 290 paragraph 88. This is Her Honour Judge Emma Kelly. I'll just ask you to read paragraph 88 in its entirety.

Pause.

JUDGE MILES: Yes. The Judge makes a point at the end that sort the of perspective, retrospective point but I am not, for the moment, particularly impressed by that.

MS STACEY: The difference might be, My Lord, that you have a crime on the statute books, and it might not be so visible. Whereas, if you've got an injunction you then serve it by putting up a warning notice on the gate.

That has a deterrent effect, as a consequence practical consequence if you like, but the injunction having been secured, it having gone before a Court, that, I suggest, does make a difference in terms of the protective nature, conceptual protective nature even if in practical terms they're both trying to do the same thing.

The criminal, I suppose, the criminal offence is more generic. You're not, specifically, referring to a specific site, you're one stage further down the line.

Pause.

JUDGE MILES: Yes.

MS STACEY: That's *North Warwickshire*.

JUDGE MILES: One of the aspects in cases like this is that civil disobedience involves breaking the law.

MS STACEY: Yes. Not necessarily the criminal law.

JUDGE MILES: No, but breaking some-

MS STACEY: Unlawful activity.

JUDGE MILES: -law.

MS STACEY: There does.

JUDGE MILES: There does seem to be some evidence here that these injunctions do have a deterrent effect.

MS STACEY: Yes. Then *HS2* is the next case, My Lord, tab nine of the authority. Another Justice Ritchie case. This was a review hearing. If I can ask you to look at paragraph 204 I think. Yes, 204, paragraph 32.

He starts by setting out the test on a review of an interim injunction. This Court is not starting to know though and then it's not to ask the Court on a view to query or undermine those, that's the findings. It's vital to understand why they were made, to read and assimilate the findings, to understand the substrata, the reasons for fear, then it is necessary to determine, on the evidence, whether any material has changed, if nothing on the material has changed the risks that exist for and so on.

Those are the paragraphs I took Your Lordship to earlier and then at 210, which is 209 is where it starts, paragraph 38, right down the bottom of that paragraph you'll see a sentence starting, "Furthermore D62-

JUDGE MILES: Yes.

MS STACEY: -submitted that a new criminal offence has been created", which meant over the page there's no need for continuation it was submitted that had an alternative remedy. Then there was a further submission about breaching a duty. His analysis is then set out further down but in paragraph 39 he says there have been clear and obvious changes which are material, and he discharges, essentially, the injunction in relation to phase 2a and phase 2b, on the basis that they weren't being pursued, they'd been dropped, those areas of land which took away the primary objective.

Then he extended the injunction you'll see further down paragraph 44 page 211, in relation to the rest. At the bottom of paragraph 45, the last sentence, "The past and recent evidence does support the continued injunction covering the construction works in phase one", so there's the other phase.

My Lord, there was consideration, if you like, of the new offence's point but it wasn't considered by Justice Ritchie a reason for not continuing the injunction. Then, specifically My Lord, before you leave that authority, page 214, paragraph 55, to complete the picture, "There are compelling reasons to continue the injunction over purple land I do not consider", those are the bits that he discharged for the reasons set out. In summary he says the reasons are, "This part of the project has been abandoned, there are alternative remedies because the Public Order Act provisions are in place.

The evidence provided to the Court did not reach the required level to show a real and imminent need. There are factors which he relied on in order to discharge that component but in circumstances where he was satisfied there was sufficient evidence in relation to the rest, the Public Order Act point didn't justify the discharging of the injunction.

Finally, My Lord, you have Mr Justice Cotter's judgment in the *Shell* case, which I handed up just before you came in which you may have read. It starts at paragraph 22. This contains some detailed analysis of the point that was made by a litigant-in-person at the review hearing. You can see the submission at paragraph 22. Paragraph 23 describes the offence as does paragraph 24. The arguments summarised at paragraph 25 and then the analysis starts at paragraph 27. I'm going to ask you to read that all the way down, My Lord, to paragraph 40.

JUDGE MILES: Yes.

MS STACEY: Back to my original submission, My Lord. This is a relevant factor, quite right for the Court to consider it, but it doesn't change anything on the fact of this case. Section two of this part, at *Wolverhampton*, we address in our skeleton My Lord, at paragraph 29.

The starting point is that the Supreme Court decision in *Wolverhampton* hasn't materially changed the legal test. The Supreme Court confirmed that there is jurisdiction for the Court to find injunctions against persons unknown but reformulated the questions that are to be asked.

We've set out those questions at paragraph 29 and addressed why, we say, they've been satisfied, and I don't think I can improve those submissions by reading them out.

JUDGE MILES: Yes.

MS STACEY: That's *Wolverhampton*. That doesn't affect the basis on which the case in order was granted.

Unless I can assist you in relation to the substantive case My Lord, those are our submissions on that. I then propose to turn to the ancillary application to amend.

JUDGE MILES: Yes.

MS STACEY: The application itself is at page 34 of the hearing bundle and in a nutshell, My Lord, this is an application to dispense with one component of the alternative service provisions insofar as it continues to apply. The reason I qualify in that way will become clear because we're not at all sure it does apply to future documents at this point in time.

The application, you'll see at paragraph three on page 34, is framed as an order for any requirement in the interim orders, that's the Peter Knox and the Rajah orders. Any requirement in those to be dispensed with insofar as they require documents to be affixed in clear transparent sealed containers.

Then paragraph 6b of the order of Mr Simon Gleeson to be amended to remove that requirement. The context, My Lord, for this is that we previously applied to serve by alternative means and that included a requirement to fix the document in a plastic box. You've got photographs of the containers in the exhibit bundle at page 320 so you can see what we're talking about.

JUDGE MILES: How did this come about?

MS STACEY: It came about because we were trying to deal with these cases to search for as many methods as possible which would bring the documents to the attention of people. This was added in, I think, because there was concern about notices, potentially, blowing away. I'm just going to turn my back as [inaudible] was at the hearing and I wasn't.

It was in order, I'm told, to ensure that those attending site and who wanted to read all the documents that were available had the opportunity to do so when they attended the site, as opposed to going away and looking at the documents via the link. It's that facility that was being provided. You can see that there contained, there are two photographs, and I'll take you before I talk about why we want to dispense with this specific-

JUDGE MILES: Has this been a requirement in other orders?

MS STACEY: It's unusual. No I haven't seen it before and indeed you'll note in our submissions, in our skeleton argument, as a reference to the BBC Radio 4 piece which described this as rather bizarre, the concept of having a box with degraded documents such with degraded documents for people to leaf through was quite bizarre.

That's referred to in Armstrong Six at paragraph 68. I haven't come across this myself, personally, one usually has the warning notice, the upload, the emails and personal service if you manage to identify people. Potentially social media accounts, again, if you manage to identify people.

My Lord can I take you to the orders just so we can see whether or not this does in fact apply and whether we ought to be concerned about it. The underlying orders of Peter Knox, tab nine, we'll start with that if I may. Paragraph 13A that's at page 59. That's this order so that's the original order and you'll see there in paragraph 13A reference to clear transparent sealed containers.

JUDGE MILES: Yes.

MS STACEY: That serves for this order and any further evidence to be relied upon on the return date and then definition of the court document shall be affected as follows and then the container method. You get to the next order which is Tab 11, paragraph 13 that's page 87. Actually page 91, My Lord, sorry.

JUDGE MILES: Yes.

MS STACEY: Ninety-one. Thirteen is at page 90 which is the method of service of this order and the note of hearing. You then see again the containers method and if you go down the page and take paragraph 16 which is the method of service for future applications and evidence and support, you again see the container method at that subparagraph.

Then one gets to Mr Justice Rajah's order tab 12, paragraph 6B which is on page 106. He says service of this order shall be affected as follows and you've got the containers method at subparagraph B. Then if one goes down the page to paragraph nine which is future applications and evidence and support you see, My Lord, that the containers method drops away.

JUDGE MILES: Yes.

MS STACEY: There's been a deliberate move away from this method and I'll come to the reasons for that which is, essentially, the basis of this application. It doesn't feature in relation to future applications.

Finally Mr Simon Gleeson's order page 123 bottom of the 122 is service paragraph six, that's this order. Again, you have service method in containers back in subparagraph four that's in relation to his order. Finally at paragraph nine service of future applications and any other documents, any notices of hearing and their evidence and support shall be affected as follows. No reference to the containers method.

The concern is that Mr Peter Knox's order, that's the second order, catches future applications and evidence and support in this claim. That's 16A and that could conceivably cover future applications in this claim so an abundance of caution, My Lord, you've made this application, and I need to explain to you-

JUDGE MILES: I do not think that can be right in the light of the fact that that was just an interim order, and a final injunction was granted by Mr Gleeson. Just as a matter of interpretation it seems to me plain that the later orders supersede the earlier ones-

MS STACEY: Supersede the earlier ones.

JUDGE MILES: -but where does that lead things as regards paragraph 6B of Mr Gleeson's order?

MS STACEY: Well that, as a matter of interpretation, could be said to only relate to service of this order. We're asking for an order that no order be made in relation to Mr Gleeson's order it should stand.

JUDGE MILES: The box will stay there?

MS STACEY: The box will stay there.

JUDGE MILES: But containing just his order?

MS STACEY: Which could cause confusion. Perhaps I should jump to the reasons why we-

JUDGE MILES: What are you asking for? That it be varied to remove that?

MS STACEY: Yes. The order that we're seeking is an order that the-

JUDGE MILES: Where is the-

MS STACEY: It's in the hearing bundle, My Lord, at tab section B.

JUDGE MILES: Seven is it?

MS STACEY: Yes, seven page 40. You see at paragraph two on page 41, any requirement to continue to be dispensed with and you may take the view there's no requirement but in any event I'd ask that to be dispensed with.

Paragraph three, 6B be amended such that respectively we can, effectively, serve by other methods but not by the method set out in the containers-

JUDGE MILES: What is the method?

MS STACEY: The methods that would be left would be the warning notices being fixed as they currently are being, the email addresses being used and the upload link. Any future document including this order, if Your Lordship wanted to make one, would be served by those three methods and we say that those are sufficient to bring-

JUDGE MILES: What does paragraph three mean? It says that it be amended. Is that not already contained within-

MS STACEY: What three is, perhaps inelegantly, trying to say is that service be affected by placing copies of the Gleeson order next to the warning notices rather than in the box. It would be displayed at a minimum number of two common locations on the perimeter but not, necessarily, by putting them in containers.

JUDGE MILES: That is not what this says. This says paragraph 6B of the Gleeson order be amended so that respectively the claimant is permitted to affix copies of the Gleeson order. That has nothing to do with this order.

MS STACEY: No. Well 6B only refers to the Gleeson order.

JUDGE MILES: That is what I am saying. What I do not understand, at the moment, is why that is different from the existing 6C which is the warning notices. Is it something additional to the warning notices?

MS STACEY: The warning notices form is set out in schedules five and six so let's just look at those.

JUDGE MILES: What does it mean, 'Affix copies of the Gleeson order'?

MS STACEY: It's a copy of the order itself in a clear plastic envelope, if you like, to protect it from the weather next to the warning notices. The warning notice, My Lord, you see a copy of at page 133 of the bundle, which looks somewhat different. They might communicate the same message but they're not quite the same thing.

JUDGE MILES: It is the idea to use a plastic envelope and then put that next to the existing warning notice?

MS STACEY: What that does, My Lord, I suggest it corroborates what's set out in the warning notice. Warning notice says here's a notice of the order and this summarises what it does, and this is the plan. The order itself next to that is complementary of what is set out in the warning notice. On one view you may say one might say that we don't need the both, the warning notice is sufficient. We could be asking for rather more namely a complete dispensation of any requirement to fix copies.

JUDGE MILES: If it is put next to, this says in a minimum number of two locations, is there any reason why it should just not be put next to each of the warning notices that you have already got?

MS STACEY: No reason. In fact, it makes sense on the analysis I've just outlined if it's corroboratory or complementary then it makes sense for them to be next to each other.

JUDGE MILES: What this would consist of is some sort of plastic envelope next to the existing notices containing a copy of the Gleeson order?

MS STACEY: Yes. Secured by cable ties on the [inaudible] fencing. Sorry I was hearing whispers. Can I just turn my back. Very fairly the point has been made that there are a substantial number of warning notices around the perimeter. It's not limited to simply two. Whereas the containers requirements is for a different purpose mainly to see the underlying document.

What we don't want to do is to have to put the underlying document on each and every location where there is a warning notice.

JUDGE MILES: Why not?

MS STACEY: It goes beyond what is necessary. The question for the Court is what is reasonably necessary in order to bring, what's the purpose here to bring to the defendants attention the fact that the order has been made.

If the Court were of the view that it was necessary in order for the defendants to know about this order, to place the order itself next to each and every warning notice, then I might be more difficult, but we think that's not necessary, that's over and above what's required and in those circumstances it's disproportionate I suggest to do it any more than two locations.

JUDGE MILES: When I say why not, is it just-

MS STACEY: It's time-

JUDGE MILES: -cost or what? It is not going to cost very much to do this.

MS STACEY: I don't have any details of what it might cost to do that but what that would amount to, My Lord, would be an enhancement of what the Courts have already ordered. There was a provision for documents to be affixed at two locations in addition to warning notices and all we're doing is asking the Court to tweak that requirement by enabling us to place the document in a more practical way.

As to your question why not it would require more orders to be printed out, plastic envelopes to be secured, maintained and us to be satisfied that they remained in place at all locations.

JUDGE MILES: Really all you are asking for then is what we have got at the moment is these boxes sitting there on the ground with documents in, in two locations. What you are really saying is can we move away from boxes to have envelopes up on the fence-

MS STACEY: Yes.

JUDGE MILES: -in two locations.

MS STACEY: In two locations.

JUDGE MILES: Right.

MS STACEY: We're content to ensure that those locations are where warning notices are displayed but only in two locations. The reasons for the order, I haven't taken you to, but set out in Armstrong Six, My Lord, we summarised them at paragraph 34 of our skeleton, there are good practical reasons I suggest.

JUDGE MILES: I have to say I am not very impressed by the second point.

MS STACEY: The second point?

JUDGE MILES: And the third point. The point about the costs here, I would have thought go minimise. Just get a new box. Just thinking about how much these proceedings cost and to be complaining about the costs of a new box I think is pretty unimpressive.

MS STACEY: Yes. My Lord, that may very well be true. May I mention that it's more about having to ensure, if that is indeed the obligation, on one view you're only required to put the documents in the box once and you're not required to have an ongoing duty to ensure the documents remain there.

Indeed there was an exchange before Mr Justice Rajah that you only actually have to fill them once. In a way if they've degraded and it's not incumbent on the claimants to sort that out. This method, My Lord, would be more practical. It would enable the claimants to ensure that they remain visible and capable of being seen and that's surely the purpose of the terms of service.

For all those reasons I'd invite you to adhere to that application insofar as necessary we can provide Your Lordship with amended wording to reflect what we've been discussing.

JUDGE MILES: Yes.

MS STACEY: Unless there are any other issues I can assist you with those are our submissions.

JUDGE MILES: I will give a judgment.

Judgment transcribed separately.

JUDGE MILES: One other point I noticed in the draft order was that it talked about reserving the costs. Is that realistic or should it just say no order as to costs or be silent on the question?

MS STACEY: Can I just get confirmation about that?

JUDGE MILES: I do not feel strongly about it. It just seemed to me that there was- It is when is this ever going to actually be-

MS STACEY: Because it's quasi-final as opposed to being final it's really to want to keep the- This debate was had before Simon Gleeson and the purpose of the reservation was to ensure that if somebody does come up and seek to unpick the order there's an ability for the claimant to seek a proportion of the costs that have been incurred from that individual.

That's all and to reflect the fact that the order isn't final in the true sense of the word. As we currently stand no person has identified themselves as being sufficiently interested to attend court in contrast with other cases. As long as the order remains quasi-final as opposed to final I submit that there is a justification for the reservation to continue as it appeared before Mr Justice Gleeson and that no material change of circumstances has occurred so as to change that.

A

The fact that it's only been one year since the order that no person has attended court today isn't sufficient I suggest to unravel that. Then time may come, My Lord, and I fully accept that when one does need to revisit the basis but as we currently stand the principle remains valid.

B

JUDGE MILES: Right okay. I will leave costs reserved in the order just against that contingency.

MS STACEY: I'm grateful My Lord.

JUDGE MILES: Is there anything else. Thank you very much for your submissions and a very helpful skeleton argument.

End of Hearing.

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Neutral Citation Number: [2024] EWHC 3549 (Ch)

Case No. PT-2022-000303

IN THE HIGH COURT OF JUSTICE
BUSINESS & PROPERTY COURTS OF ENGLAND & WALES
PROPERTY, TRUSTS & PROBATE LIST (ChD)

The Rolls Building
7 Rolls Buildings
Fetter Lane
London
EC4A 1NL

20 November 2024

Before:

THE HONOURABLE MR JUSTICE MILES

B E T W E E N:

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

Claimants

-and-

PERSONS UNKNOWN

Defendants

Myriam Stacey KC and **Yaaser Vanderman** (instructed by **Fieldfisher LLP**) appeared on behalf of **the Claimants**

No appearances by or on behalf of **the Defendants**

Hearing date: 20 November 2024

APPROVED JUDGMENT

Mr Justice Miles:

Introduction

1. This is a review hearing in respect of a final injunction granted for five years by Mr Simon Gleeson sitting as a Deputy Judge of the Chancery Division on 6 October 2023 ("**the Gleeson order**") following an application for summary judgment.

2. The Gleeson order provided for an annual review of the injunction and this is the first review hearing. There were previously interim injunctions made by Mr Peter Knox KC, sitting as a Deputy High Court Judge on 12 April 2022 and 21 April 2022. The interim injunction was reviewed by Mr Justice Rajah on 21 April 2023.

3. The original evidence before Mr Knox KC included statements from Mr John Armstrong. He has provided further statements in relation to the application before Mr Justice Rajah in April 2023 and the application for summary judgment made to Mr Gleeson in October 2023.

4. Mr Armstrong has now made a sixth witness statement dated 4 November 2024 which updates the position. There are also two witness statements made by Mr Anthony Phillips dated 23 November 2023 and 11 November 2024 which deal, respectively, with service of the Gleeson order and service of notice of this review hearing.

5. I was also provided with certificates of service dated 12 November 2024 and 15 November 2024 relating to the bundle for use at this hearing, and the claimants' skeleton argument and authorities bundle, respectively.

6. I was also provided with copies of emails to relevant email addresses of Extinction Rebellion and Just Stop Oil, the two campaign groups affected by the Gleeson order, notifying them of the date and location of this review hearing. Nobody has acknowledged service or served any other documents in relation to these proceedings. There was no attendance by any person who might have made submissions on behalf of the defendants at the hearing before me.

Service/notice

7. I start with the question of service. Strictly speaking in relation to claims against persons unknown, service does not take place. Rather the question is whether they have been notified: see *Wolverhampton City Council & Ors v London Gypsies and Travellers & Ors* [2023] UKSC 47. However, for convenience I shall refer to it as service.

8. I am satisfied on the basis of Mr Phillips' second statement that the Gleeson order was served according to the alternative methods set out in paragraph 6 of the Gleeson order. I am satisfied by Mr Phillips' third statement that the necessary documents, including the application notice filed in respect of this review hearing, were properly served.

9. I am also satisfied by the certificates of service and the emails mentioned above that the persons unknown, who might be affected by this review hearing, have been properly notified of the hearing and given access to the bundles for the hearing. To the extent that

the requirements of section 12 (2) of the Human Rights Act 1989 apply I am satisfied that they too have been satisfied.

Legal principles

10. Counsel for the claimants took me to certain authorities concerning the test to be applied in a review hearing of this kind. In *High Speed Two (HS2) Ltd & Anor v Persons Unknown & Ors* [2024] EWHC 1277 (KB) Mr Justice Ritchie explained the position at paragraphs 32 to 33. That case concerned an interim injunction, but there is no reason why it should not apply equally to a final injunction.

11. Mr Justice Ritchie explained that on a review hearing the Court does not start with a blank slate. The judge who has previously granted the injunction has made findings justifying the injunction and it is not the task of the Court on review to query or undermine those. On the other hand the Court must read and assimilate the findings to understand the basis of the injunction. It is then necessary to determine on the evidence whether anything material has changed. If it has not and the risk still exists, the extension may be granted as long as proper procedural steps have been followed. If, on the other hand, there are material changes in the circumstances the Court is required to analyse them based on the evidence before it and in the full light of the history to determine anew whether to grant an injunction.

12. That approach was approved by Mr Justice Julian Knowles in *Thurrock Council & Anor v Adams & Ors* [2024] EWHC 2576 (KB) at paragraph 30.

13. In *Arla Foods Ltd & Anor v Persons Unknown & Ors* [2024] EWHC 1952 (Ch) Jonathan Hilliard KC, sitting as a Deputy Judge of the High Court, said at paragraph 128 that the review process would allow a continued assessment of whether circumstances have changed so as to make a continuation of the injunction appropriate. He observed that the review should be of whether the position had developed since the last review.

14. A review hearing is not, however, a mere rubber stamping exercise: see *Exolum Pipeline Systems Limited v HSE* [2024] EWHC 1015 (KB) paragraph 28.

15. Since the Gleeson order was made the Supreme Court has given judgment in *Wolverhampton City Council & Ors v London Gypsies and Travellers*.

16. I am satisfied that this has not affected the relevant legal tests in any material respects albeit the various important procedural and substantive safeguards for persons unknown have been carefully formulated. These have been summarised in recent protest cases including *Valero Energy Ltd & Ors v Persons Unknown & Ors* [2024] EWHC 134 (KB). In that case Mr Justice Ritchie listed 15 questions which the court might consider it appropriate to address. I shall return to these below.

Factual background

17. The Gleeson order concerned two sites. Site one is the West London Buncefield Oil Terminal located on the edge of Hemel Hempstead. The site is one of the largest oil

product storage depots in the UK with a capacity of about 65 million litres of fuel. The primary activities undertaken on the site are storage of aviation kerosene for onwards transmission to Heathrow and Gatwick airports, transfer of fuel products to neighbouring terminals, road loading of aviation kerosene and storage of interface material (a mixture of fuels) created as part of the pipeline operations.

18. The title interests regarding the site were set out by Mr Davis in his first statement. There is a private access track on land adjoining site one leading from the public highway (the site one access route). A plan for site one and the site one access route were annexed to the Gleeson order.

19. Site two is part of the Kingsbury Oil Terminal and located north east of the village of Kingsbury in Warwickshire. The primary activities undertaken on site two are the transfer of fuel to neighbouring terminals from pipeline systems and the storage of pipeline interface material, the transfer of fuel from neighbouring terminals to the pipeline system for onward transportation and acting as a central control centre for monitoring and control of the claimants pipeline and storage network.

20. The private accessway on land adjoining site two leading to the public highway is referred to as the site two access route. Again, the site and the site two access route are shown as annexes to the Gleeson order.

21. The immediate reason for the first interim injunctions granted by Mr Knox KC was widespread direct action that occurred against energy companies in April 2022. Mr Armstrong gave evidence about those protests in his first and second statements.

22. The two campaign groups which had organised that direct action were Extinction Rebellion and Just Stop Oil. The persons unknown, the first and second defendants in the Gleeson order, were defined in part by having a connection with or being affiliated to the Extinction Rebellion campaign or the Just Stop Oil campaign at the two sites.

23. The original evidence before Mr Knox KC showed that there had been direct action in respect of both site one and site two. In respect of site one there was evidence that the perimeter fence had been breached, and that persons unknown had been arrested within the site.

24. In respect of site one and site two there was also evidence of obstruction or interference with the site one access route and the site two access route. There was also evidence that there was a real and imminent risk of trespass to site two as well as the actual trespass that had taken place in respect of site one.

25. Mr Armstrong also gave detailed evidence of related incidents of direct action targeting other fuel terminals and associated energy infrastructure across the UK. He referred to the publicly available statements made by Extinction Rebellion about their determination to continue their campaigns. He also gave evidence about the significant risk of damage or injury to persons and property from any trespasses on the sites, including to the trespassers themselves. In that regard he explained that the sites are governed by extensive health and safety requirements and that there is potentially a very serious risk of injury in the event of trespass to the sites.

26. There have been numerous interim and final injunctions granted by the courts in relation to direct action threatened by environmental protest campaign groups, including those identified in the present orders. There have also been a number of subsequent reviews of those injunctions. Recent cases include *North Warwickshire BC v Persons Unknown* [2024] EWHC 2254 (KB), *Esso Petroleum Company Ltd v Persons Unknown* [2023] EWHC 1837 (KB) and a final injunction made in the *Valero Energy Ltd & Ors v Persons Unknown & Ors* case on 26 January 2024.

Assessment

27. The claimants rely on a number of factors to support their contention that there is a continuing threat of trespass and nuisance at the sites. They rely on the following in particular.

28. First, the direct action that occurred in and around the sites in April 2022. This is explained in the first and second statements of Mr Armstrong.

29. Second, since the grant of interim injunctions protecting the sites in April 2022 there have been further instances of direct action and protest in close proximity to site two. This was explained in Mr Armstrong's third statement.

30. Third, there has been continuing direct action carried out by organisations including Extinction Rebellion and Just Stop Oil aimed at the petroleum and gas sector more generally. Mr Armstrong addresses these at paragraphs 20 to 47. They include protests at the premises of various organisations including insurers of oil and gas infrastructure, at MPs' houses, and on a number of occasions, at prominent art galleries. It is clear from that evidence that Extinction Rebellion and Just Stop Oil are continuing their campaigns.

31. Fourth, the claimants rely on continuing statements, particularly in relation to Just Stop Oil, that they will be continuing their campaign of direct action.

32. Fifth, there has been a campaign, specifically, in relation to airports by Just Stop Oil in the summer of 2024 to seek to disrupt airports.

33. In a press release dated 3 March 2024 Just Stop Oil announced that in addition to disrupting high profile cultural events and continuing Stop Tory Oil campaign, it would commence a campaign of high level actions at sites of importance to the fossil fuel industry including airports. This led to many of the largest airports obtaining injunctions to prevent such direct action.

34. The claimants accept that the level of direct action has decreased in intensity since April 2022 and that the sites themselves have not been directly targeted. They submit that this is most likely because of the existence of the injunctions that have been granted by the courts. In this regard they rely on a tweet from JSO dated June 2023, and retweeted by Extinction Rebellion, which explained the consequences of breach of an injunction.

35. They also rely on a tweet dated 13 September 2023 where Just Stop Oil said, "in relation to protests in Portsmouth involving road blockages creates disruption is frustrating, but

we have no other choice. Fossil fuel companies have taken out private injunctions that make protests impossible at all refineries, oil depots and even petrol stations".

36. More generally, there has been a series of injunctions granted by the courts concerning, among other places, oil depots and terminals. It is a reasonable inference, say the claimants, that the very existence of the injunctions has reduced the overall level of direct action at or against such sites.

37. I am satisfied on the evidence, which has not been contradicted, that there exists a continued threat of trespass and nuisance at the two sites such that if the injunction were now to be discharged there would be a real and serious risk of such trespass and nuisance taking place. I also am satisfied by the claimants evidence that the harm that would occur if there were to be such trespass or nuisance is potentially very grave. The direct action in respect of the sites would pose significant health and safety risks, in particular, including personal injury to the defendants and others at the sites. It goes without saying that these can be very dangerous sites for those who have not received the appropriate training.

38. I should next consider whether there has been a material change since the Gleeson order. I have already set out the factual position. It appears to me that there has been no material change since the date of the Gleeson order and there continues to be a threat of direct action at the sites for the reasons already set out above.

39. Neither Just Stop Oil nor Extension Rebellion has disclaimed any intent to carry out direct action at the sites and they have not offered any assurances that they would not carry out such direct action: compare *Esso Petroleum Company Ltd v Persons Unknown* at paragraph 67.

40. As I have already explained, I draw the inference that it is the existence of a blanket of injunctions that has led to the falling off of direct action at sites similar to those in issue in the present case. As Mr Justice Linden stated in *Esso Petroleum Company Ltd v Persons Unknown* at paragraph 67:

> "It appears that the effect of the various injunctions which have been granted in this case and others has been to prevent or deter them from taking the steps prohibited by the orders of the court although, of course, not invariably so. If, therefore, an injunction is refused in the present case the overwhelming likelihood is that protests of the sort which were seen in 2021/2022 will resume".

The same reasoning applies here.

41. There have been a number of recent cases which have considered the provisions of the Public Order Act 2023 which created further criminal offences including locking on (section 1), tunnelling (section 3) and interference with key national infrastructure (section 7). That gives rise to the question whether the threat of direct action has been diminished.

42. In the present case the relevant provisions of the 2023 Act were already in force at the time of the Gleeson order. However, the Judge did not specifically consider the potential impact of the 2023 Act. There are a number of points to make about the Act. The maximum sentence for offences under sections 1, 2 or 7 is 12 months and in some cases is only a fine. The maximum penalty for contempt for breach of a civil injunction is two years. Moreover in a case of an injunction in favour of a party which seeks to protect its own private land from trespass and nuisance the question whether to seek to enforce an injunction through a committal proceedings is placed in the hands of the claimant. The procedure is reasonably speedy, and the claimant is not required to leave the matter to prosecuting authorities. The fact that the claimant has sought and obtained a specific order concerning a specific parcel of land may well lead to a greater deterrent effect than the general criminal law.

43. Moreover, as counsel for the claimants observed, where an injunction of this kind has been obtained and sufficiently notified to defendants, as has happened in this case, the defendants will have it drawn to their attention that carrying out the prohibited acts will themselves carry the risk of sanctions and as she said they will know that an order has been made in relation to the specific land in question. That may be thought to have, in practical terms, a more targeted and specific deterrent effect than the general criminal law even if the provisions of the general law are known to the relevant person - which cannot safely be assumed.

44. It is also worth noting that aggravated trespass was already a criminal offence at the time of the original direct action in this case in April 2022 and that did not deter the direct action.

45. In short, the Court must properly take into account the provisions of the Public Order Act when deciding whether there is a compelling justification for the injunction to protect the claimant's civil rights as the Court must assess the cogency of the evidence that there is a real and serious risk of tortious conduct and harm to the claimant. However, the existence of the Act is not a bar to the grant of injunctions in cases of this kind. In this regard I refer to the recent decisions in *Drax Power Limited v Persons Unknown* [2024] EWHC 2224 (KB), *North Warwickshire BC v Persons Unknown* [2024] EWHC 2254 (KB) and *Shell UK Limited v Persons Unknown* [2024] EWHC 1546 (KB). For the reasons already given I do not think it is a bar to the continuation of the Gleeson order.

46. I have referred already to the various factors drawn from *Wolverhampton City Council & Ors v London Gypsies and Travellers & Ors* by Mr Justice Ritchie in *Valero Energy Ltd & Ors v Persons Unknown & Ors*. These have been listed by him as 15 points. While it may not be necessary in all cases to go through them, they have been used in the present application as a useful set of criteria, and I shall consider them below.

47. First, a civil cause of action has been identified, namely trespass and nuisance.

48. Second, I am satisfied that the claimants have complied with their duty of full and frank disclosure.

49. Third, there was sufficient evidence to prove the claim to the summary judgment standard before Mr Gleeson. I have already addressed the evidence of a threat of further harm since the date of his order.

50. Fourth, I am satisfied that there was, and continues to be, no defence which has a realistic prospect of success.

51. Fifth, I am satisfied that there continues to be a compelling justification for the injunction to protect the claimants civil rights. I have already made findings about the threat and the potential for significant health and safety risks posed by trespassing on the sites. No justification has been advanced for the apprehended unlawful conduct.

52. Sixth, I am satisfied that the Court was not required to conduct the kind of balancing exercise required by articles 10 and 11 of the ECHR as those articles do not include or give the right to trespass on private property and, thereby, override the rights of private landowners.

53. Seventh, I am satisfied that damages would not have been an adequate remedy. Again, I refer to the health and safety risks posed by the defendants and their actions or over the amount of disruption likely to be caused and the fact that there were no named defendants to seek damages from shows that damages would not have been adequate. It seems to me that the threatened harm would have been grave and irreparable for these reasons. There are also obvious potential problems of identifying any defendants who may be able to meet a claim for damages.

54. Eighth, the persons unknown were clearly and plainly identified by reference to the conduct prohibited.

55. Ninth, the prohibition in the Gleeson order was set out in clear words and was not framed in legal technical terms. It does not prohibit any conduct which would be lawful viewed on its own.

56. Tenth, the prohibition in the Gleeson order mirrored the torts claimed in the claim form.

57. Eleventh, the prohibition in the Gleeson order was defined by clear geographic boundaries.

58. Twelfth, the Gleeson order granted a five year injunction with an annual review. This is similar to injunctions granted in other cases including *Valero Energy Ltd & Ors v Persons Unknown & Ors* and *Esso Petroleum Company Ltd v Breen & Anor.*

59. Thirteenth, persons unknown were notified of the claim documents, applications and orders through methods that have been sanctioned by the Court.

60. Fourteenth, the Gleeson order includes provision for any person to apply to set aside or vary the injunction on short notice.

61. Fifteenth, the Gleeson order will be reviewed annually.

62. In all these circumstances I am satisfied that it is appropriate for the injunction made in the Gleeson order to continue and the appropriate order is to make no order in relation to it.

63. The claimants have sought a minor amendment to the alternative service requirements that have been made in the earlier orders. The earlier orders included a number of methods of service or notification; 1) fixing documents and containers at a number of locations around the sites; 2) posting the documents on a website: 3) fixing large warning notices at locations around the sites and; 4) sending e-mails to certain e-mail addresses with information about where the documents could be found.

64. The claimants now seek to amend the first of these requirements so as to dispense with the requirement in the previous orders to provide copies of the relevant orders in clear transparent sealed containers at the site. They suggest instead that the claimants be permitted to affix copies of the Gleeson order at a minimum number of two prominent locations on the perimeter of each of the sites in close proximity to the large warning notices in clear envelopes. These will be attached to the fence or elsewhere where the large warning notices are affixed.

65. The evidence shows that under previous orders the documents were contained in transparent plastic containers and that these containers were affixed to perimeter fences at the sites. It does not seem to me that this was a particularly sensible way of drawing attention to the orders as a person would have had to see the box, to have read the notice in the lid of the box which explained that there were orders inside. That was fairly cumbersome and may not have been effective to notify potential trespassers.

66. It seems to me to make more sense that copies of the orders should be contained in see-through envelopes near the large warning notices. In the previous orders the requirement was that there be at least two transparent boxes. I am satisfied that it is appropriate to substitute for this the suggestion that the transparent envelopes be affixed at a minimum of two locations for each of the sites. For the avoidance of doubt I should make it clear that there is no requirement to include copies of any of the earlier orders so that this method of service or notification should apply only to the Gleeson order itself.

Conclusion

67. I am satisfied that the Gleeson order should continue.

End of judgment.

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Acolad UK Ltd hereby certify that the above is an accurate and complete record of the proceedings or part thereof

This transcript has been approved by the judge.

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

NOTE OF JUDGMENT OF MASTER KAYE ON 13 NOVEMBER 2025

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1. Judgment of Master Kaye at 11:26

1.1 Master Kaye confirmed that this was the second review haring of the injunction of Mr S Gleeson siting as a judge of the Chancery Division on 6 October 2023 and that the hearing was also to consider the Claimants' application dated 24 October 2025 to amend the claim to expand the description of the Defendants to encompass other environmental campaigns.

1.2 Master Kaye confirmed that the "Gleeson Order" provided for annual reviews, with this injunction first reviewed by Miles J in 2024. Interim injunctions made by Knox QC in April 2022, as reviewed by Mr J Rajah in April 2023.

1.3 Master Kaye confirmed that the Court have had the benefit of considering the skeleton argument of Mr Vanderman on behalf of the Claimants and considering the seventh witness statement of Mr Armstrong who is the director and general manager of BPA (British Pipeline Agency Limited).

1.4 Master Kaye also confirmed that the Court had the fifth witness statement of Antony Phillips, who is partner at Fieldfisher, addressing the various service requirements.

1.5 Master Kaye confirmed the following points:

(a) The original evidence in support of the injunction in 2022 and 2023 was primarily included in the first, second and third witness statement of Mr John Armstrong Mr Armstrong provided an updated sixth witness statement in 2024 for purpose of Miles J review;

(b) Mr Phillips has provided several witness statements prior his fifth witness statement, primarily focused on questions of service ;

(c) The requirements of service are set out in Gleeson Order and amended by Miles J when he considered changes arising from the Public Order Act 2023 but that the Court did not need to revise those, as explained in Miles J's judgment

1.6 Master Kaye confirmed that she was satisfied that Mr Phillips had served all the documents and the 2024 Order in accordance with the Gleeson Order as amended by the Miles J Order last year.

1.7 In keeping with the position since 2022, nobody has acknowledged these proceedings and no submission on the part of the Defendant had been made at this hearing or at all.

1.8 From personal experience, the injunction website is functional and working, and an issue in accessing the bundles in Court left Master Kaye to fall back on the use of the website, with direct experience that the website is running and effective. Master Kaye confirmed that there was no doubt that if first or second Defendant wishes to access documents or evidence, it is a simple method of doing do and an effective method.

1.9 *As Wolverhampton City Council and others v London Gypsies and Travellers and others* in 2023 has made clear, it is not service that is taking place, rather it is service, dealt with by Miles J for present purposes, which is used as a colloquial term for notification that has taken place.

1.10 In 2022 a large number of injunctions obtained such as for the Claimants in this case and subsequently by airports and in the last two years, and recently there have been a series of hearings that are either first or second reviews of those injunctions. As a consequence, the legal principles to be considered when considering the review have bene reestablished by a series of Judges.

1.11 Master Kaye confirmed that she intended to refer primarily to a second review similar to this in which Sweeting J encapsulated the matters, confirming that it this was far from the only case to consider these issues but it is not necessary to look at all of the authorities.

1.12 Sweeting J encapsulates the jurisdiction of a review hearing and in particular refers to paragraph 225 of *Wolverhampton City Council and others v London Gypsies and Travellers and others* where he sets out the Court's observations on the continued purpose of the hearing.

1.13 Master Kaye confirmed that those paragraphs referred to by Sweating J encapsulated the jurisdiction for considering this matter today.

1.14 Mr Vanderman in his skeleton rightly refers to the fact that in *Exolum Pipelines* the Court made it clear that a review hearing is not a rubber-stamping exercise but goes on to explain that by refence

to decision of HHJ Emma Kelly in the *North Warwickshire BC* review hearing, the proper focus of the review was to consider whether there has been any material change. She explained that material change are factual developments since the date the order was granted.

1.15 Factual background to this claim and this injunction review hearing has been set out in the earlier decision, and Master Kaye did not intend to repeat the wealth of evidence placed before the Court. In summary, the claim concerns two sites. Site 1 is said to be one of largest oil product storage depots in UK. Explained in detail in earlier evidence.

1.16 Master Kaye summarised that there was widespread direction action against energy companies in April 2022, included specially a targeting of Site 1 and a belief at the time that there was a real risk of action at Site 2, as set out in earlier evidence. Evidence of direction action across the UK and statements of Extinction Rebellion as one group are also set out in the evidence.

1.17 Mr Armstrong gave detailed evidence about those ongoing campaigns his sixth witness statement last year and explained an updated position for the purposes of review. As a consequence of that direction action in 2022, there were numerous judgements against actions of environmental campaigns including those in this case.

1.18 Mr Vanderman had not able to find any case where injunction had had not continued. Mr Armstrong set out a number of injunctions, how long they last and when the most recent review took place.

1.19 The majority of injunctions obtained in/abut 2022/23 were made for period of 5 years to 2028/29, each subject to one or two reviews and none of yet having not been continued. Following all of injunctions in relation to Shell, Esso, pipelines, a targeting of airports and that resulted in injunctions being made in similar terms in relation to similar groups for all major UK airports. Those injunctions also granted until 2029 but some others year by year basis. None of those have been removed on review.

1.20 As a consequence, ongoing activity of those groups, such as JSO, have decreased in intensity and the sites to which these injunctions relate have not since been directly targeted. The Claimants submit that this most likely due to the existence of the injunction granted by the Courts and there is some evidence to support that as explained in Mr Armstrong's seventh witness statement.

1.21 In particular, he explains that there appears to have been a change in approach, JSO issued a statement in or about March 2025 when it announced plans to end and re-strategise. A number of Judges have been referred to that statement and the same evidence as Master Kaye was taken to. Even when making that statement on JSO's own website, they did at the same time hint at further protest and disruption and that they were not finished yet.

1.22 In addition, the front page of the JSO website talks about "nothing short of…mess…just getting started" and includes talk about continuing action and applying nonviolent pressure until they force change and at the website's FAQ page, they talk about mass protest and disruption and explain to readers of website that they might be arrested but they have a moral duty to act. All of this is against a background to say that they were ending some of their disruptive behaviours. It is therefore difficult to accept at face value that they intend to do so.

1.23 Mr Armstrong refers to a blog post by Mel Carrington, spokesperson for JSO, shortly after a statement that they were going to wind down and end disruptive protest, which states that JSO have shown that resistance works, ordinary people can bring about change by putting body on line and risk arrest.

1.24 Master Kaye confirmed that it seemed to be that, on the evidence, JSO are regrouping rather than stopping. Mr Armstrong set out the further activity of JSO where they have made similar comments, and of particular importance of this case is the police's view and the GB news report.

1.25 The report by GB News in May 2025, a couple of months after the original announcement, in which they produced a transcript of the meeting in which JSO had meetings which make it very clear that there was a consensus that the group should continue with civil disobedience as it was the most effective thing to do. In May 2025, JSO circulated a link to the GB News story which says GB News are right for once that we (JSO) are plotting a very big comeback, again inconsistent with earlier statement that they were winding down.

1.26 Further evidence which is said to support the continuing need or these injunctions was the police's response to these issues. Sussex Police acknowledged that JSO and environmental protests regarding anti-aviation had returned to dormant. However, it was recognised that the injunctions were having some effect. In particular, the Met police said on 1 May 2025, in relation to Heathrow airport's injunction, *"I know it is mentioned…yesterday and builds on…open up to further protests…cannot be ruled out so maintain git would be very much recommended."*

1.27 Evidence in Mr Armstrong's seventh witness statement in relation to JSO suggests that a real risk remains but his evidence goes further. Master Kaye dealt with that at this point, even though it affects the Claimants' application.

1.28 Mr Armstrong's evidence includes evidence of JSO working with other groups rather than just itself, these are new emerging groups and/or groups with which JSO seem to be working. Four particular ones identified by Mr Armstrong are Shut the System (who in January 2025, severed fibre option cables).

1.29 Particular concern is that there seems to have engaged with various activities including summer camp to train Youth Demand members run jointly with JSO seemly in how they can in non-violent protest activities. Article in Times in June 2025 referred to Youth Demand as latest campaign taking up mantle of disruption form JSO. Referred to fact that whereas JSO supposedly disbanded playing central role in recruiting members to Youth Demand and events for Youth Demand advertised using JSO logo. Article refers to quote, “This is the inhale before we breathe out…”

1.30 The above activity was referred to whilst JSO was supposedly disbanded, despite playing a central role in recruiting new members to Youth Demand and events to Youth Demand had bene advertised to the JSO logo – there appear to be a series of training camp in June 2025 and a training camp in august 2025 to training and according to the article civil camp fires.

1.31 Master Kaye noted that the work to build a generation of revolutionary organisers does not suggest that nothing more than a pause and if not for the injunction, there would likely be more activity.

1.32 Master Kaye confirmed that she was satisfied that there had been response to continued threat of direct action such that if injunction discharged serious risk of trespass and nuisance taking place. Even JSO recognise that injunctions stopping it form taking action.

1.33 The Claimants' evidence is that harm that would occur – trespass and nuisance at these Sites would be catastrophic, both to those trespassing, those on the Site and the wider public. These are oil pipeline sites dealing with flammable and dangerous oil without training. Disruption to these sites would cause disruption to major airports and the disruption to the wider public very significant need.

1.34 As this is a review, the next question is whether there has been a material change since Gleeson Order and Miles J Order. There remains a real risk and whilst direct risk has diminished, it appeared to Master Kaye that no material change since the Gleeson Order or the Miles J Order and continues to be a real threat of direct action at the sites for those reasons.

1.35 Linden J identified earlier in the original *Esso* decision that a significant fact to be taken into account is whether there had been any disclamation to cease activity in relation to those sites. There is no

evidence to suggest that in respect of the Sites and no assurances had been offered, with the evidence pointing in a different direction.

1.36 Mr Vanderman identified that he had an obligation to raise any matters of full and frank disclosure. In doing so, he pointed to the fact that the Sussex Police had referred to the fact that JSO were dormant but countered that by the Met Police view that injunctions remained useful.

1.37 In terms of changes in law, Mr Vanderman identified Nicklin J decision in *MBR Acres.* Judge suggested no longer necessary or appropriate to constrain categories of D and similar approach adopted in *Cambridge University*. Those decisions were since considered by other Judges who do not take the same view. Master Kaye confirmed it was sufficient for these purposes to refer to Sweeting J judgment in relation to review hearing in *Esso* where at paragraph 28 he said "I find no compelling reason to amend description of Defendants on review". Master Kaye noted that she was in exactly the same position in this case and the description of Defendants in this case is sufficient and sensible. Master Kaye did not agree with Nicklin J that broader category of Defendant is helpful.

1.38 Master Kaye was persuaded that Nicklin J's decision requires any change in this stage to description of Defendants.

2. Claimants' Application

2.1 Turning to the Claimants' application, it clear from the evidence of Mr Armstrong there are other groups such as Shut the System, Youth Demand, Citizens Arrest Network, Fossil Free London all of whom are undertaking activities in the same area as JSO and XR. The Claimants are therefore concerned that JSO is either involved with these groups and / or merging with these groups or that these groups are emerging in their own right to undertake similar actives to JSO and XR.

2.2 The Claimants' therefore seek an order than the description of Defendants be expanded to include other environmental campaign groups.

2.3 The amendment on its face is small, to include in the definition of "or other environmental campaign". As Master Kaye have alluded to, this not the first time this application has been made and it has been allowed by other Judges and on review. Sweeting J considered that the same organisations, supporters and protesters demonstrated on the evidence and required an amendment as sought in this case not to thwart the purpose of the injunction. A similar application was granted in *Esso* and any concern with the widening of the injunction is tempered by the fact that the conduct is unlawful and convention rights are qualified so that the balancing exercise is in favour of restraint.

2.4 The Claimants here urge the same course to be taken. They say on the evidence that there is evidence of a real risk that JSO membership is evolving into different organisations tending to carry out similar direct action. They point to various articles and comments in the press, some of which Master Kaye was been referred to. It seemed, to Master Kaye, that the Court should be cautious to amend, especially to such broad description as any other environmental campaign but recognise the risk of other groups taking on the mantel of JSO and Youth Demand are being trained up to take on the tasks of JSO.

2.5 Master Kaye suggested that something was afoot but what that was is unclear. There is always risk that too broad definition risks weakening carefully crafted injunction itself and expanding too wide to cover too many intentions behind it. However, like Sweeting J, it seems that description of other environmental campaigns whilst preferable to have something with more clarity aimed at groups intended to conduct unlawful activity and where ECHR rights are qualified, there is a difficulty with being more prescriptive is that more groups may grow.

2.6 On balance this is the case where the permission sought should be granted given the clear evidence that JSO is evolving and other groups are volving to undertake same work. However, that is certainly a matter that should be kept under review given the residual concerns about such a broad category. One way of dealing with that is to deal with how notice should be given.

2.7 At present, the draft order will have all the provisions of Gleeson Order in terms of service. Those include having very large version of various notices at site and copies of order as well as by the website. Email addresses are those relating to JSO identified in 2022 and 2023.

2.8 However, a balancing exercise is to be carried out and it is not immediately obvious whether any of four identified groups have email addresses or ways of notifying them. As against that, there is a danger that notifying them will put them on notice that there is a site they should go and see. On balance, further steps should be taken ensure notification is given to at least four campaigns that the Claimants are aware of.

2.9 At the review hearing next year, consideration will given as to whether any further refinement should be made to Order or notification provisions either to address scope of the expanded order to other campaigns or to notification provisions to try to ensure that anyone who is planning activity of type injunction intended to stop notified they would be in difficulties in doing so.

2.10 Master Kaye therefore continued the injunction but also granted the amendments sought by the Claimants subject to some change to notification provisions if appropriate emails could be found.

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: **HB Tab 31: 279-282**

   (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. **HB Tab 31: 281**

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 **HB Tab 31: 281** **EB6 Tab 53-66: 160 - 224**

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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. **HB Tab 31: 282**

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. **HB Tab 31: 280**

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. **HB Tab 31: 280 - 281**

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). **HB Tab 41: 508**

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

PLACEHOLDER