

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

FOR USE AT HEARING OF APPLICATION FOR SUMMARY JUDGMENT

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(1) UNITED KINGDOM OIL PIPELINES LIMITED

(2) WEST LONDON PIPELINE AND STORAGE LIMITED

Claimants / Applicants

and

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

First Defendant/Respondent

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

Second Defendant/Respondent

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189.	Article by Just Stop Oil: "Just Stop Oil supporters disrupt England cricket team"	1 June 2023	712-714
190.	Article by Just Stop Oil: "Just Stop Oil supporters march as Academy Award winning director pledges to TRIPLE donations"	2 June 2023	715-717
191.	Article by Essex Live: "Just Stop Oil protestors block A12 with 'slow walking protest' near Ilford"	5 June 2023	718-719
192.	Article by Just Stop Oil: "Two arrests as Just Stop Oil supporters disrupt traffic around London"	5 June 2023	720-723
193.	Article by Just Stop Oil: "Eight Just Stop Oil supporters arrested for demanding UK government take basic steps to protect the public"	7 June 2023	724-726
194.	Article by Just Stop Oil: "Dale Vince and George Monbiot march with Just Stop Oil"	8 June 2023	727-730
195.	Tweet from Just Stop Oil: "Do you know what happens if you protest outside oil refineries now?"	9 June 2023	731
196.	Tweet from Just Stop Oil: "BREAKING: 36 people are taking action today, some with unprecedented bail conditions that ban protesting in public."	9 June 2023	732
197.	Article by road.cc: "Just Stop Oil begin slow cycling protests"	9 June 2023	733-735
198.	Article by ITV: "Extinction Rebellion protestors glue themselves to research centre supported by Cambridge University"	9 June 2023	736-738
199.	Article by The Chiswick Calendar: "Just Stop Oil target Chiswick Roundabout in slow march protest"	12 June 2023	739-744
200.	Article by the Guardian: "Met says Just Stop Oil protests have cost it more than £4.5m in six weeks"	12 June 2023	745-746
201.	Article by Just Stop Oil: "Just Stop Oil supporters refuse to stand by as climate crisis escalates"	12 June 2023	747-750

202.	Article by Just Stop Oil: "This government is breaking the law. We are trying to uphold the law'- Just Stop Oil supporters march"	13 June 2023	751-753
203.	Article by Mail Online UK: "Just Stop Oil mob take their slow marching to Westminster Bridge as they protest in TEN different areas of London – just hours after new measures giving police wider powers to tackle road-blockers"	14 June 2023	754-758
204.	Article by Just Stop Oil: "Nine arrests as Just Stop Oil supporters ignore illegitimate new law"	15 June 2023	759-762
205.	Tweet from Just Stop Oil: "3 Just Stop Oil supporters Defy Authoritarian Bail Conditions"	15 June 2023	763
206.	Article by the Guardian: "Just Stop Oil protestors interrupt opera at Glyndebourne festival"	15 June 2023	764-765
207.	Tweets from Just Stop Oil	15 June 2023 - 16 June 2023	766-767
208.	Article by Mail Online: "'It's getting boring now!': Just Stop Oil eco-clowns cause more misery in new London slow-march – before getting hauled off road by cops in 20 minutes"	16 June 2023	768-773
209.	Article by Just Stop Oil: "Just Stop Oil supporters slow march again to resist new oil and gas"	20 June 2023	774-776
210.	Article by Just Stop Oil: "Just Stop Oil supporters march as government paves way for 19th Century energy policies"	21 June 2023	777-780
211.	Article by Just Stop Oil: "Just Stop Oil slow marches as world sprints past ecological tipping points"	23 June 2023	781-783
212.	Article by Just Stop Oil: "Students demand action to safeguard their future"	26 June 2023	784-786
213.	Article by Mail Online: "'Get out the way!' Moment furious cyclist drags Just Stop Oil activists out of the road to let gridlocked traffic pass - after motorcyclist ploughs through banner during chaotic slow march protests"	26 June 2023	787-790

214.	Article by The Telegraph: "Just Stop Oil called 'out of control' after protest near major hospital"	26 June 2023	791-793
215.	Article by The Daily Telegraph: "Just Stop Oil blocks hospital road with demonstration"	27 June 2023	794-795
216.	Article by Mail Online: "Just Stop Oil launch disruptive slow march across London Bridge after eco-zealots sprayed orange and black paint over energy firm's Canary Wharf office"	27 June 2023	796-801
217.	Article by the Evening Standard: "Just Stop Oil sprays orange and black paint at TotalEnergies headquarters in Canary Wharf"	27 June 2023	802-806
218.	Article by BBC Sport: "Ashes: Just Stop Oil protestors briefly disrupt opening morning of England v Australia Test at Lord's"	28 June 2023	807-809
219.	Article by BBC News: "Just Stop Oil: Three charged after activists disrupt Ashes Test at Lord's"	28 June 2023	810-811
220.	Article by Just Stop Oil: "It's 'just not cricket' to licence new oil, gas and coal whilst the climate crisis knocks us for six – Just Stop Oil disrupt the Ashes"	28 June 2023	812-815
221.	Article by Just Stop Oil: "'Politicians have failed for 50 years' - Just Stop Oil students march after damning report on government inaction"	29 June 2023	816-819
222.	Article by Just Stop Oil: "Another win for Just Stop Oil as Police fail to arrest student bail breakers"	30 June 2023	820-823
223.	Article by Mail Online: "Five Just Stop Oil activists who halted annual London Pride parade are charged with public nuisance offences"	2 July 2023	824-826
224.	Article by euronews: "Just Stop Oil protesters disrupt London Pride over 'high-polluting' sponsors"	2 July 2023	827
225.	Article by BBC News: "London Pride: Five Just Stop Oil protesters charged"	2 July 2023	828-829
226.	Article by Just Stop Oil: "'I'm taking action for all children everywhere' – Just Stop Oil begin"	3 July 2023	830-834

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227.	Article by the Insider: "Activists protest outside Wood headquarters"	3 July 2023	835-837
228.	Article by Extinction Rebellion: "Wood Group shows 'utter contempt' for UK taxpayer, say activists, as they spray offices with fake oil"	3 July 2023	838-841
229.	Article by Just Stop Oil: "Just Stop Oil slow march from the hottest June ever recorded into the hottest July ever predicted"	4 July 2023	842-844
230.	Article by ITV: "Wimbledon match disrupted as Just Stop Oil protesters invade court during Dimitrov v Shimabukuro"	5 July 2023	845-848
231.	Article by the Metro: "Wimbledon hit by Just Stop Oil as protesters invade court to scatter orange confetti and puzzle pieces"	5 July 2023	849-850
232.	Article by Just Stop Oil: "Just Stop Oil supporters continue marching after it's revealed that Sunak plans to ditch climate pledges"	6 July 2023	851-854
233.	Article by Just Stop Oil: "Just Stop Oil supporters continue their disruption after the hottest week ever recorded"	7 July 2023	855-857
234.	Article by iNews: "Just Stop Oil vows to keep disrupting major events despite backlash after Wimbledon chaos"	9 July 2023	858-861
235.	Article by Just Stop Oil: "Five arrested as Just Stop Oil supporters begin 12 th week of continuous civil resistance"	10 July 2023	862-865
236.	Article by the Metropolitan Police: "Four people charged following Just Stop Oil protests"	11 July 2023	866-868
237.	Article by Just Stop Oil: "Just Stop Oil mothers march in Hamleys Toy Store"	12 July 2023	869-872
238.	Article by Just Stop Oil: "Six arrested as Just Stop Oil dads march through Selfridges"	13 July 2023	873-876
239.	Article by the Express: "Just Stop Oil abandon actual roads to pose next to stationary Selfridges DeLorean"	13 July 2023	877-881

240.	Article by Just Stop Oil: "Just Stop Oil march through John Lewis"	14 July 2023	882-885
241.	Article by the Evening Standard: "Just Stop Oil protesters storm stage on first night of the Proms at the Royal Albert Hall"	14 July 2023	886-888
242.	Article by Sky News: "Just Stop Oil protesters interrupt Proms concert and live broadcast of TV comedy show The Last Leg"	15 July 2023	889-892
243.	Article by Sky News: "Just Stop Oil protesters arrested after targeting 14 London locations"	17 July 2023	893-896
244.	Article by Just Stop Oil: "Twenty one Just Stop Oil supporters arrested for marching as thirteenth week of disruption begins"	17 July 2023	897-900
245.	Article by the Stroud Times: "Stroud parents occupy Hamleys and Selfridges in Just Stop Oil protest"	18 July 2023	901-904
246.	Article by the Metro: "Just Stop Oil protester who disrupted snooker championship ruins own graduation"	18 July 2023	905-910
247.	Article by the Eastern Daily Press: "Norwich student charged for Just Stop Oil graduation protest"	18 July 2023	911-913
248.	Article by Just Stop Oil: "Just Stop Oil marcher assaulted as wildfires rage across the globe"	19 July 2023	914-916
249.	Article by Sky News: "Just Stop Oil: Activists 'committed criminal damage' by spraying government building, Grant Shapps says"	19 July 2023	917-921
250.	Tweet from Just Stop Oil: "Breaking: Just Stop Oil Paint the Department for Energy Security and Net Zero"	19 July 2023	922
251.	Article by Just Stop Oil: "Just Stop Oil marchers kettled by counter-protesters as scientists warn 'we are damned fools' for not acting on crisis"	20 July 2023	923-925
252.	Article by Open Democracy: "Just Stop Oil targets think tank over role in protest crackdown"	20 July 2023	926-928

253.	Article by Just Stop Oil: "Criminal climate think tank Policy Exchange painted by Just Stop Oil"	20 July 2023	929-931
254.	Article by the Mail Online: "Four activists arrested as Just Stop Oil target the Open Championship...as nine police officers march protesters away in latest attempt to disrupt British summer of sport"	21 July 2023	932-934
255.	Article by LBC: "Just Stop Oil strike at The Open as US golfer cheered for helping remove activist"	21 July 2023	935-938
256.	Article by ESPN: "Just Stop Oil protesters attempt to disrupt Open Championship"	21 July 2023	939-941
257.	Article by the Cambridge Independent: "'We will not die quietly' say Just Stop Oil Cambridge protesters after North Sea drilling go-ahead"	1 August 2023	942-944
258.	Tweet from Just Stop Oil: "And that's why you get your offices painted: for taking fossil fuel money to lobby genocidal policies"	5 August 2023	945
259.	Article by LBC: "'The Prem's our Holy Grail': Just Stop Oil plan to disrupt a Premier League game every weekend this season"	7 August 2023	946-949
260.	Article by Extinction Rebellion: "Update to the movement, summer 2023"	11 August 2023	950-953
261.	Facebook post from Reigate and Banstead Beat (Surrey Police): "Police in attendance at the AIG Women's Open golf championship this evening (Sunday 13 August) were made aware of a disturbance on the 17 th green at 6.15pm"	13 August 2023	954
262.	Article by Golf Magic: "Asthma sufferer Charley Hull labels AIG Women's Open protesters 'idiots'"	15 August 2023	955-960
263.	Article by Somerset Live: "Just Stop Oil protesters cause disruption in Somerset"	18 August 2023	961-963
264.	Article by Just Stop Oil: "Exeter slow march rallies local opposition to new oil and gas licences"	19 August 2023	964-967
265.	Article by Bright Green: "Money Rebellion protesters disrupt AIG Women's Open"	20 August 2023	968-969

266.	Article by the Express: "Fury as Just Stop Oil eco mob is recruiting university professors for campus campaign"	20 August 2023	970-975
267.	Article by the Daily Mail: "Now Just Stop Oil hit the north: Eco-clowns launch slow walk through the streets of Leeds"	26 August 2023	976-981
268.	Article by Bournemouth Daily Echo: "Dorset Extinction Rebellion activists protest outside oil company's London HQ"	2 September 2023	982-984
269.	Article by the Express: "Just Stop Oil recruiting scores of students so next protests will be bigger than ever"	4 September 2023	985-990
270.	Article by Extinction Rebellion: "What Next?"	5 September 2023	991-993
271.	Press Release from Just Stop Oil: "An Open letter to the UK Police Unions"	13 September 2023	994-998
272.	Article by the Portsmouth News: "Just Stop Oil: Protesters attacked and hit by cars during Portsmouth 'slow march' demonstration"	15 September 2023	999-1003
273.	Article by the Express: "Extinction Rebellion eco-mob douses Labour Party's HQ in fake oil and scales building"	18 September 2023	1004-1008
274.	Article by Extinction Rebellion: "Extinction Rebellion targets Labour Party HQ to demand radical manifesto on climate breakdown"	18 September 2023	1009-1011
275.	Press release from Just Stop Oil: "Open Letter to all University Vice Chancellors in the UK"	18 September 2023	1012-1013
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279.	North Warwickshire Borough Council statement	15 March 2023	112-113

280.	2023 NWBC Order	8 August 2023	114-123
281.	Article by North Warwickshire Borough Council: "Final Hearing of the Council's Application for an Injunction to prevent disruption being caused by those protesting at Kingsbury Oil Terminal"	10 August 2023	124-125
E. Documents related to service			
282.	Email from Claimants' solicitors to xr-legal@riseup.net timed 06:27am	8 April 2022	127
283.	Email from Claimants' solicitors to juststopoil@protonmail.co.uk timed 6:28am	8 April 2022	128
284.	Email from Claimants' solicitors to xr-legal@riseup.net timed 09:24am	8 April 2022	129
285.	Email from Claimants' solicitors to xr-legal@riseup.net timed 6:27am	8 April 2022	129-130
286.	Email from Claimants' solicitors to juststopoil@protonmail.co.uk timed 09:25am	8 April 2022	131
287.	Email from Claimants' solicitors to juststopoil@protonmail.co.uk timed 6:28am	8 April 2022	131-132
288.	Email from postmaster@fieldfisher.com to Claimants' solicitors timed 6.36am	12 April 2022	133
289.	Images of the container on the perimeter of Site 1 containing the sealed Order	13 April 2022	134-139
290.	Images of the container on the perimeter of Site 2 containing the sealed Order	13 April 2022	140
291.	Screenshot of web link https://ukop.azurewebsites.net hosting the Order and Court Documents	13 April 2022	141
292.	Email from Claimants' solicitors to xr-legal@riseup.net timed 10.54am	13 April 2022	142
293.	Email from Claimants' solicitors to juststopoil@protonmail.co.uk , juststopoil@protonmail.com and juststopoil@protonmail.com timed 10.58am	13 April 2022	143
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298.	Images of the container on the perimeter of Site 1 containing the Court Documents	6 April 2023	184-187
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300.	Email from Claimants' solicitors to xr-legal@riseup.net timed 14:08pm	6 April 2023	194
301.	Email from Claimants' solicitors to juststopoil@protonmail.co.uk , juststopoilpress@protonmail.com and juststopoil@protonmail.com timed 14:09pm	6 April 2023	195
302.	Email from Claimants' solicitors' postmaster to Claimants' solicitors timed 10:20am	10 April 2023	196
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304.	Screenshots of Just Stop Oil's website	12 April 2023	198-199
305.	Screenshot of web link https://ukop.azurewebsites.net	13 April 2023	200
306.	Email from Claimant's solicitors to xr-legal@riseup.net timed 15:39pm	11 July 2023	201
307.	Email from xr-legal@riseup.net to Claimant's solicitors timed 15:39pm	11 July 2023	202
308.	Email from Claimant's solicitors to juststopoil@protonmail.co.uk , juststopoilpress@protonmail.com and juststopoil@protonmail.com timed 15:38pm	11 July 2023	203
309.	Screenshot of Just Stop Oil's website	13 July 2023	204-205
310.	Email from Claimant's solicitors to xr-legal@riseup.net timed 16:35pm	18 July 2023	206
311.	Email from xr-legal@riseup.net to Claimant's solicitors timed 16:36pm	18 July 2023	207

312.	Email from Claimants' solicitors to juststopoil@protonmail.co.uk , juststopoilpress@protonmail.com and juststopoil@protonmail.com timed 16:35pm	18 July 2023	208
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D. Orders made in and documents relating to other injunction proceedings

IN THE HIGH COURT OF JUSTICE.

CLAIM No: QB-2022-000904

QUEENS BENCH DIVISION

Before Mr Justice Bennathan

On: 11 April 2022

BETWEEN

**(1) VALERO ENERGY LIMITED
(2) VALERO LOGISTICS UK LIMITED
(3) VALERO PEMBROKESHIRE OIL TERMINAL LIMITED**



-and-

QB-2022-000904

**(1) PERSONS UNKNOWN ENTERING AND REMAINING WITHOUT THE
CONSENT OF THE CLAIMANT(S) ON THE LAND KNOWN INFORMALLY
AS PEMBROKE REFINERY, MANCHESTER TERMINAL, KINGSBURY
TERMINAL, PLYMOUTH TERMINAL, CARDIFF TERMINAL,
PEMBROKESHIRE TERMINAL AND AVONMOUTH TERMINAL AND MORE
PARTICULARLY DESCRIBED IN THE ORDER OF 11 APRIL 2022 AS THE
CLAIMANTS' LAND**

**(2) PERSONS UNKNOWN CAUSING BLOCKADES, OBSTRUCTIONS AND/OR
PREVENT THE FREE FLOW OF TRAFFIC AND INTERFERE WITH THE
PASSAGE BY THE CLAIMANTS AND THEIR AGENTS, SERVANTS,
EMPLOYEES, LICENSEES, INVITEES WITH OR WITHOUT VEHICLES AND
EQUIPMENT TO, FROM, OVER AND ACROSS THE ROADS IN THE
VICINITY OF THE LAND KNOWN INFORMALLY AS PEMBROKE
REFINERY, MANCHESTER TERMINAL, KINGSBURY TERMINAL,
PLYMOUTH TERMINAL, CARDIFF TERMINAL, PEMBROKESHIRE
TERMINAL AND AVONMOUTH TERMINAL IN CONNECTION WITH
ENVIRONMENTAL PROTESTS BY THE JUST STOP OIL AND/OR
EXTINCTION REBELLION AND/OR INSULATE BRITAIN AND/OR YOUTH
CLIMATE SWARM (ALSO KNOWN AS YOUTH SWARM) MOVEMENTS**

Defendants

ORDER

PENAL NOTICE

IF YOU THE WITHIN NAMED DEFENDANTS OR ANY OF YOU DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH 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 TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD 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 the acts set out in this Order. You should read it very carefully. You are advised to consult a solicitor as soon as possible. You have the right to ask the Court to vary or discharge this Order.

UPON the Claimants' Application by Application Notice for a further anticipatory injunction dated 6 April 2022 (the "Application")

AND UPON READING the documents set out in the First Schedule to this Order

AND UPON hearing Toby Watkin QC for the Claimants

AND UPON the Claimants giving the undertakings set out in the Second Schedule to this Order

AND UPON the Claimants confirming (for the avoidance of doubt) that this Order is not intended to prohibit lawful protest in the vicinity of the Claimants' Land which does not breach the terms of this Order, nor does the order seek to prevent lawful use of the Access Roads by any person.

IT IS ORDERED THAT:

Order of 21 March 2022

1. The interim injunctions set out within paragraph 2 of the Order of 21 March 2022 is discharged and replaced by the interim injunctions contained in paragraph 3 of this Order.

Definitions

2. For the purposes of this Order,

2.1 the “**Claimants’ Land**” means all of the property referred to and defined in paragraph 3.1 hereof;

2.2 “**Site**” means the Claimants’ site at any location, forming part of the Claimants’ Land and identified in paragraph 3.1 of this Order, and which is either (i) from time to time wholly or substantially enclosed or bounded by walls, gates, fences, barriers, hedges, bodies of water or other man-made or natural boundary features or (ii) forms private roads and car parks outside of such enclosure or boundary feature;

2.3 the “**Access Roads**” means those parts of the roads in the vicinity of the Claimants’ Land which provide access to each of the sites forming parts of the Claimants’ Land, the location and extent of which are more particularly shown for identification purposes coloured variously red, yellow and blue on the plans annexed hereto at Annex I to this Order.

Injunction

3. With immediate effect until 23:59 on Friday 21 January 2023, unless varied, discharged or extended by further order, the Defendants and each of them are forbidden from doing the following:

3.1 Entering or remaining upon any part of the following property without the Claimants’ permission:

- a) the First Claimant’s Site informally known as ‘Pembroke Refinery’ situated at Angle, Pembroke SA71 5SJ, the general location and extent of which is shown outlined in red on the plan exhibited hereto in Annex A (“**Pembroke Oil Refinery**”);
- b) the First Claimant’s Site, informally known as ‘Tanker berthing jetties at Pembroke Refinery’ situated at Angle, Pembroke SA71 5SJ, the general location and extent of which is shown outlined in blue on the exhibited hereto in Annex B (“**Pembroke Oil Refinery Jetties**”);

- c) the Second Claimant's Site, informally known as 'Manchester Terminal' situated at Trafford Wharf Road, Trafford, the general location and extent of which is shown outlined in red on the exhibited hereto in Annex C (the "**Manchester Oil Terminal**");
- d) the Second Claimant's Site, informally known as 'Kingsbury Terminal' at Plot B Trinity Road, Kingsbury, Tamworth, the general location and extent of which is shown outlined in red on the exhibited hereto in Annex D (the "**Kingsbury Oil Terminal**");
- e) the Second Claimant's Site informally known 'Plymouth Terminal' at Oakfield Terrace Road, Cattedown, Plymouth, the general location and extent of which is shown outlined in red on the exhibited hereto in Annex E (the "**Plymouth Oil Terminal**");
- f) the Second Claimant's Site informally known as 'Cardiff Terminal' at Valero Refinery, Roath Dock, Rover Way, Cardiff CF10 4US, the general location and extent of which is shown outlined in red on the exhibited hereto in Annex F (the "**Cardiff Oil Terminal**");
- g) the Second Claimant's Site informally known as 'Avonmouth Terminal', Avonmouth Dock, Bristol, the general location and extent of which is shown outlined in red on the exhibited hereto in Annex G (the "**Avonmouth Oil Terminal**"); and
- h) the Third Claimant's Site informally known as 'Valero Pembroke Oil Terminal', Waterston, Milford Haven, the general location and extent of which is shown outlined in red on the exhibited hereto in Annex H (the "**Pembrokeshire Terminal**");

3.2 Blocking any entranceway to the Claimants' Land;

- 3.3 Damaging any part of the Claimants' Land;
- 3.4 Affixing themselves to any other person or object on or otherwise to the Claimants' Land or the aforesaid parts of the Access Roads;
- 3.5 Erecting any structure on the Claimants' Land or on the aforesaid parts of the Access Roads;
- 3.6 Abandoning any vehicle or item on the aforesaid parts of the Access Roads;
- 3.7 Tunnelling under or using or occupying existing tunnels under the aforesaid parts of the Access Roads with the intention of preventing their use;
- 3.8 Causing, assisting or encouraging any other person to do any act prohibited by paragraphs 3.1 to 3. 3.7 above;

Amendment of Claim Form

- 4. Permission is granted to the Claimants to amend the descriptions of the Defendants upon the Claim Form to the descriptions which are set out in the Third Schedule to this Order.

Disclosure against non-party

- 5. Pursuant to CPR 31.17, the Chief Constables listed in the Fourth Schedule shall as soon as reasonably practicable upon request by the Claimants give disclosure by provision of copy of documents in the following classes to the Claimants:
 - 5.1 documents identifying the names and addresses of any person who has been arrested or is arrested by one of their officers in the course of, or as a result of the protests which are the subject of these proceedings at the Claimants' Land or on the Access Roads, in relation to conduct which may constitute a possible breach of the injunctions granted in these proceedings;
 - 5.2 arrest notes and other photographic material relating to possible breaches of the injunctions granted in these proceedings;
- 6. The duty of disclosure imposed by paragraph 5 of this Order shall be a continuing one, and shall continue until 1 June 2022.

7. Without the permission of the Court, the Claimants shall make no use of any document disclosed by virtue of paragraph 5 of this Order, other than one or more of the following uses:
- (i) applying to name and join any person as a named defendant to these proceedings and to serve the said person with any document in these proceedings;
 - (ii) investigating, formulating and pleading and prosecuting any claim within these proceedings arising out of any alleged disruptive protest at any of the Claimants' sites which are (or become) the subject of these proceedings;
 - (iii) use for purposes of formulating, pleading and prosecuting any application for committal for contempt of court against any person for breach of any order made within these proceedings.
8. Until further order, the address and address for service of any person who is added as a defendant to these proceedings shall be redacted in any copy of any document which is served other than by means of it being sent directly to that person or their legal representative.

Service

9. Pursuant to CPR r.6.15, r.6.27 and r. 81.4(2)(c) and (d), the Claimants will take the following steps by way of service of the amended Claim Form, this Order and the documents listed in the First Schedule to this Order excluding the original Claim Form (the “**Claim Documents**”) upon the First and Second Defendants:
- 9.1 The Claimants shall position signs which are approximately 1.5m x 1m in size at each main entrance of Pembroke Oil Refinery, Manchester Oil Terminal, Kingsbury Oil Terminal, Plymouth Oil Terminal, Cardiff Oil Terminal, Pembrokeshire Terminal and Avonmouth Oil Terminal, advertising the existence of this Order and of the injunction prohibiting entry to the Site without the consent of the Claimants; and
- 9.2 The Claimants shall position 4 (four) signs, at conspicuous locations along each of Angle Road; the emergency services access road at Pembroke Oil Refinery; Churchill Way; Trafford Wharf Road; Trinity Road; Piccadilly Way; the

privately owned road at the Kingsbury Oil Terminal; Oakfield Terrace Road; Rover Way; Holesmouth Road; King Road Avenue; and 5th Street which are approximately 1.5m x 1m in size, advertising the existence of this Order and the prohibitions upon obstructing the Access Roads (together with a map of the relevant site of at least A2 size identifying the extent of the Access Roads relating to that particular Site); and

9.3 The Claimants shall upload electronic copies of the Claim Documents (in PDF form) to an electronic folder on the “Dropbox” website and shall include the link to the Dropbox folder and the Claimants’ solicitors’ contact details on each of the aforesaid signs; and

9.4 The Claimants shall email a copy of this Order to the email addresses set out in the Appendix hereto.

10. The taking of such steps set out at paragraph 9 shall be good and sufficient service of this Order, and of the Claim Documents, upon the First and Second Defendants and each of them.

11. The Court will provide sealed copies of this Order to the Claimants’ solicitors for service (whose details are set out below).

12. The deemed date of service of the Claim Documents shall be the date of the relevant certificate of service on completion of the steps described at paragraph 9.

Further directions

13. The Defendants or any other person affected by this Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Claimants’ solicitors immediately by emailing valero.service@shoosmiths.co.uk.

14. Any person applying to vary or discharge this order must provide their full name and address, and address for service, and must also apply to be joined as a named defendant to the proceedings at the same time.

15. The Claimants have liberty to apply to extend, vary or discharge this Order, or for further directions.
16. No acknowledgment of service, admission or defence is required by any party until further so ordered.
17. This Order will be reconsidered at a hearing to be listed between 11 January 2023 and 21 January 2023 to determine whether there is a continued threat which justifies continuation of this Order.
18. Costs reserved.

Communications with the Claimants

19. The Claimants' solicitors and their contact details are:

Shoosmiths LLP
2 Colmore Square
38 Colmore Circus Queensway
Birmingham
B4 6SH
(Ref: M-996090)
E: valero.service@shoosmiths.co.uk
T: 03700863000

Dated: [11 April 2022]

First Schedule

Documents considered by the Court at the hearing:

1. Claim Form
2. Application notice dated 5 April 2022 and draft minute of proposed order
3. Witness statement of Adrian Rafferty, dated 18 March 2022
4. Redacted witness statement of David Blackhouse, dated 18 March 2022
5. Witness statement of David McLoughlin, dated 18 March 2022
6. Witness statement of Kate McCall, dated 18 March 2022
7. Witness statement of David Blackhouse, dated 5 April 2022
8. Witness statement of Kate McCall, dated 6 April 2022
9. Witness statement of Laurence Matthews, dated 6 April 2022

Second Schedule

Undertakings given by the Claimants to the Court:

1. To file the amended Claim Form and the note of this hearing by the end of the next working day after the sealing of this Order.
2. To provide to any named defendant copies of further evidence or other documents filed in these proceedings upon request from time-to-time at an email address provided to the Claimants and place all such documents online to be publicly accessible via Dropbox link
3. To comply with any order for compensation which the Court might make in the event that the Court later finds that this Order has caused loss to a defendant and the Court finds that the defendant ought to be compensated for that loss.
4. To seek to identify and name defendants and apply to add them as named defendants to this Order as soon as reasonably practicable.

Third Schedule

Amended description of the Defendants:

- “(1) PERSONS UNKNOWN ENTERING AND REMAINING WITHOUT THE CONSENT OF THE CLAIMANT(S) ON THE LAND KNOWN INFORMALLY AS PEMBROKE REFINERY, MANCHESTER TERMINAL, KINGSBURY TERMINAL, PLYMOUTH TERMINAL, CARDIFF TERMINAL, PEMBROKESHIRE TERMINAL AND AVONMOUTH TERMINAL AND MORE PARTICULARLY DESCRIBED IN THE ORDER OF 11 APRIL 2022 AS THE CLAIMANTS’ LAND**
- (2) PERSONS UNKNOWN CAUSING BLOCKADES, OBSTRUCTIONS OF TRAFFIC AND INTERFERE WITH THE PASSAGE BY THE CLAIMANTS AND THEIR AGENTS, SERVANTS, EMPLOYEES, LICENSEES, INVITEES WITH OR WITHOUT VEHICLES AND EQUIPMENT TO, FROM, OVER AND ACROSS THE ROADS IN THE VICINITY OF THE LAND KNOWN INFORMALLY AS PEMBROKE REFINERY, MANCHESTER TERMINAL, KINGSBURY TERMINAL, PLYMOUTH TERMINAL, CARDIFF TERMINAL, PEMBROKESHIRE TERMINAL AND AVONMOUTH TERMINAL IN CONNECTION WITH ENVIRONMENTAL PROTESTS BY THE JUST STOP OIL AND/OR EXTINCTION REBELLION AND/OR INSULATE BRITAIN AND/OR YOUTH CLIMATE SWARM (ALSO KNOWN AS YOUTH SWARM) MOVEMENTS”**

Fourth Schedule

The Chief Constables:

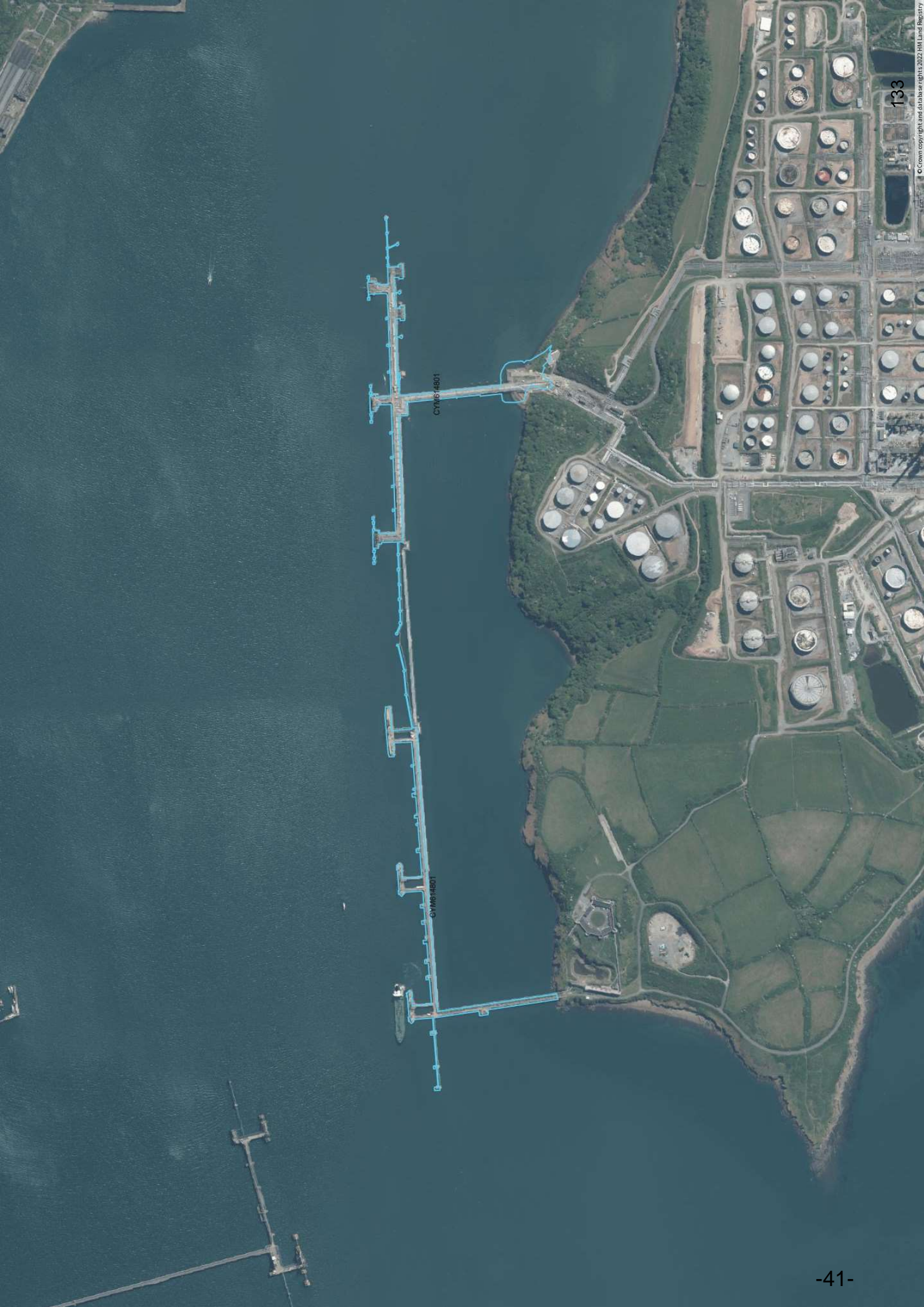
1. The Chief Constable of Devon & Cornwall Police
2. The Chief Constable of Dyfed-Powys Police
3. The Chief Constable of Avon & Somerset Police
4. The Chief Constable of Greater Manchester Police
5. The Chief Constable of South Wales Police
6. The Chief Constable of Warwickshire Police

ANNEXURE A
(“Pembroke Oil Refinery”)



ANNEXURE B

(“Pembroke Oil Refinery Jetties”)



ANNEXURE C
(“Manchester Oil Terminal”)



ANNEXURE D
(“Kingsbury Oil Terminal”)



ANNEXURE E
(“Plymouth Oil Terminal”)



ANNEXURE F
(“Cardiff Oil Terminal”)



ANNEXURE G
(“Avonmouth Oil Terminal”)



ANNEXURE H
(“Pembrokeshire Terminal”)



ANNEXURE I
(“Access Roads”)

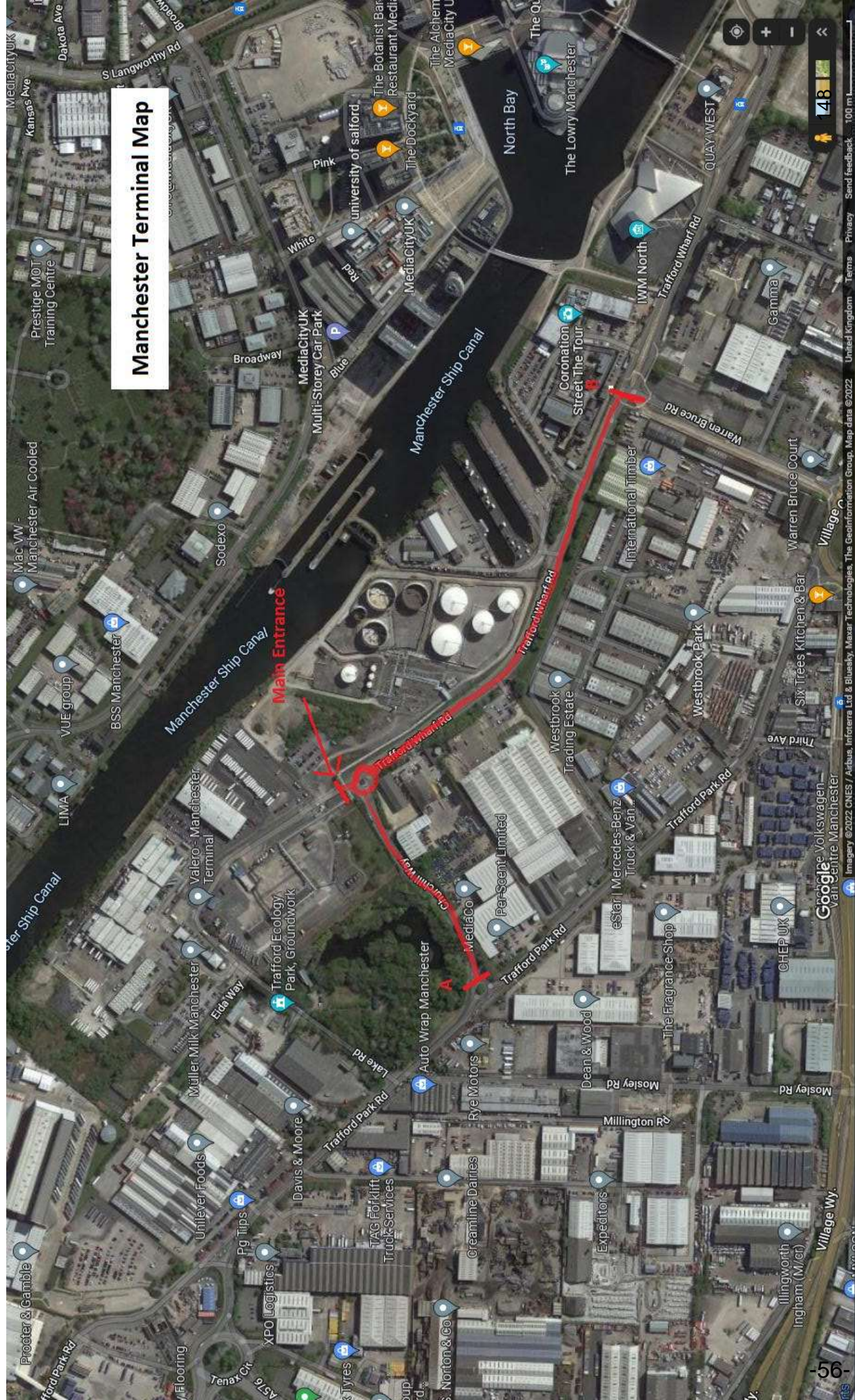


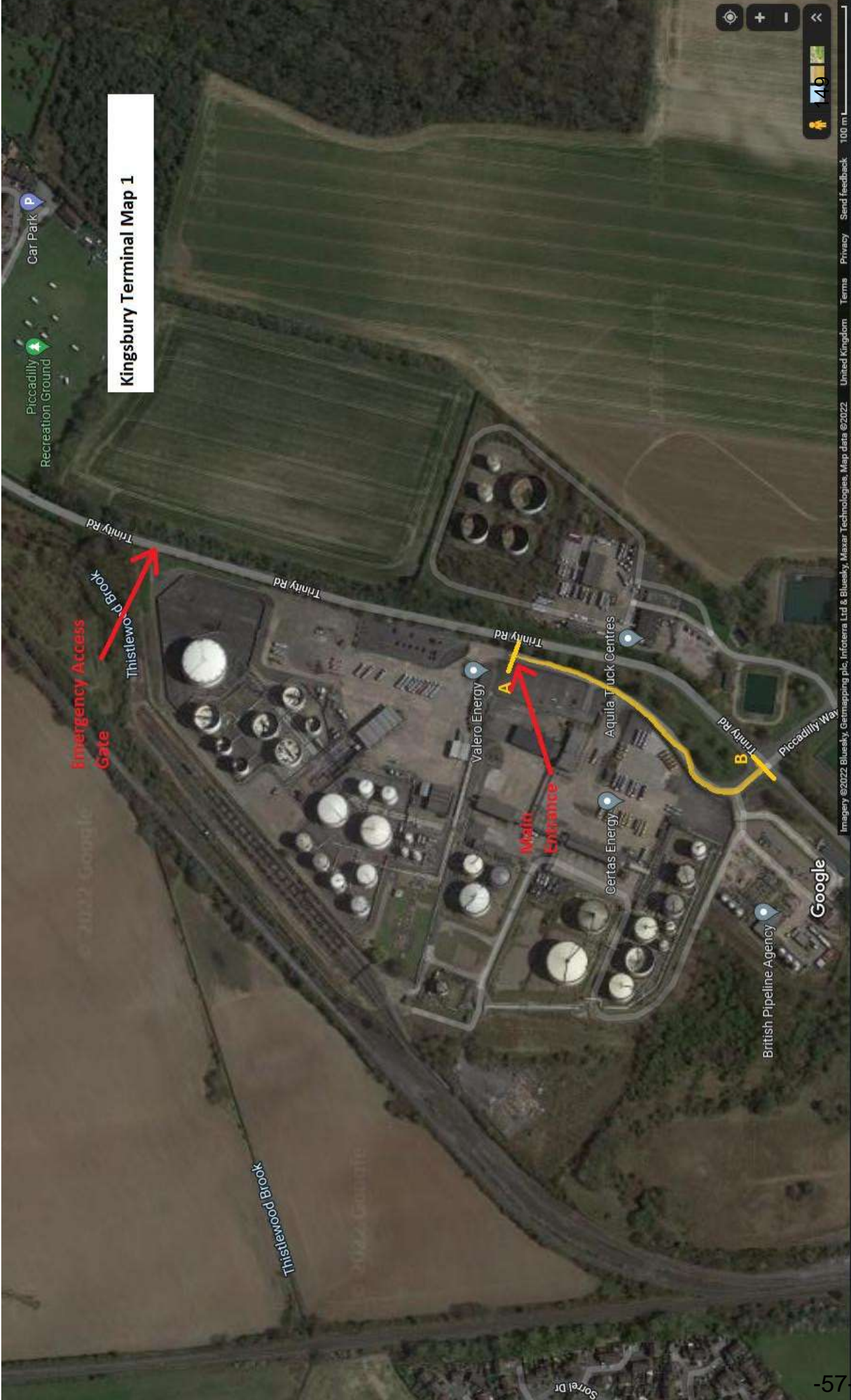
The "Refinery Map"

Green = Jetty

147

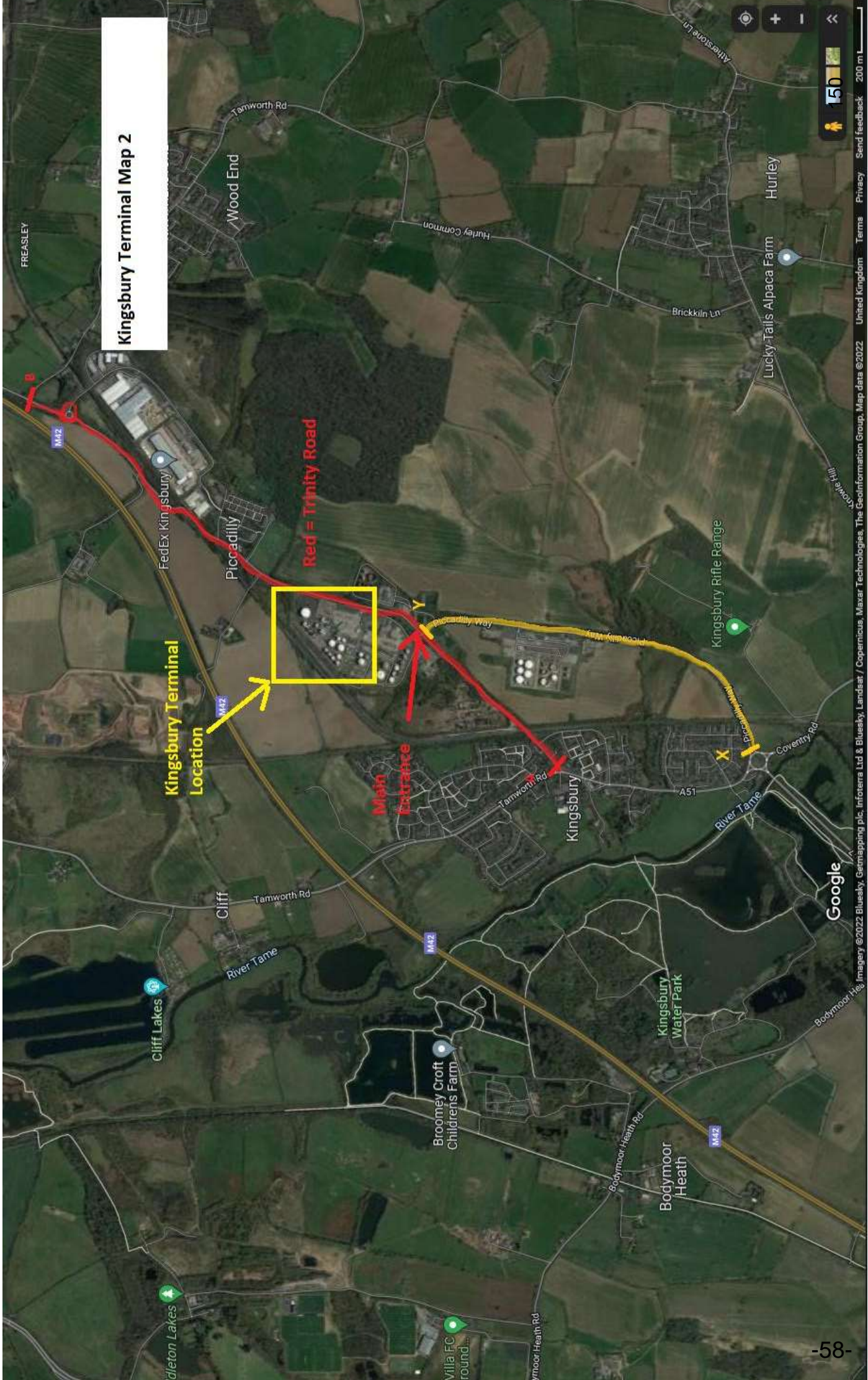
Manchester Terminal Map





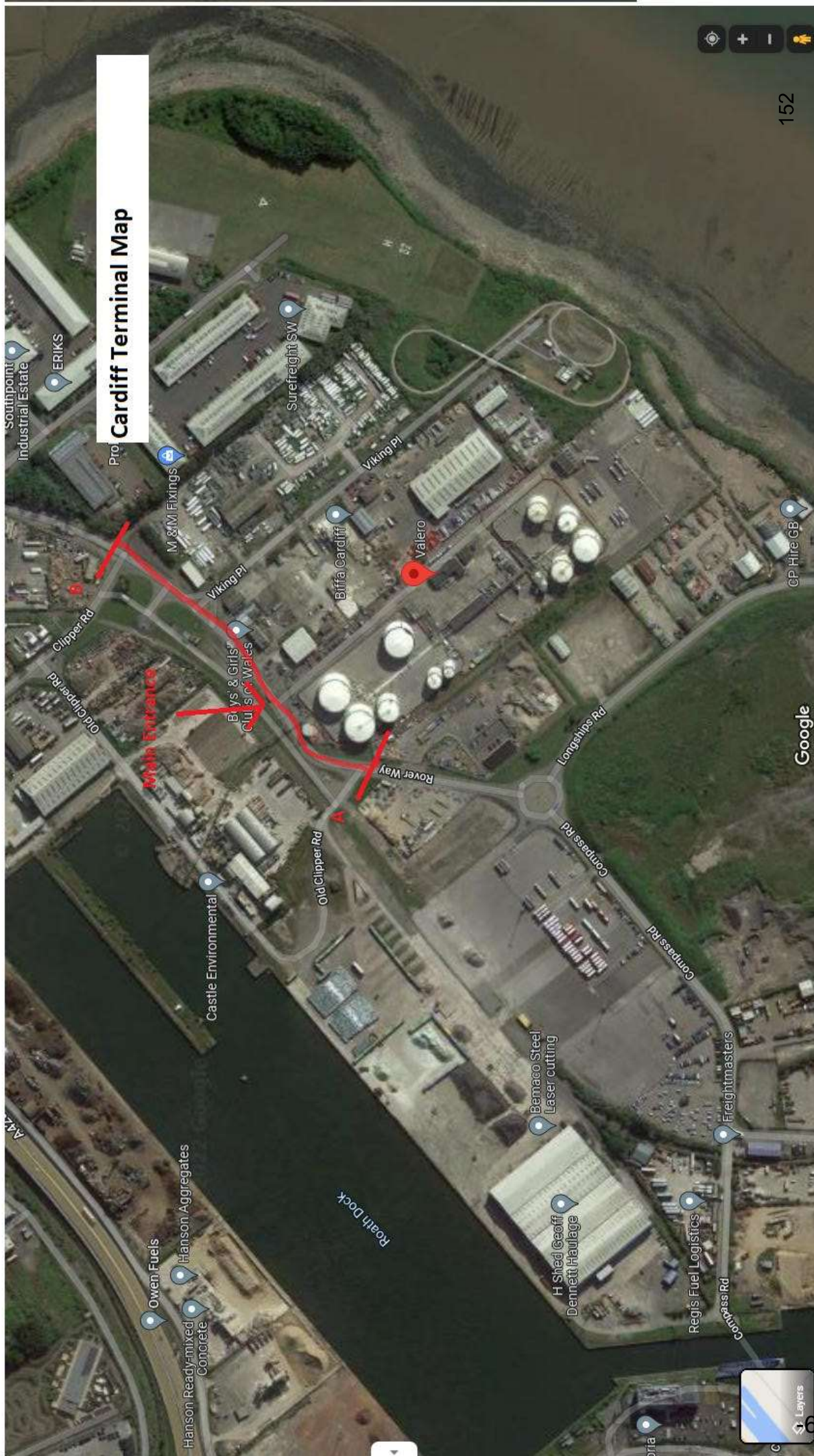
Kingsbury Terminal Map 1

Kingsbury Terminal Map 2



Plymouth Terminal Map





Cardiff Terminal Map

Yellow = Valero Premises

Avonmouth Terminal Map 2



Pembrokeshire Terminal Map



Appendix

Extinction Rebellion UK

- (i) enquiries@extinctionrebellion.uk
- (ii) press@extinctionrebellion.uk
- (iii) xrvideo@protonmail.com
- (iv) xr-action@protonmail.com
- (v) xraffinitysupport@protonmail.com
- (vi) xr-arrestwelfare@protonmail.com
- (vii) artsxr@gmail.com
- (viii) xr-CitizensAssembly@protonmail.com
- (ix) xr.connectingcommunities@gmail.com
- (x) xrdemocracy@protonmail.com
- (xi) xrnotables@gmail.com
- (xii) integration@rebellion.earth
- (xiii) xr-international@protonmail.com
- (xiv) xr-legal@riseup.net
- (xv) press@extinctionrebellion.uk
- (xvi) xr-newsletter@protonmail.com
- (xvii) xr-peoplesassembly@protonmail.com
- (xviii) xrpoliceliasion@protonmail.com
- (xix) rebelringers@rebellion.earth
- (xx) xr.regenerativeculture@gmail.com
- (xxi) xr-regionaldevelopment@protonmail.com
- (xxii) RelationshipsXRUK@protonmail.com
- (xxiii) xr.mandates@gmail.com
- (xxiv) socialmedia@extinctionrebellion.uk
- (xxv) xrsocialmediaevents@gmail.com
- (xxvi) eventsxr@gmail.com
- (xxvii) xrbristol.regional@protonmail.com
- (xxviii) xrcymru@protonmail.com
- (xxix) xr.eastengland@protonmail.com
- (xxx) xrlondoncoord@gmail.com
- (xxxi) XRMidlands@protonmail.com
- (xxxii) xrne@protonmail.com
- (xxxiii) support@xrnorth.org
- (xxxiv) xrni@rebellion.earth
- (xxxv) xrscotland@gmail.com
- (xxxvi) XR-SouthEastRegionalTeam@protonmail.com
- (xxxvii) xr.regional.sw@protonmail.com
- (xxxviii) talksandtraining.xrbristol@protonmail.com

- (xxxix) xrcymrutalksandtraining@gmail.com
- (xl) eoexrtnt@protonmail.com
- (xli) xrlondoncommunityevents@gmail.com
- (xlii) xrmidlandstraining@protonmail.com
- (xliii) XRNE.training@protonmail.com
- (xliv) xrnw.training@gmail.com
- (xlv) xryorkshire.training@gmail.com
- (xlvi) xrni.tt@rebellion.earth
- (xlvii) talksandtrainings.scotland@extinctionrebellion.uk
- (xlviii) xrtse@gmail.com
- (xlix) xrsw.trainings@gmail.com

Just Stop Oil

- (l) Ring2021@protonmail.com
- (li) juststopoil@protonmail.com

Youth Climate Swarm

- (lii) youthclimateswarm@protonmail.com

Insulate Britain

- (liii) Ring2021@protonmail.com
- (liv) iblegal@protonmail.com

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

Claim No. QB-2022-001236

In the matter of an application for an injunction under s.222, Local Government Act 1972 s.130(5), Highways Act 1980 and s.1, Localism Act 2011.

B E T W E E N

NORTH WARWICKSHIRE BOROUGH COUNCIL

and



QB-2022-001236

- (1) DAVID BALDWIN
- (2) THOMAS BARBER
- (3) MICHELLE CADET-ROSE
- (4) TIM HEWES
- (5) JOHN HOWLETT
- (6) JOHN JORDAN
- (7) CARMEN LEAN
- (8) ALISON LEE
- (9) AMY PRITCHARD
- (10) STEPHEN PRITCHARD
- (11) PAUL RAITHBY
- (12) HOLLY ROTHWELL
- (13)
- (14) JOHN SMITH
- (15) BEN TAYLOR
- (16) JANE THEWLIS
- (17) ANTHONY WHITEHOUSE
- (18) ANDREW WORSLEY

(19) PERSONS UNKNOWN WHO ARE ORGANISING, PARTICIPATING IN OR ENCOURAGING OTHERS TO PARTICIPATE IN PROTESTS AGAINST THE PRODUCTION AND/OR USE OF FOSSIL FUELS, IN THE LOCALITY OF THE SITE KNOWN AS KINGSBURY OIL TERMINAL, TAMWORTH B78 2HA

Defendants

INTERIM INJUNCTION ORDER

PENAL NOTICE

IF YOU THE WITHIN NAMED DEFENDANTS OR ANY OF YOU DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH 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 TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED

On the 5 May, 2022, before Mr Justice Sweeting, sitting at the Birmingham Magistrates' Court, Victoria Law Courts, Birmingham B4 6PH, the Court considered an application by the Claimant to continue, in an amended form, an injunction granted by the Court on 14 April 2022.

UPON hearing the Claimant's said application and an application to discharge the injunction brought by Mr Jake Handling and Ms Jessica Branch (the "Applicants")

AND UPON hearing counsel Mr Manning and Ms Crocombe for the Claimant, and Counsel, Mr Simblet QC for the Mr Jake Handling and Ms Jessica Branch, with no other party attending;

AND UPON considering an application for an interim injunction brought by the Claimant pursuant to the above statutory provisions, inviting the Court to exercise its discretion to grant injunctive relief pursuant to s.37(1) Senior Courts Act 1981

AND FURTHER UPON the Court being satisfied for the purposes of section 12(2) of the Human Rights Act 1998 that the Claimant has taken all practicable steps to notify the Defendants of this application.

AND FURTHER UPON the Court having previously been satisfied for the purposes of section 12(3) of the Human Rights Act 1998 that the Claimant is likely to establish at the trial of this claim that any publication restrained by this Order should not be allowed.

AND FURTHER UPON the Court having particular regard to the importance of the Convention right to freedom of expression but finding in the circumstances, having previously been satisfied that it is just and convenient, and proportionate, to grant injunctive relief in the terms set out herein, pending the trial of this claim.

AND FURTHER UPON the Court having previously been satisfied for the purposes of s.27(3), Police and Justice Act 2006, that there is a significant risk of harm to a person or persons from

the conduct prohibited by this Order and that a power of arrest should therefore be granted.

AND pending the court giving its judgment and reaching its decision on the applications mentioned above considering it appropriate to maintain the current position in relation to there being an injunction and a power of arrest until judgment or further order on the applications before the court.

IT IS ORDERED THAT

1. The Defendants SHALL NOT (whether by themselves or by instructing, encouraging or allowing any other person):
 - (a) organise or participate in (whether by themselves or with any other person), or encourage, invite or arrange for any other person to participate in any protest against the production or use of fossil fuels, at Kingsbury Oil Terminal (the “Terminal”), taking place within the areas the boundaries of which are edged in red on the Map attached to this Order at Schedule 1.
 - (b) in connection with any such protest anywhere in the locality of the Terminal perform any of the following acts:
 - (i) entering or attempting to enter the Terminal
 - (ii) congregating or encouraging or arranging for another person to congregate at any entrance to the Terminal
 - (iii) obstructing any entrance to the Terminal
 - (iv) climbing on to or otherwise damaging or interfering with any vehicle, or any object on land (including buildings, structures, caravans, trees and rocks)
 - (v) damaging any land including (but not limited to) roads, buildings, structures or trees on that land, or any pipes or equipment serving the Terminal on or beneath that land
 - (vi) affixing themselves to any other person or object or land (including roads, structures, buildings, caravans, trees or rocks)
 - (vii) erecting any structure
 - (viii) abandoning any vehicle which blocks any road or impedes the passage any other vehicle on a road or access to the Terminal
 - (ix) digging any holes in or tunnelling under (or using or occupying existing tunnels under) land, including roads;
 - (x) abseiling from bridges or from any other building, structure or tree on land or
 - (xi) instructing, assisting, or encouraging any other person to do any act prohibited by paragraphs (b)(i)-(x) of this Order.
2. A power of arrest, pursuant to s.27 Police and Justice Act 2006 shall apply to paragraph 1(a) and (b) above.
3. This Order and power of arrest shall continue until the hearing of the Claim unless previously varied or discharged by further Order of the Court.
4. Any person served with a copy of, or affected by, this Order may apply to the Court to

vary or discharge it, on 48 hours written notice to the Claimant at the address set out at the foot of this Order.

5. Pursuant to CPR rules 6.15, 6.27 and 81.4(2) (c) and (d), the Claimant shall be permitted to serve the Claim Form and supporting documents relied on, and this Order and power of arrest, by the alternative methods specified at Schedule 2 to this Order. Reservice of the Claim Form and supporting documents is dispensed with.
6. The deemed date of service of the documents referred to at paragraph 5 above shall be the date of the relevant certificate of service on completion of the steps described in Schedule 2 to this Order.

If you do not fully understand this Order you should go to a solicitor, Legal Advice Centre or Citizens' Advice Bureau.

Name and Address of the Claimant's Legal Representatives

Ms Annie Ryan

The Council House

South Street

Atherstone

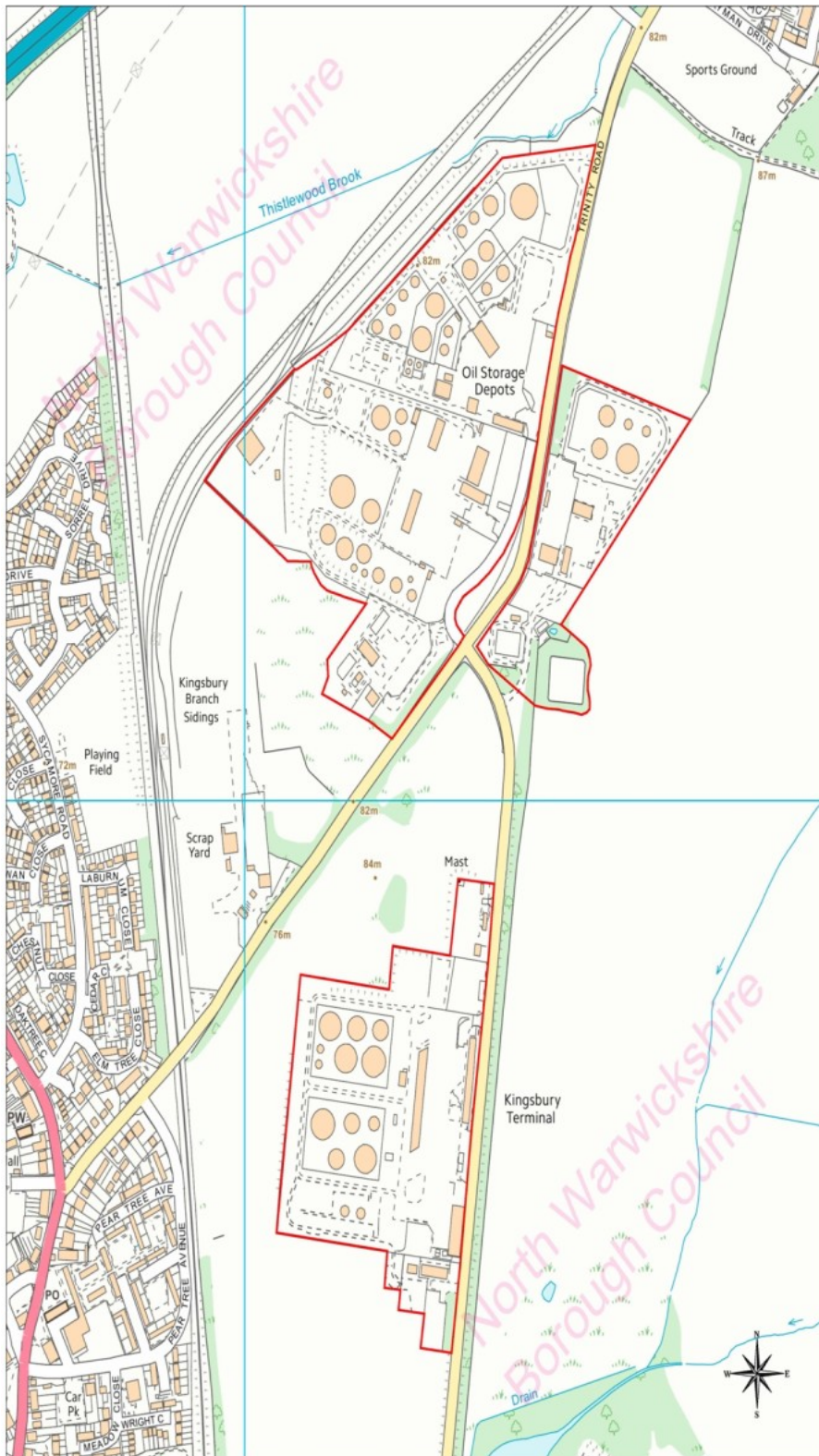
Warwickshire CV9 1DE

Email:

clivetobin@northwarks.gov.uk

annieryan@northwarks.gov.uk

SCHEDULE 1



(c) Crown Copyright and database rights 2022
Ordnance Survey 100017910



North Warwickshire
Borough Council



Operator:	xxxxxx
Department:	xxxxxx
Drawing No:	nnnnnn
Date: 06/05/2022	Scale: 1:5000

SCHEDULE 2

1. Service of the Claim Form and this Order shall be effected by
 - (i) placing signs informing people of
 - (a) this Claim,
 - (b) this Order and power of arrest, and the area in which they have effect and
 - (c) where they can obtain copies of the Claim Form. Order and power of arrest, and the supporting documents used to obtain this Orderin prominent locations along the boundary of the buffer zone referred to at para.1 of this Order and particularly outside the Terminal and at the junctions of roads leading into the zone,
 - (ii) placing a copy prominently at the entrances to the Terminal;
 - (iii) posting a copy of the documents referred to at para.1(i)(c) above Order on its website, and publicising it using the Claimant's facebook page and twitter account, and posting on other relevant social media sites including local police social media accounts, and/or.
 - (iv) any other like manner as the Claimant may decide to use in order to bring the Claim Form and this Order and power of arrest to the attention of the Defendants and other persons likely to be affected.
2. If the Claimant intends to take enforcement proceedings against any person in respect of this Order, the Claimant shall, no later than the time of issuing such proceedings, serve on that person,
 - (i) a copy of the Claim Form and all supporting documents relied on to obtain this Order; and
 - (ii) a copy of this Order and power of arrest.
3. The Court will consider whether to join the person served to the proceedings as a named Defendant and whether to make any further Order.

Signed *Mr Justice Sweeting*

Dated 6th May 2022

IN THE HIGH COURT OF JUSTICE.

CLAIM No: QB-2022-000904

KINGS BENCH DIVISION

Before: Mr Justice Soole

On: 20 January 2023

BETWEEN

**(1) VALERO ENERGY LIMITED
(2) VALERO LOGISTICS UK LIMITED
(3) VALERO PEMBROKESHIRE OIL TERMINAL LIMITED**



-and-

QB-2022-000904

**(1) PERSONS UNKNOWN ENTERING AND REMAINING WITHOUT THE
CONSENT OF THE CLAIMANT(S) ON THE LAND KNOWN INFORMALLY
AS PEMBROKE REFINERY, MANCHESTER TERMINAL, KINGSBURY
TERMINAL, PLYMOUTH TERMINAL, CARDIFF TERMINAL,
PEMBROKESHIRE TERMINAL AND AVONMOUTH TERMINAL AND MORE
PARTICULARLY DESCRIBED IN THIS ORDER**

**(2) PERSONS UNKNOWN CAUSING BLOCKADES, OBSTRUCTIONS OF
TRAFFIC AND/ INTERFERE WITH THE PASSAGE BY THE CLAIMANTS
AND THEIR AGENTS, SERVANTS, EMPLOYEES, LICENSEES, INVITEES
WITH OR WITHOUT VEHICLES AND EQUIPMENT TO, FROM, OVER AND
ACROSS THE ROADS IN THE VICINITY OF THE LAND KNOWN
INFORMALLY AS PEMBROKE REFINERY, MANCHESTER TERMINAL,
KINGSBURY TERMINAL, PLYMOUTH TERMINAL, CARDIFF TERMINAL,
PEMBROKESHIRE TERMINAL AND AVONMOUTH TERMINAL IN
CONNECTION WITH ENVIRONMENTAL PROTESTS BY THE JUST STOP
OIL AND/OR EXTINCTION REBELLION AND/OR INSULATE BRITAIN
AND/OR YOUTH CLIMATE SWARM (ALSO KNOWN AS YOUTH SWARM)
MOVEMENTS**

(3) MRS ALICE BRENCHER AND 68 OTHERS

Defendants

ORDER

PENAL NOTICE

IF YOU THE WITHIN NAMED DEFENDANTS OR ANY OF YOU DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH 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 TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD 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 the acts set out in this Order. You should read it very carefully. You are advised to consult a solicitor as soon as possible. You have the right to ask the Court to vary or discharge this Order.

UPON the review hearing pursuant to paragraph 17 of the Order of Mr Justice Cotter dated 20 September 2022

AND UPON the Claimants' Application for alternative service dated 9 January 2023 (**"Application for Alternative Service"**)

AND UPON reading the documents in support of the Application for Alternative Service and the documents set out in the First Schedule to this Order

AND UPON hearing Myriam Stacey KC and Joel Semakula for the Claimants

AND UPON there being no appearance or representation on behalf of any defendant

AND UPON the Claimants giving the undertakings set out in the Second Schedule to this Order

AND UPON the Claimants confirming (for the avoidance of doubt) that this Order is not intended to prohibit lawful protest in the vicinity of the Claimants' Land which does not breach the terms of this Order, nor does the order seek to prevent lawful use of the Access Roads by any person.

IT IS ORDERED THAT:

Alternative Service Application

1. The Claimants are given retrospective permission under CPR Part 6.15 and CPR Part 6.27 to serve copies of the bundle for the hearing on 18 January 2023 and those witness statements pertaining to the hearing (being the statements listed as 11-13 in the First Schedule) , on those Named Defendants who have provided service addresses within the United Kingdom , by the alternative methods detailed below:

- 1.1 by uploading electronic copies of the hearing bundle and witness statements to an electronic folder on the existing Valero “Dropbox” website;

and

- 1.2 by writing to each of the aforementioned Named Defendants and:-

- 1.2.1 confirming that an electronic copy of the bundle and the new witness statements will be made available to view or download on the Dropbox site dedicated to this Claim, no later than 3 working days before the hearing;

- 1.2.2 supplying details of the Dropbox site link;

- 1.2.3 confirming that the Claimants will provide hard copies of the bundles and witness statements if requested to do so by a Defendant, either to the address which they have on record for that Defendant, or to such alternative address as the Defendant shall notify to the Claimants solicitors in writing or by bringing a hard copy of the bundle to the hearing for that Defendant to use.

2. The taking of such steps set out in paragraph 1 shall be good and sufficient service of the witness statements and the hearing bundle on those Named Defendants who have provided service addresses within the United Kingdom.

Order of 11 April 2022

3. The interim injunctions set out within paragraph 5 of the Order of Bennathan J dated 11 April 2022 as amended and restated by the Order of Cotter J dated 20 September 2022 are replaced by the interim injunctions contained in paragraph 5 of this Order.

Definitions

4. For the purposes of this Order,

4.1 the “**Claimants’ Land**” means all of the property referred to and defined in paragraph 5.1 hereof;

4.2 “**Site**” means the Claimants’ site at any location, forming part of the Claimants’ Land and identified in paragraph 5.1 of this Order, and which is either (i) from time to time wholly or substantially enclosed or bounded by walls, gates, fences, barriers, hedges, bodies of water or other man-made or natural boundary features or (ii) forms private roads and car parks outside of such enclosure or boundary feature;

4.3 the “**Access Roads**” means those parts of the roads in the vicinity of the Claimants’ Land which provide access to each of the sites forming parts of the Claimants’ Land, the location and extent of which are more particularly shown for identification purposes coloured variously red, yellow and blue on the plans annexed hereto at Annex I to this Order.

Injunction

5. With immediate effect until 23:59 on 8 February 2024, unless varied, discharged or extended by further order, the Defendants and each of them are forbidden from doing the following:

5.1 Entering or remaining upon any part of the following property without the Claimants’ permission:

- a) the First Claimant’s Site informally known as ‘Pembroke Refinery’ situated at Angle, Pembroke SA71 5SJ, the general location and extent of which is shown outlined in red on the plan exhibited hereto in Annex A (“**Pembroke Oil Refinery**”);

- b) the First Claimant's Site, informally known as 'Tanker berthing jetties at Pembroke Refinery' situated at Angle, Pembroke SA71 5SJ, the general location and extent of which is shown outlined in blue on the exhibited hereto in Annex B ("**Pembroke Oil Refinery Jetties**");
- c) the Second Claimant's Site, informally known as 'Manchester Terminal' situated at Trafford Wharf Road, Trafford, the general location and extent of which is shown outlined in red on the exhibited hereto in Annex C (the "**Manchester Oil Terminal**");
- d) the Second Claimant's Site, informally known as 'Kingsbury Terminal' at Plot B Trinity Road, Kingsbury, Tamworth, the general location and extent of which is shown outlined in red on the exhibited hereto in Annex D (the "**Kingsbury Oil Terminal**");
- e) the Second Claimant's Site informally known 'Plymouth Terminal' at Oakfield Terrace Road, Cattedown, Plymouth, the general location and extent of which is shown outlined in red on the exhibited hereto in Annex E (the "**Plymouth Oil Terminal**");
- f) the Second Claimant's Site informally known as 'Cardiff Terminal' at Valero Refinery, Roath Dock, Rover Way, Cardiff CF10 4US, the general location and extent of which is shown outlined in red on the exhibited hereto in Annex F (the "**Cardiff Oil Terminal**");
- g) the Second Claimant's Site informally known as 'Avonmouth Terminal', Avonmouth Dock, Bristol, the general location and extent of which is shown outlined in red on the exhibited hereto in Annex G (the "**Avonmouth Oil Terminal**"); and

- h) the Third Claimant's Site informally known as 'Valero Pembroke Oil Terminal', Waterston, Milford Haven, the general location and extent of which is shown outlined in red on the exhibited hereto in Annex H (the **"Pembrokeshire Terminal"**);

- 5.2 Blocking any entranceway to the Claimants' Land;
- 5.3 Damaging any part of the Claimants' Land;
- 5.4 Affixing themselves to any other person or object on or otherwise to the Claimants' Land or the aforesaid parts of the Access Roads;
- 5.5 Erecting any structure on the Claimants' Land or on the aforesaid parts of the Access Roads;
- 5.6 Abandoning any vehicle or item on the aforesaid parts of the Access Roads;
- 5.7 Tunnelling under or using or occupying existing tunnels under the aforesaid parts of the Access Roads with the intention of preventing their use;
- 5.8 Causing, assisting or encouraging any other person to do any act prohibited by paragraphs 5.1 to 5.7 above;

Disclosure against non-party

- 6. Pursuant to CPR 31.17, the Chief Constables listed in the Third Schedule shall as soon as reasonably practicable upon request by the Claimants give disclosure by provision of copy of documents in the following classes to the Claimants:
 - 6.1 documents identifying the names and addresses of any person who is arrested by one of their officers in the course of, or as a result of the protests which are the subject of these proceedings at the Claimants' Land or on the Access Roads, in relation to conduct which may constitute a possible breach of the injunctions granted in these proceedings;
 - 6.2 arrest notes and other photographic material relating to possible breaches of the injunctions granted in these proceedings;

7. The duty of disclosure imposed by paragraph 6 of this Order shall be a continuing one, and shall continue until 23:59 on 8 February 2024.
8. Without the permission of the Court, the Claimants shall make no use of any document disclosed by virtue of paragraph 6 of this Order, other than one or more of the following uses:
 - (i) applying to name and join any person as a named defendant to these proceedings and to serve the said person with any document in these proceedings;
 - (ii) investigating, formulating and pleading and prosecuting any claim within these proceedings arising out of any alleged disruptive protest at any of the Claimants' sites which are (or become) the subject of these proceedings;
 - (iii) use for purposes of formulating, pleading and prosecuting any application for committal for contempt of court against any person for breach of any order made within these proceedings.
9. Until further order, the address and address for service of any person who is added as a defendant to these proceedings shall be redacted in any copy of any document which is served other than by means of it being sent directly to that person or their legal representative.
10. This Order shall be served on the Chief Constables listed in the Third Schedule.

Service

11. The Claimants will take the following steps by way of service of this Order and the documents listed in the First Schedule to this Order (to the extent that they have not already been served) (the “**Claim Documents**”) upon the First and Second Defendants:
 - 11.1 uploading electronic copies (in PDF form) to an electronic folder on the “Dropbox” website; and
 - 11.2 emailing electronic copies to the email addresses set out in the Appendix hereto.
12. The Claimants shall remove the existing signage advertising the existence of previous orders and shall:-

- 12.1.1 position new signs which are approximately 1.5m x 1m in size at each main entrance of Pembroke Oil Refinery, Manchester Oil Terminal, Kingsbury Oil Terminal, Plymouth Oil Terminal, Cardiff Oil Terminal, Pembrokeshire Terminal and Avonmouth Oil Terminal, advertising the existence of this Order and of the injunction prohibiting entry to the Site without the consent of the Claimants; and
 - 12.1.2 position 4 (four) signs, at conspicuous locations along each of Angle Road; the emergency services access road at Pembroke Oil Refinery; Churchill Way; Trafford Wharf Road; Trinity Road; Piccadilly Way; the privately owned road at the Kingsbury Oil Terminal; Oakfield Terrace Road; Rover Way; Holesmouth Road; King Road Avenue; and 5th Street which are approximately 1.5m x 1m in size, advertising the existence of this Order and the prohibitions upon obstructing the Access Roads (together with a map of the relevant site of at least A2 size identifying the extent of the Access Roads relating to that particular Site);
 - 12.1.3 the aforesaid signs shall include a link to the Dropbox folder and the Claimants' solicitors' contact details.
13. The Claimants will take the following steps by way of service of this Order and the Claim Documents upon the Named Defendants who have failed to provide an address for service in the United Kingdom:
- 13.1 uploading electronic copies to an electronic folder on the "Dropbox" website; and
 - 13.2 emailing electronic copies of the same (in PDF format) to the various email addresses associated with the protest groups that have previously threatened to and indeed carried out the unlawful activities (as set out in the Appendix to the Order) with the words FOR THE URGENT ATTENTION OF [NAME]" in the email heading and the words "VERY URGENT: ATTACHED TO THIS EMAIL IS AN ORDER OF THE HIGH COURT OF ENGLAND AND WALES WHICH OUGHT TO BE BROUGHT TO THE ATTENTION OF [NAME]. [NAME] SHOULD READ THIS EMAIL AND ITS ATTACHMENTS IMMEDIATELY. IF HARD COPIES OF THE ATTACHED DOCUMENTS ARE REQUIRED, [NAME] SHOULD

PROVIDE AN ADDRESS FOR SERVICE OF THE SAME WITHIN THE UNITED KINGDOM BY EMAILING valero.service@shoosmiths.co.uk...” in bold letters in the body of the covering email.

14. This Order shall be personally served upon those Named Defendants who have provided addresses for service within the United Kingdom.
15. The taking of such steps set out at paragraphs 11-14 shall be good and sufficient service of this Order and of the Claim Documents, upon the Defendants and each of them.
16. The Court will provide sealed copies of this Order to the Claimants’ solicitors for service (whose details are set out below).
17. The deemed date of service of the Claim Documents shall be the date of the relevant certificate of service on completion of the steps described at paragraphs 11-14.

Further directions

18. The Defendants or any other person affected by this Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Claimants’ solicitors immediately by emailing valero.service@shoosmiths.co.uk.
19. Any person applying to vary or discharge this order must provide their full name and address, and address for service, and must also apply to be joined as a named defendant to the proceedings at the same time.
20. The Claimants have liberty to apply to extend, vary or discharge this Order, or for further directions.
21. No acknowledgment of service, admission or defence is required by any party until further so ordered.
22. This Order will be reconsidered at a hearing to be listed between 16 and 27 January 2024 to determine whether there is a continued threat which justifies its continuation.
23. Costs reserved.

Communications with the Claimants

24. The Claimants' solicitors and their contact details are:

Shoosmiths LLP
2 Colmore Square
38 Colmore Circus Queensway
Birmingham
B4 6SH
(Ref: M-1000643)
E: valero.service@shoosmiths.co.uk
T: 03700863000

Dated: 20 January 2023

First Schedule

Documents considered by the Court at the hearing:

1. Re-Amended Claim Form dated 26 September 2022
2. Application notice dated 6 April 2022 and draft minute of proposed order
3. Witness statement of Adrian Rafferty, dated 18 March 2022
4. Redacted witness statement of David Blackhouse, dated 18 March 2022
5. Witness statement of David McLoughlin, dated 18 March 2022
6. Witness statement of Kate McCall, dated 18 March 2022
7. Witness statement of David Blackhouse, dated 5 April 2022
8. Witness statement of Kate McCall, dated 6 April 2022
9. Witness statement of Laurence Matthews, dated 6 April 2022
10. Witness statement of Richard Willcox dated 27 April 2022
11. Witness statement of David Blackhouse, dated 11 January 2023
12. Witness statement of Kate McCall, dated 9 January 2023
13. Witness statement of Aimee Cook, dated 11 January 2023

Second Schedule

Undertakings given by the Claimants to the Court:

1. To file the Claimants' solicitors' note of this hearing by the end of the next working day after the sealing of this Order.
2. By 4pm on 20 January 2023, to file a further witness statement as to the postal service by letters dated 10 January 2023 of the documents referred to below:
 - a. Claimants' Application for alternative service dated 9 January 2023 and supporting Witness Statement of Kate McCall (fourth) dated 9 January 2023;
 - b. Witness Statements of:-

David Blackhouse (third), dated 11 January 2023
Kate McCall (third), dated 9 January 2023
Aimee Cook (first), dated 11 January 2023

- c. Instructions on how to access the Dropbox site containing the Bundle for the hearing on 18 January 2023
3. To provide to any named defendant with copies of further evidence or other documents filed in these proceedings upon request from time-to-time at an email address provided to the Claimants and place all such documents online to be publicly accessible via Dropbox link
4. To comply with any order for compensation which the Court might make in the event that the Court later finds that this Order has caused loss to a defendant and the Court finds that the defendant ought to be compensated for that loss.
5. To seek to identify and name defendants and apply to add them as named defendants to this Order as soon as reasonably practicable.

Third Schedule

The Chief Constables:

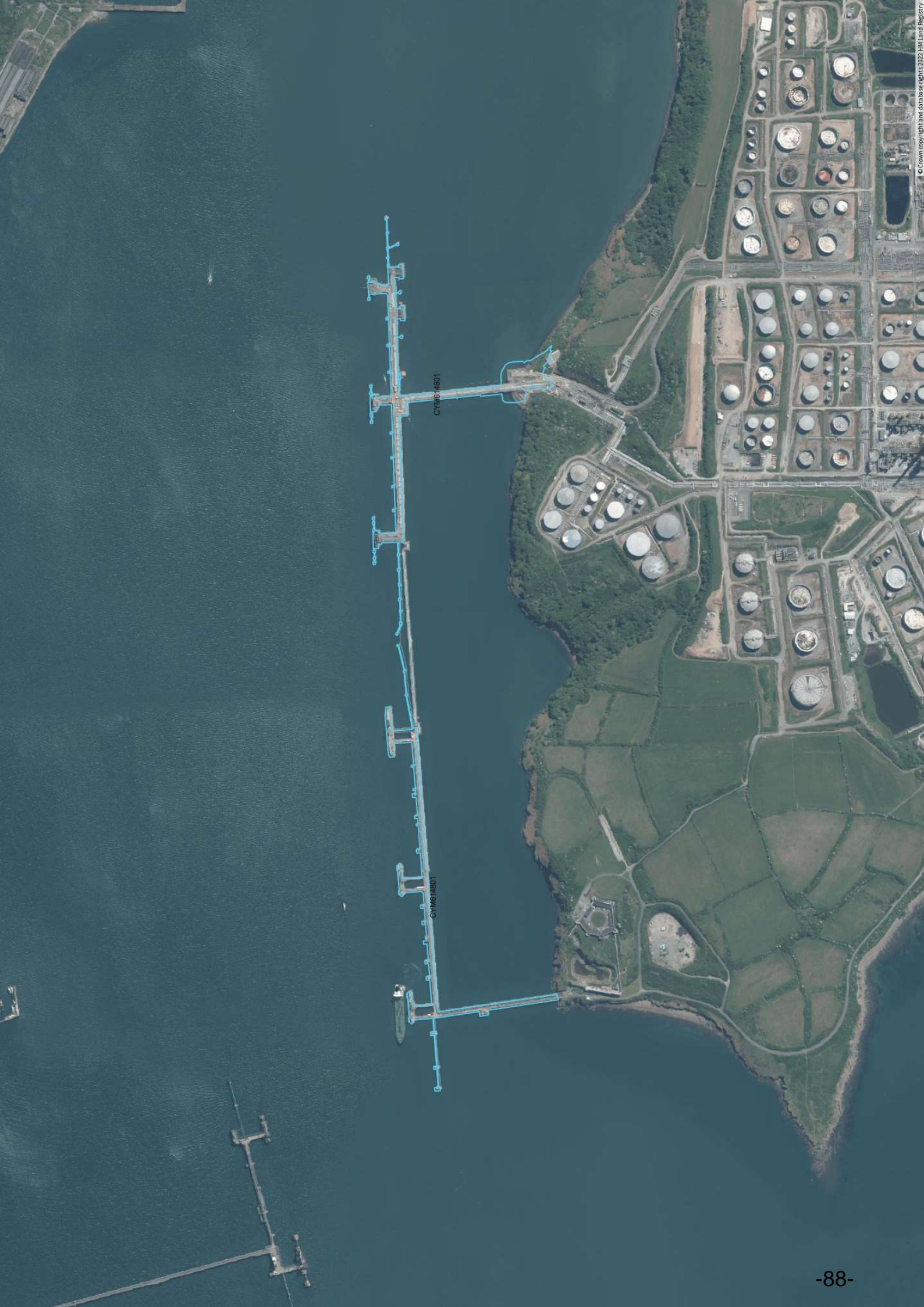
1. The Chief Constable of Devon & Cornwall Police
2. The Chief Constable of Dyfed-Powys Police
3. The Chief Constable of Avon & Somerset Police
4. The Chief Constable of Greater Manchester Police
5. The Chief Constable of South Wales Police
6. The Chief Constable of Warwickshire Police

ANNEXURE A
(“Pembroke Oil Refinery”)



ANNEXURE B

(“Pembroke Oil Refinery Jetties”)



ANNEXURE C
(“Manchester Oil Terminal”)



ANNEXURE D
(“Kingsbury Oil Terminal”)



ANNEXURE E
(“Plymouth Oil Terminal”)



ANNEXURE F
(“Cardiff Oil Terminal”)



ANNEXURE G
(“Avonmouth Oil Terminal”)



ANNEXURE H
(“Pembrokeshire Terminal”)



ANNEXURE I
(“Access Roads”)



The "Refinery Map"

Green = Jetty

Main Entrance

Auxiliary Admin/Car
Park Entrance

B

Rhoscrowther

Valero

Pembroke Refinery

Valero Energy Pembroke

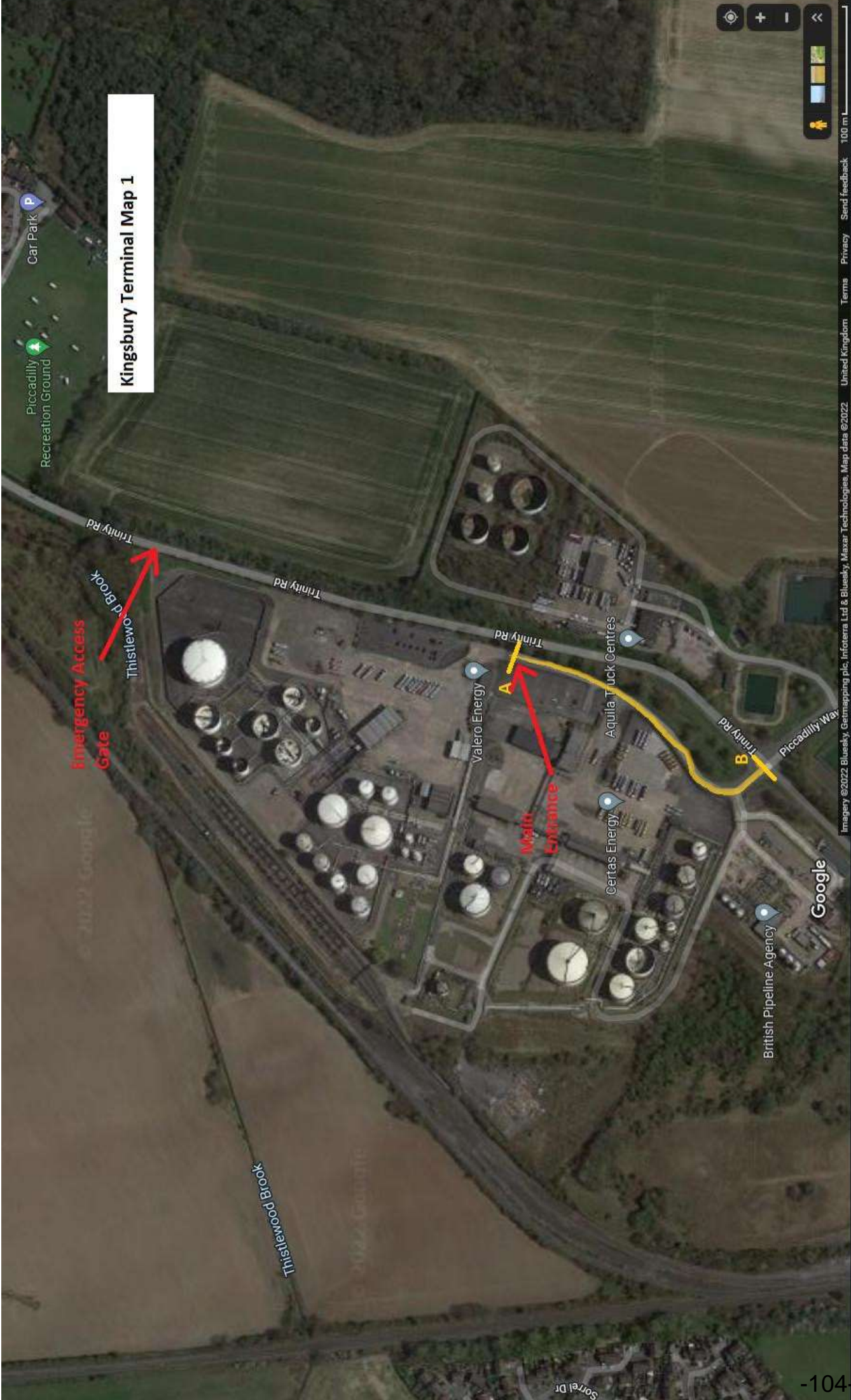
Milford Haven

Popton Fort

Manchester Terminal Map

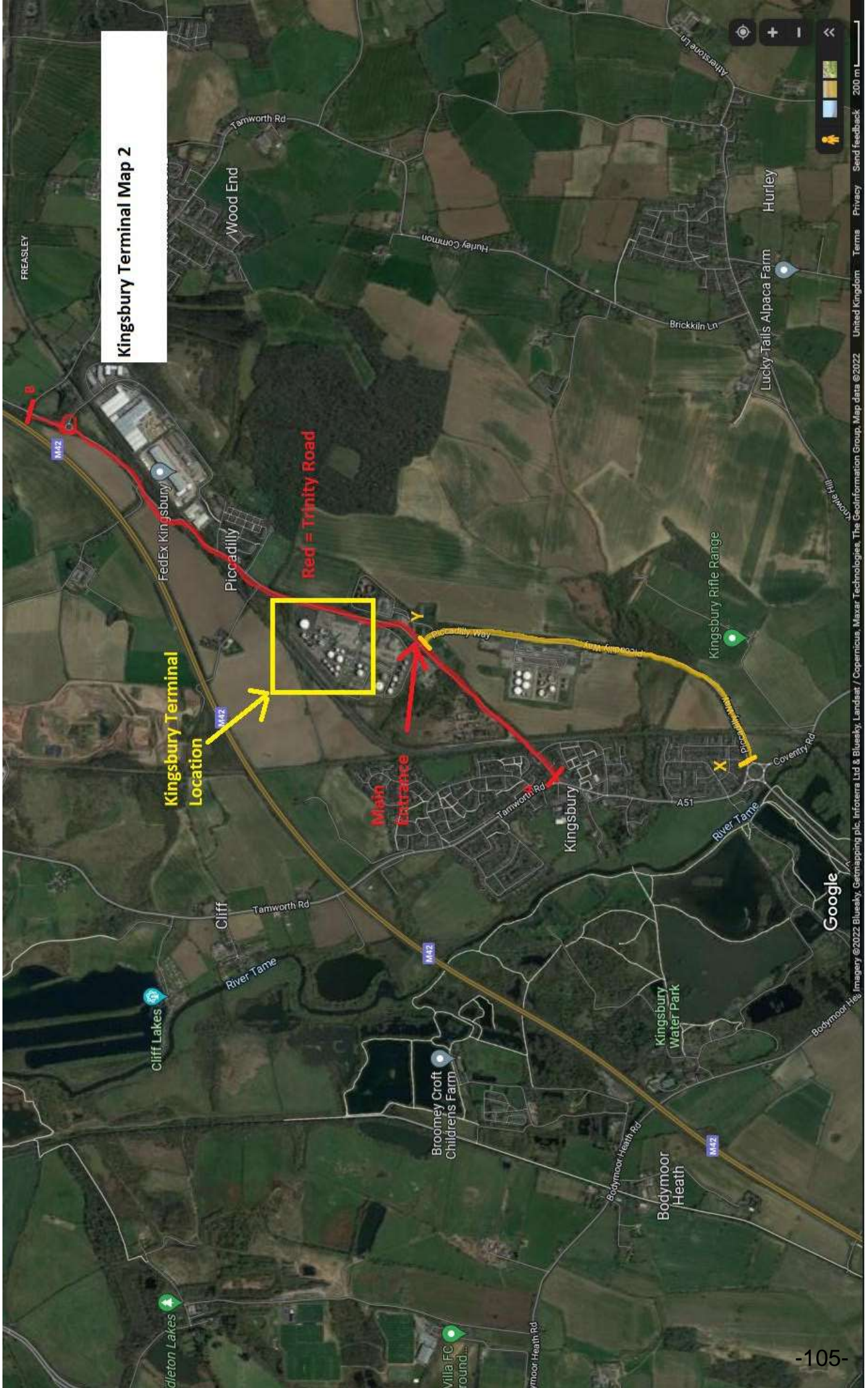
The map displays the Manchester Terminal area, featuring the Manchester Ship Canal and surrounding industrial and commercial zones. A red line highlights a specific route starting from the 'Main Entrance' and ending near Trafford Wharf Rd. Key locations and roads visible include:

- Main Entrance** (marked with a red 'X')
- Manchester Ship Canal**
- University of Salford**
- Trafford Wharf Rd**
- Trafford Park Rd**
- MediaCityUK**
- Coronation Street The Tour**
- Westbrook Park**
- Warren Bruce Rd**
- International Timber**
- Valero - Manchester Terminal**
- Trafford Ecology Park, Groundwork**
- Auto Wrap Manchester**
- MediaCo**
- Per-Scint Limited**
- eStar! Mercedes-Benz Truck & Van**
- The Fragrance Shop**
- Dean & Wood**
- Millington Rd**
- Expeditors**
- Illingworth Ingham (M/c)**
- Village Wy.**
- Churn Way**
- Auto Motors**
- Rye Motors**
- Creamline Dairies**
- Norton & Co**
- TAG Forklift Truck Services**
- Davis & Moore**
- Pg Tips**
- XPO Logistics**
- Tenax Ckt**
- Unilever Foods**
- Müller Milk Manchester**
- Eida Way**
- Valero - Manchester Terminal**
- LIMA**
- VUE group**
- BSS Manchester**
- Mac VW - Manchester Air Cooled**
- Prestige MOT Training Centre**
- Kansas Ave**
- S Langworthy Rd**
- White**
- Pink**
- MediaCityUK Multi-Storey Car Park**
- MediaCityUK**
- The Dockyard**
- The Botanist Bar Restaurant MediaCityUK**
- The Alchem MediaCityUK**
- The Lowry Manchester**
- QUAY WEST**
- IWM North**
- Gamma**
- Warren Bruce Court**
- Six Trees Kitchen & Bar**
- CHP UK**
- Google Volkswagen - Val Centre Manchester**
- Imagery © 2022 CNES / Airbus, Infoterra Ltd & BlueSky, Maxar Technologies, The GeoInformation Group, Map data © 2022 United Kingdom - Terms Privacy Send feedback 100 m**

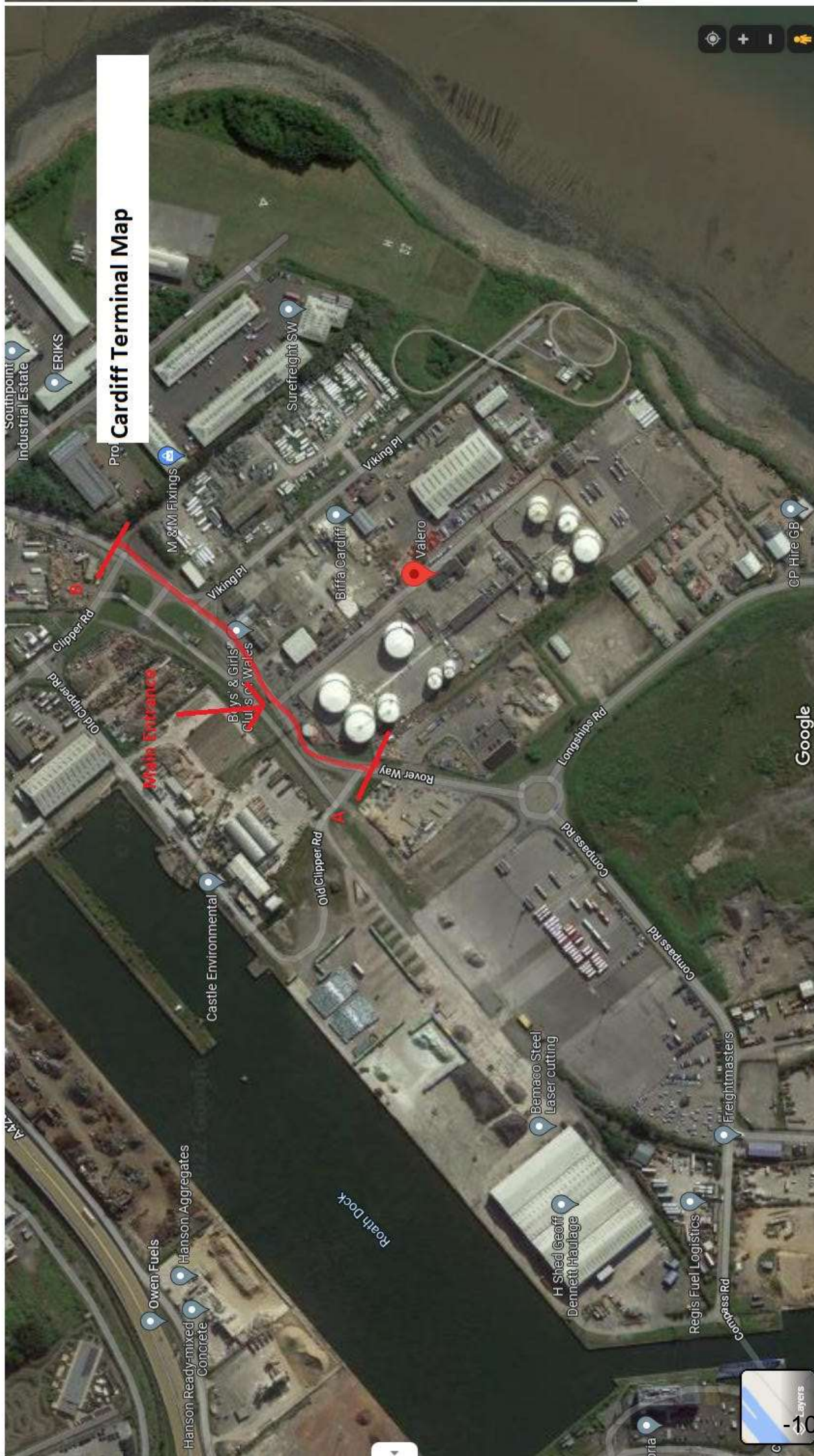


Kingsbury Terminal Map 1

Kingsbury Terminal Map 2



[illegible]



Cardiff Terminal Map

Yellow = Valero Premises

Avonmouth Terminal Map 2



Pembrokehire Terminal Map



Appendix

Extinction Rebellion UK

- (i) enquiries@extinctionrebellion.uk
- (ii) press@extinctionrebellion.uk
- (iii) xrvideo@protonmail.com
- (iv) xr-action@protonmail.com
- (v) xraffinitysupport@protonmail.com
- (vi) xr-arrestwelfare@protonmail.com
- (vii) artsxr@gmail.com
- (viii) xr-CitizensAssembly@protonmail.com
- (ix) xr.connectingcommunities@gmail.com
- (x) xrdemocracy@protonmail.com
- (xi) xrnotables@gmail.com
- (xii) integration@rebellion.earth
- (xiii) xr-international@protonmail.com
- (xiv) xr-legal@riseup.net
- (xv) press@extinctionrebellion.uk
- (xvi) xr-newsletter@protonmail.com
- (xvii) : xr-peoplesassembly@protonmail.com
- (xviii) xrpoliceliasion@protonmail.com
- (xix) rebelringers@rebellion.earth
- (xx) xr.regenerativeculture@gmail.com
- (xxi) xr-regionaldevelopment@protonmail.com
- (xxii) RelationshipsXRUK@protonmail.com
- (xxiii) xr.mandates@gmail.com
- (xxiv) socialmedia@extinctionrebellion.uk
- (xxv) xrsocialmediaevents@gmail.com
- (xxvi) eventsxr@gmail.com
- (xxvii) xrbristol.regional@protonmail.com
- (xxviii) xrcymru@protonmail.com
- (xxix) xr.eastengland@protonmail.com
- (xxx) xrlondoncoord@gmail.com
- (xxxix) XRMidlands@protonmail.com

- (xxxii) xrne@protonmail.com
- (xxxiii) support@xrnorth.org
- (xxxiv) xrni@rebellion.earth
- (xxxv) xrscotland@gmail.com
- (xxxvi) XR-SouthEastRegionalTeam@protonmail.com
- (xxxvii) xr.regional.sw@protonmail.com
- (xxxviii) talksandtraining.xrbristol@protonmail.com
- (xxxix) xrcymrutalksandtraining@gmail.com
- (xl) eoexrtnt@protonmail.com
- (xli) xrlondoncommunityevents@gmail.com
- (xlii) xrmidlandstraining@protonmail.com
- (xliii) XRNE.training@protonmail.com
- (xliv) xrnw.training@gmail.com
- (xlv) xryorkshire.training@gmail.com
- (xlvi) xrni.tt@rebellion.earth
- (xlvii) talksandtrainings.scotland@extinctionrebellion.uk
- (xlviii) xrtse@gmail.com
- (xlix) xrsw.trainings@gmail.com

Just Stop Oil

- (l) Ring2021@protonmail.com
- (li) juststopoil@protonmail.com

Youth Climate Swarm

- (lii) youthclimateswarm@protonmail.com

Insulate Britain

- (liii) Ring2021@protonmail.com
- (liv) iblegal@protonmail.com

Latest news

Kingsbury Oil Terminal Protests

Published on Wednesday, 15th March 2023

Just Stop Oil - High Court Injunction

Background

In April 2022 following several protests at the Kingsbury Oil Terminal which caused a number of significant safety risks and large-scale disruption to the operation of the Terminal and the local community, working in partnership with Warwickshire Police, North Warwickshire Borough Council applied to the High Court for an Order to prohibit the disruptive elements of those protests. On 14 April 2022 the High Court made an Order which restricted certain behaviour whilst allowing peaceful and lawful protests to continue. On 5 May 2022 the High Court varied that Order slightly to clarify the areas in which lawful protesting could take place.

Even though lawful protests could take place at the location a number of those attending the site refused to comply with the Order and committed acts which breached it. This led to Warwickshire Police arresting 139 people in the vicinity of the Terminal, followed by committal proceedings in which the Court found that 70 individuals had committed 108 breaches of the Order. The breaches included entering the site and tampering with equipment, blocking the highway to stop traffic, and then climbing on fuel tankers, and digging tunnels under the public highway. The Court imposed various sanctions for the breaches, including prison sentences and fines.

This number of breaches shows that the Order is necessary and, were it not in place, there would be a significant risk of further disruption to the community, including risk of harm to individuals and their property.

The Current Applications

A person claiming to be connected to Extinction Rebellion has now applied to the High Court to set aside the Order arguing that it is a breach of human rights. The Council has now also made an application to the Court asking it to make the following Orders:

1. To list the case for a full hearing so that the Court can decide whether to make a Final Order which prohibits the disruptive behaviour concerned.
2. To add those 139 people who have been arrested as named Defendants.
3. To allow the Council to serve copies of the application by alternative means in relation to those Defendants and proposed Defendants for which the Council has no current address.
4. To dismiss the application to set aside the Order.

Documents

Copies of the following documents can be found on the Council's website at: [Injunction Documents | Just Stop Oil - High Court Injunction | North Warwickshire \(northwarks.gov.uk\)](#).

- A. The Council's current Application to the Court and supporting witness statement.

- B. The Interim Injunction Order made in 2022 and Power of Arrest.
- C. The Claim form and supporting documentation.

Hearing

The Court hearing for these applications is likely to take place at the High Court in Birmingham. The Court will shortly issue a notice giving the time and place of the hearing. A copy of that notice will then be added to the Council's website.

Copies of Documents

Copies of the documents referred to at A to C above can be obtained by contacting the following:

CliveTobin@NorthWarks.gov.uk

AnnieRyan@NorthWarks.gov.uk

legalservices@NorthWarks.gov.uk

More articles in the [news archive](#)

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IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
BIRMINGHAM DISTRICT REGISTRY
BEFORE MR JUSTICE SWEETING

6 August 2023

B E T W E E N

NORTH WARWICKSHIRE BOROUGH COUNCIL

and



- (1) DAVID BALDWIN
- (2) THOMAS BARBER
- (3) MICHELLE CADET-ROSE
- (4) TIM HEWES
- (5) JOHN HOWLETT
- (6) JOHN JORDAN
- (7) CARMEN LEAN
- (8) ALISON LEE
- (9) AMY PRITCHARD
- (10) STEPHEN PRITCHARD
- (11) PAUL RAITHBY
- (12) HOLLY ROTHWELL
- (13) NO LONGER PURSUED
- (14) JOHN SMITH
- (15) BEN TAYLOR
- (16) JANE THEWLIS
- (17) ANTHONY WHITEHOUSE
- (18) NO LONGER PURSUED
- (19) PERSONS UNKNOWN WHO ARE ORGANISING, PARTICIPATING IN OR
ENCOURAGING OTHERS TO PARTICIPATE IN PROTESTS AGAINST THE
PRODUCTION AND/OR USE OF FOSSIL FUELS, IN THE LOCALITY OF THE
SITE KNOWN AS KINGSBURY OIL TERMINAL, TAMWORTH B78 2HA
- (20) JOHN JORDAN

Defendants

ORDER

BEFORE Mr Justice Sweeting sitting in the High Court of Justice, King's Bench Division at the Royal Courts of Justice.

UPON the Judgment of the Supreme Court in the case of Wolverhampton City Council and others -v- London Gypsies and Travellers and others UKSC 2022/0046 not having been handed down and having heard written representations on behalf of the Claimant and the 72nd Defendant that the outcome of that decision is relevant to the Trial of this matter.

IT IS ORDERED THAT:

1. The Trial listed for the week commencing 24 July is vacated and the matter is listed for hearing on the first available date in November 2023 with a time estimate of 2 days.
2. Pursuant to CPR rules 6.27 and 81.4(2) (c) and (d), the Claimant shall be permitted to serve this Order:
 - (a) Pursuant to CPR rule 6.38 on the 140th Defendant outside of the jurisdiction.
 - (b) On the 21st-23rd, 25th-30th, 32nd-61st, 63rd, 66th-72nd, 74th-76th, 78th-86th, 88th-106th, 108th, 110th, 111th, 113th-141st, 143rd-154th and 156th-158th Defendants by the alternative method of recorded first class post.
 - (c) On the 20th, 24th and 65th Defendants by the alternative method of emailing the email addresses that they supplied to the Claimant during the committal proceedings against them in August 2022, and
 - (d) On the 31st, 62nd, 64th, 73rd, 77th, 87th, 107th, 109th, 112th, 142nd and 155th Defendants (for whom the Claimant does not have any contact details by the following alternative methods:

- (i) Posting copies on its website,
- (ii) Publicising them using the Claimant's Facebook page and Twitter account,
- (iii) Using best endeavours to ensure that copies are posted on the local police social media accounts.
- (iv) Posting a link to the copies posted on the Claimant's webpage to the Facebook, Twitter, LinkedIn, YouTube and Instagram accounts of Just Stop Oil.
- (v) Emailing copies to the following email addresses associated with Just Stop Oil:
 - (a) Ring2021@protonmail.com
 - (b) juststopoil@protonmail.com
 - (c) youthclimateswarm@protonmail.com
- (vi) Placing copies prominently at the entrances to the Terminal;
- (vii) Displaying copies at the public entrances of the Claimant's main offices.
- (viii) Issuing a media release concerning this Order. Such release must provide:
 - (a) a summary of this Order;
 - (b) the date, time and location of any future hearings, if known
 - (c) the addresses of the webpage on which this order is published.
 - (e) The Claimants' contact details as set out below; and
 - (f) Details of where and how copies of this Order, the Order dated 31 March and Application documents may be obtained.

Such release shall be made to, but is not limited to, local print publications including the [Coventry Telegraph]; local radio stations including [BBC Coventry and Warwickshire and BBC West Midlands]; and the following television stations, [BBC West Midland and Central Television] by 23:59 on [4 August 2023]

- (ix) Any other like manner as the Claimant may decide to use in order to bring the Claim Form and this Order and power of arrest to the attention of the Defendants and other persons likely to be affected.
3. The deemed date of service of this Order and the application documents above shall be the date of the relevant certificate of service on completion of the steps described in paragraphs 2(a)-(c) of this Order.

Directions to Trial

4. The Claimant is to file and serve any updating evidence that it wishes to rely upon by 16:00 on 31st August 2023.
5. Any other person wishing to be heard at the final hearing of this claim shall file and serve an Acknowledgement of Service by 16:00 on 7 September 2023 and apply to be joined as a named Defendant at the same time.
6. Any Defendant or person who fails to comply with paragraph 5 above shall not be permitted to defend or take any further role in these proceedings without further order of the Court.
7. The Defendants are to file and serve a Defence and any evidence upon which they seek to rely upon by 28 September 2023.
8. The Claimant is to file and serve any Reply and evidence in support by 12 October 2023.
9. Pursuant to CPR rule 6.38, the Claimant has permission to serve any document referred to at paragraphs 4 and 8 above on the 140th Defendant outside of the jurisdiction.
10. Pursuant to CPR rules 6.27 and 81.4(2) (c) and (d), the Claimant has permission to serve any document referred to at paragraphs 4 and 8 above by the means set out in paragraph 2

11. Costs in the case.

SCHEDULE 1

- (21) THOMAS ADAMS**
- (22) MARY ADAMS**
- (23) COLLIN ARIES**
- (24) STEPHANIE AYLETT**
- (25) MARCUS BAILIE**
- (26) MAIR BAIN**
- (27) JEREMY BAYSTON**
- (28) PAUL BELL**
- (29) PAUL BELL**
- (30) SARAH BENN**
- (31) RYAN BENTLEY**
- (32) DAVID ROBERT BERKSHIRE**
- (33) MOLLY BERRY**
- (34) GILLIAN BIRD**
- (35) RACHEL JANE BLACKMORE**
- (36) PAUL BOWERS**
- (37) KATE BRAMFITT**
- (38) SCOTT BREEN**
- (39) ALICE BRENCHER**
- (40) EMILY BROCKLEBANK**
- (41) TOMMY BURNETT**
- (42) TEZ BURNS**
- (43) GEORGE BURROW**
- (44) JADE CALLAND**
- (45) OLWEN CARR**
- (46) CAROLINE CATTERMOLLE**
- (47) IAN CAVE**
- (48) MICHELLE CHARLESWORTH**
- (49) ZOE COHEN**
- (50) JONATHAN COLEMAN**
- (51) PAUL COOPER**

- (52) CLARE COOPER**
- (53) JEANINIE DONALD-MCKIM**
- (54) KATHRYN DOWDS**
- (55) JANINE EAGLING**
- (56) STEPHEN EECKELAERS**
- (57) SANDRA ELSWORTH**
- (58) HOLLY JUNE EXLEY**
- (59) CAMERON FORD**
- (60) WILLIAM THOMAS GARRATT-WRIGHT**
- (61) ELIZABETH GARRATT-WRIGHT**
- (62) ALASDAIR GIBSON**
- (63) ALEXANDRA GILCHRIST**
- (64) STEPHEN GINGELL**
- (65) CALLUM GOODE**
- (66) KATHRYN GRIFFITH**
- (67) FIONA GRIFFITH**
- (68) JOANNE GROUNDS**
- (69) ALAN GUTHRIE**
- (70) DAVID GWYNE**
- (71) SCOTT HADFIELD**
- (72) SUSAN HAMPTON**
- (73) JAKE HANDLING**
- (74) FIONA HARDING**
- (75) GWEN HARRISON**
- (76) DIANA HEKT**
- (77) ELI HILL**
- (78) JOANNA HINDLEY**
- (79) ANNA HOLLAND**
- (80) BEN HOMFRAY**
- (81) JOE HOWLETT**
- (82) ERIC HOYLAND**
- (83) REUBEN JAMES**
- (84) RUTH JARMAN**

- (85) STEPHEN JARVIS**
- (86) SAMUEL JOHNSON**
- (87) INEZ JONES**
- (88) CHARLOTTE KIRIN**
- (89) JENNIFER KOWALSKI**
- (90) JERARD LATIMER**
- (91) CHARLES LAURIE**
- (92) PETER LAY**
- (93) VICTORIA LINDSELL**
- (94) EL LITTEN**
- (95) EMMA MANI**
- (96) RACHEL MANN**
- (97) DAVID MANN**
- (98) DIANA MARTIN**
- (99) LARCH MAXEY**
- (100) ELIDH MCFADDEN**
- (101) LOUIS MCKECHNIE**
- (102) JULIA MERCER**
- (103) CRAIG MILLER**
- (104) SIMON MILNER-EDWARDS**
- (105) BARRY MITCHELL**
- (106) DARCY MITCHELL**
- (107) ERIC MOORE**
- (108) PETER MORGAN**
- (109) RICHARD MORGAN**
- (110) ORLA MURPHY**
- (111) JOANNE MURPHY**
- (112) GILBERT MURRAY**
- (113) CHRISTIAN MURRAY-LESLIE**
- (114) RAJAN NAIDU**
- (115) CHLOE NALDRETT**
- (116) JANE NEECE**
- (117) DAVID NIXON**

- (118) THERESA NORTON**
- (119) RYAN O TOOLE**
- (120) GEORGE OAKENFOLD**
- (121) NICOLAS ONLAY**
- (122) EDWARD OSBOURNE**
- (123) RICHARD PAINTER**
- (124) DAVID POWTER**
- (125) STEPHANIE PRIDE**
- (126) HELEN REDFERN**
- (127) SIMON REDING**
- (128) MARGARET REID**
- (129) CATHERINE RENNIE-NASH**
- (130) ISABEL ROCK**
- (131) CATERINE SCOTHORNE**
- (132) JASON SCOTT-WARREN**
- (133) GREGORY SCULTHORPE**
- (134) SAMUEL SETTLE**
- (135) VIVIENNE SHAH**
- (136) SHEILA SHATFORD**
- (137) DANIEL SHAW**
- (138) PAUL SHEEKY**
- (139) SUSAN SIDEY**
- (140) NOAH SILVER**
- (141) JOSHUA SMITH**
- (142) KAI SPRINGORUM**
- (143) MARK STEVENSON**
- (144) ANNE TAYLOR**
- (145) HANNAH TORRANCE BRIGHT**
- (146) JANE TOUIL**
- (147) JESSICA UPTON**
- (148) ISABEL WALTERS**
- (149) CRAIG WATKINS**
- (150) SARAH WEBB**

- (151) IAN WEBB**
- (152) ALEX WHITE**
- (153) WILLIAM WHITE**
- (154) SAMANTHA WHITE**
- (155) LUCIA WHITTAKER-DE-ABREU**
- (156) EDRED WHITTINGHAM**
- (157) CAREN WILDEN**
- (158) MEREDITH WILLIAMS**
- (159) PAMELA WILLIAMS**

Final Hearing of the Council's Application for an Injunction to prevent disruption being caused by those protesting at Kingsbury Oil Terminal

[Further detail here](#)

Latest news

Kingsbury Oil Terminal Protests - injunction

Published on Thursday, 10th August 2023

Just Stop Oil High Court Injunction

Background

In April 2022 following protests at the Kingsbury Oil Terminal which caused significant safety risks and extensive disruption to operations at the Terminal and the local community, working in partnership with Warwickshire Police, North Warwickshire Borough Council applied to the High Court for an Order prohibiting the disruptive elements of those protests. On 14 April 2022 the High Court granted an Order restricting certain behaviour whilst allowing peaceful and lawful protests to continue. On 5 May 2022 the High Court varied that Order slightly to clarify the areas in which peaceful protests could lawfully take place.

Even though lawful protests could take place at the location a number of those attending the site refused to comply with the Order and committed acts which breached it. This led to Warwickshire Police arresting 139 people in the vicinity of the Terminal, followed by committal proceedings in which the Court found that 70 individuals had committed 108 breaches of the Order. The breaches included entering the site and tampering with equipment, blocking the highway to stop traffic and then climbing on fuel tankers, and digging tunnels under the public highway. The Court imposed various sanctions for the breaches, including prison sentences and fines.

This number of breaches shows that the Order remains necessary and, were it not in place, there would be a significant risk of further disruption to the community, including risk of harm to individuals and their property.

The Current Position

In March a third party applied to the High Court to set aside the Order, at which time the Council also made an application to the Court asking it to make the following Orders:

1. To list the case for a full hearing so that the Court can decide whether to make a Final Order which prohibits the disruptive behaviour concerned.
2. To add those 139 people who have been arrested as named Defendants.
3. To allow the Council to serve copies of the application by alternative means in relation to those Defendants and proposed Defendants for which the Council has no current address.

The Court granted these Orders and the Application to set aside the Order was withdrawn by agreement.

On 14 July the Court handed down its Judgment from the hearing last May, a copy of which can be found on the Council's website at the link below. That Judgment states that the Order made on 5 May 2022 will remain in place until the final hearing of the Council's application.

On 8 August the Court made a further Order that the final hearing of the Council's application will take place in November 2023.

Documents

Copies of the relevant documents can be found on the Council's website at: [Injunction Documents | Just Stop Oil - High Court Injunction | North Warwickshire \(northwarks.gov.uk\)](#) including:

- A. The Order dated 31 March 2023.
- B. The Order dated 8 August 2023.
- C. The Interim Injunction Orders made in April and May 2022 and associated Powers of Arrest.
- D. The Claim form and supporting documentation.

Final Hearing

The final hearing of the Council's application in November is likely to take place at the High Court in Birmingham. The Court will shortly confirm the date, time, and place of the hearing. A copy of the notice of the hearing date and any further Court Orders will then be added to the Council's website.

Copies of Documents

Copies of the documents referred to at A to D above can also be obtained by contacting the following:

CliveTobin@NorthWarks.gov.uk
AnnieRyan@NorthWarks.gov.uk
legalservices@NorthWarks.gov.uk

More articles in the [news archive](#)

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E. Documents related to service

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

Dear Extinction Rebellion,

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

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

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

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

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

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

Yours faithfully,

Owen Talfan Davies

Partner

D: +44 330 460 6961

M: +44 7711 088057

fieldfisher



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

Dear Just Stop Oil,

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

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

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

Yours faithfully,

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

fieldfisher



Ella Haydon

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

Dear Extinction Rebellion,

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

Yours faithfully,

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

fieldfisher



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

Dear Extinction Rebellion,

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

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

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

Yours faithfully,

Owen Talfan Davies

Partner

D: +44 330 460 6961

M: +44 7711 088057

fieldfisher



Ella Haydon

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

Dear Just Stop Oil,

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

Yours faithfully,

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

fieldfisher



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

Dear Just Stop Oil,

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

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

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

Yours faithfully,

Owen Talfan Davies

Partner

D: +44 330 460 6961

M: +44 7711 088057

fieldfisher



Subject: RE: Your message couldn't be delivered

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

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

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

Subject: Your message couldn't be delivered

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

Your message couldn't be delivered

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

Further information

Connection timed out (Connection timed out)

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

Powered by **mimecast**

© 2003 - 2019 Mimecast Services Limited.

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



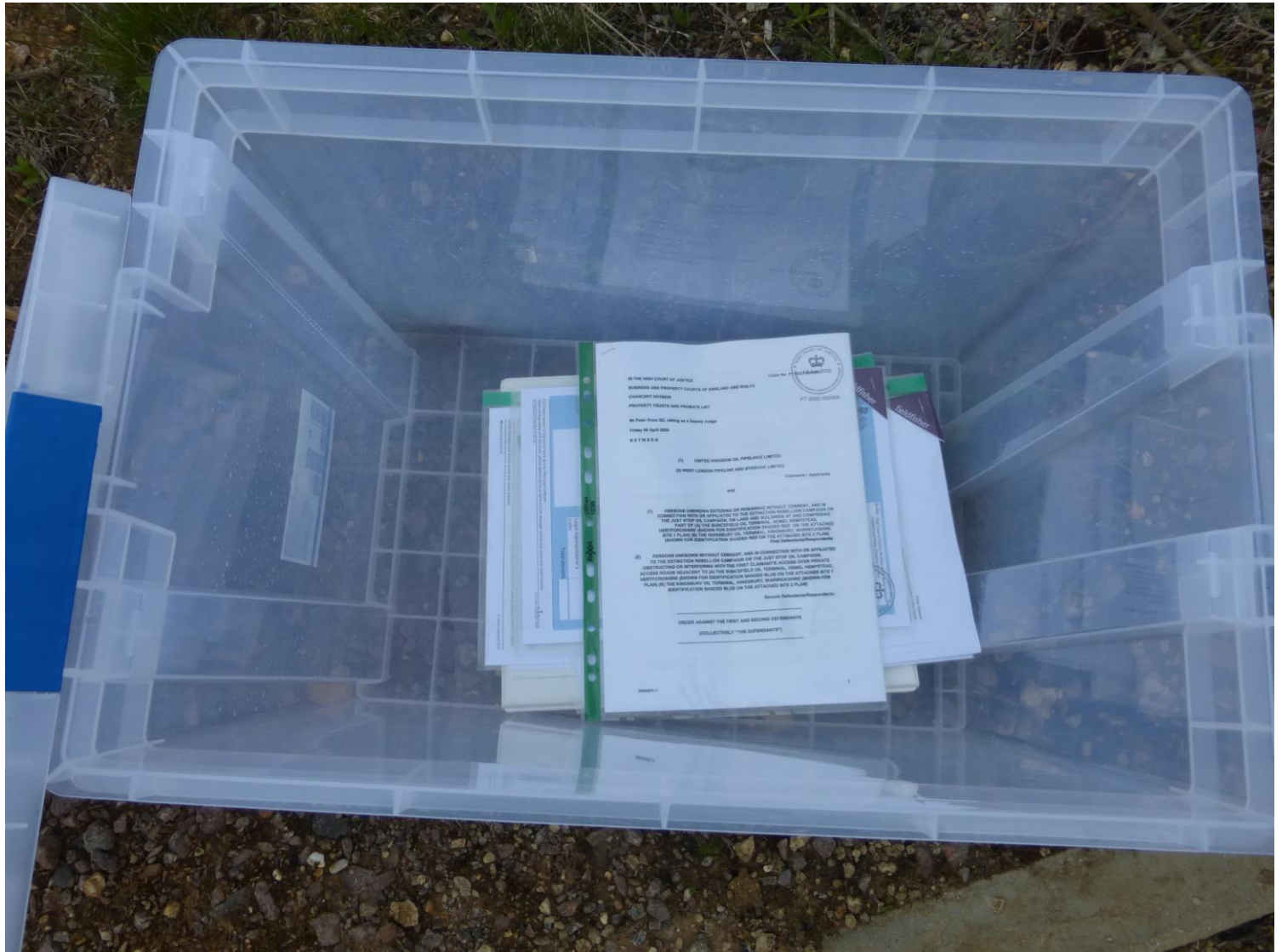
Site 1: East Entrance to Oil Road - 6.56am on 13 April 2022



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



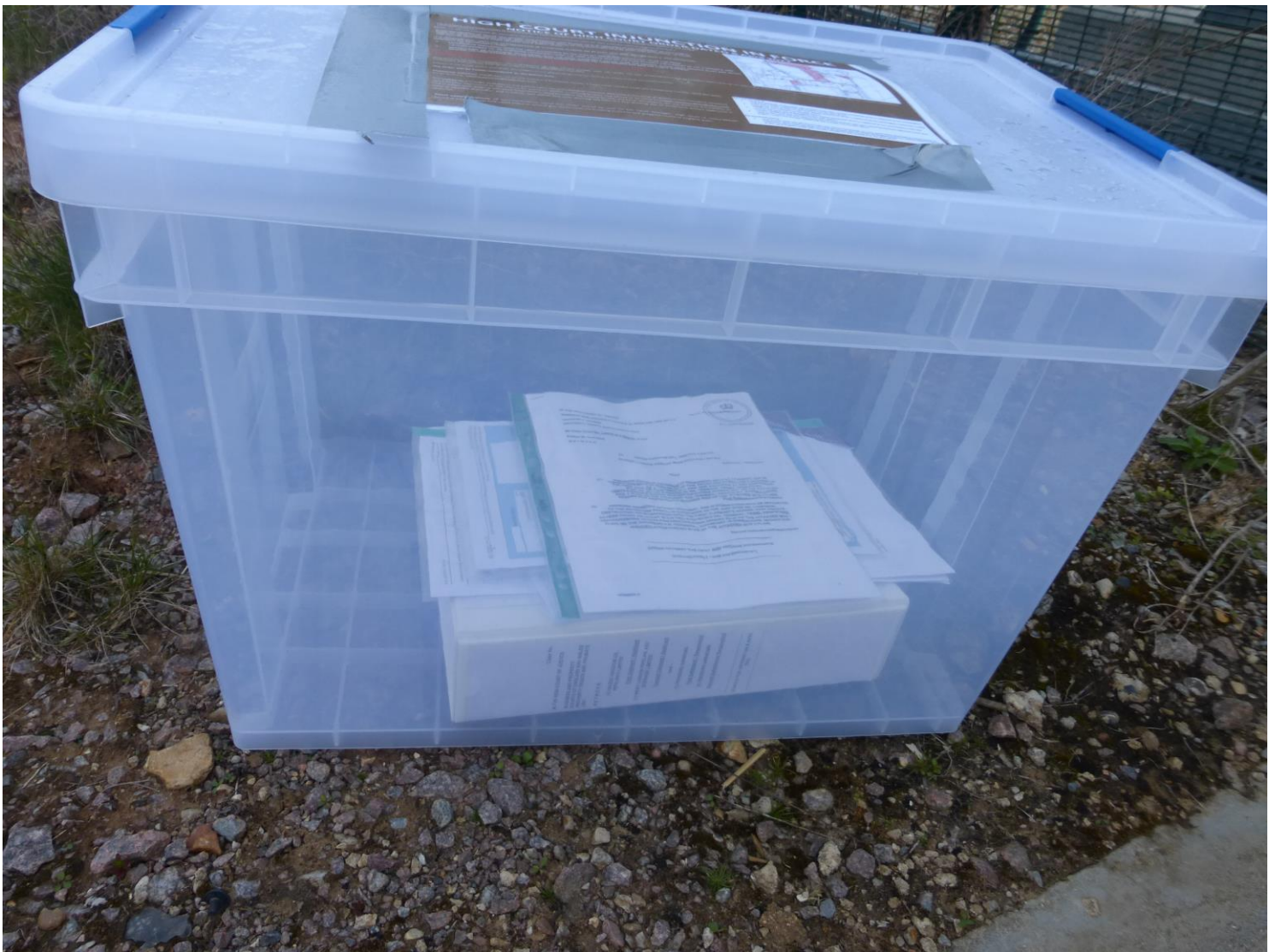
Site 1: Main entrance to Cherry Tree Farm – 7.12am on 13 April 2022



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



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



Site 2: 9.00am on 13 April 2022



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

Fiona Sellers

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

Dear Extinction Rebellion,

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

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

<https://ukop.azurewebsites.net>

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

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

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

UKOPinjunction@fieldfisher.com

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

Yours faithfully,

Owen Talfan Davies
Partner
D: +44 330 460 6961

Fiona Sellers

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

Dear Just Stop Oil,

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

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

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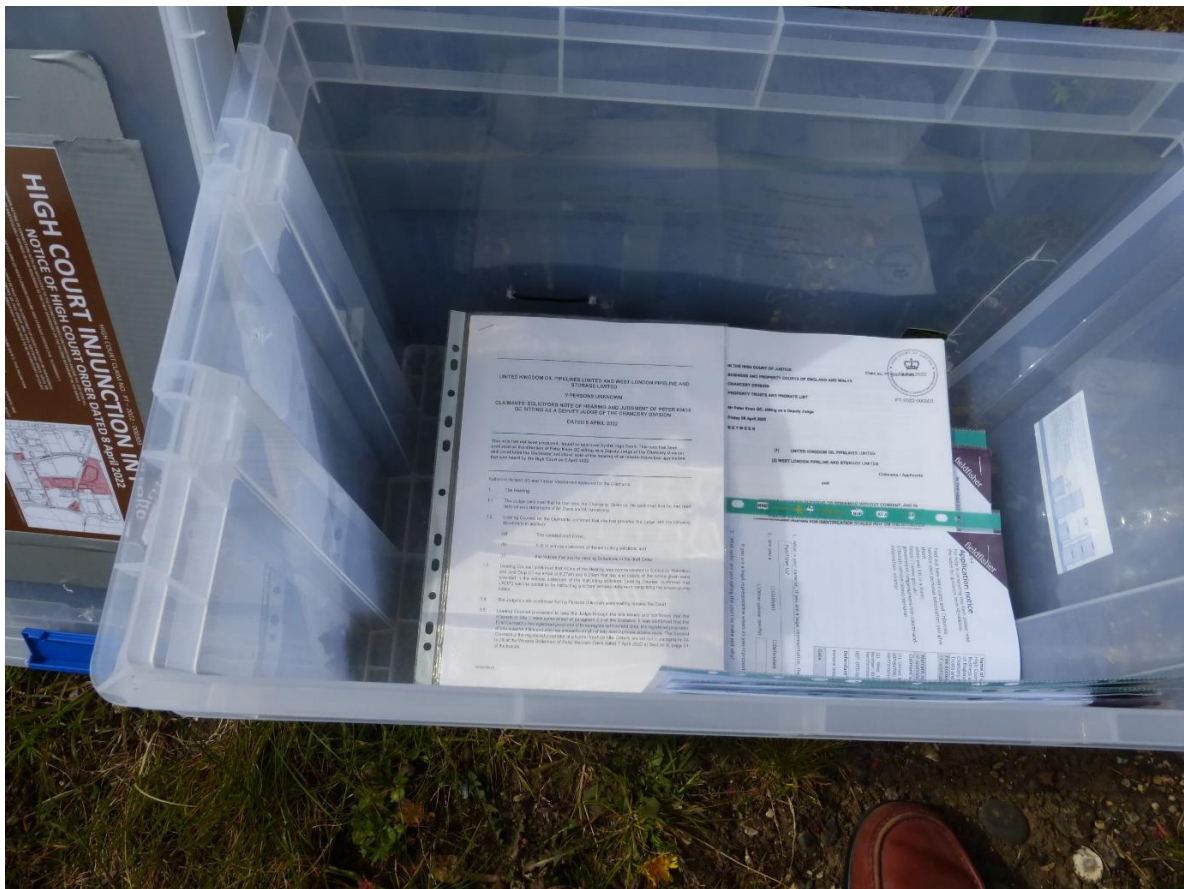
UKOPinjunction@fieldfisher.com

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

Yours faithfully,

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

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



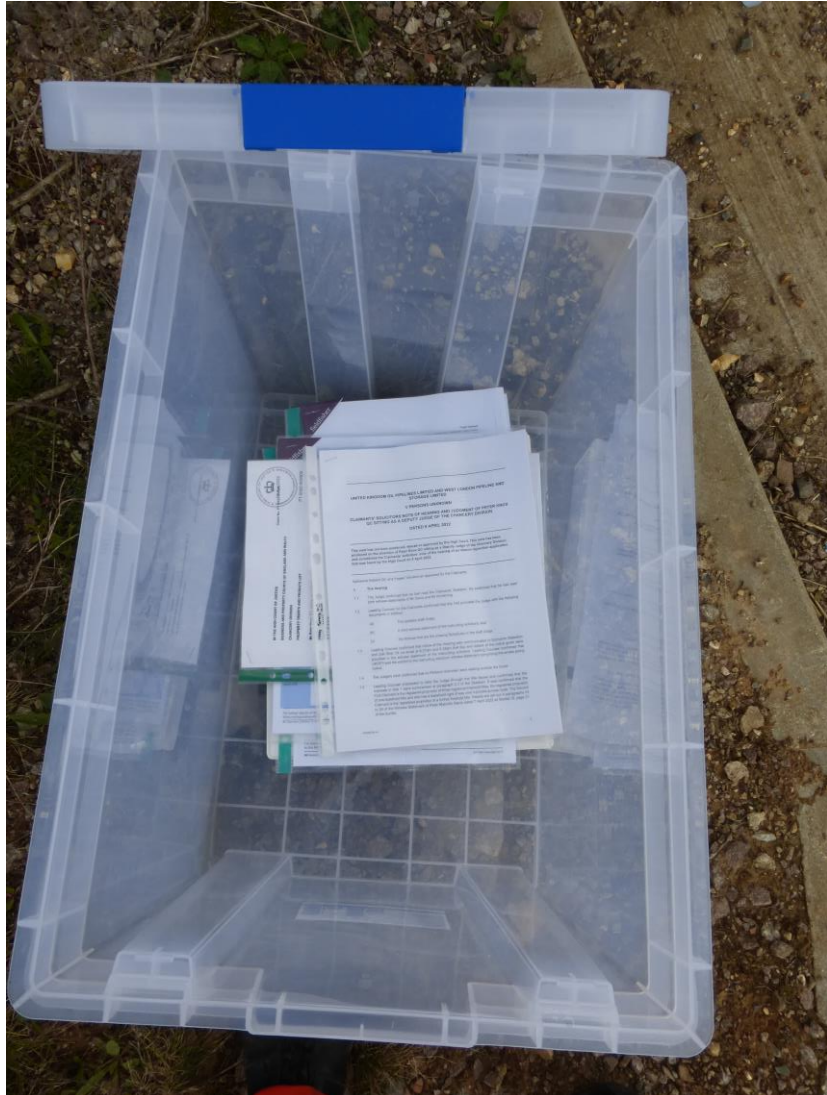
Site 1: East entrance to Oil Road – 11.58am on 13 April 2022



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



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



Site 2: 1.00pm on 13 April 2022



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

IN THE HIGH COURT OF JUSTICE

Claim No. PT-2022-000303

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

CHANCERY DIVISION

PROPERTY TRUSTS AND PROBATE LIST

B E T W E E N

(1) UNITED KINGDOM OIL PIPELINES LIMITED

(2) WEST LONDON PIPELINE AND STORAGE LIMITED

Claimants / Applicants

and

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

First Defendants/Respondents

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

Second Defendants/Respondents

WITNESS STATEMENT OF PROCESS SERVER

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


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

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

Statement of Truth

I believe that the facts stated in this Witness Statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed:


.....

RICHARD THOMAS

Dated:

13 April 2022

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

IN THE HIGH COURT OF JUSTICE

Claim No. PT-2022-000303

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

CHANCERY DIVISION

PROPERTY TRUSTS AND PROBATE LIST

B E T W E E N

(1) UNITED KINGDOM OIL PIPELINES LIMITED

(2) WEST LONDON PIPELINE AND STORAGE LIMITED

Claimants / Applicants

and

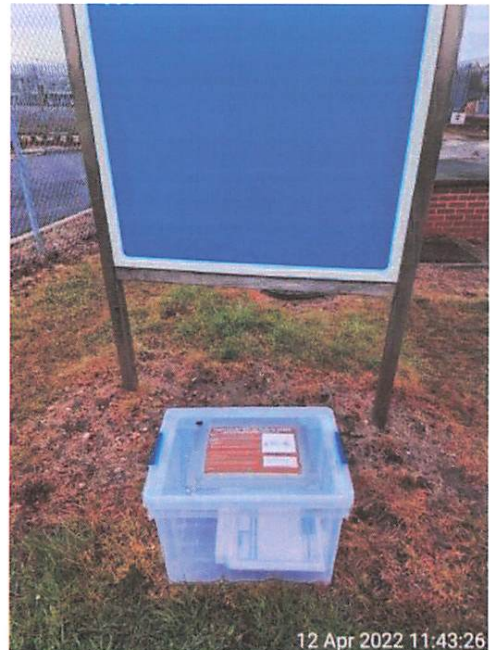
(1) PERSONS UNKNOWN ENTERING OR REMAINING WITHOUT CONSENT, AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN OR THE JUST STOP OIL CAMPAIGN, ON LAND AND BUILDINGS AT AND COMPRISING PART OF (A) THE BUNCEFIELD OIL TERMINAL, HEMEL HEMPSTEAD, HERTFORDSHIRE (SHOWN FOR IDENTIFICATION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

First Defendants/Respondents

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

Second Defendants/Respondents

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



Signed:
RICHARD THOMAS

Dated: 13 April 2022

RICHARD THOMAS:
CLAIMANTS/APPLICANTS:
STATEMENT NO: 1

IN THE HIGH COURT OF JUSTICE

Claim No. PT-2022-000303

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

CHANCERY DIVISION

PROPERTY TRUSTS AND PROBATE LIST

B E T W E E N

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Claimants / Applicants

and

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

First Defendants/Respondents

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

Second Defendants/Respondents

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

Signed:


.....

RICHARD THOMAS

Dated:

13 April 2022



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

IN THE HIGH COURT OF JUSTICE

Claim No. PT-2022-000303

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

CHANCERY DIVISION

PROPERTY TRUSTS AND PROBATE LIST

B E T W E E N

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(2) WEST LONDON PIPELINE AND STORAGE LIMITED

Claimants / Applicants

and

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


First Defendants/Respondents

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

Second Defendants/Respondents

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

Signed:


.....

RICHARD THOMAS

Dated:

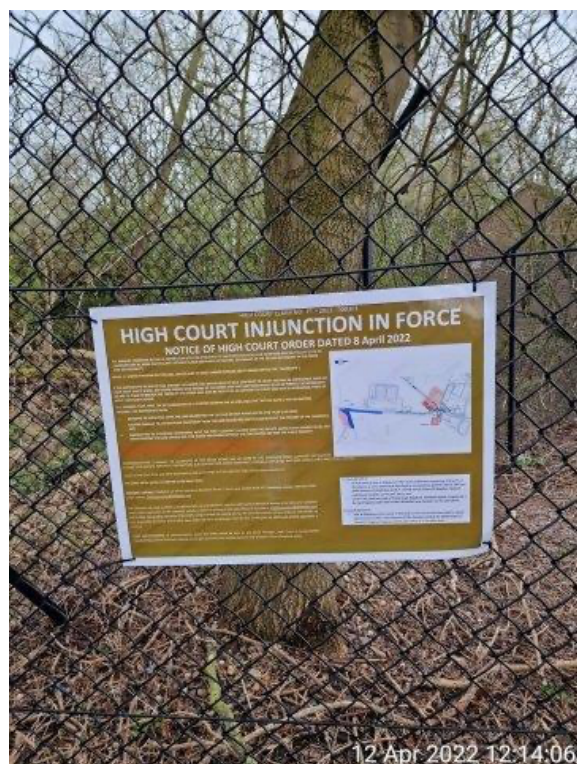
13 April 2022



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



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



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



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

IN THE HIGH COURT OF JUSTICE

Claim No. PT-2022-000303

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

CHANCERY DIVISION

PROPERTY TRUSTS AND PROBATE LIST

B E T W E E N

(1) UNITED KINGDOM OIL PIPELINES LIMITED

(2) WEST LONDON PIPELINE AND STORAGE LIMITED

Claimants / Applicants

and

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

First Defendants/Respondents

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

Second Defendants/Respondents

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

Signed: 
.....
RICHARD THOMAS

Dated: 13 April 2022

HIGH COURT INJUNCTION IN FORCE

NOTICE OF HIGH COURT ORDER DATED 8 April 2022

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

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

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

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

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

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

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

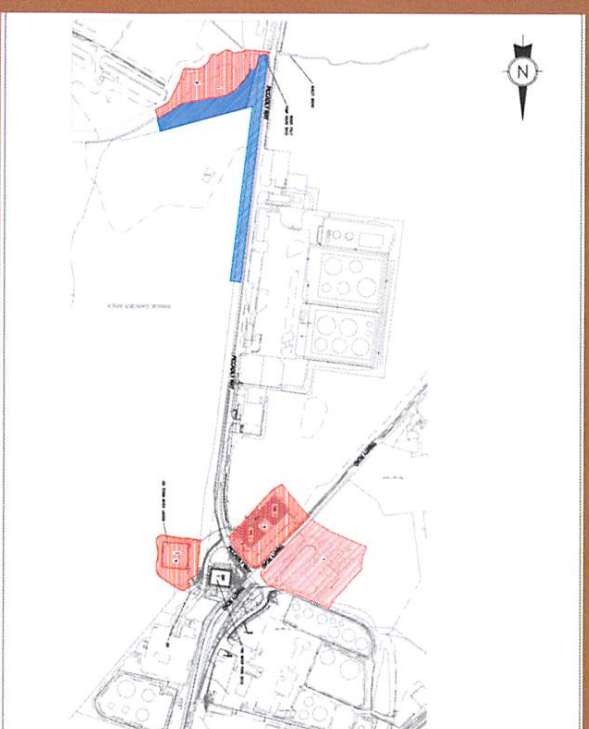
Copies of the Court Order and other documents in the proceedings may be viewed at: <https://ukop.azurewebsites.net>

The Order will be further considered on the Return Date.

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

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

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



The freehold land at:

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

The leasehold land at:

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

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

IN THE HIGH COURT OF JUSTICE

Claim No. PT-2022-000303

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

CHANCERY DIVISION

PROPERTY TRUSTS AND PROBATE LIST

B E T W E E N

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

Claimants / Applicants

and

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

First Defendants/Respondents

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

Second Defendants/Respondents

WITNESS STATEMENT OF PROCESS SERVER

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

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

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

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

Statement of Truth

I believe that the facts stated in this Witness Statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed:


.....

RICHARD THOMAS

Dated:

13 April 2022

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

IN THE HIGH COURT OF JUSTICE

Claim No. PT-2022-000303

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

CHANCERY DIVISION

PROPERTY TRUSTS AND PROBATE LIST

B E T W E E N

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

Claimants / Applicants

and

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

First Defendants/Respondents

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

Second Defendants/Respondents

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



Signed:

RICHARD THOMAS

Dated:

13 April 2022

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

IN THE HIGH COURT OF JUSTICE

Claim No. PT-2022-000303

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

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First Defendants/Respondents

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

Second Defendants/Respondents

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

Signed:


.....

RICHARD THOMAS

Dated:

13 April 2022

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

IN THE HIGH COURT OF JUSTICE

Claim No. PT-2022-000303

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

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First Defendants/Respondents

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

Second Defendants/Respondents

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

Signed:


.....

RICHARD THOMAS

Dated:

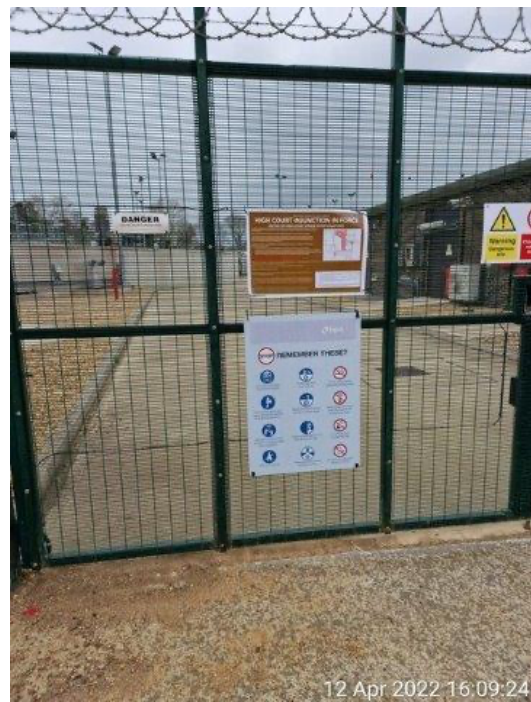
13 April 2022



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

IN THE HIGH COURT OF JUSTICE

Claim No. PT-2022-000303

BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES

CHANCERY DIVISION

PROPERTY TRUSTS AND PROBATE LIST

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

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First Defendants/Respondents

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

Second Defendants/Respondents

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

Signed:

.....

RICHARD THOMAS

Dated:

13 April 2022

HIGH COURT INJUNCTION IN FORCE

NOTICE OF HIGH COURT ORDER DATED 8 April 2022

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

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

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

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

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

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

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

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

The Order will be further considered on the Return Date.

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

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

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



The freehold land at:

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

The leasehold land at:

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

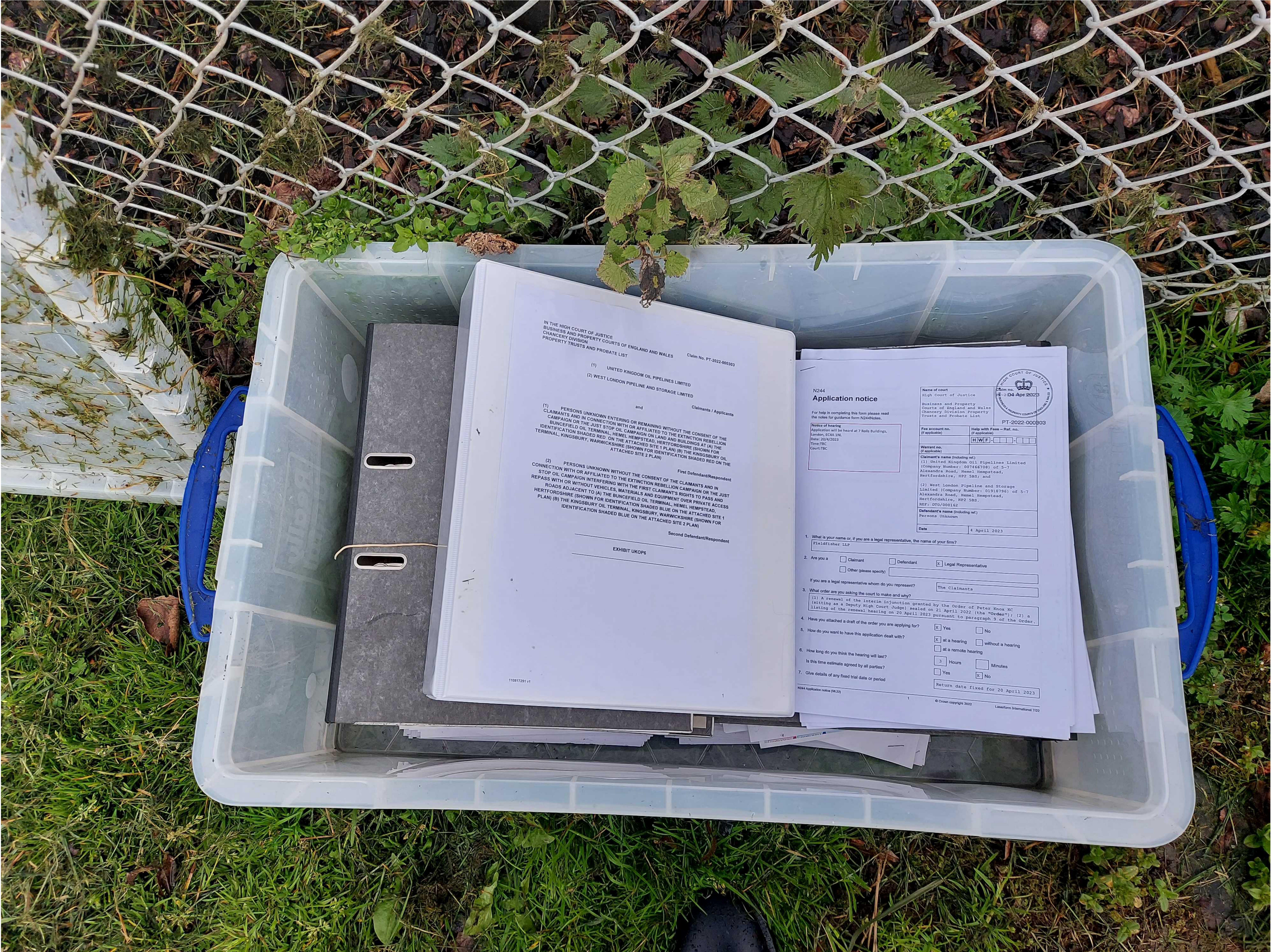












IN THE HIGH COURT OF JUSTICE
BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES
CHANCERY DIVISION
PROPERTY TRUSTS AND PROBATE LIST

Claim No. PT-2022-000303

(1) UNITED KINGDOM OIL PIPELINES LIMITED

(2) WEST LONDON PIPELINE AND STORAGE LIMITED

and

Claimants / Applicants

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

(2) PERSONS UNKNOWN WITHOUT THE CONSENT OF THE CLAIMANTS AND IN CONNECTION WITH OR AFFILIATED TO THE EXTINCTION REBELLION CAMPAIGN AND IN 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)

First Defendant/Respondent

EXHIBIT UKOP6

110817291 v1

N244
Application notice

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

Notice of hearing
Application will be heard at 7 Rolls Buildings, London, EC4A 3DF
Date: 20/4/2023
Time: 10:00
Court: TBC

Name of court
High Court of Justice
Business and Property
Courts of England and Wales
Chancery Division Property
Trusts and Probate List

Claim no.
PT-2022-000303

Fee account no.
(if applicable)

Help with Fees - Ref. no.
(if applicable)
HWF- - - - -

Warrant no.
(if applicable)

Claimant's name (including ref.)
(1) United Kingdom Oil Pipelines Limited (Company Number: 00746708) of 5-7 Alexandra Road, Hemel Hempstead, Hertfordshire, HP2 5BS; and
(2) West London Pipeline and Storage Limited (Company Number: 01918796) of 5-7 Alexandra Road, Hemel Hempstead, Hertfordshire, HP2 5BS.
REF: 070/000162

Defendant's name (including ref.)
Persons Unknown

Date
4 April 2023

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

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

If you are a legal representative whom do you represent?
The Claimants

3. What order are you asking the court to make and why?
(1) A renewal of the interim injunction granted by the Order of Peter Knox KC (sitting as a Deputy High Court Judge) sealed on 21 April 2022 (the "Order"); (2) a listing of the renewal hearing on 20 April 2023 pursuant to paragraph 9 of the Order.

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

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

6. How long do you think the hearing will last?
Is this time estimate agreed by all parties?
☐ Yes ☒ No
3 Hours ☐ Minutes

7. Give details of any fixed trial date or period
Return date fixed for 20 April 2023

N244 Application notice (p6.23)
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VALERO ENERGY LIMITED, VALERO LOGISTICS LIMITED, VALERO TERMINAL LIMITED (the "Claimants")

High Court Injunction in Force

On 20 January 2023, an injunction was obtained by the Claimants in the High Court of Justice (Claim No Q8-2022-000904) prohibiting members of or those acting in connection with the environmental protest movements known as **Just Stop Oil**, **Extinction Rebellion**, **Insulate Britain** and/or **Youth Climate Swarm** from amongst other things entering or remaining on any part of the Claimants' Land and/or from blocking the entranceways to the Claimants' Land and/or affixing themselves to or erecting any structures upon, abandoning vehicles or items on, tunnelling under or using or occupying tunnels under the Access Roads which lead to and from the Claimants' Land (the "Order"). The extent of the Claimants' Land and Access Roads in this locality are shown on the accompanying plans and maps.

You must not contravene the terms of the Order and if you do, you may be sent to prison or have your assets seized

The Order and copies of the Claim Documents which relate to the Order may be viewed at:
https://www.docbox.com/chi/46plo3shfuce4/AADX3thH5X_6JFRaCCFr2yZea?d=0

Copies may also be obtained from Shoosmiths LLP by calling 0370 0663000 or by emailing valero.service@shoosmiths.co.uk

020 8523 5533
24 HOUR CONTROL CENTRE
www.totalsecurity.co.uk

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TRINITY ROAD

On 20 January 2023, an injunction was obtained by the Claimants in the High Court of Justice (Claim No. Q8-2022-000904) prohibiting members of or those acting in connection with the environmental protest movements known as **Just Stop Oil**, **Extinction Rebellion**, **Insulate Britain** and/or **Youth Climate Swarm** from amongst other things entering or remaining on any part of the Claimants' Land and/or from blocking the entranceways to the Claimants' Land and/or affixing themselves to or erecting any structures upon, abandoning vehicles or items on, tunnelling under or using or occupying tunnels under the Access Roads which lead to and from the Claimants' Land (the "Order"). The extent of the Claimants' Land and Access Roads in this locality are shown on the accompanying plans and maps.

You must not contravene the terms of the Order and if you do, you may be sent to prison or have your assets seized

The Order and copies of the Claim Documents which relate to the Order may be viewed at:
<https://www.docket.com/shit46plo3shfzuce4/AADX3thH5X-6JF8aCCF2vZea7dL-0>

Copies may also be obtained from Shoosmiths LLP by calling 0370 0863000 or by emailing valero.service@shoosmiths.co.uk

TRINITY ROAD

On 20 January 2023, an injunction was obtained by the Claimants in the High Court of Justice (Claim No. Q8-2022-000904) prohibiting members of or those acting in connection with the environmental protest movements known as Just Stop Oil, Extinction Rebellion, Insulate Britain and/or Youth Climate Swarm from amongst other things entering or remaining on any part of the Claimants' Land and/or from blocking the entranceways to the Claimants' Land and/or affixing themselves to or erecting any structures upon, abandoning vehicles or items on, tunnelling under or using or occupying tunnels under the Access Roads which lead to and from the Claimants' Land (the "Order"). The extent of the Claimants' Land and Access Roads in this locality are shown on the accompanying plans and maps.

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<https://www.docket.com/shit46plo3shfzuce4/AADX3thH5X-6JF8aCCF2vZea7dL-0>

Copies may also be obtained from Shoosmiths LLP by calling 0370 0863000 or by emailing valero.service@shoosmiths.co.uk



Honey Newbury

From: Rachel Bedford on behalf of Owen Talfan Davies
Sent: 06 April 2023 14:08
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 Pipelines Limited and (2) West London Pipeline Storage Limited (the "**Claimants**").

We write further to our correspondence on 26 April 2022 setting out that Mr Peter Knox KC sitting as Deputy Judge of the Chancery Division had made an order on 20 April 2022 which provided for the pre-emptive injunctive relief granted by the order of 8 April 2022 to continue (the "**Order**").

This Order also provided that a further return date hearing would be fixed for 20 April 2023 (the "**Return Date**") with a time estimate of 3 hours.

The Court has now confirmed that the Return Date hearing will take place on **20 April 2023 at 7 Rolls Buildings, London, EC4A 1NL** with the time of the hearing and the Court in which it will be heard to be confirmed. 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>

This weblink also contains the Claimants' further evidence for the Return Date hearing, together with the Court Documents from the hearings of 8 and 20 April 2022.

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**. We are authorised to accept service for and on behalf of the Claimants and confirm that service of any evidence and / or any skeleton argument, can be affected by emailing the relevant documents to the following email address:

UKOPinjunction@fieldfisher.com

The Claimants will prepare a bundle for use at the Return Date which contains the Court Documents together with the further evidence relied upon by the Claimants. The bundle will be made available at the weblink referred to above on **17 April 2023**.

Yours faithfully,

Fieldfisher

Owen Talfan Davies

Partner

D: +44 330 460 6961

M: +44 7711 088057

fieldfisher



Honey Newbury

From: Rachel Bedford on behalf of Owen Talfan Davies
Sent: 06 April 2023 14:09
To: juststopoil@protonmail.co.uk; 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 Pipelines Limited and (2) West London Pipeline Storage Limited (the "**Claimants**").

We write further to our correspondence on 26 April 2022 setting out that Mr Peter Knox KC sitting as Deputy Judge of the Chancery Division had made an order on 20 April 2022 which provided for the pre-emptive injunctive relief granted by the order of 8 April 2022 to continue (the "**Order**").

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Yours faithfully,

Fieldfisher

Owen Talfan Davies

Partner

D: +44 330 460 6961

M: +44 7711 088057

fieldfisher



To: Rachel Bedford; Lucy Crew
Cc: Owen Talfan Davies
Subject: RE: Your message couldn't be delivered [FFW-DOCS.FID6748503]

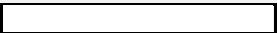
From: Domain postMaster address <postmaster@fieldfisher.com>
Sent: Monday, April 10, 2023 10:20 AM
To: Rachel Bedford <rachel.bedford@fieldfisher.com>
Subject: Your message couldn't be delivered



Your message couldn't be delivered

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

Further information
4.2.2 <juststopoil@protonmail.com>: Recipient address rejected: Mailbox quota exceeded
If you sent this message to multiple addresses, you'll receive a notification like this for every one that didn't arrive.



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To: Rachel Bedford; Lucy Crew
Cc: Owen Talfan Davies
Subject: RE: Your message couldn't be delivered [FFW-DOCS.FID6748503]

From: Domain postMaster address <postmaster@fieldfisher.com>
Sent: Monday, April 10, 2023 11:21 AM
To: Rachel Bedford <rachel.bedford@fieldfisher.com>
Subject: Your message couldn't be delivered

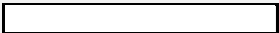


Your message couldn't be delivered

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

Further information
Connection timed out (Connection timed out)

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



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About us

Just Stop Oil is a nonviolent civil resistance group demanding the UK Government stop licensing all new oil, gas and coal projects.

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Contact us

Press enquiries: juststopoilpress@protonmail.com

General enquiries: info@juststopoil.org

Donation enquiries: giving@juststopoil.org

Volunteer enquiries: jsovolunteers@gmail.com

Book a speaker: contact@juststopoil.org

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The JSO website contains links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

Our data partners

The Action Network

Terms and conditions <https://actionnetwork.org/terms>

Privacy policy <https://actionnetwork.org/privacy>

Zoom

GDPR Compliance <https://explore.zoom.us/en/gdpr/>

Changes to our privacy policy

JSO keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on 13th June 2022.

How to contact us

If you wish to exercise any right, or for any queries you may have, or if you wish to make a complaint, please contact us at juststopoil@protonmail.com

How to contact the appropriate authorities

You have the right to complain to the ICO about the way in which we process your personal data. Please visit the Information Commissioner's Office for further information: website www.ico.org.uk.

-199-

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
4/5/2023 4:45 PM	3468912	Application notice- dated 04.04.23- for return hearing on 20.04.23 - 110797879 1.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
4/14/2022 4:00 PM	389745	Claimant's skeleton argument for return date hearing on 20.4.2022.pdf
4/8/2022 8:45 PM	887760	Defendant Response Pack - 103297040 1.pdf
4/8/2022 8:28 PM	1061012	Draft Order for Return Date Hearing (08.04.2022) - 103296915 1.DOCX
4/5/2023 4:47 PM	1724018	Draft Order for Return Date Hearing on 20.04.23 - dated 04.04.23 - 110800165 1.pdf
4/5/2023 4:51 PM	88150000	Exhibit UKOP6 - 110755402 1.pdf
4/5/2023 4:52 PM	397591	Exhibit UKOP7 - 110744707 1.pdf
4/21/2022 10:30 AM	1515942	Final Sealed Order for Return Date Hearing - (20.04.2022) - 103487582 1.PDF
4/8/2022 8:28 PM	4712019	First Witness Statement of Daniel Owen Christopher Talfan Davies dated 8 April 2022 together with Exhibit UKOP3 - 103
4/8/2022 8:28 PM	991217	PT-2022-000303 - Application Notice for Interim Injunction Hearing dated 7 April 2022 - 103296911 1.PDF
4/11/2022 4:10 PM	127841	PT-2022-000303 - Sealed Application Notice - Return Date - 08.04.2022 - 103313587 1.PDF
4/11/2022 4:10 PM	1141844	PT-2022-000303 - Sealed Claim Form - without rider - 11.04.2022 - 103313439 1.PDF
4/12/2022 11:38 AM	3631509	Sealed Order dated 8 April 2022 in relation to interim injunction hearing - 103338343 1.PDF
4/5/2023 4:51 PM	265683	Second Witness Statement of Peter Malcolm Davis- dated 05.04.23 - 110813940 1.pdf
4/5/2023 4:49 PM	385903	Third Witness Statement of John Michael Armstrong- dated 05.04.23 - 110812946 1.pdf
4/5/2023 4:43 PM	152	web.config

From: Faye Hyland <Faye.Hyland@fieldfisher.com>
Sent: 11 July 2023 15:39
To: xr-legal@riseup.net
Cc: UKOP injunction
Subject: RE: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Dear Extinction Rebellion,

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 6 April 2023, 17 April 2023, 19 April 2023 and 25 April 2023. For ease, we adopt the same definitions in this email.

As set out in our email dated 25 April 2023, the Order made on 20 April 2022 was considered further at the Return Date hearing, which took place on 20 April 2023 before Mr Justice Rajah. At the Return Date hearing, the Court granted a further order in favour of the Claimants which provides for the pre-emptive injunctive relief granted by the Order to continue until 20 October 2023, final determination of the Claimants' claim or further order in the interim, whichever is the earlier.

On 7 July 2023 the Claimants made an 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 (the **"Application"**). A copy of the Application, comprising the sealed Application Notice and Draft Order, along with supporting witness evidence and exhibits, can be viewed at the following weblink:

<https://ukop.azurewebsites.net>

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.

Any individual who may 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.

We confirm that we 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 the following email address:

UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Faye Hyland
Director
D: +44 330 460 6953

fieldfisher



Ella Haydon

From: xr-legal@riseup.net
Sent: 11 July 2023 15:39
To: Faye Hyland
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 Arrest Welfare Team (XR-ArrestWelfare@protonmail.com) with the details of your court date.

If your email is related to trainings run by our team, see our Trainings Calendar for details about upcoming Trainings. This can be accessed at this link: <https://teamup.com/ksqtxh86ftomucpgu>

During Rebellions, where you need an urgent response or if someone has been arrested at an action you are at, please call the XR Legal Back Office on 07749 335574 and we will deal with your query that way.

In Solidarity,
XR Legal Support Team

Ella Haydon

From: Faye Hyland <Faye.Hyland@fieldfisher.com>
Sent: 11 July 2023 15:38
To: juststopoilpress@protonmail.com; info@juststopoil.org;
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 Pipelines Limited and (2) West London Pipeline Storage Limited (the "**Claimants**").

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UKOPinjunction@fieldfisher.com

Yours faithfully,

Fieldfisher

Faye Hyland
Director
D: +44 330 460 6953

fieldfisher





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About us

Just Stop Oil is a nonviolent civil resistance group demanding the UK Government stop licensing all new oil, gas and coal projects.

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Contact us

Press enquiries: juststopoilpress@protonmail.com

General enquiries: info@juststopoil.org

Donation enquiries: giving@juststopoil.org

Volunteer enquiries: jsovolunteers@gmail.com

Book a speaker: contact@juststopoil.org

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The Action Network

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Privacy policy <https://actionnetwork.org/privacy>

Zoom

GDPR Compliance <https://explore.zoom.us/en/gdpr/>

Changes to our privacy policy

JSO keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on 13th June 2022.

How to contact us

If you wish to exercise any right, or for any queries you may have, or if you wish to make a complaint, please contact us at juststopoil@protonmail.com

How to contact the appropriate authorities

You have the right to complain to the ICO about the way in which we process your personal data. Please visit the Information Commissioner's Office for further information: website www.ico.org.uk.

Ella Haydon

From: Honey Newbury <Honey.Newbury@fieldfisher.com> on behalf of Faye Hyland <Faye.Hyland@fieldfisher.com>
Sent: 18 July 2023 16:35
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 Pipelines Limited and (2) West London Pipeline Storage Limited.

We write further to our email dated 11 July 2023, a copy of which is below. For ease, we adopt the same definitions in this email.

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.

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Yours faithfully,

Fieldfisher

Faye Hyland

Director

D: +44 330 460 6953



From: Faye Hyland <Faye.Hyland@fieldfisher.com>

Sent: Tuesday, July 11, 2023 3:39 PM

To: xr-legal@riseup.net

Cc: UKOP injunction <UKOPinjunction@fieldfisher.com>

Subject: RE: (1) United Kingdom Oil Pipelines Limited and (2) West London Pipeline and Storage Limited -v- Persons Unknown [FFW-DOCS.FID6748501]

Dear Extinction Rebellion,

Ella Haydon

From: xr-legal@riseup.net
Sent: 18 July 2023 16:36
To: Honey Newbury
Subject: Autoreply for XR Legal Support

Hi there,

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If your email is related to trainings run by our team, see our Trainings Calendar for details about upcoming Trainings. This can be accessed at this link: <https://teamup.com/ksqttxh86ftomucpgu>

During Rebellions, where you need an urgent response or if someone has been arrested at an action you are at, please call the XR Legal Back Office on 07749 335574 and we will deal with your query that way.

In Solidarity,
XR Legal Support Team

Ella Haydon

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Sent: 18 July 2023 16:35
To: juststopoilpress@protonmail.com; info@juststopoil.org; juststopoil@protonmail.com
Cc: UKOP injunction
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Yours faithfully,

Fieldfisher

Faye Hyland

Director

D: +44 330 460 6953



From: Faye Hyland <Faye.Hyland@fieldfisher.com>

Sent: Tuesday, July 11, 2023 3:38 PM

To: juststopoilpress@protonmail.com; info@juststopoil.org; juststopoil@protonmail.com

Cc: UKOP injunction <UKOPinjunction@fieldfisher.com>

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,

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
4/5/2023 4:45 PM	3468912	Application notice- dated 04.04.23- for return hearing on 20.04.23 - 110797879_1.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 April 2022) (as updated on 19 April 2022) - 103443168_2.pdf
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
4/17/2023 12:26 PM	2325296	Bundle of Authorities for Return Date Hearing on 20 April 2023.pdf
4/14/2022 4:00 PM	389745	Claimant's skeleton argument for return date hearing on 20.4.2022.pdf
4/17/2023 12:26 PM	189540	Claimants' Skeleton Argument for Return Date Hearing on 20 April 2023.pdf
4/6/2022 8:45 PM	887760	Defendant Response Pack - 103297040_1.pdf
7/10/2023 5:44 PM	1566913	Draft Order for Claimants Summary Judgment Application dated 7 July 2023 - 112689563_1.PDF
4/6/2022 8:28 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
7/11/2023 11:09 AM	7660669	Exhibit UKOP10 - 112418041_1.pdf
4/5/2023 4:51 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
4/21/2022 10:30 AM	1515942	Final Sealed Order for Return Date Hearing - (20.04.2022) - 103487582_1.PDF
4/6/2022 8:28 PM	4712019	First Witness Statement of Daniel Owen Christopher Talfan Davies dated 8 April 2022 together with Exhibit UKOP3 - 103279742_1.PDF
7/10/2023 5:44 PM	404212	Fourth Witness Statement of John Armstrong dated 6 July 2023 - 112644073_1.PDF
4/8/2022 8:28 PM	991217	PT-2022-000303 - Application Notice for Interim Injunction Hearing dated 7 April 2022 - 103296011_1.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
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
7/10/2023 5:44 PM	3200464	Sealed Application Notice - Claimants Summary Judgment Application dated 7 July 2023 containing details of listing appointment - 112708520_1.PDF
7/18/2023 1:04 PM	5203376	Sealed Application Notice- Claimants Summary Judgment Application dated 7 July 2023 containing Notice of hearing - 112897915_1.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
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	460500	Third Witness Statement of Peter Davis dated 5 July 2023 - 112638588_1.PDF
7/18/2023 1:34 PM	152	web.config